

ASLP-IC Rules Committee

Summary of Public Comments of Proposed Rules

Introduction

The ASLP-IC Rules Committee is responsible for proposing new rules, amendments to rules, or rescissions to rules adopted by the full Commission in accordance with the Commission's Rule on Rulemaking. The Committee meets virtually approximately monthly. These meetings are open to the public and all meeting agendas are posted on the Commission's website at least seven days prior to the scheduled meeting date. Additionally, all Committee minutes are posted on the Commission's website.

The proposed rules subject to this review were discussed at Committee meetings on January 2, March 12, and April 2, 2026. The Committee approved draft rules for public comment at its meeting on April 2, 2026. In accordance with the Commission's Rule on Rulemaking, the proposed rules were posted on the Commission's website and subject to a period of public comment for thirty days, which commenced on April 28, 2026, and was due to end initially on May 28, 2026. The Commission also notified all member states of the proposed rules and about the period for public comment. In accordance with the Rule on Rulemaking, member states are required to post information and a link to the Commission's website in a conspicuous location. The best source available to the public about proposed rules and public comment periods is the Commission's website.

Due to increased interest about the public comment period, the Commission extended the deadline to June 9, 2026, at 5:00 PM Eastern.

Public Comments Summary

The Committee received and reviewed a total of 51 public comments. 47 comments were received from individuals and four comments were received from organizations. The Committee received no public comments on the proposed rules from its member state licensing boards, who are tasked with the implementation and administration of the Compact according to its terms. The public comment period lasted for a total of 42 days.

Most of the public comments raised the same points and contained similar verbiage. The following is a summary of the public comments and the Committee's response.

Summary of public comments on proposed rule regarding definition of post-graduate professional experience:

- Creates a de facto national standard
- Closely mirrors ASHA's Clinical Fellowship requirements
- States which joined the ASLP-IC did so under broad legislative language requiring postgraduate experience, without specifying any duration in months, weeks, or hours.

Committee's response:

- All compacts require a level of uniformity of entry requirements so that member states can be assured that they are fulfilling their statutory requirement of public protection and not diluting professional requirements in order to join the compact.
- State licensure boards have historically exercised their authority by adopting rules to define post-graduate professional experience requirements. The proposed Compact rules align with the standards already adopted by most states and therefore do not diminish state authority. Instead, they reinforce consistency across jurisdictions by maintaining uniform expectations for post-graduate experience among nearly all member states and the broader national landscape, with only limited outliers. State legislative bodies enact the compact with the expectation that entry level requirements will be maintained.
- The Committee is explicitly authorized and directed under the Compact's enabling statute to establish rules defining both the post-graduate professional experience and the national examination. Accordingly, the rules do not expand statutory authority; they operationalize it in a manner consistent with the authority granted by member states. Similar to state licensing board law and rules, all compacts deliberately leave some details to rulemaking instead of embedding them in the compact. This is done because rules can be revised whereas the compact cannot be revised. If the compact is revised, it must be reenacted in every state. Additionally, member states enacted the Compact with a clear understanding that these details would be developed through the Commission's rulemaking process when actual member state delegates could have a voice in rule drafting and passing of those rules.
- The Committee reviewed existing state licensure requirements to identify the prevailing standard across jurisdictions. The proposed rule for post-graduate professional experience reflects what most states already require. This was true at the time the Compact was developed by a national workgroup of regulators,

legislators, practitioners, and stakeholders, and it remains true today. Thus, the proposed rule defining the post-graduate professional experience aligns Compact requirements to the requirements already adopted by nearly all states.

- The proposed rules do not infringe upon state licensure authority. As with all occupational licensure compacts, the ASLP-IC establishes uniform baseline requirements for audiology and speech-language pathology—standards that are already reflected in most state licensure frameworks. Nearly every state requires nine months, 36 weeks, and/or 1,260 hours of post-graduate professional experience, with only limited exceptions (e.g., North Dakota and Virginia).
- Compact rules regarding this requirement do not prevent member state licensing boards from establishing a different pathway for single state license holders which may have differing postgraduate professional experience requirements.
- Compact participation is voluntary. Compact law and rules only apply to practitioners who want to enter the compact portal.

Other Comments about the proposed rule for post-graduate professional experience

- Remove the word “paid” in Section 7.1 and change “employment setting” to “practice setting” in Section 7.2 (A)

Committee’s response:

- The Committee will recommend removing the word “paid” in section 7.1 and changing “employment setting” to “practice setting” in Section 7.2(A).

Summary of public comments on proposed rule regarding definition on national exam:

- Designating a single exam by name reduces future flexibility, limits alternative pathways to licensure, and further entangles the Compact with ASHA-aligned systems.

Committee’s response:

- The Committee only reviewed state licensing requirements to determine what most states currently require. All states require a national exam. That national exam is currently recognized as the ETS Praxis exam. Thus, like all other compacts, the

ASLP-IC proposed rule defining the national exam aligns Compact requirements to the requirements already adopted by all states.

- The proposed rule defining the national exam does not identify ETS as the sole entity for the exam; the proposed rule includes “predecessor” and “successor” to ETS, which ensures flexibility and alternative pathways to licensure for member states.

Additional comments about the proposed rules:

- Interstate agreements should remain what they were intended to be: agreements between states – not mechanisms through which private organizations extend their institutional influence.

Committee’s response:

- As with many compacts, the ASLP-IC and state licensing boards draw on the same foundational elements for its professions as private organizations —education, experience, and national testing as a validated demonstration of competence— because these are broadly recognized indicators of safe, effective practice in audiology, speech-language pathology and all licensed allied health occupations.
- There are many safeguards in place to prevent private organizations from exerting undue influence within compact commissions. All compact commission meetings are open to the public, unless they qualify under limited circumstances to move into closed session. Further, all compact meeting minutes are published for the public to review. As with all other compacts, the ASLP-IC has affiliated organizations in non-voting ex officio positions. In addition, most compacts, as with the ASLP-IC, receive financial support from their affiliated organizations, which helps sustain operations without imposing excessive participation costs on professionals.

Additional comments about the proposed rules:

- States joined the Compact to achieve licensure portability, not to cede their licensure authority to the Compact Commission

Committee’s response:

- The only authority that member states cede is their right to take unilateral action that would conflict with the compact’s uniform entry requirements. A compact is a statutory contract among states to promote uniformity of entry requirements.

- Compact participation is voluntary. Compact law and rules only apply to practitioners who want to enter the compact portal.

Committee's Recommendation

- Committee will consider action at June 11, 2026 meeting to remove the word “paid” in Section 7.1 and change “employment setting” to “practice setting” in Section 7.2(A) for proposed rule on post-graduate professional experience
- No changes are being considered to proposed rule on national exam.
- Craft FAQ indicating that the postgraduate professional experience only applies to SLPs.
- Craft FAQ for member states on how to have any additional national exams approved by the Commission.
- Upon approval of proposed rules by the Committee, the Committee will report recommendations to the Executive Committee at their next meeting. Upon the Executive Committee's approval, the proposed rules would be considered for approval at the next Special Commission meeting on June 29, 2026.