Dear President-Elect Biden,

The National Association of School Psychologists (NASP) is pleased to present our vision for public education, *Ready to Learn, Empowered to Teach: Guiding Principles for Effective Schools and Successful Students*, and specific priority recommendations for the Administration and Department of Education. As your administration works toward implementing fiscal and programmatic policies that ensure our public education system helps all of America’s children achieve their fullest potential, we look forward to an ongoing and collaborative relationship with members of your transition team, the Department of Education, and the White House to discuss these recommendations in greater detail and assist with implementation.

Specifically, *Ready to Learn, Empowered to Teach* calls for:

- Reviewing, evaluating, and reconstructing or replacing existing school structures, policies, and procedures that lead to inequitable outcomes.
- Combining high expectations for all students with high-quality instruction across a well-rounded and culturally responsive curriculum for general and special education students.
- Creating positive school climates that balance physical and psychological safety for all students.
- Providing access to comprehensive school-based mental and behavioral health services and ensure adequate staffing levels of appropriately trained school employed mental health professionals.
- Increasing family and community engagement to support student success.
- Creating systems that support the recruitment and retention of properly trained and prepared professionals that reflect the diversity of the school community.
- Creating accountability systems that use a broad set of measures to inform specific actions that improve school quality and provide an understanding of how specific outcomes were achieved.

NASP represents over 24,000 school psychologists who work with students, educators, and families to support the academic achievement, positive behavior, and mental wellness of all students, especially those who struggle with barriers to learning. These professionals are critical to upholding the principles of *Ready to Learn* and supporting the needs of all students. We recommend a school psychologist to student ratio of 1:500; however, the national ratio is 1:1381, with many districts reporting a ratio of greater than 1:2000. This critical shortage of school psychologists prevents many students from receiving the mental health and learning supports they need to thrive and succeed in school, at home, and in life. We must prioritize addressing the critical shortages in school psychology and we are committed to working with your administration to do so.

This memo provides detail on specific actions we urge your administration to take. We encourage you to prioritize:

- Expanding the school mental health workforce, including addressing the critical shortage in school psychology
- Advancing comprehensive school safety efforts, including those that help improve school climate and reduce exclusionary discipline
- Increasing investments in public education
- Reinstating critical guidance documents rescinded by the Trump administration

Your leadership on education is critical to the future of our children and our country. NASP appreciates your commitment to leveraging the expertise of key stakeholders to work toward implementing evidence based solutions to these challenges.
Prioritize expanding the school mental health workforce including addressing the critical shortage in school psychology

NASP is deeply grateful for your efforts to highlight the importance of school mental health and the critical shortages in school psychology and other mental health professions. Schools across the country are grappling with how to address the growing mental health needs and rising suicide rates among students, that have been exacerbated by COVID-19. Schools are an essential part of the mental health services continuum. Because they are the most accessible place to identify and support struggling students, it is paramount that we provide them the necessary resources to do so, including adequate access to school psychologists. Mental health problems interfere with learning, behavior, social engagement, overall well-being, and sometimes physical safety. One in five students will experience a mental health problem that requires support, yet approximately 80% of them will not receive the necessary services. Of those who do receive services, the vast majority access them at school. Students are more likely to receive mental health services if they are offered at school—especially in low-income communities. However, shortages of school psychologists and other school-employed mental health professionals greatly diminish the availability of needed services.

We are very encouraged by your pledge to double the number of school psychologists, counselors, and social workers in our schools. Achieving this goal will require investments to help districts recruit and retain school psychologists, combined with efforts to increase the capacity of universities to provide the necessary graduate education and training to improve the available workforce pipeline. A recent analysis revealed that we need more than 60,000 school psychologists to meet the NASP recommended ratio. There are approximately 35,000 practicing school psychologists, and doubling the available workforce will take sustained federal, state, and local leadership. We offer the following recommendations to help tackle this critical issue.

- **Expand and fairly implement the Public Service Loan Forgiveness Program, the National Health Service Corps.**
- **Significantly expand the Mental Health Service Professionals Demonstration Grant and the School Based Mental Health Services Grant Program.** Each of these demonstration grants, operated within the Office of Safe and Supportive Schools, are specifically intended to help LEAs and SEAs recruit, retain, and train school based mental health professionals. Each grant was initially funded at approximately $10 million dollars, but in order for us to expedite the number of school psychologists and other professionals entering the workforce, these grants must be scaled up. We urge you to prioritize these and other grants intended to address workforce shortages.
- **Prioritize efforts to increase the number of school psychologists and other school mental health professionals in the Department of Education’s Competitive Grant Priorities.** The Secretary has great authority in setting competitive priorities for the various grants operated by the Department. School psychologists have specific training and expertise in school-wide prevention and wellness promotion, assessment and evaluation of needs, individual and group counseling, consultation with teachers and administrators, and crisis intervention and recovery supports such as trauma informed supports and suicide risk and threat assessments. The Department should prioritize applications that include efforts to increase their school mental health workforce as part of the grant activity planning, when appropriate.
- **Engage in a national call to service.** We urge you to use the influence of the office of the President to highlight the value of pursuing a career in public service, such as a school psychologist or school employed mental health professional. This call should be coupled with loan forgiveness and grant opportunities.
- **Convene an interagency task force** focused on identifying short and long term federal strategies to improve access to school mental health services and address the workforce shortages. Stakeholders must include:
  - Officials from the White House and Department of Education
  - Representatives of major school mental health organizations including the National Association of School Psychologists, American School Counselor Association, and School Social Work Association of America

