

Response to Public Comments Received During the 30-day Comment Period

July 2021

School Pulse Panel Preliminary Activities

ED-2021-SCC-0087

Comments on FR Doc # 2021-12298

NCES and the staff of the School Pulse Survey want to thank all public commenters for your feedback responding to a request for comments on the School Pulse Panel Preliminary Activities published in the Federal Register. The National Center for Education Statistics (NCES) appreciates your interest in our work. The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment and hope that you will continue to follow our work.

Submitter Information

Name: Ji Soo Song

Organization: International Society for Technology in Education

Comment

The International Society for Technology in Education (ISTE) is a nonprofit organization that works with the education community to accelerate the use of technology to solve tough problems and inspire innovation. In response to the U.S. Department of Education’s request for comments on the School Pulse Panel, ISTE submits the following recommendations on question four, “How might the Department enhance the quality, utility, and clarity of the information to be collected?” For questions about ISTE or our comment, please reach out to Ji Soo Song, ISTE’s Senior Policy Advisor, at jssong@iste.org.

Educators and leaders around the country continue to face critical challenges highlighted by COVID-19, including providing equitable and effective learning opportunities for all students and countering interrupted learning using new strategies. Fueled by the need for emergency online learning during the height of the pandemic and consequent expansion of technology-enabled learning models, schools around the country have begun adopting digital tools at unprecedented rates. This creates a new set of challenges around educator capacity — preparing educators who use those technologies for learning. For example, recent national surveys show that educators continue needing support on using technology for student engagement, parent and caregiver involvement, social-emotional learning, and curriculum adaptation.

The NAEP 2021 School Survey falls short of addressing the educator capacity aspects of digital equity, thus far focusing primarily on instructional modality and internet access. The School Pulse Panel has an opportunity to improve from the NAEP 2021 School Survey by including questions on how schools are supporting educators as they implement digital learning over the next school year. Below, we include three ideas on how the proposed research questions from supporting statement part A could be adjusted accordingly.

Use of Technology, Computer Devices, and Internet Access

Currently, in the supporting statement, two questions are included under the topic

of “Use of technology, computer devices, and internet access” — “Are laptops or tablets offered and available to all students in the school to assist with virtual learning?” and “Was internet access provided to students?”

Measuring students’ engagement in effective technology-enabled learning solely through their access to devices and the internet is inadequate. Several state and district leaders featured in ISTE’s report, “From Crisis Management to Sustained Change: States Leading the Future of Learning with the ISTE Standards,” remarked that their commitment to digital equity lies on two parallel tracks — one that addresses access and another that builds educators’ capacities to use digital tools for learning. Furthermore, research shows that professional development opportunities for educators to learn about the effective use of technology differ by the income of the area where the school is situated.

The U.S. Department of Education must measure whether these gaps are being narrowed over the next school year, so that adequate investments can be made by leaders into educators’ professional development opportunities. ISTE recommends that the Department add the question, “Was professional development and/or coaching on digital learning provided to educators?” and use the Every Student Succeeds Act’s definition of “digital learning” (sec. 4102).

Federal Relief Fund Use

Currently, in the supporting statement, the following question is proposed — “How are American Rescue Plan funds being used to assist with...virtual learning?”

Over the past several months, U.S. schools have begun reopening their physical facilities. Alongside such reopenings, one-third of schools report plans to offer remote learning options after the pandemic, while others expect to greatly increase the role of technology in blended or face-to-face instruction. Therefore, to encompass the variety of instructional modalities schools will leverage over the next school year, ISTE recommends that the question be broadened to how the American Rescue Plan funds have been used to support digital learning (again, using ESSA’s definition of the term). This adjustment would better allow the U.S. Department of Education to measure the impact of the American Rescue Plan funds, specifically by keeping record of a diverse range of innovative learning strategies empowered through technology employed by schools.

Staffing

Currently, in the supporting statement, the following question is proposed — “As of the start of the 2021-22 school year, do you have any administrative staff, teacher, or support staff vacancies?”

