

April 21, 2026
Board Room 3
9:00 a.m.

Agenda

**Virginia Board of Audiology &
Speech-Language Pathology
Full Board Meeting**

Call to Order – Lisa G. Wallace-Davis, OD, Chair

Page 1

- Welcome and Introductions
- Emergency Egress
- Mission Statement

Ordering of Agenda – Dr. Wallace-Davis

Public Comment – Dr. Wallace-Davis

The Board will receive all public comments related to agenda items at this time. The Board will not receive comments on any regulatory process for which a public comment period has closed or any pending or closed complaint or disciplinary matter.

Approval of Minutes – Dr. Wallace-Davis

Pages 2-6

- December 9, 2025 Board meeting (pp 2-6)

Agency Director’s Report – Dr. David E. Brown, DC

Legislative/Regulatory Report – Ms. Erin Barret & Mr. Matt Novak

Pages 7-24

- Current Regulatory Actions (p 7)
- Consideration of Petition for Rulemaking (pp 8 - 24)

Board Counsel’s Report – Mr. Brent Saunders

Chair’s Report – Dr. Wallace-Davis

Staff Reports

Page 25

Executive Director’s Report – Ms. Moss

- Update on ASLP-IC Licensure Compact – Ms. Moss
- Outreach

Licensing report and statistics – Ms. Laura Jackson

Discipline report and statistics – Ms. Claire Foley

New Business – Dr. Wallace-Davis

Next Business Meeting – Dr. Wallace-Davis/Ms. Moss

Page 26

- July 7, 2026
-
-



Virginia Department of

Health Professions

Board of Audiology and Speech-Language Pathology

Perimeter Center
9960 Mayland Drive, Suite 300
Henrico, VA 23233-1463

Email: auidb@dhp.virginia.gov

Phone: (804) 597-4132

Fax: (804) 939-5238

Website: <http://www.dhp.virginia.gov/Boards/ASLP/>

-
- **2026 Calendar (p 26)**
-

Meeting Adjournment – Dr. Wallace-Davis

This information is in **DRAFT** form and is subject to change.

MISSION STATEMENT

Our mission is to ensure safe and competent patient care by licensing health professionals, enforcing standards of practice, and providing information to health care practitioners and the public.

Call to Order

The Virginia Board of Audiology & Speech-Language Pathology's December 9, 2025, meeting was called to order at 11:30 a.m. at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, 2nd Floor, Board Room 3, Henrico, Virginia 23233.

Presiding Officer

Melissa A. McNichol, AuD, CCA-A

Members Present

Lisa G. Wallace-Davis, OD
Wayne Shaia, MD
Jennifer Radford Gay, MS, CCC-SLP
James Wells, RPh
Laura H. Vencill, MS, CCC-SLP
Bethany Rose, AuD

Staff Present

Arne W. Owens, Director, DHP
Kelli G. Moss, Executive Director
Claire C. Foley, Deputy Executive Director
Matt Novak, Agency Regulatory Coordinator
M. Brent Saunders, Senior Assistant Attorney General, Board Counsel
Yetty Shobo, PhD, Director of Healthcare Workforce Data Center (HWDC), DHP
Laura L. Jackson, Board Administrator
Laura D. Paasch, Senior Licensing & Operations Specialist

Public Present

Melanie-Joy H. Dorn, MA, CCC-SLP, Vice President of Government & Professional Affairs, Speech-Language Hearing Association of Virginia

Establishment of Quorum

Seven out of seven board members were present in the Richmond office, constituting a quorum for conducting business.

Introduction

Dr. McNichol welcomed Mr. M. Brent Saunders, Senior Assistant Attorney General, as counsel for this board. She noted that Mr. Saunders, along with another assistant attorney general, provided valuable support to the board following previous board counsel's transition to a new role in September 2024. Dr. McNichol expressed the Board's appreciation for the Office of the Attorney Generals' continued assistance during this transition and that she was pleased to officially welcome Mr. Saunders as board counsel.

Ordering of Agenda

Dr. McNichol opened the floor to any edits or corrections to the agenda. Ms. Moss informed the board that due to a scheduling conflict she suggested the Board reorder the agenda to allow Mr. Owens to provide the agency director's report after the Board completed its discussion items.

A **MOTION** was made by Mr. Wells to reorder the agenda as requested. The motion was seconded by Dr. Wallace-Davis and carried unanimously.

Public Comment

Ms. Moss reported there were no requests to provide public comment.

Approval of Minutes

Dr. McNichol opened the floor to any edits or corrections to the draft minutes of the full board meeting and formal hearing held on July 8, 2025. With no additions or corrections, the minutes were approved as presented.

Legislative/Regulatory Report

Mr. Novak provided a report on regulatory activity and the status of current regulatory actions.

Consideration of Petition for Rulemaking to Eliminate 18 VAC 30-21-60(A)(2)(c).

After reviewing the Petition for Rulemaking and related public comments, the Board discussed aspects of the postgraduate clinical experience requirement, including whether it is necessary for new graduates to obtain on-the-job training under supervision for licensure and the supervision process. Board members agreed that additional clinical experience is very important and is necessary. They also noted that the ASLP Compact and all other U.S. licensing boards except one require applicants to have completed postgraduate clinical hours under supervision.

