



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

February 15, 2018

The Honorable Lamar Alexander
Chairman
Committee on Health, Education, Labor and Pensions
United States Senate
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Chairman Alexander:

On behalf of the American Speech-Language-Hearing Association, I write to offer feedback on the Higher Education Accountability staff white paper released by the Senate Committee on Health, Education, Labor and Pensions (HELP).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

As the Committee moves to reauthorize the Higher Education Act (P.L. 89-329), ASHA would like to share with you three foundational recommendations for your consideration:

1. Protect current eligibility requirements for programmatic accreditors, while allowing the U.S. Department of Education to monitor and sanction those accreditors that fail to comply with recognition criteria.
2. Exempt programmatic accreditors from gainful employment accountability as it pertains to student loan repayment.
3. Ensure that students seeking a clinical doctorate in audiology or a master's degree in speech-language pathology have access to appropriate levels of federally-funded student loans.

Background

Audiologists and speech-language pathologists (SLPs) are health care practitioners that practice in health care and school-based settings. Individuals who wish to practice as an audiologist must earn a clinical doctorate degree, and individuals who wish to practice as a speech-language pathologist must earn a master's degree. Employment of audiologists and SLPs is projected to grow 21% and 18% respectively between 2016 and 2026. This employment growth is notably faster than the average growth of all occupations.¹ As more Americans grow older, there will be more instances of health conditions that may cause speech or language impairments, such as strokes or dementia, as well as instances of hearing loss.

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.

Following are our comments on the Senate HELP Committee's white paper on Higher Education Accountability.

Accreditation

General Comments

- ASHA supports the continuation of current accrediting agency recognition requirements as part of the efforts to ensure quality education by providing accreditation and oversight. Changes to current accreditation agency requirements could put agencies in jeopardy by making programmatic reviewers ineligible to continue in their important role, and subsequently harm the students of these programs by undermining the utility of their degrees while making those degrees more expensive. Many licensure laws reference graduation from an accredited institution or program as a contingency of licensure. Statutory changes to the Higher Education Act (HEA) would result in financial burdens to accrediting agencies that will trickle down to the programs and institutions. Increased costs potentially jeopardize the sustainability of programs. Further, increased requirements on accrediting agencies without Title IV gatekeeper responsibilities may result in such agencies no longer seeking recognition, which could result in jeopardizing the eligibility of graduates for licensure or employment. Accreditation is tied to the ability to be hired for positions in federal agencies, such as the Veterans Administration and for reimbursement under many third-party health plans including Medicare and Medicaid.
- For many years, ASHA has supported the accreditation of entry-level programs in the professions of audiology and speech-language pathology, currently conducted by the Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA). Our support is given in such a way that ensures a non-biased program accreditation, as the CAA has full and outright authority and autonomy to set standards, policies, and procedures, as well as to make accreditation decisions on programs without influence from any entity. ASHA has provided stable, ongoing financial support to ensure the high-quality education programs that prepare graduates with the knowledge and skills needed to competently practice in all settings. This support keeps programs' annual fees low and the accreditation program's staff and volunteers focused on quality assessment of the 348 graduate education programs in these professions. The Secretary of Education has continuously recognized the CAA as a programmatic (specialized) accrediting body since 1967.
- ASHA supports continuation of the current eligibility requirements for programmatic accreditors, such as the CAA, to continue its work by providing eligibility for programs to non-Title IV funding opportunities and supporting programs in unstable financial times. We urge Congress not to impose any modifications to current law as mandated in the House of Representative's PROSPER Act, which require agencies to be "separately incorporated and independent" unless those conditions applied before 1991. These changes have the potential to increase costs of accreditation that have no direct link to an agency's ability to assess educational quality and take actions on the entities they accredit, such as mandating legal separation from any parent organization as a means to eliminate any undue influence.

Trends and Factors Driving the Need for a New Paradigm for Title IV Eligibility

On page 7 of the white paper, Committee staff state that accreditors "are responsible for determining acceptable indicators of quality and student learning." ASHA supports the concept that the federal government should not insert bright line thresholds for student learning or educational outcomes including completion and graduation rates. The focus of quality education programs must continue to be on the knowledge, skills, and abilities of the graduates to achieve employment as competent practitioners in their selected profession.

Principles and Specific Proposals for an Updated Accountability Framework

The white paper proposes a broader role for the federal government in regard to reviewing standards of employment but notes that there could be unwanted impact of programs that are providing “robust returns for students.”

Comments

- ASHA recommends that Congress not shift the obligations for accountability outlined in the white paper to agencies not recognized as a Title IV gatekeeper. While the white paper proposes a more focused review of loan repayment and student success at the program level, clarification is needed on any proposals as to which entity (e.g., institution, state, institutional accreditor, programmatic accreditor) would be ultimately held accountable. Or, as the white paper suggests, if it would be an indicator for the federal government or institution to allocate resources to support the effected program and students.
- Requiring programmatic accreditors to be held accountable for student loan repayment is problematic. These agencies are not staffed to support this kind of additional financial monitoring. Systems would need to be developed and professional staff hired, which would shift from the main focus of specialized and programmatic accreditors to assess the quality of education programs to prepare students with the knowledge, skills, and abilities to enter the workforce as competent practitioners. This type of change would increase costs for the accreditation process.
- Currently, 15 of the nationally recognized accrediting agencies are not Title IV gatekeepers and, therefore, are not required to monitor Title IV activities as that is conducted at the institutional level.² Further, another 19 recognized specialized or programmatic agencies have limited Title IV gatekeeper responsibilities that only apply to freestanding institutions in their professional area or specific levels of programming (e.g., internships, residencies).
- Since not all programs in a university have an accrediting agency that establishes standards and assesses the quality of those educational programs, consideration needs to be given to:
 - who would conduct a programmatic review;
 - how results of such a review would be considered; and
 - which entity would be responsible to implement and monitor any corrective measures

Gainful Employment

Comments

- On page 10 of the white paper, Committee staff address the return on investment for students and taxpayers, specifically stating that “taxpayers will lend money for students to obtain a quality education that increases their economic prospects and ability to contribute to society, with the expectation that they will repay their loans after they complete their education.”

