

# Legislative Analysis



## **SPEECH-LANGUAGE PATHOLOGIST EDUCATIONAL LIMITED TEMPORARY LICENSE**

Phone: (517) 373-8080  
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**Senate Bill 811 (S-1) as reported from House committee**  
**Sponsor: Sen. Curtis S. VanderWall**  
**House Committee: Health Policy**  
**Senate Committee: Health Policy and Human Services**  
**Complete to 12-5-22**

Analysis available at  
<http://www.legislature.mi.gov>

### **SUMMARY:**

Senate Bill 811 would amend the Public Health Code to extend the length of time a temporary license that enables certain individuals to complete the supervised postgraduate clinical experience requirement for licensure as a speech-language pathologist is valid and to allow the temporary license to be renewed for an additional period.

Under the code, an individual seeking licensure as a speech-language pathologist must, among other requirements, complete 1,260 hours of supervised postgraduate clinical experience. If the supervised postgraduate clinical experience is not completed as part of the individual's educational experience, the code and departmental rules<sup>1</sup> allow an individual to apply for a temporary license to fulfill this requirement. Currently, the temporary license is valid for no longer than 12 months and cannot be renewed.

The bill would extend the period for which a temporary educational limited temporary license is valid, from the current maximum of 12 months to a maximum of 24 months. In addition, the bill would allow the temporary license to be renewed for three additional 12-month terms if the applicant continues to meet the code's requirements.

(To be eligible for a temporary license to complete the necessary supervised postgraduate clinical experience, an individual must possess a master's, doctor of science, or doctor of philosophy degree in speech-language pathology acceptable to the Michigan Board of Speech-Language Pathology and submit a plan for the supervised clinical experience on a board-approved form that is signed by a licensed professional who will provide the supervision. The supervised postgraduate clinical experience may be obtained on a full- or part-time basis.)

MCL 333.17609

### **HOUSE COMMITTEE ACTION:**

The House Health Policy committee reported the Senate-passed version of the bill without amendment.

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<sup>1</sup> See R 338.613 and R 338.615 of the Michigan Administrative Code.

## **BRIEF DISCUSSION:**

Speech-language pathologists are licensed under the Michigan Public Health Code and provide an array of services for individuals with communication and swallowing difficulties, from infants in a hospital neonatal intensive care to the elderly. In order to obtain a license as a speech-language pathologist and practice independently, a graduate of a master's or doctoral program must complete 1,260 hours of supervised postgraduate clinical experience.

Currently, the Public Health Code and R 338.613 of the Michigan Administrative Code ("Rule 13") authorize the Department of Licensing and Regulatory Affairs to issue a nonrenewable 12-month temporary license to an individual for the purpose of completing the supervised postgraduate clinical experience. However, until 2021, Rule 13 had allowed the department to issue a two-year educational limited license that could be renewed up to two times, providing up to six years for individuals to complete the required postgraduate clinical experience. The educational limited license is no longer offered, and only educational limited licenses issued before the effective date of the rule change may be renewed for the additional two-year periods.

According to representatives of the Michigan Speech Language Hearing Association, the shortened period in which to complete the 1,260 hours of supervised postgraduate clinical experience is untenable for many recent graduates. Clinical experience can be interrupted by factors outside an individual's control. For example, a medical issue could require a person to take several months off, or a licensed speech-language pathologist providing supervision could have his or her own work hours reduced, making it impossible to complete the required hours within the 12-month time period. Further, many places, including medical practices, are still operating on reduced hours or with reduced staff, making it difficult for people to find an employer willing or able to offer a placement and thus obtain the needed supervision. This could result in recent graduates failing to complete the required hours in time and being unable to obtain full licensure or could incentivize graduates to move to states with more favorable licensing requirements. Meanwhile, as the state's population ages, the number of children on the ASD spectrum increases, and accidents cause brain injuries, the need for qualified speech-language pathologists to provide treatment becomes critical.

The bill would address the issue by expanding the time period an initial temporary license is valid from 12 months to 24 months. In addition, the license could be renewed for an additional 12 months up to three additional times for a total of no more than five years in which to complete the supervised clinical experience. This is one year less than the previous educational limited license provided, but should be sufficient to account for unexpected interruptions that require more time in which to complete the required hours of supervised clinical experience.

## **FISCAL IMPACT:**

Senate Bill 811 would have an indeterminate fiscal impact on the Department of Licensing and Regulatory Affairs, as the impact would largely depend on the choices of individual licensees. Under the provisions of the bill, some licensees would likely choose to renew their educational limited temporary license, which currently has a lower associated fee than the standard license. Under current law, the temporary license is valid for 12 months, but the bill would increase this period to 24 months. It is unclear whether the department would increase the fee to reflect this longer period. The current fee associated with a speech-language pathologist educational limited temporary license is \$102.70 for 12 months, while the total fee for a speech-language

pathologist license would be \$183.80 for 2 years. For reference, as of September 2022, there are 318 active temporary licenses.

**POSITIONS:**

Representatives of the Michigan Speech Language Hearing Association testified in support of the bill. (9-22-22)

The following entities indicated support for the bill (9-22-22):

- Department of Licensing and Regulatory Affairs
- Michigan Health & Hospital Association (MHA)

Legislative Analyst: Susan Stutzky  
Fiscal Analyst: Marcus Coffin

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■ This analysis was prepared by nonpartisan House Fiscal Agency staff for use by House members in their deliberations and does not constitute an official statement of legislative intent.