Navigating the Maze of Speech Therapy Licensure in Arizona

This booklet was created by members of the Arizona Speech-Language-Hearing Association (ArSHA) Executive Board with the financial support of a state personnel grant from the American Speech-Language-Hearing Association (ASHA)

Published November, 2011
Special thanks to the following individuals for their contributions toward the creation of this document: Crystal Brooks, Angela Curtright, Kim Farinella, Cass Faux, Amy Heck, Jeff Meeks, Lori Taniguchi, and Debbie Venkatesh
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Introduction

The profession of “speech correctionist” began in the early 1900s. Over the years, this profession has evolved and widened in scope of practice. Over the last 30 years, educational requirements and professional titles have also changed. Currently, the gold standard for speech and language practitioners in the public schools is a master’s degree in Speech-Language Pathology and the Certificate of Clinical Competence (CCC) awarded by the American Speech-Language-Hearing Association. However, each state has different titles for practitioners and different requirements as to what is required to work in the public schools. As a result, there is confusion regarding the titles of various practitioners and requirements needed to practice. In Arizona, school based practitioners adhere to laws and requirements set forth by the Arizona Department of Education (ADE) and the Arizona Department of Health Services (ADHS). These agencies also differ in the practitioners’ titles. For example, the Arizona Department of Education recognizes a Speech-Language Pathologist (SLP) and a Speech-Language Technician (SLT). The Arizona Department of Health Services issues regular, limited, and temporary licenses depending on the level of education and credentials one has in speech-language pathology. Additionally, the ADHS licenses a third type of practitioner, the Speech-Language Pathology Assistant (SLPA). This document will discuss the different practitioner titles, their requirements and credentials as delineated by the Arizona Department of Education (ADE) and the Arizona Department of Health Services (ADHS).
Speech-Language Pathologist

Description of Position/Duties

ASHA certified speech-language pathologists (SLPs) are autonomous professionals (i.e., do not require supervision) who provide clinical services (e.g., assessment, diagnosis, planning, and treatment), prevention, and advocacy, as well as education, administration, and research in the areas of communication (typical and atypical) and swallowing (ASHA, 2007) in a variety of clinical settings. ASHA certified SLPs may work in public or private schools, early intervention settings, medical settings (e.g., hospitals), private practice, universities and university clinics, community, state, and federal agencies or institutions, correctional facilities, research institutions, or corporate and industrial settings (ASHA 2007).

Specifically, speech-language pathologists evaluate and treat disorders related to speech sound production (e.g., articulation, dysarthria), resonance (e.g., hypernasality), voice (e.g., vocal quality, pitch), fluency (i.e., stuttering, cluttering), language (e.g., comprehension, verbal expression, pragmatic language), cognition (e.g., problem solving, attention), and feeding and swallowing (e.g., oral-motor functions) due to any etiology that may impact an individual’s communication and swallowing abilities (ASHA, 2007). According to ASHA’s *Scope of Practice in Speech-Language Pathology* guidelines, speech-language pathologists:

- Provide prevention, screening, and pre-referral clinical services across the lifespan,
- Make service delivery decisions (e.g., frequency/duration of services) and determine context for service delivery (e.g., home versus school),
- Collect and use data to guide clinical decisions,
- Maintain written documentation of clinical services,
- Use instrumentation when deemed appropriate (e.g., videofluoroscopy, nasoendoscopy),
- Serve as case managers, service coordinators,
- Collaborate and team with other professionals (e.g., physical therapists, occupational therapists, teachers),
- Provide counseling to persons with communication and/or swallowing disorders, their families, caregivers, etc.,
- Aid in obtaining funding for equipment or services for individuals with communication and/or swallowing disorders,
- Provide referrals and information to pertinent professionals,
- Determine and establish effective use of prosthetic/adaptive devices (e.g., speaking valves) and multimodal augmentative and alternative communication systems,
- Address behaviors (e.g., impulsivity) and environmental factors (e.g., classroom noise) that may affect communication and swallowing.

