



MANPOWER AND  
RESERVE AFFAIRS

## OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

1500 DEFENSE PENTAGON  
WASHINGTON, D.C. 20301-1500

April 22, 2022

Vermont Legislature  
House Committee on Government Operations  
115 State Street, Room 11  
Montpelier, VT 05602

Representative Sarah Copeland Hanzas  
Chair

Remarks of  
Christopher R. Arnold  
Northeast Region Liaison  
United States Department of Defense-State Liaison Office

**Support of: H.577 - An act relating to Vermont's adoption of the Audiology and Speech-Language Pathology Interstate Compact**

### Testimony

The Department of Defense is grateful for the opportunity to support policy changes proposed in Vermont House Bill 577, the Audiology and Speech-Language Pathology Interstate Compact (ASLP-IC), which addresses licensing issues affecting our service members and their families. The purpose of the ASLP-IC is to facilitate interstate practice of audiology and speech-language pathology with the goal of improving public access to services, while preserving the regulatory authority of states to protect public health and safety through the current system of state licensure.

My name is Christopher Arnold. I am the Northeast Regional Liaison for the Defense-State Liaison Office, operating under the direction of Under Secretary of Defense for Personnel and Readiness. We represent the Department and work with state leaders across the country who are concerned for troops and their families' welfare by harmonizing state and federal law and regulation on policy problems of national significance.

Licensure issues for both our transitioning military members and their spouses have been a priority for the Department for several years. The issue is so important, the Secretary of Defense has made taking care of Service members and their families a fourth line of effort in the National Defense Strategy.<sup>1</sup>

ASLP-IC seeks to eliminate barriers to interstate professional audiology and speech-language pathology practice, improve patient access to professional services, and enhance public protection

---

<sup>1</sup> United States Department of Defense, "DOD Amplifies Focus on People in Executing National Defense Strategy." August 5, 2020. <https://www.defense.gov/News/News-Stories/Article/Article/2300553/dod-amplifies-focus-on-people-in-executing-national-defense-strategy/>

through a shared interstate licensure data system. Of additional benefit is the compact's utilization of a mutual recognition model of interstate practice, which enhances opportunities of portable careers for military spouses by providing consistent rules which allow licensed members to work in other states through "privilege to practice policies", or more easily transfer their license to a new state.

The Secretaries of the Military Departments have made the importance of military spouse licensure explicitly clear as they consider the availability of license reciprocity when evaluating future basing or mission alternatives. In 2018, the secretaries of the Army, Navy and Air force issued a policy memorandum to the National Governor's Association noting they will consider the quality of schools near bases and whether reciprocity of professional licenses is available for military families when evaluating future basing or mission alternatives.<sup>2</sup> This consideration was codified by Congress as a requirement in the 2020 National Defense Authorization Act.<sup>3</sup>

To address license portability for military spouses, states have turned to occupational licensure interstate compacts, which streamline relicensing between member States of a compact for all practitioners in an occupation, and provide specific support for military spouses of relocating active-duty personnel through provisions recognizing unique requirements of military life.

A 2018 study by the Federal Trade Commission, "Options to Enhance Occupational License Portability," recognized there are two approaches to alleviating barriers to license portability. Namely, mutual recognition, which relates to occupational compacts, and expedited licensure, which encompasses exemption-based approaches.<sup>4</sup>

Occupational licensure compacts provide consistent rules for licensed members to work in other states, such as Vermont residents presently domiciled in other states while accompanying their military spouse on active-duty. Common misinformation about compacts is that they either lower or raise the standards for the occupation, when in fact, compact states have the option to issue a "compact license" and also a "State-only license" to maintain their State's standards.

Professional licensure has been an enduring problem for military spouses. Obtaining a license in a new State can be both time consuming and expensive, and military spouses often cannot adequately anticipate how to prepare for licensure in a new State due to the unpredictable nature

---

<sup>2</sup> United States Department of Defense, "Service secretaries say quality of schools, reciprocity of licenses should be considered in future basing decisions." February 23, 2018. <https://www.defense.gov/News/Releases/Release/Article/1449706/service-secretaries-say-quality-of-schools-reciprocity-of-licenses-should-be-co/>