Educational technology specialists and coaches have been one of the most critical roles that ensured learning can continue in spite of the pandemic. A report from Digital Promise indicates that these specialists and coaches “provided significant support to their school/district administrators in planning and ensuring learning continuity during school closures” and will continue to be important by providing professional development post-pandemic and facilitating educator collaboration. Furthermore, at a state roundtable conducted between ISTE, Central Michigan University, and the Michigan Department of Education, participants remarked that “Technology coaches and library/media specialists have been integral during COVID-19 and will continue to be so post-pandemic.” Therefore, ISTE recommends that the School Pulse Panel track data on where these critical roles remain vacant, so that appropriate investments can be made by leaders to provide educators with the peer support that they need.

As education leaders confront the fact that learning models outside of traditional, face-to-face programs may continue to expand, equity concerns also compound. The U.S. Department of Education has an opportunity to collect necessary data to ensure that equity concerns are made more apparent, and investments from the federal, state, and local levels can be made to continue narrowing those gaps.

Sincerely,

Ji Soo Song

Senior Policy Advisor

International Society for Technology in Education

RESPONSE:

Thank you for your feedback posted on July 2, 2021 responding to a 30-day request for comments on the proposed School Pulse Panel Preliminary Activities. The National Center for Education Statistics appreciates your interest in and support of the School Pulse Panel survey. I have provided a response to your comments below.

1. Thank you for providing your suggestion to ask questions about professional development for educators designed to build their capacity to use education technology. We agree that these topics could provide important information about the kind of learning experiences schools are offering students during the COVID-19 pandemic. As with all new items or topics proposed for inclusion in a questionnaire, we will need to conduct research and then develop and test new question items for principals and school leaders in K-12 schools to ensure correct comprehension and interpretation before including such items in a national (full-scale) collection.

At this point in the survey schedule, we are unable to accommodate additional testing for initial fall collections but will consider doing so for collections this winter or spring.

Per your helpful suggestion to ask about vacancies for technology specialists, we are drafting a response item to add to an already tested a question on vacancies for our fall collections.

2. Thank you for your suggestion to revise questions about how American Rescue Plan (ARP) funds have been used to support digital learning. We agree that a question about this topic could yield important information. However, after testing questions about funding in our survey with school-level staff we have decided to remove this line of questioning as school-level staff were not the appropriate responder to such questions. We feel that another collection would be a better venue for your suggested question: the Education Stabilization Fund-Elementary and Secondary School Emergency Relief Fund (ESSER I/ESSER II/ARP ESSER Fund) Recipient Data Collection Form (Agency/Docket number: ED-2021-SCC-0096). If you have not already done so, we encourage you to review the Federal Register notice for this collection which is inviting public comment through August 31, 2021.

As this is an ongoing survey, we encourage you to look for future OMB requests for comments on this collection. Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Rachel Hansen
Statistician, Project Director, School Pulse
National Center for Education Statistics (NCES)
U.S. Department of Education

Submitter Information

Submitter's Representative: jclark@dataqualitycampaign.org

Organization: Data Quality Campaign

Comment

The residual effects of COVID-19 will be felt for years. The School Pulse Survey is an opportunity for the federal government to act as a data leader and get timely information on the state of schools around the country to education stakeholders at all levels. To ensure this survey data collection is most useful, the Data Quality Campaign (DQC) recommends the following:

- Prioritize data that has value for stakeholders. This survey adds new burden for participants, so it will be important for NCES to ensure that the data collected is relevant to the questions policymakers are asking and the information they need to make decisions right now. NCES should consider getting input from educators and state leaders about what they need to know and types of data where monthly changes will most likely inform action.
- Ensure student outcomes are captured. The survey collection currently prioritizes data on opportunity to learn, attendance, staffing, and use of federal relief funds. As the survey evolves, NCES should include available measures of student achievement, which will be critical for understanding the inequitable impact of COVID-19 on students.
- Create or recirculate resources that help local leaders use the data. NCES should support participants' ability to analyze and use the data they are collecting to respond to the survey to inform local decision-making. This support may require creating new training modules and guidance, or republishing resources that already exist on the NCES blog. Data analysis by participants may uncover needs in access, staffing or services that, with support, provide opportunities to effectively target resources and improve outcomes.
- Provide ongoing financial investments to ensure future availability of quality data. Districts need resources to collect and submit quality data, and DQC was glad to see that there is a \$5,000 stipend for survey participants. However, long term recovery requires long term stability in education data, which means state data systems need broader investments to meet evolving demands. NCES should continue to look for opportunities to leverage existing grants to build capacity at the state and local level to leverage data systems for long term recovery. Additionally, NCES should continue to communicate to Congress about the need for more robust investments in state data infrastructure.

