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. 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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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