

Sara Farris

Sent: Wednesday, January 26, 2022 9:08 AM
Subject: RE: Comments for Promulgation

From: Gretchen Hicks <Gretchen.Hicks@arkansas.gov>
Sent: Monday, January 3, 2022 1:19 PM
To: ABESPA <ABESPA@arkansas.gov>
Subject: Comments for Promulgation

GREEN BOLD ITALICS IS MY COMMENT
RED text with yellow highlight is additions by me
Highlighted strikethroughs are by me

Page 28, Section 12.4 I think this should remain because telesupervision has been shown to be successful and reliable.

Section 13

**** Be consistent with ADE vs DESE. Current language used is Division of Elementary and Secondary Education (DESE) according to Jeff Adams and Aleecia Starkey.**

13.1 add "and supervision"

13.1 The purpose of this document rule is to set minimum qualifications for the registration **and supervision** of speech-language pathology assistants (SLP-A's) by the Arkansas Board of Examiners in Speech Language Pathology and Audiology (ABESPA) as specified in Ark. Code Ann. §17-100-103 to - 104. ~~Rules for their registration and supervision are also established.~~

13.3 correct ADE vs DESE

I think that the highlighted sentence below needs to be kept in light of changes to Medicaid online provider verification requiring practitioners to register through ABESPA and ADE

13.3 This document rule also provides for the Arkansas Department of Education (ADE) **Division of Elementary and Secondary Education (DESE)**, 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 DESE 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.~~

13.8 DEFINITIONS

13.8 D. DIRECT SUPERVISION – **this not the definition that was on committee working document. The working document included telesupervision. I do not have that with me right now but can send it later.**

13.9 REGISTRATION OF SPEECH LANGUAGE PATHOLOGY ASSISTANTS

A. Correct ADE vs DESE

B. 1. Change SLP-Assistant to SLP-A

This application must be approved before employment of the SLP-Assistant can begin. At no time may an SLP-Assistant work without both a current approved registration and approved supervisor.

B.3 Add supervisor after SLP

B. 3. The prospective SLP **supervisor** and the prospective SLP-A must attend an initial training session prior to registration approval.

C.(c)A **change SLP Assistant to SLP-A**

(d)(c) aA statement that the applicant for SLP-~~Assistant~~ and supervising speech-language pathologist have read Ark. Code Ann. §17-100-103 to -104 and the Board rules, and that they agree to abide by them.

C.2. **There is currently not a fee for SLP-As. In addition the working in Section 4.1 includes "Licensure" which is confusing because SLP-As get a "registration". Either leave it out or add registration.**

C. (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.

13.10 REQUIREMENTS FOR A SPEECH-LANGUAGE PATHOLOGY ASSISTANT

Strike the first A

Strike "degree" after program

A. An speech-language pathology assistant SLP-**A** ~~must~~ shall:

1. Complete a bachelor's degree in speech-language pathology communication sciences and disorders from a regionally or nationally accredited institution and 25 hours of observation, which is described in Section 13.10.B.1.b.vi.; OR 2. Complete an speech-language pathology assistant SLP-A training program **degree** (two year minimum), which meets the requirements described in Section 13.10.B., from a regionally or nationally accredited institution (e.g., an culminating in an Associate's Ddegree from a community college, a technical training program, a certificate program, or a bachelor's degree) and 100 hours of fieldwork; an institution accredited by the Arkansas Division 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. OR

This is under the section Technical Knowledge for a SLP-A Training program. Should this be a section of it's own. The observation is required for BS degree while field work is required for SLP A training program.

It could go under 13.10.A.1.i after the info on 25 hours of observation.

⇒vi. oObservation. Observation experiences include direct, on-site observation of an ASHA-certified speech-language pathologist. Additional observation experiences may include pre-approved (by the supervising speech-language pathologist) on-site or video observation of an ASHA-certified speech-language pathologist.

13.12 SUPERVISION GUIDELINES FOR A SPEECH-LANGUAGE PATHOLOGIST ASSISTANT

This is not what committee landed on. Even with the changes I have below, I don't think it reflects what the committee intended.

