

December 29, 2025

Tomiquia Moss, Secretary
California Business, Consumer Services and Housing Agency
500 Capitol Mall, Suite 1850
Sacramento, CA 95814

Dear Secretary Tomiquia Moss,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2025.

Should you have any questions please contact Michael Magat, Assistant Executive Officer, at (916) 905-5452, Michael.Magat@dca.ca.gov.

GOVERNANCE

Mission and Strategic Plan

The Board's mission is to protect the people of California by promoting standards and enforcing the laws and regulations that ensure the qualifications and competence of providers of speech-language pathology, audiology, and hearing aid dispensing services.

The Board's Strategic Goals are as follows:

Goal 1: Licensing: The Board's licensing standards protect consumers while permitting reasonable access into the professions.

Goal 2: Enforcement: The Board protects consumers through the active enforcement of the laws and regulations governing the practices of speech-language pathology, audiology, and hearing aid dispensing.

Goal 3: Outreach and Communications: The Board educates and informs consumers and other stakeholders about the practices and laws and regulations governing the professions of speech-language pathology, audiology, and hearing aid dispensing.

Goal 4: Laws and Regulations: The Board protects California consumers by the laws and regulations governing the speech-language pathology, audiology, and hearing aid dispensing professions.

Goal 5: Board Administration: The Board is committed to efficiently and effectively utilizing resources and personnel to meet its goals and objectives.

Control Environment

The Board establishes an effective control environment through the use of various accountability and reporting mechanisms and administrative controls. Examples of Board controls are as follows:

- The Board has a reporting structure that includes the Department of Consumer Affairs (DCA) and the Business, Consumer Services, and Housing Agency (BCSH).
- The Board has established a Board Member manual for issuance to new
- The Board's Executive Officer (EO) reports at least quarterly to the Board on the performance and operations of Board units and the EO is held accountable through annual performance evaluations.
- The Board's EO and Assistant Executive Officer (AEO) keep Board staff accountable for the performance of the Board's work through individual and unit level measures.
- The Board's organizational structure consists of three separate units: administration, enforcement, and licensing and examinations. The Board is staffed by a Staff Services Manager I (SSM I) reporting directly to the EO and who serves as the AEO. The Board has one Special Investigator reporting directly to the EO and serves as the Enforcement Unit lead. The remaining staff, report directly to the The clerical staff in the Administration Unit report to the lead Licensing Unit coordinator and the Policy staff report directly to the AEO.
- Office guidelines and employee expectations are read and agreed to by The Board follows established human resources protocols and best practices when recruiting, selecting, and hiring staff. Staff attend relevant training classes to their job positions and are encouraged to attend additional training that interests them.

Information and Communication

Internally, the Board has unit meetings at least bi-monthly where the units examine their processes and make recommendations to enhance the programs' workflow and the customer service that they deliver. At least on a quarterly basis, an all-staff meeting is held with management and feedback is solicited on the operations of the three programs: administration, enforcement, and licensing and examinations.

Externally, the EO conducts outreach efforts with the three professional organizations associated with the Board's licensed occupations. The Board utilizes targeted email listservs to distribute relevant information, such as for Board meetings, changes within the Board's laws and regulations, and enforcement actions taken by the Board. The Board conducts its quarterly Board meetings in various locations across the state and whenever possible, utilizes online meeting platforms that provide for greater participation from a more diverse group of

participants. Meetings are also webcast whenever possible; both online meeting platforms and webcast include live captioning for participants with impaired hearing.

MONITORING

The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Cherise Burns, Executive Officer.

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Program assessment is routine and ongoing, providing almost continuous opportunity for program improvement as vulnerabilities are identified. As vulnerabilities are identified, appropriate staff is assigned to ameliorate the vulnerability. Examples of monitoring of internal controls include:

- Management conducts one-on-one and unit meetings with staff to identify programmatic problems to enable management to respond to
- Management performs ongoing reviews of completed staff work and quarterly reviews of performance measures in both licensing and enforcement. Bi-monthly check-in meetings with policy staff in the administration unit also ensure adequate progress is being made on Board policy priorities.
- The Board conducts an annual evaluation of the EO's performance, which reflects on the program's overall performance.
- The Board periodically undergoes comprehensive review of operations by external entities, such as DCA, the Bureau of State Audits, and the State Legislature (Sunset Review).

