



March 11, 2026

The Honorable Matthew Koch
Chair
Committee on Licensing, Occupations & Administrative Regulations
Kentucky General Assembly
702 Capital Ave.
Frankfort, KY 40601

RE: SB 177

Dear Representative Koch:

On behalf of the American Speech-Language-Hearing Association (ASHA), I am writing in opposition to SB 177. While we share the legislature's goal of addressing workforce shortages and streamlining reimbursement, the proposal to eliminate the postgraduate professional experience requirement is a short-sighted solution that will have long-term, detrimental effects on Kentucky's health care infrastructure and the quality of care provided to its citizens.

ASHA is the national professional, scientific, and credentialing association for 247,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 2,500 ASHA members reside in Kentucky.¹

Public Protection and Clinical Readiness

While the Senate floor discussion characterized this bill as an effort to "remove outdated language" and modernize the profession, this description is fundamentally inaccurate. The current language in the Kentucky statute represents best practices for licensing SLPs. Eliminating the mandatory nine-month postgraduate professional experience requirement would undermine the oversight necessary to ensure public protection and patient safety. Forty-nine other states mandate a period of postgraduate professional experience, with North Dakota being the sole exception—not because it repealed the requirement, but because it never established one in the first place.

The jump from a supervised graduate practicum to a clinical role is a major transition. The postgraduate year serves as an essential bridge, providing the mentorship necessary to manage cases, navigate insurance billing, and resolve sensitive ethical dilemmas under the guidance of a seasoned professional.

Removing this requirement would leave Kentucky residents vulnerable. This is not an untested theory; both Virginia and Oregon recently considered similar proposals to eliminate the postgraduate supervised experience. In both cases, they rejected the changes after experts demonstrated that the risks to professional standards and public safety far outweighed any perceived benefits.

Continued Risks to Interstate Mobility

While the Senate floor discussions suggested that the Committee substitute bill creates a pathway for compact participation, a technical review reveals significant legal hurdles. After

consulting with the Compact general counsel, it appears unlikely that the proposed changes will be accepted. Because interstate compacts depend on uniformity, the bill's deviation from national standards poses a direct threat to Kentucky's membership in the Audiology & Speech-Language Pathology Interstate Compact.

The primary conflict lies in clinical requirements: the bill mandates only a three-month postgraduate experience, whereas 36 other member states require nine months. If the bill passes, Kentucky will face a compliance review to ensure alignment with other member states and may be found in noncompliance. Consequently, passing this legislation could result in Kentucky's exclusion, stifling professional mobility and reducing patient access to cross-border care by both SLPs and audiologists

ASHA is committed to working with the Commonwealth to find innovative ways to strengthen the workforce. However, undermining the nationally recognized entry-to-practice standard is not the answer. We urge you to maintain the current requirements to ensure Kentucky's SLPs remain highly qualified, professionally mobile, and prepared to serve the public.

Thank you for your time and dedication to protecting the health and welfare of Kentuckians. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,



Linda I. Rosa-Lugo, EdD, CCC-SLP
2026 ASHA President

¹ American Speech-Language-Hearing Association. (2025). *Kentucky* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-flyers/kentucky-state-flyer.pdf>