

DEPARTMENT OF CONSUMER AFFAIRS
TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS
DIVISION 13.4
SPEECH-LANGUAGE PATHOLOGY AND AUDIOLOGY
AND HEARING AID DISPENSERS BOARD

NOTICE OF PROPOSED REGULATORY ACTION CONCERNING:
Audiology Supervised Clinical Experience

NOTICE IS HEREBY GIVEN that the Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board (hereafter Board) is proposing to take the action described in the Informative Digest below, after considering all comments, objections, and recommendations regarding the proposed action.

PUBLIC HEARING

The Board has not scheduled a public hearing on this proposed action. However, the Board will hold a hearing if it receives a written request for a public hearing from any interested person, or their authorized representative, no later than 15 days prior to the close of the written comment period. A hearing may be requested by making such request in writing addressed to the individuals listed under “Contact Person” in this Notice.

WRITTEN COMMENT PERIOD

Written comments relevant to the action proposed, including those sent by mail or e-mail to the addresses listed under “Contact Person” in this Notice, must be **received by the Board at its office no later than by Tuesday, June 17, 2025**, or must be received by the Board at the hearing, should one be scheduled.

AUTHORITY AND REFERENCE

Pursuant to the authority vested by section 2531.95, of the Business and Professions Code (BPC), and to implement, interpret, or make specific BPC sections 2532.2 and 2532.25, the Board is considering amending section 1399.152.2 of title 16 of the California Code of Regulations (CCR).¹

INFORMATIVE DIGEST / POLICY STATEMENT OVERVIEW

Summary of Existing Laws and Effect of the Proposed Action

The Board is a state agency vested with the authority to license, regulate, and discipline

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

within the practices of speech-language pathology, audiology, and hearing aid dispensing in accordance with the Speech-Language Pathologists and Audiologists and Hearing Aid Dispensers Licensure Act (commencing with section 2530 of Division 2 of the BPC) (Practice Act). As part of the Board's mandate and mission to protect the public, the Board oversees approximately 38,000 licensed or registered speech-language pathologists, speech-language pathology assistants, speech-language pathology aides, audiologists, dispensing audiologists, audiology aides, hearing aid dispensers, hearing aid dispenser trainees, temporary hearing aid dispensers, and continuing professional development providers.

Existing law under BPC section 2531.95 authorizes the Board to establish necessary rules and regulations for enforcement of the Practice Act and the laws subject to its jurisdiction. With this rulemaking, the Board seeks to clarify the supervised clinical experience requirements for applicants of a speech-language pathology license and audiology license, add licensing dispensing audiologist to the list of those who can provide supervision of audiology clinical experience because the license type was added after the regulations were originally promulgated, and clarify the terms "supervised clinical practice" or "clinical practice" as used in Sections 2532.2 and 2532.25 of the Code.²

There is no existing federal regulation or statute comparable to this proposed rulemaking.

Applicants seeking licensure as an audiologist must "[s]ubmit evidence of the satisfactory completion of supervised clinical practice with individuals representative of a wide spectrum of ages and audiological disorders" (BPC sections 2532.2 (b)(1) and 2532.25 (b)(1)). Prior to 2009, the entry level licensing requirements for audiologists was at least a master's degree, although applicants were not precluded from earning the more advanced doctoral degree in audiology. Before and after the entry level licensing requirements for audiologists was changed, BPC section 2532.2 requires the Board to establish by regulation the required number of clock hours of supervised clinical practice necessary for audiology applicants. CCR section 1399.152.2 make specific BPC section 2532.2 by stating the number of clock hours of supervised clinical experience required for licensure as an audiologist.

In 2009, the Legislature passed Senate Bill (SB) 821 (Committee on Business, Professions and Economic Development; Chapter 307, Statutes of 2009) changing the entry level licensing requirements for audiologists from at least a master's degree to a doctoral degree to reflect updated industry and educational standards. As a result, BPC section 2532.25 was adopted, which applies to applicants who graduated from an approved educational institution on or after January 1, 2008, and BPC section 2532.2 was amended to apply to applicants who graduated from an approved educational

² As used herein, the terms "supervised clinical practice," "clinical practice," "supervised clinical experience," and "clinical experience" are synonymous and used interchangeably, consistent with BPC sections 2532.2 and 2532.25 and CCR section 1399.152.2.

institution on or before December 31, 2007. Similar to BPC section 2532.2, BPC section 2532.25 requires the Board to establish by regulation the required number of clock hours of supervised clinical practice necessary for an applicant seeking licensure as an audiologist. However, regulations were not promulgated to specifically state the number of clock hours of supervised clinical practice required for audiology licensure applicants who have completed an audiology doctoral program due to limited staff resources.

Following discussions of the Board's Audiology Practice Committee, the Board at its meeting on December 1, 2023 concluded that it remained appropriate to require applicants who completed an audiology doctoral program on or after January 1, 2008 to complete three hundred (300) clock hours of supervised clinical practice, the same number of clock hours required for applicants who completed at least a master's degree on or before December 31, 2007.

