1925-2025
Legacy. Impact. Possibilities.

September 5, 2025

The Honorable Tim Walberg
Chairman
Committee on Education & Workforce
U.S. House of Representatives
2176 Rayburn House Office Building
Washington, DC 20515

The Honorable Bobby Scott
Ranking Member
Committee on Education & Workforce
U.S. House of Representatives
2101 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Walberg and Ranking Member Scott:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to share our views regarding the Accreditation Choice and Innovation Act (H.R. 4054) and its potential impact on the ability of students studying communication sciences and disorders to become audiologists and speech-language pathologists (SLPs).

ASHA is the national professional, scientific, and credentialing association for 241,000 members and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids and implantable hearing devices. SLPs identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders.

ASHA is particularly concerned with the wide-ranging changes to the existing accreditation system that are included in H.R. 4054. As reported by the Education & Workforce Committee, the bill would apply the same requirements for all accrediting agencies, including programmatic accreditors, many of which are not Title IV gatekeepers. ASHA supports maintaining 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.

We are concerned that Sec. 2(a)(4)'s amendments to 20 USC 1099b(a) would increase the administrative burden on programmatic accreditors, resulting in higher accreditation costs for institutions that would be passed on to students. **We specifically recommend that Sec. 2(a)(4)(A)'s language relating to the definition of "separate and independent" instead directly amend the existing definition in 20 USC 1099b(b)**.

As currently drafted, the language of Sec. 2(a)(4) suggests that an accrediting agency could remain under the legal umbrella of a "related, associated, or affiliated trade association or membership organization" under certain conditions. Should this section amend 20 USC 1099b(a), **we recommend that H.R. 4054 be amended to permit accrediting agencies to maintain their recognition with the current "budgetary and administrative autonomy" standards set out in 34 CFR 602**. Additionally, **we recommend adding the underlined language below**:

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> "(III) guidelines are established for such members to avoid conflicts of interest, including specific guidelines to ensure that no such member who is an employee of any institution accredited by the agency or association or has a financial interest in any such institution exercises substantial control over such institution;"

For programmatic accrediting agencies to effectively fulfill their role in ensuring the quality of education for specific programs, it is important that they be able to include individuals on their boards with relevant and recent expertise in the effective instruction of students in a particular course of study.

ASHA notes that Sec. 2(a)(6)'s requirements for reporting on completion rates, retention rates, and loan repayment rates may pose challenges for accrediting agencies to obtain high-quality data from institutions and programs. These three categories of data are also highly subject to variations based on individual student situations and larger economic conditions, which may have little to do with the quality of a program. We support the inclusion of language relating to "standards for consideration of learning outcomes measures (such as competency attainment and licensing examination passage rates)."

Thank you for the opportunity to express ASHA's views on H.R. 4054. ASHA looks forward to working with you to revise this bill to support improved access and affordability for students while ensuring accountability and accreditation measures do not place new requirements on accreditation agencies that could increase the cost of higher education. If you or your staff have any questions, please contact Eric Masten, ASHA's director of federal affairs for education, at emasten@asha.org.

Sincerely,

A. B. Mayfield-Clarke

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2025 ASHA President