A **MOTION** was made by Dr. Shaia to take no action with respect to this petition as the Board believes the requirement under 18 VAC 30-21-60(A)(2)(c) is necessary and appropriate for licensure. The motion was seconded by Ms. Vencill and carried unanimously.

Consideration of Proposed Stage Language to Implement the ASLP Compact

The Board held a brief discussion regarding the changes to the proposed regulations for entry into the ASLP Compact presented by Mr. Novak.

A **MOTION** was made by Dr. Wallace-Davis to adopt proposed regulations to implement the ASLP Compact. The motion was seconded by Mr. Wells and carried unanimously.

Discussion Items

2025 Healthcare Workforce Data Center Reports

Dr. Yetty Shobo presented the 2025 Healthcare Workforce Data Center reports for Audiology and Speech-Language Pathology.

Revised Sanctions Reference Point (SRP) Manual

Ms. Moss and Ms. Foley provided the updated SRP manual for the Board's consideration that was developed based on the changes to the worksheet and instructions that the Board adopted at its July business meeting. Ms. Moss informed the Board that the current SRP manual has been classified as a policy document, which is available to the public on the Board's website.

A **MOTION** was made by Mr. Wells to adopt the revised SRP manual as a policy document. The motion was seconded by Dr. Wallace-Davis and carried unanimously.

Agency Director's Report

Mr. Owens thanked all Board members and staff for their work on the Board. He stated the new Governor will take office on January 17, 2026, and that a team has been created at DHP to facilitate a smooth transition to the new administration. He announced that a new DHP director will be appointed by the Governor and that DHP will continue to follow its mission under the new director, focusing on operational and budgetary efficiency measures and participating in the development of the 2027-2028 biennial budget. He anticipated the January 14, 2026 General Assembly session will include proposed legislation relating to the agency's health regulatory boards.

Board Counsel's Report

Mr. Saunders stated there are three attorneys in the attorney general's office that work with DHP boards, and now that all three positions are filled, he is pleased to be working with this Board on a permanent basis.

Chair's Report

Dr. McNichol had no information to report to the Board.

Staff Reports

Executive Director's Report

Ms. Moss provided an update on the ASLP-International Compact (IC), noting that Ms. Gay and Dr. Rose are Virginia's delegates. She stated that 37 states are now part of the ASLP-IC and that Compact Connect is operational as of October 28, 2025, accepting applications from Louisiana and West Virginia. Board staff are developing the processes and applications for Virginia to participate in the ASLP-IC once the final regulations are in effect. She stated board staff will continue to post ASLP-IC updates and information on its website as it becomes available.

Ms. Moss presented DHP's conflict-of-interest policy that requires all board members under DHP to submit a signed acknowledgement of this policy.

Ms. Moss provided information on educational outreach, reporting she has been contacted by Old Dominion University and University of Virginia to provide board information to graduate students. She stated she was recently contacted by the Speech-Language Hearing Association of Virginia (SHAV) to

Draft Meeting Minutes
December 9, 2025, Board Meeting

present at its 2026 annual meeting. Ms. Moss expressed appreciation for the opportunities provided to board staff to connect with licensees, applicants and the public.

Ms. Moss is working with Kelly Smith, DHP’s Director of Communications, on a board newsletter to increase public awareness and engagement.

Ms. Moss announced Ms. Tamara Farmer has left the board as the senior licensing specialist after serving eight years in this position, and Ms. Laura Paasch immediately volunteered to take on additional duties providing critical support to applicants. She stated Ms. Paasch has done an outstanding job and has now assumed all licensing duties for the ASLP board on a permanent basis. This change in board staff duties increases the efficiency and effectiveness of licensing processes for this board.

Ms. Moss reported that Ms. Laura Jackson will be more extensively involved in regulatory and policy matters going forward as she has completed the licensing staff transition and training processes for all boards under her supervision. This includes providing licensing reports to the Board starting with this meeting, updating applications and developing newsletters.

Licensing report and statistics

Ms. Jackson provided an update on the Board’s licensing statistics as follows.

Profession	Licenses Issued	Average Processing Days
Audiologist	31	36
Provisional License	2	2
Reinstatement	6	11
School Speech-Language Pathologist	21	23
Speech-Language Pathologist	158	15
Provisional to Full	63	24
Reinstatement	27	21
Total	303	

Discipline report and statistics

Ms. Foley provided an update on the open and closed discipline cases as follows.

Discipline	Open Cases	Closed Cases
July 9, 2025 - December 8, 2025	31	10

New Business

No new business was reported.

Next Meeting

Dr. McNichol announced the next full board meeting is scheduled for Tuesday, April 21, 2026. Ms. Moss reviewed the 2026 calendar and announced that board members will receive calendar invitations to board meetings and for disciplinary hearings. By accepting these invitations, Board members will notify staff in advance who will attend for staff to ensure a quorum is attained.

Adjournment

With no objection, Dr. McNichol adjourned the meeting at 12:45 p.m.

Kelli G. Moss
Executive Director

DRAFT

Board of Audiology and Speech-Language Pathology
Current Regulatory Actions
As of April 2, 2026

In the Governor's Office

VAC	Stage	Subject Matter	Submitted from agency	Time in current location	Notes
18VAC30-21	Final	Regulatory clean-up of section 131	7/10/2025	31 days	Corrects references that were not changed in a previous action.

