



November 30, 2016

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

MSHA's Comments on Proposed Rule 5 CSR 20-400.640 Certification Requirements for Initial Student Services Certificate

Submitted to educatorquality@dese.mo.gov

On behalf of our almost 1,300 members, the Missouri Speech-Language-Hearing Association (MSHA) respectfully provides the following comments on the proposed rule to eliminate issuing the Initial Student Services Certificate for Speech-Language Pathology.

Evolution of Certification and Licensure

MSHA is well aware that Missouri has experienced a noteworthy history in the field of speech-language pathology. We understand that the first DESE credential/certificate, "speech correctionist", eventually evolved into a speech-language specialist certificate in the 1970s. As our profession evolved and expanded into other settings beyond schools (such as private practice, skilled nursing facilities, hospitals, etc.) the Board of Healing Arts licensure was developed and utilized in those settings.

In the same way that the profession expanded in Missouri, national certification standards with the American Speech-Language-Hearing Association (ASHA), involving specific rigorous practicum requirements and competencies, helped drive changes in academic coursework, accreditation of academic programs and DESE approval of those programs. Hence, in the last decade or so, the Board of Healing Arts licensure became the required credential and allowed for the additional DESE student services certificate. Over the years, MSHA has proactively educated its members on the connections between certification and licensure.

While this evolution has occurred over the last 30 years, we recognize that any changes made now in certification would have a significant impact in the next 30 years.

Currently, continued shortages of speech-language pathologists (SLPs) in the schools is a chronic problem for Missouri and is a concern expressed by members of the profession on both a state and national level. Recruitment and retention of SLPs in the public school system is a challenge for all stakeholders. Thus, MSHA supports universal licensure as the required credential for all employment settings as an effort to mitigate these shortages.

In collaboration with other stakeholders and in an effort to disseminate accurate information, MSHA has provided information to its membership regarding the proposed elimination of the student services certificate. While MSHA has received positive comments from members and nonmembers regarding the proposed rule, MSHA recognizes that some

members and nonmembers have expressed concerns and opinions to both MSHA and DESE. MSHA recognizes that expressed concerns should be coupled with recommendations and possible solutions and therefore respectfully submits the following:

Recommendations

1. MSHA recommends further discussion among stakeholders and postponement of the proposed implementation date.

Rationale: Despite efforts among many state agencies to disseminate accurate information about the proposed rule, it appears that there is still confusion and misunderstanding among various stakeholders. While MSHA understands that an extension of the ending date of the current comment period is not necessarily feasible and that further committee discussion will occur after the comment period closes, MSHA recommends further substantial discussion among stakeholders on the topic and postponement of the proposed elimination date. Further discussion and a delay of the currently proposed August 1, 2017 implementation date would be beneficial for all stakeholders, including SLPs, human resources offices, and educational organizations in that a delayed date provides additional time for "official and adequate" communication and education on the topic.

2. MSHA recommends exploration of the development of an optional credential for graduate students or school based working practitioners interested in advancement.

Rationale: In the event DESE would consider a teaching credential as an extra and optional credential beyond the required Board of Healing Arts license, MSHA respectfully requests collaboration among all stakeholders such as DESE, MACCE, Mo-CASE and university programs in determining specific requirements for such an optional credential such as an Educational Specialist Degree. We are cognizant of the extensive time and detail involved in any consideration of changes to teacher education program.

MSHA recognizes that DESE's decisions about certification are rooted in ensuring quality services for students. An optional credential could be developed in collaboration with stakeholder groups such as DESE, MACCE, MSHA, Mo-CASE and university training programs and should include coursework that could be applied to the administrative degree and credential and would necessitate the university CSD programs working with stakeholders (DESE) to develop the applicable coursework. An optional credential would continue to allow new graduates and new hires to be able to work in school settings with an MBHA license. An optional credential such as an Educational Specialist Degree would allow professionals and new graduates a pathway to be considered for management. The coursework could be designed to include courses that could be applied to the administrative credential and it preserves the single licensure requirement for SLP practice in schools.

Thank you for your time and consideration of our organization's comments. We are committed to our continued work with DESE and other agencies on this topic.

Sharon Sowder, MA, CCC-SLP, President
Beth McKerlie, MS, CCC-SLP, President-Elect
Jill Josepher, MS, CCC-SLP, Past President
Pat Jones, MS, CCC-SLP, VP for School Services

MSHA Comments
November 30, 2016

Lynette Vinson, MS, CCC-SLP, VP for Professional & Public Relations
Ashley Fields, MS, CCC-SLP, EdD, VP for Legislative Affairs
Jennifer Stevenson, MHS, EdS, CCC-SLP, VP for Communications
Shatonda Jones, CCC-SLP, PhD, VP for Clinical Services
Amanda Moore, AuD, CCC-A, VP for Audiology Services
Michelle McOsker, BS, Graduate Student Member