



Bill: SB 545 - Primary and Secondary Education - Public School Employees - Salaries

Position: SUPPORT

Dear Chair, Vice-Chair, and Members of the Committee:

The Maryland Speech Language Hearing Association (MSHA) represents speech language pathologists (SLPs) and audiologists in Maryland. MSHA's mission is to elevate and engage its members and strive for excellence in serving those impacted by communication and related disorders, through advocacy, equity, education, interprofessional collaboration, and leadership development.

MSHA strongly supports salary supplements for audiologists and SLPs who possess the ASHA Certificate of Clinical Competence. The Certificate is a "high-quality educator" credential, qualifying these professionals for a minimum salary and a salary increase.

Just like our special education teacher colleagues, SLPs provide direct specialized instruction to students with disabilities. We are responsible exclusively for Individualized Education Program (IEP) communication goals. Audiologists provide a key related service required for students who are Deaf and Hard of Hearing to access school.

Unlike special education teachers, we are not eligible for National Board Teaching Certification, which is the trigger mechanism for salary supplements in the Maryland Blueprint for Education passed by the General Assembly. Therefore, 1,374 SLPs and 22 audiologists in Maryland schools will be excluded from a critical recruitment and retention tool that is desperately needed to best serve Maryland children with disabilities.

The Maryland State Department of Education (MSDE) reports that speech language pathology is currently the third biggest staff shortage area in Maryland schools, with only special educators and general elementary educators in greater demand.¹ This causes significant harm to Maryland students and financial damage to school districts.

¹ MSDE, Maryland's Teacher Workforce: Supply, Demand, and Diversity, 2022.

When students miss speech therapy or audiology services due to staffing shortages, children's developmental and language delays are extended and intensified. Behavior issues develop when students are frustrated and cannot communicate. Elementary students cannot build strong reading, writing, and spelling skills on a poor foundation of language. Older students with disabilities need functional communication skills to transition to the workplace or to maximize their independence.

Despite school districts lacking adequate professional staff, the legal obligations to provide speech therapy and audiology to students with disabilities remain. As a result, school systems contract for expensive virtual services for in-person students, pay out Free Appropriate Public Education (FAPE) compensatory awards for missed services, or agree to expensive private special education school placements due to our failure to provide the required services. On average, it costs local schools about \$40,000 per year to contract out for one SLP versus hiring and retaining a full-time SLP. By passing this salary supplement and hiring SLPs who will be present at the schools and reside in Maryland, local school jurisdictions will save millions of tax-payer dollars.

By granting SLPs and audiologists the salary supplement, we can reduce the fiscal note by millions more statewide. We are unique in this fiscal and educational benefit to the state.

Contractual staffing companies charge between approximately \$550 and \$750 per day for each SLP. Anne Arundel, Prince George's, Baltimore County, Montgomery County, and others have had to resort to contractual virtual services for in-person students, in addition to in-person contractors. They pay for the virtual SLP and paraeducators to sit with students as they Zoom from their classrooms.

MSDE State Complaint Letters of Finding show that families are furious that their children are not receiving speech therapy or being forced to receive virtual services while attending in person due to lack of staff (Compliant # [23-167](#), [23-267](#), [23-239](#), [23-240](#), [23-242](#), [23-272](#), [23-210](#), [23-192](#), [22-080](#), [22-098](#), [22-101](#), [22-097](#), [22-119](#), [22-069](#), [22-045](#), [22-060](#), [22-074](#), [22-123](#)).

If speech therapy services are missed, IEP Teams are required to address it at the next IEP Meeting. School districts provide FAPE Compensatory Awards, or payments to provide the services that were missed. This can easily amount to \$2000 per student. Some families unilaterally enroll their child in a private special education school when the public school misses services, delays assessment, or fails to hold an IEP Meeting because of lack of staff. A year at Gateway, a private school for children with communication disorders, costs approximately \$150,000 per student. Other private special education placements cost much more. If a family disagrees with a speech therapy assessment that was conducted virtually, they can demand an Independent Education Evaluation (IEE), which costs between \$800 and \$1200.

SLPs and audiologists are unique educators in the Maryland public schools because we are required to hold a Maryland Department of Health license. School districts bill Medicaid for every

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therapy session and assessment we conduct. We help bring in federal revenue. **The average speech-language pathologist will bring in \$52,000 in Medicaid revenue per year when providing services to Medicaid-eligible students.**

We urge Maryland to include SLPs and audiologists in the salary supplement framework within our public schools. We are spending millions of dollars beyond what it would cost to simply adequately recruit and staff these positions.

