



February 24, 2020

Mark Allan Schultz
Acting Assistant Secretary
Office of Special Education and Rehabilitative Services
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Proposed Priority and Requirements—Technical Assistance on State Data Collection—National Technical Assistance Center To Improve State Capacity To Collect, Report, Analyze, and Use Accurate IDEA Part B and Part C Fiscal Data (Docket ID ED–2019–OSERS–0134)

Dear Acting Assistant Secretary Schultz:

On behalf of the American Speech-Language-Hearing Association, I write to comment on the U.S. Department of Education's December 10, 2019, *Federal Register* (FR) notice on Proposed Priority and Requirements—National Technical Assistance Center To Improve State Capacity To Collect, Report, Analyze, and Use Accurate IDEA Part B and Part C Fiscal Data.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, cognitive impairments, and swallowing disorders. More than half of ASHA members work in educational settings. The services provided by ASHA members help ensure that students receive a free appropriate public education (FAPE) in the least restrictive environment. They support students, families, and staff from early education through graduation in both general and special education.

The following comments and recommendations reflect ASHA's response to this FR notice:

Comments

The amount of information expected from states and local districts outlined in this notice is overwhelming.¹ Such burdensome information requests impact a state's ability to collect the volume of data required and the inclusion of quality metrics. In addition, states must correct any reporting errors to avoid losing federal funding, which adds to the burden of this data collection activity.

Recommendations

1. ASHA recommends that the federal government support states in conducting feasibility studies to evaluate strengths and weaknesses of their fiscal reporting structure, determine opportunities for enhancing efficiencies, and identify cost implications.
2. Components of the study should include identifying:

- state models that appropriately collect, report, analyze, and use accurate fiscal data related to the Individuals with Disabilities Education Act (IDEA) Part B and Part C.
- states that need technical and/or financial support in building and bolstering interoperable data systems to facilitate coordinated intrastate and interstate efforts to collect and report federal compliance IDEA data.

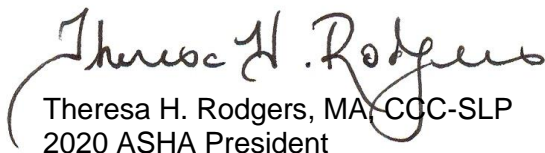
Rationale

As long as the federal portion of IDEA remains underfunded, state and local districts will be unduly challenged to meet the needs of children served by IDEA due to the variability in expenses associated with administering and coordinating early intervening services. Since IDEA Part C is permissive funding related to indirect and direct costs, it creates an additional burden on state and local districts to comply with the *payor of last resort* provision. The shortage of federal IDEA funding requires state and local districts to consistently do more to support students with less resources.

ASHA maintains that meaningful access to FAPE for all students, including those with disabilities, requires additional federal IDEA funding. ASHA will continue to advocate for Congress to increase funding for special education. Increased funding is essential to ensuring appropriate service delivery options and allowing students the ability to receive a full range of services from qualified professionals in order to access the general education curriculum in the least restrictive environment. The increasing complexities and needs of students served in special education make this a critical priority today.

Thank you for the opportunity to provide comments on the Proposed Priority and Requirements—Technical Assistance on State Data Collection—NTAC. If you or your staff have any questions, please contact Catherine D. Clarke, ASHA's director of education policy, at cclarke@asha.org.

Sincerely,



Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President

¹ American Speech-Language-Hearing Association. (n.d.). *Caseload and Workload*. Retrieved from <https://www.asha.org/practice-portal/professional-issues/Caseload-and-Workload/>.