RISK ASSESSMENT PROCESS

The following personnel were involved in the Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board risk assessment process: executive management.

The following methods were used to identify risks: brainstorming meetings, ongoing monitoring activities, and other/prior risk assessments.

The following criteria were used to rank risks: potential impact to mission/goals/objectives, and potential impact of remediation efforts.

RISKS AND CONTROLS

Risk: Lack of Formal Training Programs for Subject Matter Experts

The Board utilizes licensee subject matter experts (SME) for licensing, examination, and enforcement support but lacks a formal training program developed for these SMEs, which could improve the quality and efficacy of the Board's program areas.

Control: Develop and Implement Formal Training Programs for Board Subject Matter Experts

The Board will research, develop, and implement formal SME training programs.

Risk: Lack of Unified and Updated Disciplinary Guidelines

The Board investigates any violations against its Practice Act and the laws subject to its jurisdiction that are reported to the Board. If a violation requires formal disciplinary action, the Board forwards the matter to the Attorney General's office to prosecute.

Prosecutions are conducted in accordance with the Administrative Procedure Act (Government Code sections 11370 through 11529). In reaching a decision on a formal disciplinary action, the disciplinary guideline is used to determine the appropriate level of discipline and draft the settlement or proposed decision.

The Board currently has two disciplinary guidelines because the Board was created as a result of the merger of the Hearing Aid Dispensers Bureau and the Speech-Language

Pathology and Audiology Board in 2010. The prior board and bureau had their own disciplinary guidelines: one for the practice of hearing aid dispensing, which was last updated in 1997; and another for the practices of speech-language pathology and audiology, which was updated in 2004.

Use of these separate outdated disciplinary guidelines can result in weaker consumer protections overall, inconsistent terms and conditions of probation being applied for comparable violations of the Board's laws, and lack of clarity for the Department of Justice and Office of Administrative Hearings regarding the Board's guidance on factors that should influence the level of discipline imposed.

Control: Review and Update the Board's Disciplinary Guidelines

Review and update the Board's disciplinary guidelines to ensure more consistent disciplinary actions for similar violations.

Risk: Lack of Educational Materials to Guide Applicants

While the Board completed its Business Modernization Project to create online licensing applications in 2023, it was not able to create educational materials to guide applicants through the application selection and submission process. Since 2023, it has become clear that applicants need additional guidance on what application type they should be submitting based on their specific pathway to licensure. For example, applicants who recently graduated from a master's degree program who are applying for a Speech-Language Pathology license needs to select one of two applications depending on whether they obtained their degree in the United States or abroad. Without educational materials, the Board often finds that applicants will try to start multiple different types of applications before being directed to the appropriate application type via email or phone. This in turn results in more applications being unnecessarily created and requiring staff review, as well as impacting the Board's system costs, which are based on usage.

Control: Create Educational Materials

Create educational materials to clearly explain the application and licensing process, as well as informational flow charts and diagrams to help guide applicants to select the appropriate application type.

Risk: Outdated Board Website Platform

The Board's website platform is multiple versions behind the current State standard and will soon lose technical support. The Board will need to transition its content to the newest State website platform. This will require the Board to review and update the current content and forms on its website to minimize unnecessary transfer of outdated content or forms. The Board has also directed staff through its Strategic Plan to improve all communications to ensure transparency, enhance clarity and understanding, and increase accessibility and user friendliness.

Control: Review and Update Website Content and Forms

Board staff will work to systematically review and update the content and forms on the Board's website for clarity, understanding, accessibility, and user friendliness. Board staff will then submit revisions to the DCA's Office of Information Services throughout the process to ensure all content is updated and are ready for transition to the new State website platform.

Control: Participate in Website Platform Transition

Collaborate with the DCA Office of Information Services during the website platform transition.

CONCLUSION

The Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

Cherise Burns, Executive Officer

CC: California Legislature [Senate, Assembly]
California State Auditor
California State Library
California State Controller
Director of California Department of Finance
Secretary of California Government Operations Agency