

September 1, 2022

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U.S. Department of Education
400 Maryland Avenue, SW Room 3E244
Washington, DC 20202

RE: Docket ID ED-2022-OESE-0094

On behalf of Knowledge Alliance (KA), the following comments are provided in response to the Notice of Proposed Priorities, Requirements, and Definitions for the Mental Health Service Professional (MHSP) Demonstration Grant Program published by the U.S. Department of Education (ED or the Department) on August 2, 2022. Knowledge Alliance, a non-profit, non-partisan organization, is comprised of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation and innovation in education policy and practice at all levels. Collectively, we promote the use of rigorous research to figure out “what works,” and why, to improve student outcomes and then share those findings with policymakers, practitioners and the general public.

KA’s 19 members work across the nation generating research and evidence on how to best support students and educators. Our members understand the severity of the current youth mental health crisis as well as the evidence-based practices needed to increase the number of mental health professionals in schools. KA recently released an [issue brief](#) on evidence-based resources to address the educator shortage and highlighted efforts to recognize, support and address the mental health of school staff. For example:

- Through a collaboration between the Center to Improve Social and Emotional Learning and School Safety, REL West and the Region 15 Comprehensive Center, both led by WestEd, produced a [webinar series](#) that offered practical information and guidance backed by research to help school staff cope with the stresses of school closures, of service provision and of quarantine due to the COVID-19 pandemic.
- REL Appalachia at SRI hosted a three-part [webinar](#) series on addressing trauma in educational settings. The series included information on strategies for helping educators recognize and process “vicarious trauma” and on strategies for self-care.
- Cognia’s [MyVoice](#) is a real-time culture-monitoring platform leveraging research-based drivers and indicators of school culture to provide point-in-time ratings and indicators of progress to foster collaboration and develop a schoolwide commitment to improvement. MyVoice identifies school culture drivers and school culture indicators.

KA is pleased by Congress’ recent investments in addressing youth mental health challenges. We are particularly supportive of the nearly \$300 million investment being made to expand access to mental health services in schools through the MHSP Demonstration Grant Program and the School Based Mental Health (SBMH) Services Grant Program. We urge ED to prioritize in both programs the use of evidence-based practices in strengthening the mental health professional pipeline by explicitly requesting eligible applicants incorporate evidence-based practices and evaluation in their programs.

The following comments include specific requests surrounding the Proposed Priorities, Requirements and Definitions in the **MHSP Demonstration Grant Program**:

Proposed Priority 3 – Promote Inclusive Practices

KA strongly supports proposed priority 3 to promote inclusive practices in mental health services provider preparation programs in order for school-based mental health services providers to offer the most inclusive services possible. We urge ED to require the use of evidence-based pedagogical practices in order to ensure that school-based mental health services providers are receiving the highest quality training to consequently provide students with high quality service. We urge ED to include the language in red in the priority.

*Projects that propose to provide **evidence-based** pedagogical practices in mental health services provider preparation programs or professional development programs that are inclusive with regard to race, ethnicity, culture, language, disability, and for students who identify as LGBTQI+, and that prepare school-based mental health services providers to create culturally and linguistically inclusive and identity-safe environments for students when providing services.*

Application Requirement (e)(2): A plan for collaboration and coordination with related Federal, State, and local initiatives.

We ask that in requirement (e)(2) of the proposed program requirements, ED include Regional Educational Laboratories (RELs) and Comprehensive Centers (CCs) as examples of community agencies. RELs and CCs are both invaluable federally funded programs that generate evidence-based strategies and provide technical assistance to meet the needs of State educational agencies (SEAs) and local educational agencies (LEAs). Notably, RELs and CCs have been at the forefront of addressing the educator shortage for many years. ED should explicitly name RELs and CCs in requirement (e)(2) of the MHSP Demonstration Grant Program to ensure that all partnerships between high-need LEAs and institutes of higher education (IHEs) are effective and based on evidence. We have provided the language below with edits in red:

*(2) The activities to be carried out in coordination with regional and local mental health, public health, child welfare, and other community agencies, which may include **federally funded Regional Educational Laboratories and Comprehensive Centers as well as** school-based health centers, to achieve the plan goals and objectives of establishing a pipeline program to train and expand the capacity of school-based mental health services providers in high-need LEAs*

New Application Requirement (g) on Evaluation

In order to ensure that high-quality school-based mental health services providers are working in our nation's schools, MHSP Demonstration Grant Program grantees should be required to continuously monitor and evaluate their outcomes, and use data to make improvements when needed. KA strongly believes that consistent evaluation, planned at the outset of a grant award, is required to ensure that programs are as effective and equitable as possible. We propose that ED incorporate the following language as application requirement (g):

(g) Plan for continuous evaluation of effectiveness and improvement

Applicants must describe how they will periodically evaluate grant funded activities for effectiveness and provide a plan for improvements, based off the evaluation data, when necessary. ED strongly encourages applicants to partner with research or evaluation organizations to complete this requirement.

Inclusion of “Evidence-Based” Definition

Pending the addition of “evidence-based” in priority 3, we believe it would be apt to include the definition of “evidence-based” as ascribed to it in section 8101(21) of the Elementary and Secondary Education Act (ESEA). We have provided this definition below in red.

“The term “evidence-based,” when used with respect to a State, local educational agency,

or school activity, means an activity, strategy, or intervention that —

- (i) Demonstrated a statistically significant effect on improving student outcomes or other relevant outcomes based on —**
 - (I) Strong evidence from at least 1 well-designed and well-implemented experimental study;**
 - (II) Moderate evidence from at least 1 well-designed and well-implemented quasi-experimental study; or**
 - (III) Promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias; or**
- (ii)**
 - (I) Demonstrated a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and**
 - (II) Includes ongoing efforts to examining the effects of such activity, strategy, or intervention”**

The inclusion of this definition would ensure that all partnerships through the MHSP Demonstration Grant Program would be based in evidence and therefore more likely to produce effective outcomes.

Thank you for the opportunity to comment on the proposed priorities and definitions. If you have questions, please do not hesitate to contact Rachel Dinkes at rdinkes@knowledgeall.net.

Best,



Rachel Dinkes, President