This proposal will amend CCR section 1399.152.2 as follows:

1. Adopt subsection (a)

This proposal adds this subsection to state that “supervised clinical experience,” “clinical experience” or “clinical practicum” will have the same meaning and effect as the terms “supervised clinical practice” or “clinical practice” as used in BPC sections 2532.2 and 2532.25. This is for clarity and to eliminate confusion.

2. Amend subsection (a) and re-letter to subsection (b)

This proposal re-letters subsection (a) to subsection (b). This proposal also amends this subsection by deleting cross reference to BPC section 2532.2, subdivision (c) and creating subparagraphs (1), (2), and (3) from pre-existing text. Subparagraph (1) contains pre-existing text that specifies who can supervise clinical experience in the practice of speech-language pathology. Subparagraph (2) contains pre-existing text that specifies who can supervise clinical experience in the practice of audiology and is amended to add a “licensed dispensing audiologist” as someone who can provide said supervision. Subparagraph (3) contains pre-existing text defining “qualifications deemed equivalent by the Board” and is amended to replace the word “includes” with the phrase “as used in this section means.” These changes are to keep consistency and to maintain the writing structure following the adoption of subsection (a) as part of this regulatory proposal, as discussed in paragraph 1. It also improves readability and aligns the regulations with licenses the Board issues to those who are statutorily authorized to practice audiology.

3. Amend subsection (b) and re-letter to subsection (c)

This proposal re-letters subsection (b) to become subsection (c). This proposal also amends this subsection to begin with the phrase “A total of.” This is to keep consistency and to maintain the writing structure following the adoption of subsection (a) as part of

this regulatory proposal, as discussed in paragraph 1. It also improves readability and aligns with the writing style used in this proposed rulemaking.

4. Amend subsection (c) and re-letter to subsection (d)

This proposal re-letters subsection (c) to subsection (d). This proposal also amends this subsection to begin with the phrase “A total of,” replace the word “in” with the word “across” in front of the phrase “three (3) different clinical settings,” and remove reference to audiology applicants from this subsection. This proposal also seeks to replace the phrase “after December 31, 1992” with “on or after January 1, 1993.” This is to keep consistency and to maintain the writing structure following the adoption of a subsection as part of this regulatory proposal as discussed in paragraph 1. It also increases clarity of the licensing requirements for speech-language pathologist and maintains consistency in writing style use throughout the regulatory text.

5. Adopt subsections (e)

This proposal adds subsection (e) to specify the total number of clock hours of supervised clinical practice required for applicants who completed an audiology graduate program on or after January 1, 1993 is three hundred (300) clinical clock hours across three (3) different clinical settings. This makes it easier to understand and make clear what the entry level licensing requirements for audiologists prior to and following the passing of SB 821. It also makes accommodating future amendments to clock hour requirements easier in the event the Board ever deems it necessary to change the required clock hours for licensed audiologists in the future.

6. Re-letter subsection (d) to subsection (f)

This proposal re-letters subsection (d) to subsection (f) and re-letters the reference to subsection (a) to subsection (b). This is to maintain consistency and the writing structure following the adoption of subsections as part of this regulatory proposal as discussed in paragraphs 1 and 5.

7. Amend the Note

This proposal amends the reference of the note to include BPC section 2532.25. This reflects statutory changes to the Practice Act. BPC section 2532.25, which was adopted after the passing of SB 821, changed the entry level licensing requirements for audiologists from at least a master’s degree to a doctoral degree.

Anticipated Benefits of Proposal

The Board has determined that this regulatory proposal will have the following benefits to the health and welfare of California residents:

This regulatory proposal will affect the health and welfare of California residents. California residents will benefit from audiologists who are adequately prepared to treat the public under current industry standards. Businesses and individuals will also benefit from increased clarity of the Board's audiology licensing requirements.

Evaluation of Consistency and Compatibility with Existing State Regulations

During the process of developing this regulatory proposal, the Board has conducted a search of any similar regulations on these topics and has concluded that these regulations are neither inconsistent nor incompatible with existing state regulations.

INCORPORATION BY REFERENCE: None.

DISCLOSURES REGARDING THIS PROPOSED ACTION

FISCAL IMPACT ESTIMATES

Fiscal Impact on Public Agencies Including Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State:

The regulations do not result in a fiscal impact to the state. The Board does not anticipate additional workload or costs resulting from the proposed regulations.

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

Nondiscretionary Costs/Savings to Local Agencies: None.

Cost to any Local Agency or School District for which Government Code Sections 17500 - 17630 Require Reimbursement: None.

Mandate Imposed on Local Agencies or School Districts: None.

Significant Effect on Housing Costs (and, if applicable, including any estimated costs of compliance or potential benefits of a building standard): None.

BUSINESS IMPACT ESTIMATES

The Board has made the initial determination that the proposed regulatory action would have no significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states.

This initial determination is based on the fact that this regulatory proposal clarifies current licensing requirements, and it does not enhance or inhibit industry growth within the industries the Board regulates.

