



Economic Impact Analysis Virginia Department of Planning and Budget

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

Department of Health Professions

November 13, 2003

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.G of the Administrative Process Act and Executive Order Number 21 (02). Section 2.2-4007.G 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. The analysis presented below represents DPB's best estimate of these economic impacts.

Summary of the Proposed Regulation

The Board of Audiology and Speech-Language Pathology (board) proposes to: 1) change the license renewal cycle from biennial to annual, and 2) increase its licensing fees.

Estimated Economic Impact

As of June 30, 2003, the board's fiscal account had a balance of negative \$91,269. The board anticipates that its expenditures will continue to exceed its revenue without increased fees. In order to eliminate the current and future negative balances, the board proposes to increase its per annum fees.

Currently, the duration for audiology and speech-language pathology licenses is two years. The board proposes to require annual renewal of the licenses, while simultaneously increasing per annum licensure fees. The following table displays current fees and proposed fees on a comparable per annum basis.

Licensure Fees on a Per Annum Basis

<u>Licensure Fee Category</u>	<u>Current Fee</u>	<u>Proposed Fee</u>
Audiology license application	\$50	\$135
Audiology license renewal	\$30	\$75
Audiology late renewal	N/a	\$100
Audiology license reinstatement	\$50	\$135
Inactive audiology license renewal	\$15	\$40
Speech-language pathology license application	\$50	\$135
Speech-language pathology license renewal	\$30	\$75
Speech-language pathology late renewal	N/a	\$100
Speech-language pathology license reinstatement	\$50	\$135
Inactive speech-language pathology license renewal	\$15	\$40
School speech-language pathology license application	\$25	\$70
School speech-language pathology license renewal	\$30	\$40
School speech-language pathology late renewal	N/a	\$55
School speech-language pathology license reinstatement	\$50	\$70
Inactive school speech-language pathology license renewal	\$15	\$20

In the current regulations the fee for the school speech-language pathology license is the same (\$60 over two years) as the fees for the audiology or speech-language pathology licenses. The fees for all three licenses are higher in the proposed regulations; but the proposed fee for the school speech-language pathology license is lower (\$40 for one year) than the other two (\$75 for one year). According to the department, it is less costly to regulate school speech-language pathologists since, unlike audiology and full speech-language pathology license holders, the department does not check the education and training for school speech-language pathology

license applicants. The board simply accepts evidence of qualification via endorsement from the Board of Education.

In addition to the changes to the licensure fees, the board proposes to charge a new \$200 fee for approval of continuing education sponsors. Up until now, the department has been absorbing significant costs relating to the approval process of continuing education sponsors.¹ The department estimates that a \$200 fee per sponsor applicant is necessary to offset those costs. Without this fee, the licensure fees would need to be raised further to offset the board's full expenditures.

Businesses and Entities Affected

The proposed regulations affect the 409 licensed audiologists, 2,222 licensed speech-language pathologists, 79 school speech-language pathologists, their patients, and individuals considering becoming either audiologists or speech-language pathologists, and continuing education course providers. There are approximately 25 applicants for licensure in audiology and 125 applicants for licensure in speech-language pathology each year.²

Localities Particularly Affected

The proposed amendments affect all Virginia localities.

Projected Impact on Employment

The proposed fee increases are unlike to affect the employment of full-time audiologists and speech-language pathologists. The higher fees may discourage some individuals from working part-time.

Effects on the Use and Value of Private Property

The proposed significant increases in licensure fees will commensurately reduce the value of licensees' practices. The proposed \$200 fee for continuing education sponsor approval will reduce the value of new continuing education course providers.

¹ The process for approving a continuing education provider entails submission of an application with documentation on the courses, instructors, and objectives. Staff time is spent on reviews for completeness, securing follow-up information, copying of application packages, and distribution to members of the continuing education committee for their review and approval. Members of the continuing education committee are paid a per diem for the time spent in review. If there is no agreement among members of the committee or if the provider disputes the decision of the committee, a special conference committee must be convened to hear the case. That would necessitate expenditures related to bringing board members to Richmond or hearing the case in venue.

² Source for numbers: Department of Health Professions