



1925-2025
Legacy. Impact. Possibilities.

June 13, 2025

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

RE: Proposed Priorities and Definitions-Secretary's Supplemental Priorities and Definitions on Evidence-Based Literacy, Education Choice, and Returning Education to the States

Dear Secretary McMahon:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to provide feedback on the U.S. Department of Education's "Proposed Priorities and Definitions-Secretary's Supplemental Priorities and Definitions on Evidence-Based Literacy, Education Choice, and Returning Education to the States."

ASHA is the national professional, scientific, and credentialing association for 241,000 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. Nearly half (49.6%) of ASHA members work in educational facilities, including early childhood, K-12, and higher education settings.¹ These professionals play a central role in supporting students, families, and school staff in early intervention, early childhood, and both general and special education K-12 settings. Audiology and speech-language pathology services are essential to helping children and students develop effective communication skills and achieve positive learning outcomes in home, community, clinical, and school settings.

Proposed Priority 1: Promoting Evidence-Based Literacy

ASHA supports "effective evidence-based literacy instruction" and the importance of "explicit, systematic, and intentional instruction in phonological awareness, phonic decoding, vocabulary, language structure, reading fluency, and reading comprehension." In alignment with the proposed priority one, **we would like to highlight the pivotal role that educational audiologists and SLPs play in advancing evidence-based literacy:**²

- **Enhancing Early Literacy Through Language Development:** Educational audiologists and SLPs are instrumental in developing students' phonological awareness, vocabulary, and overall language skills, which are foundational components of literacy. Their expertise ensures that students acquire the necessary language competencies to succeed in reading and writing.
- **Supporting Students With Hearing Impairments:** Educational audiologists and SLPs assess and manage hearing-related issues that can delay literacy development. By ensuring optimal auditory access, they enable students to engage

fully in home, community, and classroom instruction; thereby, supporting literacy advancement from birth through the life of a student's academic career.

- **Implementing Evidence-Based Interventions:** Both educational audiologists and SLPs are trained to apply evidence-based strategies tailored to individual needs from birth through adulthood. Their interventions are data-driven, aligning with the Department's emphasis on evidence-based practices.^{3, 4, 5, 6}
- **Collaborating With Teachers and Families:** Educational audiologists and SLPs work closely with teachers and parents in home, community, clinical, and classroom settings to create cohesive support systems, ensuring that literacy interventions are reinforced across a range of settings.

To fully leverage the expertise of educational audiologists and SLPs, it is vital to explicitly include them in policy development. Their involvement in the formulation of literacy policies can ensure interventions are comprehensive and address a range of learner needs regardless of setting. Furthermore, supporting professional development opportunities that can provide training on the collaborative roles of educational audiologists and SLPs can better foster integrated approaches to literacy instruction. This will help ensure adequate funding and resources for the implementation of effective literacy programs. By integrating the specialized skills of educational audiologists and SLPs into literacy initiatives, the Department can enhance the effectiveness of its evidence-based literacy programs, ultimately leading to improved student outcomes.

Proposed Priority 2: Expanding Education Choice

ASHA supports initiatives to expand apprenticeship programs to include educational audiologists and SLPs. Specifically, we support the language under (j)(iv) to "Expand access...at the high school or postsecondary level" for "apprenticeships."⁷ Any revisions to applicable apprenticeship programs should ensure that career pathway opportunities are explicitly available to a wide range of fields, including audiology and speech-language pathology.

We support strengthening the federal workforce personnel pipeline system to explicitly include audiology and speech-language pathology. This includes equal access to all workforce programs across an individual's professional career regardless of setting (e.g., home, clinical, school-based).

There's a critical need for more educational audiologists and SLPs. Federal workforce programs and applicable funding must ensure robust pathway opportunities for both students and adults considering fields such as audiology and speech-language pathology. According to the Bureau of Labor Statistics, the "audiology profession is projected to grow 11% over the 2022–2032 decade" and the "speech-language pathology profession is projected to grow 19%."^{8, 9} This need illustrates how important it is for the federal government to continue to strengthen opportunities available for educational audiologists and SLPs across all federal programs that support apprenticeships.

Apprenticeship programs can serve to expand the workforce pipeline in educational audiology and speech-language pathology by providing accessible entry points for individuals from a range of backgrounds. This aligns with the Department's commitment

to expanding educational choice and ensuring equal access to high-quality education and career opportunities. Apprenticeships offer structured, on-the-job training that is crucial for developing the practical skills required in educational audiology and speech-language pathology. This experiential learning complements academic instruction and prepares apprentices for the complexities of real-world practice. By integrating educational audiology and speech-language pathology into the Department's apprenticeship initiatives, we can address critical workforce needs, enhance educational choice, and improve access to essential services for individuals with communication disorders.

