



## Consumer Protection and Universal Licensure

State licensure plays a vital role in the provision of quality audiology and speech-language pathology services. Licensure ensures basic consumer protection and protects speech-language pathology (SLP) and audiology (Au.D.) professions Scope of Practice.

Within the past several years, there have been proposals to modify the standards and qualifications of speech-language service providers in attempt to remediate perceived shortages in the absence of data. Proposals have included the use of tiers paraprofessional service providers with education and training backgrounds from a high school diploma up through a master's degree. These less qualified providers of SLP services have no specified education and/or training requirements, specified supervisory procedures, or continuing education expectations. Although there is no clear data available that reports how many and to what extent the paraprofessionals are being utilized throughout the State of Wisconsin, it is a fact that there are paraprofessionals involved in SLP service provision.

Members of other statewide professional organizations such as the Wisconsin Council of Administrators of Special Services, have cited licensure as a barrier to hiring highly qualified speech-language pathologists to work in the school setting. School Districts are turning to Special Education Aides to assist speech-language pathologists. At this time, there is no data regarding the number of students who are receiving speech-language pathology services from a special education aide.

WSHA has been exploring universal licensure as a means to increase the number of qualified SLP professionals available in all service delivery settings across the State and to uphold the standards of consumer protection as well as to protect and regulate the SLP and Au.D. professions and standards. Additionally, universal licensure would support the ability for SLPs and Au.D.s to work in a variety of settings without licensure barrier.

### **Question: What is Universal Licensure?**

**Answer:** With universal licensure, all speech and language pathologists and audiologists in the state of Wisconsin will be required to hold a Department of Safety and Professional Services (DSPS) license, regardless of the practice setting. Each profession, audiology and speech-language pathology, will hold their own license.



**Question: What activities has WSHA completed regarding this topic?**

**Answer:** WSHA applied for and was awarded four ASHA Pathways to Excellence Grants to support WSHA's advocacy work. WSHA representatives participated in Wisconsin Council of Administrators of Special Services Task Force Committee that met over the course of a year, to inform, educate and advocate for the highest qualified provider in the schools. WSHA has surveyed SLP and Au.D. professionals across the state. WSHA has met with DPI representatives and held eight Town Hall meetings regarding universal licensure. WSHA has communicated updates via Facebook and WSHA eblasts sharing information and asking for membership input.

**Question: Is licensure tied to how I am funded in the Wisconsin Retirement System and would this change with universal licensure?**

**Answer:** Based on the preliminary findings documented in the Wisconsin Retirement System Administration Manual, eligibility is based on worked hours, not on licenses held. <http://etf.wi.gov/employers/wrschap3.pdf#page=3>  
WSHA is continuing to explore and confirm these findings.

**Question: Will WSHA include licensure language for SLPAs or Au.D.-As?**

**Answer:** Chapter 459 has had stipulations for unlicensed providers for over two decades. The key terminology documented is that the providers are unlicensed and the scope outlined in the Administrative Code limits their scope of practice.

Currently, DPI licenses, a 'Special Education Program Aide' <https://tepd1.dpi.wi.gov/licensing/special-education-program-aide-license> who according to the DPI is qualified to 'assist in a speech-language program.' The current qualifications for the Special Education Program Aide license is that the applicant is 18 years of age. The DPI guidance states that the Special Education Program Aide works under the direction of a speech-language pathologist.

Speech-language and audiology paraprofessionals/aides are currently working throughout the State of Wisconsin.

**Question: What will happen to the DPI license?**

**Answer:** WSHA has not developed a proposal nor met with all of the stakeholders. It is premature to determine what may/may not happen to the DPI license.



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563 Carter Court, Suite B | Kimberly, WI 54136 | 800-545-0640 | 920-882-3655 FAX

**Question: What happens if SLPs and Au. D.s apply for jobs in a new setting but they do not have any experience?**

**Answer:** As licensed professionals, we are required to engage in only those aspects of the professions that are within the scope of our professional practice and competence, considering our level of education, training, and experience.

As professionals, SLPs and Au.D.s are lifelong learners and have made a professional commitment to develop professionally.

