



New Mexico Speech-Language and Hearing Association

P.O. Box 25411 Albuquerque, NM 87125

Ph: 505-899-6674 Fax: 505-856-8313

www.nmssha.net

nmssha505@gmail.com

NMSHAs Response to Opposition to SLPA Licensure

January 2019

Thank you for your feedback and recommendations regarding the draft language for licensing Speech Language Pathology Assistants (SLPAs) in New Mexico. New Mexico Speech and Hearing Association (NMSHA) has taken your comments along with the adopted recommendations from American Speech Language & Hearing Association (ASHA) regarding the Scope of Practice for SLPAs and have made **two** changes to the draft New Mexico Licensure bill.

NMSHA has also included documentation below that corrects some of the misleading statements in your opposition letter (sent to the Speech Pathology, Audiology and Hearing Aid Dispensing Board), comparing NM SLPA draft licensure legislation with the recommendations from ASHA.

- A) The Bill is Premature: This first statement about SLPA Licensure Bill being premature is incorrect as follows:
1. ASHA developed model language which includes the Scope of Practice for SLPAs in 2013 for all states. The current Scope of Practice for SLPAs will NOT be revised in 2019 as it is already in place having been approved by the ASHA Board of Directors (January 2013). What will be developed in 2019 and 2020 is the certification examination for SLPAs. This was verified by Eileen Crowe, Director, State Association Relations ASHA January 2019.
 2. The statement about the ASHA revalidating Scope of Practice for SLP Assistants is misleading and incorrect.
- B) Training Problems: The second section regarding the draft bill language does MEET the requirements from ASHA. **Recent Feedback from ASHA recommended one change to our draft (which your letter of opposition also commented upon) which we have made:**



New Mexico Speech-Language and Hearing Association

P.O. Box 25411 Albuquerque, NM 87125

Ph: 505-899-6674 Fax: 505-856-8313

www.nmssha.net

nmssha505@gmail.com

61-14B-15.1 Requirements for Licensure

NMSHA removed the following statement: “a baccalaureate degree in another field with thirty (30) semester hours of credit in speech-language pathology or communication disorders from an accredited college or university”.

The remaining requirements for SLPA licensure mirror the exact requirements for ASHA.

C) Competence: This statement is premature as at this point in time there are no national standards. ASHA is in the process of developing an examination to certify SLPAs. In November 2018, ASHA adopted a **Blueprint for Certifying SLPAs**. This Blueprint lists the duties and tasks that an SLPA must meet in order to be certified. ASHA is on track to develop a certification exam by the end of 2020 utilizing this “blueprint”.

D) The ASHA 2013 Scope of Practice includes under Licensure requirements the following statement:

“Demonstration of competency in the skills required of an SLPA”

NMSHA would like to point out, we cannot place into Statute a requirement to pass an examination that **does not exist. It is important to note that ASLs (Apprentice SLPs) are currently licensed in NM without taking any examination and having less than 100 hours of clinical experience.**

NMSHA has added the ASHA statement to the Requirements for Licensure in our draft bill (which also addresses your concern about “demonstration of competency”). This statement will allow the NM SLP Licensure Board to develop an examination process or to use the



New Mexico Speech-Language and Hearing Association

P.O. Box 25411 Albuquerque, NM 87125

Ph: 505-899-6674 Fax: 505-856-8313

www.nmssha.net

nmssha505@gmail.com

exam format from ASHA and include it in its' Rules (similar to what exists in the Rules for Licensing Bilingual SLPs).

According to feedback from The New Mexico Legislative Counsel Services, The Licensure Board has the authority to include an examination in its Rules rather than Statute (so as ASHA develops a competency exam, there will be no need to go back into Statute and make that addition).

E) Scope of Practice: NMSHA would like to point out that there are indeed safeguards in place.

1. There is concern that the SLPA draft language does NOT make clear that the assistant should not be the primary provider of direct therapy treatment to the client.

The draft Scope of Practice from both ASHA and NMSHA's draft language states in 61-14B-15.1 B "Follow documented treatment programs and procedures that are planned, selected, and/or designed by the supervising speech-language pathologist"

All Scope of Practice statements either state: "follow" or "assist" the supervising speech-language pathologist – the draft language in the SLPA legislation directly MIRRORS that of the ASHA Scope of Practice language.

