



STATE OF DELAWARE
STATE COUNCIL FOR PERSONS WITH DISABILITIES

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MEMORANDUM

DATE: July 30, 2018

TO: Ms. Karen Carn
Division of Professional Regulations/Delaware Board of Examiners

FROM: Mr. Nick J. Fina, Ed.D. - Chairperson
State Council for Persons with Disabilities

RE: 22 DE Reg. 30 [DPR Board of Examiners of Speech/Language Pathologists, Audiologists & Hearing Aid Dispensers 3700 Regulation on Licensing Requirements (7/1/18)]

The Division of Professional Regulation/Delaware Board of Examiners of Speech/Language Pathologists & Hearing Aid Dispensers published the proposed regulation, which primarily updates clinical practicum and fellowship requirements to make them consistent with the American Speech Language Hearing Association ("ASHA") standards. This proposed regulation was published as 22 DE Reg. 30 in the Register of Regulations in the July 1, 2018 issue.

The SCPD has the following observations.

This proposed amendment to regulation under state law, SPLs and audiologists must meet ASHA standards for certification in order to be licensed. See 24 Del. Code §3708. For example, the minimum number of clinical practicum for graduate level was increased from 250 to 325 hours. The regulation more completely defines the Clinical Fellowship to be 36 weeks of full time work rather than defining it in months. Please see additional new requirements in §2.3.

There is a new requirement that audiologists and hearing aid dispensers inform clients of tele coil technology and provide them with written materials¹. (New Section 11) This change is required

¹ https://www.hearingloss.org/wp-content/uploads/HLAA_HAT_and_Telecoil.pdf?pdf=HatTelecoil

by 24 Del Code §3706(a) (amended in 2016).

There are also a number of mundane additions, including the requirement that licensed individuals keep their addresses updated. Finally, the regulations update the list of felonies that preclude licensure, to include accurate descriptions of drug-related offenses. The SCPD is endorsing these proposed amendments.

Thank you for your consideration and please contact SCPD if you have any questions or comments regarding our position on the proposed regulation.

cc: Mr. David Mangler, Director of Public Regulation
Ms. Laura Waterland, Esq.
Governor's Advisory Council for Exceptional Citizens
Developmental Disabilities Council

22reg30 dpr – board of examiners re licensing req for speech-language 7-20-187