

Arkansas Board of Examiners for Speech-Language Pathology and Audiology
Proposed Rules - comment summary

Commenter	Comment Number	Comment	Board Response
Anonymous, submitted by Rachel Glade, president of ArkSHA	1	<p>COMMENT: The Medicaid therapy manual and ABESPA rules and regs differ with ABESPA being more stringent. I have no problems with the more stringent regulations, however, there is one difference (below) that we may be able to come together on.</p> <p>Medicaid 203.000 B: When therapy services are provided by a licensed therapy assistant or speech-language pathology assistant who is supervised by a licensed therapist or speech-language pathologist, the supervising therapist or speech-language pathologist must observe a therapy session with a child and review the treatment plan and progress notes at a minimum of every 30 calendar days.</p>	<p>The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.</p>
	2	<p>COMMENT: Also, 13.12 D could be updated by eliminating "pager" and maybe adding online platforms.</p> <p>RULE PROVISION [p. 34 of markup]:</p> <p>D. A supervising speech-language pathologist must be able to be reached by personal contact, phone, pager, or other immediate means at all times when direct patient/client care is being rendered.</p>	<p>The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.</p>

Madi Littlefield	3	<p>COMMENT: I am a second year SLP graduate student graduating in May. The removal of the 30 day grace period is concerning to me as someone who is hoping to start my clinical fellowship as soon as possible. As a soon to be SLP-CF, I will be unable to submit my provisional license application until I have a job with a supervisor, due to needing to fill out the CF plan and have my supervisor sign. If the 30 day grace period is removed, I would be unable to start practicing until I received my provisional license back instead of being able to work during the process.</p> <p>While I do support removing the 30 day grace period to ensure that practicing SLP-CCCs do not practice without a license, I feel as though there should be an exception for SLP-CFs who are obtaining a provisional license for the first time.</p> <p>RULE PROVISION: See Section 2.5 on p. 4 of the markup.</p>	<p>Due to the COVID-19 crisis, the Board believes that now is not the time to implement a significant change in the licensure process. Therefore, the board will retain the 30-day grace period.</p> <p>The Board will also add back in the following phrase, which was accidentally omitted from Section 2.11: Application must be made within thirty days of beginning the professional experience.</p>
Natalie Benafield	4	<p>COMMENT: I am the graduate program coordinator at UCA for the Speech Pathology Master's Program. I'm seeking clarification on Section 2.5. I am unsure if the deletion of the "30 day grace period" will affect students graduating with their master's degrees. For example, we have told our graduates that they must apply for their PROVISIONAL LICENSE within 30 days of beginning their CFY. So do they now need to apply BEFORE they graduate? The section on Provisional Licensure does not specify when they should apply for their provisional license.</p> <p>RULE PROVISION: See Section 2.5 on p. 4 of the markup.</p>	<p>Due to the COVID-19 crisis, the Board believes that now is not the time to implement a significant change in the licensure process. Therefore, the board will retain the 30-day grace period.</p> <p>The Board will also add back in the following phrase, which was accidentally omitted from Section 2.11: Application must be made within thirty days of beginning the professional experience.</p>

