



To: House Health and Human Services Committee

From: Rachelle Colombo
Executive Director

Date: March 11, 2021

Subject: SB 77; enacting the audiology and speech language compact

The Kansas Medical Society appreciates the opportunity to submit the following comments regarding SB 77, enacting the audiology and speech language compact. Occupational licensure compacts have become more and more common in recent years as telehealth and a more mobile society have given rise to professional practices that extend more broadly and require multi-state licensure.

To date, Kansas has enacted an interstate medical licensure compact, a nursing compact, and a physical therapy compact. Each of these compacts allow for practitioners to secure licenses in multiple states by meeting broad criteria for the profession and by practicing according to the limitations and standards set forth in participating states. A provider that is licensed through a compact is subject to licensure requirements and limitations established by each state where they provide care.

SB 77 is structured in the same fashion. Section 2, H, clearly stipulates that a licensee from a member state may practice as an audiologist or speech-language pathologist in the remote state under its laws and rules. The practice of audiology or speech-language pathology occurs in the member state where the patient or client or student is located at the time of the patient or client or student encounter. It further underscores this in subsection X, stating that state practice laws govern the scope of practice and discipline for the practice of audiology. These provisions are key in ensuring state sovereignty over licensure and regulation of audiologists. The Kansas Medical Society supports establishing compacts that expedite licensure, so long as states retain sole authority over necessary licensure criteria, regulation and discipline. Compacts are a helpful tool for multi-state licensure, but should never abrogate state authority.

Currently, audiologists are licensed and regulated by the Kansas Department of Aging and Disability Services and statute stipulates that a physician serves on the board of speech-language pathology and audiology. We support mirroring this provision in the governance of the compact to ensure consistency with state law. We respectfully request amending SB 77 to include this provision and appreciate the opportunity to provide these comments for your consideration. Thank you.