



June 28, 2024

Ms. Vickie Pullins, CCC-SLP
President
West Virginia Board of Examiners for Speech-Language Pathology and Audiology
99 Edmiston Way, Ste. 214, Box 11
Buckhannon, WV 26201

RE: Assistant Regulations

Dear Ms. Pullins:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express support, with recommended amendments, for the rules governing audiology assistants and speech-language pathology assistants (SLPAs) and their supervisors.

ASHA is the national professional, scientific, and credentialing association for 234,000 members, certificate holders, and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology assistants and SLPAs; and students. Over 1,100 ASHA members reside in West Virginia.¹ The following are ASHA's recommended amendments.

Recommended Changes to Allow for the Remote Supervision of Assistants

Under Sections 29-2-2 (Definitions), 4.1.0, and 7.1.9, a supervisor must be physically present for both direct and indirect supervision. We recommend adjusting both. As these definitions are currently worded, they don't allow the supervisor to adjust based on the skills and experience of the assistant. The level of supervision should be determined during the initial onboarding period. ASHA's guidance relating to assistants supports supervision, including remote supervision, based on the needs, competencies, skills, expectations, philosophies, and experience of the assistant and the supervisor; the needs of clients, patients, and students served; the service setting; and the tasks assigned.²

For audiology assistants under Sec. 7.1.9, we recommend this section include remote supervision by incorporating the following policy:

A licensed audiologist may remotely supervise an audiology assistant using real-time audio-visual telecommunication software that enables the patient and the audiology assistant to see and hear the audiologist and vice versa. Further, remote supervision should only be allowed if the supervising audiologist deems the assistant is capable of performing the duties without a licensed audiologist physically present.

For SLPAs under Sec. 4.1.0, we recommend incorporating the following policy:

To supervise the SLPA, the SLP should be able to communicate with the patient and SLPA in real time via telecommunication software (e.g., virtual platforms), webcam, telephone, or similar devices and services. Further, remote supervision should only be allowed if the supervising SLP deems the SLPA is capable of performing the duties without a licensed SLP physically present.

Additional Proposed Changes to the Regulations

Under Sec. 3.1.2, we recommend adding language specifying how the practicum hours are achieved. ASHA recommends providing the option of obtaining these hours via the academic practicum or on the job with a current/former licensed audiologist or SLP.

Under Sec. 4.1.2 and 7.1.2, the language should identify the specific supervision training. We recommend adding language requiring at least two hours of professional development in clinical instruction/supervision and the completion of a minimum of nine months of professional experience. This language would be consistent with the requirements of ASHA's assistants certification program.

Under Sec. 4.1 and 7.1, we recommend adding a requirement for supervisors to obtain continuing education to stay current with clinical standards for supervision. ASHA's guidance states that the supervisor is responsible for ensuring that they have the skills and competencies needed to provide appropriate supervision. This includes completing required continuing education in supervision and seeking additional continuing education to remain current in this area.

Under Sec. 4.1.3 and 7.1.3, ASHA asks the board to clarify what is meant by "participate significantly in the hiring of the assistant."

Under Sec. 4.1.10 and 7.1.9, we suggest deleting the language listing the specific types of facilities that an assistant may practice, as the list may not be all-inclusive and may cause confusion.

Under Sec. 4.1.8 and 7.1.7, ASHA asks the board to clarify what is meant by "weeks of treatment." As written, this term may cause confusion about how often supervisors are to have direct contact with each patient/client.

Under 7.1.19, the regulation incorrectly references an SLPA and needs to be changed to audiology assistant.

Thank you for considering ASHA's support, with recommendations, for the rules governing audiology assistants and SLPAs and their supervisors. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,



Tena L. McNamara, AuD, CCC-A/SLP
2024 ASHA President

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

² American Speech-Language-Hearing Association. (n.d.). *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <https://www.asha.org/policy/slpa-scope-of-practice/>.