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S.217 is a bill about better government and a more streamlined licensing process. It clarifies that professions that are licensed by OPR shall not be double licensed and shall not be charged double fees. S.217 also will preserve participation in the retirement fund and collective bargaining rights for speech-language pathologists who are school employees. Please keep in mind that SLP and audiologist licensing **was already transferred to OPR** in last year’s OPR bill. The question as to *whether* licensing should be transferred was addressed and resolved last year.

Background

Until September 2015, AOE licensed **all SLPs**. Under AOE, all SLPs were given a “Professional Speech Language Pathologist license” (*not* a “clinical license” and an “educator license”, as AOE has implied) and Endorsement 84 was issued to SLPs who worked in schools. Despite the transfer to OPR, AOE is requiring of school-based SLPs a second license, a second fee, and increased CEU requirements. The new AOE licensing, fees, and CEU requirements are much more onerous than they were prior to September 2015, **although no statutes or rules were passed to support these increased requirements**. These onerous changes were created and implemented by AOE without justification, public comment, or input from the profession. And AOE was aware that the licensing was going to be moved but never notified us that they were going to require a second license until after H.282 was passed.

AOE Licensing Requirements for School-based SLPs (pre- and post-September 2015)

	AOE Requirements prior to 9/1/15	AOE Requirements after 9/1/15
License duration	3 years	3 years, but 5 years required if practicing for more than 3 years.
License fee	Equivalent of \$35/year for a total of \$105 for 3 years	Equivalent of \$50/year, plus \$50 processing fee, for a total of \$300 for 5 years
License type	“Professional Speech Language Pathologist” License (same license type for SLPs in school or non-school setting)	Level I license, but Level II license required if practicing for more than 3 years
Continuing education requirements	30 hours for 3 years (equal to what is required for national certification)	45 hours for 3 years or 75 hours for 5 years (beyond what is required for national certification)

License/Standards

SLPs should be regulated by one agency, as indicated in H.282 which passed last year. The Legislature agreed that OPR has the expertise to best regulate SLPs. **We fully support the application of standards contained in Endorsement 84** and support professionals who work in the schools having to obtain an endorsement. It is important to note, however, that *not all school-based therapeutic professionals are required to have an AOE licensed in addition to their OPR license* (i.e., Behavior Analysts, Physical Therapists, and Occupational Therapists).

Fees

Under AOE's scheme, SLPs who work in the schools would have to incur the undue burden of paying two fees. However, the best oversight of SLPs is by OPR as was legislated last year. It will cost \$800 for an SLP to have a license to work in Vermont and be employed by a school, not including the cost of CEUs.

CEUs

AOE is also attempting to require that SLPs obtain more CEU credits but this will not result in any new correlating benefit. This increase did not go through rulemaking or any Administrative Procedures Act process. There was no input from the public or from the profession. SLPs did not receive notice of the intended change and recent rule changes to endorsements did not include SLPs in their list of 14 endorsements subject to amendments.

SLP Training

SLPs differ from classroom teachers. While the main job of a teacher is to be responsible for *what* someone learns, SLPs are trained to be responsible for *how* someone learns. This training transcends all workplaces. All SLPs are provided with essentially the same education and training. We are not educated or trained to work in one setting, such as a school, a hospital, a skilled nursing facility, a preschool, a home, rehab, or a clinic. We graduate with general SLP education. If we work in an area of specialty we might have a little more coursework in that area of interest. We also continue to develop our areas of specialty as we move through our careers and gain additional training/education. We teach memory and word retrieval strategies, we teach swallowing exercises, we teach parents how to facilitate language with their toddlers, but we do it in a specialized way, tailored to the population served. And unlike regular classroom teachers, we work with only a small segment of the school population and our employment is subject to the need for "related services" to be provided by a speech-language pathologist.

VSHA Membership

VSHA members

- were supportive of the transfer to OPR last year - OPR is better able to oversee the profession and provide regulatory guidance and structure, given their expertise in professional regulation;
- feel that AOE double licensing and fees is onerous, costly, and doesn't provide any benefits or additional regulatory oversight;
- report difficult challenges they have experienced in working with AOE in its past regulatory capacity;

- feel that S.217 is an important piece of legislation that will ensure that school-based SLPs can retain their benefits and will allow us to pursue regulation of speech-pathologist assistants.

It is for all the reasons I have stated that we support S.217.