2. Feedback from several school districts indicates that school districts are currently using ASLs (Apprentice SLPs) to fill the vacant positions of certified SLPs and requiring them to carry their own caseload. This is a violation of the current SLP Licensure Law regarding how ASLs are to be used by school districts. The Licensure Board is aware of the vagueness in the current Statute regarding how ASLs are used.



New Mexico Speech-Language and Hearing Association

P.O. Box 25411 Albuquerque, NM 87125

Ph: 505-899-6674 Fax: 505-856-8313

www.nmssha.net

nmssha505@gmail.com

The draft language for licensing SLPAs and their “Scope of Practice” exactly mirrors the ASHA recommendations for Scope of Practice. NMSHAs & NM Regulation and Licensure Department suggested licensure draft language specifically provides for safeguards (which the current Statute does not for ASLs).

NMSHA suggests that, maybe reading the ASHA 2013 Scope of Practice and NMSHA & NM RLD draft Licensure Bill Scope of Practice would show the comparison of how we address and “mirror” what ASHA recommends.

- F) Not Comparable to OT and PT Assistants: Perhaps consulting with ASHA about why OT and PT assistants require more then their recommended SLPA supervised clinical fieldwork would help with understanding any differences.

ASHA recommends that an SLPA complete 100 hours of supervised clinical practice under the direct supervision of a State Licensed and ASHA certified SLP. Our draft Licensure bill **exactly mirrors** the ASHA requirement. (Please note, that NM Statute language does not allow the inclusion of one certifying agency over another, so ASHA cannot be named directly, but Rules can require national certification along with state licensure).

ASHA accepts the certification or associates degree of an SLPA who completed an SLPA program at an accredited college or university. Those SLPAs that have completed such a training program have, as part of their training program, completed the required 100 hours of clinical practice (which is currently more than what the NM Universities provide to their undergraduates who complete a BA/BS in Communication disorders or speech pathology).



New Mexico Speech-Language and Hearing Association

P.O. Box 25411 Albuquerque, NM 87125

Ph: 505-899-6674 Fax: 505-856-8313

www.nmssha.net

nmssha505@gmail.com

G) There is nothing in the draft language that prevents an SLPA from continuing their education and enrolling and completing a graduate program in speech pathology, the draft SLPA language (which will include the current ASL student) provides an opportunity for those applicants that do not get into graduate school to continue to work in the field and decide if they want to continue their educational training. NMSHA sees this as a way to encourage those applicants who become SLPAs to continue their education.

H) Caseload/workload – Several NMSHA members are concerned about the caseload/workload issue for SLPs in the schools. Caseload/workload language does not belong in Statute. This issue applies only to school districts/charter schools. State Agencies have the authority to develop Rules that address caseload/workload – “Standards for Excellence” is the Public Education Depts’ Rule that governs school districts/charter schools. Once there is a plan for caseload/workload it should be shared with the Director of Special Education at the Public Education who has stated she is willing to work with NMSHA on this issue,

Major Points NMSHA would like to share

- ✓ The NM draft licensure language **mirrors** the language and recommendations from ASHA.
- ✓ NMSHA has consulted with ASHA every step of this process since 2015 and again NMSHA has reached out to ASHA for a review and consult regarding this and other concerns recently brought forth, January 2019
- ✓ NMSHA will be posting to their website the following documents so that SLPs in NM can compare the ASHA 2013 Scope of Practice with that of the NM draft SLPA licensure legislation:
 - ✓ ASHA Adopted Scope of Practice for SLPAs
 - ✓ ASHA SLPA Exam Blueprint (11-1-2018)



New Mexico Speech-Language and Hearing Association

P.O. Box 25411 Albuquerque, NM 87125

Ph: 505-899-6674 Fax: 505-856-8313

www.nmsha.net

nmsha505@gmail.com

- ✓ NM Draft SLPA Licensure (January 2019) – this will be replaced by the draft Bill when it is introduced during the 2019 Legislative session. The draft SLPA language as posted from January 2019 is currently with Legislative Counsel Services. As soon as the bill is drafted and numbered it will be posted to the NMSHA website and list serve.