

**TITLE 16. SPEECH-LANGUAGE PATHOLOGY AND AUDIOLOGY AND
HEARING AID DISPENSERS BOARD
DEPARTMENT OF CONSUMER AFFAIRS**

INITIAL STATEMENT OF REASONS

Hearing Date:

No public hearing has been scheduled for this proposed regulatory action.

Subject Matter of Proposed Regulations:

Speech-Language Pathology Assistant Supervision Requirements

Sections Affected:

Amend Sections 1399.170, 1399.170.2, 1399.170.15, 1399.170.16, 1399.170.17, and 1399.170.18 of Article 12 of Division 13.4 of Title 16, California Code of Regulations (CCR).¹

Background and Statement of the Problem:

The Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board (Board) is a state agency vested with the authority to license, regulate, and discipline within the practices of speech-language pathology, audiology, and hearing aid dispensing in accordance with the Business and Professions Code (BPC) sections 2530.1 and 2531.02. The Board's mandate and mission is to protect the public from approximately 35,000 licensed speech-language pathologists, speech-language pathology assistants (SLPAs), speech-language pathology aides, audiologists, dispensing audiologists, audiology aides, hearing aid dispensers, hearing aid dispenser trainees, and temporary hearing aid dispenser licensees. In order to protect the public, the Board set standards and requirements for support personnel supervised by speech-language pathologists (BPC sections 2530.6 and 2538.1.)

Existing law, under BPC section 2531.95, authorizes the Board to adopt or repeal regulations that may be necessary to execute any provisions of the Speech-Language Pathologists and Audiologists and Hearing Aid Dispensers Licensure Act. The Board intends to use this authority to amend the existing regulations on standards and requirements for SLPAs in CCR sections 1399.170, 1399.170.2, 1399.170.15, 1399.170.16, 1399.170.17, and 1399.170.18.

¹ All CCR references are to Title 16 unless otherwise noted.

There is no existing federal regulation or statute comparable to these proposed regulations.

This proposed regulation is necessary to allow for additional support personnel and clarify the requirements for supervising SLPAs while ensuring support personnel who are SLPAs are adequately trained and supervised. The current supervision requirements do not meet the needs of the public receiving services through electronic means or in various settings such as schools, medical or community-based facilities, and private practices. Support personnel are crucial because they help relieve speech-language pathologists (SLPs) from having to perform routine services, which allows SLPs to focus on advanced services in the areas of speech, language, swallowing, and voice disorders.

The SLPA license was first established in 1999 under Assembly Bill 205 (Machado, Chapter 1058, Statutes of 1998) which required the Board to adopt regulations to set SLPA standards and requirements. The Board promulgated regulations in 2001 and has made no major revisions to the SLPA regulations since that time.

In 2018, the Board approved revisions to allow for additional support personnel and the supervision requirements; but due to limited staff resources, the progress of the regulatory package was delayed until 2020. At its February 2020 meeting, the Board approved additional revisions to the SLPA supervision requirements. However, the progress of the regulatory package was delayed, due to changes in a different regulatory package that was approved by the Office of Administrative Law on June 29, 2021. The Board approved further revisions to this regulatory package at its August 2021 and May 2022 Board meetings.

Purpose, Rationale, and Anticipated Benefits from this regulatory action:

Amend section 1399.170 of Article 12 of Division 13.4 of the CCR

Purpose: Subsection (b) is amended to make changes within the definition of “client” to include the phrase “or other” between “school” and “setting.”

Anticipated Benefit/Rationale: Changes to subsection (b) are necessary because the practice of speech-language pathology also occurs in other settings such as medical or community-based facilities, and private practices.

Purpose: Subsection (c) is added and renumbered to include the definition for “immediate supervision” before renumbered subsection (d), which sets forth the definition of “direct supervision.”

Anticipated Benefit/Rationale: Moving the definition for “immediate supervision” to this location enhances clarity that this is the highest level of supervision.

Purpose: Subsection (c) is renumbered to be subsection (d) and subsection (e) is amended to clarify that indirect supervision provided through electronic means is “asynchronous” or not in real-time.

