

July 29, 2021

Nkemjika Ofodile-Carruthers  
U.S. Department of Education  
400 Maryland Avenue SW, Room 4W308  
Washington, DC 20202

RE: ED-2021-OPEPD-0054

Submitted at: [www.regulations.gov](http://www.regulations.gov)

Dear Ms. Carruthers,

On behalf of the National Association of School Psychologists (NASP), thank you for the opportunity to provide feedback on the Secretary's six proposed priorities and related definitions for use in discretionary grant programs that exist today or may exist in the future. NASP believes that maintaining a high-quality public education system is one of the greatest responsibilities of the United States and a wise investment in the nation's future. We are committed to ensuring all students have access to a high-quality public education that provides them with the comprehensive skills necessary to be successful. We are also committed to working with the Department of Education, policymakers, and other stakeholders to advance policies that increase the availability of high-quality public schools that support all students. NASP represents 25,000 school psychologists who work with parents, families, teachers, administrators and students to help create safe and supportive school environments, reduce barriers to learning, and ensure all students have access to the comprehensive supports they need to thrive in school, at home, and throughout life. With this mission in mind, we offer the following comments on select proposed priorities.

**Proposed Priority 1—Addressing the Impact of COVID-19 on Students, Educators, and Faculty**

NASP is pleased to see that the Department of Education is continuing to focus on the short- and long-term effects of the COVID-19 pandemic on student's learning, social/emotional and mental and behavioral health, and equitable access to supports and services, including technology. The pandemic laid bare and exacerbated existing inequities in our education system, whether they be in access to instruction and learning materials, mental and behavioral health supports and professionals, or basic needs like food and shelter. We agree that providing continued technical assistance and resources to schools to help them address COVID related needs is paramount, but we also hope the Department assists states and districts in taking this opportunity to rethink how we provide instruction to students and how we offer supports. We have an opportunity to reshape our public education system and we urge our leaders to maximize this once in a generation opportunity. We offer the following comments on the following proposed priorities.

*1A - Conducting community asset-mapping and needs assessments that may include an assessment of the extent to which students have become disengaged from learning, including students not participating in in-person or remote instruction, and specific strategies for reengaging and supporting students:*

The loss of instruction due to COVID-19 closures and the loss of spring testing data creates a significant challenge for school psychologists who wish to meet the needs of diverse learners, including identifying and making eligible those students who require special education. NASP has developed a series of resources and webinars to provide actionable how-to advice to cope with missing academic data, identify children in need of instructional supports, and use the resulting data to inform referral and eligibility decisions. There will be a

higher prevalence of academic risk in nearly all schools. Children will be arriving at the next grade level having only received about a 75% dose of the prior year's academic instruction. Our resource, [Considerations for Academic Assessments and Interventions Upon the Return to School](#), describes the necessary screening adjustments and class-wide interventions useful for getting students back on track in the absence of data and loss of instruction. We urge the Department to encourage recipients of federal funds to focus their efforts on providing meaningful interventions to as many students as possible rather than prioritizing gathering perfect data.

NASP fully supports effective school community partnerships to ensure that every student has access to a full array of academic, social emotional learning, and mental and behavioral health supports before, during, and after school. However, these partnerships must be collaborative. We urge the Department to require a multi-disciplinary team that includes school and community partners in any project intended to conduct community asset mapping and needs assessment. These partnerships cannot be one sided and must be jointly developed by school and community providers.

**1B** - *Providing resources and supports to meet the basic, fundamental, health and safety needs of students and educators.*

In response to the increased financial instability of families who may have experienced or continue to experience joblessness, housing and food insecurity, and are otherwise not having their needs met because of the pandemic; the Department of Education should encourage inter-agency collaboration between State departments of education, food and nutrition agencies, public health departments, and other social services providers. In addition, we urge the Department to continue a focus on meeting the health and safety needs of educators. We cannot expect our educators to fully support the needs of our students if they are not receiving the support they also need.