In the Secretary's Office

VAC	Stage	Subject Matter	Submitted from agency	Time in current location	Notes
18VAC30-21	Proposed	Implementation of the ASLP Compact	12/12/2025	1 day	Enters Virginia into the ASLP Compact.

In the Department of Planning and Budget

None.

In the Office of the Attorney General

None.

Recently effective or awaiting publication

None.

Action Item: Consideration of Petition for Rulemaking

Included in your Agenda Package:

- Petition for Rulemaking from the American Academy of Audiology; and
- Public comments received on TownHall

Staff Note: There were 13 comments on the petition, with 11 in support and 2 in opposition.

Action Needed:

- Motion to either:
 - Accept the petition and initiate rulemaking; OR
 - Take no action on the petition, clearly stating why.



COMMONWEALTH OF VIRGINIA

Board of Audiology & Speech-Language Pathology

9960 Mayland Drive, Suite 300
Richmond, Virginia 23233-1463

(804) 367-4630 (Tel)
(804) 527-4471 (Fax)

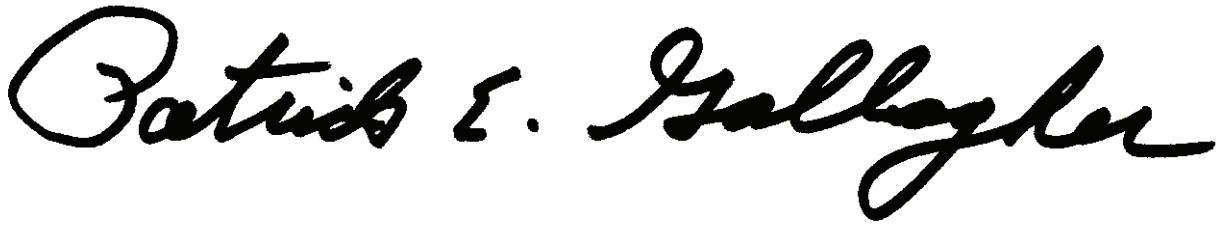
Note: As of June 1, 2019, the Boards phone number will change to: (804) 597-4132

Petition for Rule-making

The Code of Virginia (§ 2.2-4007) and the Public Participation Guidelines of this board require a person who wishes to petition the board to develop a new regulation or amend an existing regulation to provide certain information. Within 14 days of receiving a valid petition, the board will notify the petitioner and send a notice to the Register of Regulations identifying the petitioner, the nature of the request and the plan for responding to the petition. Following publication of the petition in the Register, a 21-day comment period will begin to allow written comment on the petition. Within 90 days after the comment period, the board will issue a written decision on the petition. If the board has not met within that 90-day period, the decision will be issued no later than 14 days after it next meets.

Please provide the information requested below. (Print or Type)		
Petitioner's full name (Last, First, Middle initial, Suffix) Patrick Gallagher, American Academy of Audiology		
Street Address 11480 Commerce Park Drive, Suite 220	Area Code and Telephone Number 800-222-2336	
City Reston	State VA	Zip Code 20190
Email Address (optional) mmoore@audiology.org	Fax (optional)	
Respond to the following questions:		
1. What regulation are you petitioning the board to amend? Please state the title of the regulation and the section/sections you want the board to consider amending. 18 VAC30-21-60. Qualifications for initial licensure. Section A.		
2. Please summarize the substance of the change you are requesting and state the rationale or purpose for the new or amended rule. The Academy requests that the Board reinstate American Board of Audiology (ABA) certification as an accepted pathway for audiologists applying for licensure in Virginia. Specifically, the requested change would restore ABA certification as an alternative credential demonstrating that an applicant has met nationally recognized education and competency standards equivalent to those required for other approved pathways. The removal of ABA certification unintentionally eliminated a recognized licensure pathway for audiologists. Under the current regulation, applicants must either hold ASHA CCCs or provide qualifying education and official Praxis examination scores. However, Praxis scores are not retained indefinitely, leaving many experienced audiologists without access to their historical test records. ABA certification provides a valid, nationally accepted credential that verifies an audiologist's education, training, and professional competency. Reinstating ABA as a licensure pathway would prevent unnecessary barriers for qualified audiologists and ensure that the regulation reflects the full range of recognized professional standards within the field.		
P009		

3. State the legal authority of the board to take the action requested. In general, the legal authority for the adoption of regulations by the board is found in § 54.1-2400 of the Code of Virginia. If there is other legal authority for promulgation of a regulation, please provide that Code reference.

A large, handwritten signature in black ink that reads "Patricia E. Gallagher". The signature is written in a cursive style with a large initial 'P'.

Signature:

Date:12/16/25

March 2019



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Agency Department of Health Professions

Board Board of Audiology and Speech-Language Pathology

Chapter Regulations Governing Audiology and Speech-Language Pathology [[18 VAC 30 - 21](#)]

13 comments

All good comments for this forum [Show Only Flagged](#)

[Back to List of Comments](#)

Commenter: Larry Engelmann, M.S., Au.D.

