

July 2, 2025

Mr. Doug Jennings
General Counsel
Texas Department of Licensing and Regulation
E.O. Thompson SOB
920 Colorado Street
Austin, TX 78701-02157

RE: Speech-Language Pathology, Audiology, and Assistants Licensing

Dear Mr. Jennings:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express support, with amendments, for the proposed clarifying regulations for speech-language pathologist (SLP), audiologist, and assistant licensing.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 18,200 ASHA members reside in Texas.¹

Comments Related to ASHA Scope of Practice

The ASHA Scope of Practice for the Speech-Language Pathology Assistant (SLPA) was developed by the ASHA Ad Hoc Committee. The Ad Hoc Committee included ASHA-certified SLPs and SLPAs with specific knowledge and experience working with/as support personnel in clinical practice in schools, health care, and/or private practice settings. ASHA's SLPA scope of practice addresses support for telesupervision, specifications around direct and indirect supervision, supervision ratios, clinical observation requirements, and continuing education requirements—all of which are addressed in this letter.

Comments on Proposed Clarifying Regulations

To ensure these regulations are implemented properly, we share the following comments and suggested amendments:

- **111.2. Definitions.** ASHA supports the telesupervision provisions for both direct and indirect supervision of the SLPA. ASHA also supports the licensing of SLPAs.
- **111.41 Intern in Speech-Language Pathology License—Internship and Supervision Requirements.** (5) “If the supervisor ceases supervision of the intern, the supervisor must [shall] notify the department, in a form and manner prescribed by the department, and must [shall] inform the intern to stop practicing immediately. The supervisor is responsible for the practice of the intern until the intern is removed from the supervisor's license [notification has been received by the department]. The supervisor is responsible for verifying the removal.” ASHA believes that the board should be notified within a reasonable number of days of the change of supervisor so that the SLPA's ability to work is minimally impacted.

- **111.50. Assistant in Speech-Language Pathology License—Licensing Requirements—Education and Clinical Observation and Experience.** ASHA recommends deleting (b) and replacing it with the following revised sentence: “(b) Degree. A degree must be completed at a college or university holding accreditation or candidacy status from a recognized regional accrediting agency.” This change will address the issue of ASHA not accrediting undergraduate programs.

Clinical Observation. “(d) Clinical Observation and Experience. The applicant must have earned at least 25 hours of clinical observation in the area of speech-language pathology and 25 hours of clinical assisting experience in the area of speech-language pathology. (1) These hours must be obtained through an accredited college or university or in one of its cooperating programs. If these hours are not obtained, the applicant must complete the missing hours with the applicant's supervisor upon issuance of the assistant license as prescribed under subsection (e). (2) An applicant who held an assistant license in another state and completed hours for that license does not need to submit proof of completion of the 25 hours of clinical observation and 25 hours of clinical assisting experience.” The current proposed clinical experience recommends 50 hours, per its scope of practice, ASHA recommends 100 hours under the direct supervision of an ASHA-certified SLP.² ASHA also recommends having an option to complete these hours on the job if they are not part of the academic program.

“(f) In the event the degree, course work, or clinical observation and experience set out in this section were earned more than 10 years before the date of application for the assistant license, the applicant must submit proof of current knowledge of the practice of speech-language pathology to be evaluated by the department. Proof of current knowledge may include: completing at least 10 hours of continuing education or other courses within the last year; or holding a current license in another state.” ASHA’s scope of practice also recommends that SLPAs “actively” pursue continuing education and professional development activities.

- **111.51 Assistant in Speech-Language Pathology License—Supervision Requirements.** “(c) Assistant Supervision Plan. An assistant must practice under an assistant supervision plan. This plan must be submitted in a form and manner prescribed by the department.” ASHA is concerned that in the section above, the submission and review of the plans should be completed in a timely manner so that the SLPA’s ability to work is not impacted.
- **111.52 Assistant in Speech-Language Pathology License—Practice and Duties of Assistants.** ASHA recommends deleting (c) below and replacing it with the following: “Administering and scoring screenings for clinical interpretation by the SLP and administering and scoring assessment tools that (a) the SLPA meets the examiner requirements specified in the examiner’s manual and (b) the supervising SLP has verified the SLPA’s competence in administration, exclusive of clinical interpretation.”

“(c) (6) administer routine tests, if the test developer does not specify a graduate degreed examiner and the supervisor has determined the assistant is competent to perform the test.”

ASHA recommends deleting “Assistant SLP” or “SLP Assistant” below and replacing it with “SLPA,” the more commonly used term throughout the country.

“(g) Licensed assistants must use ‘Assistant SLP’ or ‘SLP Assistant’ to shorten their professional title. Licensed assistants may not use ‘SLP-A’ or ‘STA.’”

ASHA recommends deleting “Assistant” after C-SLP below as the title C-SLPA is trademarked by ASHA and is the recognized designation nationwide.

“(h) Licensed assistants who have earned their ASHA Speech-Language Pathology Assistant certification may use ‘C-SLP Assistant’ in the assistant's title, in addition to Assistant SLP, SLP Assistant, or the full professional title. The ‘C-SLP Assistant’ credential indicator is not a substitute for the use of the ‘Assistant SLP,’ ‘SLP Assistant,’ or the full professional title.”

- **111.154 Supervision Requirements.** “(4) comply with the following: (A) supervise no more than a total of four [(4)] speech-language pathology interns and/or assistants; or (B) supervise no more than a total of four [(4)] audiology interns and/or assistants.” ASHA recommends that the SLP supervise no more than three full-time equivalent SLPAs for any setting.
- **Transcripts and CCCs Verification.** 16 TAC 111.30 (b)(5), 111.35 (c)(4), 111.40 (b)(5), 111.45 (b)(5), 111.50 (b)(4), 111.55 (b)(4), 111.70 (c), 111.75 (c)(4): These statutory sections require an ASHA-approved transcript evaluation service. ASHA does not approve these services. ASHA certification applicants must submit a transcript evaluation conducted by a member of the National Association of Credential Evaluation Services.

16 TAC 111.30 (b)(6), 111.35 (c)(3), 111.40 (b)(6), 111.45 (b)(4), 111.70 (d), 111.75 (c)(3), 111.80 (c): These statutory sections indicate that an applicant can receive an ASHA verification of accepted course work and clinical experience for applicants. ASHA can only provide this verification if the applicant has applied for the ASHA Certificate of Clinical Competence (CCC).

Thank you for considering ASHA’s comments and suggested amendments on these proposed regulations. 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. (2024). *Texas* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-flyers/texas-state-flyer.pdf>

² 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/>