

**PENNSYLVANIA SPEECH-LANGUAGE-HEARING ASSOCIATION**

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July 12, 2004  
Re: Continuing Education 16A-6802  
June 7, 2004

Sandra Matter, Administrative Assistant  
State Board of Examiners in Speech-Language and Hearing  
PO Box 2649  
Harrisburg, PA 17105-2649

Dear Ms. Matter:

Thank you for the opportunity to review and comment on the proposed continuing education requirements for Pennsylvania licensed speech-language pathologists, audiologists and teachers of the hearing impaired. Overall, the requirements appear reasonable. Upon review of the draft text, it appears clarification of several items would prove beneficial to those directly impacted by this legislation. As a result, clarification of the following items in the final document would be most helpful.

**Clock hours**

- In that the term "clock hours" is equivalent to time measurement terms used by providers of continuing education, clarification of the term with respect to the conversion to other time measurements such as credits or CEUs. For example, a continuing education "clock hour" is equivalent to .1 continuing education unit (CEU) within the continuing education system for the American Speech-Language-Hearing Association.

**Fees**

- Are the listed approved continuing education providers required to submit payment for each approved course?
- Is the application fee for the approval of a continuing education course required once, regardless of the number of times the course may be offered by the same provider?

**Renewal Requirements**

Timely communication to inform licensees of the new requirement, approved documentation forms for recording continuing education activity and established processes for providers of continuing education are not clearly stated in the document.

- In that these requirements can not be effective with the beginning of the 2004-2006 renewal cycle, when do they become effective?
- Will the full complement of 20 clock hours be required for 2006 license renewal?
- How will the board assure that all professionals are made aware of the new continuing education requirement?
- Will there be provider training provided to assure accurate and complete retention of continuing education participant information?

### **Exemption and Waiver**

For new licensees, the absent requirement for continuing education until their first "renewal" is not clear (example: initial license qualification for a new licensee six months before the required renewal date). In addition, for renewal licensees (those being reactivated within a renewal cycle), it is unclear regarding the volume of continuing education required before the next renewal date.

- To assure understanding, will new/renewal licensee education be provided?

### **Reporting and Retention of Completed Education**

Provider storage of five years of records will prove most challenging to providers of a large volume of continuing education.

- In that Board approved forms are to be used for reporting continuing education, are all records to be maintained in a "hard copy" format?

The timing for the availability of the Board approved forms for both providers and licensees is unclear.

- Will the forms be available at the time of the continuing education activity or will both licensee and provider need to wait to complete the specified forms at the time of an audit request?

Retention of this information could prove burdensome and costly, especially for high volume providers.

- Will an electronic system be available and could both licensee and provider enter the required data as each activity occurs or is completed?

Exact requirements for providers to attain approved status, retain information and submission processes are unclear.

- In that providers are required to submit a course approval number or an indication of the provider's status, there is confusion with respect to the exact status of those who may wish to be a continuing education provider (see "Fees" comments above).
- Will there be a set format and/or form for providers' retention requirements?
- Upon receipt of an audit request, how long will the licensee and/or provider have to submit requested information?
- What submission format will be acceptable?
- To whom or what office will continuing education participants and providers direct questions, concerns and requests?

The opportunity to comment on this document is very much appreciated. Please do not hesitate to contact me with questions, comments or requests you may have.

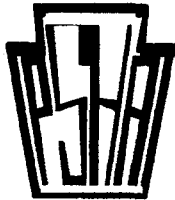
Very truly,



Marjorie DeBlander, MS CCC/SLP  
Vice-President, Governmental Relations  
Pennsylvania Speech-Language-Hearing Association  
404 Winter Street  
DuBoistown, PA 17702  
Phone: 570-220-9972  
Email: [Marjorie.DeBlander@GenesisHCC.com](mailto:Marjorie.DeBlander@GenesisHCC.com)

Copy:

Mr. John Jewett  
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Original: 2406

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Leadership for Public Education

