

Megan Miskowski, M.S., CCC-SLP
Speech-Language Pathologist

March 1, 2023

Senator Brian Feldman, Chairman
Education, Energy & Environment Committee
2 West Miller Senate Office Building
Annapolis MD 21401

Senator Guy Guzzone, Chairman
Senate Budget & Taxation Committee
3 West Miller Senate Office Building
Annapolis, MD 21401

Delegate Vanessa Atterbeary, Chair
House Ways & Means Committee
131 House Office Building
Annapolis, MD 21401

Re: SUPPORT SB 791 / HB 883 – Public School – Job Duties & Salaries

Dear Chairman Feldman, Chairman Guzzone and Chair Atterbeary:

My name is Megan Miskowski. I am a mother and licensed speech language pathologist (SLP) in Maryland. I have worked in Baltimore City Public Schools for almost 15 years. I am a member of the Maryland Speech Language Hearing Association, Baltimore Teacher's Union, and I am a past president of the Association of Baltimore Community Speech Language Pathologists. I teach undergraduate Communication Sciences and Disorders students at the Women's Institute of Torah Seminary in Baltimore, Maryland. I am a doctoral candidate in Speech Language Pathology at MGH Institute of Health Professions. I am writing in favor of SB 791/HB 883.

It is vital that Maryland pass SB 791/HB 883 to ensure adequate staffing of speech-language pathologists in Maryland public schools and maximize our fiscal resources. Through the Blueprint legislation, Maryland now offers salary supplements of \$10,000 and \$17,000 to educators who hold National Board Teaching Certification (NBTC).

Just like our special education teacher colleagues, speech-language pathologists provide direct specialized instruction to students with disabilities and are solely responsible for Individualized Education Program (IEP) communication goals. Unlike our special education teacher colleagues, we are not eligible for National Board Teaching Certification which is the trigger mechanism for salary supplements in the Blueprint. This leaves speech language pathologists out of an important recruitment and retention tool that is desperately needed in Maryland. SB 791/HB 883 will correct this oversight.

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The Maryland State Department of Education (MSDE) reports that speech language pathology is currently the 3rd biggest staff shortage area in Maryland schools (MSDE, Maryland's Teacher Workforce: Supply, Demand, and Diversity, 2022) with only special educators and general elementary educators in greater demand. This not only causes significant harm to Maryland students but also financial damage to school districts.

When districts lack adequate staff, the obligation to provide speech therapy to students with disabilities does not disappear. School systems hire expensive contractors, resign themselves to expensive virtual services for in person students, pay out Free Appropriate Public Education (FAPE) compensatory awards for missed services, or agree to very expensive private special education school placements due to our failure to provide the required services.

In Baltimore City Public Schools, we have 153 full time speech language pathology positions. About 50 of those positions are currently staffed using contractors with an annual budget of \$6 million dollars. On average it costs Baltimore City and other local school jurisdictions about \$40,000 per year to contract out for one speech-language pathologist versus hiring and retaining a full-time SLP. Simply by getting this salary supplement and hiring SLPs who will be present at the schools and reside in Maryland, Baltimore City can save that difference between the extra contractual payments of \$40,000 per SLP, times the number of contracted out SLPs in Baltimore City, 50, for a total savings of over \$2 million dollars alone.

To put it another way, by granting speech-language pathologists the salary supplement, we can reduce the fiscal note by \$2 million dollars in just one jurisdiction alone and millions more statewide. We believe, compared to other 'high-quality educators', 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, and others have had to resort to contractual virtual services for in-person students in addition to in-person contractors. They are paying not only for the virtual speech language pathologist but 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 # 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 Free Appropriate Public Education (FAPE) Compensatory Award which are payments to provide the services that were missed. This can easily be \$2000 per student. Some families unilaterally enrolled 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 cost between \$800 and \$1200.

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Speech language pathologists are unique educators in the Maryland public schools because we are all required to hold a Maryland Department of Health license. School districts bill Medicaid for every therapy session and assessment we conduct. We help bring in federal revenue. In Baltimore City Public Schools, the majority of our student body is Medicaid eligible. We receive approximately \$150 for per assessment and \$25 for every therapy session for every student – sometimes more based on assessment and session type. The average speech-language pathologist in Baltimore City will bring in \$52,000 in Medicaid revenue per year. Unstaffed speech language pathology positions cause compounding financial harm.

When students miss speech therapy because of staffing, the harm is much more than fiscal. 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 in order to transition to the workplace or maximize their independence. These issues have financial harms as well but the damage to our students and their families is so much more.

Maryland must include speech language pathologists in the salary supplement framework. We are spending millions and millions of dollars beyond what it would cost to simply adequately recruit and staff these positions. In short, by granting speech-language pathologists a pathway for the salary supplement, we can reduce the fiscal note in these bills by eliminating the high local education area expenses for contracted out speech language pathologists by millions of dollars.

