

Provisional Licensure for 4th Year Au.D. Externs: 09/10/2007

California asks: Does your state require that 4th year students be provisionally licensed and if so, why? Have you considered removing this requirement? If not, are you considering instituting this as a new requirement?

California requires that 4th year students be provisionally licensed as it provides a means by which the student could, theoretically, be disciplined if there were a case of consumer harm. Of course, the requirement was instituted back when the provisionally-licensed person had their MA already. We are considering removing this requirement, but are in the process of information-gathering first.

If you do require provisional licensure, do you have information about whether/how insurance is being billed for the patients that these students see? Do they bill independently, or "under" the supervising audiologist?

STATE:	RESPONSE:
California	<p>I know for sure Medi-Cal requires us to bill with a different suffix (I think it is WV) to make sure they know who performed the test. Also, they want someone "licensed" perform the examination. By removing that provision, we may not be able to bill Medi-Cal if they are seen by the 4th yr AuD.</p> <p>Sol Marghzar, AuD</p>
Florida	<p>Fortunately, Florida does provide for provisional licensure for 4th year students. It is not mandatory, however. In other words, without the provisional licensure, students would require "line of sight" supervision, and could not bill insurance. Whether one argues rhetorically that "students are students" the reality is that 4th year placements are treated as employees. They are commanding "salaries" in the range of ± \$30K and are expected to perform, at least at some point into the internship, semi-independently. Without provisional licensure, they would, indeed, be students, requiring direct supervision and not be able to bill insurance (eg: Medicare does not provide for "incident-to" billing for audiology services if the licensed audiologist is not in the room). Under those circumstances, how could a practitioner be expected to take in and pay a 4th year student? We supported provisional licensure for 4th years in Florida; otherwise it would be impossible to place 4th year students in the state. Additionally, without it, 4th years would essentially be above the law, with no regulatory oversight. In Florida, the provisional license is for a finite time period. All academic, practicum and exam requirements must be met before the license expires. This system in no way implies that it is not necessary to be a fully trained and licensed audiologist to practice. It recognizes the 4th year as a unique transitional period in the audiologist's training, while allowing for regulatory oversight of the</p>

	<p>student-clinician, semi-independent clinical experience and facilitating an economically feasible environment to encourage practitioners to take in 4th year interns.</p> <p>Fred Rahe</p>
Georgia	<p>GA does not have provisional licensure for 4th year. We are, however, having problems w/ the rules being outlined by the Board, and they are requiring 2 months of work in a professional setting b/f licensure. They took a phrase "professional experience" taken from other licensure laws to indicate that the experience be after graduation (the idea being that a student is not a professional). It was intended to mean the experience be in a professional setting. It's kind of a nightmare. We are trying to fix it.</p> <p>Katherine Pollard</p>
Idaho	<p>Idaho does require provisional licensure for employed fourth year students for much the same reasons others on this list serve have stated. The provision requires supervision acceptable to the board, which we generally take to mean on site contact. However, due to the rural makeup of many of the sites in the state, the term 'acceptable to the board' is used to allow a little fudging in areas which may not otherwise have access to services.</p> <p>It bears mentioning that our law is a work in progress as we work through some necessary changes. What we have today may not exist next week!</p> <p>Joe Seitz South Idaho Hearing and Audiology</p>
Maryland	<p>Maryland does not require a student to be licensed. We are currently working on new regulations that a student must be supervised 100% of the time with direct on site supervision. That means the supervisor must be there in the clinic overseeing and available to see the patient at any point. This is will prevent someone working in one location and supervising a student in another location. The supervisor is responsible for the patient and must sign each report with the student.</p> <p>Sharon Sorensen</p>
Massachusetts	<p>We don't have provisional licensure for anyone, and treat the 4th year Au.D. students as students.</p> <p>Barb Morris, Chair Massachusetts Board of Audiologists & Speech-Language Pathologists</p>

<p>Michigan</p>	<p>Michigan has no provisional licenses, and the 4th years are referred to as students or externs.</p> <p>Our lobbyist advised us against it because provisional licensure simply does not exist for any profession in our state and given that we were at a last-chance effort she did not want us throwing that in there. We were facing enough problems with the sudden unexpected surge of complaints from within our own ranks at the time...if it was not bad enough that we had the usual opponents!</p> <p>Noreen Gibbens, AuD.</p>
<p>Minnesota</p>	<p>Minnesota does have a provisional license for 4th year externs. This came about because without it, preceptors and their practices or employers would be committing Medicare/aid fraud if a student had <i>any</i> interaction with a patient that was not direct-line-of-site supervised. In our practice we <i>certainly</i> consider 4th year externs as students, and expect that in the course of this 4th year experience they will move along a continuum from direct-line-of-site supervised to consulted/overseen by their preceptors.</p> <p>Joscelyn Martin, Au.D.</p>
<p>Nebraska</p>	<p>Nebraska has provisional licensure for 4th year AuD students. There was a significant controversy when this was instituted, and again in the last year as we made changes to our licensure law. Much like other states, there are those here who feel it protects the public and those who feel it is not consistent with other similar models of professional education. Our provisionally licensed students cannot bill insurance independently, and their results are billed under a supervising audiologist at our facility.</p> <p>Ryan McCreery</p>
<p>New Mexico</p>	<p>No provisional license, students are students. I agree that the purpose of the licensing board is to protect the consumer. If a student is being supervised or flat out employed by a licensed audiologist, that is the person who is responsible and liable. There will always be debates in audiology, regardless of the topic! That is what makes it so much fun!</p> <p>Jonni McClure, Au.D. New Mexico Speech Language and Hearing Licensing Board</p>

<p>Ohio</p>	<p>Ohio does not have provisional licensure for audiologists although I will admit that the debate about this issue continues amongst some audiologists. There are no plans at present to institute provisional licensure.</p> <p>Regarding the theoretical rationale for a means of discipline for students if they continue to hold provisional licensure. I understand that the licensure board's main objective is consumer protection. However, with the change of role from "supervisor" to "preceptor" for Au.D. students this should not be an issue.</p> <p>Although there was debate about this issue, as a whole the licensure group felt that students are students... in no other medical discipline are students licensed provisionally or otherwise.</p> <p>We have continuing dialogue in our state about SLPs with provisional licensure and billing issues, particularly with Medicaid. Currently through our Medicaid department (and it is clearly not the model!) billing is done under the SLP supervisors name in order to be reimbursed.</p> <p>Erin L. Miller, Au.D.</p>
<p>Vermont</p>	<p>Vermont does have a 4 year provisional licensure.</p>
<p>Wisconsin</p>	<p>In Wisconsin, our new licensure bill will not include a provisional license for fourth year students. Students are students.</p> <p>We believe that the difference between clinical practicum and professional experience is clear.</p> <p>Students engage in clinical practicum and are primarily responsible to their educational unit. Off-campus clinical practicum usually requires an affiliation agreement (contract) between the institution and clinical site specifying the roles and responsibilities of each.</p> <p>Degree holders typically engage in professional experience (e.g., medical residents) and are responsible to their employer. Degree holders are contracted by their employer.</p> <p>Edward W. Korabic, Ph.D.,CCC-A Marquette University</p>