An ASHA-certified SLP with at least 2 years experience following his/her certification may supervise, train, and use up to 3 SLPAs at his/her work setting. The exclusive responsibilities of the SLP,
according to ASHA’s *Guidelines for Training, Use, and Supervision of Speech-Language Pathology Assistants*, include:

- Initial supervision training prior to accepting an assistant for supervision and upgrade supervision training on a regular basis
- Significant participation in hiring the assistant
- Document pre-service training of the assistant
- Provide ongoing training to the assistant
- Inform patients/clients and families about the frequency and duration of services, and level of supervision
- Make all clinical decisions (e.g., eligibility for services; dismissal from treatment)
- Communicate with clients, parents, and family members about diagnosis, prognosis, and treatment plan
- Conduct diagnostic evaluations and interpret data/results
- Review each treatment plan with the assistant at least weekly
- Delegate specific tasks to the assistant while retaining legal and ethical responsibility for all patient/client services
- Prepare individualized treatment plans and make modifications as necessary
- Refer patient/client to other professionals when appropriate
- Sign all formal documents
- Review and sign all informal progress notes prepared by the assistant
- Provide and document appropriate supervision of the assistant
- Ensure the assistant only performs tasks within the ASHA-approved job responsibilities of the speech-language pathology assistant
- Participate in performance appraisal of the assistant

**Educational Requirements (i.e., academic and clinical)**

ASHA certified speech-language pathologists hold a master’s, doctoral, or other recognized post-baccalaureate degree in the area of speech-language pathology (ASHA, 2007). The graduate program of study must be accredited by the Council of Academic Accreditation in Audiology and Speech-Language Pathology (CAA) and the graduate degree must be granted by a regionally accredited institution of higher education.

ASHA further states the following:

“The applicant for (ASHA) certification must complete a program of study (a minimum of 75 semester credit hours overall, including at least 36 at the graduate level) that includes academic course work sufficient in depth and breadth to achieve the specified knowledge outcomes;”

Specifically, “the applicant must have prerequisite knowledge of the biological sciences, physical sciences, mathematics, and the social/behavioral sciences. He/she must demonstrate
knowledge of basic human communication and swallowing processes, including their biological, neurological, acoustic, psychological, developmental, and linguistic and cultural bases, and must demonstrate knowledge of the nature of speech, language, hearing, and communication disorders and differences and swallowing disorders, including the etiologies, characteristics, anatomical/physiological, acoustic, psychological, developmental, and linguistic and cultural correlates. Specific knowledge must be demonstrated in the following areas:

- articulation
- fluency
- voice and resonance, including respiration and phonation
- receptive and expressive language (phonology, morphology, syntax, semantics, and pragmatics) in speaking, listening, reading, writing, and manual modalities
- hearing, including the impact on speech and language
- swallowing (oral, pharyngeal, esophageal, and related functions, including oral function for feeding; orofacial myofunction)
- cognitive aspects of communication (attention, memory, sequencing, problem-solving, executive functioning)
- social aspects of communication (including challenging behavior, ineffective social skills, lack of communication opportunities)
- communication modalities (including oral, manual, augmentative, and alternative communication techniques and assistive technologies).

Additionally, “the applicant must possess knowledge of the principles and methods of prevention, assessment, and intervention for people with communication and swallowing disorders, including consideration of anatomical/physiological, psychological, developmental, and linguistic and cultural correlates of the disorders;”

Clinically, “the applicant for certification in speech-language pathology must complete a minimum for 400 clock hours of supervised clinical experience in the practice of speech-language pathology. Twenty-five hours must be spent in clinical observation, and 375 hours must be spent in direct client/patient contact (At least 325 of the 400 clock hours must be completed while the applicant is engaged in graduate study in a program accredited in speech-language pathology by the Council on Academic Accreditation in Audiology and Speech-Language Pathology);”

“Supervised practicum must include experience with client/patient populations across the life span and from culturally/linguistically diverse backgrounds. Practicum must include experience with client/patient populations with various types and severities of communication and/or related disorders, differences, and disabilities;”

“The applicant must pass the national examination adopted by ASHA for purposes of certification in speech-language pathology;”
“After completion of academic course work and practicum (Standard IV), the applicant then must successfully complete a Speech-Language Pathology Clinical Fellowship (SLPCF); The Speech-Language Pathology Clinical Fellowship (SLPCF) will consist of the equivalent of 36 weeks of full-time (i.e., minimum of 35 hours per week) clinical practice;”

Once all of these requirements are satisfied, the individual may apply for ASHA’s Certificate of Clinical Competence in Speech-Language Pathology (CCC-SLP).

