



May 21, 2019

Dr. Mark Schneider  
Director, Institute of Education Sciences  
U.S. Department of Education  
400 Maryland Ave SW, Room 4109  
Potomac Center Plaza  
Washington, DC 20202

Dear Director Schneider:

On behalf of the American Speech-Language-Hearing Association, I submit these comments to the Institute of Education Sciences (IES), U.S. Department of Education (ED), in response to the March 28, 2019, *Federal Register* notice on IES' proposed priorities to guide its work.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists and speech-language pathologists (SLPs) who work in educational settings provide important and valuable services that help students access the general curriculum, and collaboratively develop learning systems for students. ASHA members support students, families, and staff from early education through graduation in both general and special education.

Speech-language pathology services are highly utilized by students served under the Individuals with Disabilities Education Act (IDEA). According to ED's 40th Annual Report to Congress on the Implementation of IDEA, 2018, speech or language impairments represent **the most prevalent disability category** (42.6%) of children ages 3 through 5 served under IDEA Part B. Additionally, speech or language impairment was **the second or third most prevalent disability category** for students ages 6 through 21 in every racial/ethnic group served under IDEA Part B.<sup>1</sup>

As language understanding and production represent integral aspects of learning, there needs to be a greater research emphasis on improved outcomes for students with communication impairments.

One concern that deserves consideration researching is the impact of excess workloads for SLPs and other school personnel on student outcomes. ASHA recommends taking a workload analysis approach to setting caseloads to ensure that students receive the services they need to support their educational programs.<sup>2</sup> Workload is a salient issue across educational settings. A high workload for school-based practitioners, including the burden of make-up sessions to ensure compliance with a student's individualized family service plan or individualized education plan, can negatively affect student outcomes.<sup>3</sup> Workload refers to all activities required and performed by school-based practitioners, such as audiologists and SLPs. It includes the time spent providing face-to-face direct services to students, as well as the time spent on behalf of the child conducting other activities necessary to support students' education programs, implement best practices for school speech-language services, and ensure compliance with IDEA, 2004, as well as other mandates. Traditionally, a school-based SLP's workload has been conceptualized as almost exclusively synonymous with caseload; the reality is that caseload represents only a component of an SLP's workload.

ASHA submits the following comments and recommendations:

### ***Goals Section***

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#### **Recommendation:**

Replace "teachers" with "educators," so that it reads:

- To gather educational statistics that provide information on schools, ~~teachers~~ **educators**, and learners across the Nation and serve as a foundation for education science research.

#### **Rationale:**

The term "educators" is more inclusive, representing not only teachers, but other education professionals such as principals and specialized instructional support personnel.

### ***Goals Section***

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#### **Recommendation:**

Add the following goal:

- To evaluate the impact of systemic longstanding issues in schools (e.g., limited school funding, personnel shortages, excessive paperwork, and unmanageable workloads) on instructional quality and students' social, academic, and vocational outcomes, and to develop practical solutions to these issues.

#### **Rationale:**

Achievement of the other goals in this section depend upon and are impacted by constraints of the educational program and the delivery of instruction. Education can be impeded when school personnel must grapple with issues such as excessive paperwork and unwieldy student to educator ratios. Special education teachers and specialized instructional support personnel, such as educational audiologists, speech-language pathologists, and occupational therapists regularly face unmanageable caseloads and excessive paperwork, in part due to personnel shortages. It is critical that ED comprehensively evaluate the impact of excessive workload on the functioning of schools and associated student outcomes.

### ***Increasing Dissemination and Use Section (7th bullet)***

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#### **Recommendation:**

Replace "teachers" with "educators," so that it reads:

- Encourage partnerships between researchers and private companies, both non-profit and for-profit, to put interventions that work into more schools and in the hands of more ~~teachers~~ educators, parents and families, and learners.

#### **Rationale:**

The term "educators" is more inclusive, representing not only teachers, but other education professionals such as principals and specialized instructional support personnel.

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### ***Increasing Dissemination and Use Section***

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#### **Recommendation:**

Add the following bullet:

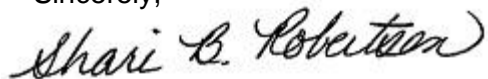
- Encourage partnerships between researchers and community-based programs to identify key considerations for preparing students to be productive and engaged citizens.

#### ***Rationale:***

Social interaction skills continue to be important for transition to life beyond secondary school. Workforce demands have shifted toward the age of automation, which requires some level of technological savvy and the ability to collaborate. It is important to keep a pulse on community needs and endeavors relative to the educational programming of students, which could facilitate the transition from secondary school, including identifying gaps in educational programming that may be hindering a smooth, successful transition.

Thank you for the opportunity to provide comments on the March 28, 2019, *Federal Register* notice on IES' proposed priorities. If you or your staff have any questions, please contact Catherine D. Clarke, ASHA's director of education policy, [cclarke@asha.org](mailto:cclarke@asha.org).

Sincerely,



Shari B. Robertson, PhD, CCC-SLP  
2019 ASHA President

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<sup>1</sup> U.S. Department of Education, Office of Special Education and Rehabilitative Services, Office of Special Education Programs, *40th Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act, 2018*, Washington, D.C. 2018. Retrieved from <https://www2.ed.gov/about/reports/annual/osep/2018/parts-b-c/40th-arc-for-idea.pdf>.

<sup>2</sup> American Speech-Language-Hearing Association. (2002). *A workload analysis approach for establishing speech-language caseload standards in the school* [Position statement]. Retrieved from <https://www.asha.org/policy/>.

<sup>3</sup> Schooling, T.L. (2003). Lessons from the National Outcomes Measurement System (NOMS). *Seminars in Speech and Language, 24*(3), 245-256.