

February 10, 2021

On behalf of the National Association of School Psychologists (NASP), we are pleased to provide input on the upcoming volumes of information to help schools address COVID-19 related learning needs and plan for a safe return to in-person instruction. The bulk of the feedback in this document focuses on Volume 1, with a particular focus on additional supports and protections for students and educators, including trauma-informed approaches to meeting the social-emotional needs of students and staff. NASP believes that coordinated federal leadership, led by the CDC and Department of Education, is necessary to help states and local education agencies effectively meet the needs of students and determine the appropriate instructional method (e.g., in person, hybrid, virtual) based on local infrastructure and data regarding community spread of COVID-19. We are pleased to see the Administration moving swiftly to release clear, practical, and evidence-based guidance to assist schools in this endeavor. The National Association of School Psychologists' [COVID-19 Resource Center](#) contains a wealth of guidance and resources on topics including: effectively measuring and addressing academic need; supporting student's social emotional learning and mental and behavioral health; virtual service delivery and telehealth considerations; equity and social justice related issues; meeting the needs of students with disabilities; and school safety and crisis response. As the Department continues to issue guidance and provide resources to schools, we urge you to include these resources.

Recommendations for Volume 1

The decision to return to in-person instruction in our nation's schools must be driven by a principle of least harm, guided by reliable public health data, and it must consider the needs of students, families, and staff. Importantly, as appropriate, decisions must be made in collaboration with relevant stakeholder groups including families, educators, administrators, and specialized instructional support personnel such as school psychologists.

Use of Funds

For schools to reopen safely, there must be attention to each school building's physical design (e.g., ventilation systems, capacity for social distancing, access to supplies needed to prevent the spread of COVID), the educational and health needs of students and staff, and the capacity of schools to meet those needs. For school leaders to meet the complex demands of this crisis, they must be empowered by not just words but also by evidence-based guidance and the substantial financial investments necessary to ensure that our nation's schools can safely return to in-person education. Even in communities that are successfully controlling the virus, in-person schooling will require new and substantial financial investment. We appreciate the Biden Administration's commitment to providing schools with the funding they have repeatedly requested to implement CDC guidelines and protect the health of students and staff. Funds will be needed to upgrade facilities for better ventilation, distancing, and sanitation.

Funding is also needed to ensure adequate staffing levels and the availability of the full range of academic, social-emotional, and mental and behavioral health services to all students. Without additional investments, districts will be forced to continue to lay off teachers, school-employed mental health professionals, nurses, and other specialized instructional support personnel. Notably, significant staffing shortages existed prior to the COVID-19 pandemic, and such layoffs only exacerbate these gaps. Districts are laying off employees at a time when we need more, not fewer, educators in our schools to support our students and families. Preparations must also be made to support staff members' ability to work. Funds will be needed to cover extended sick leaves for impacted staff. There need to be clear, appropriate policies for quarantine leaves, both for individual staff who must quarantine or leave to care for sick family members and for all personnel if schools must close to manage outbreaks. Additional staff must be hired to manage the complex academic and mental health needs described above, especially in areas that lack adequate access to school mental health services and professionals.

Social-Emotional and Mental Health Supports for Students and Staff

NASP and school psychologists have been extremely concerned about the pandemic's impact on student and staff mental health, regardless of the mode of instruction and service delivery. It is imperative that schools prioritize efforts to reinforce student social-emotional learning, infuse mental wellness and promotion activities into the curriculum, and ensure that students and staff alike have access to school based mental health services and professionals. School psychologists and other school employed mental health professionals (e.g., school counselors and school social workers) must be integrally involved in the development and execution of these plans. We urge the Department to explicitly reference the importance of engagement with these professionals as schools develop these plans.

To help schools address the social-emotional needs of students and staff, NASP partnered with the American School Counselor Association to develop [*School Reentry Considerations: Supporting Student Social and Emotional Learning and Mental and Behavioral Health Amidst COVID-19*](#). This document outlines key considerations for district and building leaders, educators and school-employed mental health professionals (e.g. school counselors, school psychologists and school social workers) to guide efforts that support students' social and emotional well-being. The document also focuses on the many discussions that must occur locally to help prepare schools to support students' psychological safety, social and emotional learning, and mental and behavioral health. Specifically, the document identified considerations related to:

- Addressing social and emotional learning and mental health needs
- Relationships and transitions
- The increased potential for adversity and trauma
- Addressing physical and psychological safety
- School discipline
- Addressing staff needs
- Family engagement
- Access to school-employed mental health professionals
- Multidisciplinary decision making

Embedded within this document are additional resources to facilitate appropriate planning and service delivery to address student and staff need and we encourage the Department to highlight these evidence-based resources in your communications to state, district, and school building leaders. Additional mental health resources are available [here](#) and NASP looks forward to providing more comprehensive feedback on this topic for Volume II.

It is also critically important that schools continue to engage in comprehensive suicide prevention programming, especially during these times of increased social isolation. As you prepare guidance for Volume I and Volume II, we strongly urge you to address the importance of suicide prevention. NASP has developed [resources](#) to assist with this effort.

Volume II

As the Department plans for resource development for Volume II, NASP appreciates the opportunity to provide feedback on the draft list of topics. Below are the topics for which NASP would like to provide comprehensive feedback when the Department is ready. We also offer suggestions for additional topics that are being considered for inclusion in Volume II. NASP and school psychologists have expertise in evidence-based strategies to improve the academic, social-emotional learning, and mental and behavioral health outcomes for students. We also have expertise in creating systems that are safe and supportive for all students, incorporate positive discipline, and prepared and responsive to school crises and emergencies. As such, it is imperative that the perspective of school psychologists and the NASP be included on specific proposed topics for Volume II. Resources relevant to specific topics are included below and we are happy to provide additional information when the time comes.

- **Social-emotional well-being of students and educators**
 - [*School Reentry Considerations: Supporting Student Social and Emotional Learning and Mental and Behavioral Health Amidst COVID-19*](#).
 - [Providing Effective Social Emotional and Behavioral Supports After COVID-19](#)

- **Bridging learning opportunities and/or gaps**
 - [Considerations for academic Screening Upon the Return to School](#)
 - [Considerations for Academic Assessments and Interventions Upon the Return to School](#)
- **Support for educators, including advancing educator diversity**
- **Equity, including racial and socioeconomic impact and resource equity**
 - [Equity Considerations During and After COVID-19 School Closures](#)
- **School discipline**
 - [Framework for Effective School Discipline](#)
- **Data to support students, parents, and educators**

In addition to the proposed topics, we suggest that the Department explicitly address the following by creating a separate topic or incorporating these challenges into other related topics:

- Recruiting and retaining school psychologists and other specialized instructional support personnel, particularly in areas where shortages exist
- Meeting the needs of students with disabilities
- School climate and safety, including trauma informed approaches to service delivery.

Thank you for the opportunity to provide feedback on upcoming resources related to a safe return to in-person learning. We look forward to continued collaboration to help address the myriad needs of students and families. Please contact Dr. Kelly Vaillancourt Strobach (kvaillancourt@naspweb.org), NASP Director of Policy and Advocacy with any questions or for more information.



Kathleen Minke, PhD, NCSP
Executive Director