Shelly Wier, ADE	5	<p>COMMENT: Did you know this section (below) is being removed from the ABESPA rules? What's the status of the annual interagency agreement with ABESPA re: use of SLPAs?</p> <p>RULE PROVISION: [p. 28 of markup] 13.3 This document also provides for the Arkansas Department of Education (ADE), in accordance with its statutory, general supervision authority over public agencies which provide educational services to children with disabilities birth to twenty-one years of age, in conjunction with the Department of Human Services (DHS), Developmental Disabilities Services (DDS), to regulate speech-language pathology assistants and aides performing duties in such programs. ABESPA approved the 1999 ADE guidelines for registration, training, scope of responsibilities, supervision, and review of these individuals. Any proposed revisions to the guidelines will be submitted to ABESPA for approval. The ADE will provide ABESPA, upon request, any reports and/or records with regard to these individuals in the performance of their duties as may be necessary to ensure compliance with established standards.</p> <p>ADDITIONAL NOTE FROM STAFF: Board Chair Elizabeth Williams called Ms. Wier and explained that ABESPA's rules cannot bind ADE and that the Board is not making any substantive changes to the provisions re ADE and SLPA's.</p>	<p>The Board voted not to make this change at this time. The interagency agreement is no longer necessary since Sharon Ross retired and the board now has a contract with another person who serves as SLPA Coordinator.</p>
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	6	<p>COMMENT: This (below) isn't being edited. I just don't understand it. Does this just mean ABESPA can revoke ADE's role in approving and monitoring SLPAs in the schools when/if it wants to?</p> <p>RULE PROVISION: [p. 28 of markup]: 13.6 For all purposes, ABESPA retains regulatory authority for speech-language pathology services, unless specifically exempted by statute. The Board may at any time, for good cause, revoke all exceptions and exemptions, granted in these rules; and at such time may require registration of all SLP-Assistants and SLP-Aides through ABESPA.</p> <p>ADDITIONAL NOTE FROM STAFF: Board Chair Elizabeth Williams called Ms. Wier and explained that ABESPA's rules cannot bind ADE and that the Board is not making any substantive changes to the provisions re ADE and SLPA's.</p>	<p>No. ABESPA has no authority over ADE/DESE. Furthermore, there is a specific exemption in Ark. Code Ann. § 17-100-104: Nothing in this chapter shall be construed as preventing or restricting: ... (4)(A) A person from performing speech-language pathology or audiology services solely within the confines or under the jurisdiction of a public school system if that person holds a valid and current certificate as a speech therapist or speech-language pathologist issued by the Division of Elementary and Secondary Education.</p>
	7	<p>COMMENT: Why only "since January 1, 1993?"</p> <p>RULE PROVISION: [p. 5 of markup] 2.8 The Board will accept proof of ASHA Certificate of Clinical Competence granted since January 1, 1993, as evidence of the required degree (Section 2.7).</p>	<p>This date was updated in 1993 - the previous date was January 1, 1971.</p>

	8	<p>COMMENT: I understand the need to expedite the licensure process, but this dilutes the Board's responsibilities. The Director isn't an SLP or audiologist.</p> <p>RULE PROVISION: [p. 8 of markup] 3.2 A quorum of the Board as required by Ark. Code Ann. §17-100-203 shall deliberate on each application for licensure. Action on the application shall require a majority vote of the members present. To expedite the licensure process, the Board delegates to its Director the authority to issue licenses to applicants who meet the requirements of the Board's statutes and rules. When necessary, the Director may refer certain applications to the Board for decision.</p>	<p>The Board does not agree with the commenter's opinion. The Board believes that licenses should be issued as soon as possible without applicants having to wait on a board meeting. Board members are available to answer questions and for clarification if necessary. Furthermore, most board directors are not licensees of the boards they work for.</p>
	9	<p>COMMENT: Shouldn't "speech-language pathology assistant" be added to 7.3 as well?</p> <p>RULE PROVISION: [p. 10 of markup] 7.3 Charges against a licensed speech-language pathologist or audiologist shall be in the form of a written statement describing the specific violations of ethical practice, or of the provisions of the Act, or of these Rules and Regulations.</p>	<p>The board agrees and will add "speech-language pathology assistant."</p>

	10	<p>COMMENTS: I thought "aides" were under AR Dept of Ed's oversight... nonexistent to ABESPA, non-licensed. Also, "support personnel" represents both aides and assistants. Redundant?</p> <p>RULE PROVISION: [p. 12 of markup, under 8.1 Principle of Ethics I.]</p> <p>D. Individuals shall not misrepresent the credentials of <u>aides</u>, assistants, technicians, or support personnel, <u>students, research interns, Clinical Fellows, or any others under their supervision</u>, and <u>they</u> shall inform those they serve professionally of the name, role, and professional credentials of persons providing services.</p>	<p>The language is being updated to match ASHA's Rules of Ethics. Under Ark. Code Ann. 17-100-202, ABESPA is required to "promulgate rules regarding the use of speech-language pathology support personnel by practitioners of speech-language pathology."</p> <p>Th Board believes it has the statutory authority to promulgate this rule and is comfortable with the language as presented.</p>
	11	<p>COMMENT: Same as previous comment.</p> <p>RULE PROVISION: [p. 12 of markup, under 8.1 Principle of Ethics I.]</p> <p><u>E. Individuals who hold an Arkansas license may delegate tasks related to the provision of clinical services to aides, assistants, technicians, support personnel, or any other persons only if those persons are adequately prepared and are appropriately supervised. The responsibility for the welfare of those being served remains with the licensed individual.</u></p>	<p>The language is being updated to match ASHA's Rules of Ethics. Under Ark. Code Ann. 17-100-202, ABESPA is required to "promulgate rules regarding the use of speech-language pathology support personnel by practitioners of speech-language pathology."</p> <p>Th Board believes it has the statutory authority to promulgate this rule and is comfortable with the language as presented.</p>

