



**ASHA**

American  
Speech-Language-Hearing  
Association

July 24, 2020

The Honorable Betsy DeVos  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary DeVos:

On behalf of the American Speech-Language-Hearing Association, I write to share ASHA's priorities for resuming the 2020-2021 school year as safely and effectively as possible.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, including swallowing disorders. More than half of ASHA members work in educational and/or early intervention settings. The services provided by ASHA members help ensure that all children, particularly children with disabilities, develop effective cognitive-communication skills and achieve successful learning outcomes while receiving a free appropriate public education (FAPE) in the least restrictive environment.

**Given the resurgence of the pandemic of Coronavirus Disease (COVID-19), and the anticipated confluence of the pandemic and the traditional flu season, ASHA strongly emphasizes the importance of granting state and local education agencies the flexibility to develop plans that prioritize safety while delivering the highest quality education possible during the upcoming school year.**

ASHA's Board of Directors, upon hearing from school-based audiologists and SLPs nationwide, has approved the following public policy priorities for your consideration:

- *prioritizing the safety of audiologists and speech-language pathologists, assistants, students and their families, and other school personnel;*
- *an evidence-based approach to resuming the 2020–2021 school year that prioritizes the safety of audiologists and speech-language pathologists, assistants, students, and their families, and other school personnel while delivering the highest quality education and related services possible;*
- *schools using data-driven guidance from the Centers for Disease Control and Prevention (CDC) and other public health entities to make determinations regarding schools reopening in the 2020–2021 school year. Determinations must take into account the health, safety, and well-being of school-based professionals and the students they serve;*

- *enhanced use of telepractice and distance learning that must continue throughout the pandemic to ensure the safety of audiologists, speech-language pathologists, students, and their families;*
- *appropriate and supplemental funding as necessary to ensure that state education agencies (SEAs) and local education agencies (LEAs) are able to undertake dynamic responses to COVID-19;*
- *supplemental funding to SEAs and LEAs must continue to ensure adequate access to supplies of personal protective equipment (PPE) and appropriate technology to facilitate distance learning;*
- *adequate supplies of appropriate PPE when on-site or engaged in face-to-face interactions; and appropriate technology to facilitate distance learning in response to COVID-19; adaptations should include use of clear face coverings to maximize communication and access to the curriculum; and*
- *flexibility in schools to prioritize safety, maximize learning opportunities, and meet unique community and individual circumstances.<sup>1</sup>*

In order to determine the best path forward, decisions about reopening schools must be based on scientific and evidence-based indicators of severity related to COVID-19 risk, including local infection rates, prevalence of community spread, and adequate availability of appropriate PPE. ASHA urges the Department to allow states the ability to factor local circumstances into the determination of how best to proceed with resuming the 2020-2021 school year.

States require the ability to determine the most appropriate plan for addressing the educational needs of their students as well as the safety of those students and the entire community. The decision to return to in-person instruction and services not only impacts students and school personnel, but also directly impacts families and the community as a whole. Data on local, state, and, in some cases, regional conditions regarding COVID-19 prevalence must inform SEA and LEA decision-making, as each locality is unique. There should not be a uniform approach to reopening schools.

SEAs and LEAs require adequate federal funding to appropriately respond to their current environmental circumstances. As schools across the nation move to a variety of educational models when the new school year begins, providing special education services will become even more complex. Increased funding is needed to allow districts the flexibility to respond to dynamic changing local conditions.

SEAs and LEAs require additional federal funding to effectively respond to the COVID-19 pandemic for both in-person and remote learning approaches. ASHA urges that federal support be provided equitably to states and districts regardless of the approach or approaches they take to resuming the 2020-2021 school year.

Additional funding is needed to allow LEAs pursuing distance learning to ensure adequate access to technology, including internet access, in order to address the technology gap low income, rural, and minority students face. While the technology gap has existed well before the pandemic, the ongoing need for distance learning requires that the federal government address the issue of access with greater urgency and immediacy. Barriers to accessing education services/materials must be reduced so that all children have equitable access to the general curriculum.

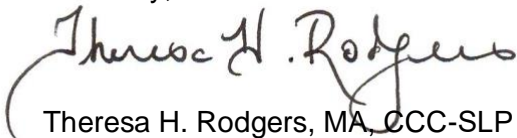
The expansion of telehealth for audiology and speech-language pathology services in schools is needed for continued access to these services, especially during the COVID-19 pandemic. There is a growing body of research on the use of telehealth for communication disorders including many studies demonstrating the comparability of telehealth and in-person services.<sup>2</sup>

For schools resuming with a hybrid approach, or those that intend to return primarily in person, technology access remains an ongoing need as well as resources required to help enhance safety. The availability of PPE, cleaning supplies, and additional costs associated with creating a space required for social distancing to help prevent COVID-19 from spreading in the building must not be overlooked. ASHA notes that even with school districts that intend to resume in-person classes, high-risk students will continue to require distance learning to ensure their safety and they will need enhanced technology resources.

Finally, ASHA continues to stress that while absolutely necessary to help contain and mitigate COVID-19, face masks usage can pose significant everyday challenges for people with communication disorders—potentially impacting their education, health, safety and quality of life. Therefore, we recommend the need for clear face masks and the use of other communication aids, as appropriate, to protect people with hearing and other communication disorders while enhancing their functional communication. ASHA’s advocacy efforts, regarding the needs of individuals with communication disorders, resulted in the updated CDC guidance on “Considerations for Wearing Cloth Face Coverings” and the need for adaptations, especially for those who are deaf or hard of hearing.<sup>3</sup>

ASHA appreciates your consideration of these policy priorities and recommendations for resuming educational activities for the 2020-2021 school year. At this challenging time, we all must work together to provide an environment that allows states to determine the safest and most effective path forward and provide them with the necessary resources to help ensure success in delivering high quality education for the upcoming school year. If you or your staff have any questions, please contact Catherine D. Clarke, ASHA’s director of education policy, at [cclarke@asha.org](mailto:cclarke@asha.org).

Sincerely,



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

cc: Laurie VanderPloeg, Director, Office of Special Education Programs  
David Cantrell, Deputy Director, Office of Special Education Programs

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<sup>1</sup> American Speech-Language-Hearing Association. (2020). Reopening Schools [Advocacy Position]. <https://www.asha.org/Advocacy/Advocacy-Position-on-Reopening-Schools/>.

<sup>2</sup> Grogan-Johnson, S., Alvares, R., Rowan, L., & Creaghead, N. (2010). A pilot study comparing the effectiveness of speech language therapy provided by telemedicine with conventional on-site therapy. *Journal of Telemedicine and Telecare*, 16, 134–139.

<sup>3</sup> Centers for Disease Control and Prevention. (2020). Considerations for Wearing Cloth Face Coverings. <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html>.