



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

January 30, 2015

Representative Mitch Greenlick  
Chair, House Committee on Health Care  
900 Court St. NE, H-493  
Salem, OR 97301

RE: H.B. 2796

Dear Representative Greenlick:

On behalf of the American Speech-Language-Hearing Association's members, I am writing to address a concern with the recent proposed legislation, H.B. 2796, which we believe unnecessarily licenses music therapists.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for more than 173,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 1,700 members reside in Oregon.

### **Speech-Language Pathologists: Professionals Trained to Assess and Treat Communication Disorders**

Speech-language pathologists (SLPs) are uniquely educated and trained to assess and treat speech, language, hearing, swallowing, balance, and cognitive communication disorders in children and adults. These services help children acquire language and enable individuals to recover essential skills to communicate about their health and safety, to safely swallow adequate nutrition, and to have sufficient attention, memory, and organizational skills to function in their environment.

SLPs complete a comprehensive education program that meets rigorous standards of practice based on objective methodology which includes the following:

- A master's or doctoral degree with **75 semester credit hours in a course of study addressing the knowledge and skills pertinent to the field of speech-language pathology, as determined, validated, and systematically updated using a skills validation process.**
- A minimum of 400 clock hours of supervised clinical experience in the practice of speech-language pathology, with the supervision provided by individuals holding the ASHA Certificate of Clinical Competence (CCC).
- A passing score, determined by a cut score analysis, on a national examination administered and validated by the Educational Testing Service.
- Completion of a supervised Clinical Fellowship to meet the requirements of the Certificate of Clinical Competence, the recognized standard in the field.
- State licensure (SLPs are regulated in all 50 states and the District of Columbia).
- Completion of 30 hours of professional development activities every 3 years.

### **Music Therapists: Broad Scope of Practice**

Music therapists (MT) are certified through the Certification Board for Music Therapy (CBMT), which broadly defines music therapy and states that MTs can assess sensory, physical, and cognitive and communication abilities. While H.B. 2796 states that MTs cannot diagnosis communication disorders, MTs certified by the CBMT are required to abide by their broad scope of practice that is identified in their Board Certified Domains, which allows for assessment of communication disorders. We believe that a profession's scope of practice is limited to specific competencies acquired through education, training, and practical experience. Unlike SLPs, MTs are not subject to the same rigorous qualification standards and do not acquire the skills necessary to assess and treat communication disorders in their prescribed program of study and subsequent clinical training. However, SLPs are uniquely qualified and trained to evaluate and treat communication disorders.

Of the music therapy licensure bills that have been proposed, only four states have adopted legislative language to regulate MTs through licensure. The Washington state sunrise review below is an illustrative example of state objections to music therapy licensure.

### **Washington State Sunrise Review**

In December 2012, the Washington State Department of Health completed its sunrise report on the proposed regulation of MTs. Washington MTs had indicated that the regulation of their profession was necessary to protect the public from misuse of terms and techniques; ensure competent practice; protect access to music therapy services by encouraging payment by third-party payers; recognize music therapy as a valid, research-based health care service; validate the profession in state, national, and international work settings; establish credentialing; and provide a method of addressing consumer complaints and ethics violations.

The Department found that the regulations of MTs do not meet the sunrise criteria based on the following:

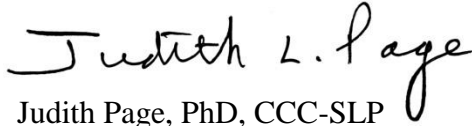
- The applicant had not identified a clear and easily recognizable threat to public health and safety from the unregulated practice of music therapy.
- The proposal did not articulate the public need for regulation or that regulation would ensure initial and continuing professional ability above the current requirements for nationally certified music therapists.
- The applicant did not demonstrate that the public cannot be effectively protected by other means in a more cost-beneficial manner.
- The proposal would place a heavy financial burden on the small pool of potential music therapy practitioners to cover the state's costs of regulating the profession.
- The proposal contains flaws that would prohibit the use of music-based therapy by other practitioners as well as Native American and other traditional healers who may use music to aid the sick, injured, or dying.

While the CBMT Domains assert that MTs can assess and treat individuals with a wide range of disorders, we believe that SLPs are the only professionals who can appropriately assess and plan treatment for individuals with communication disorders. Therefore, we urge you reject the proposal to license MTs.

ASHA Comments  
January 30, 2015  
Page 3

Thank you for the opportunity to submit comments. Should you have any questions or need further information, please contact Eileen Crowe, ASHA's director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org) or by phone at 301-296-5667; or Janet Deppe, ASHA's director of state advocacy, at [jdeppe@asha.org](mailto:jdeppe@asha.org) or by phone at 301-296-5668.

Sincerely,

A handwritten signature in black ink that reads "Judith L. Page". The signature is written in a cursive style with a large, looped 'J' and 'P'.

Judith Page, PhD, CCC-SLP  
2015 ASHA President

cc: Representative Julie Parrish  
Members of the House Committee on Health Care