



March 18, 2024

Ms. Michelle Paczynski
Administrator
Office of Policy Development and Research
U.S. Department of Labor, Employment and Training Administration
200 Constitution Avenue, NW
Washington, DC 20210

RE: National Apprenticeship System Enhancements

Dear Ms. Paczynski:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to provide feedback on the U.S. Department of Labor's proposed rule to improve the capacity of the National Apprenticeship System to respond to evolving employer needs, provide workers equitable pathways to good jobs, and increase the system's long-term resilience.

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

ASHA supports the revision of the regulations for registered apprenticeship by "enhancing worker protections and equity, improving the quality of registered apprenticeship programs, revising the State governance provisions, and more clearly establishing critical pipelines to registered apprenticeship programs, such as registered career and technical education (CTE) apprenticeships." Any revisions to applicable apprenticeship programs should ensure that career pathway opportunities are explicitly available to a wide range of fields, including audiology and speech-language pathology. **We support strengthening the federal workforce personnel pipeline system to explicitly include audiology and speech-language pathology.** This includes equal access to all workforce programs across an individual's professional career regardless of setting (e.g., clinical or school-based).

There's a critical need for more audiologists and SLPs. According to the Bureau of Labor Statistics, the audiology profession is projected to grow 10% between 2021 and 2031.¹ The speech-language pathology profession is projected to grow 21% over the same time period.² So it's imperative for the federal government to continue expanding the opportunities available for audiologists and SLPs across all federal workforce programs, including apprenticeships.

Thank you for the opportunity to provide feedback. If you or your staff have any questions, please contact Bill Knudsen, ASHA's director of education policy, at bknudsen@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Tena L. McNamara". The signature is written in a cursive style with a large initial "T" and "M".

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

¹ American Speech-Language Hearing Association. (2022). *Supply and Demand Resource List for Audiologists*. <https://www.asha.org/siteassets/surveys/supply-demand-audiology.pdf>.

² American Speech-Language Hearing Association. (2022). *Supply and Demand Resource List for Speech-Language Pathologists*. <https://www.asha.org/siteassets/surveys/supply-demand-slp.pdf>.