ASHA certification and Arizona state licensure requirements differ for the graduating student from an accredited Arizona University. Arizona licensure requires 300 clock hours that include at least 20 clock hours in audiology and a minimum of 20 clock hours in each of the following categories:

- evaluation of speech disorders in children;
- evaluation of language disorders in children;
- evaluation of speech disorders in adults;
- evaluation of language disorders in adults;
- treatment of speech disorders in children;
- treatment of language disorders in children;
- treatment of speech disorders in adults; and
- treatment of language disorders in adults;

Continuing Education

ASHA certified speech-language pathologists are mandated to obtain 30 contact hours of professional development over a 3-year period to maintain the Certificate of Clinical Competence in Speech-Language Pathology. According to ASHA, professional development hours may be obtained in the following ways:

“Accumulation of 3 Continuing Education Units (CEUs) (30 contact hours) from continuing education providers approved by ASHA. ASHA CEUs may be earned through group activities (e.g., workshops, conferences), independent study (e.g., course development, research projects, internships, attendance at educational programs offered by non-ASHA CE providers), and self-study (e.g., videotapes, audiotapes, journals);”

“Accumulation of 3 CEUs (30 contact hours) from a provider authorized by the International Association for Continuing Education and Training (IACET);”

“Accumulation of 2 semester credit hours (3 quarter-hours) from a college or university that holds regional accreditation or accreditation from an equivalent nationally recognized or governmental accreditation authority;”

“Accumulation of 30 contact hours from employer-sponsored in-service or other continuing education activities that contribute to professional development.”
Arizona Department of Health Services Licensure

The Arizona Department of Health Services (ADHS) requires speech-language pathologists to hold an Arizona Department of Health Services Speech-Language Pathology license. To apply for a temporary CFY Arizona license in speech-language pathology, the following documentation is required:

- Written documentation of a masters degree in Speech-Language Pathology, or an official transcript demonstrating completion of the required coursework
- Written documentation of completion of a clinical practicum (clock hours) showing specific clock hours for both child and adult treatment and evaluation
- Written documentation of a passing grade on the ETSNESPA (PRAXIS)
- Copy of the Clinical Fellowship Report signed by the Clinical Fellow Supervisor

OR


ASHA certified, state licensed SLPs also participate in medical billing and Medicaid billing (i.e., in participating school districts).

Arizona Department of Education Certification

SLPs who work in the public school setting in the state of Arizona must obtain an Arizona Department of Education Speech-Language Pathologist Certificate. The applicant for this certificate must have a master’s degree in speech-language pathology or communication sciences and disorders from an accredited institution. The applicant does not need to have ASHA’s Certificate of Clinical Competence (CCC-SLP). The Arizona Department of Education certificate may be renewed with completion of 60 clock hours of professional development in the field of speech-language pathology, or professional development in the areas of articulation, voice, fluency, language, low incidence disabilities, curriculum and instruction, professional issues and ethics, or service delivery models.

References:


Speech-Language Technician

Description of Position/Duties

Speech-language technicians (SLTs) are autonomous professionals (i.e., do not require supervision) who provide clinical services (e.g., assessment, planning, and treatment) in a school setting. SLTs are restricted to working in a school setting and may not work in home-based, early intervention, or medical settings. Due to the limited scope of practice, SLTs focus on educationally-based services which include assessment of communication disorders, participation in the Multidisciplinary Evaluation Team, IEP team, and providing intervention for communication disorders. SLTs must be certified by the Arizona Department of Education and licensed by the Arizona Department of Health Services. SLTs are not eligible for certification by the American Speech-Language-Hearing Association.

