

DATE: 4/27/2025

My name is Amy Herlihy and I live in Representative Boylan's district. I am writing to oppose H 557 which would amend licensure requirements for Speech-Language Pathologists. I am a Speech-Language Pathologist (SLP) who has worked in 4 states and in a wide variety of settings, including public and private schools, acute care, subacute care, home care, long term care and Early Intervention. I have held a Certificate of Clinical Competence (CCC) from the American Speech-Language Hearing Association (ASHA) since 2001. I am also a member of the Rhode Island Speech and Hearing Association.

First, I am concerned that the bill proposes SLPs will no longer be required to maintain their ASHA CCCs in order to be eligible for a Rhode Island Department of Health SLP license. ASHA certified SLPs have met high academic and professional standards which indicates that we have the knowledge, skills and expertise to provide a high quality of clinical care. In addition, ASHA certified SLPs have access to cutting edge research and publications to support and enhance our use of best clinical practices. The people of Rhode Island deserve to be evaluated and treated by SLPs who maintain the highest standards of practice. By not requiring ASHA certification for licensure the quality of speech-language services in our state would significantly decline. [Benefits of ASHA Certification in Audiology and Speech-Language Pathology](#)

In addition, I am also very concerned that the proposed changes to professional development requirements do not mirror ASHA's in terms of requiring professional development in key areas that support person-centered care and a high standard of practice. I am specifically referring to the following training requirements that are proposed to be eliminated, which are: cultural humility, cultural competency, culturally responsive practice or diversity, equity and inclusion and ethics. By omitting the requirement of such trainings SLPs would be at significant risk of making unethical decisions and/or not having the knowledge or expertise to advocate for themselves and/or their patients when they are asked to practice in unethical ways by their employers. By omitting trainings that address diversity, equity and inclusion and

cultural humility SLPs would not have the tools to foster a workplace of belonging, safety and innovation, in addition to lacking the skills to conduct their work with cultural compassion and care, which I believe, will result in reduced progress and success for those we serve. [Requirements for Maintaining Your ASHA Certification](#)

I am also very concerned about the proposed change to the Speech-Language Pathology-Assistant (SLP-A) requirements. As I understand it the proposed bill only requires SLP-As to **observe** 20 hours of work with a SLP, as compared to ASHA's SLP-A requirements that the candidate complete direct, supervised work in the field. That means SLP-As who have no experience working in the field could be licensed. I would not feel comfortable with a SLP-A who has no practical experience working under my license. In my professional opinion, the SLP-A could not work independently for a very long time, and the time and effort required to train these individuals would be a significant burden on the SLP. I am also worried that employers would potentially force SLPs to have SLP-As work independently before they demonstrate the competence to do so. But more importantly, the people of Rhode Island who require our services deserve better- they deserve a highly skilled and trained SLP-A.

I am well aware that SLP staffing shortages exist in Rhode Island, however, this bill is not the answer. Attracting and retaining highly qualified SLP staff should be our goal.