

Roberts, Sullivan (RIDOH)

From: Pullano, Paula (RIDOH)
Sent: Friday, August 03, 2018 9:11 AM
To: Roberts, Sullivan (RIDOH)
Subject: FW: [EXTERNAL] : 216-RICR-40-05-33

From: Mary Boyle [mailto:mcboyle24@gmail.com]
Sent: Friday, August 3, 2018 7:40 AM
To: Pullano, Paula (RIDOH) <Paula.Pullano@health.ri.gov>
Subject: [EXTERNAL] : 216-RICR-40-05-33

Dear Ms. Pullano,

The RI Speech and Hearing Association wishes to ***strongly object*** to the changes in this amendment section 33.8 which removes requirements for the registration of support personnel, specifically Speech-Language Pathology Assistants (SLP-A).

RISHA cooperated in the formation of the original regulation which insured that support personnel were ***properly supervised and had the appropriate requirements to practice***. Without registration there will be no oversight of this process. This would be a disservice to the students and clients in Rhode Island receiving services from SLP-As who are unregulated and unregistered.

Thank you for your attention to this issue. Please contact me as a representative of the state association of Speech Language Pathologists and Audiologists should you require any additional information or comment.

Respectfully,

Mary C. Boyle, M.S., CCC-SLP
RISHA President

Roberts, Sullivan (RIDOH)

From: Pullano, Paula (RIDOH)
Sent: Tuesday, August 07, 2018 9:53 AM
To: Roberts, Sullivan (RIDOH)
Subject: FW: [EXTERNAL] : RIDOH Proposed Amendment: Regulations for Speech Pathologists and Audiologists (216-RICR-40-05-33)

From: mary patty [mailto:marypatty@msn.com]
Sent: Monday, August 6, 2018 10:28 AM
To: Pullano, Paula (RIDOH) <Paula.Pullano@health.ri.gov>
Subject: [EXTERNAL] : RIDOH Proposed Amendment: Regulations for Speech Pathologists and Audiologists (216-RICR-40-05-33)

Dear Ms. Pullano,

I am writing in response to the RIDOH proposed amendment to the rules and regulations for Speech Pathologists and Audiologists (216-RICR-40-05-33).

As a practicing speech-language pathologist in the Rhode Island public schools and a member of both local (RISHA) and national (ASHA) professional organizations for speech-language pathologists, I object to the elimination of the following provision from Section 33.8:

Registration of Speech Language Support Personnel. All speech language support personnel shall be registered with the Department within thirty (30) days of beginning work or the supervising speech language pathologist will be assessed a late filing fee as set forth in the Rules and Regulations Pertaining to the Fee Structure for Licensing, Laboratory and Administrative Services Provided by the Department of Health.

In the public schools, speech language pathologists (SLPs), physical therapists (PTs), and occupational therapists (OTs) play a critical role in supporting access to education for all students. The Rhode Island Department of Education places individuals in these professions in a category called "support professionals." IEP services mandated by state and federal law are delivered by individuals in each of these professions.

In the **RULES AND REGULATIONS FOR LICENSING OCCUPATIONAL THERAPISTS AND OCCUPATIONAL THERAPY ASSISTANTS [R5-40.1-OCC]** as well as the **RULES AND REGULATIONS FOR LICENSING PHYSICAL THERAPISTS AND PHYSICAL THERAPIST ASSISTANTS [R5-40-PT/PTA]**, OT and PT assistants must: 1) successfully pass a national exam; 2) maintain licensure with the RIDOH; and 3) complete continuing education units in their respective fields.

At present, the registration requirement for Speech Language Support Personnel is the only RIDOH option provided for this category. Given that the State of Rhode Island does not currently have a formal licensing category for Speech Language Therapy Assistants as it does for OT and PT assistants, it is critical that this requirement be maintained for the purposes of oversight and ensuring the qualifications of Speech Language Support Personnel.

Respectfully yours,

Mary Patty, M.S., CCC SLP

Narragansett School System



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

Submitted via email to: paula.pullano@health.ri.gov

August 8, 2018

Paula Pullano
Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908-5097

RE: Amendments to Speech Pathologist and Audiologist Rules

Dear Ms. Pullano:

On behalf of the American Speech-Language-Hearing Association, I write to express concerns regarding the proposed amendments to the rules and regulations for speech pathologists and audiologists (216-RCR-40-05033).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 700 of our members reside in Rhode Island.

ASHA is concerned with the current requirement of eighteen (18) hours of graduate credit and 25% practicum hours for speech-language pathologists. **ASHA recommends support personnel receive an associate's or bachelor's degree and 100 hours of supervised clinical experience to be completed at the educational institution or during the first year of employment.*** ASHA supports the use of trained and supervised support personnel but is concerned that the requirement of additional graduate hours and practicum experience prior to employment may limit the ability of support personnel to find positions in Rhode Island.

ASHA is also concerned with the proposed removal of the current requirement for support personnel to register with the State Board of Examiners in Speech-Language Pathology and Audiology. **ASHA maintains that support personnel, and their supervisors, should be registered with the Board in order to ensure individuals are qualified and competent to perform this occupation.**

Thank you for the opportunity to provide comments on this regulation. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,

Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President

*The American Speech-Language-Hearing Association. (2014). *Model Bill for State Licensure of Audiologists, Speech-Language Pathologists, and Audiology and Speech-Language Pathology Assistants*. Retrieved from <https://www.asha.org/uploadedFiles/State-Licensure-Model-Bill.pdf>.