DQC appreciates the opportunity to comment on the School Pulse Survey and provide recommendations on the proposed frequency, usability, and type of data collected. DQC welcomes the opportunity to further discuss these topics.

Sincerely,
The Data Quality Campaign

RESPONSE:

Thank you for your feedback posted on July 12, 2021 responding to a 30-day request for comments on the proposed School Pulse Panel Preliminary Activities. The National Center for Education Statistics appreciates

your interest in and support of the School Pulse Panel survey. I have provided a response to your comments below.

1. We agree that it is important to prioritize data that has value for policy-making stakeholders. Federal level policy makers have had a chance to provide input as to the content of this survey. Resource constraints limit our ability to produce state- or local-level estimates with data from our collection, though we will seek out feedback from state and local policymakers about their content priorities to inform question development for future waves.
2. We agree that student outcomes could be a valuable addition to any federal collection. We are considering our options for future collections and will explore how we might append existing school-level outcome data that is available to use for analytical purposes.
3. NCES always aims to make its data usable for the public and for school staff. We intend to publish data through a frequently updated dashboard, which we are designing to be user friendly. To the extent possible, we can provide guidance for using this dashboard to view data. Due to resource constraints, local-level uses for this collection may be limited. However, we're working with program offices to use the data to target technical assistance needs.
4. Thank you for your comment about data infrastructure. We agree investments in state and local education data infrastructure are important and have shared this suggestion with partners in NCES

As this is an ongoing survey, we encourage you to look for future OMB requests for comments on this collection. Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Rachel Hansen
Statistician, Project Director, School Pulse
National Center for Education Statistics (NCES)
U.S. Department of Education

Submitter Information

Submitter's Representative: Amanda Karhuse, Director of Policy and Advocacy

Organization: National Association of Secondary School Principals (NASSP)

Comment

The National Association of Secondary School Principals (NASSP) submits the following comments in response to the Department of Education's (ED) Comment Request for Agency Collection Activities for the School Pulse Panel (pulse survey) posted on June 13, 2021. NASSP is the leading organization of and voice for middle level and high school principals and other school leaders across the United States. NASSP seeks to transform education through school leadership, recognizing that the fulfillment of each student's potential relies on great leaders in every school committed to the success of each student.

The COVID-19 pandemic was one of the most disruptive disasters for education in our country's history—one that teachers, principals, and assistant principals dealt with to the best of their abilities. Their continued dedication to serving the nation's youth is nothing short of remarkable and should be commended at all levels of government. As educators and students now look toward the 2021–22 school year, understanding how our schools are using new federal resources allotted to them will be important in understanding best practices and filling in future gaps in our education system. For these reasons, NASSP commends ED for the development of this pulse survey.

Two specific areas of data collection NASSP is pleased to see included were questions VI and VII in Supporting Statement Part A that was released alongside the call for comments. The Centers for Disease Control and Prevention reported that from April through October of last year, the proportion of children between the ages of 5 and 11 visiting an emergency department because of a mental health crisis climbed 24% compared to that same time period in 2019. Among the ages of 12–17, the number increased by 31%. Similar data can be found for educators. RAND Corporation researchers found that between May and October 2020, the proportion of K–12 educators seriously worried about burnout rose from one quarter to 57%. Collecting information on the mental health of students, educators, and other school staff will paint a clearer picture of the needs of those within our school buildings and will provide valuable insight into possible other needs that ED, state education agencies, and local education agencies can provide.

