

April 10, 2023

The Honorable Dr. Nasser H. Paydar
Assistant Secretary for Postsecondary Education
U.S. Department of Education
400 Maryland Avenue
Washington, DC 20202

Dear Assistant Secretary Paydar:

On behalf of the Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA), I write to comment on the Department's "intention to establish one or more negotiated rulemaking committee(s)...to prepare proposed regulations for the Federal Student Aid programs authorized under title IV of the Higher Education Act of 1965, as amended (HEA)." We welcome the opportunity to fully participate in this process, provide public testimony, and share feedback on the suggested topics the Department may consider.

The Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA) of the American Speech-Language-Hearing Association (ASHA) offers voluntary programmatic accreditation to graduate degree programs in audiology and in speech-language pathology housed within accredited institutions of higher education. The CAA is the entity within ASHA that has the authority to establish and enforce a set of standards for the accreditation of graduate education programs in audiology and in speech-language pathology, and to make accreditation decisions. The CAA is recognized by the Council for Higher Education Accreditation and the Secretary of the U.S. Department of Education as a programmatic accrediting agency for graduate programs in audiology and speech-language pathology programs.

At this time, we would like to highlight the importance of three issues for the professions of audiology and speech-language pathology and those we serve.

1. Eligibility requirements for programmatic accreditors
2. Compliance and reporting requirements
3. Importance of telepractice


The Secretary's role in recognizing "accrediting agencies in 34 CFR part 602 and related parts" is imperative. We request that the Department consider maintaining current eligibility requirements for programmatic accreditors without significant changes to administrative and fiscal structural requirements that may increase accreditation costs and unintentionally harm students financially. Current requirements recognize the unique role programmatic accreditors play in ensuring educational programs produce qualified and competent practitioners. This may include requirements for "third-party servicers and related issues, such as reporting, financial responsibility, compliance, and past performance requirements as a component of institutional eligibility for participation in the title IV, HEA Federal student financial assistance programs under 34 CFR 668.25 and 682.416." The CAA requests clarity on who falls under the definition of third-party servicer and what reporting and auditing activities they would be subject to. Additionally, the CAA requests clarification on the role that would then be played by the programmatic accreditor, and what reporting and auditing activities the programmatic accreditor would be subject to.

It is critical to maintain current eligibility and reporting requirements while allowing the Department to monitor and sanction those accreditors that fail to comply with recognition criteria. Any new reporting on contractual arrangements with third party servicers would place an 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. CAA maintains that those responsibilities should remain with institutions or Title IV gatekeepers. Fifteen of the nationally recognized programmatic and specialized accrediting agencies are not Title IV gatekeepers and are not required to monitor Title IV activities because that responsibility is conducted at the institutional level.¹

Regarding the “definition of “distance education” under 34 CFR 600.2 as it pertains to clock hour programs and reporting for students who enroll primarily online,” we would like to highlight the importance of telepractice and ensuring any changes do not negatively impact the provision of these services. Telepractice is an appropriate model of service delivery for audiologists and speech-language pathologists and may be the primary mode of service delivery or may supplement in-person services. Telepractice services may be provided by contractors with a school district or by audiologists and speech-language pathologists employed by the district. The strategic use of telepractice addresses personnel shortages in some school districts, increases flexibility to meet workload demands by reducing travel to multiple schools, and improves accessibility to providers. Telepractice affords a more accessible and preferred format of service delivery for some students receiving direct services and assessments as well as for collaborating with staff and families who are receiving consultative services.^{2, 3} Because of the important implications for telepractice services of any emerging redefinition of distance education, CAA will be closely monitoring this aspect of the negotiated rule making process.

Thank you for your willingness to engage with a range of stakeholders who may be impacted by these regulations. We look forward to being a vibrant part of the rulemaking process and appreciate the opportunity to lend our members’ expertise to help further inform the Department’s work. If you or your staff have any questions, please contact Gretchen Ehret Hoshaw, ASHA’s chief accreditation officer, at gehret@asha.org.

Sincerely,



Mary Sue Fino-Szumski, PhD, MBA, CCC-A
2023 Chair, Council on Academic Accreditation in Audiology and Speech-Language Pathology

¹ U.S. Department of Education. (n.d.). *Accreditation in the United States; Nationally Recognized Accrediting Agencies*. https://www2.ed.gov/admins/finaid/accred/accreditation_pg5.html.

² Boisvert, M. K., & Hall, N. (2019). Telepractice for school-based speech and language services: A workload management strategy. *Perspectives of the ASHA Special Interest Groups*, 4(1), 211–216. https://doi.org/10.1044/2018_PERS-SIG18-2018-0004.

³ Grogan-Johnson, S. (2021). The five W’s meet the three R’s: The who, what, when, where, and why of telepractice service delivery for school-based speech-language therapy services. *Seminars in Speech and Language*, 42(02), 162–176. <https://doi.org/10.1055/s-0041-1723842>.