July 19, 2004

Ms. Sandra Matter, Administrative Assistant  
State Board of Examiners of Speech-Language  
and Hearing  
P.O. Box 2649  
Harrisburg, PA 17105-2649

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PO Box 1724  
Harrisburg, PA 17105-1724  
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www.psea.org  
James R. Weaver, *President*  
James P. Testerman, *Vice President*  
Grace E. Bekaert, *Treasurer*  
Carolyn C. Dumaresq, *Executive Director*

Re: Comments, Proposed Rulemaking 49 Pa. Code Ch. 45

Dear Ms. Matter:

The Pennsylvania State Education Association opposes the amendments to Chapter 45 proposed by the State Board of Examiners in Speech-Language and Hearing unless they are revised to take into account existing law.

PSEA, which represents hundreds of speech therapists, teachers of the deaf and hard of hearing, and audiologists working in public schools across the Commonwealth, must oppose these amendments. We do not oppose the amendments because they require continuing professional education, but because the requirements proposed to 49 PA. Code Chapter 45, duplicate the continuing professional education requirements of Act 48 of 1999 which affect all licensed speech pathologists, audiologists and teachers of deaf and hard of hearing students who also hold Pennsylvania certification.

On November 23, 1999, Governor Tom Ridge signed into law House Bill 8, now known as Act 48, which changes the requirements for maintaining an active Pennsylvania professional educator certificate. Act 48 requires ongoing studies throughout each educator's career. More specifically, Act 48 requires all Pennsylvania educators holding PA public school certification to participate in ongoing professional education; such professionals must obtain six credits of collegiate study; six credits of continuing professional education courses; 180 hours of continuing professional education programs, activities or learning experiences; or any combination of credits or hours equivalent to 180 hours every five years to maintain active status.

Many speech pathologists, teachers of the deaf and hard of hearing, and audiologists are both licensed and certified in the Commonwealth of Pennsylvania. Certification is required in order to work in our schools in these capacities; however, many professionals holding these jobs are licensed also so they can work in non-school positions. Additionally, these professionals must be licensed in addition to certified, in order that their schools can collect ACCESS funds (Medical Assistance) for services rendered.

To simplify, a teacher of the deaf must earn 180 Act 48 hours or 6 collegiate courses every 5 years. In order to keep her license active, if these amendments were to pass, she would also have to successfully complete 20 clock hours of continuing education as a condition for each two year renewal period. In five years this would add it to be approximately 50 clock hours of CPE for her license and 180 hours for her certificate. That's 230 hours!

**The PSEA Mission**

*To advance quality public education for all students while fostering the dignity and worth of members through collective action.*

Affiliated with the National Education Association



Page Two  
July 19, 2004  
Ms. Sandra Matter

It is imperative that language be inserted into the revised regulation which credits hours earned for Act 48 certification purposes for licensure as well. Speech pathologists, audiologists and teachers of the deaf and hard of hearing who hold both licensure and certification should need to complete only Act 48 requirements for both licensure renewal and certification purposes.

Sincerely,

A handwritten signature in cursive script that reads "Liz Stanley-Swope".

Liz Stanley-Swope, Director  
Disability and Gifted Issues

cc: Independent Regulatory Review Commission

Original: 2406



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July 19, 2004

RECEIVED

Leadership for Public Education

Ms. Sandra Matter, Administrative Assistant

State Board of Examiners of Speech-Language  
and Hearing

P.O. Box 2649

Harrisburg, PA 17105-2649

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HEALTH LICENSING BOARDS

400 North Third Street

PO Box 1724

Harrisburg, PA 17105-1724

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Liz Stanley-Swope, Director  
Disability and Gifted Issues

cc: Independent Regulatory Review Commission



Original: 2406

(6)

July 19, 2004

Ms. Sandra Matter, Administrative Assistant  
State Board of Examiners of Speech-Language  
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P.O. Box 2649  
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2004 JUL 27 AM 8:33

REVIEW SECTION

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