In NASSP’s ongoing conversations with principals across the nation, one of the most common concerns school leaders mention are staffing shortages. Even prior to the pandemic, schools faced shortages of teachers, principals, and other staff. The stress of dealing with the pandemic has caused so much burnout among educators that many are deciding to leave the education profession altogether. The National Education Association’s recent survey of 2,690 members found that 32% of respondents said the pandemic has led them to plan to leave the profession earlier than they anticipated. A survey by the RAND Corporation showed similar results. Nearly 1 in 4 teachers reported they may leave their job by the end of the 2020–21 school year, compared with 1 in 6 who were likely to leave prior to the pandemic. NASSP surveyed over 1,000 of its members last August and found that 45% of principals report that pandemic working conditions are accelerating their plans to leave the profession. If our students are to make up the lost instructional time and achieve at their highest levels, we will need a well-qualified education workforce that is capable of serving the needs of each student. Data collected in question VII from the pulse survey would play a pivotal role in better understanding the status of our nation’s educator workforce and provide clarity into the strength of the overall education profession.

To strengthen the pulse survey, NASSP has a recommendation under question V in Part A of the Supporting Statement. While NASSP agrees the current requests for data under question V are important, an additional question on funds used to support educator professional development should also be included. As noted in ED’s “Frequently Asked Questions: Elementary and Secondary School Emergency Relief Programs” document, one allowable use of ARP funds is “to provide professional development to educators on research-based strategies for meeting students’ academic, social, emotional, mental health, college, career, and future readiness needs, including strategies to accelerate learning without remediation or tracking.” Professional development for educators will be extremely important for them as they hone their craft and seek to make up for lost instructional time caused by the pandemic. For this reason, NASSP suggests adding the language below to question V:

iv. Professional development for teachers, principals, and other staff?

NASSP appreciates the opportunity to submit these comments and looks forward to future opportunities for collaboration to best support our nation’s students and educators. If you require any additional information or have any questions related to these comments, please contact me at karhusea@nassp.org.

Sincerely,



Amanda Karhuse
Director of Policy & Advocacy
NASSP

"Overwhelmed" and "Unsupported," 45 Percent of Principals Say Pandemic Conditions Are Accelerating Their Plans to Leave the Principalship. NASSP. (2021, June 28). <https://www.nassp.org/news/overwhelmed-and-unsupported-45-percent-of-principals-say-pandemic-conditions-are-accelerating-their-plans-to-leave-the-principalship/>.

Sparks, S. D. (2021, March 31). *Data: What We Know About Student Mental Health and the Pandemic*. Education Week. <https://www.edweek.org/leadership/data-what-we-know-about-student-mental-health-and-the-pandemic/2021/03>.

Walker, T. (2021, June 17). *Educators Ready for Fall, But a Teacher Shortage Looms*. NEA. <https://www.nea.org/advocating-for-change/new-from-nea/educators-ready-fall-teacher-shortage-looms>.

RESPONSE:

Thank you for your feedback posted on July 12, 2021 responding to a 30-day request for comments on the proposed School Pulse Panel Preliminary Activities. The National Center for Education Statistics appreciates your interest in and support of the School Pulse Panel survey. I have provided a response to your comments below.

We are pleased to hear you share our interest in how the COVID-19 pandemic has affected student mental health and staff vacancies. We also appreciate your suggestion to add a question about whether American Rescue Plan (ARP) funds have been used to fund professional development for teachers. Thank you for your suggestion to revise questions about how American Rescue Plan (ARP) funds have been used to support digital learning. We agree that a question about this topic could yield important information. However, after testing questions about funding in our survey with school-level staff we have decided to remove this line of questioning as school-level staff were not the appropriate responder to such questions. We feel that another collection would be a better venue for your suggested question: the Education Stabilization Fund-Elementary and Secondary School Emergency Relief Fund (ESSER I/ESSER II/ARP ESSER Fund) Recipient Data Collection Form (Agency/Docket number: ED-2021-SCC-0096). If you have not already done so, we encourage you to review the Federal Register notice for this collection which is inviting public comment through August 31, 2021.

We appreciate your raising the issue of educator burnout and professional development about mental health for teachers. We are considering testing questions on these topics for inclusion in future collections this winter or spring.

