



California Speech Language Hearing Association

January 30, 2022

Nancy Bargmann, Director
Department of Developmental Services
Legislation, Regulations and Public Affairs
1215 O Street, M.S. 9–10
Sacramento, CA 95814

RE: *California Speech Language Hearing Association (CHSA) comments on Early Intervention Amendments*

Dear Director Bargmann:

I write on behalf of the California Speech Language Hearing Association (CSHA), to provide comments in support of the proposed amendments to regulations for California's Early Start program which provides early intervention services to infants and toddlers, to align with Part C of the federal Individuals with Disabilities Education Act ("Part C").

The California Speech Language Hearing Association (CSHA) is a statewide association that represents approximately 3,000 speech language pathologists (SLPs), speech language pathologist assistants (SLPAs), audiologists, students and other related professionals who are working in diverse environments in California. CSHA members provide critical evidence-based services and supports to students with exceptional needs, including those from diverse populations in California's public and private school settings. These services and supports build functional and meaningful communication skills and facilitate academic achievement. In the health care setting, CSHA members provide medically necessary services that result in positive health outcomes and an enhanced quality of life.

CSHA strongly supports early intervention services for eligible infants and toddlers with developmental delays or who have conditions likely to lead to developmental delays or disabilities. The intent of Part C is to build interagency partnerships among state agencies and programs in health, education, and human services. Speech language pathologists (SLPs) and audiologists are essential providers in the Early Intervention program and deliver critical early intervention services in the areas of communication skills, cognitive skills development, sensory & monitor development, and social emotional learning. The program works to strengthen, support, and empower families of culturally and linguistically diverse backgrounds to understand, enhance and reinforce necessary skills to promote their child's development.

CSHA is providing specific comments in support of the proposed changes to Title 17, CCR, Sections 52000 and 52082 related to the topics of assistive technology service, consent, and procedures for determining eligibility:

Section 52000 - Definitions

52000 (b)(6) Assistive Technology Service – Expanding the definition of assistive technology services in section 52000 is vital to ensure that appropriate services be provided to an infant or toddler being evaluated for, acquiring, or receiving training/technical assistance regarding an assistive technology device. This expansion assures that the family understands the equipment and services that will be used to help meet the student’s immediate needs.

Section 52000 (b)(13) Parental Consent – Parents and families are critical partners in the early intervention delivery system. The intervention services provided during sessions must also be provided in the home setting by parent and family members in order to make sustainable progress. Defining parental consent is crucial so that the parent understands and agrees to what services will be provided, who the service providers are, and reassures the parent that their consent is voluntary and revocable at any time if service needs changes.

Section 52082 – Procedures for Evaluation to Determine Eligibility

The determination of eligibility for an infant or toddler in the Early Intervention program is made by qualified personnel of the regional center or Local Education Agency (LEA) which includes the participation of a multidisciplinary team. SLPs & audiologists are part of multidisciplinary teams. CSHA supports the expansion of the procedures used for eligibility determination to include the use of 1) educational or other early intervention records, and 2) gathering information from other sources such as family members, other caregivers, medical providers, social workers, and educators as necessary to understand the full scope of the infant’s or toddler’s unique strengths and needs.

CSHA believes that the expansion of eligibility determination factors for the Early Intervention program will allow regional centers and LEAs to work closely with family members and other critical providers who have intimate knowledge of the child's strengths, struggles, and development which can lead to a timelier process to assess needs and begin services.

Thank you for your consideration of CSHA’s comments on the proposed amendments to the state regulations for Early Intervention Services. If we can be of further assistance, please contact me via email at brianl@csha.org, or at 916-995-5021.

Sincerely,

Brian Lewis

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