

# SLP-Assistant and Audiology Assistant licensing and roles/responsibilities

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# WHY Assistants? History in Montana

- a. Montana used to have 3 levels of licensed Assistant/Aide changed around 2015?
- b. That was changed to one class of registered Aides , called aides/assistant
- c. Aides/assistants had to operate attached to license of a Master's level SLP, or AuD (the registration process).
- d. There was no requirement for initial or continuing education when they moved to the registered Aide system
- e. Other therapy types have long had independently licensed Assistants
- f. National movement to bring SLP/AuD in line with these other therapy types for quality provision of services.

# WHY Assistants?

## IN SHORT:

In order to bring Speech Language Pathology and Audiology into line with other therapies, we need to ensure that Assistants are well-trained and can practice under their own license under the supervision of an SLP or AuD.

# The Legislative Process: Where we came from, where we're going:

## 2019: HB270 (Tabled/Died)

- a. Tabled in House Business and Labor and then died at Transmittal
- b. The legislature felt this bill put the cart before the horse, because at the time the bill was introduced, there was not Speech-Language Pathology Assistant program in place in Montana. There was resistance to licensing first, education available later. Shortly after the legislature, the program was ready to go at UM. but now the program is in place at UM.

## 2021: HB210 (Passed)

- a. Removed Aides as a category that needed to register under the license of an SLP.
- b. This bill caused problems because it was modeled after the ASHA Certification model:
  - i. It required that Assistants passed an examination and that they completed practicum hours
  - ii. A psychometrically tested examination for assistants was not available except from ASHA, and they decline to allow states to use their examination for National CERTIFICATION for the purpose of LICENSING.
  - iii. Montana has only one SLP Masters/Doctoral level program and no AuD program. Under the Accredited SLP program at UM (and nationally), SLPs who supervise graduate students must be nationally certified by ASHA (hold their CCC).
- a. Medicaid and mixed messages: Big problems for schools and co-ops

# The Legislative Process: Where we came from, where we're going:

**2023: SB300** (to Amend HB 210, 2021) Passed

- a. Removed requirement for both examination and practicum hours prior to licensing
- b. Moved date to be qualified by hours (Aide to Assistant pathway) to January 1, 2024

## **2025: Amendment**

- a. The intent of the SLPA/AA Bills has always been to allow an Aide to Assistant pathway for a short amount of time to ensure that those using aides would not lose that help.
- b. The passage of the 2021 iteration of the bill caused a big problem with Medicaid billing and Directors were told they couldn't use aides. MSHA was told that it was not a problem so we got conflicting stories. Our bills have sought to keep the pathway. Please see notes regarding Aide to Assistant pathway later in this presentation.

# Becoming a licensed Assistant in Montana

- Montana has one Associate of Arts Degree offering through Missoula College at U of M.

<https://catalog.umt.edu/colleges-schools-programs/missoula-college/applied-arts-sciences/aa-slpa/#requirements>

(60 credits of which 29 are specific to SLP)

**There are also MANY online courses and accepted equivalents offered in other states.**

- Montana has one Bachelors of Arts Degree for Communication Sciences and Disorders at U of M.

[https://www.umt.edu/speech-language-hearing-occupational-sciences/campus\\_based\\_programs/2022-2023-advising-workbook-cb.pdf](https://www.umt.edu/speech-language-hearing-occupational-sciences/campus_based_programs/2022-2023-advising-workbook-cb.pdf) (Over 100 credits of which 51 or more are specific to SLP).

- \*\*\*Completion of either of these tracks qualifies someone for licensure, as does completing the CSD-specific undergraduate courses as a “leveling” student with a BA/BS in another area. \*\*\* (waiting on confirmation from licensing board but this should be a path).
- Aide to Assistant Pathway (690 hours for SLPA, 100 hours for Audiology Assistant: available for a short time)

# Becoming a licensed Assistant in Montana

## **24.222.550 ASSISTANT LICENSURE – INITIAL APPLICANTS**

(1) To practice as a licensed speech-language pathology or audiology assistant in Montana, all assistants must have at least one Montana licensed practitioner of the same profession to supervise the assistant per 37-15-102, MCA.

