

COMMISSION ON TEACHER CREDENTIALING

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OFFICE OF THE EXECUTIVE DIRECTOR

94-9411

June 7, 1994

To: Persons Interested in Information Relating to the Clinical Rehabilitative Services Credentials in Language, Speech, and Hearing and Audiology and State Licensure Requirements

From: Philip A. Fitch, Ed. D., Executive Director

Re: New policy requiring the Master's degree for all new Clinical or Rehabilitative Services Credentials in Language, Speech, and Hearing and in Audiology, effective in 1995.

Professional Renewal Requirements for all new Specialists and Services Credential Holders as of July 1, 1994.

Implementation of the California Department of Education State Plan for Special Education provisions for "upgrading" existing credentialed speech and language specialists who do not hold a Master's Degree.

School districts, county offices of education and colleges and universities should notify all current holders of the Clinical or Rehabilitative Services Credential in Language, Speech, and Hearing and Audiology that they will continue to be authorized in the areas specified by their credentials and candidates currently enrolled in preparation programs should be notified of the pending changes in the requirements for the credential. It is important to note that the Master's requirement discussed in this memo is both a new credential requirements *and* an employment issue related to the federal regulation requiring use of a highest standard in each state.

Background on Compliance with Federal Regulations

The Commission on Teacher Credentialing has worked with the California Department of Education (CDE) over the past three years to respond to the United States Department of Education, Office of Special Education Programs (OSEP) to address concerns raised by OSEP regarding California's compliance with the personnel standards requirements of the Individuals with Disabilities Education Act, as reflected in California's Part B State Plan for Fiscal Year 1991-1993.

Federal regulation requires the California Department of Education to submit a three year plan on special education to meet the requirements of Part B of

the Individuals with Disabilities Education Act (IDEA), Public Law 94-457, in order to receive the state's allocation of funds from the federal government. California's share of the federal contribution for special education programs is approximately \$208 million annually, depending on the special education pupil count. The regulations require states to submit plans for a statewide comprehensive system of personnel development to ensure that only fully qualified personnel provide services to individuals with disabilities.

Federal regulations adopted in 1989 require that all states use their own "existing highest standard" in the state for a profession providing similar services to children and youth with disabilities. The federal regulations have designated the Business and Profession Code as the highest standard for all language, speech, and hearing specialists and audiologists, not the Education Code. These regulations are outlined in the next section of this correspondence.

The state must submit a plan to indicate the specific steps that state is taking to retrain or hire staff who meet the "highest standard" requirement, including those who may hold temporary or emergency certification in the state. If a state's standards are not based on the highest requirements in the state applicable to a profession, as is the case in California with emergency permits and waivers, the state plan must include steps the state is taking for retraining or hiring of personnel to meet appropriate professional requirements in the state. The CDE and the California Speech and Hearing Association (CSHA) are collaborating to develop a plan to meet the highest standard requirement.

State Licensure vs. Credential Requirements

The California Department of Consumer Affairs, Board of Medical Quality Assurance, oversees the licensing of speech and language specialists through the Speech Pathology and Audiology Examining Committee. State licensure is required to work in private clinics, hospitals, and in private practice.

To be eligible for licensure as a speech pathologist or audiologist in California, the applicant must possess all of the following qualifications:

(a) Possess at least a *master's degree* in speech pathology or audiology from an educational institution approved by the committee *or qualifications deemed equivalent* by the committee.

(b) Successful completion of at least 60 semester hours of courses related to the normal development, function, and use of speech, hearing, and language; and courses that provide information about, and training in, the management of speech, hearing, and language disorders. At least 24 semester units shall be in the field for which the license is sought.

(c) Completion of supervised clinical experience with individuals representative of a wide spectrum of ages and communication disorders, not

to exceed 300 clock hours, of supervised clinical experience necessary for such applicant.

(d) No less than nine months of satisfactorily completed supervised full-time experience or 18 months of part-time experience obtained under the supervision of a licensed speech pathologist or audiologist or a speech pathologist or audiologist having qualifications deemed equivalent by the committee.

