



March 27, 2023

Ms. Melissa Escalante
Office of English Language Acquisition
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Dear Ms. Escalante:

On behalf of the American Speech-Language-Hearing Association, I write to comment on the Office of English Language Acquisition's (OELA) request for information to help discover what practices are currently being used to recruit, hire, train, and retain interpreters and translators for services within early childhood through secondary educational settings.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. According to the 2022 Member and Affiliate Profile of ASHA Constituents, more than half (50.4%) of SLPs work in schools and about 8% of audiologists' primary employment facility is schools.¹ ASHA's vision is to make *effective communication, a human right, accessible and achievable for all*.

ASHA's Code of Ethics specifies that members use every resource, including interprofessional collaboration and evidence-based clinical judgement, to ensure culturally and linguistically appropriate service delivery. We have a plethora of resources on standards and practices, written policies, and training to guide and support our members. Therefore, when a professional is not proficient in the language(s) used by the student and/or family, they should collaborate with a trained interpreter.² This is why attention to recruitment, hiring, training, and retention of educational language professionals is an important topic to us.

We appreciate OELA's willingness to consider a wide range of feedback on "policies and practices that are specifically relevant to interpreters and translators in all education settings across States, districts, and schools..."

ASHA members have reported on a range of issues that could be improved. For example, there is a lack of access to interpreters for service delivery including funding and lack of support for ongoing access in intervention, even if transitional. Many members only receive support for evaluations, as outlined by the Individuals with Disabilities Education Act (IDEA). Another common challenge for ASHA members working in this space is the limited training or overreliance on bilingual staff who are not educational interpreters or translators, which could compromise quality of service delivery, confound the roles of bilingual staff/professionals, and/or minimize family engagement/support.

Effective speech-language and/or hearing assessment and intervention may require collaboration with an interpreter and translator in order to ensure linguistically appropriate services.³ The audiologist is the education team member with comprehensive knowledge about hearing loss and the impact of unaddressed hearing loss on speech and language development, communication and learning. SLPs work to prevent, assess, diagnose, and treat

speech, language, social communication, cognitive-communication, and swallowing disorders across the lifespan. Audiologists and SLPs in schools have integral roles in education—ranging from evaluations and meetings to providing support during clinical and school-based interventions—and are essential members of school faculties.

ASHA outlines the unique and appropriate roles and responsibilities of audiologists and SLPs when collaborating with an interpreter, transliterator, or translator to include the following:

- Identifying clinical exchanges for which collaborating with an interpreter, transliterator, or translator is necessary.
- Identifying the appropriate language(s) of service for students/families including identifying the preferred language for meetings, services, and written documentation.
- Advocating for access to an interpreter, transliterator, or translator.
- Making advance arrangements to ensure appropriate physical accommodations (e.g., space, lighting, noise) necessary for successful collaboration, including placement of phone, computer, and/or video screen to ensure visibility and audibility during remote sessions.
- Creating a foundation for successful collaboration, including:
 - scheduling additional time in sessions to accomplish goals;
 - verifying the cultural appropriateness of assessment and treatment materials and reviewing potential bias;
 - reviewing prompts in assessment materials for linguistic influences of additional languages and consulting with experts and resources to review phonetic information and potential syntactic influences;
 - arranging for documents written in unfamiliar languages to be translated, to ensure that they, as clinicians, are aware of the content of the documents; and
 - understanding that the translation of written material from English to a non-English language may alter the intent and overall readability of the document.
- Understanding that not all spoken and manually coded languages, including American Sign Language (ASL), have a written form.
- Seeking an interpreter, transliterator, or translator who has knowledge and skills that include:
 - having native or near-native proficiency in the appropriate language(s), dialect(s), and communication system(s)—and the ability to provide accurate interpretations, translations, and transliterations;
 - understanding the student's/family's particular culture and speech community or communicative environment;
 - understanding the basic principles of assessment and/or intervention and having the ability to provide context to the client/family to understand clinical objectives and professional terminology;
 - understanding professional ethics, client–patient confidentiality, and the need to limit bias; and
 - understanding that different sign languages are used in different countries and regions and that dialectal differences exist.⁴
- Establishing collaborative relationships with interpreters, transliterators, and translators to maximize the effectiveness of services.

