



February 21, 2024

Dr. Michelle Daley
Office of Elementary and Secondary Education
United States Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Proposed Priorities, Requirements, Definitions, and Selection Criteria-Comprehensive Centers Program

Dear Dr. Daley:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to provide feedback on the U.S. Department of Education's notice on Proposed Priorities, Requirements, Definitions, and Selection Criteria Comprehensive Centers Program.

ASHA is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Audiologists are the education team members with comprehensive knowledge about hearing loss and the impact unaddressed hearing loss has on speech and language development, communication, and learning. SLPs work to prevent, assess, diagnose, and treat speech, language, social communication, cognitive-communication, and swallowing disorders across the lifespan. Our vision is to make effective communication, a human right, accessible and achievable for all.

ASHA supports the process to "award grants to establish Comprehensive Centers that provide high-quality capacity-building services to State, regional, and local educational agencies and schools that improve educational opportunities and outcomes, close achievement gaps, and improve the quality of instruction for all students." As highlighted in the notice, Comprehensive Centers are an important piece of the U.S. Department of Education's overall technical assistance ecosystem. We generally support the Department's three proposed priorities of a National Comprehensive Center, Regional Centers, and Content Centers.

Specifically, ASHA supports the development of Content Centers "to build the capacity of practitioners, education system leaders, public schools serving preschool through 12th grades (P-12) (which may include Head Start and community-based preschool), LEAs, and SEAs to use evidence in the designated content area." The four content areas of English learners and multilingualism, early school success, fiscal equity, and strengthening and supporting the educator workforce are important foci of work.

As the Department examines these areas, we encourage explicit consideration of how the field of communication sciences and disorders—specifically audiology and speech-language pathology—is a vital component of support to reach the Department's goals through the Comprehensive Center network. Audiologists and SLPs ensure the development of early childhood through adult literacy, academic, and social-emotional skills.

As the Department considers updating their priorities, requirements, and selection criteria for fiscal year 2024 and beyond, we offer a few points of consideration to support the overall goal to “Raise the Bar: Lead the World.”¹

English Learners and Multilingualism

The renewed Comprehensive Centers priorities could play a vital role in addressing the needs of school districts to improve support for English learners and multilingualism. Currently, school districts may not receive adequate funding or support to hire, train, and retain audiologists and SLPs who provide culturally responsive and linguistically appropriate speech, language, and hearing services for English learners and multilingual students, in their primary language(s), as outlined in the Individuals with Disabilities Education Act (IDEA). There is also a lack of access to interpreters for appropriate service delivery, including funding and lack of support for ongoing access in intervention, even if transitional.

Audiologists and SLPs in schools hold integral roles in education—ranging from evaluations and meetings to providing support during clinical and school-based interventions—and are essential members of school faculties. Effective speech-language and/or hearing assessment and intervention may require collaboration with an interpreter and translator to ensure linguistically appropriate services.²

The appropriate roles and responsibilities of audiologists and SLPs when collaborating with an interpreter, transliterator, or translator include the following.

- Identifying clinical exchanges for which collaborating with an interpreter, transliterator, or translator is necessary.
- Identifying the appropriate language(s) of service for students/families including identifying the preferred language for meetings, services, and written documentation.
- Advocating for access to an interpreter, transliterator, or translator.
- Making advance arrangements to ensure appropriate physical accommodations (e.g., space, lighting, noise) necessary for successful collaboration, including placement of phone, computer, and/or video screen to ensure visibility and audibility during remote sessions.
- Creating a foundation for successful collaboration, including:
 - scheduling additional time in sessions to accomplish goals;
 - verifying the cultural appropriateness of assessment and treatment materials and reviewing potential bias;
 - reviewing prompts in assessment materials for linguistic influences of additional languages and consulting with experts and resources to review phonetic information and potential syntactic influences;
 - arranging for documents written in unfamiliar languages to be translated, to ensure that they, as clinicians, are aware of the content of the documents; and
 - understanding that the translation of written material from English to a non-English language may alter the intent and overall readability of the document.
- Understanding that not all spoken and manually coded languages, including American Sign Language (ASL), have a written form.
- Seeking an interpreter, transliterator, or translator who has knowledge and skills that include:

