



**ASHA**  
American  
Speech-Language-Hearing  
Association

October 5, 2020

The Honorable Mark Schneider, PhD  
Institute for Education Sciences  
U.S. Department of Education  
550 12th Street, SW  
Washington, DC 20024

Re: Agency Information Collection Activities; Comment Request; Implementation of Key Federal Policies in the Wake of the Coronavirus Pandemic (ED-2020-SCC-0129)

Dear Director Schneider:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to offer comments on the August 6, 2020, *Federal Register* notice on Information Collection Activities on Implementation of Key Federal Policies in the Wake of the Coronavirus Pandemic.

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 and cochlear implants. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, swallowing and cognitive impairments. More than half of all ASHA members work in educational settings and provide services to students in regular and special education.

ASHA offers the following comments/recommendations on information collection on Implementation of Key Federal Policies in the Wake of the Coronavirus Pandemic.

***(1) Is this collection necessary to the proper functions of the Department?***

Yes, this collection is necessary. ASHA supports collecting this data as we go through the coronavirus pandemic and assessing its impact on state education agencies (SEAs) and local education agencies (LEAs) in a timely manner.

***(4) How might the Department enhance the quality, utility, and clarity of the information to be collected?***

**General Comments**

ASHA affirms that the Department should collect this data on all students, including students with disabilities, as students with disabilities are, first and foremost, general education students, and state and local authorities must meet their needs through additional academic support in order to access the general curriculum. Whether students receive accommodations and/or modifications under the Every Student Succeeds Act (ESSA) (20 USC 7801), Section 504 of the Rehabilitation Act of 1973, or special education and related services under the Individuals with Disabilities Education Act, all students are entitled to an appropriate education from the public school system. Students require access to technology and the internet in order to receive an appropriate education during the coronavirus pandemic. Also, with online instruction, students

with special needs require accessible formats in order to access the curriculum and make adequate progress toward their goals and objectives.

## District Survey

### Section 2. Supports for Schools

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#### *Question 2-1*

**Recommendations:** Replace the current 2-1(c) with the following bold language below, as follows:

**Number of other specialized instructional support personnel**

Alternatively, following line (f), insert a new line, as follows:

**Number of other specialized instructional support personnel**

**Rationale:** Broadening this list to include all specialized instructional support personnel (SISP), is important to collect information on all SISP. ESSA specifically defines SISP and the term encompasses more staff members such as educational audiologists, SLPs, school social workers, and school psychologists. Data on these and other categories must be captured so districts can gain a greater understanding of all service providers to assist in their decision-making to allocate funds, materials, or other support.

#### *Questions 2-3 through 2-7*

**Recommendation:** Amend (e) in these sections to include **instructional technology equipment**, adding the following bolded language:

Preparing, arranging, and maintaining **instructional technology equipment and** school facilities to support social distancing.

**Rationale:** Audiologists and SLPs may require additional equipment, such as document cameras and additional alternative and augmentative communication devices (AAC), to maintain proper social distancing in school settings and educational effectiveness. Therefore, staff require additional professional development on such equipment.

**Recommendation:** Amend 2-7 (a), (d), (e), (f) to include SISP, adding the following bolded language:

- a. Technical assistance or professional development for district staff, **specialized instructional support personnel**, or principals on instruction in a remote learning environment.
- d. Technical assistance or professional development for district staff, principals, **specialized instructional support personnel**, or teachers on keeping students engaged in a remote learning environment and/or re-engaging students who have lost contact.
- e. Technical assistance or professional development for district staff, principals, **specialized instructional support personnel**, or teachers on identifying and

implementing strategies to address the needs of English learners in a remote learning environment.

f. Technical assistance or professional development for district staff, principals, **specialized instructional support personnel**, or teachers on identifying and implementing strategies to address the needs of students with disabilities in a remote learning environment.

**Rationale:** ESSA specifically defines SISP and the term encompasses more staff members such as educational audiologists, SLPs, school social workers, and school psychologists. Data on these and other categories must be captured to gain understanding of the additional funding used to fill these essential positions.

**Questions 2-7, 2-8**

**Recommendation:** Amend (d) in these sections with the following bold language, as follows:

d. Supporting students' social, emotional, **communication**, and mental health needs

**Rationale:** Supporting students' communication needs is essential for learning and access to the general curriculum. Communication needs may differ when implementing distance learning and hybrid learning models in some classrooms as compared to communication needs in a standard classroom setting. For example, communication needs for students who are deaf or hard of hearing may include the need for live captioning, a live interpreter during distance learning lessons, or speech and language therapy.

