

From: [BPL-BoardSupport](#)
To: [MacIntosh, Weston \(LARA\)](#)
Subject: FW: Comments on Speech-Language Pathology General Rules
Date: Tuesday, January 19, 2021 12:31:28 PM
Attachments: [MSHA Response to SLP Rule Changes 2021.pdf](#)

From: Kelli Pierce <kelli@therapyjackson.com>
Sent: Tuesday, January 19, 2021 12:28 PM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Subject: Comments on Speech-Language Pathology General Rules

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Hello,

Attached please find MSHA's comments on SLP General Rules MOAHR #2020-78 LR.

Thank you for your consideration.

Sincerely,

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Kelli Pierce M.A., CCC/SLP
Speech/Language Pathologist
Assistant Director of Clinical Compliance & Development
VP for Advocacy, Michigan Speech-Language-Hearing Association

Comprehensive Speech and Therapy Center, Inc.
Phone: 517-750-4777
Fax: 517-782-4717
www.therapyjackson.com
<http://www.facebook.com/CSTC.Jackson>

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Michigan Speech-Language-Hearing Association

Assistance, Awareness & Advocacy in Communication Sciences & Disorders

To: Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing – Boards & Committees Section
P.O. Box 30670
Lansing, MI 48909-8170
Attention: Policy Analyst
Email: BPL-BoardSupport@michigan.gov

RE: Response to Speech-Language Pathology – General Rules (MOAHR #2020-78 LR)

Date: January 19, 2021

The Michigan Speech-Language-Hearing Association (MSHA) represents speech-language pathologists (SLPs) in the state of Michigan. We are writing in response to general rule changes included in MOAHR #2020-78 LR.

One of the changes proposed includes a change in the educational limited license to a 12 month nonrenewable license. Previously, the educational limited license was issued for two years, with the option to renew two times.

The educational limited license requires 1,260 supervised working hours and is aligned with the American Speech-Language-Hearing Association's (ASHA's) requirements for completion of a clinical fellowship program, a time where recent graduates receive direct and indirect supervision from an experienced and certified SLP. ASHA proposes that this supervision experience be completed in a minimum of 36 weeks working 35 hours per week and cannot exceed 4 years following the beginning of the clinical fellowship experience. Following completion of the 1,260 supervised program, the SLP is able to become fully certified by ASHA and practice independently. This is similar to the State's current educational limited license; upon completion, the SLP is able to apply for a full license and practice and bill independently. While the hours and supervision requirements are similar between ASHA's clinical fellowship program and the educational limited license in the State of Michigan, the time limits differ greatly.

The proposed change to a 12 month, nonrenewable license is untenable for many SLPs across the state. There are many circumstances in which an individual holding an educational limited license may not be able to complete the required 1,260 hours within 12 months. Some examples include an unplanned, extended medical leave from work or lack of full-time employment. Should an SLP with an educational limited license obtain employment in a school setting, there is a significant chance that s/he may not work for the three months over the summer, putting further strain on the supervised clock hour and time sensitive requirements for their license. Part-time employees, working less than 24 hours per week, would not be able to complete 1,260 hours within a 12 month time frame. Additionally, as we have all learned while living and working through a global pandemic, there are many unknown circumstances that can arise, limiting working hours and places of employment, thereby reducing the ability to gain experience and clinical hours toward the 1,260 hour requirements.

Our concern is that recent graduates in the field of speech-language pathology may leave the State of Michigan to complete their clinical fellowship, perhaps never to return. This puts a tremendous strain on the field of speech-language pathology in the State of Michigan, as many employers are already indicating the need for more SLPs and the trajectory for the need for SLPs in a variety of settings is not decreasing. This limitation encourages recent graduates of speech-language pathology programs to look beyond state lines to complete the certification requirements in order to practice at the fullest extent of their license and certification.

We at MSHA are working with our lobbyist to propose legislative changes to MCL 333.17609(4) to extend the current 12 month limit. While we understand that these General Rule changes are being made to align with Public Act 368, we are asking that considerations for temporary renewal of a 12 month educational limited license be made until the time that updates to the Public Act can be enacted.

Thank you in advance for considering our concerns regarding changes to the licensing requirements for educational limited licenses in the State of Michigan.

Sincerely,



Kelli Pierce, M.A., CCC-SLP
Vice-President of Advocacy
Michigan Speech-Language-Hearing Association

kelli@therapyjackson.com



Gregory J. Spray, Ph.D., CCC-SLP
President
Michigan Speech-Language-Hearing Association

spraygre@msu.edu