



September 15, 2021

Honorable J. Anne Parks  
Chair  
Occupational Regulation and Licensing Boards Subcommittee  
Medical, Military, Public and Municipal Affairs Committee  
South Carolina House of Representatives  
P.O. Box 11867  
Columbia, SC 29211

Re: Support for HB 3840, the Audiology & Speech-Language Pathology Interstate Compact

Dear Representative Parks:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to offer support for HB 3840, the Audiology and Speech-Language Pathology Interstate Compact (ASLP-IC), and to clarify some misrepresentations circulating around this legislation.

The American Speech-Language-Hearing Association is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 2,800 ASHA members reside in South Carolina.<sup>1</sup>

ASHA members often have difficulty obtaining multiple state licenses to practice due to administrative burdens. These burdens hinder their ability to provide quality services and restrict consumer access in underserved and rural communities. ASHA is pleased to support this bill, which will:

- increase access to care for patients, clients, and/or students; and
- facilitate continuity of care when patients, clients, and/or students relocate or travel to another state, specifically with members of the military and their spouses.

ASHA would also like to directly address the falsehoods about the ASLP-IC provided by the American Academy of Otolaryngology-Head and Neck Surgery (AAO-HNS). The spurious claims presented by AAO-HNS appear to be an effort to derail the chance of ASHA members benefiting from the same opportunity that AAO-HNS members have through the Interstate Medical Licensure Compact. ASHA has successfully defended the ASLP-IC in other states. Attached to this letter is a *Myths and Facts* document, which outlines these issues. The newest claim by AAO-NHS regarding ASLP-IC funding is patently false.

South Carolina is a member of five national compacts and three occupational licensure compacts, which all have similar language allowing the member states to levy an assessment to pay for operations. These include: the Interstate Compact for Adult Defender Supervision; the Interstate Compact for the Placement of Children; the Interstate Juvenile Compact; the Emergency Management Assistance Compact; the Military Children's Compact Commission; the Nurse Licensure Compact; the Physical Therapy Compact; and the EMS Compact.

Like all the interstate compacts mentioned above, the ASLP-IC would give member states the ability to collect an annual assessment to cover the cost of operations. Currently, the only licensure compacts that levy an annual assessment are the Nursing Compact and the

Psychology Compact. The Nursing Compact assesses each member state \$6,000 per year while the Psychology Compact assesses states based on usage.

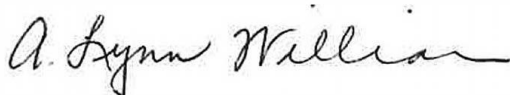
Unfortunately, AAO-HNS is claiming that ASLP-IC member states will have “to continue to pay for their membership even after withdrawal.” However, the ASLP-IC has no such statement and clarifies the following about state withdrawal from the compact in Section 12 (c).<sup>2</sup>

***C. Any member state may withdraw from this Compact by enacting a statute repealing the same.***

- 1. A member state’s withdrawal shall not take effect until six (6) months after enactment of the repealing statute.***
- 2. Withdrawal shall not affect the continuing requirement of the withdrawing state’s audiology or speech-language pathology licensing board to comply with the investigative and adverse action reporting requirements of this act prior to the effective date of withdrawal.***

I hope you will ignore these desperate attempts to discredit the ASLP-IC by supporting passage of HB 3840 and joining the other 15 states that have already passed ASLP-IC legislation. 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](mailto:sadams@asha.org).

Sincerely,



A. Lynn Williams, PhD, CCC-SLP  
2021 ASHA President

Attachment

---

<sup>1</sup> American Speech-Language-Hearing Association. (2020). *South Carolina* [Quick Facts] <https://www.asha.org/siteassets/uploadedfiles/South-Carolina-State-Flyer.pdf>.

<sup>2</sup> Audiology and Speech-Language Pathology Interstate Compact (ASLP-IC). (n.d.). *Final Legislation*. [https://aslpcompact.com/wp-content/uploads/2021/01/Final\\_ASLP-IC\\_Legislation\\_Correct\\_1.6.21.pdf](https://aslpcompact.com/wp-content/uploads/2021/01/Final_ASLP-IC_Legislation_Correct_1.6.21.pdf).