Anticipated Benefit/Rationale: Changes to the definition of “direct” and “indirect” supervision are necessary as it allows tele-supervision, which is when a SLPA supervisor can supervise through electronic means, and helps differentiate the two types of supervision from each other. During the COVID pandemic, SLPs were required to rely heavily on electronic means to provide services to their clients due to practice restrictions that were in place. Now that those restrictions are no longer in place, many SLPs have continued to provide services through electronic means as a convenient option for their clients to receive services. This, however, creates a problem for SLPAs who need their supervisor to be in the same location as they are to provide services that require direct supervision. To address this problem, the Board’s proposed regulation will allow for tele-supervision so long as it is direct supervision, which is when the SLPA supervisor can see and listen in real-time, or “synchronous audiovisual observation” and provide real-time guidance to the SLPA performing the duties that require direct supervision.

Purpose: Subsection (h) is amended to rearrange the levels of supervision.

Anticipated Benefit/Rationale: Changes to subsection (h) are necessary in order to enhance clarity that the highest level of supervision is “immediate” supervision and the lowest is “indirect” supervision.

Purpose: Subsection (j) is added to define “full-time equivalent” to mean at least thirty (30) hours per week.

Anticipated Benefit/Rationale: Changes to subsection (j) are necessary in order to allow the Board to use this term in multiple sections in Article 12 of Division 13.4 of Title 16, CCR without having to redefine it. The number of hours is consistent and aligns with the experience hours the Board has established for Required Professional Experience (RPE) temporary license holders (BPC section 2532.2.)

Amend section 1399.170.2 of Article 12 of Division 13.4 of the CCR

Purpose: Subsection (d) is added to require a supervisor to provide immediate supervision of all duties performed by a SLPA at least twenty (20) percent per week of the SLPA’s work schedule during the first ninety (90) days of work following initial licensure and maintain a record of completion in the SLPA’s personnel file.

Anticipated Benefit/Rationale: This change is necessary for consumer protection as it ensures adequate supervision for newly licensed SLPAs. By requiring a specified number of hours of in-person supervision during the first three months of licensure, this provides the supervisor the opportunity to provide in-person, real-time guidance on tasks the SLPA will perform in the setting in which they are working. A SLPA can perform their field work in many different settings than the one they are permanently employed in. Twenty (20) percent of scheduled work during the first ninety (90) days results in a reasonable number of hours and days because it won't unduly cause over-supervision of an already trained SLPA nor does it keep a SLP having to perform only routine services as a part of a SLPA's early training, thus keeping the SLP away from providing advanced services in the areas of speech, language, swallowing, and voice disorders. To ensure that a SLPA meets the requirements in subsection (d), the Board requires that the supervisor maintain a record of completion in the SLPA's personnel file, allowing the Board to request verification in the event it needs to investigate. The personnel file is a reasonable location as employers are required to have personnel records available for inspection upon request pursuant to the California Labor Code section 1198.5.

Amend section 1399.170.15 of Article 12 of Division 13.4 of the CCR

Purpose: Subsection (a) is amended to clarify the use of the term "supervisor" used in this section to mean the supervising speech-language pathologist and to remove language that already exists in regulations in subsection (b)(3) regarding the required supervision.

Anticipated Benefit/Rationale: Changes to subsection (a) reduce the need to repeatedly use a three-word phrase throughout this section of the regulations and are consistent with the writing and formatting style found in other parts of the regulations.

Purpose: Subsection (b) is amended to remove the Board's SLPA supervision form incorporated by reference and the related language.

Anticipated Benefit/Rationale: Changes to subsection (b) are necessary for clarity because the regulatory requirements being struck and the SLPA supervision form being incorporated by reference are out of date. A new application will be incorporated by reference in subsection (c). Subsection (b) is also amended for clarity to include the phrase "meet all the following requirements:" which denotes additional information to follow.

Purpose: Paragraph (1) of subsection (b) is amended to specify a valid license which, in addition to being current, is also active and unrestricted. This paragraph is also amended to add a credential type. Changes to paragraph (1) includes adding a two (2) year minimum experience prior to supervising a SLPA and defines "full-time" in this paragraph.