1/16/26 12:52 pm

Amendment of 18VAC30-21-60(A) to include American Board of Audiology certification as an accepted pa

The Au.D. degree is a general practice degree that enables audiologists to have a broad scope of practice (SOP). It is this general broad SOP that is specified in licensing laws. Specialty practice and certification should have absolutely nothing to do with entry-level licensure. Certification should only be accomplished and acquired after post-licensure training and advanced education. Licensing boards and licensing laws should never use a narrow specialty certification as a measure to shortcut a determination of whether or not an applicant is eligible to receive an entry-level license for a broad scope of practice. That determination should be made by an applicant satisfying the state's degree requirements and acceptable national examination scores established by the board. State licensing regulates entry-level qualifications -- not specialty qualifications. States are sovereign -- they should not be encumbered by any professional organization in any legislative language, e.g., ASHA or AAA, nor by certification language, e.g., CCC-A or ABA certification designations.

CommentID: 238926

Commenter: Jennifer Poston, PhD, Association of Virginia Audiologists

2/2/26 9:30 am

Association of Virginia Audiologists response

On behalf of the Association of Virginia Audiologists (AVA), we respectfully urge the Board to reinstate language recently omitted to include: (i) unrestricted American Board of Audiology (ABA) certification with a passing score on a qualifying national examination, and (ii) recognition of the Accreditation Commission for Audiology Education (ACAIE) as an approved accrediting body for audiology education programs. Recognition of ABA certification as a path toward licensure and recognition of the ACAIE accrediting body were included in prior versions, but were recently omitted from section 18VAC30-21-60, Qualifications for Initial Licensure.

The American Board of Audiology (ABA) is a nationally recognized certifying body for professional audiologists. Individuals who obtain ABA certification demonstrate a commitment to ethical practice, rigorous professional standards, and ongoing professional development. ABA certification is voluntary; however, for many years it has been recognized as a valid and appropriate qualification for state licensure purposes, alongside other national credentials.

The Accreditation Commission for Audiology Education (ACAIE) has developed and adopted

educational standards, policies, and procedures consistent with guidelines established by the Council for Higher Education Accreditation (CHEA) and the United States Department of Education. ACAE is the only accrediting body focused exclusively on audiology doctoral programs, and each accredited program must meet 40 rigorous accreditation standards.

While these entities were omitted from the current regulations, the Certificate of Clinical Competence in Audiology (CCC-A) and Council on Academic Accreditation (CAA) accreditation remain recognized. Limiting licensure pathways to a single certification and a single accrediting body is inequitable and fails to recognize that audiologists are offered multiple nationally accepted paths to voluntary certification and professional education.

The Association of Virginia Audiologists recognizes both the CCC-A and the ABA as voluntary credentials and considers both the CAA and ACAE to be high-quality accrediting organizations. Members of our organization may hold certification from one or both certifying bodies. Restricting state licensure recognition to a single certification pathway creates an undue and unnecessary hardship for otherwise qualified audiologists who elected to pursue ABA certification and who meet all professional standards for practice.

For these reasons, AVA respectfully requests that the Board reinstate recognition of ABA certification and ACAE accreditation as qualifying pathways for initial licensure, consistent with prior regulations and principles of fairness, professional parity, and public protection.

Respectfully submitted,

Association of Virginia Audiologists, Board of Directors
Kristin Koch, Au.D., President
Nathan Michalak, Au.D., President-Elect
Melissa Garber, Au.D., Member at Large
Jennifer Poston, Ph.D., Vice President of Advocacy
Allison Croushorn, Au.D., Vice President of Membership
Casey Vandervelde, Au.D., Vice President of Communications
Jamilah Odeh, Au.D., Vice President of Continuing Education
Kim Imajo, Au.D., Treasurer
Crystal Amantea, Au.D., Secretary
CommentID: **239338**

Commenter: Allison Croushorn

2/4/26 8:18 am

Croushorn Comment 2026

VA 18VAC30-21-60 Comment Letter

Dear Members of the Board,

My name is Allison Croushorn and I am a practicing audiologist at Fauquier ENT Consultants in Warrenton, Virginia. I am writing to express my support for the proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists. Restoring this pathway will help ensure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards.

Recognizing multiple pathways is important for supporting workforce mobility and ensuring patient access to hearing and balance care across the Commonwealth. As someone who is new to the profession, I can see how this will directly negatively impact audiologists who are new to and currently working in the profession. This certification allows for an additional licensure pathway and

recognition of Au.Ds who go above the required education needs and take pride in their career. I believe this change will benefit both professionals and patients.

Thank you for your work to modernize and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

Sincerely,

Allison Croushorn

Fauquier ENT Consultants

Warrenton, VA

Acroushorn1@gmail.com

CommentID: **239441**

Commenter: Lorraine (Lori) Gardner, AuD

2/4/26 11:36 am

VA 18VAC30-21-60

Dear Members of the Board,

I am Lorraine (Lori) Klein Gardner, a practicing audiologist and former owner of Hear Virginia, located in Richmond Virginia. I have been a Virginia audiologist licensee for forty-eight years. I write to express my support for the proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure in the Commonwealth of Virginia.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was mistakenly removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists. Restoring this pathway will insure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards.

Recognizing MULTIPLE pathways is important for supporting workforce mobility and ensuring patient access to hearing and balance care across the Commonwealth. As someone who struggled to secure licensed audiologists at my (former) private practice, Hear Virginia, I personally experienced and seen delays in licensure limit career paths of young audiologists AND more importantly, impact (delay) needed patient care. I believe this change will benefit both professionals and patients.

