



ASHA
American
Speech-Language-Hearing
Association

October 28, 2019

The Honorable Bobby Scott
Chairman
Committee on Education and Labor
U.S. House of Representatives
2176 Rayburn House Office Building
Washington, DC 20515

The Honorable Virginia Foxx
Ranking Member
Committee on Education and Labor
U.S. House of Representatives
2101 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Scott and Ranking Member Foxx:

On behalf of the American Speech-Language-Hearing Association, I write to share our views on the College Affordability Act (H.R. 4674) and its support for students studying communications sciences and disorders to become audiologists and speech-language pathologists. We are pleased to see improvements to access to and affordability to higher education for students but are concerned with certain changes that may burden programmatic accrediting agencies in a way that may lead to additional costs that could be passed on to students.

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.

Access and Affordability

ASHA applauds efforts in H.R. 4674 to improve access to higher education and ensure that students are able to afford undergraduate and graduate education through provisions to improve access and affordability including:

- expanding the Title II definition of teacher to include specialized instructional support personnel;
- increasing the maximum Pell Grant award, and allowing students to carry remaining Pell Grant eligibility into post-baccalaureate studies;
- increasing access to affordable federal loan programs for graduate students;
- requiring colleges to accept a student's formal documentation of disability from high school;
- retaining and expanding loan forgiveness programs including the Public Service Loan Forgiveness Program;
- streamlining the Free Application for Federal Student Aid process; and
- simplifying federal loan repayment processes and strengthening student protections.

Accreditation and Accountability

ASHA maintains that it is critical to maintain 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. ASHA appreciates that H.R.4674 continues to maintain the process for recognition of programmatic accreditors since state licensure laws and national certification examinations are tied to graduating from accredited programs.

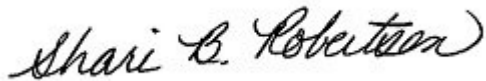
Changes in H.R. 4674 requiring new reporting on student achievement outcomes are problematic and would place increased administrative burden on programmatic accreditors, which would be burdensome to non-Title IV fund gatekeepers. Programmatic accreditors are concerned with the ability to obtain valid, high-quality data on achievement outcomes. ASHA maintains that those responsibilities should remain with institutions or Title IV gatekeepers.

In addition, ASHA is concerned that the Evaluation of Quality and Achievement Measures may not recognize the distinct role that programmatic accreditors play in comparison to institutional Title IV gatekeepers. We recognize the need for ensuring effective accreditor oversight of institutions but oppose provisions in H.R. 4674 that establish the Technical Review Panel process, require comparison of performance benchmarks between accreditors, and grant the Secretary authority to require revision of performance benchmarks.

If these provisions are retained, ASHA encourages the Committee to revise these provisions to ensure flexibility in determining measures to establish and assess benchmarks, as well as their process for enforcement. This is vital for programmatic accreditors.

Thank you for the opportunity to express ASHA's view on H.R. 4674. ASHA looks forward to working with you as this bill moves through the House to support improved access and affordability for students, while removing or revising certain provisions to continue the unique roles and expertise of programmatic accreditors. If you or your staff have any questions, please contact Eric Masten, ASHA's director of federal affairs, education, at emasten@asha.org.

Sincerely,

A handwritten signature in cursive script that reads "Shari B. Robertson".

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