

**Montana Board of  
Speech Language Pathologists & Audiologists**  
**COVID-19 FAQ**  
*(FAQ updated 8/25/20)*

This FAQ is specific to frequently asked questions from licensees and the public in the context of the COVID-19 situation. This FAQ will be updated on an as-needed basis. Check back periodically for updates. If you have a question regarding COVID-19 and Board of Speech-Language Pathologist and Audiologist licensing that is not on this FAQ you can e-mail department staff directly at [dlibsdsip@mt.gov](mailto:dlibsdsip@mt.gov).

If you have general questions pertaining to licensure and the board that are not specifically related to the COVID-19 situation we recommend you review the board website at [www.slpaud.mt.gov](http://www.slpaud.mt.gov). For questions that are not specifically related to the COVID-19 situation you can continue to e-mail customer service staff at [dlibsldhelp@mt.gov](mailto:dlibsldhelp@mt.gov).

**General Message Concerning the Governor's Directives**

If you have questions on what you need to do to comply with the Governor's [July 15 Directive](#) or any previous directives in effect you need to visit the [Governor's COVID-19 Task Force Joint Information Center website](#). You can also contact your local health department.

**Question 1:**

Are aides/assistants allowed to engage in telepractice in Montana during this state of emergency?

**Response 1:**

Unlicensed aides/assistants are still **not allowed to engage in telepractice** since statute prohibits it ([37-15-314](#)(3), MCA). Neither the board nor the department has the authority to change statute. However, as stated in that statute, that prohibition does not prohibit an aide/assistant from serving as a facilitator when a licensee is engaging in telepractice.

Staff have received questions about changes/loosening up of federal laws including federal Medicaid billing restrictions in order to allow greater access to telepractice during the COVID-19 pandemic. Billing as a whole is outside the jurisdiction of the Montana Board of Speech-Language Pathologists and Audiologists and who can bill (or not bill) **does not alter Montana's scopes of practice for speech-language pathologists and audiologists and any**

**unlicensed aides/assistants working under their supervision.** Montana-licensed speech-language pathologists and audiologists must remember that in Montana, aides/assistants are still unlicensed individuals under supervision of a licensee (see [ARM Title 24, chapter 222, subchapter 7](#)) and are prohibited from conducting telepractice under [37-15-314\(3\)](#), MCA. The Montana Governor also signed an order loosening restrictions on telepractice/telehealth. However, that order did not include [37-15-314\(3\)](#), MCA.

Also, see further responses below regarding telepractice by persons who are allowed to engage in telepractice with clients who are located in the state of Montana.

#### **Question 2:**

I am licensed as a [speech-language pathology assistant/audiology assistant] in a jurisdiction(s) that licenses assistants. Can I engage in practice under my assistant license in Montana?

#### **Response 2:**

Assistants are not licensed in Montana. In order to practice under the scope of practice of a speech-language pathologist (see [ARM 24.222.520](#)) you must be licensed as a speech-language pathologist in Montana or fall under the exemptions listed in [37-15-103, MCA](#). In order to practice under the scope of practice of an audiologist (see [ARM 24.222.525](#)) you must be licensed as an audiologist in Montana or fall under the exemptions listed in [37-15-103, MCA](#).

Since aides/assistants are not licensed in Montana you would need to be supervised by a Montana licensed speech-language pathologist or audiologist in Montana in order to work as an aide/assistant (see [ARM Title 24, chapter 222, subchapter 7](#)). Also, see Response #7 regarding telepractice.

#### **Question 3:**

I am currently licensed as a [speech-language pathologist/limited speech-language pathologist/audiologist] under the Montana Board Speech-Language Pathologists and Audiologists. Am I allowed to conduct telepractice in order to provide services to clients located in Montana?

#### **Response 3:**

Yes. Telepractice is a method of delivery of services and not a specific type of license or practice. All laws pertaining to telepractice can be found in:

- [37-15-314, MCA](#)
- [37-15-315, MCA](#); and
- [ARM Title 24, chapter 222, subchapter 9](#). Definitions used in that subchapter can be found in [ARM 24.222.301](#).