**1C** – *Addressing Students' Social and Emotional Needs:*

While academic screening and interventions are crucial to bringing students back on track, educators must address the social-emotional, behavioral and mental health needs of students for a successful return to the classroom. Under normal circumstances, we would expect approximately 20% of children to experience some social-emotional and behavioral (SEB) concern throughout their school trajectory—we now expect these rates to double or triple after COVID.

Given the high number of students in need, solely providing SEB or mental health supports in a traditional one-on-one or small-group counseling model is not an option. School mental health professionals run the risk of quickly become overwhelmed and exhausting existing supports. Given the limited availability of mental health professionals to meet the individual needs of students, we must accelerate a transition to a continuum of supports with a specific focus on school-wide SEB supports. We urge the Department to fund programs that engage in multitiered systems of support that address the SEB needs of all students. We urge the Department to allow projects that seek to address the shortages of school mental health professionals to be funded under this priority. Importantly, any project that proposes to form a school-community partnership must clearly outline the key roles and responsibilities (Memorandums of Understanding) of school employed mental health professionals and those of community providers. NASP, in collaboration with the National Center for School Mental Health developed a [brief](#) outlining key elements of successful partnerships, and we urge the Department to use this as a framework when designing and evaluating potential grantees seeking to engage in this work.

**1D** - *Addressing teacher, faculty, and staff well-being:*

To address the well-being of school staff long-term, we must see increased investment in programs that assist K-12 schools to recruit and retain staff and increase the capacity of educator training programs to provide the

workforce necessary to meet the growing needs of students. NASP fully supports the Administration's commitment to doubling the number of school psychologists, nurses, counselors, and social workers. This commitment, if realized, will go a long way toward reducing burnout and increasing capacity to provide high-quality and comprehensive school psychological services.

In the short-term, the Department of Education should encourage and allow schools receiving federal relief funds to use creative staffing methods to shift the burden of certain routine administrative tasks from trained mental health professionals to administrative staff. This will allow school psychologists and other school-based mental health professionals to spend more time working directly with students, providing interventions, and administering students' individualized education plans under IDEA.

*1E – Providing students and educators with access to reliable high-speed broadband and devices; providing students with access to high-quality, technology-supported learning experiences that are accessible to children or students with disabilities and educators with disabilities to accelerate learning; and providing educators with access to job-embedded professional development to support the effective use of technology*

NASP has advocated for equitable remote access to mental health and other school psychological services. We urge the Department of Education to continue to prioritize funding for technological devices and high-speed broadband to school districts most in need. As schools increase their capacity for remote learning and service delivery, it is critical that school districts ensure the safety and privacy of students. While most learning is returning to the classroom environment, we also encourage the Department to encourage school districts to continue to incorporate virtual learning and service delivery. With critical shortages in school psychology nationwide, expanding service delivery through virtual means has allowed school psychologists to reduce travel time between schools and districts and assist more students than they otherwise might have been able to. We encourage the Department to assist school districts in incorporating virtual service delivery beyond the pandemic and ensure that guidance is given to highlight important ethical and practical considerations for its use.

*1G – Using evidence-based instructional approaches and supports to accelerate learning for students in ways that ensure all students have the opportunity to successfully meet challenging academic content standards without contributing to tracking or remedial courses*

Although existing research indicates some students have experienced fewer academic gains than expected, we may not know the full impact of COVID-19 learning disruptions and loss of instructional time for some time. There are also limited data regarding the effectiveness of certain accelerated learning approaches, especially for students with disabilities. We urge the Department to exercise caution when awarding grants for these purposes. In addition, we strongly urge the Department to closely monitor the use of retention and/or special education eligibility as a way of addressing instructional gaps. NASP strongly opposes these strategies as a way of addressing COVID related learning loss. Additional details and guidance that we hope the Department will incorporate is available [here](#).

