## **Covert-ByBee, Claire**

From: Dick, Rhonda < Rhonda.Dick@boystown.org>

**Sent:** Thursday, June 11, 2020 10:32 AM

**To:** Covert-ByBee, Claire

**Subject:** RE: Occupational Board Reform Act Survey Request

15: Our board oversees regulations related to licensure and practice of Audiologists, Speech-Language Pathologists and assistants in each of these professional fields. Revisions to the current regulations of our Board within the past 2 years have reduced restrictive language in the regulations and have eliminated the need for dual licensure for professional provision of services covered by our primary professional licensure. Current regulations also allow for provision of services via telehealth which will become increasingly important in the coming years, and have been updated to allow for needed changes in the way that professionals acquire continuing education. In instances where the Board has investigated issues related to licensure violations, we have been able to refer to our Licensure Regulations and have found them to be a concise and definitive source of guidance in our decision-making. We feel that that the current regulations for our Board are effective.

16: Lack of licensure and oversight of the professions covered by this board would be detrimental in the following ways:

- there would be no process for investigation of violations related to practice/scope of practice, ethics, etc which is essential in providing protections to all professionals within the practice and to patients/clients/students receiving services. Regulations for disciplinary actions when violations do occur would also not exist, and are vital in ensuring patient/client/student safety and for providing a framework for completion of restitution, monitoring, training, and return to professional practice when appropriate.
- Inconsistencies in education and training requirements for licensure within the professions could exist and when
  they do would undermine the goal of ensuring that minimum skill levels and competencies have been met prior
  to licensure as an Audiologist or Speech-Language Pathologist. This could also create ambiguity in scopes of
  practice for our professions which would allow for practice by individuals lacking the background and education
  to do so.
- There would be no regulation of requirements for continuing education as currently outlined within the
  licensure regulations. Wide variability in the quality and quantity of continuing education could exist if standards
  were not in place. Professionals within our fields rely on these regulations and those put forth by our national
  organizations (ASHA/AAA) to ensure that they are in compliance with minimum standards for continued
  professional practice.
- Lack of regulatory standards related to professional education/training and practice would make it very difficult
  to obtain licensure via reciprocity in another state. It would be difficult to compare a professional's credentials
  (education, training, CEU requirements) from one state when applying for licensure in another state if no
  regulatory standards for licensure existed.

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Thanks!

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