

Board of Examiners for Speech-Language Pathology and Audiology (BSPA) Rule Making November 7, 2025

Rule Review:

1. While the Board regularly considers rule changes to better protect the public or increase administrative efficiencies, it is also subject to the statute ORS 183.405, which requires periodic review of rules previously passed. The agency's rules regarding speech-language pathology assistant (SLPA) qualifications were last updated in 2020 making 2025 our target date for review.
2. There have been several questions regarding the academic requirements for SLPAs. Board has begun to meet with stakeholders, including Ashley Northam, CCC-SLP, Director of the SLPA program at Chemeketa Community College. The draft rule language removes outdated references to pre-2021 rules. Another change allows for a minor in communication sciences and disorders as long as the academic program has a minimum number of credits in communication sciences and disorders. The board may also wish to consider if it should retain a requirement in English competency required for applicants whose education was completed in another language.
3. Due to recent policies at the federal level and comments received from licensees and the Oregon Speech-Language Pathology and Audiology Association (OSHA) leadership, the Board is also reviewing the rules regarding Conditional SLP licenses and determining whether that section of the rules is still necessary to achieve the mission of the agency which operates to protect Oregonians.

Currently, recent graduates must obtain a Conditional SLP license and secure a clinical experience site and supervisor to complete a total of 1,260 hours of clinical experience and then upgrade to the full SLP license. Comments from some SLP supervisors have indicated a less formal relationship than the rules currently require. For example, the rules state the supervisor will "manage and direct the duties of ... (the C-SLP)" & "shall keep records of the tasks performed by the conditional licensee and whether the work is performed competently." Board staff have had difficulty in interpreting how this would be documented and verified, and what responsibilities are required of the SLP supervisor if the assignment of duties and documentation of performance are done by administration in the schools, hospital, or clinics that they work in. There is often confusion about the application of the rule "cannot practice independently" in the time period between completing the clinical experience and when the license is upgraded. Some Conditional SLPs apply to upgrade late due to the timing of the experience and are subject to a late fee.

Conditional SLPs have their master's degree which includes hundreds of hours of clinical experience as part of the program. This change would allow full licensure in Oregon by meeting the academic requirements and achieving a passing praxis score. Any "clinical fellowship" relationship in order to earn additional credentials offered by the national professional association (ASHA) would be something voluntary between the SLP and ASHA and not the Oregon Board. This would eliminate the need for licensees to track their clinical fellowship with the board and apply for an upgrade to regular licensure, as they would be fully licensed upon graduation and no additional clinical fellowship would be required. This would lower administrative costs and streamline the licensing process and since the regular license is the same as the cost of the Conditional SLP license plus the upgrade fee, there would be no loss of licensing revenue. This change would also remove barriers to licensure and dramatically increase the pool of SLPs available to serve Oregonians through private clinics, and public schools. These SLPs would not have to wait a year before they could obtain their NPI numbers to bill insurance as full providers (currently their visits must be billed under the supervisor's NPI number, and even that was recently debated by CMS and ASHA).

Staff-Proposed Rule Change(Additions in bold, deletions strike through):

1. ORS 183.405:

"(1) Not later than five years after adopting a rule, an agency shall review the rule for the purpose of determining:

- (a)Whether the rule has had the intended effect;
- (b)Whether the anticipated fiscal impact of the rule was underestimated or overestimated;
- (c)Whether subsequent changes in the law require that the rule be repealed or amended;
- (d)Whether there is continued need for the rule; and
- (e)What impacts the rule has on small businesses."

Rule change from 2020:

"Applicants must submit all of the following to be eligible for certification.