(2) **Speech-language pathology assistant** applicants not currently licensed in another state or jurisdiction and who did not serve as unlicensed aides or assistants in Montana prior to January 1, 2024, must have either:

(a) a baccalaureate degree in speech-language pathology or communication sciences and disorders from an accredited institution; or

(b) a speech-language pathology assistant certificate or associate degree from an accredited institution.

(3) Speech-language pathology assistant applicants not currently licensed in another state or jurisdiction and who served as unlicensed aides or assistants in Montana prior to January 1, 2024, but do not meet the requirements in (2)(a) or (b) must have a minimum of **690 hours** of practical experience under the supervision of a speech-language pathologist.

# Becoming a licensed Assistant

## **24.222.550 ASSISTANT LICENSURE – INITIAL APPLICANTS**

**(4) Audiology assistant applicants** not currently licensed in another state or jurisdiction and who did not serve as unlicensed aides or assistants in Montana prior to January 1, 2024, must have either:

- (a) a baccalaureate degree in communication sciences and disorders from an accredited institution;
- (b) an audiology assistant certificate or associate degree from an accredited institution; or
- (c) a high school diploma or equivalent and a minimum of 10 hours of additional board-approved training in audiology.

(5) Audiology assistant applicants not currently licensed in another state or jurisdiction and who served as unlicensed aides or assistants in Montana prior to January 1, 2024, but do not meet the requirements in (4)(a), (b), or (c) must have a minimum of 110 hours of practical experience under the supervision of an audiologist.



# Becoming a licensed Assistant

## Post presentation notes:

The language in the MCA states individuals who “served as unlicensed aides or assistants in Montana prior to January 1, 2024” are eligible for assistant licensure for both SLP and Audiology (grandfather clause).

This means that anyone who served in this position in the past at any time could be eligible for assistant licensure, including individuals who had to change jobs after the 2021 Legislature.

<https://rules.mt.gov/gateway/RuleNo.asp?RN=24%2E222%2E550>

# Becoming a licensed Assistant : Out of State Applicants

## 24.222.553 ASSISTANT LICENSURE – OUT-OF-STATE APPLICANTS

(1) To practice as a licensed speech-language pathology or audiology assistant in Montana, all assistants must have at least one Montana licensed practitioner of the same profession to supervise the assistant per 37-15-102, MCA.

(2) Applicants for speech-language pathology assistant and audiology assistant licensure currently licensed in another state or jurisdiction must hold a current, active license in good standing to practice as a speech-language pathology assistant or audiology assistant in a state or jurisdiction which standards at the time of application are substantially equivalent to Montana's standards.

# CONTINUING ED REQUIREMENTS FOR SLPA/AA

- **24.222.2120 CONTINUING EDUCATION**
- (1) Licensees must obtain the following continuing education (CE) hours annually, prior to renewal:
  - (a) ten hours for speech-language pathology or audiology;
  - (b) 15 hours for dual licensure in speech-language pathology and audiology, with at least five hours each in speech-language pathology and audiology; or
  - (c) five hours for speech-language pathology or audiology assistants.
- (2) Continuing education requirements do not apply until a licensee's first full year of licensure.

# SCOPE OF PRACTICE

Montana is no longer listing scope of practice in ARM or CFR language. Instead, they suggest using a nationally recognized scope, such as that provided by ASHA.

ASHA provides a full scope of practice document that delineates the roles of SLP vs. SLPA. It is located here:

# SCOPE OF PRACTICE: SLP Assistants may not engage in the following activities:

- representing themselves as the SLP; \*\*Clients/guardians must be informed that their practitioner is an SLPA
- interpreting assessment tools for the purpose of diagnosing disability, determining eligibility or qualification for services;
- disclosing clinical or confidential information (e.g., diagnosis, services provided, response to treatment) either orally or in writing to individuals who have not been approved by the SLP to receive information unless mandated by law;
- writing, developing, or modifying a student's, patient's, or client's plan of care in any way;
- making referrals for additional services;
- assisting students, patients, and clients without following the individualized plan of care prepared by the licensed SLP;

