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Testimony of Wendy Teller-Elsberg, Public-School-Based Speech-Language Pathologist
IN FAVOR OF AOE'S CONTINUED DIRECT OVERSIGHT OF THE LICENSURE OF
EDUCATIONAL SPEECH-LANGUAGE PATHOLOGISTS
Before the House Education Committee
March 31, 2016

Esteemed Representatives:

I am an educational speech-language pathologist at Dothan Brook Elementary School in Wilder. My job is to teach children the communication skills they need to be good speakers, listeners, readers, writers, and problem-solvers, in accordance with the Common Core State Standards and federal, state and local public education requirements. I do my work as part of a close-knit community of teachers. We are special educators, classroom teachers, reading specialists, media technologists, counselors, art teachers, and so on, but we are all teachers, both in daily fact and by law. We all share representation in collective bargaining agreements; we all give to and benefit from the Teachers' Retirement System; and we all have historically been licensed and endorsed by the Standards Board for Professional Educators, which is overseen by the Agency of Education. I think there are clear reasons for all of these commonalities. Primary among them is that we all do the same thing, and we do it together: we teach.

School-based SLPs, like all our other educator colleagues, are bound by a vast set of complex and ever-changing professional requirements. These include current knowledge of curricular standards, familiarity with regular and special education law, demonstration of best practices within and among our specializations, supervision of paraprofessional educators, and familiarity with laws concerning child welfare, educational inclusion, and instructional accommodations. It is only right that the knowledge and skills we educational SLPs need are multifarious and always changing, because education, as you know, is intricately tied to every other element of societal success or failure, and because the contexts within which we work are themselves always changing. Changes in technology, society, law, medicine, public safety, developmental psychology and labor all impact the specific nature of our ever-evolving field, yet our mission remains to achieve the highest possible student outcomes within this dynamic world.

Given the complexity of what we school-based SLPs do, our licensing cannot be a rubber-stamp process, nor can it be outsourced to an agency that is unfamiliar with our constantly evolving and interconnected professional expectations. Until recently, the Standards Board has overseen a well thought out, continually updated and internally consistent system that ensured our professional quality. It did so by working closely with the schools that train and graduate us, the districts that employ us, and the Local Service Boards that define the skills, dispositions, and knowledge we must continually demonstrate. This system has always made sense to me, and has served as a guide for me each year as I set my own goals for professional development and improved service delivery. But then the system began to change.

Last year, as I understand it, a discussion emerged about shifting the licensing of school-based SLPs to the auspices of OPR. I must say that despite having read the relevant bills and discussed this proposed move with multiple stakeholders, I remain flummoxed. I have found myself struggling to comprehend the logic behind the shifting of our licensure from an educational body to a non-educational, and far more broad-based, body. I would like to understand what problem is solved in this move. What bureaucratic efficiency is achieved? As far as I can tell, moving school-based SLPs' licensing from AOE to OPR while simultaneously instructing OPR to get ongoing support from AOE to carry out its licensing duties is not cutting any red tape. Or if, as a different permutation would have it, AOE is to continue issuing our endorsements, then what will it actually mean when OPR issues us a license? Will it effectively be a blank piece of paper on which AOE may do the actual writing? Wouldn't it be simpler for AOE to use its own paper? I am sorry to say that I have found myself wondering whether OPR is hoping to divert the revenue stream of educational SLPs' licensing fees from the Agency of Education Licensing Office to its own offices. But less cynically, I want to believe that OPR's interest is truly in governmental efficiency. I simply don't think OPR realizes that what we do may be too complicated for it to take on either efficiently or effectively.

I have an additional concern, which is the fact that many if not most school-based SLPs across our state do not understand what is happening in these halls regarding our licensure. If you are not sure whether I am correct, I urge you to send out a 1-question email survey to all of us, asking simply, "Do you sufficiently understand how and why the process of SLP licensing is changing in our state?" I believe you would be lucky to get even a 20% affirmative response.

I am sorry to say that one culprit in the confusion is our own state professional organization, the Vermont Speech-Language Hearing Association (VSHA), whose members are both educational and non-educational SLPs, but whose stance on this issue, as I see it, disregards the perspective of educational SLPs. I am on the mailing list of VSHA, and have been concerned about what they are telling the SLPs in the state. I have read numerous statements from VSHA asserting that the shift in SLP licensing is beneficial to all those in my profession. VSHA gives two reasons: first, that, and I quote, "OPR is the state's licensing authority, not AOE" and second, that the changeover in licensing is the only possible alternative to our paying two separate licensing fees (one to AOE and one to OPR). Neither of these statements is correct. As you well know, the Agency of Education has long been a licensing body. In fact, The Vermont Standards Board for Professional Educators has been THE licensing body charged with licensing educators, including educational SLPs. VSHA's second line of reasoning, that unless we move to OPR, we will pay two fees, is a false dichotomy, since until last year, we paid just one licensing fee, written out to AOE. As far as I can see, the alternatives to our paying two licensing fees are 1) to return to the licensing process that existed prior to last year's legislation, therefore returning licensing of educational SLPs to AOE, or 2) to move SLP licensing fully to OPR. Under either of those, we would pay one fee.

Yet those two single-licensure scenarios cannot be seen as equivalent. S.217 as written would have moved SLP licensure to OPR and would have left our inclusion in the State retirement system and in collective bargaining agreements at the mercy of cash-strapped school boards. It was only because some school-based SLPs and Vermont-NEA focused attention on these shortcomings that the retirement and labor implications of S217 were recognized, and I am certain that if those issues are not properly addressed in the Senate, we school-based SLPs who are following these developments, along with VT-NEA, will bring these pitfalls to everyone's attention.

More importantly, under the optimal single-licensure scenario, our expertise as educational speech-language pathologists would continue to be acknowledged, monitored, updated, and required in its full and dynamic complexity. In my estimation, that optimal scenario is a return of our licensure to the the Agency of Education. I trust you to identify and support the solution that will be both efficient and effective at upholding our continued professional excellence. Our students' success depends on it.

Thank you.