



Speech-Language-Hearing Association of Virginia

July 12, 2012

Leslie Knachel, MPH
Executive Director
Board of Audiology and Speech-Language Pathology
9960 Mayland Drive, Suite 300
Henrico, VA 23233-4632

Dear Ms. Knachel and the Board of Audiology Speech-Language Pathology:

Re: Re: Sec. 54.1-2602 & 54.1-2604 Code of Virginia
Provisional licensure proposal for Clinical Fellowship Speech Pathologists:

The Speech-Language-Hearing Association of Virginia (SHAV) is in agreement with the proposed changes of Chapter 26, § 54.1-2604. This provisional license will align Virginia with the licensure requirements of many other states. There are 47 states that require a provisional license during the clinical fellowship (CF) period. However, since Virginia currently awards CF Speech-Language Pathologists (SLPs) with a license to practice, the VA license is not recognized by other states since the American Speech-Language -Hearing Association (ASHA) certification has not been completed. Also, the CF/provisional license period will alleviate confusion with regard to licensure for new SLPs moving to Virginia from other states.

Graduates in Audiology and Speech-Language Pathology would have completed all necessary educational requirements in post-graduate education. After graduating, Audiologists and SLPs may then be hired in various settings to complete a CF period to gain experience with supervision from a licensed and certified Audiologist or SLP. ASHA acknowledges the completion of these requirements with awarding the Certificate of Clinical Competence.

The provisional license will treat Audiologists and SLPs equally during their Clinical Fellowship period as currently the regulation only regulate that CF Audiologists apply for a provisional license.

Thank you for the benefit of allowing Speech-Language-Hearing Association of Virginia to comment.

Sincerely,



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

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Leslie Knachel, MPH
Executive Director
Board of Audiology and Speech-Language Pathology
9960 Mayland Drive, Suite 300
Henrico, VA 23233-4632

Re: Sec. 54.1-2602 & 54.1-2604 Code of Virginia

Dear Ms. Knachel:

The American Speech-Language Hearing Association (ASHA) is pleased to have the opportunity to respond to the request for comments on Section 54.1-2604 of the Virginia Code pertaining to the addition of a provisional license for speech-language pathology clinical fellows. We offer no comments on the revisions to Section 54.1-2602 regarding Board membership.

Clinical Fellowship

Prior to becoming an independent practitioner, ASHA's clinical fellowship (CF) is necessary for new graduates to obtain work experience under the supervision and mentorship of a licensed and certified speech-language pathologist (SLP). The purpose of the clinical fellowship includes:

- Integration and application of the theoretical knowledge from academic training
- Evaluation of strengths and identification of limitations
- Development and refinement of clinical skills consistent with their scope of practice
- Advancement from constant supervision to independent practitioner

In order to qualify for ASHA's Certificate of Clinical Competency (CCC), the CF requirements are as follows:

- 36 weeks of full-time (35 hours per week) experience (or the equivalent part-time experience), totaling a minimum of 1,260 hours. Part-time work can be completed, as long as the CF works more than 5 hours per week. Working more than 35 hours per week will not shorten the minimum requirement of 36 weeks.
- Mentoring by an individual holding ASHA certification in speech-language pathology. It is the responsibility of the clinical fellow to verify certification of the mentoring SLP, and can do so by contacting the ASHA Action Center at 800-498-2071.

- A score of "3" or better on the core skills in the final segment of the experience, as rated by SLPCF Mentor using the SLP Clinical Fellowship Skills Inventory form.
- 80% of time must be spent in direct clinical contact (assessment/diagnosis/evaluation, screening, treatment, report writing, family/client consultation, and/or counseling) related to the management of disordered that fit within the ASHA model Speech and Language Pathology Scope of Practice.
- Submission of an approvable CF Report and Rating form.

ASHA has deemed the CF as an essential part of the certification process and the majority of states have adopted the CF requirement as a qualification for initial licensure.

One of Three States Lacking a Clinical Fellowship Requirement

Virginia is one of only three states in the U.S. that does not require a CF in order to receive a state license. Individuals who receive an initial license in Virginia without documentation of CF training can face licensure portability issues when applying for reciprocity in states with qualifications that require equivalency. In addition, lack of a documented fellowship would prevent that individual from qualifying for the ASHA CCCs, which is a nationally recognized professional credential that represents excellence in the field of speech-language pathology.

Provisional License

A provisional license offered by the Board in recognition of the clinical fellowship will not only place speech-language pathologists on par with audiologists in the Commonwealth of Virginia, but also allows these individuals to qualify under federal Medicaid regulations (42 CFR, Ch. IV, Sec. 440.120(iii)), to provide services to individuals with communications disorders. This is an important consideration in light of growing demand and health care provider shortages. Further, establishing a provisional license for a clinical fellowship could permit some Medicaid eligible providers to be reimbursed for services provided by the clinical fellow.

In summary, ASHA whole-heartedly supports the establishment of a speech-language pathology clinical fellowship under a provisional license as proposed in the draft legislation. It is an important step forward in ensuring that the residents of Virginia receive the highest level of services from the most qualified speech-language pathologists.

Thank you for the opportunity to express our views. We are happy to assist you in this process in any way that we can. If you have any questions regarding the information we have provided, please contact Janice Brannon, ASHA's director of state special initiatives, at jbrannon@asha.org or by phone at 301-296-5666.

Sincerely,



Shelly S. Chabon, PhD, CCC-SLP
2012 ASHA President

**Board of Audiology and Speech-Language Pathology
2013 Session of the General Assembly**

Draft Legislation

A bill to amend and reenact §§ 54.1-2602 and 54.1-2604 of the Code of Virginia, relating to officers of the Board of Audiology and Speech-Language Pathology and provisional licensure.

Be it enacted by the General Assembly of Virginia:

- 1. That §§ 54.1-2602 and 54.1-2604 of the Code of Virginia are amended and reenacted as follows:**

§ 54.1-2602. Board membership; officers; ~~duties of Director of Department.~~

The Board of Audiology and Speech-Language Pathology shall consist of seven members as follows: two licensed audiologists, two licensed speech-language pathologists, one otolaryngologist, and two citizen members. The terms of Board members shall be four years. All professional members of the Board shall have actively practiced their professions for at least two years prior to their appointments.

The Board shall elect annually a chairman and a vice-chairman. ~~The Director of the Department of Health Professions shall act as secretary-treasurer of the Board and shall keep a complete record of the proceedings and accounts of the Board.~~

The Board shall be authorized to promulgate canons of ethics under which the professional activities of persons regulated shall be conducted.

§ 54.1-2604. Provisional license in audiology or speech-language pathology.

The Board may issue a provisional license to an applicant for licensure in audiology or speech-language pathology who has met the educational and examination requirements for licensure, to allow for the applicant to obtain clinical experience as specified in the Board's regulations. However, a person practicing with a provisional license shall practice only under the supervision of a licensed audiologist or a speech-language pathologist in accordance with regulations established by the Board.

- 2. That the Board of Audiology and Speech-Language Pathology shall promulgate regulations to implement provisions of this act within 280 days of its enactment.**