#### **Question 4:**

I am currently licensed as a [speech-language pathologist/limited speech-language pathologist/audiologist] under the Montana Board Speech-Language Pathologists and

Audiologists and am going to be conducting telepractice for the first time. Does the board have any training requirements or recommend any particular types of training so I have more information on how to practice telehealth while complying with all of the laws under this board? Also, I heard that the board requires four hours of board-approved training prior to engaging in telepractice?

**Response 4:**

Staff and the board cannot give legal advice so we cannot recommend nor endorse any particular trainings or protocols/best practices. The board does not require that licensees get board approved-training prior to engaging in telepractice. We recently learned that ASHA has outdated information on its website indicating that this board requires four hours of training to engage in telepractice. The board stopped requiring the four hours of training in 2017.

You might try contacting your state and/or national professional association(s) to see if they have any recommendations regarding training courses (e.g. [ASHA](#), [MSHA](#), [AAA](#), [ADA](#), etc.). As a licensee you are still held not only to the regulations cited in Response #1, but also all the other statutes and rules including unprofessional conduct, privacy, etc. regardless of the method you are using to deliver those services.

**Question 5:**

I am currently licensed as a [speech-language pathologist/limited speech-language pathologist/audiologist] under the Montana Board Speech-Language Pathologists and Audiologists. I [am providing/will be providing] telehealth/telepractice services to clients located in Montana. Can I bill insurance for those services?

**Response 5:**

Laws pertaining to billing, including private insurance and Medicare and Medicaid, are outside this board's jurisdiction and regulatory authority. As a licensee you are expected to comply with other state and federal laws that pertain to your scope of practice. However, it is not this board that regulates those specific areas. You could try contacting the [Office of the Commissioner of Securities and Insurance](#) and the [Montana Department of Public Health and Human Services](#) for more information. You could also try contacting your state and/or national professional association(s) to see if they have any recommendations regarding resources.

**Question 6:**

I am a [speech-language pathologist/limited speech-language pathologist/audiologist] under the Montana Board Speech-Language Pathologists and Audiologists. I [am providing/will be providing] telepractice services to clients located in Montana. Since the state of Montana and the federal government have declared state and national emergencies does that alter the types of services I can bill insurance for?

**Response 6:**

See Response #5. This is a fluid situation so if there are any changes due to emergency actions by the Governor this FAQ will be updated accordingly.

**Question 7:**

Can I conduct telepractice in Montana if I am licensed in another state/jurisdiction as a [speech-language pathologist/limited speech-language pathologist/audiologist] but do not have a license in Montana?

**Response 7:**

Telepractice is a method of delivery of services and not a specific type of license or practice. In order to practice one of the professions licensed under this board you must be licensed in the state of Montana (e.g. where the services are occurring) or be exempt from licensure in Montana. See [37-15-103, MCA](#), to view the statutory exemptions from licensure for different license types. Also, see Response #6 regarding emergency interstate licensure registration in Montana.

Note that laws concerning telepractice vary from jurisdiction to jurisdiction so you should also check with the regulatory entity in the jurisdiction where you are licensed with regard to its laws.

**Question 8:**

I read your response to Question #7. Is there some type of emergency exemption for licensure or way to obtain a temporary or emergency license as a [speech-language pathologist/limited speech-language pathologist/audiologist] to provide services to clients who are located in Montana while under the state of emergency declared federally and in Montana?

**Response 8:**

The Department of Labor and Industry Business Standards Division (BSD) has implemented an interstate licensure recognition registration process to allow expedited registration of professionals who hold an active, unrestricted license in another state to begin working in Montana. There is no cost to that registration.

For more information and access to the registration form visit <http://bsd.dli.mt.gov/> or the board's homepage at [www.slpaud.mt.gov](http://www.slpaud.mt.gov). This registration will only enable people to work in Montana when they have registered appropriately with the department and have been **granted** a registration. This registration will only be valid during the period of time the Governor has declared a state of emergency related to COVID-19. While a future date may show in [Licensee Lookup](#), it should be understood to only be valid when a state of emergency is in effect if next to name it says "Covid-19 Reg".

Otherwise, in order to practice in Montana you must be licensed in Montana or fall under one of the exemptions listed in [37-15-103, MCA](#).