While loan repayment is an important consideration, repayment should not be the only or the most important factor to consider when determining gainful employment as part of eligibility requirement for federal loans and determining the value of the educational program. Other factors to consider for gainful employment include stable employment status, job growth, salary, career satisfaction, and retention of professionals in the field.

- There is a wealth of data to suggest that graduate programs that prepare audiologists and SLPs for clinical practice meet these criteria.

Audiologists and SLPs show high rates of employment:

Employment status: 91.3% of ASHA's membership and affiliation are employed full time or part time, with only 1.0% unemployed and seeking work (and 7.7% retired, on leave of absence, or unemployed but not seeking work).³

- ASHA is concerned with the topic in the white paper on the ability of graduates to repay student loans. The data below support the position that a graduate degree in audiology or speech-language pathology gives taxpayers a good return on their investment in student loans, and these practical factors should be considered when determining gainful employment standards for program and institutional eligibility for federal funds.

After graduation, audiologists and SLPs show the following earnings:

- Median or average salaries for audiologists in 2016 was \$75,980 per year or \$36.53 per hour.⁴
- Median or average salaries for SLPs in 2016 was \$74,680 per year or \$35.90 per hour.⁵

- ASHA is concerned with the suggested systems described in the white paper on loan repayment systems to determine eligibility for Title IV funds, specifically, the reliance on a set time period to pay some portion of the loan without distinguishing between students who are deferring vs. defaulting on their loans. A graduate degree can be a crucial part of preparing future clinicians for a productive career, especially in careers such as audiology and speech-language pathology where a graduate degree is necessary for independent practice in the profession.

A student who defers an undergraduate loan to attend graduate school should not be grouped with a former student who defaults on a loan, as their ability to contribute to society and to eventually pay off their loans is not equivalent. Loan repayment systems described in the white paper listed time periods of 3-5 years during which borrowers would be expected to begin repaying their loans. This limited time period would unfairly penalize borrowers attending graduate school who deferred their loans since graduate programs may extend beyond that period. Therefore, ASHA believes that borrowers deferring their loan payments in order to attend graduate school should not be included in measures of loan repayment until they have completed their graduate education.

Federal Student Loans/Loan Forgiveness

Comments

- ASHA requests that any reauthorization of the HEA should ensure that audiologists and SLPs who work with individuals who have communication and hearing disorders should benefit from federal loan forgiveness in a qualifying employment under the public service and the teacher loan forgiveness programs. Loan forgiveness programs and grants (e.g., TEACH grants) should be maintained in a reauthorized HEA. These individuals are critical to ensuring that people with disabilities have access to the range of services and supports they need. Audiology and speech-language pathology students are incurring increasing student loan debt as the cost of obtaining a bachelor's degree, master's and clinical doctorate degrees

continue to rise. Providing student debt relief helps to alleviate the financial burden on audiology and speech-language pathology students.

- ASHA requests Congress to reject proposals by the current Administration that would make graduate education more expensive and harder to repay. In the President's fiscal year 2019 budget request proposal, there are changes to eliminate "inefficient subsidies" including eliminating the Public Service Loan Forgiveness and Subsidized Stafford loans, all aimed to simplify the student loan programs.

All policies for student loans would apply to loans originated on or after July 1, 2019, with an exception for students who borrowed their first loans prior to July 1, 2019, and who are borrowing to complete their current course of study. These policies together would save approximately \$203 billion over 10 years, according to the request.

Thank you for the opportunity to provide comments on the Higher Education Accountability white paper released by the Senate HELP Committee. If you or your staff have questions, please contact Ingrida Lusic, ASHA's director of federal & political affairs, at ilusic@asha.org.

Sincerely,



Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President

¹ Bureau of Labor Statistics, U.S. Department of Labor. (2018) *Occupational Outlook Handbook*, Speech-Language Pathologists. Retrieved from <https://www.bls.gov/ooh/healthcare/speech-language-pathologists.htm>.

² U.S. Department of Education. (n.d.). Accreditation in the United States; Nationally Recognized Accrediting Agencies. Retrieved from https://www2.ed.gov/admins/finaid/accred/accreditation_pg5.html#NationallyRecognized.

³ American Speech-Language-Hearing Association. (2018). ASHA summary membership and affiliation counts, year-end 2017. Available from <http://www.asha.org>.

⁴ Bureau of Labor Statistics, U.S. Department of Labor. (2018) *Occupational Outlook Handbook*, Audiologists. Retrieved from <https://www.bls.gov/ooh/healthcare/audiologists.htm>.

⁵ Bureau of Labor Statistics, U.S. Department of Labor. (2018) *Occupational Outlook Handbook*, Speech-Language Pathologists. Retrieved from <https://www.bls.gov/ooh/healthcare/speech-language-pathologists.htm>.