



March 14, 2025

Dr. Cory Murphy
Associate State Superintendent
Mississippi Department of Education
Division of Educator Licensure
359 N. West Street
P.O. Box 771
Jackson, MS 39205-0771

RE: Speech Associate Regulations

Dear Dr. Murphy:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to recommend amendments to the proposed school-based Speech Associate regulations, which currently extend beyond the scope, education, and training of these practitioners.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 1,900 ASHA members reside in Mississippi.¹

ASHA is concerned with the proposed Speech Associate regulations as some of the provisions fall within the scope of practice for licenced SLPs rather than within a Speech Associate's scope based on education and training. An SLP has a master's degree, supervised clinical experience, and state license. They may also have a Certificate of Clinical Competence. SLPs identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders. They may serve as supervisors for Speech Associates. In contrast, Speech Associates have a bachelor's degree in speech pathology, communication disorders, or speech and hearing science as well as a 21 ACT score (or SAT equivalent) or have passed the Praxis for Educators exam.

ASHA offers the following amendments to the proposed Speech Associate regulations to better align with the Speech Associate's education and training.

Recommended Amendments to Five-Year Educator License Category

Under the five-year educator license category, we recommend adding the underlined language and deleting the language in red below to provide greater specificity of what is appropriate for the Speech Associate and to eliminate redundancies:

This is a five-year license issued on the bachelor's level for Speech Associate. The bachelor's level Speech Associate may provide limited services to students. A bachelor's level Speech Associate shall provide functional articulation therapy, articulation testing, and administer and score articulation assessment tools if the

Speech Associate meets the examiner requirements specified in the examiner's manual. The supervising speech-language pathologist shall verify the Speech Associate's competence in administration, exclusive of clinical interpretation, to provide direct therapy services addressing treatment goals developed by the supervising speech-language pathologist to meet the needs of the student, patient, client, and family, and provide speech therapy. The Speech Associate shall not have their own caseload.

We recommend moving "articulation testing" before "articulation therapy" in the paragraph above, as SLPs test before providing therapy.

ASHA recommends the removal of writing Individualized Educational Plans (IEPs) for Speech Associates, as writing IEPs requires the training and education possessed by SLPs who are part of the IEP development team.

We recommend amending the remainder of the section below with additions underlined and deletions in red:

The Speech Associate shall not provide language therapy, language assessments, voice or fluency or the corresponding assessments and shall not chair any type of eligibility determination committee shall not engage in providing feeding/swallowing care, input in care conferences, case conferences, or any interdisciplinary team meeting without the presence or prior approval of the supervising speech-language pathologist, or other designated speech-language pathologist, and shall not engage in interpreting assessment tools for the purpose of diagnosing disability or determining eligibility or qualification for services. The bachelor's level Speech Associate must be supervised by a master's level fully certified Speech/Language Clinician.

We recommend moving "language assessment" before "language therapy" in the paragraph above, as SLPs assess before providing therapy.

Thank you for considering ASHA's comments on the proposed Speech Associate regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

A. B. Mayfield-Clarke, PhD, CCC-SLP

2025 ASHA President

¹ American Speech-Language-Hearing Association. (2023). *Mississippi* [Quick Facts]. https://www.asha.org/siteassets/advocacy/state-fliers/mississippi-state-flyer.pdf