



September 16, 2022

Ms. Heather Olivares
Legislation/Regulation Analyst
California Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board
1601 Response Road, Suite 260
Sacramento, CA 95815

RE: Required Professional Experience and Telesupervision

Dear Ms. Olivares:

On behalf of the American Speech-Language-Hearing Association, I write in support of the proposed regulations on the use of telesupervision for the required professional experience (RPE) temporary licensees who are working under licensed audiologists and speech-language pathologists.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 16,000 ASHA members reside in California.¹

ASHA supports allowing telesupervision for up to half of the required monthly supervision requirements to provide enhanced flexibilities, which will greatly assist those who can benefit from audiology and speech-language pathology services from temporary licensed individuals in California who hold an RPE license. ASHA also supports the language requiring an RPE temporary license holder supervisor to inform the patient about the use of telesupervision and obtain prior verbal or written consent.

The proposed regulations will satisfactorily address current confusion regarding the use of telesupervision for the RPE licensees who are working under licensed audiologists and speech-language pathologists. During the COVID-19 related state of emergency, ASHA received many requests for assistance from RPE supervisors who were concerned about their ability to continue to practice and offer supervision remotely. After the emergency waiver to provide remote supervision expired, ASHA continued hearing from RPE temporary licensees and their licensed supervisors expressing their frustrations and inability to provide ongoing services to those in need.

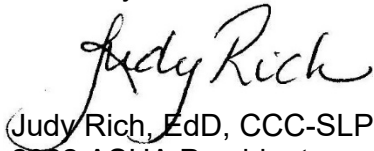
As the leading national organization for the certification and advancement of audiologists and speech-language pathologists, ASHA supports the development and use of telehealth. ASHA maintains a collection of professional practice documents, including a position statement that defines telehealth as “the 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.” Despite proven benefits, telehealth remains underutilized within audiology and speech-language pathology due to a lack of

September 16, 2022
Page 2

clear state laws governing its use or mandating appropriate reimbursement for services delivered.

Thank you for your consideration of ASHA's comments regarding the proposed regulations for RPE temporary license holders and telesupervision. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Judy Rich". The signature is written in a cursive style with a large, looping initial "J".

Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President

¹ American Speech-Language-Hearing Association. (2022). *California* [Quick Facts].
<https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/california-state-flyer.pdf>