April 3, 2019

Chairman Scott and Ranking Member Foxx,

On behalf of the National Association of School Psychologists (NASP), thank you for the opportunity to submit comments to be considered during the House Education and Labor Committee’s work on reauthorization of the Higher Education Act. The National Association of School Psychologists represents 25,000 school psychologists who work with students, parents, teachers, administrators, and communities to create safe and supportive school environments that promote student learning, well-being, and safety. School psychologists provide direct support and interventions to students; consult with teachers, families, and personnel to improve support strategies; and work with school administrators to address the academic, social-emotional, and mental and behavioral health needs of all students. NASP supports efforts to help students attain an affordable college and/or graduate degree in a program of study of their choosing. We also support efforts to help colleges and universities recruit and retain students of diverse backgrounds, as well as students who will enter areas where there is a critical shortage. Currently, our nation is experiencing a critical shortage of general and special education teachers, as well as other specialized instructional support personnel, including school psychologists. We believe that improvements must be made to improve affordability of higher education, maintain quality of graduate education, and address the critical shortage in the education workforce. As you work toward reauthorization of the Higher Education Act, we offer these comments for your consideration.

Pathways to Graduate Education and the Workforce

Efforts to encourage more college students to pursue graduate education in areas of critical shortage, including school psychology, will increase access to comprehensive mental health services in schools. NASP recommends a ratio of one school psychologist for every 500-700 students. The estimated national ratio is 1:1381, with some states reporting a ratio as high as 1:4000. In some communities, these high ratios are the result of significant budget cuts, causing districts to cut staff or forego access to school psychologists all together. In other communities, high ratios exist because there simply are not enough qualified personnel to fill existing positions. Current data on school psychologist ratios and estimated student enrollment indicate the need for an additional 63,000 school psychologists to enter the workforce in order to adequately meet the needs of schools and students. This number is only expected to increase as the number of students enrolled in public schools continues to rise.

In many states, the shortage is due to limited availability of graduate education programs and/or difficulty recruiting students due to the rising cost of higher education. Congress can encourage more young people to pursue the profession by creating new and expanding existing pathways to graduate education. These expanded pathways are especially important for students from low-income, disadvantaged backgrounds. The Higher Education Act must include protecting the Public Service Loan Forgiveness Program. Signed into law by President George W. Bush, this program has allowed students to pursue a graduate education in school psychology and serve public schools. Further, reinstating graduate student eligibility for the subsidized federal direct student loans would remove another financial barrier for many students interested in pursuing a career school psychology.
High-needs and rural districts are facing particularly troublesome shortages, often in locations where mental health services in schools are most needed. In these communities, families have great difficulty accessing care due to financial or transportation constraints; school-based services are often the only services available to youth. One avenue that would strengthen mental health access in these communities would be to make school psychologists and other specialized instructional support personnel eligible for federal grants intended to improve recruitment and retention of high-quality educators within these communities (e.g. TEACH grants and Teacher Quality Partnership Grants). Allowing school psychologists and other educators to access this grant, which already requires teachers to serve in high-need fields or a school that services low-income families, would reduce the shortage of school psychologists and expand the availability of comprehensive mental health care to the communities that need it the most. See specific language suggestions below.

**Literacy**
Learning to read is arguably the most important skill that a student will learn in school. Thus, it is absolutely essential that all teachers have the professional development opportunities and resources to provide high quality, comprehensive literacy instruction to students. A number of changes can be made to the Higher Education Opportunity Act of 2008 to support teachers' success.

Our recommendations include adding, aligning or replacing the definitions of terms with those from other education laws, such as:

- Replacing the term “essential components of reading instruction” with the term “comprehensive literacy instruction” from the Every Student Succeeds Act;
- Adding the term “literacy coach” from the Literacy for All Results for the Nation (LEARN) Act;
- Replacing the definition of “Literacy Training” with the definition of “Comprehensive Literacy Instruction” from the Every Student Succeeds Act;
- Replacing the definition of “professional development” with the definition used in the Every Student Succeeds Act;
- Replacing “essential components of reading instruction” and “effective reading instruction” with the term “Comprehensive Literacy Instruction” from the Every Student Succeeds Act.

Additionally, federally funded teacher preparation and development programs must be amended to require teachers to learn to effectively implement comprehensive literacy instruction. These additions to the law will ensure that teachers enter classrooms with effective training in literacy instruction - which will, in turn, decrease unnecessary referrals for special education evaluation and allow school psychologists to provide comprehensive services, including mental and behavioral health services.

**Accreditation**
NASP is a programmatic accreditor, recognized as a Specialized Professional Association by the Council for the Accreditation of Educator Preparation (CAEP). Programmatic accreditation differs from institutional or regional accreditation in its narrower focus on a specific program within a particular field, with attention to field-specific standards and peer review. Such processes provide a critical avenue, as a supplement to regional or institutional accreditation, for professional organizations, such as NASP, to ensure graduate programs meet the standards set forth for the profession. We ask that you consider the needs of programmatic accreditors and professional organizations when discussing policy changes related to accreditation and institutional accountability.

**Suggestions from AIM Higher Act**
Last Congress, Congressional Democrats released their proposal for HEA reauthorization, entitled the Aim Higher Act. We propose incorporating the following definitions and proposals into the work you do this Congress:

- Maintain the definition of educator to mean “a teacher, principal or other school leader, specialized instructional support personnel, or other staff member….”. This term recognizes not only the importance of teachers and school leaders, but also of the other critical personnel who support high quality schools and effective student learning. Retention of this term could open up eligibility for certain federal educator recruitment and retention efforts for all educators, including those in which a critical shortage exists (e.g. school psychologists).

- Maintain language in Sec. 2003. Partnership grants. By expanding the current program to include ‘educators’, high needs districts who are experiencing a shortage of school psychologists and other specialized instructional support personnel would be eligible to use these funds to form partnerships with graduate education programs to create a pipeline and reduce the shortages in high needs schools and districts.

- Maintain language in Sec. 2101, Part B, Subpart 2, Sec. 241,.Well-Rounded Teaching Grants. Today’s teachers must be prepared to educate a diverse student population. In addition, we must provide teachers with the necessary training that allows them to foster a positive classroom and school environment, employ positive discipline strategies, and foster the social emotional learning of their students. Current data indicate that many teachers leave the profession because they do not feel equipped to meet the diverse learning and behavioral needs of their students. Authorization of grants to help strengthen and expand teacher preparation programs that embed social emotional learning competencies and non-exclusionary, positive behavior management practices can help better prepare our teachers, improve student outcomes, improve school climate, and importantly, reduce teacher turnover.

Thank you again for the opportunity to share our comments on potential amendments to the Higher Education Act. If you have any questions, please don’t hesitate to reach out to Kelly Vaillancourt Strobach, NASP Director of Policy and Advocacy (kvaillancourt@naspweb.org).

Sincerely,

Kathleen Minke, PhD, NCSP
Executive Director