



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

February 22, 2018

The Honorable Brad Little
Office of the Lieutenant Governor
State Capitol Building
Boise, ID 83702-0057

RE: Review of Idaho Occupational Licensing Requirements

Dear Lieutenant Governor Little:

On behalf of the American Speech-Language-Hearing Association, I write to express strong support for the maintenance of the current licensure requirements for audiologists and speech-language pathologists in Idaho.

The American Speech-Language-Hearing Association (ASHA) is the professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists, speech-language pathologists and speech, language, and hearing scientists. Over 700 of our members reside in Idaho.

Audiology Professional Qualifications

Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments that determine 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. To maintain their certification, Certificate of Clinical Competence (CCC), audiologists must complete 30 hours of professional development activities every three years.

Speech-Language Pathology Professional Qualifications

Speech-language pathologists (SLPs) are highly skilled professionals with a minimum of a master's degree in communication disorders from accredited programs 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. To maintain their certification, Certificate of Clinical Competence (CCC) SLPs must complete 30 certification maintenance hours every three years.

Speech-Language Pathology Services and Practice Settings

SLPs assess, treat, and help prevent 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 number of different practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

Autonomous Practice

Audiologists and SLPs are autonomous professionals that work directly with clients/patients making independent judgments regarding the assessment and treatment of an individual's communication disorder. Graduate education provides audiologists and SLPs with the knowledge, skills and competencies to practice independently. The independent practice of the professions is fully supported and regulated by state licensing entities in all 50 states and the District of Columbia. All licensing boards recognize and value the autonomous practice of audiologists and SLPs.

Purpose of Licensure

Licensure is designed to protect consumers from harm.

Licensure:

- helps consumers identify the differences between audiologists, SLPs, and other persons providing services (e.g., paraprofessionals, teachers, hearing aid dispensers);
- ensures that only those with the appropriate qualifications and training can provide audiology and SLP services;
- deters the hiring or substitution of other workers who do not meet the identified criteria for professional practice;
- deters unethical behavior from professionals and employers such as over/under utilization, misrepresentation, and fraud;
- increases accessibility to and reimbursement from third party insurers;
- provides the necessary authority to intervene in cases of provider misconduct; and
- provides a venue for consumers and professionals to seek redress, including censure of individuals who have committed fraud or engaged in otherwise unethical behavior.

Potential for Harm

In the absence of licensure, patients must rely on the legal system to redress any of their grievances. It is likely that many individuals with communicative disabilities—predominantly children and older persons—will not be able, financially or otherwise, to launch or sustain effective legal action and have simply suffered in silence. The vulnerable population of persons with communicative disorders requires the protection of the state to ensure that competent and ethical providers provide quality care.

ASHA Certification: Certificate of Clinical Competence (CCC)

ASHA's certification process is voluntary; 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 authority over the practice of audiology and speech-language pathology, an individual may continue to practice despite unethical or incompetent service.

Licensure and ASHA Certification

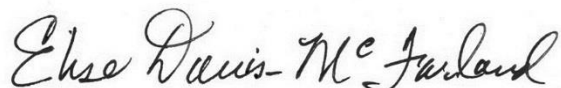
Both licensure and ASHA certification help ensure the quality provision of audiology and speech-language pathology services. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice.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

Regulatory Oversight Is Needed for Consumer Protection

Regulatory oversight legislated through licensure is the accepted practice for consumer protection. Regulatory boards, including SLP boards in the 50 states and the District of Columbia, consist of a majority of practitioners of the profession being regulated and a substantial minority of consumers of the services provided by the regulated profession. The practitioners ensure that board decisions are soundly based in the technical and scientific knowledge required to practice, as applied to individual patient care situations. The public can rely on the expertise and wisdom of practicing professionals to ensure that those in practice are held to the high standards of the profession. **Therefore, we urge you to continue to require licensure for audiologists and SLPs through the Bureau of Occupational Licenses, Speech, Hearing, and Communication, Services Licensure Board.**

Thank you for the opportunity to offer comments on the maintenance of the current licensure requirements. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,



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