



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

Submitted via email to: paula.pullano@health.ri.gov

August 8, 2018

Paula Pullano
Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908-5097

RE: Amendments to Speech Pathologist and Audiologist Rules

Dear Ms. Pullano:

On behalf of the American Speech-Language-Hearing Association, I write to express concerns regarding the proposed amendments to the rules and regulations for speech pathologists and audiologists (216-RCR-40-05033).

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 700 of our members reside in Rhode Island.

ASHA is concerned with the current requirement of eighteen (18) hours of graduate credit and 25% practicum hours for speech-language pathologists. **ASHA recommends support personnel receive an associate's or bachelor's degree and 100 hours of supervised clinical experience to be completed at the educational institution or during the first year of employment.*** ASHA supports the use of trained and supervised support personnel but is concerned that the requirement of additional graduate hours and practicum experience prior to employment may limit the ability of support personnel to find positions in Rhode Island.

ASHA is also concerned with the proposed removal of the current requirement for support personnel to register with the State Board of Examiners in Speech-Language Pathology and Audiology. **ASHA maintains that support personnel, and their supervisors, should be registered with the Board in order to ensure individuals are qualified and competent to perform this occupation.**

Thank you for the opportunity to provide comments on this regulation. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,

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

*The American Speech-Language-Hearing Association. (2014). *Model Bill for State Licensure of Audiologists, Speech-Language Pathologists, and Audiology and Speech-Language Pathology Assistants*. Retrieved from <https://www.asha.org/uploadedFiles/State-Licensure-Model-Bill.pdf>.