Many states and cities across the U.S. provide salary supplements to teachers who hold NBTC. Faced with their own shortages of speech-language pathologists, these jurisdictions have elected to provide the same salary supplements to speech-language pathologists who hold the American Speech Hearing Language Association's Certificate of Clinical Competence in Speech Language Pathology (ASHA CCC-SLP). This advanced national credential consists of the same components as NBTC and is in fact 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 all give salary supplements to teachers with NBTC and speech-language pathologists with CCC-SLP. Frederick County Public Schools (Maryland) agreed to provide salary supplements to teachers with NBTC or speech-language pathologists with CCC-SLP though the union contract.

The demand for speech-language pathologists is rising in both educational and medical settings. The projected job growth is at 21% through 2031 per the U.S. Bureau of Labor Statistics. In 2018, more than half (54%) of ASHA Schools Survey respondents reported that job openings for speech language pathologists exceeded job seekers in their employment facility and geographic area.

Given the dire situation, many districts offer straight incentives for speech-language pathologists 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,

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VA all provide salary supplements to speech-language pathologists who work in public schools and hold the advance national CCC-SLP credential. I support MSHA's stance to clearly indicate that CCC-SLP is a high-quality certification within SB 791/HB 883.

I commend to the Committee, the chart at the end of my testimony comparing NBTC requirements to ASHA CCC-SLP. A fair reading of the requirements will show that speech-language pathologists have equivalent and even stricter requirements than teachers to be awarded national certification and to retain it after the award.

Finally, I will share my own personal story. I moved to Baltimore, Maryland from Tallahassee, Florida in 2008 with one year of experience as a speech-language pathologist. I interviewed at medical centers and, after researching the school district pay scales online, contractual staffing companies who would pay me more. I accepted a job with EBS Healthcare based in Pennsylvania. I interviewed and was placed in a position in Baltimore City Public Schools. After a few years, I wanted to become a direct hire with Baltimore City. I'd lost weeks of pay after the back-to-back blizzards in 2010 and knew I'd eventual want maternity leave. I decided that I'd rather have the security of a direct hire position than the extra money I earned as a contractor. Non-compete clauses in my contract with EBS and EBS's contract with Baltimore City Public Schools made transitioning to Baltimore City Schools as a direct hire a multiyear process.

When I transitioned to Baltimore City Schools as a direct hire in 2016, I took a \$10,000 pay cut. My total compensation package with nine years of experience, inclusive of my salary and individual health insurance, was \$77,141. Prior to becoming a direct hire, Baltimore City Schools paid EBS Healthcare approximately \$120,000 for my services. When I became a direct hire, Baltimore City Schools saved \$42,859 and had the same speech-language pathologist they had all those prior years. That year, I took a pay cut and Baltimore City Schools saved \$42,859.

Even today, in my current position, I am one of the highest paid speech language pathologists in Baltimore City and my family of four is on my health insurance. My total compensation package, inclusive of healthcare, is \$99,035.92. I am a highly skilled, specialized staff member with years of experience. Baltimore City Public Schools will spend almost \$21,000 more to Columbus or Stepping Stones Staffing on a brand new speech language pathologist fresh out of graduate school who is not even eligible for CCC-SLP.

This situation is repeating itself hundreds of times across Maryland. In Baltimore City, increasing just a portion of positions currently staffed by a contractor to a direct hire would easily cover the salary supplement for all of the eligible direct hire speech-language pathologists in the district. Maryland schools must close the pay gap.

SB 791/HB 883 will help Maryland stay competitive in the job market and make our public schools an attractive place to work for transplants and new graduates. In the original Blueprint legislation, specific professions were excluded from qualifying for the salary supplements and speech-language pathologists were *not* one of them. We are uniquely positioned because unlike other related services, speech therapy is considered specialized instruction under the Individuals with Disabilities Education Act (IDEA).

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The need in speech language pathology is also greater - we are the 3rd biggest staffing shortage area in all of Maryland schools. On average, districts will save at least \$40,000 for every staff that is hired directly versus getting that same clinician through a contractual agency. Decreasing the use of contractual SLPs, virtual services, compensatory FAPE awards, out of district placements, independent education evaluations, and maximizing our Medicaid billing easily offset the salary supplements for speech language pathologists in our public schools who hold the national CCC-SLP certification. 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.

Thank you,

A handwritten signature in cursive script that reads "Megan Miskowski".

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Comparing the Professions		
	Teacher	Speech-Language Pathologist
Education Requirement	Bachelor's Degree	Master'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 (CPD) credits every 5 years	30.0 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
Primarily responsible and accountable for teaching the students	Yes	Yes – just like special education teachers speech-language pathologists 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)
Exam	National Teachers' Exam	National Speech-Language Pathology exam
Peer-Review	Portfolio Review <ul style="list-style-type: none"> - Video of teaching - Written essays describing teaching 	Clinical Fellowship Skills Inventory <ul style="list-style-type: none"> - 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 pathologists
Eligibility	3 years teaching	Masters Degree (2 years) and completed fellowship (1 year)
Maintenance	Complete Maintenance of Certification every 5 years which consisting of a 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.