



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 Mental Health Service Professional Demonstration Grant Program; Docket ID ED-2025-OESE-0153

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 Mental Health Service Professional Demonstration Grant Program (MHSP).

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 through partnerships with institutions of higher education (IHE). However, the current proposal only prioritizes school psychologists and excludes IHE as grant applicants.

Recommendation

For the following reasons, NASW recommends that the DOE

- a. Broaden the definition of eligible mental health professionals to include SSWs.
- b. Permit university applicants.

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 and school psychologists.

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

“(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 MHSP, should ensure SSW services are available to schools.

2. 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.⁴ In addition, societal factors, such substance use, homelessness and school gun violence impact

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)

⁴ 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=AfmBOorYbbUrhRwRXd2p0ugUjmw50bIEsoiKSTNOklmMxyLli_i1qeM

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).⁵ SISP collaborate as a robust team of providers to meet the needs of students and support the school community through specific services.⁶ 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.

3. Graduate-level social work education prepares individuals to enter the field as school-based mental health providers.

Partnering with graduate schools of social work creates a pipeline of graduate professionals prepared to serve in high need local education agencies LEAs. University partnerships create opportunities for field placements within the education system and Master of Social Work (MSW) candidates benefit from hands-on experience prior to employment. In addition, an MSW is the preferred entry level qualification for SSW.⁷ The MSW curriculum covers core competencies that prepare students for work in education. Several essential elements of the core competencies include engaging, assessing, intervening and evaluating individuals, families, groups and organizations and demonstrating ethical and professional behaviors.⁸ These skills are applicable and critical to school based mental health.

4. Permitting higher education institutions to serve as applicants can ease administrative challenges for schools.

There is an administrative burden associated with the management and application of MHSP grants. A partnership with universities shifts some responsibilities from under-resourced LEAs to their partners. This collaboration is vital to training and placing SSWs in high needs LEAs and is a benefit to the education system.

NASW applauds the goal of the MHSP grant to increase the number of school-based mental health providers. NASW strongly recommends including the social work profession

⁵ Congress.gov (See footnote 1)

⁶ 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>

⁷ National Association of Social Workers. (2025). See footnote 2

⁸ The Council on Social Work Education. (2022). Educational Policy and Accreditation Standards. Retrieved from [https://www.cswe.org/getmedia/bb5d8afe-7680-42dc-a332-a6e6103f4998/2022-Educational-Policy-and-Accreditation-Standards-\(EPAS\).pdf](https://www.cswe.org/getmedia/bb5d8afe-7680-42dc-a332-a6e6103f4998/2022-Educational-Policy-and-Accreditation-Standards-(EPAS).pdf)



as mental health providers and allowing university applicants. School systems recognize the value of SSW and agencies should have the option to utilize MSHP grants for their services. The education system is strengthened by student mental health services that are supported through collaboration with SSWs, other SISP providers, and universities.

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

Sincerely

Barbara Bedney

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