



March 3, 2019

Shari B. Robertson, CCC-SLP  
President, Board of Directors  
American Speech-Language-Hearing Association (ASHA)  
National Office  
2200 Research Boulevard  
Rockville, MD 20850-3289

Dear Dr. Robertson:

The National Association of the Deaf (NAD) sends this letter to you and the American Speech-Language-Hearing Association (ASHA) in response to your open call for comments on the proposed position statement prepared by your Ad Hoc Committee to Develop a Position Statement that American Sign Language is a Distinct Natural Language. While we agree with ASHA that deaf and hard of hearing children who need ASL services should receive such services with adequate funding including through the English Learner (EL) program of the Elementary and Secondary Education Act (ESEA), the framing of this invitation for comments has triggered concern from members of the deaf and hard of hearing community.

First, we would like to address the primary aim of the position statement: to promote consistent federal recognition of ASL as a distinct natural language. We appreciate ASHA's efforts to correct discrepancies among federal agencies and provide an accurate history on ASL. For additional framing and references, please see the NAD's position statement on ASL.<sup>1</sup>

However, the way ASHA worded its invitation for comments on this issue caused significant concern in the deaf and hard of hearing community that the long-established premise of ASL being a legitimate language was now in question. As a result, we had to reframe the issue to generate the necessary support for this initiative. Such reframing was particularly necessary given ASHA's recent statements opposing LEAD-K, which is inconsistent with this effort to promote ASL on behalf of deaf and hard of hearing children.

For several years now, the NAD has been involved in efforts to get ASL listed as a language eligible for EL funding. We worked with the Linguistics Society of America and the American Educational Research Association, along with others, to address this issue by meeting with key people at both the U.S. Department of Education and the U.S. Department of Justice (with their Educational Equity office).

As educators and service providers become more aware of the benefits of EL for students using ASL, it is critical that we set appropriate expectations for how services will be implemented should we succeed in securing EL funding.

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<sup>1</sup><https://www.nad.org/about-us/position-statements/position-statement-on-american-sign-language/>



This brings us to another key concern we have, with this sentence from the proposed position statement, “Audiologists and speech-language pathologists who are proficient in ASL provide direct assessment and intervention for ASL users to ensure a strong language foundation for future learning.” The NAD respectfully asserts that any such proficiency must be examined and measured to reflect mastery to the extent that the professional is able to properly and fully complete assessment of a student’s language.

As a result, anyone who conducts ASL assessments must be fluent in ASL, as measured by a high score on the American Sign Language Proficiency Interview (ASLPI), the most reliable mechanism that exists to measure ASL proficiency at the present time. They also should be trained on the specific ASL assessments, including using those that are normed and designed specifically for deaf and hard of hearing students.

The NAD additionally takes the position that any person who is not fluent in ASL should never perform ASL assessments, including any attempt to do so through the use of interpreters. Sign language interpreters do not receive any type of training or education to perform language assessments, and should not be used by non-fluent individuals to assess any student’s ASL skills.

In fact, the Individuals with Disabilities Education Act (IDEA) has provisions that bar such an inappropriate use of sign language interpreters. The IDEA lists special factors with respect to direct communication between the deaf or hard of hearing student and the teacher/professional, in this case the assessor. [34 CFR §300.324(a)(2)(iv)].

The NAD strongly recommends that ASHA members, when doing ASL assessments, collaborate with professionals who are themselves deaf or hard of hearing and at a minimum meet the qualifications listed above. Professional organizations and events focused on ASL professionals have been rapidly growing in recent years in order to address this need, and the existence of those organizations and events are further evidence that ASL deserves to be eligible for EL funding.

Such organizations and events include the American Sign Language Teachers Association, ASL Roundtable, National ASL Education of Heritage Language Learners, and the National ASL & English Bilingual Consortium for Early Childhood Education (NASLECE).

The NAD and the aforementioned organizations bring significant expertise in this area. We urge ASHA to engage in dialogue with the NAD to ensure that all deaf and hard of hearing children receive the appropriate assessments and language-based services that they deserve and need to achieve their full potential.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Draganac-Hawk'. The signature is fluid and cursive.

Melissa Draganac-Hawk  
President

A handwritten signature in black ink, appearing to read 'Howard A. Rosenblum'. The signature is fluid and cursive.

Howard A. Rosenblum  
Chief Executive Officer