



September 11, 2018

Ms. Diane Jones
Office of Postsecondary Education
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Dear Ms. Jones:

On behalf of the American Speech-Language-Hearing Association, I write to comment on the August 14, 2018, *Federal Register* notice of proposed rulemaking (NPRM) from the U.S. Department of Education (ED) that proposes to rescind the gainful employment (GE) regulations under the Higher Education Act of 1965, as amended.

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 (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students.

ASHA supports ED's proposal to rescind the GE regulations. We are pleased to provide the following comments on the NPRM that encourages ED's systematic engagement with stakeholders including institutions of higher education, accreditors, other government agencies, and student representatives to determine the best path forward in the development of an updated College Scorecard.

Measuring Gainful Employment

While loan repayment represents an important element for determining GE compliance, it should not be the only or most important factor in determining the value of an educational program. Other factors to consider include stable employment status, job growth, salary, career satisfaction, and retention of professionals in the field.

ASHA and Bureau of Labor Statistics data both demonstrate outcomes that audiology and speech-language pathology graduate programs meet the criteria of GE regulations.

- 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).¹
- Median or average salaries for audiologists in 2016 was \$75,980 per year or \$36.53 per hour.²
- Median or average salaries for SLPs in 2016 was \$74,680 per year or \$35.90 per hour.³

Flawed Debt to Earning Rates Measure: Inappropriate Categorization of Graduate School Loan Deferment

A graduate degree is a necessary part of preparing future clinicians for a productive career in audiology and speech-language pathology. A student who defers an undergraduate loan to attend graduate school should not be grouped with a former student who defaults on a loan because their ability to contribute to society and to eventually pay off their loans is not equivalent. An individual pursuing an advanced degree is engaging in an activity that enhances their future earning and career path, which makes categorizing individuals who have obtained a deferment with others who are in default flawed.⁴ Therefore, ASHA maintains 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.

Concerns about Disclosures Required under the GE Regulations

ASHA notes that ED plans to update the College Scorecard or a similar web-based tool to provide program-level outcomes including, at a minimum, median debt and median earnings for all higher education programs for all title IV participating institutions.

Institutions and programs do not always know the employment status (even first employment) of all graduates. In addition, institutions and programs report continued difficulty in obtaining employment, financial, and other data from graduates as well as the ability to verify the data, as requested in some sectors. ASHA supports eliminating programs and institutions from the middle-man role in collecting and reporting financial information to ED, especially for federal aid programs in which ED or other federal agencies would have this type of data.

Due to variability in earnings data, job placement definitions, and the data collection burden to programs and institutions noted above, ASHA opposes using these metrics in the development of any updated College Scorecard or similar web-based tool. Additionally, ASHA urges systematic engagement with stakeholders, including institutions of higher education, accreditors, other government agencies, and student representatives to determine the best path forward.

It is unclear when it is best to measure the return on investment (ROI) from a degree or education program. Professional salaries grow significantly from first employment to mid-career status.⁵ Using salary data based on several years of experience better reflects how ROI unfolds over time in general and specifically for audiologists and SLPs.⁶ Recognized accrediting agencies use job placement/employment rates as a student outcome measure but variability in the definition of job placement/employment used by accreditors make accurate and consistent comparison difficult.

ASHA urges ED not to hold programmatic accreditors, which are not Title IV gatekeepers, accountable for student loan repayment. These agencies are not staffed to support additional financial monitoring, as this is not part of current recognition requirements nor their mission. Data tracking and collection systems would need to be developed and professional staff hired that would distract from the main focus of specialized and programmatic accreditors, which is assessing the quality of education programs to prepare students with the knowledge, skills, and abilities to enter the workforce as competent practitioners.

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Thank you for the opportunity to provide comments on the August 14, 2018, *Federal Register* NPRM. If you or your staff have questions, please contact Catherine Clarke, ASHA's director of education policy, at cclarke@asha.org.

Sincerely,



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

¹ American Speech-Language-Hearing Association. (2018). *ASHA summary membership and affiliation counts, year-end 2017*. Retrieved from <http://www.asha.org>.

² Bureau of Labor Statistics, U.S. Department of Labor. (2018). *Occupational Outlook Handbook, Audiologists*. Retrieved from <https://www.bls.gov/ooh/healthcare/audiologists.htm>.

³ 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>.

⁴ Business Wire A Berkshire Hathaway Company. (2011). *CareerBliss Data Reveals the Top 10 Jobs Where Having a Master's Degree Pays Off*. Retrieved from <https://www.businesswire.com/news/home/20110817006495/en/CareerBliss-Data-Reveals-Top-10-Jobs-Master%E2%80%99s>.

⁵ American Economic Association. (2014). *Career Earning: What economists can expect to earn in different fields*. Retrieved from <https://www.aeaweb.org/resources/students/careers/earnings>.

⁶ American Speech-Language-Hearing Association. (2017). *SLP Health Care Survey: Annual Salary Report*. Retrieved from <https://www.asha.org/uploadedFiles/2017-SLP-Health-Care-Survey-Annual-Salary-Report.pdf>.