



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

May 19, 2003

Jacquelyn C. Jackson, Ed.D.  
Acting Director, Student Achievement and  
School Accountability Programs  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Room 3W230, FB-6  
Washington, DC 20202-6132

Dear Dr. Jackson:

The American Speech-Language-Hearing Association (ASHA) is pleased to submit the following comments on the proposed regulations under Title 1 of the Elementary and Secondary Education Act for the academic achievement of students with the most significant cognitive disabilities. This is in response to your request for comments that appeared in the March 20, 2003 *Federal Register*. ASHA is the national professional, scientific, and credentialing association representing over 109,000 speech-language pathologists, audiologists, and speech, language and hearing scientists. Approximately half of our members work in school settings, and as such education ranks high among the priorities of the Association.

We are pleased to submit the following comments on the proposed regulations:

### **Section 200.6 Inclusion of All Students**

**Comments:** ASHA supports the establishment of alternate academic achievement standards aligned with the state's academic content standards, and related alternate assessments. The use of grade-level standards for students with the most significant cognitive disabilities is certainly inappropriate. It is important to ensure that the alternate academic achievement standards focus on functional goals for this population, and that they are adequately challenging for these individuals to develop their full potential while being reasonable to attain.

### **Executive Order 12866 Costs and Benefits**

**Comments:** ASHA supports the goal of facilitating a better understanding of accountability requirements regarding students with the most significant cognitive disabilities. It is essential that the appropriations from Title I and other federal programs that will finance these activities be sufficient to support the personnel needed to develop

Letter to Jacquelyn C. Jackson, Ed.D.

Page 2

May 19, 2003

appropriate alternate academic achievement standards and alternate assessments. This must be research-based and expert driven, if it is to be successful. It is also essential that adequate resources be available to evaluate and monitor the appropriateness of states' alternate academic achievement standards and alternate assessments.

### **200.2(c)(3) Multiple assessments**

**Comments:** ASHA is not in agreement with current regulations that require that a student's performance on the first administration of high-stakes assessments be used to determine Adequate Yearly Progress (AYP). Students with disabilities often have difficulty with the format of tests over and above the content of the tests. Many times they need multiple exposures to a test in order to develop familiarity with the format in order to adequately demonstrate mastery of the content. Difficulty with format can mask mastery of content, and indeed can appear to be failure to master content. ASHA acknowledges sound reasons for permitting a student to take high-stakes assessments multiple times, and supports allowing scores from later administrations to be used as a reflection of both student and school performance.

Thank you for the opportunity to provide these comments to OESE on the proposed regulations under Title 1 of ESEA for the academic achievement of students with the most significant cognitive disabilities. If you need additional information, please contact Catherine Clarke, ASHA's Director of Education and Regulatory Advocacy, at 301-897-0159 or via e-mail at [cclarke@asha.org](mailto:cclarke@asha.org). We look forward to working with OESE as you finalize these proposed regulations.

Sincerely,

Glenda J. Ochsner, Ph.D., CCC-SLP  
President