13.12 SUPERVISION GUIDELINES FOR A SPEECH-LANGUAGE PATHOLOGY ASSISTANT

A. A total of at least 30% direct and indirect supervision is required and must be documented for the first ninety (90) workdays. (For a 40 hours **work week** **of direct client contact**, this would be 12 hours for both direct and indirect supervision.) **During the first 90 workdays**, documented direct supervision of patient/client care shall be required no less than 20% of the actual patient/client contact time weekly for each ~~speechlanguage pathology assistant~~ **SLP-A**. During each week, data on every patient/client seen by the speech-language pathology assistant must be reviewed by the supervisor. In addition, the 20% direct supervision must be scheduled so that all patients/clients seen by the assistant are directly supervised in a timely manner. Supervision days and time of day (morning/afternoon) ~~must~~ **may** be alternated to ensure that all patients/clients receive direct contact with the speech language pathologist at least once every two (2) weeks. Information obtained during direct supervision must include data relative to (a) agreement (reliability) between the assistant and the supervisor on correct/incorrect recording of target behavior, (b) accuracy in

implementation of screening and treatment procedures, (c) accuracy in recording data, and (d) ability to interact effectively with the patient/client.

After the first 90 workdays, The amount of supervision can be adjusted if the supervising SLP determines the SLPA has met appropriate competencies and skill levels with a variety of communication and related disorders.

Minimum ongoing supervision must always include documentation of direct supervision provided by the SLP to each student, patient, or client at least every 30 calendar days.

A minimum of 1 hour of direct supervision weekly and as much indirect supervision as needed to facilitate the delivery of quality services must be maintained.

Documentation of all supervisory activities, both direct and indirect, must be accurately recorded.

Further, 100% direct supervision of SLPAs for medically fragile students, patients, or clients is required.

This section had changes but I was not able to fix it without rewriting entire paragraph.

B. Indirect supervision is required no less than 10% of the actual patient/client contact time and may include demonstration, record review, review and evaluation of audio or videotaped sessions, interactive television, and/or supervisory conferences that may be conducted by telephone. Treatment data must be reviewed at least weekly or every five (5) sessions for each case. The speech-language pathologist will review each plan of care as needed for timely implementation of modifications.

B. Indirect supervision does not require the SLP to be physically present or available via telecommunication in real time while the SLPA is providing services. Indirect supervisory activities may include demonstration tapes, record review, review and evaluation of audio- or videotaped sessions, and/or supervisory conferences that may be conducted by telephone and/or live, secure webcam via the Internet. The SLP will review each treatment plan as needed for timely implementation of modifications.

C. During the initial 90 day period, the speech-language pathologist supervisor must have direct contact with each patient/client at least once every two (2) weeks. After the initial ninety (90) day work period, the amount of supervision may be adjusted depending on the competency of the assistant, the needs of the patients/clients served, and the nature of the assigned tasks. The minimum is 20% documented supervision, with no less than 10% being direct supervision. (For a 40-hour work week, this is 8 hours of supervision, at least 4 of which is direct supervision.) Supervision days and time of day (morning/afternoon) must be alternated to ensure that all patients/clients receive direct contact with the speech-language pathologist at least once every two (2) weeks.

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. If, for any reason (i.e., extended leave, illness, change of jobs), the supervisor is no longer available to provide the level of supervision stipulated, the speech-language pathology assistant SLP-A may not perform direct patient/client care until a qualified and licensed speech language pathologist has been designated as the speech-language pathology assistant SLP-A's supervisor and ABESPA has advised approval of the change.

E. Whenever the SLP-Assistant's performance is judged by the supervising speech-language pathologist to be unsatisfactory over two (2) consecutive observations, the SLP-Assistant shall be retrained in the necessary skills and direct observations shall be increased to 50% of all clinical sessions until the SLP-Assistant's performance is judged to be satisfactory, through written documentation, over two (2) consecutive observations.

*****Check the rest of the document for SLP-A vs speech-pathology assistant. It was not changed throughout the rest of the document and I didn't have time to go through each one. Just be consistent.*****

Thanks for all you do!!

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