



ASHA
American
Speech-Language-Hearing
Association

September 21, 2026

Erin McHugh
Deputy Director
Office of Special Education Programs
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Request for Clarification on the Application of “Pre-Literacy” Under 34 C.F.R. § 303.344(c)¹ and 34 C.F.R. § 303.211(b)(2)²

Dear Deputy Director McHugh:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to request written clarification from the Office of Special Education Programs (OSEP) regarding the scope and application of the term “pre-literacy” as it is used in Part C of the Individuals with Disabilities Education Act (IDEA).

ASHA is the national professional, scientific, and credentialing association for 247,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Our members serve millions of children and adults with communication disorders across the nation’s schools, hospitals, clinics, and other settings, including a substantial number of children with disabilities who receive services under various programs ranging from IDEA to Medicaid.

SLPs identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders. The evidence-based services SLPs provide can be medically necessary and essential to health and independence across the lifespan. In early intervention and school-based settings, SLPs serve as specialized instructional support personnel and related service providers.

Background: Pre-Literacy Under Part C

Part C requires states to address pre-literacy as part of early intervention services. Under 34 C.F.R. § 303.344(c), each Individualized Family Service Plan must include the measurable results or outcomes expected to be achieved for the child and family, “including pre-literacy and language skills, as developmentally appropriate for the child.” In addition, 34 C.F.R. § 303.211(b)(2) requires that services include an educational component that promotes school readiness and incorporates pre-literacy, language, and numeracy skills.

Because Part C does not define “pre-literacy,” some local programs may believe that only a limited interpretation of the term is allowed. This can lead programs to interpret pre-literacy narrowly. For example, some programs may focus primarily on children’s ability to turn the pages of a book, while others may use a broader definition that encompasses the continuum of everyday communication and language experiences that developmental and communication sciences literature identifies as foundations for later literacy.

The Clarification ASHA Is Requesting

ASHA respectfully requests clarification that states and local Part C programs may apply a broader, developmentally grounded interpretation of pre-literacy. Specifically, ASHA requests confirmation that pre-literacy may include early developmental experiences and abilities that support later engagement with spoken, signed, written, and symbolic language. Depending on the individual child, these experiences may include participating in shared storybook routines, songs and rhymes, symbolic and pretend play, oral and signed storytelling, joint attention, and other language-rich everyday routines with caregivers. This approach recognizes pre-literacy as more than a discrete academic skill or a child's contact with books alone.

ASHA believes this clarification would preserve the individualized, family-centered, developmentally appropriate practices that are central to Part C while giving states and providers the flexibility to use a shared, broader, and more workable understanding of pre-literacy. It would also help reduce inconsistent implementation without adding a new compliance burden.

Alignment With the Department's Literacy Priorities

We believe this request aligns with the Administration's current priorities related to literacy. The Secretary has repeatedly identified literacy achievement as a top priority for the Department. The Department's evidence-based literacy supplemental priority calls for promoting proven methods of literacy instruction to strengthen student outcomes.³ The Department has also supported directing funding toward literacy improvement nationwide.

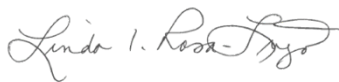
Request

ASHA requests that OSEP clarify whether the broader, developmentally grounded interpretation of pre-literacy described above is allowable and appropriate under Part C. ASHA also requests that OSEP consider issuing guidance for states, Part C lead agencies, and providers—including SLPs, who serve as primary early intervention providers for many infants and toddlers with communication delays and disabilities.

ASHA would welcome the opportunity to discuss this request with OSEP staff and provide any additional information that may be helpful. Thank you for your consideration and for OSEP's continued leadership on behalf of infants and toddlers with disabilities and their families.

If you or your staff have any questions, please contact Bill Knudsen, ASHA's director of education policy, at bknudsen@asha.org.

Sincerely,



Linda I. Rosa-Lugo, EdD, CCC-SLP
2026 ASHA President

¹ U.S. Department of Education. (2017). *Sec. 303.344 Content of an IFSP*.
<https://sites.ed.gov/idea/regs/c/d/303.344>

² National Archives and Records Administration. (2026). § 303.211 State option to make services under this part available to children ages three and older. *Code of Federal Regulations*.

<https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-C/section-303.211>

³ U.S. Department of Education. (2025, September 25). *U.S. Department of Education Releases Secretary McMahon's Meaningful Learning and Workforce Readiness Supplemental Priorities*.

<https://www.ed.gov/about/news/press-release/us-department-of-education-releases-secretary-mcmahons-meaningful-learning-and-workforce-readiness-supplemental-priorities>