	12	<p>COMMENT: Same as previous comment.</p> <p>RULE PROVISION: [p. 12 of markup, under 8.1 Principle of Ethics I.] <u>F. Individuals who hold an Arkansas license shall not delegate tasks that require the unique skills, knowledge, judgment, or credentials that are within the scope of their profession to aides, assistants, technicians, support personnel, or any nonprofessionals over whom they have supervisory responsibility.</u></p>	<p>The language is being updated to match ASHA's Rules of Ethics. Under Ark. Code Ann. 17-100-202, ABESPA is required to "promulgate rules regarding the use of speech-language pathology support personnel by practitioners of speech-language pathology." Th Board believes it has the statutory authority to promulgate this rule and is comfortable with the language as presented.</p>
	13	<p>COMMENT: If "aides" is added previously, shouldn't it be added here as well?</p> <p>RULE PROVISION: [p. 17 of markup, under 8.1 Principle of Ethics IV.] <u>F.G. Individuals shall not discriminate in their relationship with colleagues, assistants, students, support personnel, and members of allied other professions and disciplines on the basis of race, or ethnicity, sex, gender/identity, gender/expression, age, religion, national origin, sexual orientation, culture, language, dialect, socioeconomic status, or disability.</u></p>	<p>The language is being updated to match ASHA's Rules of Ethics and the Board is comfortable with the language as written.</p>

	14	<p>COMMENT: Same as previous comment.</p> <p>RULE PROVISION: [p. 17 of markup, under 8.4 Principle of Ethics IV.] <u>M. Individuals shall not engage in sexual activities with individuals (other than a spouse or other individual with whom a prior consensual relationship exists) over whom they exercise professional authority or power, including persons receiving services, assistants, students, or research participants.</u></p>	<p>The language is being updated to match ASHA's Rules of Ethics and the Board is comfortable with the language as written.</p>
	15	<p>COMMENT: Determining the type of service delivery most appropriate for clients is part of Content Area I (g): "Principles and procedures in habilitation and rehabilitation of communication disorders...." and should be added/included as such. Expansion of service delivery options in recent years has created a need for professional development regarding their selection and implementation.</p> <p>RULE PROVISION: [p. 19 of markup] CONTENT AREA II: (Must relate to the practice of Speech-Language Pathology and/or Audiology) ... (b) service <u>Service</u> delivery such as telepractice, group versus individual services, use of support staff, service to underserved populations;</p>	<p>The Board is comfortable with service delivery remaining in Content Area II for now but is open to discussions on future changes.</p>
	16	<p>COMMENT: insert "randomly"</p> <p>RULE PROVISION: [p. 19 of markup] 9.3 Annually, the Board will select licensees for audit.</p>	<p>The Board may choose to audit licensees both randomly and if a licensee's CPE report is suspect.</p>

	17	<p>COMMENTS: Shouldn't A. read "live" webinars since pre-recorded sessions are considered self-study (B)?</p> <p>RULE PROVISION: [p. 20 of markup] 9.6 The Board will accept, but not be limited to the following activities, that fall within Content Areas I and II: A. Attending scientific or educational lectures, workshops, teleseminars <u>webinars</u>, seminars, college courses, interactive videos, or online courses. B. Independent study of journals, books, videotapes, audiotapes, or online courses.</p>	The Board is comfortable with the language as it is. The distinction is irrelevant since all methods described are acceptable.
	18	<p>COMMENTS: "...stated for assistants [add] providing services in person/on-site."</p> <p>RULE PROVISION: [p. 27 of markup] B. Supervision rules shall remain the same as those stated for assistants.</p>	The Board has decided to separately promulgate substantive changes to Section 12. Telepractice. This comment will be considered by the Board at that time.
	19	<p>COMMENTS: How does "in person" work for out-of-state distant providers? Most are providing evaluations via telepractice.</p> <p>RULE PROVISION: [p. 27 of markup] C. For purposes of this rule, a professional relationship, at a <u>minimum requires that:</u> <u>i. (a) The provider performs an "in person" evaluation of the patient adequate to establish a recommended treatment, OR</u></p>	The Board has decided to separately promulgate substantive changes to Section 12. Telepractice. This comment will be considered by the Board at that time.