Thank you for your work to modernize and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and to encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

CommentID: **239447**

Commenter: Laurel Braverman, AuD

2/4/26 2:00 pm

VA 18VAC30-21-60 Comment in support of ABA

Dear Members of the Board,

P013

My name is Laurel Braverman and I am a practicing audiologist in Manassas, Virginia. I am writing to express my support for the proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists. Restoring this pathway will help ensure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards.

Recognizing multiple pathways is important for supporting workforce mobility and ensuring patient access to hearing and balance care across the Commonwealth. As someone who currently maintains ABA certification and who works with underserved populations in Northern Virginia, I believe this change will benefit both professionals and patients.

Thank you for your work to modernize and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

Sincerely,

Laurel Braverman, AuD
Thomas H. Rhee, MD, PC / Manassas Hearing Center
Manassas, VA
laurelbraverman@gmail.com

CommentID: **239450**

Commenter: Amelia Shuster

2/5/26 10:14 am

Support for the proposed amendment to 18VAC30-21-60(A)

Dear Members of the Board,

My name is Amelia Shuster, and I am a clinical audiologist in Fairfax, Virginia. I am writing to express my support for the proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists. Restoring this pathway will help ensure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards.

Recognizing multiple pathways is important for supporting workforce mobility and ensuring patient access to hearing and balance care across the Commonwealth. Being located in Northern Virginia, our practice frequently hires audiologists who are moving to the area from out of state, or who have recently graduated from a doctoral program. Having multiple pathways to obtain a Virginia audiology license helps audiologists make the transition to working in Virginia more quickly. Removing the ABA certification as a pathway for licensure will lead to delays in audiologists being able to see patients, which means decreased productivity for the clinic and longer wait times for patients to receive care. As someone who has weathered multiple staff turnovers, I believe that recognizing ABA certification will benefit both professionals and patients.

Thank you for your work to modernize and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

P014

Sincerely,
Amelia Shuster, AuD
Otolaryngology Associates
Fairfax, VA
CommentID: 239455

Commenter: Erin Piker, James Madison University

2/5/26 1:18 pm

18VAC30-21-60(A)

Dear Members of the Board,

My name is Erin Piker and I am an audiology faculty member at James Madison University in Harrisonburg, Virginia. I am writing to express my support for the proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists. Restoring this pathway will help ensure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards.

JMU is the only accredited AuD program in the Commonwealth and many of our students choose to stay in Virginia. I feel it is important to not place licensure barriers on those wanting to practice in the Commonwealth. I believe this change will benefit both professionals and patients.

Thank you for your work to modernize and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

Sincerely,

Erin G. Piker, AuD, PhD
Associate Professor
Program Director of Audiology
Director, Vestibular Sciences Lab
James Madison University
Department of Communication Sciences and Disorders
235 MLK Jr. Way, MSC 4304
Harrisonburg, VA 22802
540-568-3871
CommentID: 239456

Commenter: Michelle Moore

2/6/26 11:01 am

American Academy of Audiology Comments

February 6th, 2026

VA Professional and Occupational Licensing Board of Audiology and Speech-Language Pathology
9960 Mayland Drive
Suite 300
Henrico, VA 23233

Re: Amendment of 18VAC30-21-60(A) to include American Board of Audiology certification as an accepted pathway for audiologists applying for licensure

P015

Dear Members of the Board,

The American Academy of Audiology (the Academy) appreciates the opportunity to submit comments in support of amending 18VAC30-21-60(A) to include American Board of Audiology (ABA) certification as an accepted pathway for audiologists applying for licensure. The Academy is the largest professional organization of, by, and for audiologists and is dedicated to advancing quality hearing and balance care through professional development, education, research, and increased public awareness.

The amendment seeks the restoration of ABA certification in the licensure regulations as an alternative pathway to audiology licensure while maintaining rigorous professional standards. When ABA certification was removed from the regulations, the result was not increased flexibility, but rather the elimination of a recognized pathway, leaving applicants with effectively a single certification-based option for licensure. This narrowing of pathways makes it more difficult for qualified audiologists to become licensed in Virginia.

ABA certification is a nationally recognized credential that reflects comprehensive education, examination, and professional requirements specific to the practice of audiology. The ABA certification process is designed exclusively for audiologists and requires demonstration of advanced competencies, making it a highly rigorous and profession-specific credential. In many respects, ABA certification represents a more specialized and stringent standard for the practice of audiology than broader certification pathways that are not exclusively focused on audiology.

Virginia's regulations already recognize certification as an expedited pathway to licensure, and if the Commonwealth recognizes the CCC, it should likewise recognize ABA certification. Explicitly restoring ABA certification alongside other accepted pathways would preserve applicant choice and accurately reflect the diverse, high-quality training routes within the audiology profession. Explicitly restoring ABA certification alongside other accepted pathways would preserve applicant choice, ensure recognition of a highly rigorous audiology-specific credential, and accurately reflect the diverse, high-quality training routes within the audiology profession.

Thank you for your consideration of this amendment and for your continued work to modernize and clarify audiology licensure in Virginia. The Academy appreciates the opportunity to provide input on this petition and looks forward to continued collaboration with the Board. If you have any questions regarding these comments, please contact Joanne Zurcher, Vice President of Government Relations, at jzurcher@audiology.org.