(e) Pass an examination approved by the committee, usually the National Teachers Examination (NTE) specialty examination in Speech Pathology or Audiology.

To be eligible for a Clinical or Rehabilitative Services Credential the applicant must:

(a) Possess baccalaureate degree or higher degree from an institution approved by the commission.

(b) Completion of an approved program of professional preparation including basic generic coursework related to child growth and development, the fundamental bases of language, speech and hearing, and basic knowledge of language, speech and hearing disorders and the assessment thereof, and advanced specialization coursework in audiology or language, speech and hearing, including principles and procedures used in individual and group remediation, theories of learning and behavior, and the organization, administration and supervision of programs designed for direct and supportive services. The special class authorization is in addition to the advanced specialization.

(c) At least 300 clock hours of supervised clinical practice with language, speech, and hearing handicapped minors, of which at least 200 hours must be with minors and at least 100 hours must be performed in a public school or school of equivalent status. All clinical practice must also be supervised by properly certified individuals in language, speech, and hearing disorders;

(d) Passage of the California Basic Education Skills Test (CBEST).

New Policy Requiring the Master's Degree for the Credential

Satisfying the federal requirement that all professionals have equal standards required the Commission to acknowledge the existing highest standard for future graduates of credential programs in speech and hearing. The nine month internship is not applicable to the Commission as it is related to employment, and is not professional preparation standards issue.

Requiring the Master's degree in the future for all newly credentialed language, speech and hearing specialists and audiologists will not require any change in the law since Education Code Section 44268 requires a baccalaureate or higher degree. However, the use of the National Teachers Examination (NTE) specialty examination in Speech Pathology and Audiology requires the

Commission to adopt these examinations for certification purposes. The Commission plans to form a task force to review the specifications of the National Teachers Examinations in Speech Pathology and Audiology to determine the validity of the examinations for use in California in the near future.

In addition, new standards for the professional preparation of all special education related areas, including the Clinical or Rehabilitative Services Credential, are currently being developed by an expert panel. The standards will be subject to public comment sometime in 1995. It is anticipated that the new standards will become effective during 1995-96.

Specialist and Services Credential Renewal Requirements

Specialist and services credentials *initially issued* on or after July 1, 1994 will be subject to renewal requirements every five years. Individuals renewing these credentials will be required to complete professional growth activities and provide evidence of having performed service in a professional capacity. The credentials affected by the new renewal requirements include:

Specialist Credentials:

Agriculture
Bilingual Crosscultural Instruction
Early Childhood Education
Health Science
Mathematics
Reading
Special Education

Services Credentials:

Administrative
Clinical or Rehabilitative
Health
Library Media Teacher
Pupil Personnel

For specialist and services credentials issued on or after July 1, 1994, the holder will be subject to the following requirements at five year intervals:

- Complete an individual program of professional growth that consists of a minimum of 150 clock hours of participation in activities that contribute to competence, performance, or effectiveness in the profession of education.
- Serve successfully in a certificated position or another professional capacity related to the credential area for at least one-half of a school year.
- Submit to the Commission a completed credential application form and fee, the Professional Growth Plan and Record, and the Verification of Successful Service.

Many persons applying for specialist and services credentials will already hold a basic teaching credential, and may already be subject to renewal requirements for that credential. Persons renewing *more than one credential* will be required to complete only *one* set of renewal requirements in a five year cycle. Professional growth and professional service requirements may be satisfied in a single credential area or in a combination of credential areas. All renewable credentials for a single individual will be renewed on the same five-year cycle.

The new regulations were developed with the assumption that professional renewal requirements for future recipients of specialist credentials and services credentials should be (a) appropriate for these groups of professional educators, and (b) parallel and (as much as possible) equivalent to the renewal requirements that have been established for holders of Multiple and Single Subject Teaching Credentials. Therefore, rather than develop a separate set of regulations governing the specialist and services credentials, the current regulations for Multiple and Single Subject Credential renewals were amended to reflect two similar, but slightly differing requirements and procedures for each of the two types of credentials. Existing regulations for Multiple and Single Subject Credential renewals will not be affected by these changes.

