

July 16, 2018

Board of Directors  
American Speech-Language-Hearing Association (ASHA)  
2200 Research Boulevard  
Rockville, MD 20850-3289

To the ASHA Board of Directors,

We write to respectfully urge you to **withdraw two proposed position statements** that recommend against the further use of methodologies designed to teach individuals with speech-related disabilities how to communicate using letterboards and keyboards.<sup>1</sup> Our request is grounded in the following concerns:

**First, practitioners who follow the proposed recommendations risk being found in violation of the Americans with Disabilities Act (ADA).** ADA regulations mandate that public entities, including schools, support an individual's preferred means of communication except in extenuating circumstances. 28 C.F.R. § 35.160. The statements, if finalized, would put ASHA members and their employers in the awkward and untenable position of deciding whether to comply with federal law or with the contrary guidance of a nonprofit credentialing organization.

**Second, the proposed recommendations are grounded dubiously on the absence of quantitative evidence.** Any ASHA decision that could result in the denial of access to communication for hundreds if not thousands of individuals with disabilities and thus an infringement of their civil rights ought to be subject to an extraordinary burden of proof. Pointing out a need for additional research may be appropriate, but recommending that all practice cease in the meantime is not.

**Third, the premise underlying the proposed statements—that the individuals using these methods are not capable of the complex thoughts they express—is unfounded and discriminatory.** This echoes historical attitudes that neglected the capabilities of other populations with communication disabilities, including those who are Blind, Deaf, Deaf-Blind, or have physical disabilities affecting speech.

**Finally, the process of developing the proposed statements lacked transparency and a diversity of inputs.** Our understanding is that the committee refused to allow any user or professional (including ASHA members) with experience in either methodology to participate in or provide input into the committee's year-long review process of developing the proposals.

If ASHA decides to finalize and place its imprimatur on the position statements, the consequences will almost certainly lead to civil rights violations. ASHA's reputation as a credible and mainstream credentialing organization that supports the rights of individuals with

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<sup>1</sup> <https://www.asha.org/peer-review/Proposed-ASHA-Position-Statement-Rapid-Prompting-Method/>; <https://www.asha.org/peer-review/Proposed-ASHA-Position-Statement-Facilitated-Communication/>

disabilities would be threatened. Given the stakes, **we urge you to withdraw the proposed position statements from further consideration.**

Sincerely,

Alliance for Citizen Directed Supports  
The Arc of the United States  
Autism and Communication Center  
Autism National Committee  
Autistic Self Advocacy Network  
Autistic Women & Nonbinary Network  
Burton Blatt Institute  
Center for Public Representation  
Council of Parent Attorneys and Advocates  
Foundations for Divergent Minds  
Gamaliel Network  
Inclusion International  
Institute on Communication and Inclusion  
National Disability Rights Network  
Nonspeaking Community Consortium  
Ollibean  
PEAK Parent Center  
Quality Trust  
Reid's Gift  
SLP Neurodiversity Collective  
TASH  
Thinking Person's Guide to Autism  
United for Communication Choice