**Question 9:**

I am a student enrolled in a graduate degree program. I normally physically attend college in another state or jurisdiction but am now attending class remotely from Montana. As part of my

degree program I am being supervised for a clinical practicum. My supervisor is located in the state/jurisdiction where I usually practice. Can I continue with my clinical practicum while I am physically located in Montana?

**Response 9:**

You will need to consult with your supervisor and that state/jurisdiction in which you will actually be practicing. Since any clients you would be seeing would be located in that other state/jurisdiction the regulations that apply would be those of your college and/or that state/jurisdiction's licensing entity.

**Question 10:**

I am supervising a student enrolled in a graduate degree program at a college located outside of Montana. I am supervising that student for an clinical practicum associated with that degree program. The student I supervise normally physically attends college in the state/jurisdiction in which I am located. However, that student is now attending classes remotely from Montana. Can I continue supervising that student internship without obtaining a Montana license?

**Response 10:**

Generally speaking students practicing in the state of Montana as part of their degree programs are exempt from licensure as described in [37-15-103](#)(4), MCA. However, since the student would presumably be offering services to clients located in the state/jurisdiction in which you, the supervisor, were located, it would be that state/jurisdiction's laws that applied, not Montana's. Under Montana's laws, you as the supervisor would not need to be licensed in Montana since you would not be practicing in Montana.

**Question 11:**

I am currently licensed as a [speech-language pathologist/audiologist]. Many conferences and training courses are being cancelled or changed to online due to health and safety concerns, etc. What should I do if I cannot meet my annual continuing education (CE) requirements?

**Response 11:**

The issue of conferences and training courses being cancelled is affecting licensees nationwide in many professions. For the time being, keep in mind that this board allows its licensees to obtain online CE. Based on guidance developed by this department for the licensing boards under it (including this one), licensing boards with CE requirements can consider options for extending the period of time licensees have to complete CE and/or the process for granting hardship waivers. Based on circumstances at present, this board may consider those options at a future board meeting.

There is no need to apply for a hardship exemption at this time unless you had already intended to do so for non-COVID-19 reasons. Licensees do not need to renew their licenses again until February 1, **2021**.

**Question 12:**

I have completed all requirements for full licensure as a [speech-language pathologist/limited speech-language pathologist/audiologist] except for passing an approved national exam. I have contacted the exam entity and they are not administering exams and/or testing centers are currently closed due to the COVID-19 pandemic. Can I be issued a full license without having passed the exam?

**Response 12:**

The issues of cancelled licensing exams and/or closed testing centers are issues that face many licensees and applicants. These issues impact many boards and many licensed professions across the U.S. and other jurisdictions. Just in Montana there are approximately 200 professional and occupational license types under the Department of Labor and Industry, a majority of which require passage of a national exam. Testing centers are beginning to open up with limited appointments across the country for persons wishing to register for the PRAXIS exams. Visit the [PRAXIS website](#) for the most current information.

**Question 13:**

I want to apply for a Montana license as a [speech-language pathologist/limited speech-language pathologist/audiologist]. Is Montana still issuing "regular" licenses during the COVID-19 situation? Has the normal application process changed? Can I expect delays?

**Response 13:**

The department and board recognize that the current COVID-19 pandemic has created discord in the normal application, examination, and licensure process. We are striving to address these concerns and potential roadblocks as quickly as possible; however, please understand that this will not occur overnight. The board must continue its public safety mission while adapting to daily changes occurring from the pandemic. This will take time. Applicants are encouraged to begin their application for licensure and to complete as much of the required information as possible. Applications remain valid for one year under normal circumstances. If you submit your application and an item is missing, our licensing specialist will work with you to complete the application. We do not deny applicants for submitting an incomplete application. By completing the application's remaining parts, exempting exams, etc., you can get ahead on the licensure process.

[Online applications](#) are always the most efficient application method and allow you to upload your own supplemental forms directly into your application at any time. Paying the fee triggers the beginning of the staff review process. Be aware that to verify authenticity, some documents such as exam results, transcripts, and background checks must be sent to the department directly from the source and cannot be uploaded by the applicant.