

CSHA

NEW SCHOOL SLP CREDENTIALS

CTC credentials for SLPs aligned to CCC Designed to maintain \$35 million a year in Medi-Cal funds for schools

R. Powell Oct 10, 2006

On January 1, 2007, the California Commission on Teacher Credentialing (CTC) is expected to begin issuing a new two-stage school Speech-Language Pathology (SLP) credential system consisting of:

- 1) Preliminary Speech-Language Pathology credential; and
- 2) Professional Clear Speech-Language Pathology credential.

The CTC "Preliminary" SLP credential will be similar to the California SLP Temporary license utilized by masters degree SLP graduates when completing their nine-month monitored (i.e., *supervised*) experience year. This new beginning CTC Preliminary SLP credential will align to the ASHA Certificate of Clinical Competence or CCC Clinical Fellow or CF period as well as to the California SLP Temporary License I Required Professional Experience or RPE period.

The CTC Professional Clear SLP credential is to be issued to those who have completed their masters degree SLP program, passed the national written Praxis exam, and completed the nine-month monitored experience period, based upon ASHA standards. University training SLP programs will continue to be required to have dual ASHA CAA and CTA program accreditation approval.

Existing CTC credentials authorizing speech, language, and hearing services, shall continue to be valid, subject to renewal requirements. These existing credential holders may upgrade to the new SLP credentials subject to the revised requirements.

School SLP credential alignment with the ASHA CCC and state SLP license is a result of urgency legislation, AB 2837 (Baca) signed by the Governor on 9/28, 2006. AB 2837 provisions become operative on the date that the California Attorney General issues a legal opinion that this new CTC SLP professional clear credential is equivalent to the ASHA CCC for purposes of the federal law [*CFR 440.110*].

AB 2837 Chapter 581 of 2006 which adds a new Education Code Section 44265.3, can be downloaded at: www.leginfo.ca.gov/. CSHA will announce the AG opinion to implement AB 2837, as soon as the opinion is issued.

Why new CTC SLP credentials?

AB 2837 officially sponsored by the Los Angeles Unified School District USD, was a collaborative effort supported by CSHA and other major school organizations. Why?

First, AB 2837 was to assist in maintaining up to \$35 million federal Medicaid dollars for California special education programs a year. With this year's failure to increase federal IDEA funding and the Governor's refusal this year to fully fund special education cost of living funds, federal dollars the state receives for SLP services under the Medicaid program are desperately needed.

For several years, California schools have interpreted the Medicaid SLP personnel requirement [*CCC or equivalent state licensing*] as being satisfied by the "academically equivalent" CTC credentialing, and/or by way of the federal SLP authorization to provide services "*under the direction of*" as a general supervision rule.

Earlier this year, the federal Center for Medicare and Medicaid Services (CMS) required the state to obtain a state Attorney General (AG) "equivalency" ruling. On April 24, 2006, the AG Opinion No. 06-104 by Deputy Attorney General Dan Stone ruled that the CTC credential was not equivalent to the ASHA Certificate of Clinical Competence. At that point, major school districts asked what was involved in

alignment of the CTC credential for SLPs with the CCC. Upon discovering that most new graduates are already passing the national written Praxis exam as well as agreeing that new graduates should be monitored and assisted in their first year anyway – provisions for AB 2837 were discussed with CSHA and legislation was fast-tracked. Amendments were discussed until the very end of the legislative session to insure that CTC supported this legislative effort. The last amendments were dated August 16th prior to final legislative floor votes that sent the bill to the Governor.

CSHA's Goals for SLP Personnel Standards - Simplification

For many years, CSHA has suggested that the existing systems for speech-language pathologists were duplicative, cumbersome, complicated, and unnecessary. Why should new graduates from the same masters degree SLP program have to jump through three systems – all based upon the same basic training program? A new SLP graduate most likely will be filing out application forms and submitting multiple document requirements for these three separate systems.

While some speech-language pathologists think of themselves as medical vs educational SLPs (or visa versa), all SLPs have basic competencies for all age groups. Licensed SLPs are seeing infants, preschoolers, children in medical settings, etc. Not unlike other professions, SLPs desiring to specialize require additional education, training and experience to gain specialized competencies.

In 1999, CSHA sponsored legislation for reciprocity between the three SLP personnel standard systems of SLP licensing, CTC credentialing for SLPs, and ASHA CCCs. Compromise legislative provisions resulted in the California Business and Professions Code 2532.8(a) for SLP licensing equivalency based upon the CCCs, and for the California Education Code 44831 authorizing public schools to employ or contract with licensed SLPs.

CSHA's goal in 2007

New training programs

New local school/University "internships" with local school scholarships & training funds

State and federal student loan forgiveness funding

Bachelor training programs to add 70 hours of clinical experience

Simplify SLPA licensing for bachelor SLP program graduates

Simplify SLP state standards system

- **Licensing system only with grandfathering of all school SLP credential holders?**
(Or reciprocity between CCCs, licenses & credentials?)
- **Create licensing provisions for local school/University "internship" category?**
- **Eliminate speech aides?**

CSHA's goal in 2007 is to return to the legislature and in partnership with other stakeholders, address personnel shortages of speech-language pathologists. Along with other key issues such as funding and expansion of SLP training programs, is the issue of a simplified state SLP personnel certification system.

SLP assistants need further legal recognition from various state programs such as DDS Early Start and Medi-Cal. Bachelor degree SLP program graduates need a simplified licensing application process to become a SLP assistant. Returning and part-time graduate students need internship and scholarship programs. SLP students and graduates need to be included in the state's student loan forgiveness programs. Retirement restrictions need exemptions for SLPs desiring to work during retirement. Electronic licensing application and e-signature recognition are needed for faster and easier application processing.

Should the profession have reciprocity between almost identical systems (*licensing, CTC credentialing and CCC certification*) -- or move to a single state system for SLPs as in some other states? If licensing only, what of grandfathering existing CTC credential holders? What education provisions and programs would school licensed SLPs need to have legislative inclusion (*i.e., permanent status with school tenure, teacher bargaining unions, STRs retirement, etc.*)?

The CSHA Board of Directors and other CSHA leaders are currently exploring suggestions and options on the above issues. Your suggestions and assistance is encouraged and welcomed. Comments can be forwarded to your CSHA district Director, CSHA Officers or Commissioners, or to CSHA's Advocate – all at csa@csa.org.