



April 29, 2024

Ms. Jennifer Coffey
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: State Personnel Development Grants

Dear Ms. Coffey:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to provide feedback on the U.S. Department of Education's proposed priorities and requirements under the State Personnel Development Grants (SPDG) program.

ASHA is the national professional, scientific, and credentialing association for 234,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students.

ASHA supports this notice's focus on helping states improve their systems for personnel preparation and personnel development in order to improve results for children with disabilities. This focus is vital as we consider the acute issues related to compensation, caseloads and workloads, and personnel shortages for educational audiologists and SLPs.

According to the Bureau of Labor Statistics, the audiology profession is projected to grow 10% between 2021 and 2031.¹ The speech-language pathology profession is projected to grow 21% over the same period.² It's critical for state educational agencies (SEAs) to fully include educational audiologists and SLPs when making decisions on how state personnel development and career pathway systems are created. Specifically, the Department should make it clear that any proposed priorities both ensure educational audiologists and SLPs are at the table when crafting these programs and embed strategies to 1) facilitate increasing compensation, 2) ensure appropriate caseloads and workloads, and 3) mitigate the impact of personnel shortages.

Increasing Compensation

As part of the "Raise the Bar: Lead the World" initiative outlined in this proposed notice, educational audiologists and SLPs play a vital role to "mitigate the barriers to improved educational outcomes and functional results for children with disabilities by increasing the number of well-qualified, fully certified special education teachers, including paraprofessionals; increase collaborative and effective instruction and services for children with disabilities; expand the ability of principals to serve as instructional leaders who create an equity-based, cooperative, and inclusive environment; and provide pre-service and in-service personnel with the knowledge, attitudes, skills, and aspiration to engage effectively with families."

However, this work can only be done if educational audiologists and SLPs have appropriate compensation and working conditions that maximize the ability for related service providers to support the educational and functional needs of students in the provision of a Free Appropriate Public Education. Compared to the last reauthorization of the Individuals with Disabilities

Education Act (IDEA) in 2004, the currently allocated IDEA full funding amount as a percentage of the full funding amount in statute is less, not more.³ Consistent with the impact personnel shortages have on learning and recovery of COVID learning losses, we encourage the Department to provide guidance to SEAs and local education agencies on the use of funds through this grant program to ensure that highly qualified personnel are compensated commensurate with their level of education and professional certifications.

Appropriate Caseloads and Workloads

When caseloads and workloads become unmanageable, they hinder educational audiologists and SLPs' ability to provide effective, evidence-based services, collaborate with other school staff, and address all student goals. Schools risk inadequately responding to these conditions if they don't understand their educational audiologists' and SLP's many roles, offer limited administrative support, and fail to monitor caseloads and workloads effectively. This can exacerbate difficult working conditions by driving experienced educational audiologists and SLPs out of schools and making it challenging to recruit qualified providers. This can further degrade the quality of services students receive, leading to delayed and overall limited progress, interruption of services, increased due process complaints from parents, and other concerns.

ASHA believes any determination about the burden of caseloads and workloads and their effects on students' education should include workload analysis tools, such as the ASHA Workload Calculator, or a similar method.⁴ The Workload Calculator and similar tools identify specific workload characteristics, including the proportion of hours spent providing direct and indirect services, completing compliance requirements, and performing other activities. Workload analysis tools assist administrators in accurately modifying workload responsibilities, making full-time equivalent allocations, and reducing caseloads, if necessary. ASHA encourages the Department to use this grant as a leverage point to ensure states incentivize appropriate caseloads and workloads. Right-sizing this issue will increase the likelihood that students receive the most appropriate support for them to be able to meet their educational and functional goals.

Mitigating the Impact of Personnel Shortages

ASHA supports the consideration of new and dynamic workforce pathways to support the special education workforce system. It is imperative that the federal workforce personnel pipeline system explicitly includes educational audiologists and SLPs. This includes equal access to all workforce programs across an individual's professional career regardless of setting (e.g., clinical or school-based). ASHA supports the range of career pathways highlighted in this notice, ranging from registered apprenticeships to Grow Your Own (GYO) programs.

ASHA has seen great success when funding is used to support GYO programs, from Arizona and Maryland to South Carolina and Texas.⁵ Two common benefits for program participants include 1) getting paid as a school district employee while enrolled in a communication sciences and disorders program and 2) receiving tuition support. Participating in these types of programs also typically leads to securing employment opportunities immediately after completing the program. These personnel career pathway strategies provide an additional tool for states to consider as they seek to keep and retain high-quality personnel, especially in areas where personnel shortages are most severe.

Updating the priorities and requirements of the SPDG is an opportunity for the federal government to incentivize SEAs to develop programs that more intentionally include educational audiologists and SLPs. This includes ensuring our personnel development and career pathway system addresses acute issues such as increasing compensation, ensuring appropriate caseloads and workloads, and mitigating the impact of personnel shortages through innovative workforce models.

Thank you for the opportunity to provide feedback. If you or your staff have any questions, please contact Bill Knudsen, ASHA's director of education policy, at bknudsen@asha.org.

Sincerely,



Tena L. McNamara, AuD, CCC-A/SLP
2024 ASHA President

¹ American Speech-Language Hearing Association (ASHA). *Supply and Demand Resource List for Audiologists*. <https://www.asha.org/siteassets/surveys/supply-demand-audiology.pdf>.

² American Speech-Language Hearing Association (ASHA). *Supply and Demand Resource List for Speech-Language Pathologists*. <https://www.asha.org/siteassets/surveys/supply-demand-slp.pdf>.

³ National Council on Disability. (2018 Feb. 7). *Broken Promises: The Underfunding of IDEA*. <https://www.asha.org/SLP/schools/Workload-Calculator/>.

⁴ American Speech-Language Hearing Association (ASHA). ASHA Workload Calculator. <https://www.asha.org/SLP/schools/Workload-Calculator/>.

⁵ American Speech-Language Hearing Associations (ASHA). *Grow Your Own School-Based SLP or SLPA Programs*. Retrieved from <https://www.asha.org/slp/schools/grow-your-own-school-based-slp-or-slpa-programs/>.