

## Memorandum

To: Members of the Senate Government Operations Committee  
From: Lisa Durstin, Vermont Speech-Language Hearing Association (VSHA)  
Date: February 23, 2016  
Re: S.217

Madam Chair White and members of the Committee:

I received this today from a member of our association and was given permission to pass on to you.

Thank you for your consideration.

TO: Lisa Durstin  
FROM: Kathy Keizer  
RE: Licensing 2/23/16

The Office of Professional Regulation (OPR) is the state licensing body for speech/language pathologists. SLPs were required to obtain the OPR license this past summer (2015). Since the governing body for SLPs has been named as OPR for Vermont, AOE should no longer be asking for licenses (and licensing fees) for SLPs who already pay for their ASHA licenses. Along with all of this, AOE has increased the number of hours that SLPs are required to accrue to qualify for AOE licensing.

With the Certificate of Clinical Competence (3Cs), SLPs are entitled to practice in a variety of settings, including schools/pre-schools. Working in the school system is a particular “specialty” and should not require an additional license. Working in a rehabilitation facility, hospital or industrial setting does not require a license for those particular settings. The ASHA license and the OPR license suffice. Two state agencies should not be regulating one professional.

Beyond that, the requirements now mandated for the end-of-cycle of June, 2016 are complex and will involve much time, effort and probably differing opinions depending on who one speaks with. I have already spent 3+ hours on this and gotten nothing accomplished of any real import or consequence. My last cycle of licensure for AOE (2010-2013) required me to provide a list of the professional development hours and dates. That was it. A far sight more appropriate than the many steps the current process demands.

The majority of SLPs used to work primarily in schools; this is no longer the case. This licensing fiasco is one good reason for that. SLPs in Vermont are in short supply; adding the burden of a third license requirement will not promote recruitment of new SLPs to replace those of us who are at the end of our professional careers.

Kathy Keizer, CCC-SLP