



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

Submitted via email: [Senator.Leising@iga.in.gov](mailto:Senator.Leising@iga.in.gov)

January 8, 2019

The Honorable Jean Leising  
200 Washington Street  
Indianapolis IN 46204

RE: Senate Bill 189

Dear Senator Leising:

On behalf of the American Speech-Language-Hearing Association, I write in opposition to Senate Bill 189, which would allow the Indiana Department of Education to issue emergency permits to unqualified individuals to deliver services to children with communication disorders in public schools.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

Individuals with a bachelor's degree do not have the education, clinical training, or expertise to assess and treat children with communication disorders. Speech-language pathologists (SLPs) who complete graduate education that includes supervised clinical training have the expertise to treat children with communication disorders.

### **Individuals with A Bachelor's Degree in Communication Sciences Are Unqualified to Practice Independently**

A bachelor's degree in communication disorders provides students with an understanding of normal language development. Graduate education is necessary for students to learn how to evaluate and treat children with communication disorders. Only an individual with a conferred master's degree or higher in communication disorders is qualified to practice independently.

A licensed SLP in Indiana has:

- a conferred graduate degree from an accredited university communication sciences and disorders program;
- completed a minimum of 400 hours of clinical training;
- successfully passed a nationally standardized exam; and
- completed a 9-month full-time supervised clinical fellowship.

### **Emergency Permits May Not Be Permitted Under Federal Law**

The Individuals with Disabilities Education Act (IDEA) Section 300.156 maintains that, "The State Education Agency (SEA) must establish and maintain qualifications to ensure that personnel necessary to carry out the purposes of this part are appropriately and adequately

prepared and trained, including that those personnel have the content knowledge and skills to serve children with disabilities.”<sup>1</sup> Further, Section (b) (2) (ii) states that related services personnel, which include speech-language pathologists, “Have not had certification or licensure requirements waived on an emergency, temporary, or provisional basis.”<sup>2</sup> Therefore, ASHA maintains that Senate Bill 189 may not be permitted under federal law.

### **Emergency Permits Have Been Proven Ineffective**

Several states across the country—including Indiana’s neighboring states—have tried to utilize individuals with emergency permits to deliver speech-language pathology services to children in public schools. Missouri chose to allow the state department of education to hire a limited number of individuals on an emergency basis to provide speech, language, and hearing services in schools. These individuals were required to have a bachelor’s degree in communication sciences and were required to be enrolled in or continue coursework in a master’s program. According to state requirements, the department was only able to hire a limited number of individuals on an emergency basis and could renew an individual’s permit only once. Over time, the number of emergency permits grew to 400 and individuals with permits were able to renew multiple times. Families complained that their children were not progressing and began to file lawsuits challenging the qualifications of those with emergency permits. Within a few years, the department eliminated the program and began to replace those individuals with qualified and licensed SLPs.

### **Shortages of Qualified SLPs**

ASHA recognizes that there are shortages of qualified providers in many states, particularly in rural areas. According to the Bureau of Labor Statistics (BLS), the national employment of SLPs is expected to *grow much faster than average* at 18% through the year 2026.<sup>3</sup> An additional 25,400 SLPs will be needed to fill the demand. The BLS statistics indicate that there are fewer SLPs in Indiana and more are needed to meet the demand. The location quotient indicates how concentrated an occupation is compared to the nation or surrounding region. In Indiana, employment of SLPs is lower than the national average with a location quotient of .84 and lower than surrounding states, including Illinois (1.09), Kentucky (1.12), and Ohio (.97).<sup>4</sup>

### **Solutions for SLP Shortages**

States that employ a single or universal license may have less demand for qualified SLPs.<sup>5</sup> Approximately 50% of states require that SLPs obtain only a single department of professional regulation license to practice in any setting. Indiana requires both a state professional license for practice in non-education settings and a teaching “license” for SLPs in school settings. Requiring an additional credential based on work setting places an undue burden on SLPs. Such requirements may impact the number of SLPs willing to practice in Indiana.

Other states use licensed SLP assistants (SLPAs) to deliver services in hard to staff areas. SLPAs that are appropriately educated, licensed, and supervised are able to help meet the demand for speech-language pathology services. While Indiana does not regulate SLPAs in education settings, SLPAs are registered in the state. Requirements that ensure SLPAs are properly licensed and supervised could be utilized to help mitigate shortages in schools.

ASHA Comments

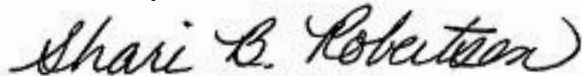
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ASHA urges you to work with the department of education, the Indiana Speech-Language-Hearing Association (ISHA), and ASHA to develop meaningful solutions that will address the shortages of qualified SLPs and ensure that children with communication disorders will receive the services they deserve.

Thank you for your consideration. If you or your staff have any questions, please contact Janet Deppe, ASHA's director of state affairs, at [jdeppe@asha.org](mailto:jdeppe@asha.org).

Sincerely,

A handwritten signature in cursive script that reads "Shari B. Robertson".

Shari B. Robertson, PhD, CCC- SLP  
2019 ASHA President

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<sup>1</sup> U.S. Department of Education. (2017). *Individuals with Disabilities Education Act: Section 300.156 Personnel Qualifications*. Retrieved from <https://sites.ed.gov/idea/regs/b/b/300.156>.

<sup>2</sup> Ibid.

<sup>3</sup> U.S. Department of Labor (2018). *Bureau of Labor Statistics: Occupational Outlook Handbook- Speech-Language Pathologists*. Retrieved from <https://www.bls.gov/ooh/healthcare/speech-language-pathologists.htm>.

<sup>4</sup> U.S. Department of Labor (2018). *Bureau of Labor Statistics: Occupational Employment and Wages, May 2017 29-1127 Speech-Language Pathologists*. Retrieved from <https://www.bls.gov/oes/current/oes291127.htm>.

<sup>5</sup> The American Speech-Language-Hearing Association. (n.d). *ASHA State by State requirements*. Retrieved from <https://www.asha.org/advocacy/state/>.