



National
Association of
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John B. King, Jr.
Secretary
United States Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Secretary King:

The National Association of School Nurses (NASN) appreciates the opportunity to provide comments regarding implementation of the Every Student Succeeds Act (ESSA) Title IV (A). NASN represents over 16,000 school nurses who enable student academic success of students by making sure they are healthy, safe, and ready to learn. Today, children and youth face chronic and complex health and mental health conditions like never before. School nurses coordinate care for health conditions and serve as liaisons to school communities including parents and to healthcare providers, and community-based resources. In addition, school nurses promote wellness and improve health outcomes for our nation's children. Below are aspects of Title IV for which NASN suggests guidance from the Department.

Specialized Instructional Support Personnel – school located expertise on evidence-based programs

NASN is pleased that the term “specialized instructional support personnel” (SISP) was codified in the new law (defined in Title VIII SEC. 8002 (47)). SISP reduce barriers to learning and help children achieve their academic potential. As a SISP, school nursing is the basic infrastructure for the health of students in school and provide a critical link between student health and learning. NASN was pleased that “chronic disease management led by school nurses” was specifically called out in ESSA Title IV (A). The health of the student is paramount in their performance at school, and a school nurse on campus ensures that children's complex medical conditions can be managed in a way that minimizes absences and maximizes class and instruction time. *We request the Department to provide guidance to state and local education agencies related to the expertise SISP provide on evidence-based programs at the district and school levels.*

Local Needs Assessments – include SISP

ESSA *explicitly requires* consultation with specialized instructional support personnel in the development of Title I state and local education agency plans, as well as Title IV plans and needs assessments. SISP are further to be included in the development of school-wide programs, targeted assistance and integrated student supports within the school and coordinated with the community. Each group represented within SISP bring a unique perspective when viewing the “whole child” and must be included when assessing community needs and developing plans.

While we celebrate aspects of ESSA, we recognize that the many components to the law in various sections create fragmentation and confusion, particularly concerning SISP and the important role of SISP in

optimizing student performance. **We would like to suggest the USDOE recommend states and LEAs adopt the [Whole School, Whole Community, Whole Child Model](#), (WSCC) developed by ASCD and the CDC. This model brings a structure and focus to the support services needed to address the “whole child”. The ten components within the framework encompass the recommendations throughout ESSA, and the inclusion of the community in WSCC brings additional supports as recommended in ESSA.**

The Department asks for best practices to increase the number of quality school personnel available to address equity of services, to properly identify students in need, to provide classroom-based and school-wide interventions, and to make appropriate referrals for more intensive services. With the guidance to use the WSCC model from the Department, schools would be better informed of the long-term value of SISIP to create equity for students and less inclined to cut or eliminate these important comprehensive services. Suggested needs assessment tools:

- [ASCD School Improvement Tool](#)
- [CDC School Health Index](#)
- Check with local nonprofit hospitals that are required to conduct community needs assessments every three years. Schools can leverage community benefits from hospitals to support school health programs and services.

As active members of the school community providing health services as shown in the WSCC model, school nurses coordinate and collaborate with all members of the team: teachers, paraprofessionals, administrators, other SISIP, families, and community-based professionals to provide the social, emotional, physical health, and mental health supports necessary for a positive school climate and improved student success. School nurses often are the first to recognize mental health concerns when a student presents with physical symptoms.

School nurses are integral to providing specific services to individual students and groups of students, often working with families as well. Meaningful and on-going collaboration with school nurses regarding the development and implementation of state and local plans is critical and should be viewed as an effective strategy to school success. **NASN asks that the Department include school nurses along with teachers, principals, parents, superintendents, and others, to provide guidance and technical assistance regarding the expectations of and best practices related to effective stakeholder engagement and meaningful and on-going collaboration.**

If the Department issues guidance or technical assistance regarding best practices in school improvement efforts, it is imperative that the critical contribution of school nurses be explicitly included. Specific examples include the following:

- **Physical Health and Wellness.** Health (mental and physical) and learning are linked. As schools examine the needs of children to determine how they can improve academic success, researchers show an inextricable link between a child's physical, emotional, and

mental health and his or her academic outcomes. School nurses identify and provide care for students with acute and chronic healthcare needs; support student health screenings, including vision and hearing screenings; and connect students and families to community resources. Children need to acquire the knowledge and skills necessary to make healthy choices and to move beyond health barriers to learning and academic success. Schools are increasingly looked upon as institutions that can play a critical role in improving the health status of our nation's youth. School nurses provide chronic disease management for specific students and health promoting instruction and activities for entire student populations. [See this example in Albuquerque.](#)

- **Bullying Prevention.** School nurses focus on health and safety of all students including students who are bullied or students who both bully and are bullied by others. Children with physical, developmental, intellectual, emotional, and sensory disabilities are more likely to be bullied than their peers. Bullying can have serious and often long-term consequences for both the student who bullies and the student who is bullied including increased school absenteeism, diminished educational achievement, behavior issues, low self-esteem, sleep deprivation, depression, anxiety, and self-harm. Often it is a school nurse who recognizes the signs that a child may be bullied or is bullying. This knowledge that school nurses add to school team discussions is vital. School nurses and SIS support evidence-based interventions to prevent and mitigate bullying in the school. [See this example in Delaware.](#)

ESSA allows Title II funds to be used to help recruit, develop, and retain teachers and school leaders. Certainly, recruiting and retaining high quality teachers and principals is critical. School nurses are health leaders in schools and their presence releases teachers and principals to fully devote time to educating children. A school nurse in the building saves teachers almost 20 minutes a day and saves the principal almost an hour a day. ***NASN requests that the Department clarify that LEAs can use these funds to recruit, develop, and retain school nurses to help meet school's improvement goals.***

Thank you for the opportunity to contribute to the conversation and give input to the Department surrounding the Every Student Succeeds Act (ESSA). We stand ready to offer additional assistance as needed.

Sincerely,

Beth

Beth Matthey
President