### **Proposed Priority 2—Promoting Equity in Student Access to Educational Resources, Opportunities, and Welcoming Environments.**

For all students to have full access to a high-quality public education, school systems must routinely analyze existing structures, policies, and procedures to determine those that create barriers and disparate access and outcomes for some students. This includes identifying and dismantling the racist, homophobic, and discriminatory structures that perpetuate inequity both in terms of access to resources and outcomes for children of minoritized and low income and economically marginalized background. We urge the Department to prioritize funding for projects that assess and remediate disproportionality in special education identification, eligibility in gifted education, access to advanced courses, disciplinary measures, and academic outcomes.

We also recognize that students learn better and feel more comfortable in their schools when the educator workforce reflects them. Department of Education funding should go toward projects that prioritize the recruitment and retention of school staff with minoritized identities or backgrounds, particularly in leadership positions. NASP understands the importance of improving recruitment and retention of teachers, but this work must include the full array of educators to include administrators, school based mental health services providers (e.g. school psychologists), and specialized instructional support personnel.

We urge continuation of the existing efforts of the Department of Education and other relevant agencies to designate resources to help implement evidence-based, school-wide policies and practices that reduce bullying, harassment, violence, and discrimination for all students regardless of their race, ethnicity, religion, socioeconomic status, gender (including identification and expression), sexual orientation, disability status, language proficiency, immigration status, or any other dimension of difference.

NASP also encourages the Department to ensure federal funding goes to projects that promote the use of effective, positive school discipline that: (a) functions in concert with efforts to address school safety and climate; (b) is not overly punitive (e.g., zero tolerance); (c) is clear, consistent, and equitable; (d) teaches and reinforces positive behaviors; (e) is not discriminatory nor results in the disproportionate use of exclusionary discipline with certain populations; and (f) does not contribute to the school-to-prison pipeline. We support project funding for high-quality, evidence-based, job-embedded, and discipline specific professional development for educators, school based mental health services providers, specialized instructional support personnel, and other relevant staff in areas including but not limited to: implicit bias, antibullying, antiharassment, and antidiscrimination efforts; evidence-based threat assessment and management procedures; school-based violence prevention; positive discipline strategies; and restorative justice practices. All professional development should be culturally responsive. Importantly, we urge the Department to reject any potential grantee application that seeks to willfully misrepresent and/or ban the topics of Critical Race Theory, implicit bias, systemic racism, and other important conversations that provide students with an accurate representation and understanding of our nation's history and opportunities to develop critical thinking skills around these and other complex topics.

### **Proposed Priority 3—Supporting a Diverse Educator Workforce and Professional Growth to Strengthen Student Learning.**

NASP recognizes the importance of building an educator workforce that reflects the populations they serve. Within that framework, any projects funded to increase educator workforce diversity should include school psychologists and other specialized instructional support personnel (SISP) that provide related services under the Individuals with Disabilities Education Act (IDEA). We urge any funding announcement to explicitly state that projects intended to increase diversity among school psychologists, specialized instructional support personnel, and other educators are allowed under this priority. Project funding should go toward recruiting and retaining diverse educators and ensuring that students from minoritized backgrounds are able to pursue higher education without significant financial or logistical barriers. Furthermore, funding to universities would support scholarships/grants and encourage students from minoritized backgrounds to apply to graduate training programs or consider re-training or re-specialization programs of study to become credentialed as a school psychologist.

We further urge the Department to support the use and increase the availability of federal funds to provide professional development on critical race theory, diversity, White privilege, mitigating implicit bias, culturally responsive and antiracist practices within the school context, and other critical concepts necessary to promote an antiracist and culturally responsive education system. We urge the rejection of any effort to willfully misrepresent these topics and the importance of addressing them in our public schools. As stated above, we also support project funding for high-quality, evidence-based, job-embedded, and discipline specific professional development for educators, specialized instructional support personnel, and other relevant staff in areas including but not limited to: implicit bias, antibullying, antiharassment, and antidiscrimination efforts; evidence-based threat assessment and management procedures; school-based violence prevention; positive

discipline strategies; and restorative justice practices. All professional development should be culturally responsive.