As this is an ongoing survey, we encourage you to look for future OMB requests for comments on this collection. Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Rachel Hansen
Statistician, Project Director, School Pulse
National Center for Education Statistics (NCES)
U.S. Department of Education

Submitter Information

Submitter's Representative: Carl Bryan, Administrative Rules Coordinator

Organization: Wisconsin Department of Public Instruction

Comment

The Wisconsin Department of Public Instruction (WDPI) appreciates the opportunity to submit comments regarding proposed information collection related to the School Pulse Panel Preliminary Activities. The WDPI supports the aims of the proposed survey and believes there may be value in the information obtained as schools reopen in the fall. However, the WDPI urges the United States Department of Education to be mindful of the increased burden the proposed collection could place on schools and to find ways to minimize this burden.

For example, the WDPI recommends that schools already participating in the current 2020-21 survey not also be asked to participate in the new survey. These schools were originally sampled to participate in the National Assessment of Educational Progress (NAEP) 2021 assessments, and then asked to complete the current monthly survey. The WDPI believes these schools should not be included in the sample frame for the new monthly survey.

Further, the WDPI would like to caution against requiring too much time of schools to complete this survey. The previous survey was estimated to take 30 minutes, but it took most schools much longer and resulted in schools dropping out of study or not completing full surveys. Time estimates for the new survey are higher. Asking more time of schools will result in lower participation rates and potentially risk recruitment efforts for NAEP participation if the survey is coordinated by NAEP State Coordinators again.

Finally, the WDPI recommends that the United States Department of Education ensures that detailed questions, such as those about attendance or mode of instruction, be asked in such a way that respondents can easily obtain the information from their Student Information Systems. This would improve the accuracy of responses and minimize the burden on schools.

Thank you for the opportunity to comment. If you have any questions, please contact Visalakshi Somasundaram, Director, Office of Educational Accountability, at visalakshi.somasundaram@dpi.wi.gov.

Sincerely,

Carl Bryan

Administrative Rules Coordinator

RESPONSE:

Thank you for your feedback posted on July 12, 2021 responding to a 30-day request for comments on the proposed School Pulse Panel Preliminary Activities. The National Center for Education Statistics appreciates your interest in and support of the School Pulse Panel survey. I have provided a response to your comments below.

We appreciate and share your concern about the time burden to complete this survey. Our sample has been drawn. While we are unable to eliminate all overlap between samples across NCES collections, this is a goal we will work towards in future collections.

We appreciate your concern about the time it takes to respond to this survey. We have had the opportunity to test items in our survey that ask for information about attendance and mode of instruction with school-level administrators from around the country and have made efforts to ensure that the survey data we collect will

be accurate and easy to complete for participants. We will continue to refine our questions for future collections with this concern in mind.

Although we expect our survey will take longer than the NAEP survey in the spring, we are offering a \$5,000 reimbursement to schools in exchange for their participation throughout the year. It is our hope that this will be able to offset some of the time burden associated with this collection. Moreover, based on feedback we've received for the NAEP survey in the spring, we believe that, while the survey may take some time to complete in initial waves, later collections will take less time as schools and respondents become more familiar with the survey.

As this is an ongoing survey, we encourage you to look for future OMB requests for comments on this collection. Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Rachel Hansen
Statistician, Project Director, School Pulse
National Center for Education Statistics (NCES)
U.S. Department of Education

Submitter Information

Submitter's Representative: Elizabeth Campbell, Senior Director

Organization: The Academy of Nutrition and Dietetics

Comment

The Academy of Nutrition and Dietetics (the "Academy") appreciates the opportunity to submit comments to the Food and Nutrition Service of the U.S. Department of Education related to its information collection activities, "The School Pulse Panel Preliminary Activities," published in the Federal Register originally on June 11, 2021. Representing more than 112,000 registered dietitian nutritionists (RDNs);¹ nutrition and dietetic technicians, registered (NDTRs); and advanced-degree nutritionists, the Academy is the largest association of food and nutrition professionals in the United States and is committed to improving the nation's health through food and nutrition.

