



September 18, 2019

David Linn
Board of Examiners for Speech-Language Pathology and Audiology
800 NE Oregon St., Suite 445
Portland, OR 97232

RE: Proposed Speech-Language Pathology Assistant Regulations

Dear Mr. Linn:

On behalf of the American Speech-Language-Hearing Association, I write to provide comments on the proposed regulations for speech-language pathology assistants (SLPAs).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 2,200 ASHA members reside in Oregon.

ASHA has developed a certification program for speech-language pathology assistants that will begin accepting applications in the later part of 2020. The following recommendations align with this program.

Section 335-095-0030

Certification of Speech-Language Pathology Assistants (SLPA)

(b) For clinical fieldwork, ASHA recommends specifying 80 hours direct client/patient/student services under the supervision of an ASHA certified speech-language pathologist (SLP) and 20 hours of indirect client/patient/student services under the supervision of an ASHA-certified SLP.

(4)(c) For professional development, ASHA recommends adding a one-hour ethics course, a one-hour universal safety precautions course, and a two-hour patient confidentiality course (i.e., HIPPA, FERPA).

Section 335-095-0040

Qualifications for Supervising SLPAs

(2)(a) ASHA recommends deleting "the clinical post-graduate fellowship year may be counted as one year of professional experience". ASHA supports two years of professional speech-language pathology work experience post completion of the graduate degree and clinical fellowship prior to supervising an SLPA.

Section 335-095-0050

Requirements for Supervising Licensed SLPAs

(1)(a) and (b)

ASHA recommends adding deleted language that specifies the types of supervision, including percentages, for the first 90 calendar days and subsequent to the first 90 calendar days. We also recommend adding the following to this definition "Direct supervision does not include reviewing a taped session at a later time."

(7)(a) and (b) ASHA recommends:

- removing the allowance of a one-year exemption from certain requirements for supervision of certified SLPs;
- removing the allowance under the exemption language in (a) and (b) for remote supervision; and
- changing the supervision from four full-time equivalent certified SLPAs to two full-time equivalent certified SLPAs for all settings. Video conferencing could be allowed under direct supervision in these remote areas.

Section 335-095-0060

Scope of Duties for the SLPA

(1)(b) ASHA recommends changing “providing feeding” to “demonstrating feeding strategies.” Providing feeding therapy is not in the ASHA scope of practice for SLPAs.

ASHA recommends a further break down of (1)(b) to state:

- as deemed appropriate by the supervising SLP, provide direct treatment to fragile clients/patients/students to meet communication needs; and
- program and provide instruction in the use of augmentative and alternative communication devices as deemed appropriate by the supervising SLP.

ASHA recommends adding the following per ASHA’s scope of practice and certification requirements for SLPAs:

- Exhibit compliance with the Health Insurance Portability and Accountability Act (HIPAA) and Family Educational Rights and Privacy Act (FERPA) regulations, reimbursement requirements, and SLPAs’ responsibilities.
- Present primary prevention information to individuals and groups known to be at risk for communication disorders and other appropriate groups; promote early identification and early intervention activities.
- Advocate for individuals and families through community awareness, health literacy, education, and training programs to promote and facilitate access to full participation in communication, including the elimination of societal, cultural, and linguistic barriers.
- Provide information to emergency response agencies for individuals who have communication and/or swallowing disorders.
- Advocate at the local, state, and national levels for improved public policies affecting access to services and research funding.
- Participate actively in professional organizations.

Not in Scope of Duties

ASHA recommends adding:

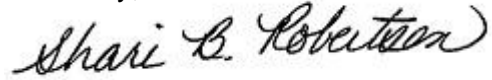
- Tabulate or interpret results and observations of feeding and swallowing evaluations performed by SLPs.
- Develop or determine the swallowing strategies or precautions for patients, family, or staff.
- Design or select augmentative and alternative communication systems or devices.

This language is consistent with ASHA’s scope of practice for SLPAs.

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ASHA appreciates your consideration of our comments on the proposed SLPA regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

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

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

cc: Erin Haag, Executive Director