



**CCSESA**

# California County Superintendents Educational Services Association

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February 11, 2015

Dr. Mary Vixie Sandy

Executive Director

Commission on Teacher Credentialing

1900 Capitol Avenue

Sacramento, California 95811

Dear Dr. Sandy,

On behalf of the California County Superintendents Educational Services Association (CCSESA), I am writing in support of the proposed amendments contained in Item 6A of the February Commission meeting agenda. The proposed amendments would help rectify several of the unintended consequences that resulted from the adoption of Item 4A in October 2014, and are necessary to ensure students in special education settings whose IEPs call for speech language pathologists are provided with the resources and instructional quality they require.

Since October's action on this issue, the severity of the SLP shortage in the state has become evident, and was quantified in a letter sent to you by Jenny Teresi of the San Bernardino County Office of Education. Given the extent of the SLP shortage, it is imperative that the Commission accept enrollment and progress in an out-of-state ASHA-accredited graduate level SLP program as sufficient for the initial issuance or reissuance of the SLP Variable Term Waiver (VTW). As Ms. Teresi's letter stated, California SLP programs are often forced to deny fully qualified applicants due to nothing more than a shortage of space. In such cases, out-of-state programs, such as Northern Arizona State and Nova Southeastern, have become essential in keeping the SLP pipeline to California employers alive.

In addition, we strongly support the proposed amendment that would allow candidates currently enrolled and making progress in an acceptable SLP program who have received 4 or more issuances of the VTW prior to January 1, 2015 to be granted the time and additional waivers necessary to complete their program. I understand that this set of candidates was not considered when the Commission established the five/seven total limit for number of SLP VTW reissuances, and appreciate that actions are being taken to correct the oversight.

In a letter dated March 1, 2012, I suggested that the Commission examine staffing shortages and ways to address the pipeline problems that often put less than highly qualified instructors in the classroom, especially in special education settings. Few instructional areas face the crippling shortages of the SLP pool, and it is critically important that the Commission take action to alleviate that strain so that students receive the highly specialized instruction they are legally entitled. We strongly urge approval of the proposed amendments to the criteria for the initial issuance, reissuance and number of allowable reissuances of the SLP Variable Term Waiver, as stated in Item 6A.

Sincerely,

Peter Birdsall, Executive Director