

Board of Audiology and Speech-Language Pathology

Agency Response to Economic Impact Analysis

The Board of Audiology and Speech-Language Pathology does not concur with the analysis of the Department of Planning and Budget on 18 VAC 30-20-10 et seq., Regulations Governing the Practice of Audiology and Speech-Language, relating to its assertions about the unnecessary burden of requiring an associate's or bachelor's degree for persons working as speech-language pathology assistants.

At its meeting on June 11, 2015, the Board considered the economic impact analysis prepared by DPB and chose to retain its original proposal for the following reasons:

- 1) While an assistant will perform activities as directed and supervised by a licensed speech-language pathologist (SLP), he will be providing significant services to clients, often with children or the elderly. The assistant must have the knowledge and skills to assist with screenings, assist with assessments, follow a treatment plan and document results, assist with programming devices and in training the client on such devices, and document performance and report to the SLP. Members concurred that a post-secondary level of education was essential for the core knowledge and skills to train an assistant for safe, competent practice. Much in the same way a basic baccalaureate degree is necessary to secure admission in graduate programs, the Board believes an associate's or bachelor's degree should be the foundational educational level for an assistant who will then receive special training in speech-language pathology duties.
- 2) By setting the qualification at the associate or bachelor level, the regulation may open opportunities for persons who hold those degrees but do not have specialized training and experience that qualifies them for employment.
- 3) It is not accurate to state that there are no bachelor's level programs in speech-language pathology or communication disorders. The agency background document has been revised to clarify that such programs and degrees are available and do graduate several hundred persons each year.
- 4) Current capacity for hiring bachelor's degree persons should be more than adequate to meet demand. A master's degree is required for licensure as an SLP. Recent information from masters-level programs in speech-language pathology or communication-speech disorders in Virginia indicates that there are significantly more applicants with bachelor's degrees than slots in graduate programs. At James Madison University, there were 249 applications for the online program, and 20 were admitted; there were 349 applications for the on-campus program; 22 were admitted. At Longwood University, there were 240 applications, 50 were admitted with intent of securing a class of 22. At the University of Virginia, there were 300 applicants for 25 available seats. It is apparent that there are several hundred graduates who have an interest in speech-language disorders who do not qualify for licensure but would benefit from the opportunity to be

hired as an assistant and gain valuable knowledge and experience to possibly help secure a position in a graduate program.

5) According to the Speech-Language Hearing Association of Virginia and the members of the Ad Hoc Committee and the Board, speech-language pathologists who work in private practices do not currently hire persons as SLP assistants who have less than a bachelor's degree, so it is not accurate to state there they will see increased costs or a decreased client capacity.

6) The EIA stated that the Assistant Attorney General advised the Board that it must include a requirement for "formal education." In fact, the AAG advised that the law specified that the Board must set "qualifications" for an assistant speech-language pathologist and that allowing them to be trained on-the-job was not necessarily a qualification for practice.

7) Finally, there were 6 persons who commented on the NOIRA that a bachelor's degree in speech-language or communication disorders should be the minimum qualification for an assistant SLP; two others stated that the minimum qualification should be a BA or BS.