To renew a specialist and services credential, the holder must serve successfully in (a) a certificated position or, (b) another professional capacity related to the credential area(s) for the equivalent of at least one-half of a school year during the five year renewal cycle. This service must be performed in a public or private preschool, elementary school, or secondary school, or in related educational settings serving children, youth, (birth to 22) and families (§80565).

For persons renewing multiple credentials, the service performed may be in any of the credential areas being renewed. Such service may be performed in a single credential area or in a combination of credential areas. The service requirement for all credentials being renewed will be satisfied with this experience (§80552).

Implementation of CDE State Plan for Upgrading of Current Credential Holders without a Master's Degree

The intent of the federal regulations is to ensure that only fully qualified personnel provide services to handicapped children in schools. The state plan must include steps the state is taking and the procedures for notifying public agencies and personnel of those steps and the timelines it has established for the retraining or hiring of personnel to meet appropriate professional requirements in the state. The target date of September 1995 has been set for the upgrading of standards for credential holders in speech and hearing and a target date of the year 2000 to eliminate the need for emergency

certification in the state. The CDE and CSHA will oversee the identification and professional development speech and hearing specialists and audiologists currently employed in the schools without a Master's degree.

The federal regulations are directed to those serving as speech and language therapists and audiologists but *do not* include those serving as special education *classroom* teachers. Special class teachers for students with speech and language disabilities hold the Clinical Rehabilitative Services Credential in Language, Speech and Hearing, including the Special Class Authorization or the Special Education Specialist Instruction Credential in Communication Handicapped—Speech and Language emphasis.

Results of a 1993 Commission survey reveal that a majority of the candidates in speech and hearing programs earn a Masters degree when working toward a Clinical Rehabilitative Services Credential in Language, Speech and Hearing. The preparation programs are so comprehensive that few, if any, additional requirements are needed when work toward the credential has been completed.

The additional requirements of the federal regulations are not seen as a concern for a majority of credential candidates who plan to earn ASHA certification. Most California programs are geared toward ASHA standards, the national organization that accredits both training programs and practitioners. ASHA now requires a Master's degree and the NTE in Speech Pathology or Audiology for the Certificate of Clinical Competence so California credential candidates interested in seeking national certification usually need to complete a comprehensive examination and a thesis.

The current Emergency Clinical Rehabilitative Services Credential in Language, Speech and Hearing, including the Special Class Authorization, which has been operative since 1991, will not be issued initially after 2000. Only renewals of the existing emergency credentials will be issued after this date which require six units a year (for each renewal) to demonstrate movement toward completion of the Clear Clinical Rehabilitative Services Credential. These individuals may serve as a speech and language specialist or a special day class teacher of students with speech and language impairments.

The existing timeline for termination of the emergency permit, the new CTC waiver policies, and the requirement of the Master's degree should demonstrate the state's intent to meet the requirements of the federal regulations. The attached information outlines the CDE and CSHA procedures to be implemented to identify those speech and hearing specialists and audiologists without a Master's degree who are currently in the schools.

Further Information and Inquiries

The attached page relates to upgrading to a Master's or equivalent. Contact the CSHA office for further written information at (916) 921-1568 or FAX (916) 921-0127.

Further information regarding the renewal of specialist and services credentials will be published in the next revision of *The California Professional Growth Manual*. Inquiries concerning these new regulations may be directed to Dr. Carol Bartell (916) 322-3544.

Tentative Timeline for Changes in Credential Requirements and Upgrading to the Master's Degree for Speech and Language Specialists and Audiologists Currently Employed in the Schools

1994

June Institutions to notify credential candidates of pending change in requirements for Clinical Rehabilitative Services Credential in Language, Speech and Hearing and Audiology.