Many states and cities across the U.S. provide salary supplements to teachers who hold a National Board Teaching Certificate (NBTC). Faced with their own shortages of SLPs and audiologists, these jurisdictions have elected to provide the same salary supplements to SLPs and audiologists who hold the American Speech Hearing Language Association's Certificate of Clinical Competence in Speech Language Pathology or Audiology (ASHA CCC-SLP/A). This advanced national credential consists of the same components as NBTC and is more rigorous given the higher education requirement for entry into the profession and continuing education for maintaining the credential.

For example, Kentucky, Indiana, Page United School District in Arizona, and Papillion-LaVista School District in Nebraska give salary supplements to teachers with NBTC and SLPs and audiologists with CCC-SLP/A. Frederick County Public Schools (Maryland) agreed to provide salary supplements to teachers with NBTC or speech-language pathologists with CCC-SLP through the union contract.

The demand for SLPs and audiologists is rising in educational and medical settings. For SLPs, the projected job growth is at 21% through 2031 and 10.6% for audiologists through 2032 per the U.S. Bureau of Labor Statistics. In 2018, more than half (54%) of ASHA Schools Survey respondents reported that job openings for SLPs exceeded job seekers in their employment facility and geographic area. This legislation will help Maryland stay competitive in the job market and make our public schools an attractive place to work for transplants and new graduates.

Given the dire situation, many districts offer straight incentives for speech-language pathologists and audiologists who work in public schools and hold CCC-SLP even if they do not award salary supplements for NBTC. Mississippi, Oklahoma, Arkansas, Nevada, West Virginia, Rhode Island, Delaware, Michigan, North Carolina, multiple school districts in California, and Chesterfield School District, VA all provide salary supplements to those who work in public schools and hold the advance national CCC credential. CCC-SLP/A is a high-quality certification, and additional fiscal recruitment tools are desperately needed in Maryland.

I would refer the Committee to the chart at the end of my testimony comparing NBTC requirements to ASHA CCC-SLP/A. A fair reading of the requirements will show that SLPs and audiologists have equivalent and even stricter requirements than teachers to be awarded national certification and to retain it after the award. These clinicians hold advanced certification and maintain a high level of continuing education. This is the quality of care that children with disabilities in Maryland deserve.

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Thank you,

A handwritten signature in black ink that reads "Megan Miskowski". The signature is written in a cursive, flowing style.

Megan Miskowski, M.S., CCC-SLP

Director of Advocacy and Public Policy

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Comparing the Professions		
	Teacher	Speech-Language Pathologist/ Audiologist
Education Requirement	Bachelor's Degree	Master's or Doctor's Degree
Alternate Career Entry Option (Teach for America, etc.)?	Yes	No
Required Credential	Maryland State Teaching Certificate	Maryland Department of Health License
Continuing Education Requirement for Mandatory Credential	6 Continuing Professional Development credits every 5 years	30 Continuing Education Units every 24 months
Provides direct instruction?	Yes	Yes – per section 300.39 of the Individuals with Disabilities Education Act (IDEA) speech therapy is considered both a related service and specialized instruction; audiology is a related service
Primarily responsible and accountable for teaching the students	Yes	Yes – just like special education teachers, speech-language pathologists and audiologists are responsible and accountable for our students Individualized Education Program (IEP) goals
Comparing the Advanced Credential for National Certification		
	National Board Teaching Certificate (NBTC)	American Speech Language Hearing Association Certificate of Clinical Competence (ASHA CCC-SLP/A)
Exam	National Teachers' Exam	National Speech-Language Pathology or Audiology exam
Peer-Review	Portfolio Review - Video of teaching - Written essays describing teaching	<u>Speech Language Pathologists</u> Clinical Fellowship Skills Inventory - 18 hours of direct observation and 18 hours of indirection observation (review of written work products, etc.) - Review of 21 clinical skills by a fully licensed and certificated speech language pathologist or audiologists <u>Audiologists</u> 2020 Standards for Clinical Certification in Audiology 12 months of fulltime supervised practice with skills competency checks and feedback
Eligibility	3 years teaching	SLP – master's degree (2 years) and completed fellowship (1 year); Audiologist – Doctors Degree (3-4 years)
Maintenance	Complete Maintenance of Certification every 5 years - portfolio submission of two components that are evaluated together and scored holistically.	Complete 30 professional development hours (PDHs) every 3 years. Must include at least 2 hours in cultural competency, cultural humility, culturally responsive practice, or diversity, equity, and inclusion (DEI) and 1 hour in ethics.

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