Anticipated Benefit/Rationale: The changes to paragraph (1) adding the requirements of an active and unrestricted license are necessary to ensure the SLPA supervisor has paid their license fee, is in good standing with their Continuing Professional Development requirements, and does not have any disciplinary actions that limit their ability to practice. The change specifying that SLPs can be credentialed either in a Clinical or Rehabilitative credential or Speech-Language Pathology credential is necessary because the California Commission on Teacher Credentialing has two service paths for SLPs to be credentialed. The changes requiring experience before supervision are necessary because these changes ensure that a SLPA supervisor is sufficiently skilled in the practice beyond their education and whatever experience they gained as a student or RPE temporary license holder. The Board finds that two (2) years of full-time experience is reasonable as this is the length of a renewal period for a SLP license. The definition of full-time is consistent and aligns with the experience hours this Board has for RPE temporary license holders. The other changes made include grammatical correction for the purpose of clarity and are consistent with the writing and formatting style found in other parts of the regulations.

Purpose: Paragraphs (2) of subsection (b) is amended to make a grammatical correction.

Anticipated Benefit/Rationale: The grammatical correction in paragraph (2) is consistent with the writing and formatting style found in other parts of the regulations and for the purpose of clarity.

Purpose: Paragraph (3) of subsection (b) is amended to make a grammatical correction and remove language that the SLPA supervisor shall monitor and evaluate the decisions of a SLPA.

Anticipated Benefit/Rationale: Changes to paragraph (3) are necessary as they are not consistent with statutory language that restricts SLPAs to only assist a SLP during assessments or follow and implement documented treatment plans or protocols (BPC section 2538.1(b)(4).) Changes to paragraph (3) also include grammatical corrections for clarity and replacing gendered terms, and are consistent with the writing and formatting style found in other parts of the regulations.

Purpose: Paragraph (4) is added to subsection (b) to require that a supervisor provide immediate supervision of all duties performed by a SLPA at least twenty (20) percent per week of the SLPA's work schedule during the first ninety (90) days of work following initial licensure and maintain a record of complying with this requirement in the SLPA's personnel file.

Anticipated Benefit/Rationale: Adding paragraph (4) is necessary to align with the new SLPA supervision requirement being added by this proposed regulation and is added

here for the same purpose and reasons stated in the discussion of the addition of subsection (d) to section 1399.170.2, above.

Purpose: Paragraph (4) of subsection (b) is renumbered to (5) and amended to require an SLP to complete training in supervision before supervising a SLPA and every four (4) years after those initial hours, along with grammatical corrections in this paragraph and in its subparagraphs (A) and (B).

Anticipated Benefit/Rationale: Because the field of management and supervision does not often change, the Board finds it reasonable to require an SLP to complete this training every four (4) years instead of two (2) years. All other changes to this paragraph, and its subparagraphs (A) and (B), are grammatical corrections for the purpose of clarity and are consistent with the writing and formatting style found in other parts of the regulations

Purpose: Paragraph (5) of subsection (b) is renumbered to (6), amended to specify that the course records to be maintained are the completion of the supervision training, and amended to make a grammatical correction.

Anticipated Benefit/Rationale: The changes are necessary to increase clarity in the recordkeeping required and are consistent with writing and formatting style found in other parts of the regulations.

Purpose: Paragraph (6) of subsection (b) is renumbered to (7) and amended to specify that SLPA supervisors are to review laws and regulations with their SLPA supervisees and make a grammatical correction.

Anticipated Benefit/Rationale: This is necessary as both SLPAs and SLPA supervisors need to know the current laws and regulations that maintain public safety. The grammatical corrections are for the purpose of clarity and are consistent with the writing and formatting style found in other parts of the regulations.

Purpose: Paragraph (7) of subsection (b) is renumbered to (8) and amended to require SLPA supervisor to develop a plan for the completion of the SLPA's continuing professional development requirements.

Anticipated Benefit/Rationale: This is necessary as the supervisors are responsible and accountable for services rendered by their SLPA. This can be enhanced when the supervisor can select coursework-related skills the SLPA needs to acquire that are appropriate to the practice setting they are in.

Purpose: Paragraph (8) of subsection (b) is renumbered to (9) and amended to specify that SLPA supervisors must provide SLPAs with a plan to handle emergencies.

Anticipated Benefit/Rationale: This is necessary as SLPAs will perform tasks on their own and will need to know how to properly respond in situations that disrupt or shut down the workplace, or could endanger clients, employees, or other members of the public.