Sincerely,



David Zapala, PhD

President, American Academy of Audiology

CommentID: **239460**

Commenter: cheryl A. Wray

2/8/26 7:24 am

ABA licensure

Dear Members of the Board,

My name is **Cheryl Wray**, and I am a practicing audiologist with an ENT group and owner of a clinic in Courtland which is in southeastern, Virginia. I am writing to express my support for the

P016

proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists. Restoring this pathway will help ensure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards.

Recognizing multiple pathways is important for supporting workforce mobility and ensuring patient access to hearing and balance care across the Commonwealth. As someone who works with underserved populations drawing in from rural areas, delays in licensure will certainly impact patient care. In this region there is a high shortage of audiologists. Putting further restrictions on their ability to begin work without further impedence is of a high importance. I believe this change will benefit both professionals and patients. The physicians I work for are struggling to find audiology help and unfortunately have had to rely on technicians. This does not help when higher levels of education are needed such as cochlear implants and bone implants. We are desperate and stretched thin as I travel from office to office for these duties.

Thank you for your work to amend and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

Sincerely,

Cheryl Wray, Clinical Audiologist

TPMG ENT – Suffolk, Newport News and Williamsburg, VA

CommentID: 239516

Commenter: Melissa Garber

2/9/26 11:12 am

Licensure standards should be consistent and not create barriers

I am encouraging the board to reinstate ABA as an acceptable certification for licensure of audiologists in the Commonwealth of Virginia. As the Clinical Education Coordinator at JMU, I work with many individuals seeking initial licensure in the Commonwealth. I also receive requests from many potential employers seeking to hire audiologists. Omitting a well respected credential will make it harder for some audiologists to obtain licensure in Virginia. This is problematic because there is a significant shortage of audiologists in the state already. Both the ABA and CCC-A should be considered acceptable credentials when applying for licensure in the Commonwealth of Virginia.

CommentID: 239538

Commenter: Jennifer Poston

2/9/26 1:38 pm

ABA support

Dear Members of the Board,

P017

My name is Jennifer Poston and I am a practicing audiologist in Fairfax, Virginia. I am writing to express my support for the proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists. Restoring this pathway will help ensure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards.

Recognizing multiple pathways is important for supporting workforce mobility and ensuring patient access to hearing and balance care across the Commonwealth. As someone who recently applied for a re-instatement of their license (originally licensed in 2005-2012 before moving and working in the Philadelphia metro area), obtaining my Virginia license a second time was no less difficult than my initial licensure. There were several calls back and forth about if I had this or that affiliation (which thankfully I did) but the process was not easy even 20 years of being a licensed provider. Moving back 'home' as a military spouse on orders and knowing this state has lots of other transient families, having these valid pathways that prove our competence and abilities should make obtaining this license easier, not harder. It will make expanding the workforce I believe this change will benefit both professionals and patients.

Thank you for your work to modernize and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

Sincerely,
Jennifer Poston, PhD, CCC-A, F-AAA
Clinical Audiologist - Otolaryngology Associates
Fairfax, Virginia
jposton@entmds.net
CommentID: 239558

Commenter: Anne Dare, Macon and Joan Brock Virginia Health Science Center at ODU 2/10/26 9:59 pm

In support of ABA as an avenue to licensure

Dear Members of the Board,

My name is Anne Dare and I am a board-certified pediatric audiologist in Norfolk, Virginia. I am writing to express my support for the proposed amendment to 18VAC30-21-60(A) to restore American Board of Audiology (ABA) certification as an accepted pathway for audiology licensure.

ABA certification is a nationally recognized credential that reflects education, examination, and professional requirements specific to audiology. When ABA certification was removed from the regulations, it reduced flexibility and limited licensure options for qualified audiologists, including myself. Restoring this pathway will help ensure that Virginia can attract and retain highly trained audiologists while maintaining strong professional standards. I worked hard for my education and advanced credentials and would like to keep my skills in Virginia.

Recognizing multiple pathways is important for supporting workforce mobility and ensuring patient access to hearing and balance care across the Commonwealth. As someone who is board certified in pediatric audiology and works with Virginia's children to access diagnostic services, intervention and supports, this issue is very important to me. Children and individuals with special needs require unique and specialized professionals on their teams. Audiology is no different. Delays in licensure will reduce Virginian children's access to quality and competent care. It is well known that early intervention significantly decreased the long term costs associated with disability. Delays in

licensure can delay a child's intervention. I absolutely believe that restoration of ABA certification as an avenue to Virginia licensure will benefit both professionals and patients.

I qualified for board certification in pediatric audiology more than 12 years ago. This certification requires continued education beyond standard continuing education courses, and beyond the requirements of licensure alone. Maintaining this certification has ensured that I continue to learn as audiology - and pediatrics - evolves. I fear that should ABA not be restored on the pathway to Virginia licensure that southeastern Virginia will suffer drastically as a result. There are few pediatric audiologists in this area and a good portion of them carry ABA credentials. Please do not hurt Virginians.

Thank you for your work to modernize and clarify audiology licensure regulations in Virginia. I appreciate the opportunity to comment on this amendment and encourage the Board to move forward with recognizing ABA certification as an accepted pathway to licensure.

