



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

December 5, 2018

Representative Kristina Roegner
Federalism and Interstate Relations Committee
Ohio House of Representatives
77 S High St
Columbus, OH 43215

RE: SB 255

Dear Chairperson Roegner:

On behalf of the American Speech-Language-Hearing Association, I write to express strong opposition to SB 255 regarding occupational licensure reform. While the intent of this bill is to remedy licensure requirements that create barriers for service providers and restrict access to services, ASHA believes this bill would ultimately lead to health care providers being delicensed. This would have a detrimental and unacceptable impact on the cost and quality of health care provided across the state.

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 6,900 of our members reside in Ohio.

Purpose of Licensure

Licensure is designed to protect consumers from harm by:

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

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 SLPs (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.

Audiology Professional Qualifications and Services

Audiologists earn a clinical doctoral degree and complete over 1,800 hours of clinical training. Audiologists 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, ASHA's Certificate of Clinical Competence (CCC-A), audiologists must complete 30 hours of professional development activities every three years.

Speech-Language Pathology Professional Qualifications and Services

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 an education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. To maintain their certification, ASHA's Certificate of Clinical Competence (CCC-SLP), SLPs must complete 30 continuing education hours every three years.

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/students 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.

Licensure and Medicaid

Audiologists and speech-language pathologists (SLPs) are required to meet minimum standards to obtain their state license. Only licensed professionals are able to bill Medicaid in Ohio. Medicaid funds support a wide range of Medicaid related initiatives, such as funding support for educational services and programs, and health related service needs for Medicaid beneficiaries. Without licensed audiology and speech-language pathology practitioners, Ohio will experience significant Medicaid funding losses.

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Regulatory Oversight Is Needed for Consumer Protection

Regulatory oversight legislated through licensure is the accepted practice for consumer protection. Regulatory boards, including speech-language pathology boards in all 50 states and the District of Columbia, consist of a majority of practitioners from 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 on 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.

Thank you for your consideration of our view regarding SB 255, and the importance of maintaining state licensure for audiologists and speech-language pathologists. 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,

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