



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

December 15, 2008

The Honorable Michael J. Astrue
Commissioner of Social Security
6401 Security Boulevard
Baltimore, MD 21235

Dear Commissioner Astrue:

On behalf of the American Speech-Language-Hearing Association (ASHA), I submit these comments in opposition to a recent change by the Social Security Administration (SSA) in the interpretation of Missouri's definition of "teacher" with respect to section 218 of the Social Security Act. ASHA is the professional, credentialing and scientific organization that represents more than 130,000 audiologists, speech-language pathologists, and speech, language and hearing scientists.

We understand that under section 218, effective January 1951, states were allowed to enter into agreements with the SSA for social security coverage. Section 218 agreements in Missouri exempted teaching professionals, including speech-language pathologists (SLPs) and audiologists employed in the public schools from participating in social security, but included these teaching professionals in the state's Public School Retirement System (PSRS). The interpretation of "teacher" enacted prior to 1984 for the purpose of eligibility for PSRS included all teaching professionals holding Department of Elementary and Secondary Education (DESE) certification. It has remained in effect for over 40 years, despite a statutory change in the definition of "teacher" in 1984.

The proposed change in interpretation of section 218 making certain employees, including SLPs and audiologists, subject to social security will have significant consequences for the over 1300 members of ASHA employed in Missouri's public schools and will have a detrimental effect on state's ability to recruit qualified SLPs and audiologists for school positions. In addition, a significant shortage of qualified SLPs currently exists in Missouri and this proposed change will only exacerbate the problem.

We urge you to reconsider this change in position and allow all SLPs and audiologists who are members of PSRS to remain exempt from social security coverage. Thank you for the opportunity to submit comments. Should you have any questions or need further information, please contact Janet Deppe at jdeppe@asha.org or by phone at 301-296-5668.

Sincerely,

Catherine H. Gottfred, Ph.D.
President

cc: Governor Matt Blunt
Thomas J. Sadowski, Director
Missouri Social Security Administrator
Karen Kerns, President, Missouri Speech-Language-Hearing Association

Senator Christopher Bond
Senator Claire McCaskill

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