



August 18, 2025
U.S. Department of Education
400 Maryland Avenue SW Room 48210
Washington, DC 20202

Re: Comments to the Department of Education in response to School-Based Mental Health Services Grant Program; Docket ED-2025-OESE-0152

Submitted electronically via regulations.gov

The National Association of Social Workers (NASW) appreciates the opportunity to comment in response to the Department of Education's (DOE) Proposed Rule change to the School-Based Mental Health Services Grant Program (SBMH).

Founded in 1955, NASW is the largest membership organization of professional social workers in the United States. NASW works to enhance the professional growth and development of members, to create and maintain professional standards for social workers, and to advance sound social policies. The *Practice Standards for School Social Workers* were published by NASW and over 6,000 NASW members are school social workers (SSWs).

NASW supports efforts to increase the number of school-based mental health providers in the education system. However, NASW is deeply concerned that the SBHM grant no longer allows local educational agencies (LEAs) and state educational agencies (SEAs) to utilize grant funds for SSW services. The current proposal only prioritizes school psychologists, which limits access to services provided by other mental health professionals, like SSWs.

Recommendation

NASW recommends the DOE broaden the definition of eligible mental health professionals to include SSWs for the following reasons:

1. School social workers are school-based mental health providers.

SSWs have a long history providing mental health services in the education system. Sec. 4102 of the Every Student Succeeds Act (ESSA) defines school-based mental health



providers as SSWs, school counselors, school psychologists, and other credentialed mental health professionals.

“(6) SCHOOL-BASED MENTAL HEALTH SERVICES PROVIDER.— The term ‘school-based mental health services provider’ includes a State-licensed or State-certified school counselor, school psychologist, school social worker, or other State licensed or certified mental health professional qualified under State law to provide mental health services to children and adolescents.”¹

SSWs provide prevention and early intervention services that promote student mental health and academic success. Their role includes crisis management, group and individual counseling, behavior management, community referrals, violence and bullying prevention and emergency preparedness. SSWs accomplish this work through evidenced based Multitier Interventions.² Tier 1 is the implementation of school-wide prevention services that target the entire school community. Tier 2 is the implementation of short-term interventions intended to address specific behaviors or challenges that impact students. Tier 3 is the implementation of individualized and long-term support when Tier 1 and Tier 2 interventions do not yield desired outcomes. Through Tier 3 interventions, SSWs coordinate more intensive support and/or special education services for students needing specialized interventions.

SSWs complete assessments and interventions that directly impact student mental health and foster a healthy school environment that is better for students, families, and other educational personnel. In compliance with ESSA guidance, from Sec. 4108. *Activities to Support Safe and Healthy Students*, SSWs identify mental health symptoms and offer appropriate support to develop healthy students.³ Grant funding and federal policies, like SBMH, should ensure SSW services are available to schools.

¹ Every Student Succeeds Act. (2015, December 10). Retrieved from CONGRESS.GOV: <https://www.congress.gov/bill/114th-congress/senate-bill/1177/text>

² National Association of Social Workers. (2025). Practice Standards for School Social Workers. Retrieved from <https://www.socialworkers.org/Practice/NASW-Practice-Standards-Guidelines/NASW-Standards-for-School-Social-Work-Services>

³ Congress.gov (See footnote 1)

2. In previous fiscal years, local and state educational agencies requested school-based mental health grants to fund school social work services.

Multiple LEAs and SEAs included SSW services in their plans to address student mental health needs during prior fiscal years.⁴ Awardees proposed comprehensive plans to do the following:

a) Increase student access to mental health support.

SSWs were hired to support the social, emotional and behavioral health needs of students and to provide trauma informed training for educational personnel. When applicable, remote services were offered to assist families with transportation barriers to accessing services.

b) Reduce student: provider ratios.

Some agencies reported ratios of over 1,000 students per mental health professional. High caseloads, limit the number of students that can access services and contribute to provider burnout and turnover. Multiple agencies desired to bring their provider ratios to national recommended standards by hiring more mental health professionals.

c) Recruit and retain SSWs.

