



STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

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GOVERNOR

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Memorandum

DATE: May 10, 2013
TO: Program Directors and Administrators
FROM: Desmond Mitchell, Policy Analyst
Policy, Rules and Board Support Section
SUBJECT: Licensure of Speech-Language Pathologists

On January 13, 2009, Public Act 524 of 2008 took effect and requires the licensure of speech-language pathologists in Michigan. Recently, the Bureau of Health Care Services (Bureau) was informed that many employers, speech-language pathology students, and practicing speech-language pathologists are either unaware of the licensure requirement or confused about a specific licensure issue.

The purpose of this letter is to provide the public and potential applicants with accurate information regarding several licensure issues. The Bureau believes the simplest way to accomplish this is by circulating a list of the questions we frequently receive and the Bureau's response. In your current position, you may be in contact with speech-language pathologists who are unaware of the licensure requirement. The Bureau is requesting that you provide this information to any speech-language pathologists who are subject to the licensure requirement.

Do speech-language pathologists have to obtain a license?

Yes. MCL 333.17609(2) and (3) of the Public Health Code require that individuals currently practicing as speech-language pathologists apply for licensure on or before the expiration of 2 years after the effective date of the rules. The administrative rules that implement the licensure requirements of Public Act 524 took effect on December 7, 2011. Therefore, any individual currently practicing as a speech-language pathologist in Michigan must possess a license by no later than December 7, 2013.

It can take 6-8 weeks for the Bureau to process an application and issue a license. Therefore, the Bureau is encouraging individuals who are currently practicing as speech-language pathologists to apply far enough in advance to ensure their licenses are issued by December 7, 2013. Under the Public Health Code, practicing as a speech-language pathologist without a valid license after that date is a felony and may result in legal proceedings.

I heard that not everyone had to obtain an educational limited license before starting a postgraduate clinical experience. Is this true?

Yes. In order to implement the licensure requirements of Public Act 524, the Bureau had to establish a date for transitioning applicants to the new licensure requirements. The date the Bureau established was January 1, 2012. Individuals who graduated after January 1, 2012 were required to obtain an educational limited license before beginning their supervised postgraduate clinical experience. Individuals who graduated before January 1, 2012 and started a postgraduate clinical experience before April 1, 2012 were not required to obtain an educational limited license. Please note, however, that any individual practicing as a speech-language pathologist in Michigan must possess a valid educational limited license, a limited license for an educational setting, or a full and unlimited license beginning on December 7, 2013.

Do any speech-language pathologists have to obtain a license before the mandatory licensure date of December 8, 2013?

Yes. As indicated in the previous response, an individual who graduated after January 1, 2012 must obtain an educational limited license before beginning a supervised postgraduate clinical experience. Also, a speech-language pathologist who begins supervising a postgraduate clinical experience after January 1, 2012 must obtain a license before he or she begins supervising the postgraduate clinical experience.

The Bureau has received reports that some graduates seeking employment to complete the postgraduate experience have had job offers withdrawn because the prospective supervisor was not licensed. It is perfectly acceptable for a prospective supervisor and supervisee to apply for licensure at the same time and the Bureau will process both applications together. In these situations, the supervisor and supervisee should be aware of the following:

- The supervisor must qualify for licensure in order for the Bureau to issue the supervisee an educational limited license.
- The supervised postgraduate experience cannot begin until licenses are issued to both the supervisor and supervisee.

I heard that speech-language pathologists were deregulated and the licensing requirement eliminated. Why do I have to apply for a license?

On February 17, 2012, the Office of Regulatory Reinvention released a report with recommendations for improving the occupational regulatory climate in Michigan. The report recommended the deregulation of several professions, including speech-language pathologists. However, the deregulation of a profession requires the passage of legislation. To date, no legislation with the intent of deregulating the profession of speech-language pathology has been introduced or passed by the Legislature. Unless legislation is passed for this purpose, the licensure requirements established by Public Act 524 and implemented by the administrative rules will remain in effect.

The Bureau hopes that our responses to these questions will help to reduce or eliminate any confusion regarding the licensure requirements for speech-language pathologists in

Michigan. If you have additional questions regarding the licensure requirements or process, or you would like to obtain license application forms, please visit the Bureau's website at www.michigan.gov/healthlicense. You can also email your questions to bhpinfo@michigan.gov or contact the Bureau's Licensing Unit at (517) 335-0918. Thank you.

A handwritten signature in black ink that reads "Desmond Mitchell". The signature is written in a cursive style with a large, prominent 'D' at the beginning.

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