

## ADMINISTRATIVE RULES

### Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected		2. Date
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Chapter PI 34, Educator Licenses		
4. Subject Creating a pre-student teaching school setting exception for the speech-language pathologist license		
5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S		6. Chapter 20, Stats. Appropriations Affected
7. Fiscal Effect of Implementing the Rule <input type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget		
8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses <b>(if checked, complete Attachment A)</b>		
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s.227.137 (3)(b) 1., Stats \$0		
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137 (3) (b) 2., Stats.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
11. Policy Problem Addressed by the Rule The proposed rule updates s. PI 34.023, Wis. Admin. Code, to provide flexibility for students completing educator preparation programs leading to a speech-language pathologist license under s. PI 34.0475, Wis. Admin. Code, by aligning state requirements with the standards of the American Speech-Language-Hearing Association (ASHA). Specifically, the rule allows these students to complete their pre-student teaching clinical experiences in a wider range of settings so long as the placement meets ASHA requirements. Additionally, the rule permits supervision in pre-student teaching by individuals certified under ASHA standards in lieu of Wisconsin licensure under ch. PI 34, Wis. Admin. Code. These changes aim to enhance program flexibility and ensure that students are prepared for the varied contexts in which speech-language pathologists practice.		
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments The department held a preliminary public hearing and comment period on the scope statement for the proposed rule. As provided in the hearing notice, any comment received during the preliminary public hearing and comment period are also considered for the development of this economic impact analysis. However, no comments were received to be considered in the development of this economic impact analysis.		
13. Identify the Local Governmental Units that Participated in the Development of this EIA None.		
14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) State:  The proposed rule is not anticipated to result in a significant fiscal impact at the state level. The changes primarily involve aligning existing requirements for pre-student teaching clinical experiences in speech-language pathology programs with national ASHA certification standards. This alignment provides greater flexibility to educator preparation programs, which may reduce administrative burdens associated with maintaining separate compliance pathways for licensure. Over time, the improved alignment may help stabilize or modestly grow the workforce of		

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licensed speech-language pathologists in Wisconsin, potentially reducing state costs associated with filling high-need service gaps in public schools.

#### Local:

At the local level, the proposed rule may offer modest economic benefits by helping school districts more easily recruit and retain licensed speech-language pathologists. By streamlining preparation pathways, the rule could increase the number of fully credentialed professionals eligible for employment in Wisconsin schools, thereby reducing the need for emergency licensure and addressing speech-language pathologist shortages. Local education agencies may benefit indirectly from a more robust and better-prepared candidate pool, leading to improved student outcomes and more efficient use of educational resources dedicated to recruitment. Additionally, educator preparation programs may experience cost savings from redundancy in clinical training structures. However, the exact fiscal impact of this rule change is dependent on individual behavior and cannot be determined at this time.

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#### 15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule

To provide options for preparation programs looking to align ASHA and DPI requirements, the rule change permits students to complete their pre-student teaching experiences in alignment with ASHA requirements. Without a rule change, the department would be required to implement ch. PI 34, Wis. Admin. Code, as the rules currently exist, any individuals seeking a license to work as a speech-language pathologist would be required to meet pre-student teaching experience requirements as laid out in the current rule, in addition to any ASHA requirements that may be different from the rule.

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#### 16. Long-Range Implications of Implementing the Rule

The long-range implications of preparing this proposed rule include improved alignment between state licensure requirements and national certification standards, specifically those set by the American Speech-Language-Hearing Association (ASHA). By allowing pre-student teaching clinical experiences to satisfy both DPI and ASHA standards, the rule change would streamline the preparation process for speech-language pathology candidates, reduce redundancy in training requirements, and potentially attract more qualified individuals to the field. This alignment could enhance the quality and consistency of services provided in public schools, expand the pool of licensed professionals, and better meet the needs of students requiring speech-language services across Wisconsin.

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#### 17. Compare With Approaches Being Used by Federal Government

Section 300.34 (a) of the Individuals with Disabilities Education Act regulations includes speech-language pathology services as a related service with respect to educating a child who has a speech or language impairment. Under the 34 C.F.R. s. 300.34 (c) (15), speech-language pathology services include the identification of children with speech or language impairments, diagnosis and appraisal of specific speech or language impairments, referral for medical or other professional attention necessary for the habilitation of speech or language impairments, provision of speech and language services for the habilitation or prevention of communicative impairments and counseling and guidance of parents, children, and teachers regarding speech and language impairments.

However, because education in the United States is typically governed by each state and local government, the Act does not address how states administer the licensure of speech-language pathologists as a related service. As such, states are permitted to choose how to license speech-language pathologists who provide services to children with an individualized education plan.

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#### 18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

**Minnesota:** Speech Language Pathologists in Minnesota are only eligible for Tier II or higher licensure. The clinical experience of an applicant must meet the requirements set out by ASHA including completing 400 hours of supervised clinical experience, with at least 375 hours in direct contact with patients or clients. MN. Admin. Rules 8710.0313, subp. 2.C(1) and 8710.6000

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**Michigan:** Michigan speech-language pathologists must complete a minimum of 300 hours of supervised practicum experience with individuals who present a variety of communication disorders. 150 of those hours must be at the graduate level. MARSE R 340.1796

**Illinois:** In Illinois, licensure in speech-language pathology is an endorsement attached to the Professional Educator License. It can be obtained with one-year of professional experience in PK-12 schools on a valid and comparable out-of-state certificate or license, by holding a license in speech-language pathology with a current Certificate of Clinical Competence from ASHA, or by completing a MS-SLP degree with a 150-hour school-based professional experience. These individuals are also required to be licensed through the Illinois Department of Financial and Professional Regulation.

**Iowa:** Iowa requires speech-language pathologists to complete student teaching or an internship as part of the professional education sequence.

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