Roberts, Sullivan (RIDOH)

From: Pullano, Paula (RIDOH)
Sent: Friday, August 10, 2018 9:37 AM
To: Roberts, Sullivan (RIDOH)
Subject: FW: [EXTERNAL] : RI DOH regulations

From: Ellen Connery [mailto:econnslp@icloud.com]
Sent: Thursday, August 9, 2018 10:10 PM
To: Pullano, Paula (RIDOH) <Paula.Pullano@health.ri.gov>
Subject: [EXTERNAL] : RI DOH regulations

~~**Subject:** RIDOH Proposed Amendment: Regulations for Speech Pathologists and Audiologists (216-RICR-40-05-33)~~

Dear Ms. Pullano,

I am writing in response to the RIDOH proposed amendment to the rules and regulations for Speech Pathologists and Audiologists (216-RICR-40-05-33).

As a practicing speech-language pathologist in Rhode Island and a member of both local (RISHA) and national (ASHA) professional organizations for speech-language pathologists, I am writing to express my concern regarding the recommendation for the elimination of the following provision from Section 33.8:

Registration of Speech Language Support Personnel. All speech language support personnel shall be registered with the Department within thirty (30) days of beginning work or the supervising speech language pathologist will be assessed a late filing fee as set forth in the Rules and Regulations Pertaining to the Fee Structure for Licensing, Laboratory and Administrative Services Provided by the Department of Health.

In the public schools, speech language pathologists (SLPs), physical therapists (PTs), and occupational therapists (OTs) play a critical role in supporting access to education for all students. The Rhode Island Department of Education places individuals in these professions in a

category called "support professionals." IEP services mandated by state and federal law are delivered by individuals in each of these professions.

In the **RULES AND REGULATIONS FOR LICENSING OCCUPATIONAL THERAPISTS AND OCCUPATIONAL THERAPY ASSISTANTS [R5-40.1-OCC]** as well as the **RULES AND REGULATIONS FOR LICENSING PHYSICAL THERAPISTS AND PHYSICAL THERAPIST ASSISTANTS [R5-40-PT/PTA]**, OT and PT assistants must: 1) successfully pass a national exam; 2) maintain licensure with the RIDOH; and 3) complete continuing education units in their respective fields.

At present, the registration requirement for Speech Language Support Personnel is the only RIDOH option provided for this category. Given that ~~the State of Rhode Island does not currently have a formal licensing~~ category for Speech Language Therapy Assistants as it does for OT and PT assistants, it is critical that this requirement be maintained, at the very least, as a minimal requirement for the purposes of oversight and ensuring the qualifications of Speech Language Support Personnel.

I would also like to express my concerns regarding section 33.5 Qualifications for licensure. It appears that qualifications for audiologists will remain the same, but those for speech-language pathologists will change. Both SLPs and AuDs are required to meet the same standards for Certificates of Clinical Competence (CCC) that include; 1) passing a national examination 2) completion of 12 months of supervised employment.

The highest quality standard is obtaining a certificate of clinical competence from ASHA and should be the entry level standard for professional licensure. In addition, proof of maintaining the Certificate of Clinical Competence (CCC) should be required when a SLP is completing the application for license renewal.

The RI Speech-Language-Hearing Association is very interested in working with the RI Department of Health to ensure that the highest qualified professionals are serving the RI Community.

Respectfully yours,

Ellen Connery, M.S. CCC-SLP
RI Speech-Language-Hearing Association Treasurer

Sent from my iPad

Roberts, Sullivan (RIDOH)

From: Pullano, Paula (RIDOH)
Sent: Friday, August 10, 2018 9:38 AM
To: Roberts, Sullivan (RIDOH)
Subject: FW: [EXTERNAL] : Speech/Language support personnel

From: Nancy Gage [mailto:sptherapy@gmail.com]
Sent: Friday, August 10, 2018 7:31 AM
To: Pullano, Paula (RIDOH) <Paula.Pullano@health.ri.gov>
Subject: [EXTERNAL] : Speech/Language support personnel

Dear Ms. Pullano,

I am writing in response to the RIDOH proposed amendment to the rules and regulations for Speech Pathologists and Audiologists (216-RICR-40-05-33).

As a practicing speech-language pathologist in the Rhode Island public schools for over 30 years and a member of both local (RISHA) and national (ASHA) professional organizations for speech-language pathologists, I object to the elimination of the following provision from Section 33.8:

Registration of Speech Language Support Personnel. All speech language support personnel shall be registered with the Department within thirty (30) days of beginning work or the supervising speech language pathologist will be assessed a late filing fee as set forth in the Rules and Regulations Pertaining to the Fee Structure for Licensing, Laboratory and Administrative Services Provided by the Department of Health.

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professions in a category called "support professionals." IEP services mandated by state and federal law are delivered by individuals in each of these professions.

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At present, the registration requirement for Speech Language Support Personnel is the only RIDOH option provided for this category. Given that the State of Rhode Island does not currently have a formal licensing category for Speech Language Therapy Assistants as it does for OT and PT assistants, it is critical that this requirement be maintained for the purposes of oversight and ensuring the qualifications of Speech Language Support Personnel.

Respectfully yours,
Nancy Gage