Speech-language technicians (SLTs) assess and treat disorders related to speech sound production (e.g., articulation, dysarthria), fluency (i.e., stuttering, cluttering), and language (e.g., comprehension, verbal expression, pragmatic language). In addition, Arizona statute allows for SLTs to perform the following duties within the school environment:

- Provide prevention, screening, and pre-referral clinical services for students ages 3-21
- Make service delivery decisions (e.g., frequency/duration of services) and determine context for service delivery (within the school setting)
- Collect and use data to guide clinical decisions
- Maintain written documentation of clinical services
- Serve as case managers
- Collaborate and team with other professionals (e.g., physical therapists, occupational therapists, teachers)
- Provide referrals and information to pertinent professionals
- Address behaviors (e.g., impulsivity) and environmental factors (e.g., classroom noise) that may affect communication

Educational Requirements (i.e., academic and clinical)

Individuals seeking licensure as a Speech-language technician (SLT) must possess a minimum of a Bachelor’s degree from an accredited program in Speech-Language Pathology, Speech-Hearing Sciences, or Communication Disorders. Coursework should include classes related to articulation/phonology, childhood language, and cover topics related to assessment and intervention for communication disorders. In addition to academic coursework, the applicant must have a minimum of 50 hours of university supervised observation and 150 hours of clinical experience supervised by a Master’s level Speech-Language Pathologist.

Continuing Education

A Speech-language technician (SLT) must accumulate 180 clock hours of graduate level coursework every six years, in the field of speech pathology, or professional development in the areas of
articulation, voice, fluency, language disorders, low incidence disabilities, professional issues and ethics, or service delivery models to renew their certification with the Arizona Department of Education. The Arizona Department of Health Services requires 10 hours of continuing education coursework each year in areas related to clinical services provided by the SLT. Training in special education paperwork and other non-clinical topics are not sufficient for renewal of the Arizona Department of Health Services license.

**Arizona Department of Education Certification**

Speech-language technicians are limited to working in Arizona public schools and therefore must obtain certification from the Arizona Department of Education. The applicant for this certificate must have a Bachelor’s degree in speech-language pathology or communication sciences and disorders from an accredited institution, 50 hours of university supervised observation hours, 150 hours of clinical experience supervised by a Master’s level Speech-Language Pathologist, and a passing score on the Speech and Language Impaired Special Education portion of the Arizona Educator Proficiency Assessment (AEPA). The applicant must also possess a limited license through the Arizona Department of Health Services to practice.

**Arizona Department of Health Services Licensure**

Arizona statute requires speech-language technicians (SLTs) to hold an Arizona Department of Health Services Speech-Language Pathology limited license to practice in the state. To apply for a limited license in speech-language pathology, the following documentation is required:

1. A copy of a temporary or standard certificate in speech-language therapy issued by the State Board of Education

2. A copy of an employment contract or an employment contract conditioned upon the applicant’s licensure, with a local education agency or state-supported institution that includes:
   a. The applicant’s name and social security number,
   b. The name of the local education agency or state-supported institution,
   c. The classification title of the applicant,
   d. The work dates or projected work dates of the employment contract, and
   e. Signatures of the applicant and the individual authorized by the governing board to represent the local education agency or state-supported institution

State licensed SLTs are NOT eligible to participate in medical billing and Medicaid billing (i.e., in participating school districts).
Speech-Language Pathology Assistant

Description of Position/Duties

Speech-Language Pathology Assistants are NOT autonomous practitioners and must practice under the supervision of a Master’s level, Arizona licensed, Speech-Language Pathologist. They are eligible to work in any clinical setting (hospitals, schools, early intervention, etc.) with proper supervision. Supervision requirements include a minimum of twenty percent direct supervision and ten percent indirect supervision of all of the time that a Speech-Language Pathology assistant is providing services during the first ninety days of the person’s employment and a minimum of ten percent direct supervision and ten percent indirect supervision of all of the time a speech-language pathologist assistant is providing services subsequent to the first ninety days of employment.

