

**Washington West Supervisory Union
Speech-Language Pathologists**

March 31, 2016

To: Chair, House Committee on Education, Rep. David Sharpe
And members of the committee:

Rep. Bernard Juskiewicz, *Vice Chair*

Rep. Kevin Christie, *Ranking Member*

Rep. Scott Beck

Rep. Sarah E. Buxton, *Clerk*

Rep. Lawrence Cupoli

Rep. Timothy Jerman

Rep. Emily Long

Rep. Ann Manwaring

Rep. Alice Miller

Rep. Kurt Wright

House Committee on Education
Room 32
115 State Street
Montpelier, VT 05633

From: Washington West Supervisory Union Speech-Language Pathologists

Leigh Stockton, MS, CCC-SLP

Noelle Teubert, MS, CCC-SLP

Alison Watt, MS, CCC-SLP

Amy Jamieson, MS, CCC-SLP

Kelly Poulin, MS, CCC-SLP

Ani Lutz, MS, CCC-SLP

Judy Mulhern, MS, CCC-SLP, EEE

Doug McDermot, MS, CCC-SLP

Shelley Swahn, MS, CCC-SLP

Mollie Burke, MS, CCC-SLP

Re: Senate Bill S.217

Position Statement: The Speech-Language Pathologists of the Washington West Supervisory Union are deeply concerned about the removal of the educational Speech Language Pathology (6-84) endorsement from the Agency of Education. S.217, as currently worded, is vague and open to interpretation, and does not ensure the protection for school-based SLPs to perform all aspects of our jobs, nor to function as full members of our educational teams and access our benefits as guaranteed through our status as members of the NEA and our collective bargaining unit.

As Speech-Language Pathologists currently employed by the WWSU, the purpose of this statement is to express our concern with the impact of S.217 as currently written. We want to ensure there is clarity in the language of the bill so that it can appropriately serve our profession, including Vermont's school-based SLPs, without having a wider-reaching, negative impact on Vermont's children, especially those with disabilities.

We are all certified and licensed school-based SLPs, and as such are considered integral and necessary components of our respective schools' teaching staff. We all hold Vermont educator licenses as SLPs, as well as current ASHA (American Speech Language Hearing Association) certification. All SLPs are required to work for a full nine months on a provisional clinical certificate before becoming fully recognized by ASHA. We are clinically trained providers with expertise in communication disorders. In addition to our ASHA certification, educational SLPs are highly trained in special education procedures and laws. Many of us hold, in addition to our Master's Degrees, 45 or more post-graduate-level credits in a wide variety of education topics. We are teachers!

Describing the role of a "teacher" as one who teaches core classes is very narrow. In today's complex world, SLPs work as part of a school-based team that teaches the "whole child." Communication skills are at the core of all learning. Instruction in core academics is key, but for lifetime success, every student also needs to learn how to comprehend the material, be able to express and demonstrate what they know, form positive relationships, and learn to function in society. The goal of the Common Core is to prepare our students for life, and for many students to achieve this, the role of the SLP in the schools is vital.

The relationship between early speech/language delays and literacy disabilities has long been proven. The identification and early intervention we provide is crucial for the educational success of many children. We also have expertise in working with English Language Learners (ELLs), whose population in Vermont is increasing. We are full team members, working closely with other teaching colleagues, to promote the success of all of our students. Our team membership and contribution is as important as that of the science or math teacher.

The job of a school-based SLP is very different from that in a clinical setting. Many of us have been teaching for 20 or more years in Vermont schools. We are SLPs, but our job is no longer simply about teaching children articulation skills (i.e. how to say their /r/s). This aspect of our job has, in fact, become a very small portion of our professional teaching duties. We are strongly aligned with the Common Core, helping students work towards proficiency in written and oral expression, and written and oral language comprehension. We run reading groups; we work closely with school guidance counselors to implement pragmatic language groups. We modify curriculum and differentiate instruction to allow our students with disabilities to access the general curriculum in content areas. As SLPs, we have a vast fund of knowledge in working with children with Autism Spectrum Disorders (ASD); another critical skill-set given the rise in this population in Vermont. We case-manage students, often involving large multi-disciplinary teams. In some schools, SLPs case-manage as many or more students than do special educators. We often are the educators appointed to case-manager students with intensive needs, given our expertise with a wide variety of disabilities and syndromes. As SLPs, we are also certified to work as EEE (Early Essential Education) providers. We are responsible for child-find in our communities. Early identification, assessment, family support and intervention are all crucial elements of our job.

As long-time school employees, we are veteran NEA members, have paid into our teacher's retirement system for decades, and are included under the master teacher's contract. We all work for lower hourly wages than SLPs in private practice; the benefits associated with the professional teacher's contract -- health care, retirement, professional protections such as access to legal counsel-- make this possible. We work in schools because we love teaching and working with children.

We understand that regulation and oversight is necessary to ensure that qualified, credentialed professionals are servicing Vermont's students. This includes providing specially designed instruction that enables students to access the free appropriate public education they are entitled to under the Individuals with Disabilities Education Act (I.D.E.A.). None of this should change with the transfer of our licensure to the OPR. However, the current wording of S.217 may jeopardize this status.

We are concerned that with the introduction of S.217 there may not be adequate provisions to protect our rights to access benefits we are entitled to given the role we assume as teachers in the educational setting. It is crucial that language in this bill guarantees that our licensing through OPR will continue to allow those employed in public schools to access the same benefits we currently have through our Educational Endorsement from the AOE. These include: participation in the Vermont State Teacher's retirement benefit system and access to collective bargaining rights when negotiating contracts (i.e. ability to be part of the Vermont Teacher's Union). We feel strongly that SLPs employed in an educational setting should continue to have the right to maintain our educational endorsement without additional fees, licensing requirements and undue oversight from two regulatory agencies (i.e. AOE and OPR)

Ideally, licensure through only one agency could work if OPR and VSBPE collaborate to ensure that educational SLPs retain all current benefits (bargaining, retirement) and our 84 endorsement, allowing us to work as teaching professionals. That endorsement would be provided by the OPR/AOE of Vermont based on submission of required PL hours. We understand the need to maintain a high level of ongoing professional development and training to be recognized as 'teachers' and are committed to this as professionals. These would necessarily be (at least somewhat) different than PL amassed by SLPs in medical arenas or private clinics.

However, we feel strongly that we should not be subject to three separate regulatory agencies (OPR, AOE and ASHA) on three different cycles for relicensing, each with their own fees. As legislators serving the public please keep in mind that one of the primary purposes of transferring our licensure to OPR through Bill S.217 was "to allow State government to operate in a more effective and efficient manner."

We are SLPs, we are clinicians, but above all we are teachers. We are an integral part of the professional teaching staff of our schools. We share the joys and challenges of all educators. Our work directly impacts student success in so many ways. As professional educators who spend the majority of our working day teaching children, we have and should continue to have equal standing with our educational colleagues. Therefore we deserve to retain our existing benefits regardless of what state agency is providing oversight. We expect to be governed with fairness and efficiency that does not require redundancy, over-regulation and excessive fee structures.

Thank you for your consideration of this statement.