

The Department has examined the comments on the proposed survey submitted by the American Speech-Language-Hearing Association (ASHA). The Department acknowledges the important role that pupil services personnel (PSP) play in schools and the role that local educational agencies (LEAs) and State educational agencies (SEAs) play in supporting PSP. However, because of the nature of this particular survey, which is focused only on the small portion of Title II, Part A funds that remain with the SEA to provide State-level activities, we cannot add questions to this survey to address how LEAs use Title II, Part A program funds to serve or support PSP. SEAs will not have this information, and we do not want to create substantial burden on SEAs by having them collect this information from LEAs. LEA uses of funds are addressed by another Department survey, which has been in use for several years.

In terms of the funds that remain with the SEA, which is the focus of the proposed survey, there are only two allowable uses of SEA funds that permit SEAs to make expenditures on PSP. Both of these potential uses of funds are already addressed in the first question on the proposed survey. That question lists all the allowable uses of the SEA activity found in the authorizing statute. Those two uses that PSP are

- Developing and implementing effective mechanisms for helping LEAs and schools to recruit and retain highly qualified teachers, principals, and pupil services personnel
- Providing professional development for teachers and principals (and for pupil services personnel when the SEA determines their participation to be appropriate)

If an SEA is using any of its limited SEA activity money on support for PSP, those expenditures will show up in question 1 under one of the above uses, although such spending would not be broken out from similar spending on teachers and principals. Adding additional questions to the survey to break out specific expenditures on PSP would add significantly to the burden on SEAs in completing the survey and would likely decrease the response rate on the survey as a result.

We agree that the questions that ASHA would like answered through a survey are important ones, and while this survey is not an appropriate place to ask those questions, the Department does offer funding to organizations such as ASHA to collect such information. ASAH could, for example, contact Dr. Emily Doolittle, a research analyst at the the Institute of Education Sciences, who can provide guidance on seeking funds to conduct such a survey.