- (1)(a) If applying on or before August 31, 2021, Official transcripts showing 45 quarter hours or 30 semester hours of speech-language pathology technical course work; and Official transcripts showing 45 quarter hours or 30 semester hours of general education credit, or,**
- (b) If applying after September 1, 2021, official transcripts showing successful conferral of a degree from an Approved Training Program as defined in 335-095-0010(1)."**

2. Division 95 SLPA Rules:

OAR 335-095-0010

Definitions

(1) Approved Training Program: A post secondary training program that has approval by the Oregon Board of Examiners for Speech-Language Pathology & Audiology to offer specific coursework and practica leading to licensure as a speech-language pathology assistant. One of the following degrees or certificates from a regionally-accredited program:

- (a) Associate's degree in speech-language pathology assisting or
- (b) Bachelor's degree in communication sciences and disorders or
- (c) Post baccalaureate certificate in communication sciences and disorders.

(d) Minor in communication sciences and disorders. Applicant must have a minimum of 45 quarter credits, or 30 semester credits of coursework in communication sciences and disorders.

(2) Assessment: A qualitative and quantitative process, conducted by a licensed SLP speech-language pathologist (SLP), that measures the degree of communication impairment including, but not limited to, screening, norm and criterion referenced testing, behavioral observations, and clinical interview.

OAR 335-095-0030

Certification of Speech-Language Pathology Assistants

Applicants must submit all of the following to be eligible for certification.

~~(1)(a) If applying on or before August 31, 2021, Official transcripts showing 45 quarter hours or 30 semester hours of speech-language pathology technical course work; and Official transcripts showing 45 quarter hours or 30 semester hours of general education credit; or,~~

~~(b) If applying after September 1, 2021, official transcripts showing successful conferral of a degree from an Approved Training Program as defined in 335-095-0010(1).~~

(2) Written evidence of completion of clinical fieldwork that builds skills and competencies needed to practice as a speech-language pathology assistant.

(a) During clinical fieldwork in Oregon, the fieldwork participant must be enrolled in a speech-language pathology practicum course at an accredited college or university, or hold an Oregon provisional speech-language pathology assistant certificate.

(b) Clinical fieldwork must consist of a minimum of 100 clock hours of clinical interaction and 8 hours of consultation and assessment over a recommended 8-12 week period. Clinical interaction must be face to face interaction with clients and directly supervised 100% of the time. Clinical interaction must consist of actively participating in or leading individual, small group, co-treatment, or classroom therapy sessions, and may include speech or hearing screenings. The fieldwork participant must also meet with the supervising speech-language pathologist for at least two hours for every 25 hours of clinical interaction to assess the participant's developing clinical skills and competencies, for a total of 8 hours of consultation and assessment. Tasks such as clerical tasks, passive observations, and materials preparation may not be included in clinical fieldwork hours. Meetings with the supervisor may not be included in the 100 hours of clinical interaction.

(c) Clinical interaction documentation must show the date, clinical activity, amount of time and the supervisor's initials for each activity, and be signed by both the supervisor and fieldwork participant. The clinical fieldwork supervisor must be licensed by the Board, or hold the ASHA Certificate of Clinical Competence during the fieldwork. Clinical interaction must be completed within seven years prior to the date the application for licensure is received by the Board.

(d) The supervising speech-language pathologist and the fieldwork participant must complete the Board's SLPA Competency Checklist during and at the completion of 100 hours of clinical interaction to document the fieldwork participant's developing skills and competencies. The fieldwork participant must be rated as meeting or exceeding all skills upon completion of the fieldwork to qualify for certification as a speech-language pathology assistant. If there is more than one fieldwork supervisor, each supervisor who supervises 15 or more hours of fieldwork must complete and sign the Board's Competency Checklist.

(e) In extenuating circumstances where the fieldwork participant is unable to obtain the signature of their clinical fieldwork supervisor, the Board may accept a Board SLPA Competency Checklist signed by another supervising speech-language pathologist who is licensed by the Board or holds the ASHA Certificate of Clinical Competence and is able to render a professional opinion of the applicant's level of competence.

