

Dear Senators:

Recently, a set of concerns has been raised regarding licensing speech-language pathologists in particular and education licensing in general.

I would urge you to avoid shifting licensing responsibilities from education to the Office of Professional Relations. The purpose of such an effort is not clear or transparent. Certainly, unnecessary duplication should be eliminated. The puzzling piece is that any such duplication appears to be a fairly recent result of bureaucratic hegemony.

The more compelling reasoning to set this aside is simple and straightforward. It would be another step toward governmental ossification and hamstringing. Teacher licensing and re-licensing in every endorsement area is critical to providing incentives and disincentives for education improvements and efficiencies. Many have noted that cross-agency cooperation in state government is not as strong as it should be. In the instant case, having the Agency of Education and the OPR responding to every topic that appears to have mutual concerns is not very effective nor efficient.

While OPR has an interest in licensing in general, I do not think they have a full conception of the long history and myriad pieces that are affected in this case. For example, federal teacher improvement funds are distributed to state educational agencies and there are a large number of reporting requirements of some complexity that must come and can only come from education's data base. Teacher evaluation is a part of state and federal law and this is outside the expertise and capacity of OPR.

A definition of the problem would help all of us focus. Perhaps splitting SLP licensing into educational functions and clinical functions and each having their own more precise and tailored license could be mooted. This may have been already considered but the idea is to tailor an efficient and elegant solution to a clearly defined problem. While there is most likely extensive work I have not enjoyed reviewing, I do not see that the fundamental first step has been accomplished.

Thus, I urge that this matter be set aside until we have developed a clearer problem definition and a more robust solution.

Sincerely,

**William J. Mathis, Ph.D.**  
**Chair, Legislative Committee**  
**Vermont State Board of Education**  
[wmathis@sover.net](mailto:wmathis@sover.net)  
**(802) 383-0058**