Cost Impact on Representative Private Person or Business

The Board is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

RESULTS OF ECONOMIC IMPACT ASSESSMENT / ANALYSIS

Impact on Jobs / Businesses

The Board has determined that this regulatory proposal will not have any impact on the following:

- 1) the creation or elimination of jobs within the state,
- 2) the creation of new businesses or the elimination of existing businesses within the state, or,
- 3) the expansion of businesses currently doing business within the state.

This proposal would not have any of the above-referenced impacts as explained in the “Business Impact Estimates” section of this notice.

Benefits of Regulation:

The Board has determined that this regulatory proposal will have the following benefits to the health and welfare of California residents:

California residents will benefit from audiologist who are adequately prepared to treat the public under current industry standards. Businesses and individuals will also benefit from an increased clarity of the Board’s audiology licensing requirements.

This type of benefit is unquantifiable and cannot be easily measured or estimated. Therefore, the Board cannot provide information on possible statewide benefits that may occur from this regulation over its 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 type of businesses (e.g., private, nonprofit, public, or small business) that will benefit from this proposed regulation. The Board anticipates over one hundred (100) individuals applying for licensure in the practice of audiology will benefit from this proposed regulation.

This regulatory proposal does not affect worker safety because this regulatory proposal clarifies current licensing requirements and does not involve worker safety.

This regulatory proposal does not affect the state's environment because this regulatory proposal clarifies current licensing requirements and does not concern or impact the State's environment.

Business Reporting Requirements

The regulatory action does not require businesses to file a report with the Board.

Effect on Small Business

The Board has determined that the proposed regulations will not affect small businesses. Although small businesses owned by licensees of the Board may be impacted, the Board does not maintain data relating to the number or percentage of licensees who own a small business; therefore, the number or percentage of small businesses that may be impacted cannot be predicted. This initial determination is based on the fact that this regulatory proposal clarifies current licensing requirements, and it does not enhance or inhibit industry growth within the industries the Board regulates.

CONSIDERATION OF ALTERNATIVES

In accordance with Government Code section 11346.5, subdivision (a)(13), the Board must determine that no reasonable alternative it considered to the regulation or that has otherwise been identified and brought to its attention would be more effective in carrying out the purpose for which the action is proposed; would be as effective and less burdensome to affected private persons than the proposal described in this Notice; or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

Any interested person may submit comments to the Board in writing relevant to the above determinations at 1601 Response Road, Suite 260 Sacramento, CA 95815 during the written comment period, or at the hearing if one is scheduled or requested.

AVAILABILITY OF STATEMENT OF REASONS AND RULEMAKING FILE

The Board has compiled a record for this regulatory action, which includes the Initial Statement of Reasons (ISOR), proposed regulatory text, and all the information on which this proposal is based. This material is contained in the rulemaking file and is available for public inspection upon request to the Contact Persons named in this Notice.

TEXT OF PROPOSAL

Copies of the exact language of the proposed regulations, and any document incorporated by reference, and of the initial statement of reasons, and all of the information upon which the proposal is based, may be obtained upon request from the Board, at 1601 Response Road, Suite 260 Sacramento, CA 95815.

AVAILABILITY OF CHANGED OR MODIFIED TEXT

After considering all timely and relevant comments, the Board, upon its own motion or at the request of any interested party, may thereafter adopt the proposals substantially as described below or may modify such proposals if such modifications are sufficiently related to the original text. With the exception of technical or grammatical changes, the full text of any modified proposal, with the modifications clearly indicated, will be available for review and written comment for 15 days prior to its adoption from the persons designated in this Notice as the Contact Person and will be mailed to those persons who submit written comments or oral testimony related to this proposal or who have requested notification of any changes to the proposal.

AVAILABILITY AND LOCATION OF THE FINAL STATEMENT OF REASONS AND RULEMAKING FILE

All the information upon which the proposed regulations are based is contained in the rulemaking file which is available for public inspection by contacting the person named below.

You may obtain a copy of the Final Statement of Reasons once it has been prepared by making a written request to the Contact Person named below or by accessing the website listed below.

CONTACT PERSONS

Inquiries or comments concerning the proposed rulemaking action may be addressed to:

Name:	Maria Liranzo; Legislation, Regulations, and Budget Analyst
Address:	Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board 1601 Response Road, Suite 260 Sacramento, CA 95815
Telephone No.:	(916) 287-7915
E-Mail Address:	SpeechandHearingRegulations@dca.ca.gov

The backup contact person is:

Name:	Cherise Burns, Executive Officer
Address:	Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board

1601 Response Road, Suite 260 Sacramento, CA 95815
Telephone No.: (916) 287-7915
E-Mail Address: SpeechandHearingRegulations@dca.ca.gov

AVAILABILITY OF DOCUMENTS ON THE INTERNET

Copies of the Notice of Proposed Action, the Initial Statement of Reasons, and the text of the regulations with modifications noted, as well as the Final Statement of Reasons when completed, and modified text ,if any, can be accessed through the Board's website at

https://www.speechandhearing.ca.gov/board_activity/lawsregs/proposed_regulations.shtml.