



February 10th, 2025

Bill: HB 551/SB 517 - 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 and audiologists across Maryland. Collectively, we elevate and engage members to strive for excellence in serving those impacted by communication and related disorders through advocacy, equity, education, interprofessional collaboration, and leadership development. We are in support HB 551/SB 517, which would include audiologists and speech-language pathologists (SLPs) who possess the ASHA Certificate of Clinical Competence, under the alternative high-quality educator credential, making them eligible for a minimum salary as well as a salary increase.

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. Audiologists provide a key related service required for students who are Deaf and Hard of Hearing to access school. 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 the 1,374 speech language pathologists and 22 audiologists in Maryland schools out of an important recruitment and retention tool that is desperately needed in Maryland.

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.

Maryland Speech-Language-Hearing Association
140B Purcellville Gateway Drive, Suite 120
Purcellville, VA 20132
301-304-7001
info@mdslha.org
www.mdslha.org

When districts lack adequate staff, the obligation to provide speech therapy and audiology 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. On average it costs 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, local school jurisdictions will save millions of tax-payer dollars.

To put it another way, by granting speech-language pathologists and audiologists the salary supplement, we can reduce the fiscal note by 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, Montgomery 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. This problem will not improve without action. (Compliant # [24-186](#), [24-203](#), [24-210](#), [24-239](#), [24-282](#), [24-233](#), [24-286](#), [24-224](#), [24-131](#), [24-159](#), [24-119](#), [24-123](#), [24-125](#), [24-153](#), [24-167](#), [24-174](#), [24-044](#), [24-066](#), [24-068](#), [24-060](#), [24-062](#), [24-093](#), [24-094](#), [24-104](#), [24-049](#), [24-061](#), [24-064](#), [24-076](#), [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 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 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.

Speech language pathologists and audiologists 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. The average speech-language pathologist will bring in \$52,000 in Medicaid

revenue per year when providing services to Medicaid-eligible students. Unstaffed speech language pathology positions especially cause compounding financial harm.

When students miss speech therapy or audiology services 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 and audiologists in the salary supplement framework within our public schools. 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 and audiologists 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 and audiologists 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 and audiologists, these jurisdictions have elected to provide the same salary supplements to speech-language pathologists 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 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 give salary supplements to teachers with NBTC and speech-language pathologists 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 though the union contract.

The demand for speech-language pathologists and audiologists is rising in both educational and medical settings. For speech language pathologists, 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 speech language pathologists exceeded job seekers in their employment facility and geographic area. HB 551/SB 517 will help Maryland stay competitive in the job market and make our public schools an attractive place to work for transplants and new graduates.

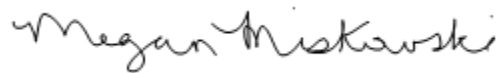
Given the dire situation, many districts offer straight incentives for speech-language pathologists and audiologists who work in public schools and hold CCC-SLP even if they do not award salary supplements for NBTC. Mississippi, Oklahoma, Arkansas, Nevada, West Virginia, Rhode Island,

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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. It is clear that CCC-SLP/A is a high-quality certification and that additional fiscal recruitment tools are desperately needed in Maryland.

I commend to the Committee, 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 speech-language pathologists 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.

Thank you,

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

Megan Miskowski, SLPD, 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	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
Eligibility	3 years teaching	SLP - Masters Degree (2 years) and completed fellowship (1 year); Audiologist – Doctors Degree (3 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.

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