



March 1, 2024

The Honorable Virginia Foxx  
Chairwoman  
Committee on Education & the Workforce  
U.S. House of Representatives  
2176 Rayburn House Office Building  
Washington, DC 20515

The Honorable Bobby Scott  
Ranking Member  
Committee on Education & the Workforce  
U.S. House of Representatives  
2101 Rayburn House Office Building  
Washington, DC 20515

Dear Chairwoman Foxx and Ranking Member Scott:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to share our views on the College Cost Reduction Act (H.R. 6951) and its impact on the ability of students studying communication sciences and disorders to become audiologists and speech-language pathologists. We are pleased to see improvements to access to higher education for students but are concerned with certain changes that 1) limit student access to financial resources and 2) may burden programmatic accrediting agencies in a way that may lead to additional costs that could be passed on to students.

ASHA is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids and implantable hearing devices. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders.

### **Provisions ASHA Supports**

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ASHA appreciates efforts in H.R. 6951 to improve access to higher education and ensure that students are able to afford undergraduate and graduate education. We specifically note provisions to improve access and affordability, including:

- Simplification of Student Loan Repayment Options – While we support efforts to streamline the number of student loan repayment options, we urge you to ensure that these new options will maintain access to the Public Service Loan Forgiveness (PSLF) program and opportunities to ensure successful repayment, such as refinancing options.
- Elimination of Origination Fees and Interest Capitalization – The inclusion of these bipartisan provisions would greatly improve the ability of federal student loan borrowers to repay their loans in a timely and predictable manner.

### **Provisions ASHA Opposes**

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ASHA is particularly concerned with several provisions that would limit students' access to federal loans and apply standards to accrediting agencies that are likely to increase the cost of education. Specifically, we are concerned with provisions that would:

- Eliminate Graduate PLUS loans – Both audiologists and SLPs must earn graduate degrees in order to obtain a license to practice in every state in the country. The elimination of Graduate PLUS loans would likely drive borrowers back into the private student loan market, where students will lose access to critical federal protections and

federal repayment and forgiveness programs, such as PSLF. The PSLF program is an important recruitment tool for many employers of audiologists and SLPs – which include school systems, other educational settings, and nonprofit hospitals and clinical settings.

- Median Cost of College and Caps on Federal Loan Limits – These provisions of H.R. 6951 would have a negative impact on students' ability to access federal student aid and loans. In particular, disadvantaged students would likely need to resort to private student loans, thus limiting their access to federal loan repayment and forgiveness programs.
- Accreditors – ASHA is greatly concerned with the wide-ranging changes to the existing accreditation system that are included in Title III of H.R. 6951. As reported, the bill would apply the same requirements for all accrediting agencies, including programmatic accreditors, many of which are not Title IV gatekeepers. Certain changes would increase the administrative burden on programmatic accreditors, resulting in increased accreditation costs that would be passed on to students. ASHA supports maintaining current eligibility requirements for programmatic accreditors while allowing the U.S. Department of Education to monitor and sanction those accreditors that fail to comply with recognition criteria.

Thank you for the opportunity to express ASHA's views on H.R. 6951. ASHA looks forward to working with you to improve this bill as it moves through the House to support improved access and affordability for students, while ensuring accountability and accreditation measures do not place new requirements on accreditation agencies that could increase the cost of higher education. If you or your staff have any questions, please contact Eric Masten, ASHA's director of federal affairs, education, at [emasten@asha.org](mailto:emasten@asha.org).

Sincerely,

A handwritten signature in cursive script, appearing to read "Tena L. McNamara".

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