



January 27, 2022

Nancy Bargmann, Director
Department of Developmental Services Legislation
Regulations and Public Affairs
1215 O Street, MS 9-10
Sacramento, CA 95814

RE: ASHA Comments on Early Intervention Amendments

Dear Ms. Bargmann:

On behalf of the American Speech-Language-Hearing Association, I write to support the proposed amendments aligning California's early intervention requirements with Part C of the federal Individuals with Disabilities Education Act (IDEA).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 15,000 ASHA members reside in California.¹

ASHA supports maintaining the \$54 million that California receives annually to fund early intervention services for eligible infants, toddlers, and their families who are in the Early Start program. Audiologists and speech-language pathologists (SLPs) are key participants in early intervention teams. They assist children in developing critical skill sets including:

- cognitive skills (thinking, learning, problem-solving);
- communication skills (gesturing, talking, listening, understanding);
- physical and sensory skills (crawling, walking, climbing, seeing, hearing);
- social-emotional skills (playing, understanding feelings, making friends); and
- adaptive or self-help skills (eating, bathing, dressing).

ASHA supports defining "assistive technology service" to ensure appropriate services are provided to all infants and toddlers acquiring an assistive technology device and includes the purchasing, leasing, or otherwise providing for the acquisition of assistive technology devices as well as selecting, designing, fitting, customizing, adapting, applying, maintaining, repairing, or replacing as specified in the requirements of Part C of IDEA.² ASHA also supports defining "consent" to ensure that parents understand that their consent may be revoked at any time and further defining "health services" so it is made clear that these include consultation services by physicians with other service providers, including audiologists and SLPs, regarding the health care concerns of infants and toddlers with disabilities.

January 27, 2022
Page 2

Thank you for your consideration of ASHA's position to support the proposed early intervention regulatory changes. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,



Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President

¹ American Speech-Language-Hearing Association. (2020). *California* [Quick Facts].
<https://www.asha.org/siteassets/uploadedfiles/California-State-Flyer.pdf>.

² Authenticated U.S. Government Information. (2004). *Individual With Disabilities Education Act, Public Law 108-446, 2004*. <https://www.congress.gov/108/plaws/publ446/PLAW-108publ446.pdf>.