

Proposed Rule Change to Eliminate SLP Student Services Certificate

The November 1 Missouri Register includes a proposed rule change that would eliminate the SLP Initial Student Services Certificate. This proposed rule change will delete the following text from the current rules effective August 1, 2017 –

[(F) The Initial Student Services Certificate for Speech-Language Pathologist (Birth - Grade 12), valid for a period of four (4) years from the effective date of the certificate, will be issued to those persons meeting the following requirements:

7. Professional Requirements—

A. Possession of a master's or higher degree in Speech-Language Pathology from an accredited college or university; and

B. Possession of a valid, unencumbered, undisciplined Missouri license in Speech-Language Pathology from the Missouri Board of Registration for the Healing Arts.]

If this amendment is adopted as final rule, Speech Language Pathologists (SLPs) will no longer need to apply for nor be able to obtain an initial Student Services Certificate as they begin work in the schools. New SLPs will work under their state license issued by the Board of Healing Arts just as other professionals do such as nurses, clinical psychologists, social workers, OTs, PTs, etc. **Those SLPs who already hold a DESE SLP credential (the Student Services Certificate or a previous SLP certificates such as the Speech Language Specialist certificate) will continue to hold/renew that credential.** While the proposed rule does not have an effective date identified, the action approved by the State Board has a proposed effective date of August 1, 2017 which will be included in the final rule.

This proposed change is the end result of a long evolution of the DESE SLP credential. There was a DESE SLP teaching certificate before there was a state SLP license and for decades the two credentials were separate and distinct. However, about 15 years ago a decision was made to issue the DESE credential based only on holding a valid Missouri SLP license issued by the Board of Healing Arts. Over time, holding a valid state SLP license became the only way to obtain the DESE SLP credential and the DESE SLP certificate became a credential with no substance. DESE currently has little to no ability to discipline or manage the SLP credential as it has no real content of its own is simply issued as a "tag along" to a valid license.

Newly hired SLPs working under their state license will be part of the PEERS retirement system rather than PSRS. Since many SLPs work in employment settings outside of public schools at some time in their career, the PEERS retirement system (as a social security supplemental system) may be a better fit for them. School staff and administrators responsible for personnel in districts who employ SLPs should proactively consider how to ensure appropriate and equitable salary schedules are available for SLPs in their district when some will have a DESE credential and others will not. It is important to remember that currently districts likely have SLPs with a variety of different credentials, DESE, Board of Healing Arts and ASHA.

Stakeholders are encouraged to submit comments that include clear recommendations to address concerns (e.g. if the desire is to keep a DESE credential then how should a credential be established that is actually issued by and controlled by DESE?) Districts might also want to make comments on the proposed effective date of August 1, 2017. Will that provide sufficient lead time to ensure all personnel policy adjustments can be understood and implementing effectively? Comments are due by 11/30/16 and can be submitted by email to educatorquality@dese.mo.gov.

A short Q&A is found on the next page responding to questions already asked about the proposed change.

1. It appears the language of the proposed amendment will only affect Initial Student Services Certificates for SLPs. If so, does that mean SLPs who already have an Initial Student Services Certificate will still be able to upgrade to a Career Continuous Certificate?

Correct, this change only ends issuance of the Initial SLP Student Services certificate. Existing certificates will be eligible to move to the Career Continuous and other prior existing certificates (old Speech Language Specialists and even Speech Correction) will still be valid.

2. If SLPs have already been contributing to PSRS and have earned years in PSRS toward retirement, will they be allowed to stay within the PSRS system as full members (no social security) instead of switching mid-career to PEERS?

Yes, clarification has been issued by PSRS working with the Missouri Social Security Administrator that affirms SLPs with a DESE credential who are working one of the two common core data codes for SLPs (usually 195500) will continue to be eligible to remain in PSRS as a full member (no social security).

¹See below for full text of PSRS clarification.

3. Will SLPs who have and maintain Student Services Certificates remain eligible for tenure?

Nothing will change for those SLPs who hold the DESE credential and yes, they will continue to be covered by tenure provisions. New SLP hires without the DESE credential will not be eligible for teacher tenure.

4. If SLPs wish to serve districts in other capacities (e.g., Special Education Process Coordinator), will they still be considered appropriately certificated? As of now, the requirement to be a Special Education Process Coordinator is to hold "Any Special Ed certificate with Graduate Degree."

The requirements for a Process Coordinator are established by the Office of Special Education via State Plan. Discussions are underway to revise that requirement so that SLPs and perhaps even OT's or other related services providers who do not hold a DESE credential can serve in the position of "process coordinator". Unfortunately, the SLP Student Services Certificate was never accepted as a "teaching certificate" to satisfy the requirements of many administrative certificates (including sped administrator). So even currently an SLP who wants an administrative certificate has to get some other teaching certificate to be eligible for an administrative credential and that will continue to be the case for new SLPs also.

5. Can all SLPs stay on a teacher salary schedule, even those without the DESE credential?

Salary schedule decisions are made at a district level. Some districts have SLPs on a teacher salary schedule now and others do not. Some districts have separate "therapist" salary schedules, others do not. These are all decisions made at a local level and thus all options are available to use at district discretion. The critical issue would seem to be to ensure that any salary schedule applied to SLPs are equitable based on credible differences in position responsibilities and not simply holding the DESE SLP credential or not especially since the DESE SLP credential has had no substance of its own for many years.

¹ From PSRS –

DESE is proposing that it discontinue issuing new SLP certificates as of August 1, 2017. According to DESE, if a member already has a SLP certificate, he or she may continue to renew the SLP certificate. The member would continue to be certificated and would remain in PSRS as long as the member continues to hold and renew the SLP certificate.

If the member continues to renew his or her SLP certificate and remains in his or her current position (according to the DESE position code; e.g., DESE position code 195500), the proposed rule change should have no effect on the member. The member will remain in PSRS as long as the member renews his or her SLP certificate. Also, according to DESE, the proposed rule as written should not have an effect on the member's current position or DESE position code. So, according to the State Social Security Administrator, the proposed rule change should not require any current PSRS member to be considered a 2/3 PSRS member and participate in Social Security.

There may be members with SLP certificates who are currently in PSRS 2/3 positions and who participate in Social Security. This proposed rule change should have no effect on those members. They would remain as 2/3 PSRS members and continue to participate in Social Security as long as they continue to renew their SLP certificates.

Of course, a member could change from a full PSRS position to a PSRS 2/3 position (or vice versa), but that change would be due to moving to a different position and not due to the proposed rule change.

Finally, if the proposed rule is enacted as written, it may be possible for new district employees to be hired into a position that previously required an SLP certificate (e.g., DESE position code 195500). If that person does not have any DESE certificate, he or she would be a member of PEERS due to lack of a DESE issued certificate regardless of the position in which the person is employed.

Again, this is a proposed DESE rule change that could be further amended or withdrawn. The proposed rule change is in the comment period for the remainder of November.