**Question 2-8**

**Recommendation:** Add a new (i) with the following bold language:

**Funding, materials, or technical assistance on personal protective equipment use that meets state coronavirus health and safety guidelines**

**Rationale:** Providers need professional development training on best practices on the use of personal protective equipment (PPE), as audiologists, SLPs, and other SISP require PPE when providing in-person services. Also, it's important to collect data on the use of funds for PPE and if states target funding in a specific manner.

**Question 2-11**

**Recommendation:** Amend 2-11(a) with the following bold language:

a. Increase the number of school counselors/ psychologists/social worker **and other specialized instructional support personnel**

**Rationale:** Include data collection, funding, and technical assistance on all SISP, as they are critical to the education of all students and play an important role in the health and safety of school communities. Schools nurses and counselors are among SISP defined in Section 8002 of ESSA

**(A)**Specialized instructional support personnel. The term "specialized instructional support personnel" means—

- (i) school counselors, school social workers, and school psychologists; and
- (ii) other qualified professional personnel, such as school nurses, speech language pathologists, and school librarians, involved in providing assessment, diagnosis, counseling, educational, therapeutic, and other necessary services

(including related services as that term is defined in section 602 of the Individuals with Disabilities Education Act (20 U.S.C. 1401)) as part of a comprehensive program to meet student needs.

### **Section 3. Measuring Student and School Improvement**

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#### **Questions 3-3, 3-4**

**Recommendation:** Replace the current (g) identifying students with disabilities in 3-3 and 3-4 with the following bold language:

#### **Identifying and referring at-risk students to a Child Find team**

**Rationale:** It is important to identify all at-risk children to ensure state and local authorities meet their needs and additional academic support in order to access the general curriculum. Data from state summative assessments is not only data needed to identify students with a specific disability. They are a singular piece of information that may be used as a referral source to a Child Find team for a more comprehensive evaluation.

### **Section 4. Federal Funding**

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#### **Questions 4-4, 4-5**

**Recommendation:** Amend 4-4(c) to include the following bold language:

Training to help teachers **and specialized instructional support personnel** provide instruction in a distance learning environment

**Rationale:** SISP, an important part of the school team, also need professional development training on best practices on distance/remote learning that will benefit those they serve.

**Recommendation:** Amend 4-5 (c) to include the bold language, as follows:

Modifying cleaning and sanitation procedures to minimize the spread of infection diseases, including purchasing supplies, **equipment**, training, or expanding staff

**Rationale:** Include equipment in this list as SISP often use a variety of equipment when providing services. For example, audiologists and SLPs use document cameras and AAC to maintain proper social distancing in school settings while maintaining educational effectiveness.

#### **Questions 4-7, 4-10, 4-11**

**Recommendation:** Amend these categories to include the following response option in bold:

#### **Specialized instructional support personnel**

**Rationale:** ESSA explicitly defines SISP, and the term encompasses more staff members such as educational audiologists, SLPs, school social workers, and school psychologists. It's essential to capture data on these and other categories to gain understanding of what additional funding was used to fill these essential positions.

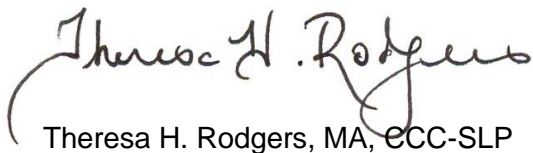
### **State Education Agency Survey**

**Comments:** While the state survey questions are important and help gauge the overall impact of the pandemic on student learning, the survey is long and burdensome. SEAs and LEAs

require additional guidance and appropriated funds from the Department. Given the current shortfalls in state and state education budgets, with the expectation that SEAs provide significant support to LEAs regarding aspects of virtual learning, additional guidance and funds is even more critical. Furthermore, states may require additional time and funds to create mechanisms that will capture this important information on student participation and gaps in access to internet services during the coronavirus pandemic.

Thank you for your consideration of ASHA's comments on these important data collection activities during the coronavirus pandemic. If you or your staff have any questions, please contact Catherine D. Clarke, ASHA's director of education policy, at [cclarke@asha.org](mailto:cclarke@asha.org), or Tim Nanof, ASHA's director of health care and education policy, at [tnanof@asha.org](mailto:tnanof@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, sweeping initial 'T' and 'R'.

Theresa H. Rodgers, MA, CCC-SLP