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February 17, 2021

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Honorable Janet Buckner, Sponsor
Senate Health and Human Services Committee
Colorado General Assembly
200 E. Colfax Avenue
Denver, CO 80203

Re: Opposition to SB 21, the Audiology and Speech-Language Pathology
Interstate Compact (unless amended)

Dear Senators Fields, Ginal, Buckner and Members of the Health & Human
Services Committee:

The American Academy of Otolaryngology-Head and Neck Surgery (AAO-HNS) is opposed to SB 21, the Audiology and Speech-Language Pathology Interstate Compact (ASLP-IC), as written. This interstate compact contains legislative language that is distinctly different and much broader than most other health professional licensure compacts. This bill proposes a “privilege to practice” concept that is vastly different than the Medical Licensure Compact which is a simple voluntary expedited licensure agreement.

By way of introduction, the AAO-HNS¹ represents physician specialists dedicated to the care of patients with disorders of the ears, nose, throat and related structures of the head and neck, commonly referred to as ENT’s.

The AAO-HNS has identified seven major issues with the ASLP-IC as drafted:

- The power granted to the Compact Commission to **override** state laws.
- The **lack of transparency** of the Commission’s activities.
- A **weak definition and practice statement** on telehealth which does not recognize existing state provisions.
- **Lack of oversight** provisions of the Compact Commission.

¹ The AAO-HNS is the world’s largest organization representing specialists who treat the ear, nose, throat, and related structures of the head and neck. The Academy represents approximately 10,000 otolaryngologist-head and neck surgeons in the United States who diagnose and treat disorders of those areas.

- **Exclusion of physician** board members as delegates to the Commission.
- **Replication of, and lack of recognition of**, existing state provisions that already exempt active-duty military or their spouses from licensure laws.
- The **unknown fiscal impact imposed on the budget of each state** joining the compact. The Commission has the power to determine the fee formula and bind the state to it. Withdrawal from the compact requires a legislative repeal of the compact statute and is not effective until six months after the enactment of the repeal, requiring the state to continue to pay for their membership even after their withdrawal.

Conclusion

Due to the issues and concerns set forth above, the AAO-HNS and the American Medical Association (AMA) have worked jointly with stakeholders in other states to address these issues through **amendments**. We would be happy to work with the sponsors and all other interested parties to establish the appropriate revisions.

Thank you for your consideration of our position and request for revision. If you or your staff have any questions or need additional information, please do not hesitate to contact our State Advocacy team at legstate@entnet.org.

Sincerely,



James C. Denny, III, MD
Executive Vice President/CEO