Purpose: Paragraph (10) is added to subsection (b) to clarify that the SLPA supervisor is responsible for all services provided to clients by the SLPA.

Anticipated Benefit/Rationale: Adding this paragraph is required by BPC section 2538.1(b)(10), and is consistent and aligns with regulations regarding the supervision of Aides in CCR section 1399.154.2 and RPE temporary license holders in CCR section 1399.153.3.

Purpose: Paragraph (9) of subsection (b) is renumbered to subsection (c) and amended to incorporate a new supervision form that will replace the current form. Amendments were made to require the new form be submitted to the Board within thirty (30) business days from the start date of supervision and to require the SLPA be provided with a copy of the completed form within forty-five (45) business days from the start date of supervision.

Anticipated Benefit/Rationale: SLPs will use the new supervision form to attest that they know and understand their duties and responsibilities as a SLPA supervisor and submit to the Board within thirty (30) business days after the supervision begins. This is necessary to promote public safety. The Board can ensure all licensed SLPAs are adequately supervised by the forms submitted, and will be able to hold any SLPs responsible for services rendered by the SLPA they are supervising in accordance with BPC section 2538.1(b)(10). The Board determined that thirty (30) business days is reasonable because it allows SLPs sufficient time to designate a lead supervisor in the event a SLPA has more than one supervisor. The amendments also add the requirement that a completed copy of the form must be provided to the SLPA forty-five (45) business days after the supervision begins. This is necessary to equip SLPAs with evidence of the completed form in the event any dispute arises in connection with the supervision. The Board determined forty-five (45) business days is reasonable as this allows sufficient time for supervisors to provide SLPAs with these important documents related to their license in a timely manner.

Amend section 1399.170.16 of Article 12 of Division 13.4 of the CCR

Purpose: This section is amended to increase the number of full-time support personnel allowed, and sets out a maximum of six support personnel an SLP can supervise at a time.

Anticipated Benefit/Rationale: The change from two (2) SLPAs to three (3) full-time equivalent support personnel and not to exceed six (6) support personnel at any one time is necessary to alleviate the demand for additional support personnel in the practice of speech-language pathology. Support personnel are crucial because they help relieve a SLP from having to perform routine services which allows them to focus on advanced services in the areas of speech, language, swallowing, and voice disorders. The Board determined that increasing by one additional full-time support personnel is reasonable as it will not unduly burden the SLP's ability to manage their caseload and supervise three (3) to six (6) support personnel and, if applicable to their work setting, up to three (3) RPE temporary license holders. By requiring no more than six (6) support personnel at any one time, this prevents SLPs from supervising too many people. The Board believes it is a risk to public safety if support personnel are not adequately supervised. The "full-time equivalent" provides SLPs with the flexibility to configure their support personnel in such a way that an SLP could accommodate two (2) part-time personnel in place of one (1) full-time personnel. This is necessary because it is common for SLPAs and speech-language pathology aides to work part-time at multiple locations or work part-time while pursuing higher education for career advancement.

Amend section 1399.170.17 of Article 12 of Division 13.4 of the CCR

Purpose: This section is amended to eliminate gendered pronouns and incorporate a gender-neutral term and incorporate by reference the Responsibility Statement for Supervisors of a Speech-Language Pathology Assistant (77S-60, Rev. 5/22) form.

Anticipated Benefit/Rationale: These changes are based on Assembly Concurrent Resolution No. 260 of 2018 (ACR 260). In ACR 260, the Legislature resolved that "state agencies should ... use gender-neutral pronouns and avoid the use of gendered pronouns when drafting policies, regulations, and other guidance." This is a change without regulatory effect because the amendments are grammatical in nature. Regulations are being changed to remove gendered terms and replace these with gender-neutral terms throughout the state.

Amend section 1399.170.18 of Article 12 of Division 13.4 of the CCR

Purpose: This section is amended to require the SLPA supervisor to provide a copy of the supervision termination form to the SLPA within forty-five (45) business days of the termination of the supervision.

Anticipated Benefit/Rationale: This is necessary to equip SLPAs with evidence of the completed form in the event of any dispute regarding the termination of the supervision. The board determined that forty-five (45) business days is reasonable as this provides sufficient time for SLPs to provide their former supervisees with documents related to the supervisee SLPAs' licenses in a timely manner. This change aligns with the proposed

changes in section 1399.170.15(c)(1) regarding the supervision form and enhances transparency and accountability between the supervisor and SLPA.