- Maintaining appropriate professional relationships among the clinician, the student/family, and the interpreter, transliterator, or translator.
- Seeking information on the features and developmental characteristics, when available, of the language(s) and/or dialect(s) that are spoken or signed by the student/family.
- Obtaining information on the student's/family's significant cultural and linguistic influences, when possible.
- Understanding the standardization process for assessments and how collaboration with an interpreter, transliterator, or translator may influence or possibly invalidate standard scores.
- Educating the interpreter, transliterator, or translator regarding the goals and intent of the session.⁵

ASHA recommends the OELA consider the above-mentioned requirements set forth for audiologists and SLPs to ensure access to interpreting services to support the client-provider engagement. For further consideration, ASHA has developed a range of resources on the role of audiologists and SLPs in this context.^{6,7,8,9,10,11,12}

Thank you for your willingness to engage with a range of stakeholders in “compiling this information and furthering the conversation regarding interpreters and translators to help support all students to succeed academically.” Audiologists and SLPs play a key role in ensuring student success social-emotionally, functionally, and academically. Collaboration with interpreters and translators is critical for linguistically appropriate and culturally responsive services to multilingual populations. We look forward to working together to be part of the solution in addressing these challenges and would welcome the opportunity to connect and continue to work with OELA regarding these issues and the unique and vital role audiologists and SLPs can provide in supporting OELA’s mission.

We appreciate the opportunity to lend our members’ expertise to help further inform this process. If you or your staff have any questions, please contact Bill Knudsen, ASHA's director of education policy, at bknudsen@asha.org.

Sincerely,



Robert M. Augustine, PhD, CCC-SLP
2023 ASHA President

¹ American Speech-Language-Hearing Association. (2022). Annual Demographic & Employment Data. 2022 Member and Affiliate Profile. <https://www.asha.org/siteassets/surveys/2022-member-affiliate-profile.pdf>.

² American Speech-Language-Hearing Association. (2017). Issues in Ethics: Cultural and Linguistic Competence. <https://www.asha.org/practice/ethics/cultural-and-linguistic-competence/>.

³ American Speech-Language-Hearing Association. (n.d.). *Bilingual Service Delivery* (Practice Portal). <https://www.asha.org/practice-portal/professional-issues/bilingual-service-delivery>

⁴ National Institute on Deafness and Other Communication Disorders. (n.d.). American Sign Language. <https://www.nidcd.nih.gov/health/american-sign-language>.

⁵ American Speech-Language-Hearing Association. (n.d.). *Collaborating with Interpreters, Transliterators, and Translators*. (Practice Portal). <https://www.asha.org/practice-portal/professional-issues/collaborating-with-interpreters/>.

⁶ Saenz, T.I. & Langdon, H.W. (2021). Speech-Language Pathologist's Experiences with Interpreters in the School Setting: A Preliminary Study. *Perspectives on Cultural and Linguistic Diversity*. https://pubs.asha.org/doi/epdf/10.1044/2021_PERSP-20-00166.

⁷ Langdon, H.W. & Saenz, T.I. (2016). Working With Interpreters to Support Students Who Are English Language Learners. *Perspectives on School-Based Issues*. <https://pubs.asha.org/doi/10.1044/persp1.SIG16.15>.

⁸ Pretto, A. (2012). Integrating and Interpreter. *The ASHA Leader*.
<https://leader.pubs.asha.org/doi/10.1044/leader.SIGN.17092012.40>.

⁹ Ibid.

¹⁰ Chabon, S., Brown, J.E., & Gildersleeve-Neumann, C. (2010). Ethics, Equity, and English-Language Learners: A Decision-Making Framework. *The ASHA Leader*. <https://leader.pubs.asha.org/doi/10.1044/leader.FTR1.15092010.10>.

¹¹ Crowley, C.J. (2004). The Ethics of Assessment With Culturally and Linguistically Diverse Populations. *The ASHA Leader*.
<https://leader.pubs.asha.org/doi/10.1044/leader.FTR5.09052004.6>.

¹² Green, K.J., (2022). Ways to Incorporate Interpreters as Interprofessional Partners. *ASHA Leader Live*.
<https://leader.pubs.asha.org/doi/10.1044/leader.SCM.27072022.IPP-interpreters.30/full/>.