



January 21, 2016

The Honorable John King
Acting U.S. Secretary of Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

RE: Docket ID ED-2015-OESE-0130: Implementing Programs Under Title I of the Elementary and Secondary Education Act

Dear Acting Secretary King:

The undersigned members of the National Alliance of Specialized Instructional Support Personnel (NASISP) appreciate the opportunity to provide recommendations to the U.S. Department of Education (ED) for the implementation of programs under Title I of the Every Student Succeeds Act (ESSA).

NASISP is a coalition of national professional organizations whose members provide and support a variety of school-based prevention, early identification, and intervention services that remove barriers to learning and assist students in becoming effective learners and productive citizens. Our organizations represent over a million professionals, including school counselors, school nurses, psychologists, school psychologists, social workers and school social workers; occupational and physical therapists; art, dance/movement, and music therapists; and, speech-language pathologists, and audiologists. The major national organizations representing general and special education teachers and student support administrators are also coalition members.

We are pleased that this new authorization of the Elementary and Secondary Education Act (ESEA) includes the updated term “specialized instructional support personnel” (SISP) and uses this term deliberately and strategically throughout the Act. The same school professionals referred to in the Individuals with Disabilities Education Act (IDEA) as “related services” personnel, previously referred to in ESEA as “pupil services personnel,” are now more accurately described as SISP. The term SISP better recognizes the value of these professionals and the specialized instructional support services they provide in our nation’s schools. SISP are specially trained to address barriers to teaching and learning, promote improved education outcomes in the classroom and school environment, and help strengthen a positive and supportive school culture and climate.

The 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 included in the development of schoolwide programs, targeted assistance and integrated student supports within the school and coordinated with the community.

Sec. 1111(a)(1) State Plans

Sec. 1111(a)(3)(ii)(I) Peer Review & Secretarial Approval

Sec. 1112 (a)(1)(A) Local Educational Agency Plans

Sec.1008 Schoolwide Programs, Schoolwide Program Plan

Sec.1009 Targeted Assistance School, (b) Program

Sec.1010 Parent & Family Engagement, (D)(i)

Sec 1112(b)(11)

Sec. 1113 (e)(2)(B)

Sec.1401 Part D, Prevention & Intervention Programs for Children & Youth Who Are Neglected, Delinquent, Or At-Risk,

As active members of the school community, specialized instructional support personnel coordinate and collaborate with teachers, paraprofessionals, administrators, families, and community-based professionals to provide the academic, behavioral, social, emotional, physical health, and mental health supports necessary for a positive school climate and improved student success. SISP are integral to implementing school-wide initiatives such as multi-tiered systems of supports, preventative discipline policies, positive behavior interventions and supports, social emotional learning programs, college and career planning, and violence and bullying prevention -- all of which contribute to students' readiness to learn.

Input from SISP into the development and implementation of State and local plans and as part of the peer review process is critical. Since SISP provide direct services to students and consultative services to other staff members, their input is necessary to ensure the local district plan adequately addresses how these services will be provided. SISP are the personnel specifically trained to work on improving school climate, addressing barriers to teaching and learning, and can provide ongoing professional development for other staff on developing and implementing prevention programs and crisis intervention. We request that any Department guidance reinforce what is already required in statute: that these personnel must be included from the outset in developing plans and programs, contributing their expertise to ensure funds are wisely invested and address the goals of increasing the academic achievement of all students.

We further request that the Department offer guidance for LEAs and SEAs on the critical role of SISP in the implementation of evidence-based practices that utilize a multidisciplinary team to promote

improved academic and lifelong outcomes for our students. SISP improve the coordination and collaboration among educators and families to serve *all* students. NASISP believes that guidance from the Department could better reflect the important role of SISP in school communities and encourage practices that recognize our unique professional contributions to student and school success.

Best practices support an adequate number of qualified school personnel available to address service disparities, to properly identify students in need, to provide classroom-based and school-wide interventions, and to make appropriate referrals for more intensive services. However, when budgets are tight, staffing choices are made. With clear guidance from the Department, schools would be better informed of the long-term value of SISP, have a deeper understanding of how best to engage SISP for the benefit of all students, and less inclined to cut or eliminate these important services.

NASISP members welcome the opportunity to engage the Department in further discussions on how SISP recognition could be integrated into guidance and other documents. We would be able to provide specific suggested language and usage areas. For more information on NASISP and the work of SISP, please contact the co-chairs or refer to www.nasisp.org.

Thank you for the opportunity to comment on the development of these regulations. We look forward to additional discussion of how we can assist your Department in guiding states and local school districts.

Signed,

American Art Therapy Association
American Counseling Association
American Council for School Social Work
American Dance Therapy Association
American Federation of Teachers
American Music Therapy Association
American Occupational Therapy Association
American Psychological Association
American Physical Therapy Association
American School Counselor Association
American Speech-Language-Hearing Association
Council for Exceptional Children
International Association of Pupil Personnel Workers
National Association for College Admission Counseling
National Association of Pupil Services Administrators
National Association of School Nurses
National Association of School Psychologists
National Association of Social Workers
National Association of State Directors of Special Education
National Education Association
School Social Work Association of America

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