- having native or near-native proficiency in the appropriate language(s), dialect(s), and communication system(s)—and the ability to provide accurate interpretations, translations, and transliterations;
 - understanding the student’s/family’s particular culture and speech community or communicative environment;
 - understanding the basic principles of assessment and/or intervention and having the ability to provide context to the client/family to understand clinical objectives and professional terminology;
 - understanding professional ethics, client–patient confidentiality, and the need to limit bias; and
 - understanding that different sign languages are used in different countries and regions and that dialectal differences exist.³
- Establishing collaborative relationships with interpreters, transliterators, and translators to maximize the effectiveness of services.
 - Maintaining appropriate professional relationships among the clinician, the student/family, and the interpreter, transliterator, or translator.
 - Seeking information on the features and developmental characteristics, when available, of the language(s) and/or dialect(s) that are spoken or signed by the student/family.
 - Obtaining information on the student’s/family’s significant cultural and linguistic influences, when possible.
 - Understanding the standardization process for assessments and how collaboration with an interpreter, transliterator, or translator may influence or possibly invalidate standard scores.
 - Educating the interpreter, transliterator, or translator regarding the goals and intent of the session.⁴

ASHA recommends the Department consider the above-mentioned roles set forth for audiologists and SLPs to ensure access to interpreting services and engagement. At the end of this letter is a list of ASHA resources to provide context to the role of audiologists and SLPs. Audiologists and SLPs play a key role in ensuring student success social-emotionally, functionally, and academically. Collaboration with interpreters and translators is critical for linguistically appropriate and culturally responsive services to multilingual populations.

Early School Success

Audiologist and SLPs are integral to early school success, as comprehension and production of language represent essential aspects of learning. ASHA believes there must be a greater research emphasis on improved outcomes for students with communication impairments. As part of the Department’s priorities, we hope Comprehensive Centers will examine issues that directly impact the ability of audiologists and SLPs to serve students and their families. ASHA recommends that Comprehensive Center technical assistance be more robustly focused on caseload management for practitioners, such as audiologists and SLPs; rural capacity building for accessing school-based services for students who already qualify under Medicaid; and school-based telepractice.

Strengthening and Supporting the Educator Workforce

Strengthening and supporting the educator workforce is a priority that ASHA shares with the Department. More than half of our members work in educational settings and/or provide early

intervention services, which help ensure children develop effective cognitive-communication skills and achieve successful learning outcomes. To strengthen the personnel pipeline, we encourage the Department to support building “Grow Your Own Programs” and registered apprenticeship programs that include audiologists and SLPs. These types of programs would support the development of clinical skills in these school-based professionals and create a recruitment pipeline.

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, CCC-A/SLP
2024 ASHA President

ASHA Resources

- Speech-Language Pathologist's Experiences with Interpreters in the School Setting: A Preliminary Study (https://pubs.asha.org/doi/epdf/10.1044/2021_PERSP-20-00166)
- Working With Interpreters to Support Students Who Are English Language Learners (<https://pubs.asha.org/doi/10.1044/persp1.SIG16.15>)
- Integrating and Interpreter (<https://leader.pubs.asha.org/doi/10.1044/leader.SIGN.17092012.40>)
- Ethics, Equity, and English-Language Learners: A Decision-Making Framework (<https://leader.pubs.asha.org/doi/10.1044/leader.FTR1.15092010.10>)
- The Ethics of Assessment With Culturally and Linguistically Diverse Populations (<https://leader.pubs.asha.org/doi/10.1044/leader.FTR5.09052004.6>)
- Ways to Incorporate Interpreters as Interprofessional Partners (<https://leader.pubs.asha.org/doi/10.1044/leader.SCM.27072022.IPP-interpreters.30/full/>)

¹ U.S. Department of Education. (n.d.). *Raise the Bar: Lead the World* | U.S. Department of Education. <https://www.ed.gov/raisethebar>.

² American Speech-Language-Hearing Association. (n.d.). *Bilingual Service Delivery* (Practice Portal). <https://www.asha.org/practice-portal/professional-issues/bilingual-service-delivery>.

³ National Institute on Deafness and Other Communication Disorders. (n.d.). *American Sign Language*. <https://www.nidcd.nih.gov/health/american-sign-language>.

⁴ American Speech-Language-Hearing Association. (n.d.). *Collaborating with Interpreters, Transliterators, and Translators*. (Practice Portal). <https://www.asha.org/practice-portal/professional-issues/collaborating-with-interpreters/>.