



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

Submitted via e-mail to: Steve.Abrams@senate.ks.gov

March 3, 2016

Kansas State Capitol Room 224-E
300 SW 10th St.
Topeka, KS 66612

RE: S.B. 444

Dear Chairman Abrams and Members of the Senate Education Committee:

On behalf of ASHA members, I am writing to oppose Senate Bill 444, which would establish a language development assessment program to be administered by the Kansas Commission on Deaf and Hard of Hearing (KCDHH) through the establishment of an advisory committee consisting of teachers of the deaf, parents, groups supporting American Sign Language (ASL), and state agencies.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 186,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 1,700 of our members reside in Kansas.

Role of the Individual Education Program Team

Federal education law requires schools to administer a comprehensive assessment to students suspected of having a disability. The assessment team must include qualified providers that are trained to assess the full range of the suspected disability, including communication disorders. An Individual Education Program (IEP) team consisting of qualified providers and parents then meet to develop an individualized program to address the student's needs. Allowing a state committee to establish language assessments for students who are deaf or hard of hearing would usurp the decision making authority of the IEP team, a violation of federal law. Further, the bill requires that the language assessment be completed annually for each child with hearing loss less than nine years of age, which is an unnecessary and costly process for financially strapped school districts and the state. Parents who are dissatisfied with their child's goals or progress on their IEP already have the right under the Individuals with Disabilities Education Act (IDEA) of 2004 to request a complete re-evaluation.

It also appears that the bill supports only one method of communication for students with hearing loss—American Sign Language (ASL). ASL is only one communication method for these students and children and their families have the right under IDEA to choose an appropriate method of communication from the full range of options, not just ASL.

Speech-Language Pathologists: Professionals Trained to Assess and Treat Speech and Language Disorders

Allowing a state commission to develop language assessments for IEP teams, negates the role of a highly trained communication specialist—the speech-language pathologist. Speech-language pathologists (SLPs) are uniquely educated and trained to assess and treat children and adults with speech, language, hearing, swallowing, and cognitive communication disorders. These services help children acquire language and enable individuals to recover essential skills to communicate about

their health and safety, to safely swallow adequate nutrition, and to have sufficient attention, memory, and organizational skills to function in their environments.

SLPs complete a comprehensive education program that meets rigorous standards of practice based on objective methodology, which includes the following:

- A master's or doctoral degree with **75 semester credit hours in a course of study addressing the knowledge and skills pertinent to the field of speech-language pathology, as determined, validated, and systematically updated using a skills validation process.**
- A minimum of 400 clock hours of supervised clinical experience in the practice of speech-language pathology, with the supervision provided by individuals holding the ASHA Certificate of Clinical Competence (CCC).
- A passing score, determined by a cut score analysis, on a national examination administered and validated by the Educational Testing Service.
- Completion of a supervised Clinical Fellowship to meet the requirements of the CCC, the recognized standard in the field.
- State licensure (SLPs are regulated in all 50 states and the District of Columbia).
- Completion of 30 hours of professional development activities every 3 years.

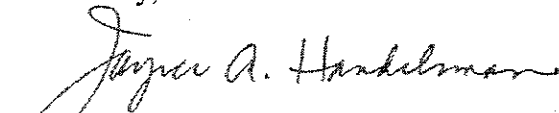
SLPs are highly skilled professionals who are uniquely qualified to assess and treat children with hearing loss that present with speech, language, communication or cognitive problems. Rather than developing a costly overly burdensome system for treating children with hearing loss, we recommend that the state:

- encourage collaboration among state agencies to develop guidance for professionals treating students with hearing loss, including mentoring and professional development programs;
- explore other service delivery options, such as telehealth/telepractice, that would allow students remote access to trained professionals; and
- enforce existing laws so that families have access to a comprehensive evaluation and a full range of communication options.

Given the financial constraints that school systems face and the cost of educating students with disabilities in the state, it seems prudent to utilize the talented professionals, including SLPs, who work with students with hearing loss every day, rather creating costly and redundant systems that violate the tenets of IDEA.

Thank you for the opportunity to submit comments. Should you have any questions or need further information, please contact Janet Deppe, ASHA's director of state advocacy, at jdeppe@asha.org or by phone at 301-296-5668.

Sincerely,



Jayne A. Handelsman, PhD, CCC-A
2016 ASHA President