



**Michigan Speech-Language-Hearing Association**  
Assistance, Awareness & Advocacy in Communication Sciences & Disorders

TO: Adriena Krul-Hall  
[krulhalla@michigan.gov](mailto:krulhalla@michigan.gov)

Date: August 13, 2024

Re: Comments on Proposed Policy: Project Number 2420-Therapy, Updates to Speech-Language Pathologist Enrollment

Dear Ms. Krul-Hall:

The Michigan Speech-Language-Hearing Association (MSHA) submits the following comments regarding the above-referenced proposed policy. The proposed policy would update Medicaid enrollment requirements for licensed speech-language pathologists (SLPs) in the State of Michigan, who would no longer be required to hold the American Speech-Language-Hearing Association (ASHA) Certificate of Clinical Competence (CCC) to bill for Medicaid services.

Currently, Michigan Medicaid policy stipulates that SLPs who are billing Medicaid in outpatient clinical settings and nursing facilities must hold their CCC credentials; however, this is not required for SLPs billing Medicaid for school-based services.

The ASHA CCC is a nationally recognized professional credential, indicating that the SLP has voluntarily met academic and professional standards through active engagement in ongoing professional development, as well as abiding by ASHA's Code of Ethics.

The proposed policy states that "CCC-SLP and Michigan licensure are identical in education, post-graduate clinical experience, examination, and continuing education requirements creating redundancy in enrollment requirements and professional fees for SLPs."

It is accurate that CCC-SLP and Michigan licensure are identical in education, post-graduate clinical experience, and examination.

**Requirements for ASHA CCC:**

- Master's or doctoral degree from an accredited educational programs that meets standards set by the Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA)
- Complete 1,260 hours of supervised postgraduate clinical experience (the Clinical Fellowship; supervised by a CCC-SLP)

- Pass the Praxis Series II Test in Speech-Language Pathology

**Requirements for full licensure as an SLP in MI:**

- Verification of current ASHA certification (CCC)  
*or*
- Master's or doctoral degree from an accredited educational programs that meets standards set by the Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA)
- Complete 1,260 hours of supervised postgraduate clinical experience (via the educational limited license; supervised by a MI licensed SLP)
- Pass the Praxis Series II Test in Speech-Language Pathology

Another important consideration relates to the supervised post-graduate clinical experience. For new graduates who are pursuing their CCCs, only SLPs with their CCCs can supervise SLPs completing their supervised clinical fellowship. Additionally, only SLPs with their CCCs can supervise and mentor graduate students during their internships/externships through an accredited education program.

However, there are differences in CCC-SLP and Michigan licensure as it relates to continuing education requirements. To maintain CCC-SLP status, SLPs must obtain and report thirty (30) professional development hours every 3-year certification cycle. Michigan licensure requires that SLPs obtain and report twenty (20) professional development credits every 2-year cycle. [This infographic](#) provides further details on continuing education requirements for CCC maintenance and state of Michigan licensure renewal.

We hope this provides additional inputs needed for you to make a determination and are happy to engage in a conversation to discuss the value of the CCC for SLPs in the state of Michigan.

Sincerely,

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