



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

July 3, 2018

Mr. Jason Dietrich
Director of Educator Licensure
Department of Education
9890 S. Maryland Parkway
Las Vegas, NV 89183

RE: Proposed Regulations Impacting Speech-Language Pathologists

Dear Mr. Dietrich:

On behalf of the American Speech-Language-Hearing Association, I write to propose additional regulatory revisions to the Commission's standards for the field of speech-language pathology.

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; audiology and speech-language pathology support personnel; and students. Over 800 of our members reside in Nevada.

ASHA supports the Commission's recommendation to require a transcript indicating that an individual's coursework meets the requirement for a concentration in speech and language impairment as well as an endorsement to teach students with speech and language disorders. ASHA opposes existing language allowing an endorsement for those possessing a bachelor's degree as well as those who possess an undergraduate degree and have met student teaching requirements.

ASHA recommends that the requirement for a bachelor's degree be removed and language added to require: a master's degree in speech-language pathology, completion of a clinical practicum, passage of national exam, and completion of a clinical fellowship for those seeking future endorsements. Individual's possessing ASHA's Certificate of Clinical Competence (CCC) would meet all of these requirements. ASHA also recommends grandfathering in those who do not meet the new educational standard and are currently practicing in school settings in order to prevent vacancies in the schools.

Speech-language pathologists (SLPs) are highly skilled professionals with a minimum of a master's degree in communication disorders from an accredited programs recognized by the U.S. Department of Education. To obtain ASHA's CCC's, SLPs complete a challenging education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. To maintain their CCCs, SLPs must complete 30 certification maintenance hours of continuing education every three years.

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All 50 states and the District of Columbia require a master's degree for state licensure and 35 states require a masters' degree to obtain a teaching credential. A graduate degree is required for reimbursement by insurers including Medicaid.

ASHA urges you to amend the standard for speech-language pathologists in schools to reflect current standards for competent practice in speech-language pathology. Children in education settings deserve the same quality of services as those in other settings from highly skilled SLPs in order to achieve successful outcomes.

Thank you for the opportunity to offer comments on the proposed regulations. 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 handwritten signature in black ink that reads "Elise Davis-McFarland". The signature is written in a cursive, flowing style.

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