



AMERICAN  
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ASSOCIATION

August 15, 2018

Dear Marissa,

Thank you for contacting the ASHA Board of Directors with your concerns about several issues within the profession of speech-language pathology (SLP). We appreciate your thoughtful comments you shared on behalf of the other ASHA members. Clinical practice in SLP certainly presents several challenges in the current climate of policy changes, fiscal and human resource limitations that affect service delivery in both educational and health care settings. SLPs are making huge differences in the lives of students, clients and patients every day. As a member-centric organization, ASHA is committed to supporting you and all of our members in meaningful ways. Please allow me to provide some information about the work ASHA staff and volunteers do related to your concerns.

Advocacy and providing access to tools and resources that enhance professional practice are core elements of ASHA, which is the national, professional, scientific and credentialing association for speech-language pathologists and audiologists. ASHA works to advance the influence and demonstrated value of services provided by our member speech-language pathologists to lawmakers and policymakers in Washington, D.C., as well as state capitals across the nation. As we live in a time marked by political uncertainty, sharpened ideological divisions, and shrinking budgets, it is especially important that both the value and quality of SLP services are understood and reflected in relevant laws and regulations.

ASHA employs government affairs and public policy experts that advocate on behalf of our members. These experts undertake a number of critical activities including:

- building strategic relationships with influential lawmakers and policymakers;
- engaging in robust policy analysis and development;
- communicating with ASHA members, lawmakers, policymakers, and the general public;
- creating opportunities for ASHA members to become advocates, and;
- building and sustaining strategic coalitions with allied stakeholders.

ASHA is actively addressing several issues of critical importance to speech-language pathologists, which include equitable reimbursement for services rendered, robust school funding, and reasonable productivity standards. While recognizing the challenges of the current political environment, ASHA continues to seek opportunities to advance these issues with members, who offer critical clinical expertise and compelling stories. We also have a multiyear Value of the CCCs campaign that targets employers to educate them about the certificates of clinical competence.



In advocating for the professions, ASHA also understands the challenges created by unreasonable expectations of productivity applied by many employers in certain settings. Unrealistic productivity standards and administrative demands for service delivery driven by reimbursement rather than the needs of consumers is a fundamental problem with aspects of the current health care system. In addition, challenges are also visible in educational settings. ASHA has engaged actively with industry leaders in health care to address this problem. For example, ASHA led the effort to collaborate with AOTA and APTA to develop the [Consensus Statement on Clinical Judgement](#) to support members in efforts to push back against unreasonable administrative mandates.

Such mandates infringed on their clinical judgement and drove the focus on productivity as a reflection of billable minutes rather than the full scope of work that is meaningful to client care. Similarly, ASHA led the development of the [Compliance Reporting](#) document to provide additional information and resources for members to address problematic circumstances they are faced with in their employment settings. While these resources are helpful in addressing problems in clinical settings, ASHA also has engaged with industry leaders and stakeholders such as the Department of Justice, when for example, administrative mandates from companies have illegally usurped the clinical judgement and authority of speech-language pathologists to determine the course of treatment for their clients.

Recent developments and changes in the way post-acute care services are reimbursed by Medicare provide opportunities for speech-language pathologists to demonstrate value to health care systems and outcomes beyond discrete therapy minutes. ASHA is working aggressively with other stakeholders to take advantage of the changing payment incentives to eliminate the emphasis on productivity as a reflection of billable minutes but rather to consider the overall impact of member services on quality service delivery and patient outcomes. While productivity considerations are unlikely to go away entirely under the new payment systems, there is an opportunity to use the changes to the advantage of members and the clients they serve, and to define the value metrics for the profession.

Staffing shortages due to inadequate funding at the local, regional, state and federal levels contribute to the pressures speech-language pathologists experience regarding caseload and workload metrics. As the national association representing audiologists and speech-language pathologists, ASHA is best suited to address larger scale policy and funding issues that are influenced by federal policies and programs. To that end, ASHA continues its advocacy efforts to increase dedicated federal funding for the [Individuals with Disabilities Education Act](#) (IDEA) as well as several other funding streams and programs critical to improving funding for school-based services at all levels.. These efforts have helped to establish the resources necessary to address one of the main pressures resulting in unreasonable expectations for the workload of school-based members.



Additionally, ASHA regularly meets with Department of Education officials as well as Medicaid decision-makers at the Centers for Medicare & Medicaid Services (CMS) to discuss the importance of adequate funding for school-based services. However, the recent tax legislation enacted by Congress places increased pressure on school funding by making it harder for local and state governments to raise revenues. ASHA's advocacy team is working diligently with Congress to highlight this problem and to urge the investments necessary in education to ensure students receive the public education to which they are entitled. We lobby members of Congress, provide comments and feedback to federal agencies and work in national coalitions focused on education and education funding. The connection between manageable workloads and funding is direct; funding is a priority within the [ASHA Public Policy Agenda](#).

Several ASHA teams include speech-language pathologists (e.g., Government Affairs and Public Policy, Clinical Issues, Health Care Services, School Services as well as the Office of Multicultural Affairs) that provide professional consultation and technical assistance to members. ASHA staff regularly provide information based on education and expertise.

The content of ASHA's Professional Development opportunities is informed by the common issues noted during professional consultations, such as ASHA survey results, and other sources of member data that describe clinical and professional needs. An example of a recent collaboration with decision makers that brought longstanding issues of school-based members front and center is the **ASHA Schools Virtual Town Hall**, which occurred during the second week of August. School leaders (two principals), district leaders (former assistant superintendent and a superintendent), state leaders (two state education advocates), and a National Education Association union representative comprised the panel that presented feasible solutions to the issues as well as describing how individuals in their respective roles could collaborate to foster systemic change. The longstanding issues addressed were school funding, high caseloads, excessive paperwork, and barriers to varying service delivery methods. The town hall was recorded and will be made freely available to interested parties in the Trending Topics section of the School Services Team's [webpage](#) by the end of August. We encourage the use of this resource by ASHA members, ASHA staff, and other stakeholders to adopt or adapt solutions posed to address similar issues faced by SLPs in schools across the nation.

ASHA recognizes that productivity demands and high caseloads put undue stress on speech-language pathologists and lead to burnout. While we have highlighted several advocacy efforts that are happening at the federal, state and industry-wide levels, we know that you are fighting to demonstrate the value of your services each day to administrators in different clinical settings. ASHA has resources for [school-based](#) and [health care-based](#) speech-language pathologists that can support your grassroots advocacy efforts and clinical practice.



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Please also connect with the ASHA professional practices staff of speech-language pathologists anytime via phone (800-498-2071) or email ([schools@asha.org](mailto:schools@asha.org); [healthservices@asha.org](mailto:healthservices@asha.org)). We absolutely want to work with you in your efforts and help you create meaningful change in your workplace and are open to ideas.

On a different note, you also inquired about ASHA's [corporate partnership program](#). This program offers companies marketing opportunities and the chance to develop a relationship with ASHA members. However, partnership is not an endorsement or recommendation of any product, service, program or organization. The goal is to generate revenue beyond member fees that provides funding for ASHA to offer more programs, services, and opportunities for members. We would be happy to talk to you more about the corporate partnership program and the nature of the relationships with the different organizations if you have additional questions.

We hope the information presented in this response letter is helpful to you and other speech-language pathologists that added their names to your letter. We would like to continue to engage with you to effect lasting changes in clinical practice. Please let us know if we can be of further assistance.

Sincerely,

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