
MARYLAND SOCIETY OF OTOLARYNGOLOGISTS

SUBJECT: House Bill 1112 – Audiology and Speech-Language Pathology Interstate Compact
COMMITTEES: House Health and Government Operations Committee
The Honorable Shane Pendergrass, Chairwoman
DATE: Tuesday, March 10, 2020
POSITION: Unfavorable

The Maryland Society of Otolaryngologists (MSO) represents more than 300 physicians who live and practice in Maryland. Otolaryngologists are physicians who treat the ear, nose, throat, and related structures of the head and neck; most commonly referred to as ear, nose, and throat specialists (ENTs). The medical disorders treated by our physicians are among the most common that afflict all Americans, young and old. They include chronic ear infection, sinusitis, snoring and sleep apnea, hearing loss, allergies and hay fever, swallowing disorders, nosebleeds, hoarseness, dizziness, and head and neck cancer. Otorhinolaryngologists diagnose and treat disorders of the ears, nose, throat, and related structures of the head and neck. Our foremost commitment is to deliver the best patient care.

House Bill 1112 as introduced “*enters Maryland into the Audiology and Speech-Language Pathology Interstate Licensure Compact (ASLP-IC) for audiologists and speech-language pathologists. The bill establishes (1) specified procedures and requirements for audiologists and speech-language pathologists to obtain and maintain a compact privilege to practice audiology and speech-language pathology in a member state; (2) the composition, powers, and responsibilities of the Audiology and Speech-Language Pathology Compact Commission; and (3) requirements related to the oversight, dispute resolution, and enforcement of the compact. The bill is contingent on similar legislation being enacted in nine other states.*”

As we review the proposed actions in the bill, we are concerned that the proposed Interstate Compact for Audiology and Speech-language Pathology will create unintended consequences such as:

- undoing the established licensure process in Maryland and create a compact that puts the protection of the public in the hands of a Multi-State Commission that can override state laws;
- becoming a vehicle for expansion of scope of practice in least restrictive states or seeking state jurisdictions that are the most favorable to actions they would like to take (corporate and otherwise); and
- Unlike the medical licensure compact where a physician must already be licensed to practice in a state, this compact attempts to create and allow for initial universal licensure for two very different professions. We feel a multistate compact is an inappropriate vehicle to use to establish initial licensure, and such licensure should begin within a particular state.
- Language needs to be clearer with respect to Maryland law superseding “Compact Law”, and how conflicts are resolved between Compact States and Maryland State law that protects the health safety and welfare of Marylanders.

The MSO appreciates efforts to increase access to care and ensure sufficient numbers of providers to treat Maryland patients. **We ask that the MSO be included in ongoing discussions** to ensure Maryland’s Board retains their critically important regulation and oversight of their licensees and of those who may come to practice in Maryland under a compact arrangement.

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