January 11, 2007

John H. Hager  
Assistant Secretary  
Office of Special Education & Rehabilitative Services  
U.S. Department of Education  
400 Maryland Avenue, SW  
Potomac Center Plaza, Room 4102  
Washington, DC 20202-2641

Dear Assistant Secretary Hager:

The American Speech-Language-Hearing Association (ASHA) appreciates the opportunity to submit the following comments on the U.S. Department of Education’s (ED’s) proposed Comprehensive Plan for IDEA Part D National Activities. This is in response to ED’s request for comments that appeared in the November 27, 2006 Federal Register.

ASHA is the national professional, scientific, and credentialing association representing over 123,000 speech-language pathologists, audiologists, and speech, language and hearing scientists. ASHA members who work in a school-based setting provide primary services to over 1.5 million students or roughly 25% of students served under IDEA Part B had speech, language, or hearing impairments as their primary disability. We estimate that speech-language pathologists provide services to more than half of all children served under the IDEA program when those with speech-language or hearing as secondary or tertiary disabilities are included.

In summary, our comments on the Comprehensive Plan recommend that the language clearly states that “related service providers” are eligible for personnel preparation grants. ASHA is very concerned about the declining trend in the number of grants awarded to speech-language pathologists (SLPs) and audiologists under the IDEA personnel grants program. Overall, the number of personnel preparation competitions open to speech-language pathology/audiology programs has been markedly restricted. In the last two years, we have been limited to applying for grants that are available to “related service personnel,” and not other categories under which we were previously eligible. This has resulted in a deep decline in the number of personnel preparation grants awarded to SLPs and audiologists.

Should you need further information, please contact Catherine Clarke, Director of Education and Regulatory Advocacy, at 202-624-5953 or by e-mail cclarke@asha.org.

Sincerely,

Noma B. Anderson, PhD., CCC-SLP  
President
ASHA Comments on ED’s Proposed Comprehensive Plan for IDEA Part D National Activities

Program Outcomes

Outcome 1:
Comments:
Emphasis should be placed on seeking pre-service and in-service project models that would engage general education teachers, special education teachers, and speech-language pathologists (and other related service providers) in collaborative projects that will help all children develop language and literacy skills.

Outcome 2:
Comments:
Three subsections in this outcome refer only to regular and special educators and early interventionists. There is no mention of the role of related service providers in RTI, collecting, analyzing, and reporting progress data, or being skilled in appropriately identifying children with disabilities from diverse backgrounds.

ASHA supports ED’s statement in this outcome that “the system must provide flexibility to enter and exit special education and collaborating agency services across disability and age spectrums.” This would make a big difference, especially if it were done with minimal paperwork. While preserving students’ civil rights and promoting academic achievement must remain paramount, ASHA’s school-based professionals have identified excessive paperwork as their greatest challenge, followed by lack of time for preparation and planning with teachers. With SLP caseload averaging approximately 50 students and some local district caseloads higher than 100, considerable paperwork detracts from the time available to provide students with necessary services.

RECOMMENDATIONS:
Add the bolded and delete the struck-through language in the following sections in Outcome 2:

- The delivery of technical assistance and dissemination of information is needed to assist regular educators, special educators, related service providers, and early childhood personnel in differentiating the collection of and the analysis of data to inform instruction and improve early identification.

- Implement personnel preparation programs for regular education, special education, related service providers, and early childhood personnel with an emphasis on early intervention.

- Both regular and special educators, and related service providers need to become better skilled at using culturally free identification practices and interventions for students who are at risk for school failure and, potentially, for being identified as needing special education and related services.
**Rationale:**

There is a need for more explicit reference to related services, specifically the role of speech-language pathologists in assessment and intervention, speech-language pathologists need to be clearly eligible for personnel preparation projects. ASHA is concerned that speech-language pathologist will be further marginalized in their roles with infants, toddlers, and children with disabilities if their role is not clearly delineated, along with outcomes for children in need of hearing and speech-language services.