We also offer the following suggestion under this priority:

*Proposed Priority: Projects that are designed to increase the proportion of well-prepared, diverse, and effective educators serving students, with a focus on underserved students, through one or more of the following priority areas*

The proposed priority describes several areas regarding high quality job-embedded professional development opportunities (e.g. meeting the needs of children or students with disabilities; addressing inequities and bias and developing racially, ethnically, culturally, and linguistically inclusive pedagogy; creating safe, healthy, inclusive, and productive classroom environments). Offering this type of professional development is important. However, it is equally important that we increase the inclusion of these topics into pre-service educator preparation programs in order to increase the number of educators who enter the classroom on Day 1 with foundational understanding of these practices. We urge the Department to add a priority area focused on expanding inclusion of these topics in educator preparation programs.

#### **Proposed Priority 4— Meeting Student Social, Emotional, and Academic Needs.**

Addressing instructional loss or learning disruption remains an important objective; however, students will not be ready to engage in intensive and rigorous academic learning until they feel physically and psychologically safe. Establishing that sense of safety and a predictable routine may take weeks or even months, depending on the evolving context in individual communities and a range of factors unique to each individual. Even within a school community, individual students and staff may continue to experience different stressors that could affect their personal sense of safety. NASP encourages the use of a tiered system of academic and SEB supports that addresses students' unique educational needs. Students should have opportunities to access materials and resources and instructional methods that foster continuous improvement. NASP supports programmatic funding that is culturally responsive and encourages collaboration between school employed and community providers.

However, we recommend that any grant related to school community partnerships must include language about how the community providers will collaborate with existing school personnel (e.g. school psychologists, counselors, social workers, and other specialized instructional support personnel) and supplement existing services, not supplant school-based professionals. We also ask that the Department ensure that school psychologists and other specialized instructional support personnel are explicitly mentioned in guidance and grant programs intended to address literacy, social-emotional learning, school climate, school discipline, and other factors that promote student learning. These professionals have unique training and expertise in these areas and must be included in any funding opportunity to support student success.

We offer additional recommendations on specific additional priorities below:

*B(4) Developing and implementing inclusive and culturally informed discipline policies and addressing disparities in school discipline policy by identifying and addressing the root causes of those disparities, including by providing training and resources to support educators.*

NASP encourages the implementation of effective discipline policy and practice as outlined in our [Framework for Effective Discipline](#). We encourage the Department to prioritize the development and implementation of culturally informed discipline policies, while also simultaneously incentivizing the elimination of zero tolerance and exclusionary discipline practices.

*G. Providing students equitable access to social workers, psychologists, counselors, nurses, or mental health professionals and other integrated services and supports, which may include in early learning environments.*

We recommend that the Department explicitly use the terms *school* social worker, *school* psychologist, and *school* counselor, and other school based mental health services professionals, as defined by the Every Student Succeeds Act. School psychologists, school counselors, and school social workers have specific and unique training and expertise to provide comprehensive services in the learning environment and should be specifically included in this priority.

**Proposed Priority 5—Increasing Postsecondary Education, Access, Affordability, Completion, and Post Enrollment Success.**

NASP is appreciative of the Department’s commitment to ensuring the accessibility and affordability of higher education for those that wish to pursue it. Because of the advanced training school psychologists receive at the specialist and doctoral level, there is a higher barrier to entry in our profession. Making higher education more accessible is a key component in remedying the shortages of school psychologists. We urge the Department to include efforts to lower barriers to obtaining graduate education, particularly for fields experiencing critical shortages, such as school psychology.

**Proposed Priority 6—Strengthening Cross-Agency Coordination and Community Engagement to Advance Systemic Change.**

NASP agrees with the Department’s assertion that schools can and should be the center of the community and provide students with access to a full array of services and resources to help them thrive. We urge the Department to prioritize partnerships that align with [guidance](#) developed by the Coalition for Community Schools and NASP.

Thank you for the opportunity to comment and we look forward to continued collaboration to advance our shared priorities. Additional questions can be directed to Dr. Kelly Vaillancourt Strobach, NASP Director of Policy and Advocacy ([kvaillancourt@naspweb.org](mailto:kvaillancourt@naspweb.org)).

Sincerely,



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Executive Director