

Memorandum

To: Members of the Senate Government Operations Committee
From: Lisa Durstin, Vermont Speech-Language Hearing Association (VSHA)
Date: February 17, 2016
Re: S.217

Thank you for the opportunity to testify on this issue today.

Since the last time I testified, the committee heard some conflicting testimony from other SLPs. I want to take a moment to clarify what VSHA's position is on this bill.

1. We continue to support the licensing move of SLPs from AOE to OPR that occurred last year. For the reasons that we stated last year, we believe that OPR is the regulatory body that is most qualified to regulate our profession, not only for our benefit, but also to ensure the safety of those, including the children, whom we serve.
2. We are supportive of standards being set by the Standards Board to ensure that all professionals who work in the schools (not just the 8 professionals who currently receive endorsements) meet certain school-related requirements.
 - a. It is important to note, once again, that not all professionals who work in schools are required to be "licensed" by AOE in addition to their OPR license (for example, Behavior Analysts, Physical Therapists, and Occupational Therapists).
3. We are not supportive of having 2 separate government agencies regulating our profession – it makes not logical sense – there should be one regulatory body, which is currently OPR
 - a. We do not believe there is any statutory authority whatsoever for AOE to license SLPs under Title 16. SLPs used to be licensed by AOE under Title 26. When that licensure was moved (under Title 26) to OPR, no additional statutory language was added that now allows AOE to license us under Title 16.
4. We are not supportive of having to pay fees to 2 separate government agencies based on where we work. Why should all professionals who work in schools have to pay a fee to AOE, in addition to our licensing fee to OPR?
 - a. We do not believe there is any statutory authority whatsoever to charge SLPs fees under Title 16. As noted in our memo to you last month, the only fees SLPs paid to AOE was under Title 26. When SLPs moved to OPR last year, not statutory language was added that allows AOE to charge fees to SLPs under Title 16.

I have heard the testimony from some SLPs and from VCSEA and I would like to comment. I think we are more aligned than one might think after hearing the testimony. I think that we all agree that standards for *any professional* who works in the schools would be prudent. I also believe that standards set forth by any workplace, such as a hospital, nursing home, etc., would also be advisable. We are not advocating for working in a setting, *any setting*, without appropriate standards that are tailored to that workplace.

We believe that the appropriate role of OPR is to perform all the regulatory functions that a regulatory body is entrusted to carry out. We also believe that the appropriate role of the Standards Board, through its endorsements, is to set the standards by which all professionals must abide when working in the schools.

Over the past year, we have been working with our membership to try to clarify these issues. As you know, they are quite complex, and explaining them often had led to misunderstandings. I hope that we can all come to a common understanding and a like mind as we move forward through this process.

As a whole, VSHA has been supportive of the move to OPR, because OPR's is better able to oversee the profession and provide regulatory guidance and structure. Members are generally not supportive of double licensing and fees – they are onerous, costly, and do not provide any additional regulatory oversight. In addition, members have reported challenges they have experienced in working with AOE in its past regulatory capacity.

Thank you for your attention to this matter. We look forward to working with you in resolving these important issues.