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Council of Academic Programs in Communication Sciences and Disorders  
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## From the CAPCSD Board of Directors

**Date:** June 30, 2025

**To:** Council for Clinical Certification in Audiology and Speech-Language Pathology (CFCC)

**CC:** Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA) Board of Directors

**From:** Council of Academic Programs in Communication Sciences and Disorders (CAPCSD) Board of Directors

**RE:** Proposed Modifications to ASHA Certification Standards

Dear CFCC Members,

The CAPCSD Board of Directors respectfully submits this formal response to the proposed modifications to the 2020 Audiology Certification Standards and 2020 Speech-Language Pathology Certification Standards as outlined in your recent announcement.

## CAPCSD's Position and Commitment

CAPCSD represents academic programs across the nation that are dedicated to preparing the next generation of speech-language pathologists and audiologists. Our organization maintains an unwavering commitment to diversity, equity, inclusion, and belonging (DEIB), as formalized in our CAPCSD DEIB Statement, which commits us to "dismantling systemic racism, discrimination, elitism, and oppression" and supporting programs in recruiting students and colleagues who represent the diversity of our communities and populations served.

This commitment is integral to our core organizational values of Excellence, Visionary Leadership, and Collaboration. We believe that preparing culturally responsive practitioners is not optional but essential to clinical excellence and professional competence.

## Understanding the Legal Context

We acknowledge the complex legal environment created by recent federal executive orders and the resulting scrutiny of terminology related to cultural competency, diversity, equity, and inclusion. We understand CFCC's responsibility to protect the integrity and longevity of ASHA's certification programs while ensuring continued access to certification for current and future practitioners.

However, we are concerned that the proposed modifications may inadvertently weaken the profession's commitment to preparing practitioners who can effectively serve increasingly diverse populations and address documented health disparities in communication disorders.

## Specific Concerns About Proposed Changes

**Terminology Modifications:** While we understand the rationale for changing specific terminology, we are concerned that replacing "cultural competency, cultural humility, culturally responsive practice, or DEI" with "person-centered care and/or professional interactions" may dilute the specific focus on cultural responsiveness that is essential for effective clinical practice.

**Educational Alignment:** Academic programs rely on clear certification standards to guide curriculum development. The proposed changes create potential misalignment between what programs teach (based on accreditation standards) and what practitioners need for certification maintenance, potentially confusing students and faculty.

**Professional Development Requirements:** The modification of continuing education requirements from specific cultural competency focus to broader "professional interactions" may result in practitioners receiving less targeted preparation for serving diverse populations.

## Recommendations

We respectfully urge the CFCC to consider approaches that balance legal compliance with educational and professional imperatives:

1. **Explore alternative language** that preserves the intent and substance of cultural competency requirements while addressing legal concerns
2. **Maintain substance over semantics** by ensuring that whatever terminology is used, the underlying educational and professional development objectives remain intact
3. **Coordinate with CAA** to ensure alignment between accreditation and certification standards, providing clarity for academic programs

4. **Consider implementation guidance** that helps academic programs and practitioners understand how to maintain focus on cultural responsiveness within the new framework
5. **Engage stakeholders broadly** in developing creative solutions that satisfy both legal requirements and professional obligations

## Our Professional Imperative

The populations served by our graduates are increasingly diverse, and health disparities affecting communication disorders disproportionately impact marginalized communities. Our profession has a responsibility to prepare practitioners who can serve all members of society with competence and cultural humility. Any modifications to standards should preserve this essential professional obligation.

## Commitment to Collaboration

CAPCSD remains committed to supporting our member programs and working collaboratively with ASHA's governance bodies to navigate these challenging times. We believe that creative solutions exist that can satisfy both legal requirements and educational imperatives, and we stand ready to collaborate in developing approaches that preserve the essential elements of quality education and professional development in our field.

We appreciate CFCC's dedication to protecting ASHA certification and understand the difficult decisions being made. We hope our perspective as educators can contribute to solutions that maintain both legal compliance and professional excellence.

Thank you for your consideration of these important matters. We look forward to continued dialogue and collaboration.

Respectfully submitted,

CAPCSD Board of Directors