



Submitted via e-mail: rboyd@house.ms.gov

March 12, 2020

The Honorable Randy Boyd, Chair
Accountability, Efficiency, and Transparency Committee
Room: 400-E
P. O. Box 1018
Jackson, MS 39215

RE: HB 1104

Dear Chairman Boyd:

On behalf of the American Speech-Language-Hearing Association, I write to express opposition to HB 1104, which expands the authority of the Occupational Licensing Review Commission to sunset any existing occupational regulation in Mississippi.

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 1,800 ASHA members reside in Mississippi.

ASHA opposes HB 1104 because the unintended consequences of “invalidating” occupational regulations will restrict consumer access to appropriate audiology and speech-language pathology services by reducing the number of licensed professionals practicing in the state. In addition, invalidating consumer protection regulations allows an unlicensed individual to provide services without meeting education or training requirements. Reducing or eliminating these requirements will impact consumer safety.

If this legislation does move forward, ASHA strongly recommends that the commission be required to solicit the input of audiologists and speech-language pathologists (SLPs) when reviewing any regulation affecting these professions. In the current version of the bill, the commission is not required to consult with any professional experts when conducting its regulatory review. ASHA maintains that having representatives who currently sit on the Mississippi Speech-Language Pathology and Audiology Advisory Council is critical because they possess the expertise to assess the ongoing needs of these professions best.

Regulatory Oversight Is Needed for Consumer Protection

The regulatory oversight provided by professional licensing agencies and boards is the accepted practice for consumer protection. The Mississippi Department of Health’s Division of Professional Licensure consists of both practitioners from the professions and consumers. Working in consultation with the Speech-Language Pathology and Audiology Advisory Council, the Department ensures that regulatory decisions are based on the technical and scientific knowledge required to practice. The public can rely on the expertise and wisdom of practicing professionals to ensure that those in practice are held to the high standards of the profession.

Autonomous Practice

Audiologists and SLPs are autonomous professionals that work directly with clients, patients, and students, making independent judgments regarding the assessment and treatment of an individual's communication disorder. Audiologists earn a clinical doctoral degree, complete over 1,800 hours of clinical training, and must pass a national exam. SLPs are highly skilled professionals with a minimum of a master's degree in communication disorders, completion of a supervised clinical fellowship, and passage of a nationally standardized examination.

The independent practice of the professions is fully supported and regulated by state licensing entities in all 50 states and the District of Columbia. All licensing boards recognize and value the autonomous practice of audiologists and SLPs. Licensure is designed to protect consumers from harm by:

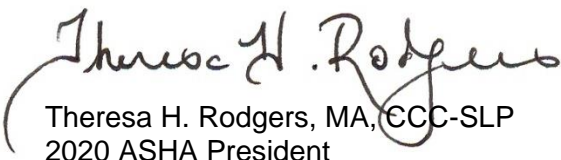
- helping consumers identify the differences between audiologists, SLPs, and other persons providing services (e.g., paraprofessionals, teachers, hearing aid dispensers);
- ensuring that only those with the appropriate qualifications and training can provide audiology and speech-language pathology services;
- deterring the hiring or substitution of others who do not meet the identified criteria for professional practice;
- deterring unethical behavior;
- increasing access to and reimbursement from third-party insurers;
- providing the necessary authority to intervene in cases of provider misconduct; and
- providing a venue for consumers and professionals to seek redress, including censure of individuals who have committed fraud or engaged in otherwise unethical behavior.

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 or those acting in an unethical manner so that they may be removed from practice. ASHA's Certificate of Clinical Competence (CCC) 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 to perform our work legally, certification is important for internal professional recognition and external accountability.

Thank you for your consideration of ASHA's position on HB 1104. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at tboyd@asha.org.

Sincerely,



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