	20	<p>COMMENTS: This conflicts with 12.4.</p> <p>RULE PROVISION: [p. 28 of markup]</p> <p>D. DIRECT SUPERVISION - Direct supervision means on-site, in-view observation and guidance by a speech-language pathologist while an assigned clinical activity is performed by speech language pathology assistant or speech-language pathology aide. [Emphasis added in comment.]</p> <p>12.4 Supervision</p> <p>A. Supervision of assistants may be done through telepractice as long as client confidentiality can be maintained.</p> <p>B. Supervision rules shall remain the same as those stated for assistants.</p>	<p>The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.</p>
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	21	<p>COMMENT: You might want to add "and/or education service cooperatives" after "public school systems" since a lot of 3-5 services are provided via the co-ops and fall under DESE.</p> <p>RULE PROVISION: [p. 29 of markup] <u>A. Individuals desiring to register as a speech-language pathology assistant under Act 826 of 1995, § 2, codified at Ark. Code Ann. § 17-100-202(b)(2) must submit an application for registration to ABESPA, except that, individuals who desire to perform the duties of a speech-language pathology assistant in Arkansas public school systems will register with the Division of Elementary and Secondary Education-ADE who desire to perform the duties of a speech-language pathology assistant in a public agency, or a community program licensed by DHS, DDS, which provides educational services to children with disabilities birth to twenty-one years of age under the general supervision of the ADE.</u> Further, Section 13.9, subsections B, C, and D shall not apply to those individuals. Therefore, if an assistant is working in a public agency school only, the assistant will register with the <u>Division of Elementary and Secondary Education</u>ADE.</p>	Ark. Code Ann. 17-100-104(4)(A) only exempts from licensure individuals who work in a public school system. The requested language would have to be added to the statute before it could be added to the rule.
	22	<p>COMMENT: Same as previous comment.</p> <p>RULE PROVISION: [p. 29 of markup] B. If an assistant is working in a public agency school and another agency, the assistant will register with <u>the Division of Elementary and Secondary Education and ABESPA.</u> In this instance, ABESPA will collaborate with ADE to determine approval.</p>	Ark. Code Ann. 17-100-104(4)(A) only exempts from licensure individuals who work in a public school system. The requested language would have to be added to the statute before it could be added to the rule.

	23	<p>COMMENT: FYI: Currently only applicants from out-of-state SLP Assistant programs typically have acquired clinical practicum hours. Even AR Bachelor's programs in SLP (except maybe Harding starting this Fall) do not require clinical practicum hours so no AR Bachelor's grads would be qualified to apply as an assistant, which defeats the purpose of allowing their use in AR to begin with. SLP students in AR don't acquire clinical practicum hours until grad school.</p> <p>RULE PROVISION: [p. 29 of markup] (c) Documentation of thirty (30) clinical practicum hours as a SLP-Assistant trainee signed by the Chair of the speech-language pathology department at the educational institution that provided this training. This requirement is applicable only to individuals without a bachelor's degree in speech-language pathology.</p>	<p>The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.</p>
	24	<p>COMMENT: Number of clients to be served may be more valuable than number of practice sites.</p> <p>RULE PROVISION: [p. 30 of markup] (d) Aa list of facilities in which the SLP-Assistant will be utilized. The location of work settings must be kept current. Any change must be reported in writing to ABESPA within twenty-one (21) days. Based on information received, the Board may limit the number of practice sites.</p>	<p>The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.</p>

	25	<p>COMMENT: 1) Again, an AR bachelor's degree in SLP/CSD does not include any clinical practicum hours. 2) Harding is working on it (and maybe SAU), but otherwise there are no accredited institutions for Associate's degrees for SLP Assistants in AR right now. My suggestion: Remove the required clinical practicum hours. OJT with a supervising SLP is just as valuable and more specific to duties to be assigned.</p> <p>RULE PROVISION: [p. 30 of markup] A. A speech-language pathology assistant must: ... 2. Complete a speech-language pathology assistant training program culminating in an Associate Degree from an institution accredited by the Arkansas Department Department <u>Division</u> of Higher Education. Programs must meet the specified curriculum content and fieldwork experience listed below. Applicants from out of state will be reviewed on a case-by-case basis to ensure equivalency.</p>	The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.
	26	<p>COMMENT: ASHA is launching SLPA certification this Fall. https://www.ashaassistants.org/pathways-speech-language-pathology-assistant</p> <p>RULE PROVISION: [p. 30 of markup] The curriculum must be consistent with the ASHA-approved Criteria for the Registration of Speech-Language Pathology Assistants (Section III-A)</p>	This comment does not seem to require a response, but the Board is aware.