**Form Incorporated by Reference “Responsibility Statement for Supervisors of a
Speech-Language Pathology Assistant” (77S-60, Rev. 5/22) in Section
1399.170.15(c)**

Letterhead

Purpose: A letterhead is being added that includes the Department of Consumer Affairs (DCA) logo; the agency’s name; the current Governor’s name; the Board’s address, phone number, and website; and the state seal.

Anticipated Benefit/Rationale: Adding the Board’s letterhead is necessary to better inform the person reading the form which entity is responsible for and requires this document. It is also common practice for businesses to use letterheads on documents or forms as it ensures the public receives a clear and professional image of the entity the document belongs to.

Title

Purpose and Anticipated Benefit/Rationale: The title of the form was not amended as it continues to accurately describe the content of the form.

Instructions

Purpose: The citation to CCR 1399.170.15 under the title is removed and replaced with instructions and information on relevant regulations and a statute. The instructions specify where to sign the form, when to submit the form, and to refrain from the use of whiteout or fax. The regulatory information provided specifies that CCR section 1399.170.15 requires this form be completed and submitted to the Board. It further specifies that the form is mandatory and will be used to determine compliance with CCR section 1399.170.15.

Anticipated Benefit/Rationale: The instructions and information about applicable regulations are necessary to remind the SLPA supervisor that the form must be signed and submitted to the Board within 30 days from the start date of supervision as required by section 1399.170.15. The instructions are also necessary to inform them to refrain from using whiteout or sending the form via fax because whiteout can cause confusion in determining if changes made to the form were authorized by the SLPA supervisor and the SLPA, and the Board does not have a fax machine to receive forms via fax. The Board’s mandate and mission is to protect the public and the supervision form provides the Board a means to ensure that all licensed SLPAs are adequately supervised. It also

promotes governmental transparency by keeping licensees informed of regulatory and legislative requirements intended to keep the public safe.

Part A

Purpose: Part A replaces the area where the SLPA's name and their number is provided. The SLPA information required in Part A will be the SLPA's full legal name, license number, address, and email.

Anticipated Benefit/Rationale: The information required in this section is necessary to allow the Board to associate the form with the license record using the name and license number provided. The Board will also be able to communicate and send correspondence to the location or email that will be readily available to the SLPA by obtaining an address and email on the form. Furthermore, the public will be advised of who supervises SLPAs through DCA's license search online database. The information provided in this section of the form will be available to the public and includes the licensee's name; license number; and the city, state and zip code from the address provided on the form.

Part B

Purpose: Part B replaces the area where the supervisor's name and their license or social security number is provided. The SLP information required in Part B will be the SLP's full legal name, license or credential number, address, and email. After Part B, regulatory information is provided to remind supervisors that their supervising responsibilities are covered in CCR section 1399.170.15.

Anticipated Benefit/Rationale: The information required in this section is necessary to allow the Board to associate the form with the license record using the name and license number provided. The Board will also be able to communicate and send correspondence to the address or email that is readily available to the SLP with the address and email provided on the form. Furthermore, the public will be able to determine who the SLP supervises through DCA's license search online database. The information provided in this section of the form will be available to the public and this includes the licensee's name; license number; and the city, state and zip code from the address provided on the form. Furthermore, the Board does not have jurisdiction over credentialed SLPs. With this information, the Board can collaborate with the California Department of Education and California's Commission on Teacher Credentialing to hold credentialed SLPs accountable for services rendered by any SLPA(s) they supervise. The information in Part B is necessary to promote governmental transparency and keeps licensees informed of the regulatory requirements.

Part C

Purpose: The multiple supervision statement in the existing form has been moved up from the end of form to become the first item of Part C. In addition to identifying if there are multiple supervisors and establishing who will be the lead supervisor in multiple supervision situations, Part C requires that the supervision start date be provided. After Part C, regulatory information is provided regarding the form being required by CCR section 1399.170.15.

