



ASHA
American
Speech-Language-Hearing
Association

May 12, 2020

The Honorable Frank T. Brogan
Office of Elementary and Secondary Education
Acting Assistant Secretary
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

RE: Proposed Priorities, Requirements, Definition, and Selection Criteria— Education Innovation and Research—Teacher-Directed Professional Learning Experiences (Docket ID ED–2020–OESE–0025)

Dear Assistant Secretary Brogan:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on the April 13, 2020, *Federal Register* notice of proposed priorities, requirements, definition, and selection criteria under the Education Innovation and Research (EIR) program by the Office of Elementary and Secondary Education, U.S. Department of Education (ED).

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 are employed in educational settings. The services provided by ASHA members help ensure students in schools receive a free appropriate public education (FAPE) in the least restrictive environment.

Audiologists and SLPs who work in schools are integral members of the education team. They provide important and valuable services that help students access the general curriculum and are instrumental in designing learning systems for students. A key component to promoting success for children and youth with disabilities is ensuring that **all** educators have the professional development to address diverse academic, social-emotional, and developmental needs. ASHA's members support students, families, and staff from early education through graduation in both general and special education.

All students, including students with disabilities, are general education students first. Whether they receive special education or related services under the Individuals with Disabilities Education Act (IDEA) or accommodations under Section 504 of the Rehabilitation Act of 1973, all students are entitled to receive an appropriate education from the public school system. The Elementary and Secondary Education Act (ESEA)/Every Student Succeeds Act (ESSA) must continue to work in conjunction with IDEA to promote a learning environment in which all children are given the opportunity to become proficient on grade-level content standards including:

- enhancing the integration of IDEA, Section 504, and ESEA to ensure all students, regardless of disability status, receive an appropriate education;
- providing students the opportunity to actively participate in the education process, with full access to learning opportunities, and those around language and communication development; and
- allowing providers of services in schools access to appropriate professional development to serve the needs of students.

ASHA offers the following comments and recommendations on teacher training and related items for your consideration.

Proposed Priorities, Requirements, and Selection Criteria

ED proposes to issue teacher training grants under ESSA Section 4611 Education Innovation and Research (EIR) program, which authorizes the program to "create, develop, implement, replicate, or take to scale entrepreneurial, evidence-based, field-initiated innovations to improve student achievement and attainment for high-need students; and [to] rigorously evaluate such innovations..." Throughout this notice, ED limits its discussion of educators in schools to only "teachers" in the context of proposed priorities, requirements, definition, and selection criteria to support competitions under the EIR program.

Recommendation: ASHA recommends that ED amends the proposed priorities, requirements, and criteria throughout the notice to replace "teacher" with "educator".

Rationale: This change would make other educators/providers of services in schools, including audiologists and SLPs, who play an integral role in the education of children and provide them access to the general curriculum to be eligible for the competitions. This is consistent with ESSA's definition of "professional development" under Section 8002, which utilizes an inclusive definition of educator to include "teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators."

Specialized instructional support personnel (SISP), including audiologists and SLPs, provide critical services to children as a part of the education team, particularly to students with disabilities. Speech-language pathology services are highly utilized in schools, as reported in the U.S. Department of Education's 2019 Annual Report to Congress (41st ARC), which shows that speech or language impairments (42.4%) represent the most prevalent disability category of children ages 3 through 5 served under IDEA Part B. In addition, speech or language impairment was the second or third most prevalent disability category for students ages 6 through 21 in every racial/ethnic group served under IDEA Part B. Educational audiologists also provide valuable services to students who have hearing-related issues by helping them access the general curriculum including appropriate classroom acoustics and service provisions despite the low incidence of hearing loss in the school-aged population.

Comments: ASHA supports interprofessional education (IPE) in schools, which involves individuals from different professions learning about, from, and with each other, including engaging in joint professional development. The ultimate benefit of IPE is that providers learn to collectively integrate methods from all other providers involved to help students attain educational goals. Professional development benefits all educators/providers of services to children and, most of all, benefits the children they serve to succeed in the school system.

SISP have unique roles and responsibilities in schools that include helping students access the general curriculum. Students with disabilities typically receive instructional services from more than one provider, including general educators, special educators, and SISP. As highly trained professionals with specializations, SISP require the opportunity to participate in targeted career-specific professional learning experiences that support their professional growth in helping high-need and other students in school settings access the general education curriculum.

ASHA developed the Performance Assessment of Contributions and Effectiveness (PACE) for Speech-Language Pathologists, which is an evaluation tool for SLPs working in school settings that uses a performance matrix to identify strengths and areas where professional development is needed.¹ PACE provides a basis for school district leaders and SLPs to tailor professional development programs to capitalize on strengths and meet additional needs of SLPs. PACE assesses the unique roles and responsibilities of SLPs in education settings.

Proposed Definition-Professional Learning

Comments: ASHA supports the proposed definition of professional learning and instructional strategies as the recommendations are based on the Learning Policy Institute's best practices (seven pillars) for effective professional development. The attention on personalized, active learning is consistent with ASHA's efforts focusing on the future of learning. ASHA also agrees with the listed permitted learning methods, such as peer shadowing opportunities, virtual mentoring, online modules, professional learning communities, communities of practice, action research, micro-credentials, and coaching support.

Thank you for the opportunity to share these comments and recommendations on proposed regulations for proposed priorities, requirements, definition, and selection criteria under the EIR program. If you or your staff have any questions, please contact Catherine D. Clarke, ASHA's director of education policy, at cclarke@asha.org.

Sincerely,


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

¹ American Speech-Language-Hearing Association. (n.d.). The Performance Assessment of Contributions and Effectiveness (PACE) for SLPs: An Introduction and Overview. Retrieved from <https://www.asha.org/advocacy/state/pace--introduction>.