

February 2, 2015

The Honorable Lamar Alexander
Chairman
Senate HELP Committee
Washington, DC 20510

The Honorable Patty Murray
Ranking Member
Senate HELP Committee
Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray:

We thank you for your efforts in making the reauthorization of the Elementary and Secondary Education Act a priority of the HELP Committee for the 114th Congress, and we thank you for the opportunity to provide comments on Senator Alexander's discussion draft. We hope that this is the first step toward achieving a comprehensive and bi-partisan bill that will ensure all children and youth have access to the supports they need to be successful in school and in life.

The undersigned organizations represent a wide group of stakeholders who have in common their opposition to the proposed block granting of currently authorized programs in Title IV. The proposed purpose of this Title is to 1) increase the capacity of schools and communities to create safe, healthy, supportive, and drug-free environments; 2) improve school safety and promote students' physical and mental health well-being; 3) prevent and reduce substance abuse, school violence, and bullying; and 4) strengthen parent and community engagement to ensure safe, healthy, and supportive school environments. We applaud your recognition of the key relationship between student well-being, school safety, and academic achievement. High quality teachers and effective school principals are certainly critical to student success, but students will not thrive if their physical and psychological needs are not supported in the school environment.

We recognize the specific needs of each community may differ, and we appreciate the requirement of a needs assessment to ensure states, school districts, and schools are using these funds to address specific areas in need of improvement. However, no guidance is given to states on what specific indicators must be included in a needs assessment, and we believe far too much flexibility with little accountability is given to states and districts in using these critical funds. We believe the consolidation and elimination of these vital programs will result in the unintended consequence of preventing children from having access to a diverse range of supports necessary to succeed. State and school districts are often forced to make tough budgetary decisions, and far too often, programs and services to support the physical and psychological well-being of students, reduce school violence and improve overall school safety are the first to be cut. Converting Title IV into a block grant will result in a competition among programs that ultimately will decrease services to children. No school district should have to choose between offering professional development in emergency preparedness and crisis response and improving the availability of school mental health services. Federal investment in dedicated funding streams for programs such as the Elementary and Secondary School Counseling Program, Safe and Drug Free

Schools and Communities, and the Carol M. White Physical Education Program have ensured many schools do not have to make this difficult decision. The elimination of small, yet vital programs is not new. However, we urge you to follow the intentions of the 112th and 113th Congressional HELP Committee and set specific allocations for drug and violence prevention, programs to promote mental health, and programs to promote physical education, fitness, and nutrition.

In 2011 by a vote of 15-7 (Senators Alexander, Enzi, and Kirk in favor), the Elementary and Secondary Education Reauthorization Act of 2011 was reported favorably out of the HELP Committee. This bill did consolidate several programs into a larger 'Safe, Successful, and Healthy Students' grant. However, the priorities of the smaller specific programs were maintained as states awarded funds under this grant were required to conduct a needs analysis of conditions for learning that included data on physical health indicators, mental health indicators, and data on violence and drug related offenses. Based on this needs assessment, states were to implement *comprehensive* plans to meet the needs of LEAs. However, the legislative language mandated LEAs receiving subgrants from the State spend no less than 20% of funds on programs specific to physical activity, physical education, and nutrition. Language contained in the corresponding Committee report highlights the committee's intention for these funds to be used to promote student physical and mental health, improve school safety and climate, and reduce violence, yet no dedicated funding streams were set aside for these critical components of student learning.

In 2013 the Strengthening America's Schools Act (SASA) was passed out of committee. Title IV, Part D, Safe, Successful, Healthy Students, did eliminate specific programmatic authorizations; however, unlike the Elementary and Secondary Education Reauthorization Act of 2011, SASA contained more specific directives to states and districts that received funds under this grant. These directives maintained the specific priorities of the consolidated grants by defining key elements of programs intended to address physical health, mental health, and drug use and violence prevention. This bill also required the data collection and reporting on indicators of school safety, school climate, physical health, mental health, rates of suspension and expulsion, as well data regarding the student to staff ratio of school counselors, school psychologists, school social workers (key component of ESSCP). Individual priorities were also maintained by specifying allocations for states to use when awarding subgrants to LEAs. For the aggregate of all subgrants, no less than 20% of funds was designated for drug and violence prevention, not less than 20 % of subgrant funds for programs to promote mental health, and not less than 20 percent of funds for programs to promote physical activity, education, fitness, and nutrition.

We appreciate the difficulty of balancing state and local flexibility with federal priorities and mandates. However, we believe that allocating a specific set aside for the aforementioned priorities does promote state flexibility, while still preserving specific priorities and ensuring states are helping districts provide a wide range of support services necessary for student success.

Sincerely,

American Federation of Teachers
American Council for School Social Work
American Counseling Association

American Dance Therapy Association
American Music Therapy Association
American Occupational Therapy Association
American Psychological Association
American School Counselor Association
Association of School Business Officials International (ASBO)
First Focus Campaign for Children
National Association of Elementary School Principals
National Association of School Psychologists
National Association of Secondary School Principals
National Association of Social Workers
National PTA
School Social Work Association of America