



AMERICAN  
SPEECH-LANGUAGE-  
HEARING  
ASSOCIATION

September 9, 2018

The Honorable Paul Ryan  
Speaker of the House  
U.S. House of Representatives  
1233 Longworth House Office Building  
Washington, DC 20515

The Honorable Nancy Pelosi  
Democratic Leader  
Committee on Education and the Workforce  
U.S. House of Representatives  
233 Cannon House Office Building  
Washington, DC 20515

Dear Speaker Ryan and Leader Pelosi:

On behalf of the American Speech-Language-Hearing Association, I write to express concern with several provisions of the Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act (H.R. 4508). These include burdensome changes to program accreditation requirements, the elimination of the Public Health Services Loan Forgiveness program, and limiting graduate school student loans for allied health professionals including audiologists and speech-language pathologists.

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. ASHA advocates in the interest of our members, the professions, and the individuals they serve.

### **Accreditation**

ASHA maintains that it is critical to 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. State licensure laws and national certification examinations are tied to graduating from accredited programs. Changes in the PROSPER Act would negatively impact licensure and certification for health care and education professionals in many states. The PROSPER Act would place increased regulatory and administrative burden on program accreditors, which would be onerous to non-Title IV fund gatekeepers.

Since most programmatic accreditors are not Title IV gatekeepers, ASHA opposes placing obligations for accountability on them; such responsibilities should remain with the Title IV gatekeepers. Clarification is needed on any proposals regarding which entity (e.g., institution, state, institutional accreditor, programmatic accreditor) would be held accountable.

Current proposals in the PROSPER Act threaten to drive up the cost of program accreditation, which would be passed down as increased fees and tuition for the students. This runs contrary to the goal of PROSPER, which is to bring down the cost of education for students. Programmatic accreditation agencies that are not able to comply with all of the proposed regulatory and administrative burdens could lose their recognition by the U.S. Secretary of Education. Licensure laws that are tied to program accreditation, as is the case in most states for audiology and speech-language pathology, would be affected and the employability of graduates seeking licensure in such states would be threatened.

Currently, 15 of the nationally recognized accrediting agencies are not Title IV gatekeepers and are not required to monitor Title IV activities because that responsibility is conducted at the institutional level.<sup>1</sup> In addition, another 19 recognized but more specialized programmatic accrediting agencies have limited Title IV gatekeeper responsibilities that only apply to freestanding institutions in their professional area or to specific levels of programming (e.g., internships, residencies).

Not all university programs have an accrediting agency that establishes standards and assesses the quality of those educational programs; therefore, 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

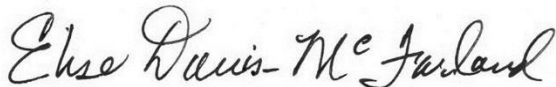
### **Access to Student Loans**

ASHA members are required to attain a graduate degree in order to attain a license to practice as an audiologist or speech-language pathologist. These individuals should have access to federally-funded student loans to meet the educational requirements of the fields. The graduate student loan limits in PROSPER will prevent numerous students from pursuing these fields where workforce shortages already exist. Additionally, the elimination of the Public Health Service Loan Forgiveness program removes a strong incentive for individuals to enter traditionally lower paying, but critically important, public service fields.

ASHA maintains that these provisions may have an unintended consequence of exacerbating health care shortages in professions that are in high demand. Audiology and speech-language pathology have been recognized by the Bureau of Labor Statistics as projected to grow faster than average through 2020.<sup>2,3</sup> Moreover, higher education policies should increase rather than reduce the ability to educate and train more health care and education professionals to meet the growing demand across all service delivery models and settings. Arbitrary caps should not limit access to funding and higher education.

Thank you for the opportunity to provide comments on the PROSPER Act. ASHA looks forward to working with you on improving this bill with the goal of making higher education accessible to all Americans who seek that opportunity. If you or your staff have any questions, please contact Ingrida Lusic, ASHA's director of federal and political affairs, at [ilusic@asha.org](mailto:ilusic@asha.org).

Sincerely,



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

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<sup>1</sup> 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](https://www2.ed.gov/admins/finaid/accred/accreditation_pg5.html).

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

<sup>3</sup> 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>.