



**ASHA**  
American  
Speech-Language-Hearing  
Association

February 11, 2019

The Honorable Anthony T. Kern  
Arizona House of Representatives  
1700 West Washington Street  
Phoenix, AZ 86007

Re: House Bill 2231

Dear Representative Kern:

On behalf of the American Speech-Language-Hearing Association, I write to oppose HB 2231, which proposes changes to the current licensing structure for the professions of audiology and speech-language pathology and creates an unnecessary additional certification title.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,000 of our members reside in Arizona.

Regulatory oversight, which is legislated through occupational licensure, is the accepted practice for consumer protection. Consumers rely on the expertise of staff in the Department of Health Services to ensure that those in practice are held to the highest standards of the profession. **ASHA urges you to continue to require licensure for both audiologists and speech-language pathologists through this Department.**

Private certification is the accepted standard for many professions and is the basis for audiology and speech-language pathology state licensure standards. State created certification would compete with private certification managed by professional organizations that have the knowledge and expertise to create requirements for certification and certification maintenance. State created certification programs would be responsible for ethical conduct, scope of practice, and oversight of professions, which could be difficult and costly for the state to manage. Creating an additional state certification could also cause unnecessary confusion for the consumer. **ASHA also opposes the creation of a government or state certification for those receiving continuing approval from the government.**

### **Background on Audiology and Speech-Language Pathology**

#### *Audiology Professional Qualifications*

Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments for hearing loss, auditory function, balance and related systems, and evaluate, select, and dispense hearing aids. Audiologists also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices.

#### *Speech-Language Pathology Professional Qualifications*

Speech-language pathologists (SLPs) are highly skilled professionals who, at minimum, hold a master's degree in communication disorders from an accredited program recognized by the

U.S. Department of Education. SLPs complete a challenging education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. SLPs assess and treat a variety of communication disorders involving speech, language, fluency (e.g., stuttering), voice and resonance problems, cognitive communication disorders such as memory, attention and problem-solving disorders, and swallowing and associated feeding disorders. SLPs provide services in a variety of practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

**ASHA Certification: Certificate of Clinical Competence**

ASHA certification ensures competencies for audiologists and speech-language pathologists. The Certificate of Clinical Competence (CCC) is earned through a voluntary certification process; therefore, the requirements of certificate holders are only applicable to those who choose to be certified. ASHA has no legal recourse against those who violate the ASHA Code of Ethics other than to revoke their certification. In the absence of state licensure over the practice of audiology and speech-language pathology, an individual may continue to practice despite unethical or incompetent service.

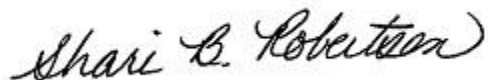
To maintain their certification, audiologists and SLPs must complete professional development activities every three years.

**Licensure and ASHA Certification**

Both licensure and ASHA certification help ensure the quality provision of audiology and speech-language pathology services. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice. ASHA certification is the fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A) and SLPs (CCC-SLP). Individuals holding the CCCs are expected to abide by ASHA's Code of Ethics. While, certification is important for internal professional recognition and external accountability, licensure is important to legally work and provides minimum standards of competency that protect consumers from harm.

ASHA appreciates this opportunity to convey the importance of maintaining licensure for health care professionals. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,



Shari B. Robertson, PhD, CCC-SLP  
2019 ASHA President