# SCOPE OF PRACTICE: SLP Assistants may not engage in the following activities:

- selecting AAC systems or devices;
- assisting students, patients, and clients without access to supervision;
- providing input in care conferences, case conferences, or any interdisciplinary team meeting without the presence or prior approval of the supervising SLP or other designated SLP;
- providing interpretative information to the student, patient, client, family, or others regarding the student's, patient's, or client's status or service;
- signing or initialing any formal documents (e.g., plans of care, reimbursement forms, reports) without the supervising SLP's co-signature;
- discharging a student, patient, or client from services.

# SCOPE OF PRACTICE: SLP Assistants may not engage in the following activities (Continued):

- treating medically fragile students, patients, and clients without 100% direct supervision;
- administering or interpreting feeding and/or swallowing screenings, checklists, and assessments;
- diagnosing communication and feeding/swallowing disorders;
- developing or determining the feeding and/or swallowing strategies or precautions for students, patients, and clients;
- **performing procedures that require specialized knowledge and training**
  - a. THIS BULLET POINT REQUIRES SPECIAL ATTENTION**
  - b. SLPs have Master's Degrees and our scope is very broad. New research comes out frequently that impacts the treatment of all clients, not just those with swallowing and feeding or voice disorders. The continuing education that is offered for both SLPs and SLPAs is incredibly important for ethical treatment. SLPs should be sure that their SLPAs also have Continuing Education hours for the treatments they prescribe to be followed by SLPAs. Once the SLPA is educated, they can do much of the ethical, evidence-based treatment that the SLP could provide.

# Medicaid Reimbursement in Schools for Assistants

Montana Healthcare Programs can be an important source of funding for schools, particularly because the cost of providing special education can greatly exceed the federal assistance provided under the Individuals with Disabilities Education Act (IDEA).

Children who qualify for IDEA are frequently eligible for Montana Healthcare Programs services.

Although Montana Healthcare Programs is traditionally the “payer of last resort” for health care services, it is required to reimburse for IDEA related medically necessary services for eligible children before IDEA funds are used.



# Medicaid Reimbursement in Schools for Assistants

***Therapy Services*** (Updated in the school based services manual on 03/06/2020 with no recent changes)

“Therapy includes speech, occupational and physical therapy services. Services may be performed by a therapy assistant or therapy aide within their scope of practice but must be billed to Montana Healthcare Programs under the school’s supervising licensed therapist’s NPI. (See the Billing Procedures chapter in this manual.)

- Telehealth services are allowed for Physical Therapy, Occupational Therapy and Speech Therapy. All Montana Medicaid covered services delivered via telemedicine/telehealth are reimbursable so long as such services are medically necessary and clinically appropriate for delivery via telemedicine/telehealth.”

# Medicaid Reimbursement in Schools for Assistants

## *Post presentation update:*

**\*\*During the MCEC Presentation in Missoula, Special Education Directors pointed out that the underlined language “scope of practice” is why they were told by the MT SLP/AuD Licensing Board they could not bill Medicaid using services provided by aides under the supervision of a licensed therapist.\*\***

The language involving scope of practice for aides was removed with the 2021 bill that removed the category of registered aide.

MSHA is committed to working with SAM and MCASE to resolve all issues pertaining to assistants in the upcoming legislative session.

# Medicaid Reimbursement in Schools for Assistants

## *Therapy Services*

- “Services may be performed by a therapy assistant or therapy aide but must be billed to Montana Healthcare Programs under the school’s NPI and taxonomy. Remember to use the CCI edit modifier for all three types of therapy: speech, occupational and physical. See the Submitting a Claim chapter in this manual.”
- There is currently no reference to Audiology Assistant in the School Based Services Manual
- Although this is the information that has been in the school-based services manual since 2020, (legislation passed in 2021 and 2023 regarding Aides) MT SpEd Directors were told not to use Aides, which greatly disrupted their services. Communication with MT Medicaid has not yet yielded a response or information about any type of change. .

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