



April 20, 2020

Mr. John Sena
New Mexico Public Education Department
Policy Division
300 Don Gaspar Avenue, Room 121
Santa Fe, NM 87501

RE: ASHA Amendment for Proposed Regulations

Dear Mr. Sena:

On behalf of the American Speech-Language-Hearing Association, I write in support of the proposed amendments in Title 6 Primary and Secondary Education, Chapter 31 Special Education, Part 2 Children with Disabilities/Gifted Children, and offer amendments to the section defining the individualized education program (IEP) team.

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. Over 1,400 ASHA members reside in New Mexico and over 50% of them practice in educational facilities.

The proposed regulatory changes include a definition of the IEP team. In 6.31.2.7, Definitions, B (11) (c), ASHA recommends adding the following in italics:

(c) not less than one special education teacher of the child, or where appropriate, not less than one special education provider of the child (*such as audiologists, speech-language pathologists or other specialized instructional support personnel (SISP), as appropriate*).

Overview of Audiologists and Speech-Language Pathologists

Audiology Professional Qualifications

Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments that determine hearing loss, auditory function, balance and related systems, and evaluate, select, and dispense hearing aids. Audiologists also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices.

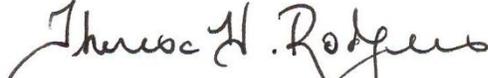
Speech-Language Pathology Professional Qualifications

Speech-language pathologists (SLPs) are highly skilled professionals who, at minimum, hold a master's degree in communication disorders from an accredited program recognized by the U.S. Department of Education. SLPs complete a challenging education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. SLPs identify, assess, and treat a variety of communication disorders involving speech, language, fluency (e.g., stuttering), voice and resonance problems, cognitive communication disorders such as memory, attention and problem-solving disorders, and swallowing and associated feeding disorders. SLPs provide services in a variety of practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

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Thank you for your consideration of ASHA's proposed regulatory amendments to the definition of the IEP Team. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Theresa H. Rodgers". The signature is written in a cursive style with a large, looping initial "T".

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