The Academy applauds the efforts of the U.S. Department of Education to collect information on issues concerning the impact of the COVID-19 pandemic on students and staff in U.S. public primary, middle, high and combined-grade schools. Specifically, the Academy urges the collection of how school nutrition programs were frontline responders during the pandemic and establish best practices for future emergency scenarios, how the pandemic has impacted the financial security of school nutrition programs and how school nutrition programs can be elevated as key strategies to address health disparities that were highlighted by the COVID-19 healthy emergency.

Academy Position on School Meals

¹ The Academy approved the optional use of the credential "registered dietitian nutritionist (RDN)" by "registered dietitians (RDs)" to more accurately convey who they are and what they do as the nation's food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

It is the position of the Academy of Nutrition and Dietetics, School Nutrition Association, and Society for Nutrition Education and Behavior that comprehensive, integrated nutrition programs in preschool through high school are essential to improve the health, nutritional status, and academic performance of our nation's children.² The Academy urges the Department of Education to collect information that will help with the stabilization and future leveraging of the school nutrition programs to establish healthy eating habits and contribute to strategies to address Social Determinants of Health such as access to healthy food environments and educational outcomes.

A. School Nutrition Program as First Responders in COVID-19 Pandemic

As the nation grappled with the impact of COVID-19 disruptions, school nutrition professionals worked on the frontlines to combat rising levels of food insecurity in their communities. School meal programs chose to keep workers employed, deliver meals to students with no additional reimbursement and expose staff to the coronavirus with little to no funding for proper personal protective equipment. The Academy urges the Department of Education to collect best practices in emergency response in order to inform policies for response in future emergencies. During the pandemic, many school nutrition programs maintained fixed expenses such as salaries while taking on unanticipated expenses including hazard pay and transportation, all while participation rates were significantly reduced. School nutrition programs rely on reimbursement from meal service to pay for expenses. This unanticipated loss of revenue has forced programs to tap into fund balances and draw upon lines of credit to sustain their operations. Congress has provided modest emergency relief funds for these programs but Academy members have reported that these financial losses are likely to impact school nutrition programs for the next year or two. Given school meal programs' critical impact on learning and food security, it is imperative to understand what program support is needed while protecting jobs and limited education resources. The Academy urges the Department of Education to collect information to give a complete financial overview of how the pandemic has impacted school nutrition programs and what it will take to stabilize this crucial program.

B. Healthy School Meals for All

Providing healthy school meals for all school age children, regardless of their ability to pay, is a potential strategy to alleviate the disproportionate childhood food insecurity levels experienced by minority children. This disparity existed prior to the pandemic but has been exacerbated by the impact of COVID-19; in 2019, USDA reported that 23% of Black households with children and 17% of Latinx households with children were food insecure, in comparison to only 10% of white households with children.³ During the pandemic, this disparity only increased, as the Urban Institute reported that food insecurity among Black households with children increased to 40%, and among Latinx households with children up to 39%.⁴ School meals have proven crucial in alleviating childhood food insecurity amid the pandemic, in no small part because of waivers allowing schools to serve meals free of charge to all students regardless of their income level.

² Hayes D, Contento IR. Position of the Academy of Nutrition and Dietetics, Society for Nutrition Education and Behavior, and School Nutrition Association: Comprehensive Nutrition Programs and Services in Schools. *Nutr Educ Behav*. 2018 May;50(5):433-439.

³ Household Food Security in the United States in 2019. USDA Economic Research Service. September 2019. Available at: <https://www.ers.usda.gov/webdocs/publications/99282/err-275.pdf?v=4232.8>

⁴ Forty Percent of Black and Hispanic Parents of School-Age Children Are Food Insecure. Urban Institute. December 2020. Available at: <https://www.urban.org/research/publication/forty-percent-black-and-hispanic-parents-school-age-children-are-food-insecure>

In addition to being a key support in alleviating childhood food insecurity among minority students, school meals can also help reduce racial disparities in health and education. School meals reduce childhood hunger, decrease childhood overweight and obesity, improve child nutrition and wellness, enhance child development and school readiness, and support learning, attendance and behavior.⁵ Maintaining access to healthy school meals for all students will ensure that every child has access to the wide ranging educational and health benefits of school meals, regardless of their racial or ethnic background.

