



AMERICAN PUBLIC HEALTH ASSOCIATION
For science. For action. For health.

January 21, 2016

Ms. Deborah Spitz
United States Department of Education
400 Maryland Avenue SW
Room 3E306
Washington, DC 20202

Attention: ED-2015-OESE-0130

Subject: Request for information on implementation of the Every Student Succeeds Act

Dear Ms. Spitz:

The American Public Health Association (APHA) is a diverse community of public health professionals who champion the health of all people and communities. At APHA, the Center for School, Health and Education links the education and health communities to ensure that all students – particularly those facing social inequities – are supported to graduate. The Center promotes a number of public health strategies to reduce health-related risks to learning and educational success. We appreciate the opportunity to comment on the Department of Education’s (the Department) implementation of the Every Student Succeeds Act (ESSA). When issuing regulations on the school and community needs assessments ESSA requires,¹ we urge the Department to clarify that these needs assessments may include information about the health status of students and the social determinants of health they encounter.

Health Affects Education

Health and educational attainment are linked. The evidence suggests that health has a large effect on student educational outcomes.² Not only does health contribute to academic success, but poor health can hinder achievement in school.³ Likewise, education influences health throughout the lifespan.⁴ Consequently, on time high school graduation is a key public health priority identified by Healthy People 2020.⁵

¹ See ESSA Section 1005 State Plans, amending the Elementary and Secondary Education Act Section at 1111(d)(1)(B)(iii), page 37, <https://www.gpo.gov/fdsys/pkg/BILLS-114s1177enr/pdf/BILLS-114s1177enr.pdf>

² Basch CE. Healthier students are better learners: a missing link in school reforms to close the achievement gap. *J Sch Health*. 2011; 81: 593-598.

³ Id.

⁴ Freudenberg N, Ruglis J. Reframing school dropout as a public health issue. *Prev Chronic Dis*. 2007 4(4). Accessed January 19, 2016 from http://www.cdc.gov/pcd/issues/2007/oct/07_0063.htm

⁵ Department of Health and Human Services. Healthy People 2020: Social Determinants of Health. Accessed January 19, 2016 from <https://www.healthypeople.gov/2020/leading-health-indicators/2020-lhi-topics/Social-Determinants/data>

Student health is shaped by social determinants, like poverty, violence, and the school environment. For example, students in low-income households, who are more likely to experience health challenges from poverty and low income, are also more likely to drop out of high school than children in high-income households.⁶ Poverty also negatively affects childhood brain development, which has negative consequences throughout life.⁷ In school, children from low-income households scored lower on standardized tests, and this can partially be explained by decreased brain development.⁸ Additionally, according to the Robert Wood Johnson Foundation, young people exposed to violence, “are more likely to have poor educational outcomes and lower educational attainment.”⁹

The Value of Including Health in Needs Assessments

For many students, health needs are educational needs. Providing comprehensive assessments of student health risks and needs can be used to plan intervention and prevention strategies at both the student and school level. By including health in needs assessments, states, communities, and schools have more information to improve educational outcomes and develop strategies to respond to the influences that derail educational success.

Just as health is not determined solely in the doctor’s office, educational outcomes are not determined solely in schools. Needs assessments that consider social determinants of health present in the community can help school administrators identify issues they may not have been aware of and would enable them to determine the strategies required to reverse or reduce the trends indicated in the assessment. It would also help them to identify community resources to support their efforts. The needs assessment would also help schools determine whether to implement policies that support student health. A closer examination of how the school environment affects student health, for example, might arise from a needs assessment. Or, a decision to have a school-based health center that can offer primary care and preventive services to students in a way that does not remove them from school might be precipitated by an assessment.

Research indicates that school environment, including the rules and policies it operates under, is a social determinant of health.¹⁰ Factors like health programs and education provided, the physical surroundings of the school, school climate, school connectedness, and disciplinary

⁶ Rumberger R. Poverty and high school dropouts. American Psychological Association. May 2013. Accessed January 19, 2016 from <http://www.apa.org/pi/ses/resources/indicator/2013/05/poverty-dropouts.aspx>

⁷ Hair N, Hanson J, Wolfe B, Pollak S. Association of Child Poverty, Brain Development, and Academic Achievement. *JAMA Pediatr.* 2015; 169(9): 822-829. Accessed January 19, 2016 from <http://archpedi.jamanetwork.com/article.aspx?articleid=2381542>

⁸ Id.

⁹ Robert Wood Johnson Foundation. Violence, Social Disadvantage and Health. May 2011. Accessed January 19, 2016 from http://www.rwjf.org/content/dam/farm/reports/issue_briefs/2011/rwjf70452

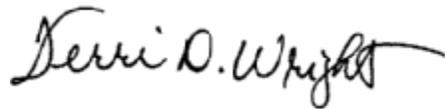
¹⁰ Department of Health and Human Services. Healthy People 2020: Social Determinants of Health. January 2016/ Accessed January 19, 2016 from <http://www.healthypeople.gov/2020/topics-objectives/topic/social-determinants-of-health>

policies all contribute to student health.¹¹ Including guidance for health needs assessments in ESSA could assist schools and districts in considering each of these from a different lens and could facilitate looking beyond their walls to form cross-sector partnerships dedicated to improving both educational outcomes and health.

There are resources available to support states, communities, and schools in including health in needs assessments. For example, APHA uses a tool designed by the University of Michigan to assess student health risks, behaviors, and the social determinants of health they face. The Department should make these resources available to states, communities, schools as they conduct their needs assessments

Thank you for the opportunity to provide comments. APHA looks forward to working with you to ensure that ESSA is implemented with the health and education of all students as a priority.

Sincerely,

A handwritten signature in black ink that reads "Terri D. Wright". The signature is written in a cursive, flowing style.

Terri D. Wright, PhD, MPH
Director, Centers for Public Health Policy & School, Health and Education

¹¹ Huang K, Cheng S, Theise R. School Contexts as Social Determinants of Child Health: Current Practices and Implications for Future Public Health Practice. *Public Health Rep.* 2013 Nov-Dec; 128 (Suppl 3): 21-28. Accessed January 19, 2016 from <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3945445/>