

AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

September 5, 2002

Francisco Garcia
Director, Migrant Education Program
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Ave., SW
Room 3E317, FB-6
Washington, DC 20202-6132

Dear Mr. Garcia:

The American Speech-Language-Hearing Association (ASHA) is pleased to submit these comments on Subpart C-Migrant Education Program of Title 1 of the Elementary and Secondary Education (ESEA) Act of 1965, as amended. This is in response to your request for comments on the proposed regulations on Title 1 programs that appeared in the August 6, 2002 *Federal Register*.

As you know, poor communication skills can interfere with children's ability to understand and participate in classroom instruction and may impair their relationships with teachers and other children. ASHA is the national professional, scientific, and credentialing association representing more than 107,000 speech-language pathologists, audiologists, and speech/language/hearing scientists nationwide. More than 47,000 ASHA certified school-based speech-language pathologists (SLPs) and audiologists work every day in public and private schools with children who have communication problems that affect their success in classroom activities, social interaction, literacy, and learning.

ASHA's comments on Subpart C Migrant Education Program are as follows:

Section 200.83 Responsibilities of SEAs to implement projects through a comprehensive needs assessment and a comprehensive State plan for service delivery.

Recommendation: Amend Sec. 200.83(b) by inserting the following bolded and underlined language:

The SEA must develop its comprehensive State plan in consultation with the State parent advisory council or, for SEAs not operating programs for one school year in duration, in consultation with the parents of migratory children. **The inclusion of parents requires that interpreter services may need to be made available to parents, that all notices must be provided in a language that parents can**

understand; taking into account language proficiency and literacy levels for the target population and using non-traditional communication vehicles, such as posting notices and information at churches and other social service facilities, and educating and establishing networks with other caregivers (e.g., those providing social services and health care to this population) for requesting input and feedback from parents.

Rationale: Many migrant children are from families with limited English proficiency and limited education and literacy levels. Communicating information to and obtaining input from parents will require consideration of parents' literacy levels, different languages and dialects, and that alternative means for communicating to parents may need to be identified, since parents of migrant children are often not accessible through traditional means, e.g., mailing materials, and electronic communication. Providing examples of other ways of reaching the parents of migratory children, such as posting information at other facilities that provide services to this population (e.g., churches, social service facilities, etc), and educating and establishing networks with other caregivers (e.g., those providing social services and health care to this population), will help to ensure more effective communication with these families.

Section 200.84 Responsibilities of SEAs for Evaluating the Effectiveness of the MEP

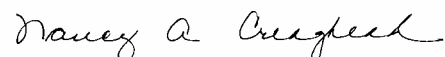
Recommendation: Amend Sec. 200.84 by inserting the following bolded and underlined language:

..., particularly for those students who have priority for services as defined in section 1304(d) of the Act. **That program should include the use of alternatives to standardized testing used with other children.**

Rationale: Since migratory children must be a part of the overall evaluation of the success of the program, there is a need to identify alternative procedures and techniques for measuring student success. These children often cannot be assessed through standard or traditional means since standardized testing used with other children to determine overall program progress is not likely to be valid with these populations.

Please contact Catherine Clarke, ASHA's Director of Education and Regulatory Advocacy, at 202-624-5953 or by e-mail at cclarke@asha.org if you have any questions. Thank you for your consideration of these comments/recommendations as you implement changes to Title 1 of the ESEA made by the No Child Left Behind (NCLB) Act. We look forward to working with ED to assure that no child is left behind.

Sincerely,



Nancy A Creaghead, PhD
President