



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

February 9, 2018

The Honorable Rosalyn H. Baker  
Senate Committee on Commerce, Consumer Protection, and Health  
Hawaii State Capitol, Room 230  
Honolulu, HI 96813

Dear Senator Baker:

On behalf of the American Speech-Language-Hearing Association, I write to comments on the proposed provisional license for speech pathologists in SB 2263.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 191,500 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 500 of our members reside in Hawaii.

I applaud your introduction of this bill. However, I would like to recommend legislative language that addresses educational requirements, as well as legislative language that is designed to assist practitioners upon the expiration of their provisional license.

On page 1, Section 1, Chapter 468E, (a), (1), ASHA recommends removing the term “equivalent” for the bachelor’s and master’s degree. Speech-language pathologists (SLPs) complete a comprehensive education program that meets rigorous standards of practice based on objective methodology, which includes the following:

- A master’s or doctoral degree with a course of study addressing the knowledge and skills pertinent to the field of speech-language pathology, as determined, validated, and systematically updated using a skills validation process;
- A minimum of 400 clock hours of supervised clinical experience in the practice of speech-language pathology, with the supervision provided by individuals holding the ASHA Certificate of Clinical Competence (CCC);
- A passing score, determined by a cut score analysis, on a national examination administered and validated by the Educational Testing Service;
- Completion of a supervised Clinical Fellowship to meet the requirements of the CCC, the recognized standard in the field; and
- Completion of 30 hours of professional development activities every 3 years.

The term “equivalent” leaves the educational standard open to those who may not be adequately qualified to practice.

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On page 2, Section 1, Chapter 468E, (b), ASHA recommends that the supervising speech pathologist possess their ASHA Certificate of Clinical Competence (CCC). If the supervisor does not have their CCC, the provisional licensee will be unable to obtain their ASHA certification upon completion of their clinical fellowship.

Thank you for the opportunity to provide comments on SB 2263. 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,

A handwritten signature in cursive script that reads "Elise Davis-McFarland". The signature is written in black ink and is positioned above the typed name.

Elise Davis-McFarland, PhD, CCC-SLP  
2018 ASHA President