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June 24th, 2023

State Board of Examiners in Speech-Language Pathology and Audiology
P.O. Box 2649,
Harrisburg, PA 17105-2649

Re: Regulation #16A- 6808 (IRRC # 3374)

Dear Board of Examiners,

Pennsylvania Speech-Language Hearing Association (PSHA) would like to note our support for regulation #16A-6808 (IRC #3374) relating to licensure by endorsement. Thank you for the efforts to make the process more regulated and for the attention to details in making the proposed amendments. We appreciate the intent to make the process more inclusive!

We agree with the proposed updates, however we have a suggestion regarding 45.25(b). Find the current language pasted here:

"In proposed § 45.25(b), the Board may require a personal interview or additional information to assist the Board in determining eligibility and competency. When a personal interview is necessary, the applicant may request the interview to be conducted by video teleconference for good cause shown."

Could you please include additional information in 45.25(b) on:

A) When a personal interview will be required

- Will it be required: a) for an individual with an international degree even if the transcripts are in English? or b) only when the transcripts are not in English? or c) any other specific instances that would require a personal interview?
- Will interviews be required for those with certification (e.g., CCC-SLP) but not a state license?
- Will interviews be required for those with certification and a state license from another state?

B) Who will conduct the personal interview

- Will it be conducted by licensed professionals? Also, include information on number of members conducting the interview, for example a board of four members?

C) The nature of the interview

- For example, will interview questions be related to testing proficiency in the discipline (speech language pathology or audiology) rather than related to testing English proficiency when a candidate has already demonstrated proficiency in English via TOEFL or its equivalent test?

Thank you again for your work on this regulation.
Respectfully Submitted.

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President of PSHA