To Whom It May Concern,

I am writing in regards to the second draft of the Every Student Succeeds Act (ESSA) that was released on January 9th, 2017. First, on behalf of the Delaware Association of School Psychologists (DASP), as well as School Psychologists in the state of Delaware, I want to thank the Delaware Department of Education (DDOE) for the addition of School Psychologists into the Framework Document. This inclusion demonstrates not only the state’s commitment to incorporating feedback from stakeholders, but also its recognition of the importance of School Psychologists as a means to support a whole-child approach to education in the state of Delaware.

Upon review of the second draft of ESSA, there are a few comments that I would like to make to support the needs of our children.  These thoughts are listed below for your review and consideration as we move toward completion of Delaware’s final draft of ESSA.

**Inclusion of School Psychologists in Delaware’s ESSA Plan**

As mentioned previously, the most recent revision of Delaware’s ESSA plan includes a Framework Document that references the role of School Psychologist. However, when reviewing the actual draft of the state’s ESSA plan, School Psychologists are still notably absent. This is somewhat unexpected, as School Psychologists are explicitly named twice in the federal ESSA legislation: as School-Based Mental Health Service Providers and as Specialized Instructional Support Personnel. As such, I feel that it is critical that the language in Delaware’s ESSA plan be aligned with the federal ESSA plan. For example, under Section 4 of the current draft, specialist-to-student ratios are mentioned as a way to measure students’ access to resources (as a possible indicator of school quality). Rather than using the broader term of Specialized Instructional Support Staff in reference to those ratios, Delaware’s plan explicitly names only three specialist groups: school counselors, school nurses, and librarians. I am concerned that this constitutes exclusion by omission – if LEAs choose to use specialist-to-student ratios as a measure of school quality, they will be more likely to focus on specialists explicitly named in Delaware’s ESSA implementation plan than those who are not.

I believe that measuring student access to Specialized Instructional Support Personnel in recommended ratios is an important indicator of school quality, as it shows the LEA’s commitment to academic excellence, but also the physical and social-emotional well-being of the children served. However, it is critical that Delaware’s ESSA plan is inclusive of all of the Specialized Instructional Support Personnel specified in the federal ESSA legislation.

**Clear and Consistent Use of Terms**

In Delaware’s ESSA plan, the terms “educator” and “teacher” occur frequently throughout the document. However, there are multiple occasions in which the term “teacher” is used where the term “educator” may be more appropriate. In other instances, the term “teacher” is used to reference something that is specific to classroom teachers. I feel that the choice to use one of these terms over the other should be made thoughtfully as these terms represent an important distinction between issues that are only applicable to classroom teachers vs. all educators (e.g., teachers, therapists, nurses, paraeducators, etc.). For example, in Section 5.2.B of Delaware’s draft ESSA plan, the first sentence under the subheading emphasizes the importance of professional learning experiences for educators. However, the very next line refers specifically to “teacher professional learning”. As this statement underscores the point that professional learning content should be related to professional growth needs and the needs of students, the federal ESSA legislation clearly states that these goals apply to the professional development of all educators. It seems to be an oversight that the term “teacher” was used rather than the term “educator. However, this oversight could result in the devaluing of professional learning of non-teacher educator groups in a literal interpretation of that statement.

I feel that Delaware’s final ESSA plan should ensure that the terms “educator” and “teacher” are used purposefully throughout the entire document.

**Opportunities for Growth for ALL Educators**

Supporting excellence for educators is a key theme in Section 5 of Delaware’s ESSA plan, and I am supportive of strategies that allow our best teachers to advance in the profession through the cultivation of leadership skills while still staying in the classroom. We ask for consideration of an extension of that opportunity to other educators who can (and often do) assume leadership positions in schools. This includes not only School Psychologists, but also school counselors, paraeducators, nurses, librarians, educational diagnosticians, speech/language pathologists, and administrative assistants.

I feel strongly that the language in Delaware’s ESSA plan include not just the “Teacher Leader” initiatives/pilot program, but also recognition of the importance of cultivating professional leadership among all educators and a commitment to extending access to leadership initiatives across all educator groups.

**School Climate**

School climate is an important component of school success mentioned often throughout ESSA. It is an area with which School Psychologists can assist on many levels.  ESSA mentions several ways to improve school climate that focus on enhancing safety and the level of security that is employed in schools.  School Psychologists are a vital component to this effort as we have specific training to utilize researched, evidence-based practices that are proven to enhance school climate.  School Psychologists are able to deliver early intervention and preventative tools that incorporate school climate, including functional behavioral assessments, behavior interventions plans, individual and group counseling, bully prevention programs, suicide preventions programs, risk assessments, crisis plans, individual and school-wide crisis debriefing, interventions for improving social-emotional and overall well-being, and trauma informed care.

Delaware’s ESSA draft mentions the need for “developing a positive school climate… as an indicator of school quality and improvement in teacher recruitment and retention.”  School Psychologists advocate for a positive school climate for students and educators by sharing intervention strategies and techniques with other school professionals.  School Psychologists may act as coaches in our areas of specialization to not only maintain current school climate improvement strategies but also promote overall school safety and wellness.

Another area that has a direct impact on school climate is around the area of “Chronic Absenteeism.”  As student success is largely impacted by student attendance, I advocate for stronger absenteeism procedures in an effort to improve student growth and success.   Stronger absenteeism procedures may include better tracking systems that look at both excused and unexcused absences, reporting of local schools attendance rates for public knowledge, sharing best practices with students, educators, and families, inclusion of attendance in relation to a better school climate, and assistance from outside agencies and community members in promoting highly enforced attendance rates.

Finally, in order to improve and provide school climate practices, focus on the ratio of SISPs (which includes School Psychologists) to students must be a priority in the state of Delaware.  It is hoped that by increasing the number of School Psychologists, we will be given the time to utilize off of our unique and extensively trained skill sets in order to support school climate.

**Collaboration with Outside Agencies and Mental Health Service Delivery**

School Psychologists are defined in the federal ESSA plan as School-Based Mental Health Service Providers. As such, we are highly trained in collaborating and consulting with outside service agencies, including but not limited to counseling service providers, mental health agencies, medical facilities, psychological and psychiatric services, family agencies, social services, and law agencies. We have the ability to coordinate and/or facilitate wraparound services in order to ensure continuity of care for students and families. School Psychologists would like to continue these efforts by establishing stronger relationships with outside, mental health agencies to deliver better services and interventions on an individual basis.

In Delaware’s draft of ESSA, there is mention of the importance of providing mental health services to students. While mental health providers play an important role in student success there is little mention of the school building professionals that are also capable of performing such duties. School Psychologists are not only able to provide mental health services as School-Based Mental Health Service Providers but we also work closely with outside, mental health providers. School Psychologists maintain relationships with outside mental health agencies and ensure service delivery that is consistent across the school, home, and community settings to allow for student growth, independence, and a positive view of self.  School Psychologists are able to provide preventive intervention strategies in collaboration with outside agencies in hopes of increasing student self-regulatory strategies, coping skills, and independent living skills necessary when transitioning to adulthood.  By providing these intervention strategies early on in conjunction with outside, mental health services School Psychologists may assist students and educators in teaching and self-managing mental health concerns that are observed throughout the lifespan.

In conclusion, I am very appreciative of the Delaware Department of Education’s inclusion of School Psychologists in the Framework Document as this recognizes the critical role that we play in student success. I extend my gratitude to the Department for the dedication to soliciting and compiling input from various stakeholders, community members, and educators across the state. I look forward to working with the state education department in promoting and providing safe and healthy environments for all children.

Sincerely,

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