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## PENNSYLVANIA SPEECH-LANGUAGE-HEARING ASSOCIATION

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1/12/2017

Judith Pachter Schulder, Counsel  
State Board of Examiners in Speech-Language Pathology and Audiology  
P.O. Box 69523  
Harrisburg, PA 17106-9523

Reference: No. 16A-6803

Dear Attorney Schulder,

The Pennsylvania Speech-Language Hearing Association (PSHA) has reviewed the comments of the Independent Regulatory Review Commission (IRRC) regarding the Act of July 2, 2014 (PL 971, No 106) Act 106. We would like to offer additional thoughts on a few of their comments.

### #2. Section 45.2. Definitions

We recommend that the board reference the American Speech Language Hearing Association (ASHA) definitions and descriptions of the terms "practice of audiology" and "practice of speech language pathology" to assist with clarity. In addition, the IRRC has suggested a regulatory definition be included for "neurophysiologic intraoperative monitoring", therefore have included ASHA's Scope of Practice statement for your reference. The links for your convenience:

Scope of Practice in Speech Language Pathology

<http://www.asha.org/policy/SP2016-00343/>

Scope of Practice in Audiology

<http://www.asha.org/policy/SP2004-00192.htm>

Position Statement of Neurophysiologic Intraoperative Monitoring

<http://www.asha.org/policy/PS1992-00036.htm>

In addition, as an additional observation, in the law, we noted that He and his are used to describe an audiologist doing neurophysiologic interoperative monitoring. We ask if that is the legal "go to pronoun" or not.

### #6. Section 45.22. Foreign Trained applicants

We are in agreement that the PRAXIS examination be required unless the applicant has the ASHA CCC (Certificate of Clinical Competence). If the candidate has their CCC, they have taken the examination.

### #7. Section 45.23. Provisional licenses

We have tried to picture situations when an extension is needed and since new audiology graduates will have completed their clinical practica in their educational externship year, even if they go for their research doctorate, they should be able to apply right away.

**#8. Section 45.103. Unprofessional conduct**

We agree with the comments of the IRRC and suggest that clarified standard be referenced from the Center of Disease Control (CDC) or Center for Medicare & Medicaid Services (CMS).

Thank you for your consideration of our comments. As you are aware, the ability for new speech-language pathology graduates to obtain a provisional license is of great importance to us so that they can obtain jobs in the state of Pennsylvania. We are anxious for completion of the regulatory review process so implement the new licensure law.

A handwritten signature in black ink that reads "Anne Gilbertson". The signature is written in a cursive, flowing style.

Anne Gilbertson  
President  
Pennsylvania Speech Language Hearing Association