

**January 21, 2016**

**Implementing Programs under Title I of the Every Student Succeeds Act**

**Docket ID:** ED-2015-OESE-0130

**Agency:** Department of Education (ED)

**Comments:** Beth Matthey, President of the National Association of School Nurses

Passage of the Every Student Succeeds Act (ESSA) provides opportunities for state, district and school levels to optimize learning of all students. The National Association of School Nurses (NASN) applauds the law's acknowledgement of the roles of specialized instructional support personnel in supporting student success. NASN offers the following comments.

**Page 35** - “(v)(I) For all public schools in the State, not less than one indicator of school quality or student success that “(II) For purposes of subclause (I), the State may include measures of...

“(VII) school climate and safety; and “(VIII) any other indicator the State chooses that meets the requirements of this clause.” NASN believes states and local schools need guidance on what school quality indicators in nonacademic measures, such as school climate and safety, would entail and to weave them into a comprehensive and integrated approach to supports for student learning.

**Page 39** - “(B) TARGETED SUPPORT AND IMPROVEMENT PLAN – school level targeted support and improvement plan development for subgroups requires guidance **and technical assistance** from ED to include student (academic and nonacademic), family and school factors to improve student outcomes.

**Page 62** - “(b) SCHOOLWIDE PROGRAM PLAN – guidance and technical assistance to schools will help in the development of comprehensive plans that involve members of the school and great community as well as parents.

**Page 67-68** – Parent and Family Engagement – guidance from ED can provide examples of shared responsibility (families and schools) for student outcomes and to encourage two-way conversations between families and school staff). **State and local education agencies need guidance on the critical role of interprofessional professional development for school leaders, specialized instructional support personnel (including school nurses), early childhood educators and parents and families.**