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[www.nasponline.org](http://www.nasponline.org)
Representatives from school administrator organizations including the National School Boards Association, AASA, the School Superintendents Association, the National Association of Secondary School Principals, and the National Association of Elementary School Principals

Directors of the National Center for School Mental Health

Representatives from Institutions of Higher Education

- **Prioritize addressing mental health shortages in the Higher Education Act.** As previously stated, we cannot fully address the shortages in school psychology without active engagement within higher education. We must provide financial incentives/assistance to institutions of higher education to allow them to create new graduate education programs and scale up existing programs that expand access to proper training necessary to receive a credential as a school psychologist or other school mental health professional.

- **Lower barriers to school-based Medicaid reimbursement for school psychologists.** Funds from the school-based Medicaid program help sustain and expand comprehensive school mental health systems and access to school mental health professionals. However, due to inconsistent interpretation of a CMS guidance document, 15 states do not recognize school psychologists as qualified providers of Medicaid services, which leads districts to hire other, less qualified, individuals to provide school services. We urge you to direct the Center for Medicaid and Medicare Services to update the Administrative Claiming Technical Assistance Guide, published in 1995, to reflect language in the Patient Protection and Affordable Care Act that school psychologists are qualified providers of mental and behavioral health services. Furthermore, the guide should clarify that the language, “Medicaid regulations require that provider qualifications be uniform and standard. This means that states cannot have one set of provider qualifications for school providers and another set of provider qualifications for all other providers,” does not mean that school psychologists and other school professionals need to be credentialed to provide services in the school AND community setting in order to be considered a qualified provider of Medicaid services.

- **Work with Congress to pass legislation aimed at addressing the workforce shortages in school psychology.** Congress has proposed three pieces of legislation focused on various solutions to the critical shortages in school psychology. We urge you to work with Congress to pass these critical pieces of legislation:
  - **Elementary and Secondary School Counseling Act**
  - **Increasing Access to Mental Health in Schools Act**
  - **Mental Health in Schools Excellence Program Act**

Prioritize comprehensive school safety efforts including those that help improve school climate and reduce exclusionary discipline

NASP believes that the United States has no greater responsibility than safeguarding the well-being of our children and youth. Ensuring safe schools and communities is paramount to this responsibility. Critical to this effort is federal leadership—defined by specific guidance and critical resources—to help states and districts ensure that every child attends a safe and supportive school. Unfortunately, many districts have prioritized physical safety in ways that may not be effective and may even be harmful to students’ sense of psychological safety, especially among students from traditionally marginalized communities. NASP has a long history of working with federal agencies to develop guidance and resources that help schools balance physical and psychological safety and we look forward to working with your administration to highlight the importance of a comprehensive approach, as outlined in our Framework for Safe and Successful Schools, that includes:

- Increased federal investments in comprehensive school safety efforts tailored to the unique needs of individual school communities.
- Comprehensive school mental health services and increasing access to school employed mental health professionals.
- Creating a positive school climate and fostering trusting positive relationships among students and staff.
- Using multidisciplinary teams (and the important role of the school psychologist) to develop systems that promote-trauma informed practices and positive school climates; help identify and intervene with students...
who need support; engage in appropriate threat assessment and management protocols; and help schools respond to and recover from school crises.

- Promote the use of positive and effective discipline strategies and prohibit the use of zero tolerance policies; require evaluation of these efforts and modify them as needed in order to reduce disproportionality.
- Establish a process for universal screening for academic, behavioral, and emotional barriers to learning.
- Provide annual (or biannual) professional development to all school staff in mental health first-aid, the appropriate referral process, suicide prevention, and other relevant mental and behavioral health topics.
- Develop policies and procedures for conducting suicide risk and threat assessments.

