

May 27, 2022

The Honorable Miguel Cardona Secretary U.S. Department of Education 400 Maryland Ave., SW Washington, DC 20202

Dear Secretary Cardona:

On behalf of the American Speech-Language-Hearing Association, I write regarding the U.S. Department of Education's (ED) May 13, 2022, letter from Roberto Rodriguez, Assistant Secretary of Planning, Evaluation and Policy Development to Mr. Daniel Domenech, Executive Director of AASA, The School Superintendents Association, regarding spending flexibility under the American Rescue Plan's Elementary and Secondary School Emergency Relief (ARP ESSER) Fund.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 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, language, and swallowing disorders.

More than half of ASHA members work in educational settings. The services provided by ASHA members help ensure that all children, particularly children with disabilities, develop effective cognitive-communication skills, acquire language bases that support reading and literacy skills, and achieve successful learning outcomes while receiving a free appropriate public education (FAPE) in the least restrictive environment.

ASHA strongly supports efforts to ensure appropriate workspaces and environments are conducive to high-quality service delivery and student privacy for educational audiologists and school-based speech-language pathologists (SLPs). ASHA's 2020 Schools Survey found that over one third of educational audiologists (37.9%) and nearly one third of school-based SLPs (29.9%) identified inadequate workspace and facilities as a challenge to their work.^{1,2}

Infrastructure projects funded by ARP ESSER funds can help schools ensure that students and educators, including audiologists and SLPs, have access to an appropriate, safe, and healthy education environment that ensures student access and high-quality service delivery in a suitable physical space to learn and work. This includes upgrading/replacing heating, ventilation, and air conditioning (HVAC) systems, as well as renovation or construction projects that provide sufficient physical space for service delivery.

For state and local education agencies (SEAs and LEAs) to ensure that students can continue receiving FAPE in a safe environment, ARP ESSER funds are utilized to address school infrastructure needs that protect the health and safety of students and educators. However, challenges persist in addressing projects that have been identified by SEAs and LEAs. ASHA encourages ED to provide flexibility in utilization of ARP ESSER funds to address immediate

needs, including addressing disrupted instruction and services. ASHA also encourages ED to approve grant extension requests consistent with statutory requirements for appropriate renovation and construction projects that meet the goals of ensuring a healthy physical learning environment and expand the period to liquidate ARP ESSER funds for the purposes outlined in this letter.

ASHA appreciates ED's continued encouragement to SEAs and LEAs to utilize ARP ESSER funds to address personnel shortages through efforts to recruit and retain educators, including audiologists, SLPs, and other specialized instructional support personnel (SISP). In addition to immediate hiring efforts and long-term recruitment strategies, we encourage ED to promote efforts by SEAs and LEAs to utilize ARP (and other) ESSER funds to hire temporary/short-term personnel to address immediate administrative needs, allowing educators and SISP to address lost time for learning and related services.

If you or your staff have any questions, please contact Eric Masten, ASHA's director of federal affairs, education, at emasten@asha.org.

Sincerely,

(Judy Rich, EdD, CCC-SLP, BCS-CL

2022 ASHA President

¹ American Speech-Language-Hearing Association. (2020). 2020 Schools survey. *Survey summary report: Numbers and types of responses, SLPs.* <u>www.asha.org</u>.

² American Speech-Language-Hearing Association. (2020). 2020 Schools survey. *Survey summary report: Numbers and types of responses, educational audiologists.* www.asha.org.