Because of how vital school meals have been during the pandemic in alleviating childhood food insecurity for Black students, we cannot go back to a school meal format that left out so many students through the tiered payment system, school lunch debt and stigma. Many struggling families do not qualify for free school meals under the current tiered system and school meal fees create a barrier to participation, not to mention stigma for children with lunch debt who experience lunch shaming practices. Offering free meals to all students eliminates the cost barrier for families who do not qualify, but who still struggle to make ends meet. Further, by having every student participate in school meals, it helps address the stigma some children fear of being labeled “poor” by their classmates, a phenomenon felt hardest by middle and high school students.

As we continue to work to heal our nation in the aftermath of the twin pandemics of COVID-19 and systemic racism, now is the time to maintain healthy school meals for all as a key educational support to ensure that students have access to the key nutrition they need to thrive inside and outside the classroom. **The Academy urges the Department of Education to collect information on the impact of free school meals for all has had on students during the pandemic and what resources would be needed to continue this practice beyond this health emergency.**

C. Conclusion

The Academy of Nutrition and Dietetics appreciates the opportunity to submit comments to the U.S. Department of Education in response to its request for information, “The School Pulse Panel Preliminary Activities” and we urge the department to examine how best to support access to healthy school meals as students return back to school full time. Please contact either Jeanne Blankenship at 312-899-1730 or jblankenship@eatright.org, or Liz Campbell at 202-775-8277 ext. 6021 or ecampbell@eatright.org, with any questions or requests for additional information.

Sincerely,

Jeanne Blankenship, MS, RDN
Vice President
Policy Initiatives and Advocacy
Academy of Nutrition and Dietetics

Liz Campbell, MA, RDN
Senior Director
Legislative & Government Affairs
Academy of Nutrition and Dietetics

RESPONSE:

Thank you for your feedback posted on July 12, 2021 responding to a 30-day request for comments on the proposed School Pulse Panel Preliminary Activities. The National Center for Education Statistics appreciates

⁵ FRAC reference

your interest in and support of the School Pulse Panel survey. I have provided a response to your comments below.

Thank you for providing your suggestion to collect information on the expansion of the school lunch program during the COVID-19 pandemic and the effects of that expansion on the program itself and students. We agree that this topic could provide important information about how schools have responded to the COVID-19 pandemic and how the pandemic has affected students. As with all new items or topics proposed for inclusion in a questionnaire, we will need to conduct research and then develop and test new question items for principals and teachers in K-12 schools to ensure correct comprehension and interpretation, and to ensure that our targeted respondents are able to provide relevant information on this topic before including such items in a national (full-scale) collection. At this point in the survey schedule, we are unable to accommodate additional testing for initial fall collections but will test questions and consider adding them to future collections this winter or spring.

As this is an ongoing survey, we encourage you to look for future OMB requests for comments on this collection. Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Rachel Hansen
Statistician, Project Director, School Pulse
National Center for Education Statistics (NCES)
U.S. Department of Education

Submitter Information

Submitter's Representative: Stacey Pelika, Ph.D. Director of Research

Organization: National Education Association

Comment

1. Is this collection necessary to the proper functions of the Department?

The National Education Association (NEA) strongly supports the School Pulse Panel. This monthly data collection will provide necessary data about how the nation's schools are handling the ongoing challenges presented by the Coronavirus pandemic. We are particularly pleased that ED intends to ask about access to much needed technological, mental health, and special education resources, and that the survey will track staff vacancies. The latter data on vacancies has been needed for years but is an even higher priority now that the pandemic has led many educators to question whether they will continue in their chosen professions.

2. Will this information be processed and used in a timely manner?

One reason this research is necessary is that typical ED data collection efforts take years to process, so the data are not current by the time they are available. This is sufficient for some topics but does not meet the needs of educators, school leaders, policymakers, or researchers when the nation's schools are confronted with an immediate and evolving crisis such as the pandemic. Similarly, timely and valid data about the extent of staff shortages are necessary to adequately respond to workforce dynamics in the moment.