Anticipated Benefit/Rationale: This is necessary because in order to maintain public safety the Board must be aware of when the SLPA will work in their licensed capacity and hold the SLP designated as the lead supervisor accountable for any SLPAs who are not in compliance with requirements to maintain their SLPA license. The information after Part C is necessary as it promotes governmental transparency and keeps licensees informed of regulatory requirements that keep the public safe.

Duties and Responsibilities of Speech-Language Pathology Assistant

Purpose: The section of the form where the SLPA prints, signs, and dates the form is moved from the end of the form to come after the regulatory information at the end of Part C. Included is a reproduction of section 1399.170.15(b)(7) which has been revised to become a statement made from the first-person point of view.

Anticipated Benefit/Rationale: Providing the regulatory requirement in this way is necessary to remind the SLPA supervisor to review with their SLPA(s) the laws and regulations related to the practice. This is efficient as the information is provided directly on the form that must be completed and submitted to the Board to begin the supervision. The Board seeks to create the form in a way that helps ensure compliance with this requirement when the SLPA prints, signs, and dates the form.

Duties and Responsibilities of Supervisor

Purpose: The section on the existing form beginning with: “As the supervisor:” and continuing to list thirteen (13) statements is replaced here with a reproduction of sections 1399.15, 1399.170.16, 1399.170.17, and 1399.170.18 as revised in this regulatory proposal and adapted to be statements made from the first-person point of view to be affirmed by the SLP. This portion of the form also includes a place for the SLPA supervisor to write their license or credential number with an instruction to provide a copy of the front and back of their credential.

Anticipated Benefit/Rationale: Providing the regulatory requirement in this way is necessary to remind the SLPA supervisor of all of the requirements related to their undertaking SLPA supervision. This is efficient as the information is provided directly on the form that must be completed and submitted to the Board to begin the supervision. The Board can ensure compliance with this requirement when the SLPA supervisor

prints, signs, and dates the form. Collecting the credential number and a copy of the front and back of the SLP's credential is necessary because the Board does not have jurisdiction or information on credentialed SLPs. With this information, the Board can collaborate with the California Department of Education and California's Commission on Teacher Credentialing to hold credentialed SLPs accountable for services rendered by any SLPA(s) they supervise.

Signature

Purpose: The Multiple Supervision Statement, the certification under penalty of perjury, and the area to collect names, signatures, dates, and the supervisor's address and phone number from the existing form are all removed.

Anticipated Benefit/Rationale: This is necessary as that information is captured in other parts of the revised form.

Notice

Purpose: The social security disclosure notice from the existing form is struck, and replaced with the Notice of collection of personal information. The notice provides an updated disclosure to the public how personal information that is collected may be used, an individual's right to access this information, and who to contact regarding the location of this information.

Anticipated Benefit/Rationale: Replacing the old social security disclosure notice with the more up-to-date Notice of collection of personal information brings the form into compliance with the laws regarding collection of personal information by a governmental entity. This is necessary because the Board no longer seeks or needs to collect social security numbers to serve as a unique identifier. All licensees have a license number that can serve as a unique identifier. This reduces the risk of identity theft on forms submitted to the Board in the event a form containing social security information is lost or stolen while in transit. The Notice regarding collection of personal information is required by the California Information Practices Act and the California Public Records Act.

Footer

Purpose: Each of the pages of this form includes the document number, revision date, and page number.

Anticipated Benefit/Rationale: This is necessary to distinguish this document from other documents provided by this Board and other Department of Consumer Affairs boards. It also informs the person using the form of the last time the Board reviewed and made

changes to the form, which page they are on within the form, and the total number of pages included in the form.

Underlying Data:

1. SLPAHADB Sunset Review Report 2012
2. May-June 2018 Board Meeting Agenda, relevant materials, and Minutes
3. February 2020 Board Meeting Agenda, relevant materials, and Minutes
4. August 2021 Board Meeting Agenda, relevant materials, and Minutes
5. May 2022 Board Meeting Agenda, relevant materials, and Minutes

Business Impact:

The Board has made the initial determination that the proposed regulatory action will not have a significant adverse economic impact on businesses or jobs. This initial determination is based on the fact that the Board is broadening SLPA supervision requirements to allow for additional support personnel and additional flexibility in supervising a number of support personnel.

The Board is not aware of any costs that businesses or individuals may incur to comply with these regulations over their lifetime, nor of any other economic costs that may occur. The Board is also not aware of any effect the proposed regulatory action will have on housing costs or impact to local agencies or federal funding to the state.