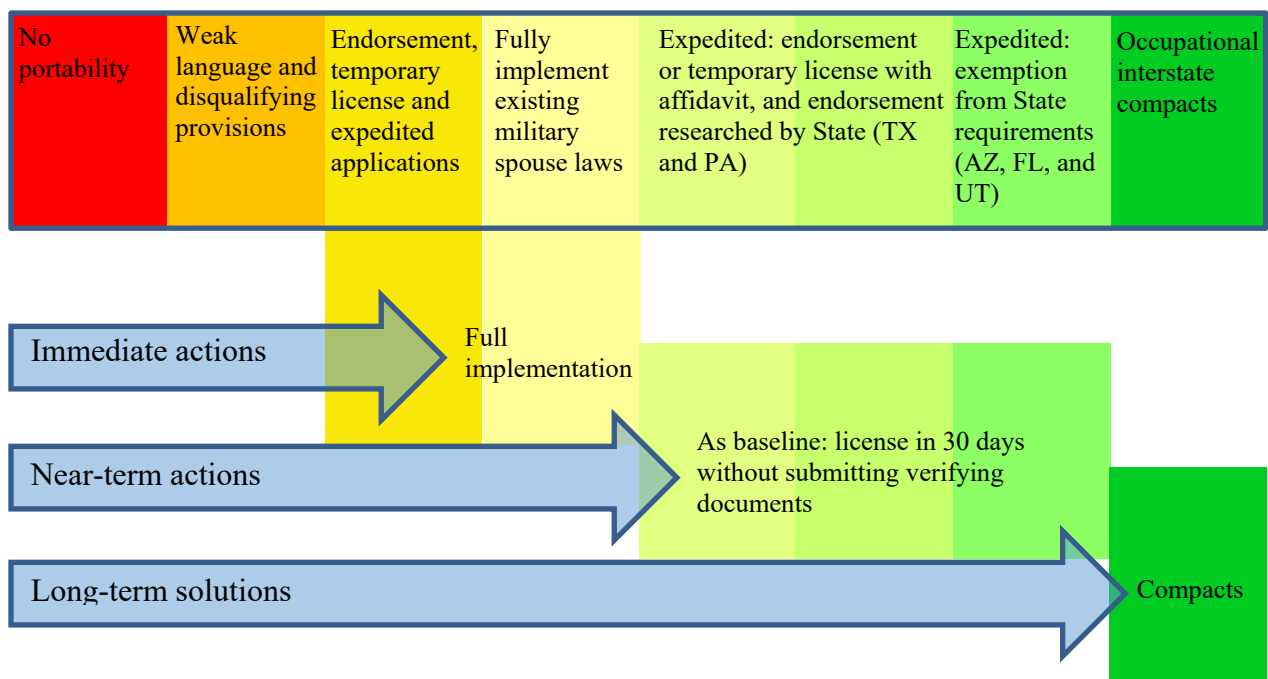
<sup>3</sup> Notably, §2883(h) requires the Department and each of the military services to produce annual basing decision scorecards at the state and installation level considering military family readiness issues, including interstate portability of licensure credentials.

The secretaries must consider "*whether the State in which an installation subject to a basing decision is or will be located ... has entered into reciprocity agreements to recognize and accept professional and occupational licensure and certification credentials granted by or in other States or allows for the transfer of such licenses and certifications granted by or in other States.*" ( *Id.* (b) )

<sup>4</sup> Karen A. Goldman. "Options to Enhance Occupational License Portability." Federal Trade Commission. September 2018. Retrieved from <http://www.ftc.gov/policy/reports/policy-reports/commission-and-staff-reports>

of military moves. The short duration of military assignments, coupled with lengthy relicensing processes, can discourage military spouses from seeking relicensure, causing them to quit an occupation or causing military families to leave the military.

Complicating matters further, the term “reciprocity” is used differently among the States. The continuum of reciprocity related programs is represented graphically below. The continuum goes from red, representing little to no portability, to dark green, representing the DoD’s optimum state of full reciprocity. Understanding that military spouses need assistance now, and that many States have already committed to a variety of approaches, the Department advocates that States should pursue multiple approaches to reciprocity simultaneously. Available alternatives can be categorized as being more immediately attainable, achievable within the near-term, or obtainable in the long-term:



Military spouses are a cross-section of the American population, although a greater percentage of them are in licensed occupations than their civilian counterparts,<sup>5</sup> and they are significantly more mobile.<sup>6</sup> States have committed to using interstate compacts, which establish common understanding of competency and its measurement within the occupation, to resolve the interstate issue of license portability.

<sup>5</sup> 34 percent of active duty spouses self-identified as needing a State issued license to work (2017 Survey of Active Duty (Active Component) Spouses, Tabulations of Responses; Office of People Analytics Report No. 2018-006, May 2018), compared to 30 percent of the civilian population (The Hamilton Project, Brookings Institute, [https://www.hamiltonproject.org/charts/percent\\_of\\_occupations\\_requiring\\_a\\_license\\_by\\_state](https://www.hamiltonproject.org/charts/percent_of_occupations_requiring_a_license_by_state))

<sup>6</sup> “Military spouses are 10 times more likely to move across State lines than their civilian counterparts,” “Supporting Our Military Families: Best Practices for Streamlining Occupational Licensing Across State Lines,” U.S. Department of Treasury and U.S. Department of Defense, February 2012, page 7.

Compacts can provide seamless reciprocity for military spouses in an occupation. Barriers to the transfer and acceptance of certifications and licenses that occur when state rules differ can have a dramatic and negative effect on the financial well-being of military families.

Frequent moves and cumbersome licensing and certification requirements limit career options for military spouses. Removing these barriers, creating reciprocity in licensing requirements, and facilitating placement opportunities can help a military family's financial stability, speed the assimilation of the family into its new location, and create a desirable new employee pool for a state.

The coronavirus pandemic demonstrates that interstate licensure compacts such as ASLP-IC can provide a permanent solution to leverage underutilized medical talent to meet labor shortages in high-need areas. The ASLP-IC will assist Vermont audiologists and speech-language pathologists practicing both in and out-of-state, while improving the quality of care in the Green Mountain State.

In closing, we are grateful for the tremendous efforts that Vermont has historically made to support our uniformed service members and their families. We appreciate the opportunity to support the passage of the policies reflected in House Bill 577 and the enactment of the Audiology and Speech-Language Pathology Interstate Compact and are especially grateful to the Representative Webb for introducing this important piece of legislation.

As always, as liaison to the northeast region, I stand ready to answer whatever questions you may have.

Yours etc.,

**CHRISTOPHER R. ARNOLD**  
Northeast Region Liaison  
Defense-State Liaison Office