



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

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

February 20, 2018

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

RE: Amendments to Registration of Music Therapists

Dear Ms. Pullano:

On behalf of the American Speech-Language-Hearing Association, I write to ask for your consideration of the following amendments to the proposed rules and regulations for the Registration of Music Therapists (26-RICR-40-05-26), which would change the scope of practice for music therapists.

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 650 of our members reside in Rhode Island.

ASHA respectfully requests the following changes to the proposed regulations:

- Remove the proposed incorporated materials. These materials, which comprise the American Music Therapy Association and Certification Board for Music Therapy Scope of Practice, and associated domains broadly defines music therapy and states that music therapists can assess sensory, physical, and cognitive and communication abilities. ASHA maintains that a profession's scope of practice is limited to specific competencies acquired through education, training, and practical experience. Unlike speech-language pathologists (SLPs), music therapists are not subject to the same rigorous qualification standards, and do not acquire the skills necessary to diagnose, assess, and treat communication disorders in their prescribed program of study and subsequent clinical training.
- In order to ensure that only qualified personnel, including audiologists and speech-language pathologists are used to assess and treat communication disorders, ASHA recommends that the definition of music therapy be amended to add: "Before providing services for speech, language, voice, fluency, cognitive-linguistic, or swallowing disorder the registered music therapist shall collaborate with the client's audiologist or speech-language pathologist to review the client's diagnosis, treatment needs and treatment plan. When providing educational or rehabilitation services a music therapist may not replace the services typically provided by an audiologist or speech-language pathologist."

Speech-Language Pathologists: Professionals Trained to Assess and Treat Communication Disorders

SLPs are uniquely educated and trained to assess and treat speech, language, swallowing, and cognitive communication disorders in children and adults. These services help children acquire language and enable individuals to recover essential skills to communicate about their health and safety, to swallow adequate nutrition safely, and to have sufficient attention, memory, and organizational skills to function in their environment.

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 **75 semester credit hours in 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 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.
- State licensure (SLPs are regulated in all 50 states and the District of Columbia).
- Completion of 30 hours of professional development activities every three years.

Below is a comparison of core courses and electives for entry-level SLPs and entry-level music therapists that are specific to areas of communication. Speech-language pathologists undergo rigorous training across all aspects of communication as they earn their master’s degree. Although training programs vary among universities, a typical master’s program will include the option to take the courses indicted below. **The core training for music therapy, which requires only a bachelor’s degree to treat communicative and cognitive disorders, is minimal, provides only an overview of communication disorders, and does not address specific treatment standards and methods.**

Core Course Comparisons

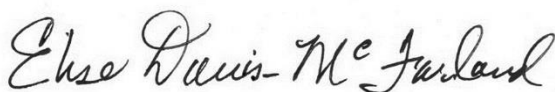
Topic Area	Speech-Language Pathologists	Music Therapists
Language	Option to take courses in 25 different areas, such as: <ul style="list-style-type: none"> • psychology of language • linguistics • language disorders of children • aphasia • developmental neuroscience 	Introduction to speech and hearing process disorders

Topic Area	Speech-Language Pathologists	Music Therapists
	<ul style="list-style-type: none"> • phonological development and disorders • clinical phonology • language acquisition • disorders of speech sounds • communication for individuals with autism 	
Cognitive Assessment	Option to take courses in 18 different areas, such as: <ul style="list-style-type: none"> • developmental language disorders • neurogenic disorders of language • language training • language of school-age children • degenerative disorders • medical speech-language pathology 	Introduction to speech and hearing process disorders
Swallowing	Option to take courses in 20 different areas, such as: <ul style="list-style-type: none"> • craniofacial disorders • dysphagia • head and neck cancer • motor speech disorders • communication disorders in children with medical and developmental needs • neuroscience • speech science 	<ul style="list-style-type: none"> • Introduction to speech and hearing process disorders • Anatomy and physiology

ASHA maintains that SLPs are the only professionals who can appropriately assess and plan treatment for individuals with communication disorders. Therefore, ASHA urges you to address these concerns with the proposed regulations to ensure music therapists are not delivering services that they are not qualified to provide.

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

* American Speech-Language-Hearing Association. (2016). 2014 Standards and Implementation Procedures for the Certificate of Clinical Competence in Speech-Language Pathology. Retrieved from <http://www.asha.org/Certification/2014-Speech-Language-Pathology-Certification-Standards/>.