

September 26, 2025

G-2025-Early Start-001

TO: REGIONAL CENTER EXECUTIVE DIRECTORS

SUBJECT: PROVIDERS OF SPEECH AND LANGUAGE SERVICES IN
EARLY START

This letter provides guidance to regional centers regarding qualified providers of speech and language services in the Early Start program specifically Speech-Language Pathologists (SLP) in Clinical Fellowship (SLP-CF) who hold a Required Professional Experience (RPE) license and Speech-Language Pathology Assistants (SLPA). This letter also clarifies applicable reimbursement rates for these service providers as originally discussed in the Department's [November 19, 2024 directive](#).

Regulatory Requirements

Current [regulations](#) require vendored providers of speech and language services, typically vendored under Early Start Specialized Therapeutic Services (service code 116), Infant Development Program (service code 805), or Speech Pathology (service code 707) to possess the license, certification and/or credential required by the State of California to practice in the field of service being offered.

A vendored 116, 805 or 707 provider may employ SLPs who are RPE license holders and SLPAs. These professionals must meet specified Title 17 regulations to provide speech and language services to an infant or toddler subject to supervision requirements specified in their license. Regional centers shall allow these service providers to provide services in the Early Start Program.

Speech-Language Pathologists in Clinical Fellowship with Required Professional Experience

SLPs in a Clinical Fellowship (CF)* are professionals holding a master's degree and a [Required Professional Experience temporary license](#) issued by the California Speech-Language Pathology & Audiology & Hearing Aid Dispensers Board. When employed by a vendored regional center provider, SLP-CFs who hold a RPE temporary license may provide the full range of speech and language pathology services which includes conducting evaluations, treatment planning, and therapy for various communication disorders.

*The CF corresponds to the optional Clinical Fellowship certification awarded by the national certifying body, American Speech-Language-Hearing Association (ASHA).

Regional Centers shall allow the use of SLP RPE license-holders, who may be referred to as clinical fellows or CFs, as providers of Early Start speech and language services, ensuring compliance with California's licensure standards and acknowledging their comprehensive training as qualified speech-language pathologists.

Speech-Language Pathology Assistants

SLPAs are state-licensed assistants who possess at least a two-year degree in speech and communication disorders. They can provide services directly to infants or toddlers following SLP-developed goals and treatment plans. SLPAs can provide the service independently with indirect supervision (i.e., not at the same facility as, or in close proximity from the supervising SLP) in accordance with California's licensing regulations. An SLPA license [does not permit](#) the holder to conduct client evaluations.

In 2019, [Cal. Code Regs. Tit. 17, Sections 54319 & 54342](#) were amended to allow SLPAs to provide Early Start services. [Recent regulatory changes](#) further allow SLPAs to receive supervision through electronic means and added corresponding new requirements to the supervising SLPs.

Rates

SLP-CFs who hold an RPE license will align to the Specialized Therapeutic Services Professional rate under service code 116, or to the Speech/Language Pathologist subcode under service code 805. Please reference [D-2024-Rate Reform-003 Attachment C](#), for the subcode and rate category assignments for this service.

Regional center staff are encouraged to review their current policies and practices to ensure compliance with these guidelines. Continued recognition of SLP-CFs with RPE licenses and SLPAs as qualified speech and language service providers in Early Start is expected to help promote infant/toddlers' access to timely and high-quality services.

For Early Start program questions, regional centers may contact earlystart@dds.ca.gov. For questions on rates or vendorization, please contact ratesquestions@dds.ca.gov.

Sincerely,

Original Signed by:

MARICRIS ACON

Deputy Director

Children, Adolescents, and Young Adult Services Division

cc: Regional Center Administrators
Regional Center Directors of Consumer Services
Regional Center Community Services Directors
Association of Regional Center Agencies