	27	<p>COMMENT: See previous comments.</p> <p>RULE PROVISION: [p. 31 of markup] *Fieldwork Experience The minimum of 100 hours of fieldwork experience must provide the student with opportunities for carrying out speech-language pathology assistant responsibilities. This training must be supervised by a speech-language pathologist who holds a current and valid license from ABESPA or the ASHA Certificate of Clinical Competence (CCC) in Speech-Language Pathology. These experiences are not intended to develop independent practice.</p>	<p>The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.</p>
	28	<p>COMMENT: See previous comment re: moving service delivery models to Content Area I.</p> <p>RULE PROVISION: [p. 32 of markup] Content Area II for Assistants ... (b) Service delivery models</p>	<p>The Board is comfortable with service delivery remaining in Content Area II for now but is open to discussions on future changes.</p>
<p>Rachel Glade, Ph.D., CCC-SLP, LSLS Cert. AVT President of ArkSHA</p>	29	<p>COMMENT: One area of concern for us is that the telepractice rules may be too restrictive in requiring an established professional relationship and not providing some leeway for out-of-state practitioners, especially in emergency situations like COVID. Is there a way to consider addressing this concern?</p> <p>ADDITIONAL NOTE FROM STAFF: Board Chair Elizabeth Williams called Ms. Glade for clarification on her comment. Ms. Glade said she doesn't want to limit the telehealth provider. She also said she may supplement her comment.</p>	<p>The Board has decided to separately promulgate changes to Section 12. Telepractice. This comment will be considered by the Board at that time.</p>

	30	COMMENT: What will be needed to apply for a provisional license? There may be delays in graduation and will likely be delays for Praxis testing (especially for the 2018-2020 cohort that is graduating this year). We noticed there is a plan to remove the 30-day grace period for licensure. What does this mean for 2020 graduates?	<p>Due to the COVID-19 crisis, the Board believes that now is not the time to implement a significant change in the licensure process. Therefore, the board will retain the 30-day grace period.</p> <p>The Board will also add back in the following phrase, which was accidentally omitted from Section 2.11: Application must be made within thirty days of beginning the professional experience.</p>
Donna Smiley Ark. Children's Hospital	31	COMMENT: I have read through the proposed revisions and do not see any big issues. I do think that in section 12.1 with the deletion of C, that the following items will have to be re-lettered. BUT otherwise, I am comfortable with the revisions. Thanks to everyone who contributed to this much needed update of our rules.	The Board decided to separately promulgate substantive changes to Section 12 and is not deleting subsection 12.1.C at this time, but the Board appreciates your thanks.
Gretchen Hicks, Board SLPA Coordinator, and other SLP's at Easter Seals	32	COMMENT re Section 1.9: Should leave something about having access to amendments - or is this only talking about applicants and is access to amendments for licensed folks?	Amendments are included in the Board's statutes and rules, and everyone will have access.
	33	COMMENT re Section 2.5: 2.5 Delete on of the "Practice" s	The Board voted not to proceed with the change in 2.5 that lead to the typo referenced in the comment.
	34	COMMENT re Section 7: This section is very similar with few changes to original	No response required.

	35	COMMENT re Section 8.1.C [this provision has been correctly re-numbered as 8.1.C.]: How are these things different? “Sex” “sexual orientation” “gender” “identity/gender expression”	These terms are not defined in the proposed rule. The language is being updated to match ASHA's Rules of Ethics and will be given their commonly understood meaning.
	36	COMMENT re Section 8.A.1.G [this provision has been correctly re-numbered as 8.1.G.]: How does the SLP ensure these training/skills??	The language is being updated to match ASHA's Rules of Ethics. An SLP must use her training, experience, and professional judgment.
	37	COMMENT re Section 8.A.1.L [this provision has been correctly re-numbered as 8.1.M.]: How does one determine if a clinical judgement is evidence-based? Wording might need to be adjusted on this? clinical judgment???	The language is being adopted to match ASHA's Rules of Ethics An SLP must use her training, experience, and professional judgment.
	38	COMMENT re Sections 8.A.1.N. and O. [these provisions have been correctly re-numbered as 8.1.O. and 8.1.P.]: How are the diff [sic]?	The Board assumes the commenter is asking how these two provisions differ from each other. The language is being adopted to match ASHA's Rules of Ethics 8.A.1.N. protects the confidentiality of records of the activities specified, while 8.A.1.O. protects personal information.