Speech-Language Pathology Assistants (SLPAs) perform the following duties:

- Conduct speech and language screenings without interpretation, using screening protocols specified by the supervising speech-language pathologist.
- Provide direct treatment assistance, including feeding for nutritional purposes to patients, clients or students except for patients, clients or students with dysphagia, identified by the supervising speech-language pathologist by following written treatment plans, individualized education programs, individual support plans or protocols developed by the supervising speech-language pathologist.
- Document patient, client or student progress toward meeting established objectives as stated in the treatment plan, individual support plan or individualized education program without interpretation of the findings, and report this information to the supervising speech-language pathologist.
- Assist the speech-language pathologist in the collecting and tallying of data for assessment purposes, without interpretation of the data.
- Act as a second-language interpreter during assessments.
- Assist with informal documentation during an intervention session by collecting and tallying data as directed by the speech-language pathologist, preparing materials and assisting with other clerical duties as specified by the supervising speech-language pathologist.
- Schedule activities and prepare charts, records, graphs or other displays of data.
- Perform checks and maintenance of equipment.
- Participate with the speech-language pathologist in research projects, in-service training and public relations programs.
- Sign and initial treatment notes for review and co-signature by the supervising speech-language pathologist.

Duties outside the scope of the Speech-Language Pathology Assistant include the following:

- Conducting swallowing screening, assessment and intervention protocols, including modified barium swallow studies.
- Administering standardized or non-standardized diagnostic tests, formal or informal evaluations or interpreting test results.
Participating in parent conferences, case conferences or any interdisciplinary team meeting without the presence of the supervising speech-language pathologist.

Writing, developing or modifying a patient's, client's or student's treatment plan, individual support plan or individualized education program in any way.

Providing intervention for patients, clients or students without following the treatment plan, individual support plan or individualized education program prepared by the supervising speech-language pathologist.

Signing any formal documents, including treatment plans, individual support plans, individualized education programs, reimbursement forms or reports.

Selecting patients, clients or students for services.

Discharging patients, clients or students from services.

Unless required by law, disclosing clinical or confidential information orally or in writing to anyone not designated by the speech-language pathologist.

Making a referral for any additional service.

Communicating with the patient, client or student or with family or others regarding any aspect of the patient, client or student status without the specific consent of the supervising speech-language pathologist.

Writing a formal screening, diagnostic, progress or discharge note.

Performing any task without the express knowledge and approval of the supervising speech-language pathologist.

Educational Requirements (i.e., academic and clinical)

SLPAs must complete an approved training program for speech-language pathology assistants or the equivalent from a nationally or regionally accredited college or university that consisted of a minimum of sixty semester credit hours of course work (combined speech-language pathology and general education hours) with the following curriculum content:

- Twenty to forty semester credit hours of general education.
- Twenty to forty semester credit hours of speech-language pathology technical course work.
- A minimum of one hundred hours of clinical interaction that does not include observation, under the supervision of a licensed Master's level Speech-Language Pathologist.

Continuing Education

The Arizona Department of Health Services requires 10 hours of continuing education coursework each year in areas related to clinical services provided by the SLPA. Training must be provided by a licensed Speech-Language Pathologist or Audiologist and address current developments in speech-language pathology or methods and procedures used to screen and treat speech-language pathology disorders.

Arizona Department of Health Services Licensure

Individuals seeking to practice as a Speech-Language Pathology Assistant must be licensed by the Arizona Department of Health Services. To be licensed as a SLPA, an individual must have a
minimum of 60 units of college coursework with at least 20 units of this coursework specific to speech-language pathology. In addition, they must submit signed documentation that they have completed 100 hours of supervised clinical training by a Master’s level Speech-Language Pathologist as well as documentation affirming a Master’s level Speech-Language Pathologist’s willingness to serve as their supervisor in their proposed work setting. Licensure is valid for 1 year and may be renewed if the applicant meets supervision and continuing education requirements.

**Arizona Department of Education Certification**

The Arizona Department of Education does not certify Speech-Language Pathology Assistants. All licensing and enforcement is conducted through the Arizona Department of Health Services.
Definitions

American Speech Language Hearing Association (ASHA): The American Speech-Language-Hearing Association is the professional, scientific, and credentialing association for 145,000 members and affiliates who are speech-language pathologists, audiologists, and speech, language, and hearing scientists in the United States and internationally.

Speech Language Pathologist (SLP): Speech-language pathologists, as defined by ASHA, hold the ASHA Certificate of Clinical Competence in Speech-Language Pathology (CCC-SLP), which requires a master’s, doctoral, or other recognized postbaccalaureate degree. Where applicable, speech-language pathologists hold other required credentials (e.g., state licensure, teaching certification).