Agencies used funds for retention and recruitment initiatives to attract SSWs. Awardees partnered with local universities to recruit interns, including paid internships. Other strategies were aimed at meeting specific needs such as hiring bilingual providers and increasing recruitment of providers from underrepresented groups. Agencies invested in professional development opportunities, and some schools hired licensed SSWs to provide supervision.

The primary objective for grant recipients was to promote the mental well-being of students. Several agencies acknowledged that achieving their goals for students and their families required the involvement of SSWs. The SBMH grant was an opportunity for agencies to utilize SSW services and to tackle barriers to hiring and retaining professionals.

⁴ U.S. Department of Education. (n.d.). School-Based Mental Health Services Grant Program. Retrieved from [www.ed.gov: https://www.ed.gov/grants-and-programs/grants-birth-grade-12/safe-and-supportive-schools/school-based-mental-health-services-grant-program](https://www.ed.gov/grants-and-programs/grants-birth-grade-12/safe-and-supportive-schools/school-based-mental-health-services-grant-program)

3. Excluding school social workers negatively impacts students and their schools.

Addressing mental health within the education system is a key prevention strategy, and it's essential to support families by meeting them where they are. However, around 14 million children in America are enrolled in schools that lack any mental health professionals, such as counselors, nurses, psychologists, or social workers.⁵ This shortage is concerning, as SSWs play a vital role in improving mental health care. SSW shortages can negatively impact the overall wellbeing and climate of school communities.

Discounting SSW services from SBMH grants disrupts the education system's ability to support student mental health and students may lose access to some services when the scope of the SBMH grant is limited to school psychologists. Schools depend on SSWs, and SBMH grants provide essential funding to support their recruitment, training, and retention.

4. Student mental health support requires multi-disciplinary collaboration.

There are many challenges facing school communities, given the current youth mental health crisis. For youth 10-24 years old, suicide is the second leading cause of death and there has been an increase in mental health related emergency room visits.⁶ In addition, societal factors such substance use, homelessness and school gun violence impact schools and require multi-disciplinary approaches. School counselors, school psychologists, SSWs, and other qualified professionals, such as school nurses and school based occupational therapists are considered Specialized Instructional Support Personnel (SISP).⁷ SISP collaborate as a robust team of providers to meet the needs of students and support the school community through specific services.⁸ School communities and student mental health needs are diverse and as much as possible the providers that serve these communities should come from diverse disciplines.

⁵ Leong, A., & Crouch, E. (2025). An Ounce of Prevention: Addressing Disparities in Child Well-being. New York: UNICEF USA.

⁶ American Academy of Pediatrics, American Academy of Child and Adolescent Psychiatry and Children's Hospital Association. (2021, 10 19). Retrieved from https://www.aap.org/en/advocacy/child-and-adolescent-healthy-mental-development/aap-aacap-cha-declaration-of-a-national-emergency-in-child-and-adolescent-mental-health/?srsltid=AfmBOorYbbUrhRwRXd2p0ugUjmw50blEsoiKSTNOklmMxyLli_i1qeM

⁷ Congress.gov (See footnote 1)

⁸ NASISP. (2024). The Role of Specialized Instructional Support Personnel In School and Student Success. National Alliance of Specialized Instructional Support Personnel (NASISP). Retrieved from <https://nasisp.org/wp-content/uploads/2024/04/SISP-Guidance-Brief.pdf>



NASW advocates for the inclusion of SSWs in the provision of grant funds as a larger part of a healthy school environment. SSWs are tasked with creating healthy school climates where students thrive and succeed academically. School systems recognize the value of SSW and agencies should have the option to utilize SBMH grants for their services. The education system benefits from student mental health services provided through collaboration with SSWs, counselors, psychologists, and other SISP providers.

Thank you for your consideration of NASW's comments. Please contact me at BBedney.nasw@socialworkers.org if you need additional information.

Sincerely

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