



March 12, 2019

The Honorable Brad Little
Office of the Governor
State Capitol Building
Boise, ID 83702-0057

RE: Executive Order 2019-01-Review of Idaho Occupational Licensing Requirements

Dear Governor Little:

On behalf of the American Speech-Language-Hearing Association, I write to express strong support for the maintenance of the current licensure requirements for audiologists and speech-language pathologists (SLPs) in Idaho.

The American Speech-Language-Hearing Association (ASHA) is the professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. SLPs identify, assess, and treat speech and language problems, including swallowing disorders. Over 900 ASHA members reside in Idaho.

Regulatory oversight legislated through licensure is the accepted practice for consumer protection. Regulatory boards, including audiology and speech-language pathology boards in all 50 states and the District of Columbia, consist of a majority of practitioners of the profession being regulated and a substantial minority of consumers of the services provided by the regulated profession. The practitioners ensure that board decisions are soundly based on the technical and scientific knowledge required to practice, as applied to individual patient care situations. The public can rely on the expertise and wisdom of practicing professionals to ensure that those in practice are held to the highest standards of the profession. **Therefore, we urge you to continue to require licensure for audiologists and SLPs through the Bureau of Occupational Licenses, Speech, Hearing, and Communication, Services Licensure Board.**

Background on Audiology and Speech-Language Pathology

Audiology Professional Qualifications

Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments that determine

hearing loss, auditory function, balance and related systems, and evaluate, select, and dispense hearing aids. Audiologists also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices.

Speech-Language Pathology Professional Qualifications

SSLPs are highly skilled professionals who, at minimum, hold a master's degree in communication disorders from an accredited program recognized by the U.S. Department of Education. SLPs complete a challenging education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. SLPs assess, treat, and help prevent a variety of communication disorders involving speech, language, fluency (e.g., stuttering), voice and resonance problems, cognitive communication disorders such as memory, attention and problem-solving disorders, and swallowing and associated feeding disorders. SLPs provide services in a variety of practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

ASHA Certification: Certificate of Clinical Competence

ASHA certification ensures competencies for audiologists and SLPs. The Certificate of Clinical Competence (CCC) is earned through a voluntary certification process; therefore, the requirements of certificate holders are only applicable to those who choose to be certified. ASHA has no legal recourse against those who violate the ASHA Code of Ethics other than to revoke their certification. In the absence of state authority over the practice of audiology and speech-language pathology, an individual may continue to practice despite unethical or incompetent service. To maintain their certification, audiologists and SLPs must complete professional development activities every three years.

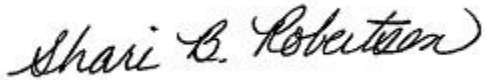
Licensure and ASHA Certification

Both licensure and ASHA certification help ensure the quality provision of audiology and speech-language pathology services. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice. ASHA's certification is the fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A) and SLPs (CCC-SLP). Individuals holding the CCCs are expected to abide by ASHA's Code of Ethics. While licensure is important for internal professional recognition and external accountability, licensure is necessary to ensure that providers maintain minimum standards and the public is protected from harm.

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We appreciate your consideration of our position on maintaining current licensure requirements. 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