Proposed Priority 3: Returning Education to the States

Unnecessary mandates often contribute to increased paperwork and caseload burdens for educational audiologists and SLPs. Unhelpful paperwork mandates needlessly keep our members from providing direct individually tailored services for infants, toddlers, school-aged children, and adults. It's vital to facilitate an appropriate federal-state relationship that supports families and children. As this priority highlights, "one-size-fits-all mandates from the federal government create obstacles." Practitioners such as educational audiologists and SLPs should be free to "exercise independent professional judgment in recommending and providing professional services when an administrative mandate, referral source, or prescription prevents keeping the welfare of persons served paramount."¹⁰

There are some federal requirements that could be clarified to ensure the Individualized Education Program (IEP) team and family ultimately make the educational, intervention, and assessment decisions for their students. For instance, as it relates to the 1% cap under the Every Student Succeeds Act, the Department should make it clear that the Individuals with Disabilities Education Act (IDEA) is the controlling statute and that professional best judgment and the IEP team should have the final say on if Part B students are assessed using alternative academic achievement standards for students with the most significant cognitive disabilities. Regarding unnecessary paperwork burdens that impact educational audiologists and SLPs, the Department should ensure all applicable federal requirements are specifically tied to statute. For instance, the Annual Performance Report (APR) measurement tables under Part B and Part C of IDEA.^{11, 12}

ASHA strongly supports the continued existence of an independent, cabinet-level Department of Education. The Department plays a fundamental role in enforcing legal protections for students, particularly those with disabilities, and in supporting educators by elevating best practices. It complements the efforts of state and local education agencies to ensure a quality education and related support for all students and their families.

These priorities highlight that the Department still has a critical role to play in supporting families, states, and educators in ensuring academic success for all students. Educational audiologists and SLPs regularly work in environments funded by federal discretionary grant initiatives serving infants, toddlers, school-aged children, and adults in home, community, clinical, and educational settings. They are highly utilized in federally supported programs ranging from Part B, C, and D of IDEA to school-based Medicaid and vocational rehabilitation. For example, according to the Department's *45th Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act, 2023*, speech or language impairments account for the second-largest percentage (34%) of primary eligibility disabilities in children ages 3 to 5 receiving early childhood services under IDEA Part B.¹³

If you or your staff have any questions, please contact Bill Knudsen, ASHA's director of education policy, at bknudsen@asha.org. Thank you for the opportunity to provide feedback.

Sincerely,



A. B. Mayfield-Clarke, PhD, CCC-SLP
2025 ASHA President

¹ American Speech-Language-Hearing Association. (2025). *2024 Member & Affiliate Profile*. <https://www.asha.org/siteassets/surveys/2024-member-affiliate-profile.pdf>

² American Speech-Language-Hearing Association. (n.d.). *Written Language Disorders*. https://www.asha.org/practice-portal/clinical-topics/written-language-disorders/#collapse_1

³ American Speech-Language-Hearing Association. (2024). *The Value of School-Based Speech-Language Pathology Services for Preschoolers*. <https://www.asha.org/research/ebp/demonstrating-your-value/the-value-of-school-based-speech-language-pathology-services-for-preschoolers/>

⁴ American Speech-Language-Hearing Association. (2024). *The Value of School-Based Speech-Language Pathology Services for Elementary School Children*.

<https://www.asha.org/research/ebp/demonstrating-your-value/value-of-school-based-slp-services-for-elementary-school-children/>

⁵ American Speech-Language-Hearing Association. (2024). *The Value of School-Based Speech-Language Pathology Services for Adolescents*. <https://www.asha.org/research/ebp/demonstrating-your-value/value-of-school-based-slp-services-for-adolescents/>

⁶ American Speech-Language-Hearing Association. (2024). *The Value of the Speech-Language Pathologist (SLP) in Schools: Prevention and Response to Intervention*.

<https://www.asha.org/research/ebp/demonstrating-your-value/value-of-the-speech-language-pathologist-in-schools-prevention-and-response-to-intervention/>

⁷ U.S. Department of Education. (2021, May 21). *Proposed Priorities and Definitions-Secretary's Supplemental Priorities and Definitions on Evidence-Based Literacy, Education Choice, and Returning Education to the States*. <https://www.federalregister.gov/d/2025-09093/p-66>

⁸ American Speech-Language-Hearing Association. (2024). *Supply and Demand Resource List for Audiologists*. <https://www.asha.org/siteassets/surveys/supply-demand-audiology.pdf>

⁹ American Speech-Language-Hearing Association. (2024). *Supply and Demand Resource List for Speech-Language Pathologists*. https://www.asha.org/siteassets/surveys/supply-demand-slp.pdf?srsId=AfmBOoD_VHDry5GVwtf16iL5hEgWtyZpoDvGRCfcYdNtMNMq50zV4p

¹⁰ American Speech-Language-Hearing Association. (n.d.). *Issues in Ethics: Prescription*. <https://www.asha.org/practice/ethics/prescription/#:~:text=Principle%20of%20Ethics%20IV%2C%20Rule%20B%20of,are%20in%20conflict%20with%20their%20professional%20judgment>

¹¹ U.S. Department of Education. (2023). *Part B State Performance Plan (SPP) and Annual Performance Report (APR) Indicator Measurement Table*. <https://sites.ed.gov/idea/files/FFY2023-Part-B-SPP-APR-Reformatted-Measurement-Table.pdf>

¹² U.S. Department of Education. (2023). *Part C State Performance Plan (SPP) and Annual Performance Report (APR) Indicator Measurement Table*. <https://sites.ed.gov/idea/files/FFY2023-Part-C-SPP-APR-Reformatted-Measurement-Table.pdf>

¹³ U.S. Department of Education, Office of Special Education and Rehabilitative Services, Office of Special Education Programs. (March 2024). *45th Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act, 2023*. <https://sites.ed.gov/idea/files/45th-arc-for-idea.pdf>