

## 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) PI 34, Educator licenses	
4. Subject Speech-language pathologist licenses	
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 checked="" 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 Chapter PI 34 governs the licensure of school personnel, including speech-language pathologists who may be authorized by holding a tier I, 1-year renewable license or a tier II, 3-year renewable license issued by the department. Under the current rule, applicants who wish to hold a tier I or tier II license in speech and language pathology must hold a valid speech-language pathologist license issued by the department of safety and professional services. However, the eligibility criteria for a tier I speech-language pathologist to move to a tier II license needs clarification to ensure transparency. The proposed rule change will specify the pathway for licensees who hold a tier I speech-language pathologist license to become eligible for a tier II license. The proposed rule also makes technical changes to the rule to conform the rule's terminology with current terminology for speech-language pathologists. Without a rule change, the Department would be required to implement PI 34 as the rules currently exist.	
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. No comments received 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) Local: The proposed rule creates flexibility around licensing rules for speech-language pathologist, including additional pathways to tier II licensure. The effect of the proposed rule will ensure greater transparency for applicants seeking licensure. It is not possible to predict how many applicants would take advantage of the flexibilities offered in this proposed rule as these options depend on individual behavior. Therefore, the economic impact of this rule is indeterminate.  State: None.	

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

The proposed rule creates a pathway for licensees who hold a tier I speech-language pathologist license to become eligible for a tier II license. The proposed rule also conform the rule's terminology to current terminology in the field of speech-language pathology. Without a rule change, the Department would be required to implement PI 34 as the rules currently exist.

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

The proposed rule clarifies and creates flexibility around licensing rules for speech-language pathologists, including additional pathways to tier II licensure. The effect of the proposed rule will ensure that high quality is being maintained in the profession while clarifying the means in which applicants may obtain licensure.

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

Section 300.34 (c) (15) of the Individuals with Disabilities Education Act includes speech and language pathology services as a related service with respect to educating a child who has a speech or language impairment. Under the Act, speech and language pathology services are taken to mean 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)

**Illinois:** The Illinois State Board of Education (ISBE) provides credentials to speech-language pathologists who work in the public schools. To obtain an endorsement for licensure as a speech-language pathologist in Illinois, the applicant must obtain a master's degree or higher from a regionally accredited institution of higher education, proof of completion of a State Approved Program, 150 hours of supervised, school-based professional experience that consists of activities related to aspects of practice addressed in the content area, completion of coursework addressing methods of teaching exceptional children, reading methods, content area reading, and methods of teaching English learners.

**Iowa:** Iowa has two licensure options for speech-language pathologists who wish to work in an educational setting. Individuals with a professional service license, issued by the Iowa Board of Educational Examiners, are authorized to serve as a speech-language pathologist to students from birth to age 21. Alternatively, the applicant may obtain a Statement of Professional Recognition from the Iowa Board of Educational Examiners, to practice as a speech-language pathologist in the educational setting, with an Iowa Department of Public Health license.

**Michigan:** The Michigan Department of Licensing and Regulatory Affairs registers speech-language pathologists licensed in the state. To obtain licensure as a speech-language pathologist in Michigan, the applicant must obtain a master's or doctoral degree from an accredited educational program, 1,260 hours of a supervised postgraduate clinical experience, and a passing score on an exam acceptable to the Board of Speech-Language Pathology.

**Minnesota:** The Minnesota Speech Language Pathology and Audiology Advisory Council oversees licensure for individuals authorized to provide speech-language services to prekindergarten through grade 12 students with identified communication disabilities including those affecting language, articulation, fluency, and voice. To obtain licensure as a speech-language pathologist in Minnesota, the applicant must have: 1) a master's or doctoral degree from a Council on Academic Accreditation in Audiology and Speech-Language Pathology or equivalent accredited program. If completing a doctoral program in which a master's degree has not been conferred, an applicant must submit a transcript showing completion of coursework equivalent to or exceeding a master's degree; a letter from the program director may also be required; 2) clinical experience as required by American Speech-Language Hearing Association, the American Board of Audiology, or an equivalent as determined by the commissioner; and 3) passage of the national examination in speech-language pathology or audiology.

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