

February 6, 2019

The Honorable Takashi Ohno  
Chair, House Intrastate Committee  
Hawaii State Capitol, Room 435  
Honolulu, HI 96813

Re: House Bill 252

Dear Representative Ohno:

On behalf of the American Speech-Language-Hearing Association, I write in support of the proposed provisional license for speech pathologists in HB 252.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 500 of our members reside in Hawaii.

A provisional license would provide an acceptable credential to allow individuals completing the clinical fellowship, but are not yet eligible for initial licensure, to qualify under federal Medicaid regulations (42 CFR, Ch. IV, Sec. 440.120(iii)) to provide services to individuals with communications disorders. This is an important consideration in light of growing demand for health care services and provider shortages, including audiologists and speech-language pathologists.

ASHA applauds the inclusion of a requirement that the supervisor of the provisional licensee be a licensed speech pathologist and possess their ASHA Certificate of Clinical Competence (CCC). This will allow the provisional licensee to obtain their ASHA certification upon completion of their clinical fellowship.<sup>1</sup>

ASHA has deemed the clinical fellowship to be an essential part of the certification process and the majority of states (including Hawaii) have adopted the clinical fellowship requirement as a qualification for initial licensure.<sup>2</sup>

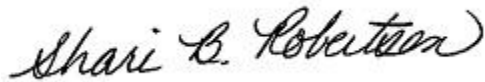
In order to successfully complete the clinical fellowship experience and qualify for ASHA's CCC, the clinical fellow must complete the following requirements:

- 36 weeks of full-time (35 hours per week) experience (or the equivalent part-time experience), totaling a minimum of 1,260 hours. Part-time work can be used to satisfy this requirement, as long as the clinical fellow works more than 5 hours per week. Working more than 35 hours per week will not shorten the minimum requirement of 36 weeks.

- Mentoring by an individual holding ASHA certification in speech-language pathology.
- A score of "3" or better on the core skills in the final segment of the experience, as rated by the clinical fellow mentor using the SLP Clinical Fellowship Skills Inventory form.<sup>3</sup>
- 80% of the fellow's time must be spent in direct clinical contact (assessment/diagnosis/evaluation, screening, treatment, report writing, family/client consultation, and/or counseling) related to the management of disorders that fit within the ASHA Model Speech and Language Pathology Scope of Practice.
- Submission of an approvable clinical fellowship report and rating form.

Thank you for the opportunity to provide comments on HB 252. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,



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

---

<sup>1</sup> The American Speech-Language-Hearing Association. (n.d.). *Speech-Language Pathology Clinical Fellowship*.

Retrieved from <https://www.asha.org/certification/Clinical-Fellowship/>.

<sup>2</sup> The American Speech-Language-Hearing Association. (n.d.). *Clinical Fellowship Inventory (CFSI) Speech-Language Pathology*. Retrieved from <https://www.asha.org/uploadedFiles/CFSISLP.pdf>.

<sup>3</sup> The American Speech-Language-Hearing Association. (n.d.). *Scope of Practice in Speech-Language Pathology*.

Retrieved from <https://www.asha.org/policy/sp2016-00343/>.