



November 30, 2016

Paul Katnick
Assistant Commissioner
Office of Educator Quality
PO Box 480
Jefferson City, MO 65102-0480

RE: 5 CSR 20-400.604 Certification Requirements for Initial Student Services Certificate

Dear Mr. Katnick:

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 186,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,800 of our members reside in Missouri and approximately 61% work in school settings.

ASHA supports a single license issued by the Missouri Board of Healing Arts (MBHA) for speech-language pathology practice in all settings and commends the Department of Elementary and Secondary Education (DESE) for continuing to honor and require the state license for practice in the schools.

Student Learning and Graduation Requirements

The MBHA license requires a master's degree in communication sciences and disorders (CSD) from a Council on Academic Accreditation (CAA) accredited training program. Accordingly, CAA accredited programs must ensure that students receive the breadth and depth of current knowledge in the field of CSD. Graduates are prepared to work in any setting and through the optional supervised Clinical Fellowship (CF) experience in which they are mentored by an ASHA certified and state licensed speech-language pathologist (SLP) and learn the requirements to practice in their work setting. For SLPs in school settings, this may include developing such skills as scheduling, goal writing, development of an Individualized Education Program, and compliance requirements for federal and state laws and policies as well as local policies and procedures.

Requiring additional coursework to achieve a school credential would be costly and burdensome for graduate students—many of whom are already burdened with considerable student loan debt. Allowing new graduates, as well as individuals who move to the state and possess a state MBHA license, to practice in any setting will help attract professionals to practice in the schools and mitigate the current shortage of SLPs in schools.

University CSD Programs

Accredited programs are required by the CAA to provide a comprehensive and rigorous program of study for CSD graduate students. Requiring additional coursework will not only lengthen the graduate student academic requirement, but will also be costly and burdensome for university

CSD programs. Additional coursework for a school credential may necessitate hiring additional faculty and securing new practicum experiences for CSD programs, which are already facing cuts in funding and shortages in staff and clinical placements.

Current Requirements Nationwide

Eighteen states, including Missouri, require a single state license to practice in any setting and many more states are looking to streamline requirements for practicing professionals. In addition, many of the states that require a single license have reported enhanced recruitment of qualified SLPs into school practice and reduced vacancies in hard to staff areas.

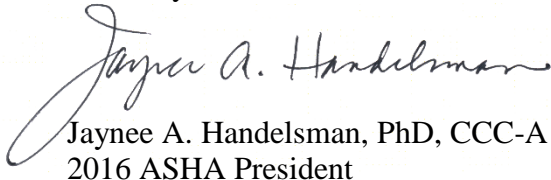
Tenure, Salary, and Retirement Benefits

While changes in the tenure and retirement provisions may be of concern to some in Missouri, a recent ASHA-based survey of our members indicated otherwise. ASHA's 2016 School Survey report, which ranks the top 15 challenges of school based members and was distributed to over 4,000 school-based SLPs, indicated that the primary concerns of school-based members included paperwork responsibilities (85.9%), high workload/caseload size (63.3%), and limited time for collaboration with other professionals (54%). Tenure and retirement benefits did not make the list of challenges and low salaries were ranked 9th at (34%).

ASHA supports a single (MBHA) license for all practice settings. Requiring a single license increases the chances for the recruitment of new and existing professionals, attracts professionals from other states with dual licensure/certification requirements, and helps to alleviate existing shortages in the school setting. ASHA hopes that DESE will consider not only those concerns expressed to MSHA by some commenters, but also of the many SLPs who have indicated their support of a single license. In addition, we believe that requiring additional coursework and a new required school credentialing process will be a setback for the profession and may cause a greater shortage of SLPs who are willing to work in school settings.

Thank you for the opportunity to provide comments. Should you have any questions, please contact Janet Deppe, ASHA's director of state advocacy, at jdeppe@asha.org.

Sincerely,



Jayne A. Handelsman, PhD, CCC-A
2016 ASHA President