



March 22, 2023

Ms. Marcia Raggio, Chair
Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board
1601 Response Road, Suite 260
Sacramento, CA 95815

RE: SLPA Supervision and Telepractice

Dear Ms. Raggio:

On behalf of the American Speech-Language-Hearing Association, I write to express support for the proposed regulations addressing speech-language pathology assistant (SLPA) supervision and telepractice.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 15,000 ASHA members reside in California.¹

ASHA supports the provision of services by electronic means for SLPAs who are appropriately supervised by an ASHA certified, licensed SLP. Supervision by an ASHA certified and licensed SLP will enable the SLPA to qualify for ASHA's Assistant Certification.²

ASHA staff have received many calls and emails from practitioners needing to supervise SLPAs remotely and their inability to do this because of the lack of regulations in this area. With the shortage of practitioners and the ever-growing demand for services, there is an increasing need for this flexible model of service provision. ASHA supports the clarifications around direct supervision to address this. In accordance with ASHA's SLPA Scope of Practice, ASHA recommends 100% direct supervision (including synchronous or live telesupervision) of SLPA for medically fragile students, patients, and clients.³

ASHA's revised SLPA scope of practice also now recommends that the amount and type of supervision required must be consistent with (a) the SLPA's skills and experience; (b) the needs of the students, patients, and clients; (c) the service setting; (d) the tasks assigned; and (e) the laws and regulations that govern SLPAs rather than calling for specific percentages. The SLP can adjust the amount of supervision if they determine that the SLPA has met appropriate competencies and skill levels in treating students, patients, and clients who have a variety of communication disorders.

Determining the SLP to SLPA supervision ratio will depend on a variety of factors including caseload characteristics, SLPA experience, and SLP experience. The SLP is responsible for determining how many SLPAs can be supervised while maintaining the highest level of quality for services provided. At this time, no state allows the supervision of up to six support personnel, which is included in the proposed changes.⁴

Thank you for helping to ensure appropriate SLPA supervision, including the use of telesupervision, which will contribute to the expansion of services to those most in need in California. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,



Robert M. Augustine, PhD, CCC-SLP
2023 ASHA President

¹ American Speech-Language-Hearing Association. (2022). *California* [Quick Facts].

<https://www.asha.org/siteassets/advocacy/state-fliers/california-state-flyer.pdf>

² American Speech-Language-Hearing Association Assistants Program. (n.d.). Become a Certified Speech-Language Pathology Assistant (SLPA). <https://www.ashaassistants.org/pathways-speech-language-pathology-assistant/>.

³ American Speech-Language-Hearing Association. (2022). Speech-language pathology assistant scope of practice [Scope of Practice]. www.asha.org/policy.

⁴ American Speech-Language-Hearing Association. (n.d.). Support Personnel Excluding School Settings.

<https://www.asha.org/siteassets/uploadedfiles/support-personnel-excluding-school-settings.pdf>.