



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

February 6, 2009

Joint Committee on Public Health
Connecticut General Assembly
Room 3000, Legislative Office Building
Hartford, CT 06106

Dear Committee Members:

On behalf of the American Speech-Language-Hearing Association (ASHA), I submit these comments in opposition to House Bill 6265, which changes the scope of practice for speech-language pathologists (SLPs) by replacing the term *diagnosis* with *evaluation* in their scope of practice. ASHA is the professional, credentialing and scientific organization that represents more than 130,000 audiologists, speech-language pathologists, and speech, language and hearing scientists.

Diagnosis vs. Evaluation

The terms *diagnosis* and *evaluation* are not synonymous. *Diagnosis* refers to the assignment of a disease category label that results in eligibility for services and/or insurance coverage, as well as the categorization and determination of the cause of a particular state. The term is not limited to a particular profession. *Assessment/evaluation* refers to the detailed description of the character of the individual's disability.

ASHA's scope of practice for SLPs includes both *diagnosis* and *assessment/evaluation*. Furthermore, comprehensive speech-language assessments, conducted by appropriately credentialed and trained SLPs, include diagnosis of a speech, language, cognitive-communication and/or swallowing disorder. [See www.asha.org/policy for Preferred Practice Patterns for the Profession of Speech-Language Pathology and Roles of speech-language pathologists in the identification, diagnosis, and treatment of individuals with cognitive-communication disorders: Position statement]. In addition, New Hampshire, Pennsylvania, Maine, Massachusetts, and Vermont include the term *diagnosis* or *diagnosing* in their SLP scope of practice.

Training and Qualifications

A medical diagnosis and a speech-language diagnosis are vastly different. A physician diagnoses a medical condition; an SLP diagnoses the communication disorder that may be the result of the medical condition. By virtue of education and training, SLPs are independent practitioners who are uniquely qualified to diagnose and treat a wide range of communication disorders, most of which are not the result of a medical diagnosis. SLPs are also trained to refer suspected medical complications to the appropriate physician. In some cases, SLPs collaborate with physicians in the use of medical procedures to diagnose communication or swallowing disorders.

IDEA Mandate

Most pediatric speech and language diagnostics in Connecticut are completed under the umbrella of the federal Individuals with Disabilities Education Act. Under Section 300.34 (15) of IDEA Part B regulations, speech-language pathology includes "appraisal and diagnosis of specific speech and/or language impairments." Therefore, Connecticut law should remain consistent with this federal definition.

2200 RESEARCH BLVD
ROCKVILLE, MD 20850-3289
301-296-5700 VOICE or TTY
FAX 301-296-8577

www.asha.org

444 N. CAPITOL ST., NW
SUITE 715
WASHINGTON, DC 20001
FAX 202-624-5955

Coding and Reimbursement

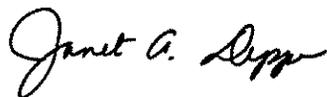
In their role as healthcare professionals, SLPs are required to determine and assign speech and/or language diagnoses through coding, which determines the nature of the communication diagnosis that is put on an insurance claim. Physicians do not have the training in speech-language pathology to conduct speech-language assessments or distinguish between the various types of disorders. Without a specific diagnosis, insurance reviewers cannot determine whether the treatment was appropriate. If SLPs cannot provide these diagnoses, the accuracy and timeliness of processing insurance claims would be severely affected.

Consumer Issues

The inability of SLPs to diagnose their clients' communication disorders could potentially result in Connecticut's citizens having difficulty receiving necessary services and will likely create disruptions in the vital services SLPs provide. Therefore, ASHA strongly urges the committee to reject this change to Connecticut's SLP scope of practice and vote against House Bill 6265 if and when it comes before the committee for vote.

Thank you for the opportunity to submit comments. Should you have any questions or need further information, please contact Rend Al-Mondhiry at ral-mondhiry@asha.org or by phone at 301-296-5665.

Sincerely,



Janet Deppe
Director of State Advocacy