



August 14, 2024

Adriena Krul-Hall
Medicaid Policy Specialist
Michigan Department of Health and Human Services
333 S. Grand Avenue
P.O. Box 30195
Lansing, MI 48909

RE: Medicaid Enrollment Requirements for Speech-Language Pathologists

Dear Ms. Krul-Hall:

On behalf of the American Speech-Language-Hearing Association (ASHA), I respectfully write in response to the Michigan Department of Health and Human Services' (MDHHS) proposed policy changes to remove ASHA's Certificate of Clinical Competence (CCC) as a requirement for provider enrollment for speech-language pathologists (SLPs).

ASHA is the national professional, scientific, and credentialing association for 234,000 members, certificate holders, and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students.

Proposed MDHHS Provider Enrollment Requirements for SLPs

ASHA understands state agencies determine enrollment criteria to best serve their Medicaid beneficiaries. We believe in the ASHA CCC and the standard of practice that it signifies. ASHA and the Michigan Speech-Language-Hearing Association (MSHA) worked together to establish a comprehensive type of licensure in Michigan that is in line with the standards established for the CCC. Thus, ASHA is confident that the standards set forth in Michigan licensure assure Medicaid beneficiaries continued access to high-quality providers and speech-language pathology services, should MDHHS finalize its proposal to remove the ASHA CCC as a provider enrollment requirement for SLPs.

We offer the following background information on ASHA certification standards and Michigan licensure. We also urge MDHHS to consider the comments submitted by MSHA.

ASHA Certification

The CCC is a nationally recognized professional credential that represents a level of excellence in the fields of audiology and speech-language pathology. Before state licensure, the CCC afforded MDHHS an assurance of quality and accountability for service delivery and health plan provider enrollment in the state.

ASHA's CCC offers indicators of quality and training that may not always be consistently required across states, including compelling certificate holders to abide by an ethical code of conduct and requiring professional development in ethics and ethical decision making, as well as cultural competency, cultural humility, culturally responsive practice, and diversity, equity, and inclusion. The CCC also provides clinicians with the portability afforded by a national standard of training and education; if a certified clinician moves from one state to another, the CCC requirements remain uniform and can provide an efficient means to demonstrate standards when individual state licensing requirements differ. The CCC also protects against changes in

state licensure standards due to deregulation of licensing requirements in different professions. Some state licensing laws mimic those of ASHA's standards for the CCC, and some do not.

Michigan State Licensure

Michigan was the 48th state to regulate speech-language pathology in January 2009. Though it was one of the last speech-language pathology licensure laws in the United States to be created, it is comprehensive, requiring SLPs to have a license to practice in any setting in the state. Before state licensure was created in Michigan, the CCC existed to allow provider enrollment in MDHHS as a measure of quality provided to Michigan Medicaid beneficiaries. It took several years of dedicated advocacy to create this licensure category. ASHA and MSHA worked closely with other stakeholders—like the American Academy of Otolaryngology-Head and Neck Surgery, the Michigan Department of Education, and others—to create a path to licensure for our members in the state. In Michigan's case, the licensure standards were based closely on ASHA's certification standards because ASHA and MSHA worked together to ensure Michigan licensure was among the most rigorous and held providers to a high-quality standard. ASHA and MSHA did not lobby for including the CCC as a requirement of state licensure.

Thank you for the opportunity to provide information regarding Michigan licensure and its alignment with the ASHA CCC standards. We have greatly appreciated MDHHS' partnership in addressing ASHA member concerns, reinstating therapy provider stakeholder meetings, and implementing several payment rate increases for our members in the past few years. The work we have accomplished together supports ASHA's advocacy focus on coverage, payment, and administrative program challenges for our members. We look forward to our continued collaboration.

If you or your staff have any questions, please contact Caroline Bergner, ASHA's director of health care policy for Medicaid, at cbergner@asha.org and Doanne Ward-Williams, ASHA's senior director of state affairs, at dwardwilliams@asha.org.

Sincerely,



Tena L. McNamara, AuD, CCC-A/SLP
2024 ASHA President