

March 28, 2025

The Honorable Melissa Murray
Senate Health and Human Services Committee
82 Smith Street
Providence, RI 02903

RE: S. 471

Dear Chairwoman Murray:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to comment on Senate Bill 471, which registers speech-language pathology assistants (SLPAs) and removes the ASHA Certificate of Clinical Competence (CCC) as a requirement for licensure renewal.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 800 ASHA members reside in Rhode Island.¹

Section 5-48.2-8 Support Personnel

ASHA supports the education options in the bill for SLPAs. However, we recommend adding the underlined language and deleting the language in red:

(2) Complete **twenty (20)** one-hundred (100) clinical hours **of observation of clinical practice** with a licensed speech language pathologist.

Scope of Practice

For the scope allowances section below, we recommend adding the underlined language:

(2) (b) Scope of practice of speech-language pathology assistants. A licensed speech-language pathology assistant shall only engage in those duties that adhere to the code of ethics of the board and are planned, designed, and supervised by a licensed speech-language pathologist, including:

Developing low-tech augmentative and alternative communication materials for students, patients, and clients.

For the scope prohibited section below, we recommend adding the underlined language:

(2) (c) A speech-language pathologist assistant shall not engage in the practice of speech-language pathology, including the following:

Selecting augmentative and alternative communication systems or devices;

Treating medically fragile students, patients, and clients without 100% direct supervision by a licensed speech-language pathologist.

These changes would be consistent with the recommendations of ASHA's SLPA scope of practice.²

Licensure vs Registration

We recommend adding the underlined language and deleting the language in red:

(13) (d) A speech-language pathology assistant (SLPA) shall be ~~registered~~ licensed at the department and be required to ~~re-register~~ renew their license every two (2) years.

This would be consistent with the licensure reference in (2) (b). ASHA recommends licensure as the standard for SLPAs. Currently, only seven states nationwide require registration for support personnel working outside of school settings, while 17 states require licensure.

Section 5-48.2-9 Supervision and Responsibility

Concerning (a) (1), which removes the requirement that the supervising SLP or audiologist have their CCC, without this, SLPAs will not have the option to apply for ASHA's assistant certification.

This section also required the supervising SLP or audiologist to have been actively working in the field for twenty-four (24) months after completion of the postgraduate professional experience. ASHA only requires the supervising SLP to have completed at least nine months of experience after being awarded their ASHA CCC (i.e., completion of the nine-month Clinical Fellowship followed by nine months of experience).

Regarding SLPAs, we recommend adding the language below to this section:

Before the SLPA begins to provide support independently, the supervising SLP must have first contact with all individuals on the caseload. First contact includes establishing rapport, gathering baseline data, and securing other necessary documentation to begin (or continue) the plan of care for the student, patient, or client.

Concerning the current bill language below for professional development for the SLP supervisor, the frequency of the requirement should be specified:

(a)(2)(v) Complete a minimum of two (2) hours of professional development in clinical instruction/supervision.

ASHA supports the telesupervision provisions of the bill. Currently, the bill recommends percentages for both direct and indirect supervision. ASHA no longer recommends percentages and instead states:

Frequency and type of supervision should be based on the SLPA's competencies and the caseload need, both of which are determined by the supervising SLP.

Additional Language

ASHA recommends adding the following title protection language:

No person shall hold themselves out to be, or use the title speech-language pathology assistant, unless they are licensed by the state to practice as such.

ASHA also recommends providing language to address how Rhode Island will accept those coming from other states with equivalent standards.

Removal of ASHA Certification for License Renewal

ASHA understands that state licensure boards determine licensure standards that best protect their consumers. The CCC is a nationally recognized professional credential that represents a level of excellence in the fields of audiology and speech-language pathology. ASHA's CCC offers indicators of quality and training that may not always be consistently required across states, including compelling certificate holders to abide by an ethical code of conduct and requiring professional development in ethics and ethical decision making, as well as cultural competency, cultural humility, culturally responsive practice, and diversity, equity, and inclusion.

ASHA is confident that the current standards set forth in Rhode Island licensure assure consumers continued access to high-quality providers and speech-language pathology services that are maintained from initial licensure throughout the maintenance of their state licenses.

Summary

Licensing appropriately trained and supervised SLPAs can help alleviate staff shortages and address the critical needs of those with communication and related disorders. By maintaining current renewal standards for SLPs, the state is ensuring continued ethical and culturally responsible practice.

Thank you for considering ASHA's comments on Senate Bill 471. 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. B. Mayfield-Clarke, PhD, CCC-SLP
2025 ASHA President

¹ American Speech-Language-Hearing Association. (2023). *Rhode Island* [Quick Facts].
<https://www.asha.org/siteassets/advocacy/state-fliers/rhode-island-state-flyer.pdf>

² American Speech-Language-Hearing Association. *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*.
<https://www.asha.org/policy/slpa-scope-of-practice/>