



**Economic Impact Analysis
Virginia Department of Planning and Budget**

18 VAC 30-20 – Regulations Governing the Practice of Audiology & Speech-Language Pathology

Department of Health Professions

January 22, 2007

Summary of the Proposed Regulation

Pursuant to Chapter 97 of the 2006 Acts of the Assembly, the Board of Audiology & Speech-Language Pathology (board) proposes to amend its regulations to create provisional licensure for doctoral students who have obtained at least the equivalent of a master's education and who have passed a required examination.

Result of Analysis

The benefits likely exceed the costs for this proposed regulatory change.

Estimated Economic Impact

Prior to implementation of emergency regulations in September 2006, individuals who had passed the national audiology accrediting examination and had been awarded 1) a master's degree from a master's program in audiology, 2) the equivalent of a master's education in a doctoral program or 3) a doctoral degree from a doctoral program in audiology were eligible for licensure. This, theoretically, allowed all audiology students to gain licensure after they had completed at least a master's or its equivalent.

The national accrediting group for audiologists, the American Speech-language Hearing Association (ASHA), has, however, mandated that only doctoral programs in audiology will be accredited as of 2012. Additionally, doctoral programs have been reluctant to certify that their students have gained a "master's level" education (for the purpose of gaining full licensure). Students in these programs have been left at a disadvantage as they have been left ineligible for licensure until they completed their doctorates.

To address this inequity, the General Assembly has directed the board to implement a provisional licensure program for doctoral students in audiology who have finished master's level coursework. These proposed regulations, and the emergency regulations that they replace, will allow doctoral students to apply for provisional licensure once they have finished the equivalent of a master's education and have passed the required exam (the fee for this license is \$50). Provisionally licensed individuals will have their work supervised by a licensed audiologist and may work in a clinical setting. This provisional license will allow them to complete the one year practical fellowship that is required for full ASHA accreditation sooner than if they had to wait until they graduated.

There will be a short term difference in licensure between fully licensed audiologists who have just completed their master's degrees but have not completed their clinical fellowships and provisionally licensed audiologists who have completed coursework equivalent to a master's degree in a doctoral program but have not completed their clinical fellowships (at least until 2012 when master's programs will no longer be accredited). Taken at face value, this licensure difference allows the individuals with master's degrees an advantage as they have no supervision restrictions that they must practice under. In practice, the Department of Health Professions (DHP) reports, facilities that hire audiologists would not allow fully licensed but not yet accredited individuals any greater freedom of practice than will be afforded to provisionally licensed individuals.

Businesses and Entities Affected

This proposed regulatory change will affect students who are enrolled in audiology and speech pathology doctoral programs. DHP reports that the board has issued 2 provisional licenses to such students since emergency regulations were promulgated in September 2006.

Localities Particularly Affected

No locality in the Commonwealth will be particularly affected by this proposed regulation

Projected Impact on Employment

This proposed regulatory change will allow affected doctoral students to attain a provisional license, and complete their year-long clinical fellowship, before they graduate. This

will allow them to be fully accredited at the time they finish their degree and will increase their chance of being fully employed in their chosen field a year sooner.

Effects on the Use and Value of Private Property

This regulatory change will allow affected doctoral students to be fully employable approximately one year sooner than they otherwise would be; because of this, the total lifelong value of their degree and license will likely increase.

Small Businesses: Costs and Other Effects

DHP reports that none of the regulated entities that will be affected by the proposed regulatory change qualify as small businesses.

Small Businesses: Alternative Method that Minimizes Adverse Impact

This proposed regulatory change will not affect any small businesses in the Commonwealth.

Legal Mandate

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.H of the Administrative Process Act and Executive Order Number 21 (02). Section 2.2-4007.H requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. Further, if the proposed regulation has adverse effect on small businesses, Section 2.2-4007.H requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the

regulation. The analysis presented above represents DPB's best estimate of these economic impacts.