

February 23, 2019

The Honorable Frank Brogan
Assistant Secretary
Office of Elementary and Secondary Education
400 Maryland Ave., SW
Washington, DC 20202

Dear Assistant Secretary Brogan:

The American Speech-Language-Hearing Association appreciates the opportunity to comment on the U.S. Department of Education's **non-regulatory informational document on Supplement Not Supplant** under Title 1, Part A of the Elementary and Secondary Education Act (ESEA), as amended in the Every Student Succeeds Act (ESSA)—supplement not supplant requirement of Title I.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 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. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, including swallowing disorders. Over half of ASHA's members work in a school setting as part of the education team.

ASHA members provide important and valuable services to help students access the general curriculum and can be instrumental in designing learning systems. Audiologists and SLPs support students, families, and staff from early education through graduation in the context of both general and special education. Therefore, audiologists, SLPs, and other specialized instructional support personnel (SISP) are concerned about the benefits of supplementary federal funding to Title I and other schools, and the flexibility that states and districts need to fully integrate ASHA members into the education team.

ASHA supports the concept of supplement—not supplant—and underscores that students who live in poverty and/or with disabilities may require significant supports and services to reach their full potential. Overall, there appears to be inconsistent messages within the informational document and too many loopholes for state and local education agencies to opt-out of requirements. This thereby renders the guidance ineffectual by not providing the accountability and transparency needed to ensure the ESSA Title 1 goal “to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps” is met.

We request that the Department encourage states and districts to use these funds for supplementary resources and to increase services that would assist children with gaining access to the general curriculum. In addition, Title I funds should be explicitly allowed for the professional development of SISP.

Although ASHA appreciates the request for comments on the informational document, we urge the Department to consider rulemaking in this area through the formal notice of proposed rulemaking process or an advance notice of such rulemaking. This will promote stakeholder engagement on specific proposals and formal opportunities to provide comments ensuring transparency for the public.

We submit the following comments and recommendations in response to the informational document:

1. Promote the Engagement of SISP in Multi-Tiered Systems of Support (MTSS) for Struggling Learners

Recommendation

Include SISP in MTSS and issue guidance to clarify what the appropriate uses are for Title I funds for MTSS and SISP.

Rationale

Supporting struggling learners through problem-solving approaches, like MTSS, has been effective in helping to reduce the reliance on special education services. Unfortunately, states and districts do not have clear guidance on the appropriate use of federal funds for these programs and the importance of utilizing an effective team, including qualified SISP, to help students succeed in general education. We understand that some school districts exclude SISP from MTSS; therefore, denying students access to their expertise within the general education setting.

2. Allocation and Reporting of Funds

Recommendation

Support the consistent and stable allocation of funding and other resources, specifically for SISP services. The Department should encourage a reporting structure that delineates how all federal, state, and local funds will be used by states, districts, and individual schools.

Rationale

Increased transparency will enhance accountability to the public by schools and districts, showing how they are utilizing Title I funds effectively to support struggling learners. By requiring districts to publicly disclose its funding allocations, it will discourage supplanting federal funding meant for high needs schools.

3. Interprofessional Education/Interprofessional Practice (IPE/IPP)

Recommendation

Encourage the equitable distribution of resources so that all school-based professionals can benefit from collective professional education, training, and experiences of their colleagues.

Rationale

The principles of Interprofessional Education (IPE) and Interprofessional Practice (IPP) encourage professionals learning about, from, and with one another to enhance outcomes, reduce duplication and costs, and improve safety and quality of services. IPP fosters effective collaboration and has the potential to improve outcomes and quality of care. Within K–12 settings, problem solving approaches in education policy—such as (a) Response to Intervention (RTI) or other MTSS and (b) state education standards—is driving the need for interprofessional

collaborations. Such education approaches are best achieved when all professionals integrate their services, communicate, evaluate, and train together to support student success. Ensuring that all school-based professionals have access to professional development and training is vital to this effort.

Dr. Grover Whitehurst, former assistant secretary for Educational Research and Improvement, ED, described best practices in education as, “the integration of professional wisdom with the best available empirical evidence in making decisions about how to deliver instruction,” which is the heart of evidence-based practice.ⁱ Such an integration of professional wisdom would be difficult to achieve without the possibilities for educators across disciplines to learn from one another and work together with families. For example, an interprofessional approach ensures an ability to create an agreed upon educational plan in circumstances where the evidence may be lacking, but the full complement of professionals can use their collective knowledge to support an individual child’s needs while searching for empirical evidence and/or contribute their own evidence.

4. Stakeholder Engagement and Transparency

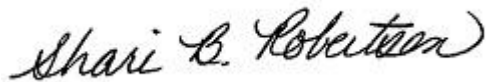
Comments

As informational guidance documents do not carry the weight of regulations, the Department should consider rulemaking in this area through the formal notice of proposed rulemaking process or even an advance notice of such rulemaking to appropriately engage stakeholders on this important issue.

ASHA looks forward to working with the Department on this important issue in order to ensure that the needs of all students are met with the appropriate and equitable allocation of resources so that all students can achieve their full potential.

Thank you for the opportunity to provide these comments. If you or your staff have any questions, please contact Catherine D. Clarke, ASHA's director of education policy, at 301-296-8765 or by email at cclarke@asha.org.

Sincerely,



Shari B. Robertson, PhD, CCC-SLP
2019 ASHA President

ⁱ The United States Department of Education. (n.d.). *Archived Information. Evidence-Based Education (EBE)* Retrieved from <https://www2.ed.gov/nclb/methods/whatworks/eb/evidencebased.ppt>.