**Question: Does the DSPTS license give you personal liability leaving you vulnerable to personal investigation should anyone disagree with your service and file a complaint?**

**Answer:** Speech-Language Pathology and Audiology professionals should honor their responsibility to achieve and maintain the highest level of professional competence and performance regardless of their work setting and have a commitment to the welfare of the consumers we serve.

Just as DPI has an avenue and process for filing complaints, so does DSPTS.

If a complaint is made with sufficient evidentiary support to suggest that a credential holder is in violation of a relevant condition or rule related to their profession the Division may investigate and, if necessary, file a disciplinary action against the credential holder.

The Department of Safety and Professional Services is responsible for ensuring the safe and competent practice of licensed professionals in Wisconsin.

**Question: Currently, the school SLP must have the training and expertise to combine therapeutic goals with educational standards and the student's classroom curriculum. The universal licensure proposal reduces the standards for school service and makes school based SLPs irrelevant. Will the preparation, knowledge, and skill the SLP needs to provide high quality services in a school setting be irrelevant under the DSPTS license?**

**Answer:** As stated in PI 34, the minimum number of clinical hours required by DPI is 100. Training comes from the IHEs in the form of school methods and disorders coursework. The expertise comes from on the job experience and working with other SLPs.

The UL would require that the ASHA certification is the highest standard and under that all holders of their CCCs meet the criteria as set forth by the Council for Clinical Certification in Audiology and Speech-Language Pathology (CFCC).

The Master's Degree is the minimal requirement for any SLP in the state.

With the question posed, new graduate students meeting the requirement for DPI in essence don't meet the expertise level to combine therapeutic goals with educational standards as they are new to the field.

The UL is not meant to demean any one group of therapists, but it is designed to help those with the qualifications to obtain a license to work in the state and to fill the open positions for SLPs both in the school and the medical community.



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**Question: A universal license leaves you as a school SLP open to encroachment on your job and eliminates the high educational standards which now apply to SLPs in the schools. This move will allow private SLPs more leeway in a school without having to do the work you did. This also allows for anyone without a license to provide speech pathology service. You would be responsible for and supervising this person.**

**Answer:** *PI 34.30 (L) Speech and language pathology.* In order to qualify for a speech and language pathology license, an applicant shall meet all of the following:

1. Has a master's degree in communicative disorders.
2. Training within the undergraduate and graduate program shall include a minimum of the following:
  - a. Speech disorders.
  - b. Language disorders.
  - c. Hearing disorders and hearing evaluation.
  - d. Hearing habilitative and rehabilitative procedures.
3. Professional education and training to include course work in all of the following:
  - a. Methods or procedures in school speech and language programs.
  - b. Understanding and use of augmentative and nonverbal communication modes and systems.
4. A supervised practicum meeting American Speech Language Hearing Association standards of which at least 100 hours shall be in a school setting to include experiences with a wide range of communicative disorders.

This is the current PI 34 language about the license requirements for an SLP in Wisconsin. Number 4 is the one caveat that is unique to the license for our state. This is carried out by the IHEs with those students looking for DPI certification.

How this negatively impacts out of state SLPs is that while they may have worked many years in a public school in another state, they may not have completed 100 hours of supervised work thus making their work time irrelevant for DPI.

This rule may have been written with a new graduate in mind from a Wisconsin school, but it does not take into account those coming from other parts of the country. The graduate degree is designed to train SLPs to work in all settings and all of the IHEs in Wisconsin offer coursework and practicum related to public schools.

What the DPI license does not require is an ASHA certification which is required in all other non-school settings in the state. If the profession views holding the ASHA certification as the highest standard for practice, then that same standard should be applied to the school based SLP.

With a rule change, WSHA would look to the IHEs for input on how to accomplish this for all students.



**Question: What happens next?**

**Answer:**

WSHA has not presented any proposals.

WSHA is in the fact-finding mode and is having preliminary discussions with all stakeholders.

WSHA educates and advocates for the speech-language pathologists and audiologists across the state – not against them.

WSHA wants to hear from you.

**Please share your comments, questions and ideas**

## Contact WSHA

563 Carter Court, Suite B

Kimberly, WI 54316

Phone: 920.560.5642

[WSHA@badgerbay.co](mailto:WSHA@badgerbay.co)



WISCONSIN SPEECH-LANGUAGE PATHOLOGY  
and AUDIOLOGY ASSOCIATION

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