SLPs are key members of the individualized education program (IEP) and as such their eligibility for these programs should be clearly stated in the text. ASHA members who work in a school-based setting provide primary services to over 1.5 million students with speech-language and hearing disabilities (25th Annual Report to Congress). This indicates that about 25% of students served under IDEA had speech or language impairments as their primary disability. We estimate that speech-language pathologists provide services to more than half of all children served under the IDEA Part B program when those with speech-language or hearing as secondary or tertiary disabilities are included. Therefore, it is important that related services providers be specifically listed in the Comprehensive Plan’s outcomes for eligibility purposes.

However, ASHA is very concerned with the declining trend in the number of grants awarded to speech-language pathologists (SLPs) and audiologists under the IDEA personnel grants program. Overall, the number of personnel preparation competitions open to speech-language pathology/audiology programs has been markedly restricted. In the past, programs in communication disorders/audiology could apply under several competitions. Over the last two years, SLPs and audiologists have been limited to applying under a “related service personnel” category that included OTs, PTs, and school psychologists.

**Outcome 3:**

**RECOMMENDATIONS:**

Add the bolded language in the following sections in Outcome 3:

- This outcome focuses on the development of literacy, **communication** and numeracy skills by children with disabilities across all age groups.

- Literacy, **communication** and numeracy are important basic skills that affect the ability of students to succeed in all content areas and all environments.

**Rationale:**

This change would make the text consistent with the heading of Outcome 3: “**Children with Disabilities Will Demonstrate Improved Literacy, Including Early Language, Communication and Numeracy Skills.**” Communication is a critical component of school success, and many children with disabilities have communicative (speech and language) impairments that interfere with their ability to profit from classroom instruction and small group learning experiences. If the right to apply for grants under this category is implied in the heading but is not clearly stated in the text, we may well lose the right of inclusion.
Outcome 6:

Comments:

Although “related services” are mentioned in the topic heading of Outcome 6, the text only mentions the training of teachers. It is important that related services personnel including SLPs be specifically listed throughout this Plan so that they can be eligible for consideration for these training funds. For example, there is currently a personnel preparation RFP (CFDA # 84.323A State Personnel Development Grant) out that state education departments can apply for. The purpose is to provide personnel “with the knowledge and skills to meet the needs of, and improve the performance and achievement of infants, toddlers, preschoolers, and children with disabilities.” All references to training, however, are limited to special education and general education teachers. There is no reference to using funds to train SLPs or other related personnel. This is a major RFP – awarding between $500,000 to $4 million dollars/year to a state. Therefore, ASHA requests that the text clarify that SLP’s are eligible for this and similar grants.

RECOMMENDATION:

Add the bolded language in the following section in Outcome 6:

- Identify the characteristics of quality pre-service programs that prepare special and regular education, related services and early childhood providers to best serve students with disabilities

Rationale:

SLPs are key members of the individualized education program (IEP) and as such their eligibility for these programs should be clearly stated in the text. ASHA members who work in a school-based setting provide primary services to over 1.5 million students with speech-language and hearing disabilities (25th Annual Report to Congress). This indicates that about 25% of students served under IDEA had speech or language impairments as their primary disability. We estimate that speech-language pathologists provide services to more than half of all children served under the IDEA Part B program when those with speech-language or hearing as secondary or tertiary disabilities are included. Therefore, it is important that related services providers be specifically listed in the Comprehensive Plan’s outcomes for eligibility purposes.

There is a need for more explicit reference to related services, specifically the role of speech-language pathologists in assessment and intervention and the inclusion of speech-language pathologists in the list of professionals eligible for personnel preparation projects. If SLP eligibility is implied in the heading but is not clear in the text, we may well lose eligibility. ASHA is concerned that speech-language pathologist will be further marginalized in their roles with infants, toddlers, and children with disabilities if this is not clearly delineated. It will become increasingly more difficult to have sufficient numbers of well-trained SLPs to serve children with disabilities and their families if adequate training is not available.

A number of our members over the years have received grants from ED in the area of personnel preparation. However, ASHA is very concerned with the declining trend in the number of grants awarded to speech-language pathologists (SLPs) and audiologists under the IDEA personnel grants program. Overall, the number of personnel preparation competitions open to speech-language pathology/audiology programs has been markedly restricted. In the past, programs in communication disorders/audiology could apply under several competitions. Over the last two years, SLPs and audiologists have been limited to applying under a “related service personnel” category.