



ASHA
American
Speech-Language-Hearing
Association

February 25, 2020

The Honorable Susan Lotine
Chair
House Health and Insurance Committee
Colorado House of Representatives
200 E. Colfax, Room 307
Denver, CO 80203

RE: House Bill 20-1219

Dear Chairwoman Lotine:

On behalf of the American Speech-Language-Hearing Association, I write to express opposition to HB 20-1219 as currently written, which combines the audiology practice act and the hearing aid provider practice act.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,000 ASHA members reside in Colorado.

ASHA supports continued licensure for audiologists, scope of practice protections (including title protection), and licensure by endorsement for those with substantially equivalent licenses in other states that are provided in HB 20-1219.

ASHA does not support combining the audiology practice act with the hearing aid provider practice act as the professional qualifications to practice are not equivalent; however, ASHA does recommend combining the audiology and speech-language pathology practice act.

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.

To be eligible for the ASHA Certificate of Clinical Competence (CCC), audiologists must also meet the following requirements:

- A passing score, determined by a cut score analysis, on a national examination administered and validated by the Educational Testing Service.
- Completion of 30 hours of professional development activities every three years.

Hearing Aid Provider Qualifications

In Colorado, hearing aid dispensers are required to pass an exam and hold either an associate degree in hearing aid fitting and dispensing or pass an exam and acquire six months of training.

ASHA does not support the language in HB 20-1219, which would combine the audiology practice act and the hearing aid provider practice act. Given the wide differences in education standards, training requirements, and scopes of practice, ASHA maintains that such a combination is professionally inappropriate. In fact, only three states continue to combine audiologists and hearing aid providers (also known as dispensers in many states) in their practice acts.

ASHA recommends that HB 20-1219 maintain the language that extends the licensing of audiologists but delete the language combining them with hearing aid providers. ASHA also recommends combining the audiology and speech-language pathology practice acts at the appropriate time in the future. Thirty-four states currently combine their audiology and speech-language pathology boards. Both audiologists and speech-language pathologists (SLPs) are highly educated and trained and share a common vision to meet the complex needs of individuals with communication disorders.

Speech-Language Pathology Qualifications

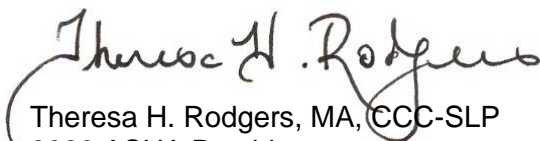
SLPs are uniquely educated and trained to assess and treat speech, language, swallowing, and cognitive communication disorders in children and adults. These services help children acquire language and enable people to recover essential skills to communicate about their health and safety, to swallow adequate nutrition safely, and to have sufficient attention, memory, and organizational skills to function in their environment.

SLPs complete a comprehensive education program that meets rigorous standards of practice based on objective methodology, which includes the following:¹

- A master's or doctoral degree with 75 semester credit hours in a course of study addressing the knowledge and skills pertinent to the field of speech-language pathology, as determined, validated, and systematically updated using a skills validation process.
- A minimum of 400 clock hours of supervised clinical experience in the practice of speech-language pathology, with supervision provided by individuals holding the ASHA CCC.
- A passing score, determined by a cut score analysis, on a national examination administered and validated by the Educational Testing Service.
- Completion of a supervised Clinical Fellowship to meet the requirements of the CCC, the recognized standard in the field.
- Completion of 30 hours of professional development activities every three years.

Thank you for your consideration of ASHA's position on HB 20-1219. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org

Sincerely,



Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President

¹ American Speech-Language-Hearing Association. (2020). *2020 Standards and Implementation Procedures for the Certificate of Clinical Competence in Speech-Language Pathology*. Retrieved from <https://www.asha.org/certification/2020-slp-certification-standards/>