(f) Applicants who completed fieldwork in another state must provide documentation of at least 100 clinical interaction hours and The Board's Competency Checklist which must be completed and signed by their supervising speech-language pathologist. The supervisor must have held the ASHA Certificate of Clinical Competence while supervising the applicant. The Board will review the fieldwork log and final assessment in accordance with its clinical interaction requirements and SLPA Competency Checklist. If the fieldwork is not deemed equivalent to Oregon standards, the applicant must obtain a provisional speech-language pathology assistant certificate to complete fieldwork requirements for certification in Oregon.

(3) Applicants whose academic instruction was not conducted in English may be required to submit scores from the following standardized tests to demonstrate English language proficiency:

(a) The internet-based Test of English as a Foreign Language (TOEFL) with minimum scores of 100 overall, 26 in writing, and 26 in speaking; or

(b) The paper-based TOEFL and Test of Spoken English (TSE) with minimum scores of 600 overall; 5 on the essay; and 50 on the TSE; or

(c) The computer-based TOEFL and TSE with minimum scores of 250 overall; 5 on the essay; and 50 on the TSE.

(4) Applicants must demonstrate current professional competence as follows:

(a) Completion of clinical interaction as described in OAR 335-095-0030(3) (2) within the 12 months prior to application; or

(b) Completion of 5 hours of professional development within the 12 months prior to application.

(c) Any hours completed in the current professional development period may also be counted towards meeting the professional development requirement for the next active license renewal.

3. Conditional SLPs

~~335-080-0005~~

Definitions

~~(1) A Conditional License is a license certificate issued by the Board to applicants who have completed degree requirements in OAR 335-060-0006, and are engaged in post-graduate supervised clinical experience until they obtain regular licensure. The examination is not required for a conditional license.~~

~~(2) Supervisor means a licensed speech language pathologist or audiologist who undertakes responsibility for managing and directing a conditional licensee during their post-graduate supervised clinical experience and until they obtain regular licensure. A supervisor must hold an active license in speech language pathology issued by the Board or hold their Certificate of Clinical Competency in Speech Language Pathology issued by the American Speech Language Hearing Association.~~

~~335-080-0010~~

~~Licensing; Qualifications; Procedure~~

~~(1) An individual who intends to practice under a conditional license must apply with the Board on such forms as the Board shall provide for this purpose. Application shall include:~~

~~(a) The name and address of the supervisor and place of supervision;~~

~~(b) The education, training, and experience of the conditional licensee;~~

~~(c) A description of the duties and tasks expected to be performed by the conditional licensee.~~

~~(2) Evidence of meeting degree requirements, English language proficiency requirements, and current professional competence requirements as stated in OAR 335-060-0006.~~

~~335-080-0015~~

~~Supervisors Responsibility and Nature of Supervision~~

~~(1) The supervisor shall manage and direct the duties and functions of the conditional licensee and oversee the work performed by the conditional licensee.~~

~~(2) The supervisor shall keep records of the tasks performed by the conditional licensee and whether the work is performed competently.~~

~~(3) The Board reserves the right to limit the number of conditional licensees supervised by any one supervisor at any one time.~~

~~(4) Any changes in supervision must be reported to the Board within 30 days of the change.~~

~~(5) Supervision must be provided to meet requirements for the supervised clinical experience as defined in OAR 335-060-0006.~~

~~335-080-0025~~

~~Renewal or Upgrade of Conditional License~~

~~(1) The conditional license expires 12 months from its issuance. It may be renewed one time if required for the licensee to complete requirements for regular licensure.~~

~~(2) No later than 30 days prior to the expiration of their conditional license, a conditional licensee must apply to the Board for its renewal or upgrade to a regular speech-language pathology license. Applications for renewal or upgrade of a conditional license must be accompanied by the relevant license fee, and applications postmarked later than 30 days prior to the expiration must be accompanied by the delinquent fee. No application fee is required.~~

~~(3) To qualify for upgrade to a regular license, the conditional licensee must meet all requirements in OAR 335-060-0006.~~

~~(4) Conditional licensees may not practice independently until they obtain regular licensure.~~