Sincerely,

Anne Dare, AuD, ABAC, BCPA

Pediatric Audiologist

Macon & Joan Brock Virginia Health Sciences at Old Dominion University

Norfolk, VA

CommentID: 239613

Commenter: Stephanie Czuhajewski, Academy of Doctors of Audiology

2/11/26 10:09 am

ADA Comments Proposed Amendment of 18VAC30-21-60(A)

Kelli Moss
Executive Director
Virginia Board of Audiology and Speech Language Pathology
9960 Mayland Drive
Suite 300
Henrico, VA 23233
Via public comment

Re: Proposed Amendment of 18VAC30-21-60(A) to Add ABA Certification to Regulation Offering Expedited Pathway to Audiology Licensure

Dear Ms. Moss,

The Academy of Doctors of Audiology (ADA), a national association representing audiologists in Virginia and throughout the United States, appreciates the opportunity to submit comments regarding potential amendments to 18VAC30-21-60(A). While we understand that the proposed action to re-add American Board of Audiology (ABA) certification as an additional option to expedited audiology licensure, is well intended, there is a better solution.

Virginia regulations compelling either ASHA or ABA certification, as a condition of, or as a pathway to expedited audiology licensure, should be completely abolished. Licensing laws were established to provide important consumer protections and promote a culture of patient safety. They should not be used solely to benefit accrediting bodies and their parent trade associations at the expense of licensees and consumers.

ADA opposes the adoption of provisions reinstating ABA certification as a shortcut to audiology licensing in Virginia. ADA also opposes existing Virginia regulations that unfairly reward ASHA-certified audiologists with an expedited pathway to licensure.

State laws that require an audiologist to be certified by the American Speech-Language-Hearing Association (ASHA) or the American Board of Audiology (ABA), as either a condition for licensure, or as an easier pathway to licensure, coerce audiologists into paying high fees to subsidize the certifying bodies and their parent associations in exchange for a license to practice. This “certification tax” offers absolutely no benefit to the public. On the contrary, it unnecessarily increases the cost of services delivered. ASHA annual certification maintenance fees are \$446^[1] for non-member audiologists and ABA annual certification fees for non-members of the American Academy of Audiology (AAA), of which it is a wholly owned subsidiary are \$225.^[2]

State licensing laws governing audiology in Virginia already include rigorous academic and clinical standards, including, “documentation of graduation from a program accredited by the Council on Academic Accreditation of ASHA or an equivalent accrediting body recognized by the board.” If ASHA, and presumably the Accreditation Commission for Audiology Education (ACAE) under the American Academy of Audiology (AAA), are the only two accrediting bodies that meet this requirement, ASHA and AAA presumably are already ensuring that audiologists are licensure-qualified upon graduation from their academic training programs a Doctor of Audiology degree. It is redundant then to incentivize ASHA or AAA certification as an expedited pathway for initial licensure in the Commonwealth.

Both ASHA and ABA certification can be readily obtained by new graduate, entry-level audiologists. Neither certification embodies a meaningful board certification in the traditional sense, and both can be maintained merely by paying an annual fee and obtaining a certain number of continuing education credits, which often mirror what states, including Virginia, already independently require for licensure maintenance.

There are no data to support that Virginia audiologists holding ASHA and/or ABA certification have better clinical outcomes or enhanced performance in any way, compared with audiologists who do not hold those certifications. There is no evidence indicating enhanced clinical competence or improved patient outcomes as a result of carrying either certification.

ASHA unfairly ties its membership and certification by making it totally implausible for practicing clinical audiologists to hold ASHA membership without also purchasing its certification. ASHA’s Code of Ethics reads, “ASHA members who do not hold the Certificate of Clinical Competence may not engage in the provision of clinical services; however, individuals who are in the certification application process may provide clinical services consistent with current local and state laws and regulations and with ASHA certification requirements.”^[3] Virginia’s state laws should not perpetuate ASHA’s tying scheme by requiring audiologists to become certified as a condition of or a means to obtain an expedited pathway to licensure.

ADA respectfully requests that regulators eliminate certification entirely from section 18VAC30-21-60(A) and abolish any other Virginia laws that favor certified audiologists and provide them an easier pathway to licensure. Audiology education and training requirements for licensure in Virginia already provide sufficient safeguards to protect consumers and to ensure that audiologists meet minimum standards for education, clinical experience, and ethical practice.

Please contact me anytime if you have any questions or require additional information. Thank you for your thoughtful consideration of this important issue.

Sincerely,

Stephanie

Stephanie Czuhajewski, MPH, CAE
Executive Director
Email: sczuhajewski@audiologist.org
Mobile: (859) 321-1595

[1]. ASHA Certification Website: <https://www.asha.org/certification/slpcertification/?srsltid=AfmBOoqZ1x90EdncseReNL5G4iL32Dxlzj5iRLzHXCgGHHk6JzFyAez>

[2]. ABA Certification Website: <https://www.audiology.org/american-board-of-audiology/aba-certification/recertify/>

[3]. American Speech Language Hearing Association Code of Ethics: <https://www.asha.org/policy/code-of-ethics>

CommentID: **239639**

Submission of Comments on 18VAC30-21 Amendments

From Michelle Moore <mmoore@audiology.org>

Date Fri 2/6/2026 11:06 AM

To Moss, Kelli G. (DHP) <kelli.moss@dhp.virginia.gov>

Cc Joanne Zurcher <jzurcher@audiology.org>; Kathryn Werner <kwerner@AUDIOLOGY.org>; Patrick Gallagher <pgallagher@audiology.org>

 1 attachment (191 KB)

Comments on 18VAC 30-21 Amendments 2026 Final 2.6.26.pdf;

Good morning Kelli,

Attached are the Academy's comments on the proposed amendments to 18VAC30-21. We have also uploaded these comments to the Town Hall as requested.