	39	<p>COMMENT re Section 8.A.1.N. [this provision has been correctly re-numbered as 8.1.O.]:</p> <p>"records shall be allowed only when doing so is necessary to protect the welfare of the person or of the community, is legally authorized, or is otherwise required by law."-----maybe clarify for - IEP teams or does IDEA law cover this.</p>	<p>The language is being updated to match ASHA's Rules of Ethics .</p> <p>The Board considered this comment and made no change.</p>
	40	<p>COMMENT re Section 8.A.1.S. [this provision has been correctly re-numbered as 8.1.T.]:</p> <p>"Individuals shall provide reasonable notice and information about alternatives for obtaining care in the event that they can no longer provide professional services." Can you clarify "reasonable notice"? Ex. SLP in another state sent to ethics board due to only giving 1 months notice? 1 month seems reasonable but not how it was interpreted by person turning in.</p>	<p>The language is being adopted to match ASHA's Rules of Ethics.</p> <p>The licensee must use her best professional judgment to decide what constitutes "reasonable notice" based on the situation presented.</p>

	41	<p>COMMENT re Section 8.2.Q. [this provision has been correctly re-numbered as 8.2.A.]:</p> <p>"Individuals who hold an Arkansas license shall engage in only those aspects of the professions that are within the scope of their professional practice and competency" What defines competency for different areas in scope? For example. SLPs say they cannot work with aug [sic] communication because they aren't competent but they could and should be able to be competent bc it is under scope of practice and mandated in public school where SLP working. Some SLPs use competency for to excuse not providing service for difficult kids.</p>	<p>As noted in Board Rule 1, section 11. Scope of Practice, there is "a broad range of services offered within" the scope of practice of speech-language pathology and of audiology. Section 11 further notes that, "[i]t is recognized, however, that levels of experience, skill and proficiency with respect to the activities identified within the scope of practice will vary among the individual providers." ABESPA expects each licensee to use her professional judgment, experience, and training to determine and accurately represent her competency.</p>
	42	<p>COMMENT re Section 8.A.4.K. [this provision has been correctly re-numbered as 8.4.K.]:</p> <p>CAN YOU MANDATE THIS?</p>	Yes
	43	<p>COMMENT re Section 8:</p> <p>Ethics sections are very long, wordy, and in some cases redundant. Did these statements come from ASHA? If not, where? May need to be looked over and vetted by several other professionals.</p>	<p>The language is being updated to match ASHA's Rules of Ethics. The Board considered this comment and made no change.</p>

	44	COMMENT re Section 12: Commenters provided six comments regarding the proposed changes on section 12. Telepractice.	The Board has decided to separately promulgate changes to Section 12. Telepractice. These comments will be considered by the Board at that time.
Gretchen Hicks, Board SLPA Coordinator	45	COMMENTS re Section 13: Commenter suggested extensive revisions to Section 13. Rules Governing Registration of Speech-Language Pathology Assistants.	The Board Chair will appoint a committee to study SLPA registration and standards and to make recommendations to the Board. This comment will be submitted to the committee for consideration.
Rachel Glade, Ph.D., CCC-SLP, LSLS Cert. AVT President of ArkSHA	46	COMMENTS re Section 12. Commenter updated previous comments to request additional changes to Section 12. Telepractice.	The Board has decided to separately promulgate changes to Section 12. Telepractice. These comments will be considered by the Board at that time.
Emily Earnest, MA, CCC-A Audiologist President Elect	47	COMMENT: Commenter submitted a letter of support for the licensure or registration of Audiology Assistants in the state of Arkansas	The Board does not have the statutory authority to regulate Audiology Assistants.
Gretchen Hicks, Board SLPA Coordinator, and other SLP's at Easter Seals	48	COMMENT: [re 8.1.E] responsibility for the welfare of those being served remains with the licensed individual. WOW Add or address this elsewhere only if personnel are adequately prepared/trained and are appropriately supervised	The Board does not understand this comment.