February 10, 2020

Vicki J. Traufler, PhD
PADEPP Coordinator
Office of Educator Effectiveness and Leadership Development
SC Department of Education
8301 Parklane Road
Columbia, SC 29223

RE: ADEPT Support and Evaluation System Guidelines

Dear Dr. Traufler:

On behalf of the American Speech-Language-Hearing Association, I write in support of the South Carolina Department of Education’s (SCDE) draft ADEPT Support and Evaluation System Guidelines for Speech-Language Professionals (ADEPT SLP). We commend SCDE for its thorough and thoughtful review of the necessary components to develop an evaluation for speech-language pathologists.

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. Over 2,700 ASHA members reside in South Carolina.

ASHA maintains that teacher accountability measures that are often used to evaluate teachers and other professionals, including speech-language pathologists (SLPs), do not accurately reflect the contributions SLPs make in the school community. ASHA maintains that SLPs, as well as all other school professionals, should be held accountable for their services. ADEPT SLP, which SCDE acknowledges is based in part on ASHA’s Performance Assessment of Contributions and Effectiveness (PACE) framework, is an effective accountability measure of the instructional contributions provided by school based SLPs.

**ASHA’s Comments on Specific Components of ADEPT SLP**

**Evaluation Process:** ASHA supports the ADEPT SLP evaluation process for its inclusion of pre- and post-observation conferences, records, reviews, and observation timeline, which requires at least one observation of an Individualized Education Program (IEP) meeting and therapy session per cycle. SCDE’s inclusion of an SLP self-reflection tool is critical to ensuring SLPs can meaningfully contribute to their evaluation and development.

**Composite Score Range and SLP Rating:** The ADEPT SLP Composite Score Range is a balanced and transparent rating scale that strengthens the overall objectivity of the evaluation process.

**Evaluation Rubric:** ASHA’s PACE Matrix is the foundational tool of the PACE evaluation system, and we are pleased to see this model incorporated into ADEPT SLP. The evaluation
rubric is comprehensive and emphasizes both the role of the evaluator and the SLP in assessing performance.

**ASHA’s Recommendations for Strengthening ADEPT SLP**

ADEPT SLP can be improved by connecting the evaluation process to the creation of a formal professional development plan for each SLP. Professional development plans are essential to the evaluation process because they enable each SLP to make decisions with their evaluators about how to improve and strengthen their skills through establishing a limited number of annual development goals. ASHA designed PACE with a comprehensive professional development plan in mind. We believe such a plan could be easily incorporated into ADEPT SLP by expanding upon its existing requirement for an annual goals-based evaluation. ASHA is willing and able to assist SCDE in incorporating this recommendation into ADEPT SLP.

ASHA applauds your efforts to develop and implement the ADEPT SLP and welcomes the opportunity to work with you on this initiative. If you or your colleagues have any questions, please contact Tim Boyd, ASHA’s director of state health care and education affairs, at tboyd@asha.org.

Sincerely,

Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President