Please feel free to reach out if you have any questions or need any additional information.

Best regards,

Michelle Moore

Manager, Government Relations

American Academy of Audiology

11480 Commerce Park Drive, Suite 220

Reston, VA 20191

mmoore@audiology.org

Cell: 703-999-8322

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Amplify Your Value at AAA 2026

Register and book housing now for the premier event in audiology, **April 22–25**.



February 6th, 2026

VA Professional and Occupational Licensing Board of Audiology and Speech-Language Pathology
9960 Mayland Drive
Suite 300
Henrico, VA 23233

Submitted Via Online Townhall & emailed to Executive Director Kelli Moss
(kelli.moss@dhp.virginia.gov)

Re: Amendment of 18VAC30-21-60(A) to include American Board of Audiology certification as an accepted pathway for audiologists applying for licensure

Dear Members of the Board,

The American Academy of Audiology (the Academy) appreciates the opportunity to submit comments in support of amending 18VAC30-21-60(A) to include American Board of Audiology (ABA) certification as an accepted pathway for audiologists applying for licensure. The Academy is the largest professional organization of, by, and for audiologists and is dedicated to advancing quality hearing and balance care through professional development, education, research, and increased public awareness.

The amendment seeks the restoration of ABA certification in the licensure regulations as an alternative pathway to audiology licensure while maintaining rigorous professional standards. When ABA certification was removed from the regulations, the result was not increased flexibility, but rather the elimination of a recognized pathway, leaving applicants with effectively a single certification-based option for licensure. This narrowing of pathways makes it more difficult for qualified audiologists to become licensed in Virginia.

ABA certification is a nationally recognized credential that reflects comprehensive education, examination, and professional requirements specific to the practice of audiology. The ABA certification process is designed exclusively for audiologists and requires demonstration of advanced competencies, making it a highly rigorous and profession-specific credential. In many respects, ABA certification represents a more specialized and stringent standard for the practice of audiology than broader certification pathways that are not exclusively focused on audiology.

Virginia's regulations already recognize certification as an expedited pathway to licensure, and if the Commonwealth recognizes the CCC, it should likewise recognize ABA certification. Explicitly restoring ABA certification alongside other accepted pathways would preserve applicant choice and accurately reflect the diverse, high-quality training routes within the audiology profession. Explicitly restoring ABA certification alongside other accepted pathways would preserve applicant choice, ensure recognition of a highly rigorous audiology-specific

credential, and accurately reflect the diverse, high-quality training routes within the audiology profession.

Thank you for your consideration of this amendment and for your continued work to modernize and clarify audiology licensure in Virginia. The Academy appreciates the opportunity to provide input on this petition and looks forward to continued collaboration with the Board. If you have any questions regarding these comments, please contact Joanne Zurcher, Vice President of Government Relations, at jzurcher@audiology.org.

Sincerely,

A handwritten signature in black ink, appearing to read "David Zapala". The signature is fluid and cursive, with the first name "David" and last name "Zapala" clearly distinguishable.

David Zapala, PhD

President, American Academy of Audiology

Speech Pathology/Audiology Monthly Snapshot for February 2026

Speech Pathology/Audiology closed as many cases in February as received. Speech Pathology/Audiology closed 0 patient care cases and 2 non-patient care cases for a total of 2 cases.

Cases Closed	
Patient Care	0
Non-Patient Care	2
Total	2

Speech Pathology/Audiology has received 1 patient care case and 1 non-patient care case for a total of 2 cases.

Cases Received	
Patient Care	1
Non-Patient Care	1
Total	2

As of February 28,2026, there were 9 patient care cases open and 4 non-patient care cases open for a total of 13 cases.

Cases Open	
Patient Care	9
Non-Patient Care	4
Total	13

There are 6,559 Speech Pathology/Audiology licensees as of February 28,2026. The number of current licenses are broken down by profession in the following chart.

Current Licenses	
Audiologist	647
School Speech-Language Pathologist	327
Speech-Language Pathologist	5,585
Total for Speech Pathology/Audiology	6,559

There were 57 licenses issued for Speech Pathology/Audiology for the month of February. The number of licenses issued are broken down by profession in the following chart.

Licenses Issued	
Audiologist	3
Provisional Speech-Language Pathologist	2
School Speech-Language Pathologist	4
Speech-Language Pathologist	48
Total for Speech Pathology/Audiology	57

AUDIOLOGY AND SPEECH-LANGUAGE PATHOLOGY

2026 CALENDAR

March 20, 2026 (Friday)	TR 1 9:00 AM	INFORMAL CONFERENCE(S)
April 21, 2026 (Tuesday)	BR 3 9 a.m.	BOARD MEETING FORMAL HEARING IF NEEDED
July 7, 2026 (Tuesday)	BR 4 9 a.m.	BOARD MEETING FORMAL HEARING IF NEEDED
September 25, 2026 (Friday)	TR 1 9:00 AM	INFORMAL CONFERENCE(S)
December 8, 2026 (Tuesday)	BR 3 9:00 AM	BOARD MEETING FORMAL HEARING IF NEEDED

CALENDAR_ASLP_2026