



# Oregon

Tina Kotek, Governor

**Board of Examiners For  
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## **HB 2423**

**House Committee on Education, March 12, 2025**

Chair Neron and Members of the House Committee on Education:

House Bill 2423 would establish a Task Force on Licensed Health Care Services in Oregon Schools. The Board of Examiners for Speech-Language Pathology & Audiology (BSPA) does not have a position on the bill, and I am appearing as a neutral fact witness.

The Board of Speech-Language Pathology and Audiology was created by the Legislature in 1973 to ensure the availability of the highest possible quality speech-language pathology and audiology services to people of this state who have communication disabilities. The Board licenses and regulates Speech-Language Pathologists (SLPs), Speech-Language Pathology Assistants (SLPAs) and Audiologists. We have two SLPs, two audiologists, two public members, one ENT physician, and one Speech-Language Pathology Assistant (SLPA) on the board, and three full time staff. When I started in 2015 we had about 2,100 licensees and today there are more than 4,000 with that number continuing to increase by at least 13% per biennium.

The Board fortuitously implemented our first Telepractice rules in 2019 just before the pandemic. Since that time, Oregon has been attracting an enormous, record-breaking number of new licensees who live outside of the state. In 2024, 85% of all new SLPs licensed and working with Oregon students and patients were located out of state. Oregon has fairly permissive telepractice rules, allowing its licensees to provide services from, or to, anywhere in the world. Oregon rules even allow for the remote supervision of Speech-Language Pathology Assistant's from SLP's living across the USA. The Board issues licenses within one business day of receiving application materials. Telepractice has been great for Oregon, but we are now learning comes with its own issues.

Oregon, and all states but one require SLPs to have a Master's degree plus 1,080 hours of supervised clinical practice before they become fully independent, licensed SLPs. In 2015, the legislature followed the national "universal licensure" trend put forth by the professional associations, and consolidated all SLP licensing and oversight of the profession with BSPA. Prior to the universal licensure bill, TSPC issued teacher's licenses for people who had a bachelor's degree in communication disorders and teaching. These individuals could obtain a "communication disorders endorsement" from TSPC that allowed them to both teach, and work as, and use the title of speech-language pathologists in the public schools. People with that credential continue to work as SLPs in Oregon schools, but the 2015 legislation eliminated that TSPC endorsement for new SLPs, who must go through BSPA.

This legislation asks the task force to review scope of practice and submit a report to the five boards listed. BSPA has never had any cases in my ten years where SLPs practiced any differently than they do in medical settings, with the exception of swallowing, which requires specialized training and sometimes facilities. SLPs work collaboratively in all settings, and each setting offers different tools and opportunities, but in the end, scope of practice is scope of practice, which the work of this task force would underscore.

The Board does not regulate settings. That said, there may be a few instances where Board rules, especially related to non-treatment/scope protocols, could and should be adjusted for school settings. In fact, the Board already does have some additional rules and exemptions for schools in the area of speech-language pathology assistants (SLPAs). In addition, the issue of settings came up a couple

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of years ago regarding the requirement for all ORS 676 medical field licensees to offer interpreters. The statute requires all medical interpreters be selected from the official OHA -approved pool. However, public schools in Oregon were already required to provide interpreting services including models for use by the medical professionals working in the schools and the Board received comments from administrators that this was going to be unworkable. I worked with OHA and some of the other Boards on the issue, and the legislature added the ability to exempt school districts if they had their own interpreters. Another example is recordkeeping. Currently, Board rules regarding recordkeeping are expected in all settings and must be followed in order to bill Medicaid. However, SLPs working in schools also have recordkeeping requirements for IEPs and other school needs. So, that could be another area where it might make sense to have slightly different Board rules for schools.

I was asked to comment on our rulemaking process, which is handled by myself along with my administrative assistant who acts as official rulemaking coordinator. We have both gone through training with the Secretary of State's office. I believe we have followed all rulemaking statutes and rules during my tenure, including involving all constituencies in meetings, obtaining proper board authorization, holding public hearings, taking public comments, and obtaining board vote on the final rules. We have received and are currently reviewing Governor Kotek's recent rulemaking direction to Agencies to ensure we are in compliance and consistent across the Enterprise. During 2025, the Board is reviewing each and every rule in OAR 335. This rulemaking plan and schedule will be posted by May 31<sup>st</sup> on our website, per the Governor.

Sincerely,

Erin K. Haag, Executive Director  
Oregon Board of Examiners for Speech-Language Pathology and Audiology (BSPA)