



Economic Impact Analysis Virginia Department of Planning and Budget

**18 VAC 30-20 –Regulations of the Board of Audiology and Speech-Language Pathology
Department of Health Professions
October 8, 2011**

Summary of the Proposed Amendments to Regulation

The Board of Audiology and Speech-Language Pathology (Board) proposes to repeal Chapter 20 and adopt a revised set of regulations in Chapter 21 to reorganize sections and provisions more logically and with more clarity. Revisions to current regulations include: 1) a change in continuing competency requirements from 30 hours within two years to 10 hours annually, offered by an approved sponsor or provider; 2) a required attestation by an applicant that he has read and will comply with the laws and regulations governing practice, 3) elimination of barriers to provisional licensure in audiology, 4) more explicit rules for patient confidentiality, maintenance of records and violations of professional boundaries, and 5) raise the costs of some administrative fees to recoup the costs of providing those services and more closely align this board's fees with those charged by other DHP boards.

Result of Analysis

The benefits likely exceed the costs for one or more proposed changes. There is insufficient data to accurately compare the magnitude of the benefits versus the costs for other changes.

Estimated Economic Impact

Under the current regulations, in order for licensees to renew their license, they must complete at least 30 hours of continuing learning activities within the two years immediately preceding renewal. At least 15 of those hours must be Type 1. Type 1 activities are continuing learning activities that are offered by an accredited sponsor or organization. The remaining hours may be Type 2, which are defined as “continuing learning activities that may or may not be

approved by an accredited sponsor or organization but shall be activities considered by the learner to be beneficial to practice or to continuing learning.”

The Board proposes to eliminate Type 2 and instead require that licensees complete at least 10 contact hours of continuing learning activities in the year immediately preceding renewal. Continuing learning activities must be activities, programs or courses related to speech-language pathology or audiology, depending on the license held, and offered or approved by an accredited sponsor or organization. “Continuing learning hours in excess of the number required for renewal may be transferred or credited to the next renewal year for a total of not more than 10 hours.” So the number of required hours per year is reduced from 15 to 10; and also since hours can be carried over across years, licensees can arrange their schedules to account for outside events. This is clearly beneficial for licensees.

The Board is not proposing to change the fees for initial licensure or for license renewal. The board is also proposing to raise the costs of some administrative fees to recoup the costs of providing those services and more closely align this board’s fees with those charged by other Department of Health Professions boards. Since most of these fees are voluntary and do not directly relate to obtaining or retaining licensure, the increases are not expected to be unduly burdensome to the regulated community.

Businesses and Entities Affected

The proposed amendments potentially affect the 2870 speech-language pathologists, 456 audiologists, and 98 school speech pathologists licensed in the Commonwealth.

Localities Particularly Affected

The proposed amendments do not disproportionately affect particular localities.

Projected Impact on Employment

The proposed amendments are unlikely to significantly affect employment.

Effects on the Use and Value of Private Property

The proposed amendments are unlikely to significantly affect the value of private property.

Small Businesses: Costs and Other Effects

The proposed amendments are unlikely to significantly affect small businesses.

Small Businesses: Alternative Method that Minimizes Adverse Impact

The proposed amendments do not adversely affect small businesses.

Real Estate Development Costs

The proposed amendments are unlikely to significantly affect real estate development costs.

Legal Mandate

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.04 of the Administrative Process Act and Executive Order Number 14 (10). Section 2.2-4007.04 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 2.2-4007.04 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.