Speech and Language Technician (SLT): A person who wishes to be licensed as a speech-language pathologist whose practice is limited to providing services in a school setting. SLT’s must be licensed by the Arizona Department of Health Services (ADHS) and certified by the Arizona Department of Education (ADE). SLT’s are not eligible for ASHA certification.

Speech and Language Pathology Assistant (SLPA): Speech-language pathology assistants are support personnel who, following academic and/or on-the-job training, perform tasks prescribed, directed, and supervised by ASHA-certified speech-language pathologists.

Certificate of Clinical Competence (CCC): The Certificate of Clinical Competence (CCC), a nationally recognized professional credential that represents a level of excellence in the field of Audiology (CCC-A) or Speech-Language Pathology (CCC-SLP).

Council of Academic Accreditation in Audiology and Speech-Language Pathology (CAA): The CAA is the only accrediting agency for audiology and speech-language pathology education programs recognized by the Council for Higher Education Accreditation (CHEA) and the U.S. Department of Education (USDE).

Supervised Practicum: a course of study designed for preparation of student clinicians that involves the supervised practical application of previously studied theory.

Clinical Fellowship Year (CFY): The Clinical Fellowship (CF) is a transition between being a student and being an independent provider of clinical services that involves a mentored professional experience after the completion of academic course work and clinical practicum.

Praxis or ETSNESPA: ETSNESPA is the acronym that refers to the Educational Testing Service National Examination in Speech-Language Pathology and Audiology, the specialty area test of the Praxis II. The Praxis II exam in Speech-Language Pathology is used as a requirement for the ASHA Certificate of Clinical Competence.

Individual Educational Plan (IEP): Each child found eligible for special education has an IEP, which is a document that identifies the services that will be provided, the goals that the services will target, the setting in which the services will occur, and the amount of time the services will be provided.
**Speech Sound Production Disorders:**

Articulation disorder is the atypical production of speech sounds characterized by substitutions, omissions, additions or distortions that may interfere with intelligibility.

Dysarthria is a motor speech disorder. The muscles of the mouth, face, and respiratory system may become weak, move slowly, or not move at all after a stroke or other brain injury. The type and severity of dysarthria depend on which area of the nervous system is affected.

**Fluency Disorders:** Involves an interruption in the flow of speaking characterized by atypical rate, rhythm, and repetitions in sounds, syllables, words, and phrases. This may be accompanied by excessive tension, struggle behavior, and secondary mannerisms.

Stuttering: Fluency disorder characterized by disruptions in the production of speech sounds

Cluttering: syndrome characterized by a speech delivery rate which is either abnormally fast, irregular, or both.

**Voice disorders:** Characterized by the abnormal production and/or absences of vocal quality, pitch, loudness, resonance, and/or duration, which is inappropriate for an individual's age and/or sex.

**Swallowing Instrumentation: Videofluoroscopy, Nasoendoscopy, Modified Barium Swallow**

Videofluoroscopic swallowing study has acquired various names: modified barium swallow (MBS), oropharyngeal motility study (OPMS), cookie swallow, rehabilitation swallow test, video swallow, and videofluorography. The videofluoroscopic swallowing study is a dynamic radiographic study. The examination images oral, pharyngeal, and cervical-esophageal bolus flow during swallowing. Anatomic and/or physiologic abnormalities are identified relative to swallowing.
Contact Information

Arizona Department of Health Services, Office of Special Licensing:

150 N. 18th Avenue
Suite 460
Phoenix, AZ 85007
(602) 364-2079
(602) 364-4769 Fax

http://www.azdhs.gov/licensing/special/index.php#speech-hearing-home

Arizona Department of Education, Certification Unit:

P.O. Box 6490
Phoenix, AZ 85005
(602) 542-4367

http://www.azed.gov/educator-certification/

Arizona Speech-Language-Hearing Association (ArSHA):

P.O. Box 12334
Tempe, AZ 85284
(602) 354-8062
(815) 550-2337 Fax

http://www.arsha.org

American Speech-Language-Hearing Association (ASHA):

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Rockville, MD 20850
(301) 296-5700

http://www.asha.org