

**Association of RI Administrators of Special Education: In support of H 5557**

***Sent via email to [housecorporations@rilegislature.gov](mailto:housecorporations@rilegislature.gov)***

April 24, 2025

Representative Joseph J. Solomon, Jr., Chairman  
House Corporations Committee  
Rhode Island General Assembly  
73 Smith Street  
Providence, RI 02903

Dear Chairman Solomon,

I write as legal counsel for the Association of Rhode Island Administrators of Special Education ("ARIASE") to support H 5557 and offer input on the supervisory requirements that it would put in place for Speech-Language Pathologists ("SLPs") charged with oversight of Speech-Language Pathology Assistants ("SLPAs"). ARIASE is the lone statewide association of special education administrators in Rhode Island, and its members are passionately committed to serving students with disabilities and working collaboratively with their families to enhance their educational opportunities and outcomes.

The members of ARIASE are grateful to Representative Shallcross Smith and her co-sponsors for recognizing how challenging it has become for Rhode Island's public schools to find and retain the qualified professionals they need in order to adequately provide the special education and related services necessary to ensure that all students with disabilities receive a free appropriate public education in the least restrictive environment. ARIASE welcomes the sponsors' thoughtful and thorough approach to updating the certification standards for SLPAs, and embraces the proposed changes to RIGL 5-48.2-8 that H5777 would effectuate. However, given the reality of how overextended SLPs already are in schools across our state, special education directors are wary of the heightened supervisory that the proposed revisions to RIGL 5-48.2-8 would place on SLPs.

SLPAs are the support professionals for SLPs. In similar areas, such as physical therapy and occupational therapy, the support professionals ("PTAs" and "COTAs", respectively) are required to have supervision from licensed Physical Therapists ("PTs") and Occupational Therapists ("OTRs"), but the supervision required in those fields is less rigid and does not prescribe ratios of licensed supervisors to support professionals (e.g. PT to PTA or OTR to COTA). The supervisory requirements for SLPA proposed in H5557 do.

The members of ARIASE recognize that these regulations are being revised and that there might be some extra caution to allow SLPs to adapt to supervision, but would respectfully suggest a supervision model that would be less prescriptive, and would allow supervision to include in-person and on-site supervision time. We also recommend a supervisory model that allows the licensed SLP to determine the amount of time and type of supervision needed for the SLPA based on each SLPA's relative experience and competence. As written, H5557 would require SLPAs to be supervised for thirty percent of their working time (twenty percent direct supervision and ten percent indirect supervision)

during their first ninety days of employment. Ninety days is half of a school year, and during that a supervising SLP would have thirty percent less time to work with the students whom they serve. With the transiency of the workforce this would be extremely challenging for a school district to manage.

ARIASE enthusiastically supports H 5557 and welcomes the effort to expand the pool of qualified speech and language professionals available to meet the vast student need. And ARIASE members certainly recognize the need for clinical supervision of SLPAs, but advocate for an approach that is more aligned with the supervisory requirements in place in the fields of physical therapy and occupational therapy. The leadership of ARIASE would welcome the opportunity to discuss the nuances of the supervisory requirements proposed in H5777. Thank you for your consideration, and please do not hesitate to contact me if you have any questions.

Sincerely,



Timothy J. Groves, Esq.