Increase investments in public education

Maintaining a high-quality public education system is one of the greatest responsibilities of the United States government and one of the wisest investments in the nation’s future. We are encouraged by your pledge to triple funding for Title I and to fulfill Congress’ obligation to fully fund IDEA. In addition to this effort, we urge you to abandon the Trump Administration’s efforts to advance ineffective and discriminatory private school choice options and focus on improving our system of public schools, magnet schools and public charters that are held to the same standards as traditional public schools. Congress enacted the Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act, and the Americans With Disabilities Act, to stop schools from discriminating against students with disabilities. Unfortunately, these protections do not apply to most private schools participating in voucher programs. As a result, students with disabilities who use vouchers or tax credits to attend private schools on the promise of an improved educational experience lose most of the fundamental protections and services guaranteed by federal law—including the individual right to a free appropriate education, the right to be educated in the least restrictive environment, most antidiscrimination protections, and safeguards against disability-based discipline. To be clear, we oppose any educational funding system that funnels public money to pre-K–12 schools that lack public accountability, require the loss or declination of rights afforded to students or families, or enable discriminatory practices. Over 90% of our nation’s children and youth attend public schools and as such, and we urge your Administration to focus on efforts that create a high-quality public school for every child, regardless of where they live.

We recognize that much of what we propose will take time, and in some cases may require Congressional approval. However, there are some immediate actions your Administration can undertake that would signal your commitment to upholding the civil rights of minoritized youth and provide much needed guidance to schools on how to improve their school climate and discipline practices.

Reinstate Critical Guidance Documents Rescinded by the Trump Administration

We urge you to immediately reissue the 2014 Discipline Guidance package issued by the Department of Education and the Department of Justice. This guidance provided clear recommendations to help improve school climate, implement effective discipline practices, and address the racial disparities that continue to exist. Assertions that the school discipline guidance has decreased safety in schools are not grounded in research or reality. Schools that have implemented interventions as a result of the guidance such as providing more mental health supports, implementing restorative practices, and teaching students social and emotional skills have reported improved student behavior and safer schools. Evidence supports the use of positive discipline policies that are consistent and fair and include multitiered supports, rather than overly harsh and punitive approaches such as "zero tolerance" policies. The 2014 guidance is vital to deter systemic disparities, implicit biases, and discipline policies with minor and subjectively defined offenses (such as insubordination) and we urge you to reinstate it as quickly as possible.

We also urge you to reinstate the 2016 Guidance regarding Title IX and Civil Rights protections for transgender students. NASP affirms our long-standing position on necessary policies and practices to support the safety and well-being of all students, including those who are transgender and gender diverse. We believe that the civil rights of transgender students are protected as part of U.S. public schools’ obligations under Title IX of the Education Amendments of 1972. This includes respecting a person’s right to express gender identity, and the right to modify
gender expression when necessary, and to have their gender identity affirmed and acknowledged. Our position is consistent with all major medical, mental health, and education organizations. Most courts also agree Title IX protects transgender students and schools continue to have a legal and a moral duty to support them. Schools nationwide are increasingly supporting and affirming transgender students, and most will continue to do so with or without guidance from the Administration. Over 40% of K-12 students attend schools with affirming state or local policies, and that number is rapidly growing. However, federal guidance and/or further legislation that more explicitly clarifies this protection is needed in order to ensure the protection of students’ civil rights in every school in the country. We urge you to reissue this guidance as quickly as possible.

Reverse Executive Order on Combating Race and Sex Stereotyping
The impact of racism can be felt in every aspect of society, including schools; however, the existence of systemic racism is not universally acknowledged, nor accepted. As a result, not all are committed to actively confronting racism both on an individual and systemic level. We firmly believe that in order to confront and root out racism, the adults who are employed by the U.S. Department of Education, and other entities funded with federal dollars, must have the freedom to engage in anti-racism trainings which support the necessary frank and honest conversations we must have in order to move forward. Trainings exploring anti-racism, diversity, white privilege, and critical race theory are not political and they are certainly not “un-American propaganda.” We remain alarmed at the September, 4, 2020 “cease and desist” memo from the Office of Management and Budget and President Trump’s subsequent Executive Order. Part of the mission of the U.S. Department of Education is to “ensure equity for all” – for this to truly happen, employees at the Department must have the freedom to explore what equity truly is. We urge you to immediately rescind this Memo and Executive Order and take concerted steps to elevate the importance of efforts to examine implicit bias and engage in anti-racism in education.

NASP is committed to working with your Administration, other policymakers, educators, parents, and others concerned with helping children achieve their best. We have long led or collaborated on efforts related to special education, school-based mental and behavioral health services, improved home-school collaboration, effective discipline and violence prevention, and school crisis response. We are actively involved in efforts to create trauma informed schools, support the needs of culturally and linguistically diverse students, and protect all students’ civil rights.

We look forward to supporting your efforts to craft education policies that will truly achieve excellence in education and a positive future for all of our children. Please feel free to contact Kelly Vaillancourt Strobach, NASP Director of Policy and Advocacy (kvaillancourt@naspweb.org) / (301) 657-0270 with any questions and comments.

Sincerely,

Wendy Price, Psy.D, NCSP
President

Kathleen Minke, PhD, NCSP
Executive Director

CC: Linda Darling-Hammond, Team Lead, Education Transition Team