



January 29, 2025

The Honorable Holly Seibold
Virginia House of Delegates
General Assembly Building
201 North 9th Street
Richmond, VA 23219

RE: HB 2040

Dear Delegate Seibold:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express support for HB 2040, with amendments, which authorizes the licensure of speech-language pathology assistants (SLPAs).

ASHA is the national professional, scientific, and credentialing association for 234,000 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 4,900 ASHA members reside in Virginia.¹

Section 54.1-2620

C.1.(i) ASHA recommends adding “or” as clarifying language after this first education eligibility pathway so it is clear that 2 and 3 are additional options.

E. ASHA recommends adding the clarifying language underlined below and deleting the language in red:

In order to practice as a speech-language pathology assistant, an applicant for licensure shall complete a minimum of 100 hours of clinical field work, including (i) 80 hours of direct patient/client/student services under the supervision of a **certified** speech-language pathologist who holds their Certificate of Clinical Competence or meets equivalent standards and (ii) 20 hours of indirect patient/client/student services under the supervision of a **certified** speech-language pathologist who holds their Certificate of Clinical Competence or meets equivalent standards.

ASHA recommends adding a new letter to this section stating that direct supervision and indirect supervision of the speech-language pathology assistant will be defined via regulation. ASHA’s SLPA scope of practice defines direct supervision as “in-view observation and guidance by an SLP while the SLPA performs an assigned activity.” Direct supervision activities performed by the supervising SLP may include, but are not limited to, the following: observing a portion of the screening or treatment procedures performed by the SLPA, coaching the SLPA, and modeling for the SLPA. The supervising SLP must be present during all services provided to a medically fragile client by the SLPA (e.g., on-site or via synchronous telesupervision). The SLP can view and communicate with the student, patient, or client and SLPA via “real-time” telecommunication technology to supervise the SLPA, giving the SLP the opportunity to provide immediate feedback. This does not include reviewing a recorded session later.²

ASHA defines indirect supervision as “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 (e.g., virtual platforms).”³

ASHA also recommends that the bill specify that the ratio of SLPAs that may be supervised by an SLP will be defined in regulations. ASHA recommends that the supervising SLP should determine the appropriate number of assistants whose practice can be supervised within their workload. ASHA recommends that the SLP not supervise or be listed as a supervisor for more than three full-time equivalent SLPAs in any setting.

The telesupervision provisions in the bill, along with the recommended amendments above, will all provide additional flexibilities for both the SLPA and the SLP supervisor.

We believe licensed SLPAs who are appropriately trained and supervised can significantly alleviate provider shortages and help those in Virginia with communication-related disorders.

Thank you for considering ASHA’s comments on HB 2040. 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). *Virginia* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-fliers/virginia-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/>

³ 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/>