3. Is the estimate of burden accurate?

We have no comment related to the estimated burden.

4. How might the Department enhance the quality, utility, and clarity of the information to be collected?

The NEA offers the following recommendations:

- When asking about hybrid schooling (i.e., the combination of in-person and remote learning), we recommend asking respondents to clarify what type of hybrid schedule their school is using and to what extent students have in-person interaction with teachers and fellow students. This clarification is necessary given that hybrid schedules vary greatly in terms of time spent in school building, and in some hybrid structures, students are physically present in school but are still learning through virtual platforms.
 - We recommend dividing the section on “special education and mental health services” into two separate sections. While there is some overlap, these domains are sufficiently distinct in terms of substance, approach, and audience, with mental health services offered to teachers and staff in addition to students.
 - In terms of the questions regarding the use of American Rescue Plan funds, we recommend including a specific item regarding the improvement of school ventilation and air quality systems.
 - Regarding staffing, we recommend that the current topic (“As of the start of the 2021-22 school year, do you have any administrative staff, teacher, or support staff vacancies?”) be expanded to capture the extent of shortages in each of those categories (i.e., how many vacancies exist for teaching positions, administrators, counselors, paraeducators, etc.). We also strongly recommend that this question be asked monthly or at least once per quarter as schools may experience mid-year departures or challenges filling open slots in a timely manner, with both of these dynamics becoming more common during the pandemic.
5. How might the Department minimize the burden of this collection on the respondents, including through the use of information technology?

Given that this is a panel survey, ED could consider prepopulating responses from the prior month’s survey and asking respondents which, if any, data points need to be updated. This would significantly reduce respondent burden. ED should also consider providing a printer-friendly template of the survey instrument. This template would aid a school’s lead respondent in gathering data from other colleagues.

Contact: Stacey Pelika, Ph.D.
Director of Research
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RESPONSE:

Thank you for your feedback posted on July 12, 2021 responding to a 30-day request for comments on the proposed School Pulse Panel Preliminary Activities. The National Center for Education Statistics appreciates your interest in and support of the School Pulse Panel survey. I have provided a response to your comments below.

1. Thank you for providing your suggestion to ask a follow up question about hybrid schooling within the survey. We are drafting a follow-up question to ask schools to specify whether students receiving live instruction from a teacher in-person in the same classroom, for potential inclusion in upcoming fall collections or for testing in future collections.

2. Thank you for your suggestion on formatting the survey to divide the mental health and special education questions. These topics will appear in different sections in our survey and we feel that this section is sufficiently divided per your suggestion.
3. Thank you for your suggestion to add a question about how ventilation systems have been improved using American Rescue Plan (ARP) funds. We agree that a question about this topic could yield important information. However, after testing questions about funding in our survey with school-level staff we have decided to remove this line of questioning as school-level staff were not the appropriate responder to such questions. We feel that another collection would be a better venue for your suggested question: the Education Stabilization Fund-Elementary and Secondary School Emergency Relief Fund (ESSER I/ESSER II/ARP ESSER Fund) Recipient Data Collection Form (Agency/Docket number: ED-2021-SCC-0096). If you have not already done so, we encourage you to review the Federal Register notice for this collection which is inviting public comment through August 31, 2021.
3. We feel that our current survey sufficiently captures the number and type of vacancies as it asks about vacancies for mental health professionals, and different subject area teachers. We also are pleased to inform you that we do intend to ask this question repeatedly throughout the school year. Per your helpful suggestion, we are drafting a response item to ask about vacancies in administrative positions to add for the fall collection.
4. Thank you for your suggestion to ease the time burden of this survey by pre-populating answers and providing printer-friendly layouts. We are discussing these possibilities, with our data collection partner, and – should they be feasible with our chosen survey platform – we will implement as soon as we can.

As this is an ongoing survey, we encourage you to look for future OMB requests for comments on this collection. Thank you again for your comment and please do not hesitate to contact us with questions or for help.

Sincerely,

Rachel Hansen
Statistician, Project Director, School Pulse
National Center for Education Statistics (NCES)
U.S. Department of Education
