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PENNSYLVANIA SPEECH-LANGUAGE-HEARING ASSOCIATION

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11/14/2016

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) is pleased to learn that the proposed rules have returned back in the hands of the Board of Examiners and are now available for comment! The PSHA executive board has reviewed the proposed rules and is overall pleased with the content. Please find below a few comments for the consideration of the BOE.

Comment 1:

In section 45.2 Definitions, under *Practice of audiology (i)(A)* and *Practice of speech-language pathology (xi)*, there is reference to the ASHA's Scope of Practice in Audiology statement approved in 2003 and Scope of Practice in Speech-Language Pathology approved in 2007. However, ASHA adopted a new Scope of Practice for Speech-Language Pathology in 2016. The final approval came after the proposed PA regulations were voted on by the BOE. We would recommend that the regulations be changed to reference that new statement as it reflects the current generally accepted standard of practice, and practice definition for SLPs across the country.

Comment 2:

In section 45.20, referring to Clinical Fellows who would be able to have a Provisional license, do we need the line that states they are working under a licensed SLP? ASHA now considers the supervisor as a "mentor". ASHA's Code of Ethics under Principle of Ethics I (D) states that "they shall inform those they serve professionally of the name, role, and professional credentials of the persons providing the services." We would request that subsection 45.20(d) be changed to read, "The applicant shall inform individuals under his care that he is completing the supervised professional experience and is being mentored by a licensed therapist".

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 look forward to a swift completion of the regulatory review process so implement the new licensure law.

I look forward to hearing back from you!

Anne Gilbertson
President
Pennsylvania Speech Language Hearing Association