California Department of Education, Special Education Division and California Speech and Hearing Association (CSHA) form task force to oversee upgrading to the Master's degree to meet federal requirements.

July Professional Renewal Requirements effective for all specialist and services credentials initially issued on or after July 1, 1994.

September Notice to the field on available professional growth/continuing education activities to obtain Master's equivalency.

1995

Draft Standards of Program Quality and Effectiveness for all Special Education Specialist and Clinical Rehabilitative Services Credentials professional preparation programs to be released for public comment.

September All credential programs to require the Master's degree for the Clinical Rehabilitative Services Credential in Language, Speech and Hearing and Audiology.

APPENDIX

Part 34 C.F.R. 300.153 - Assistance to States for Education of Handicapped Children Subpart B - Personnel Standards

a) As used in this part :

(1) "Appropriate professional requirements in the State" means entry level requirements that--

(i) Are based on the highest requirements in the State applicable to the profession or discipline in which a person is providing special education or related services; and

(ii) Establish suitable qualifications for personnel providing special education and related services under this part to children and youth with handicaps who are served by State, local, and private-agencies;

(2) "Highest requirements in the State applicable to a specific profession or discipline" means the highest entry-level academic degree needed for any State approved or recognized certification, licensing, registration, or other comparable requirements that apply to that profession or discipline;

(3) "Profession or discipline" means a specific occupational category that --

(i) Provides special education and related services to handicapped children under this part;

(ii) Has been established or designated by the State; and

(iii) Has a required scope of responsibility and degree of supervision.

(4) "State approved or recognized certification, licensing, registration, or other comparable requirements" means the requirements that a State legislature either has enacted or has authorized a state agency to promulgate through rules to establish the entry-level standards for employment in a specific profession or discipline in that State.

(b) (1) Each state plan must include policies and procedures relating to the establishment and maintenance of standards to ensure that personnel necessary to carry out the purposes of this part are appropriately prepared and trained.

(2) The policies and procedures required in paragraph (b)(1) of this section must provide for the establishment and maintenance of standards that are consistent with any State approved or recognized certification, licensing, or other comparable requirements that apply to the profession or discipline in which a person is providing special education or related services.

(c) To the extent that a State's standards for a profession or discipline, including standards for temporary or emergency certification, are not based on the highest requirements in the State applicable to a specific profession or discipline, the State plan must include steps the State is taking and the procedures for notifying public agencies and personnel of those steps and the timelines it has established for the retraining or hiring of personnel to meet appropriate professional requirements in the State.

**ASSISTANCE FOR UPGRADING
LANGUAGE, SPEECH & HEARING SPECIALISTS
WITHOUT A MASTER'S DEGREE**

The California Department of Education Special Education Division (SED), the California Commission on Teacher Credentialing (CTC), the California Speech-Language-Hearing Association (CSHA), the American Speech-Language-Hearing Association (ASHA) as well as California Council of University Training Program Directors (Communication Disorders) have agreed to provide assistance to school speech-language pathologists (SLPs) without a Master's degree who need to upgrade to a "deemed equivalent" highest state standard.

As a first step, the California Speech-Language-Hearing Association will assist in establishing a SLP data base for information dissemination. Contact CSHA to participate in the data base and receive follow-up information at 916/921-1568, FAX 916/921-0127 or by mail at 825 University, Sacramento, CA 95825.

A joint effort will be made to develop and approve workshops, seminars, conferences and university sponsored courses (including university extension courses) leading to a "deemed equivalent" status. A wide range of upgrading opportunities will be the focus of the state Special Education Division and the profession over the next few of years. These activities should also be of interest to those new professionals interested in satisfying CTC's new professional development requirements.

Please caution all personnel that while this several-year upgrading effort is to satisfy the California State Plan for Special Education, federal requirements and to protect federal special education funding, all involved parties are committed to a workable and productive program that will benefit individual professionals, school programs and most of all, children challenged with communicative disorders.