

April 10, 2025

Ms. Megan McMinn  
Bureau Chief  
Bureau of Licensing for Professions and Occupations  
Arizona Department of Health Services  
150 North 18th Avenue, Suite 410  
Phoenix, AZ 85007

RE: Speech-Language Pathology Assistant Regulations

Dear Ms. McMinn:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to comment in support of the proposed regulations clarifying the existing licensing requirements for speech-language pathology assistants (SLPAs).

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 3,600 ASHA members reside in Arizona.<sup>1</sup>

Between 2020 and 2030, Arizona is expected to have a 55% increase in demand for SLPs.<sup>2</sup> We believe continuing to license appropriately trained and supervised SLPAs can help to address this increased demand, alleviate staff shortages, and tackle the critical needs of those with communication and related disorders. As such, we offer the following recommended changes to the proposed legislation.

## **R9-10-502**

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### **Initial Application**

We support the option of using ASHA's SLPA certification as a pathway option for SLPA licensure. However, we recommend adding the underlined language and deleting the language in red as ASHA does not offer a certification number:

6.a. Documentation of a valid Speech-Language Pathology Assistant Certification from the American Speech-Language-Hearing Association, including the account ~~certification~~ number;

ASHA supports the 100 hours of clinical interaction under a licensed SLP listed below. However, we recommend adding the underlined language to the end of this section to offer the SLPA more flexibilities:

6.b.ii. Documentation, signed by a licensed speech-language pathologist as required in A.R.S. § 36-1940.04 who provided supervision to the applicant, confirming the applicant's completion of at least 100 hours of clinical interaction that did not include observation;

Clinical hours may be completed via a clinical practicum or on the job under the supervision of a licensed speech-language pathologist.

If the SLP supervisor has their ASHA Certificate of Clinical Competence (CCC), this would align with the requirements and offer a pathway for an SLPA to apply for ASHA's SLPA certification.

### **Additional Language**

ASHA recommends adding the following title protection language to these regulations:

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 supports the use of telesupervision and recommends adding the following clarifying language to these regulations:

Direct supervision can include the supervising SLP viewing and communicating with the SLPA via telecommunication technology as the SLPA provides clinical services. Direct supervision does not include reviewing an audio or video recorded session later.

Indirect supervision is the monitoring or reviewing of an SLPA's activities outside of observation and guidance during direct services provided to a student, patient, or client. Indirect supervision activities performed by the supervising SLP may include, but are not limited to, demonstration, records review, review and evaluation of audio or video recorded sessions, and interactive conferences that may be conducted by telephone, email, or other forms of telecommunication.<sup>3</sup>

Thank you for considering ASHA's comments on the SLPA regulations. 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,



A. B. Mayfield-Clarke, PhD, CCC-SLP  
2025 ASHA President

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

<sup>2</sup> Ibid

<sup>3</sup> American Speech-Language-Hearing Association. (2022). *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <https://www.asha.org/policy/slpa-scope-of-practice/>