The Board is aware of benefits to businesses or individuals that may occur when complying with this regulation over its lifetime. The Board anticipates the public will experience increased access to SLP advanced services as SLPs are relieved from routine services their supervisees can provide. The public will also benefit from the higher level of supervision during a SLPA's initial 90 days of licensure and more convenient access to care through electronic means. These types of benefits are unquantifiable and cannot be easily measured or estimated. The Board cannot provide more specific information on potential statewide benefits that may occur from these regulations over their lifetime.

Because the Board's authority is over licensees and not over all businesses within the industries the Board regulates, the Board cannot provide any estimates for the total number or types of businesses that may be impacted, as the Board does not maintain data on the types of business (e.g., private, nonprofit, public, or small business) the various license types participate in or are employed by.

The Board anticipates over 23,000 SLPs and 5,000 SLPAs in various settings such as schools, medical or community-based facilities, and private practices will be impacted by these proposed regulations.

The Board notes, licensees are currently required to notify and register as SLPA supervisors, as specified. The proposed regulatory requirements, including submitting

the SLPA supervision form, are not anticipated to result in additional workload or costs to licensees.

Fiscal Impact:

The Board anticipates approximately 6,700 SLPA supervision forms will be submitted in year one of implementation with modest growth annually thereafter. Each SLPA supervision form will take approximately 5 minutes to process at an estimated cost of \$4.50 each.

The Board estimates increased workload and costs ranging from approximately \$30,000 to \$82,000 per year and up to \$522,000 over a ten-year period as follows:

Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board SLPA Supervision - Fiscal Impact													
Institution Type	Forms Per Year	Min Per Form	Costs Per Form*	Years Ongoing									
				1	2	3	4	5	6	7	8	9	10
SLPA Supervision Forms	Various	5	\$4.50	\$30,244	\$33,768	\$37,702	\$42,095	\$47,000	\$52,477	\$58,591	\$65,418	\$73,041	\$81,552
Total Costs:				\$30,244	\$33,768	\$37,702	\$42,095	\$47,000	\$52,477	\$58,591	\$65,418	\$73,041	\$81,552

SLPA - Speech-Language Pathology Assistants

*Includes 3 percent increase in Yr 2 and ongoing

The Board indicates any additional workload and costs will be absorbed within existing resources, but the Board may need to request additional resources through the annual budget process in the future.

The Board notes, the SLPA supervisor form was updated within normal business operations and did not result in increased workload or costs.

The regulations do not result in costs or savings in federal funding to the state.

Economic Impact Assessment:

This regulatory proposal will have the following effects:

It may create new businesses or jobs within the State of California because the proposed regulatory action broadens and incorporates flexibility into SLPA supervision requirements, and thus may enhance industry growth within the industries this Board regulates.

It will not eliminate existing businesses or jobs because the proposed regulatory action broadens and incorporates flexibility into SLPA supervision requirements, and thus does not inhibit industry growth within the industries this Board regulates.

It may expand existing businesses within the state of because the proposed regulatory action broadens and incorporates flexibility into SLPA supervision requirements, and thus may enhance industry growth within the industries this Board regulates.

It may affect the health and welfare of California residents. The proposed regulatory action broadens and incorporates flexibility into SLPA supervision requirements and may increase access to advanced services as SLPs are relieved from routine services that could be performed by a SLPA. The public will also benefit from the higher level of supervision during a SLPA's initial licensure and more convenient access to care through electronic means.

It will not affect worker safety because the proposed regulatory action broadens SLPA supervision requirements and does not directly concern or impact worker safety.

It will not affect the state's environment because the proposed regulatory action broadens SLPA supervision requirements and does not concern or impact the state's environment.

Specific Technologies or Equipment:

This regulatory proposal does not mandate the use of specific technologies or equipment.

Consideration of Alternatives:

The Board's initial determination is that there is no reasonable alternative to the proposed regulatory action which would be more effective in carrying out the purpose for which the action is proposed or would be as effective or less burdensome to affected private persons, and equally effective in achieving the purposes of the regulation in a manner that ensures full compliance with the law being implemented or made specific.

No such alternatives have been proposed, however, and the Board welcomes comments from the public.