



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

March 31, 2003

The Honorable Mike Castle
1233 Longworth HOB
Washington, DC 20515

Dear Chairman Castle :

On behalf of over 109,000 members of the American Speech-Language-Hearing Association (ASHA), I am writing to express our serious concern about H.R.1350, the Improving Education Results for Children with Disabilities Act of 2003. Specifically, our members want to bring to your attention our strong opposition to the elimination of the highest qualified provider language in H.R.1350. Under a separate cover, we will follow up this correspondence with some additional recommendations for technical refinements.

As you may know, ASHA is the professional, scientific, and credentialing association for audiologists, speech-language pathologists, and speech, language, and hearing scientists. ASHA's mission is to ensure that all people with speech, language, and hearing disorders have access to quality services to help them communicate more effectively. ASHA's school-based members provide direct services to over one million non-disabled and disabled students each year and therefore education policy matters, such as H.R.1350, are among their highest concerns.

After careful analysis of the legislation, we would like to bring your attention to a dramatic weakness in H.R.1350. The legislation brings qualifications for special education teachers in line with their regular education counterparts under the No Child Left Behind Act (NCLBA), which represents an improvement of standards in general education. However, H.R.1350 takes a step backwards in requiring states to maintain standards for related services personnel. H.R.1350 removes part of the current statute describing how states must maintain the "highest requirements" for personnel standards for related services personnel (current law, Part B, Sec.612, (15)(B)(ii)). The personnel standards in H.R.1350 need to be clarified and strengthened or current law must be maintained. Without this change, H.R.1350 will fail to provide the accountability for states to ensure that students with disabilities receive a fair and appropriate public education.

10801 ROCKVILLE PIKE
ROCKVILLE, MARYLAND 20852-3279
301-897-5700 VOICE or TTY
FAX 301-897-7356

www.asha.org

444 NORTH CAPITOL ST., N.W.
SUITE 715
WASHINGTON, DC 20001
FAX 202-624-5955

There is a strong correlation between the qualifications of school-based personnel and the level of success of the students that receive those services. This is one of the key underlying principles of the NCLBA. ASHA certified and state-licensed speech-language pathologists are uniquely qualified to deliver services to children who have communication problems that affect their success in classroom activities, social interaction, literacy, and learning.

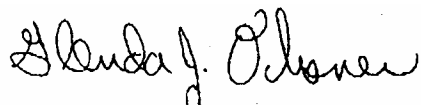
Children need good language skills to read and achieve in school. However, having unqualified or under-qualified personnel delivering related services to students with disabilities will only cause more problems, greater expense, lesser achievement outcomes and accountability. Instead of increased standards to promote accountability and student outcomes, the gap between school districts that have highly-qualified related services personnel and those who do not will significantly expand, particularly in rural and inner-city areas. Once again, the poorest children will receive the poorest education.

With unqualified or under-qualified related services personnel, schools will see increases in the over and misidentification of students for special education. These providers often have no or limited clinical experience and use out-of-date practices. Further, their lack of clinical practice experience and limited education often results in children being on special education rolls longer, costing local districts more money. Finally, the offering of special education services by school districts with unqualified or under-qualified personnel to parents with children with disabilities is misleading and disingenuous to the NCLB principles set forth by President Bush.

Again, H.R.1350 needs to be strengthened by retaining the highest qualified provider language for related services personnel and adding provisions that help school districts improve their recruitment and retention of qualified personnel.

For more information, please contact Neil Snyder, ASHA's Director of Federal Advocacy, at 800-274-2376, ext. 4257 or via e-mail at nsnyder@asha.org.

Sincerely,



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