



February 23, 2021

The Honorable Regina E. Cobb  
Arizona House  
Room 222  
1700 West Washington Street  
Phoenix, AZ 85007

RE: ASHA Comments on Telehealth; HB 2454

Dear Representative Cobb:

On behalf of the American Speech-Language-Hearing Association, I write to support House Bill 2454 with amendments, which further defines telehealth services and reimbursement.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,100 ASHA members reside in Arizona.<sup>1</sup>

As the leading national organization for the certification and advancement of audiologists and speech-language pathologists (SLPs), ASHA supports the development and use of telepractice or telehealth. ASHA maintains a collection of professional practice documents, including a position statement that defines telehealth as “the application of telecommunications technology to deliver professional services at a distance by linking clinician to client, or clinician to clinician for assessment, intervention, and/or consultation.”

These documents include a technical report and service delivery guidelines that may be accessed on ASHA’s website at <http://www.asha.org/Practice-Portal/Professional-Issues/Telepractice/>.

Research demonstrates the equivalence of telehealth to in-person service delivery for a wide range of diagnostic and treatment procedures for adults and children.<sup>2</sup> Studies have shown high levels of patient, clinician, and parent satisfaction supporting telehealth as an effective alternative to the in-person model for delivery of care.<sup>3</sup> Telehealth expands practitioners’ availability to those in need—regardless of geographic location—saving time and resources for both the provider and the patient.

In Section 36-3606: Interstate telehealth services; registration; requirements; venue; exceptions, ASHA recommends adding the following clarifying language:

“Health care providers who provide telehealth services to a person located in this state under this section are not eligible to be part of an interstate compact adopted in this state.”

This language is needed as many states move forward in passing interstate compact legislation for audiologists and SLPs.

Despite proven benefits, telehealth remains underutilized nationwide within audiology and speech-language pathology due to a lack of clear state laws governing its use or mandating appropriate reimbursement for services delivered. Providing additional clarifications allowing health care providers to offer their services via telehealth will further support the health care needs of Arizona residents during the COVID-19 pandemic and into the future.

Thank you for your consideration of ASHA's position to support HB 2454 with amendments. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,



A. Lynn Williams, PhD, CCC-SLP  
2021 ASHA President

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<sup>1</sup> American Speech-Language-Hearing Association. (2020). *Arizona* [Quick Facts].  
<https://www.asha.org/siteassets/uploadedfiles/Arizona-State-Flyer.pdf>.

<sup>2</sup> Grogan-Johnson, S., Alvares, R., Rowan, L., & Creaghead, N. (2010). A pilot study comparing the effectiveness of speech language therapy provided by telemedicine with conventional on-site therapy. *Journal of Telemedicine and Telecare*, 16, 134–139.

<sup>3</sup> Ibid.