
About the School-Based Mental Health Services Grant (SBMH) Program

As you know, the U.S. Department of Education may invite applications for the “School-Based Mental Health Services Grant (SBMH) Program.” The Department has issued intended “priorities, requirements, and definitions” for competitions in fiscal year (FY) 2025 and later years.

The announcement indicates the intent is “to better target activities designed to increase the number of credentialed school-based mental health services providers, specifically school psychologists, in high-need local educational agencies (LEAs) available to provide mental health services to students.”

(Note that the focus is on *services*, not on developing ways to promote or prevent mental health problems.)

They have invited comments on or before August 18, 2025. <https://www.federalregister.gov/>

We have reviewed some of the early comments. Not surprisingly, the concerns raised mainly challenge the priority to increase the number of credentialed school-based mental health services providers – **“specifically school psychologists.”** For example:

- >The Kentucky Department of Education directly states that it is “concerned by the limiting nature of the new priorities, which focus on increasing the number of ‘credentialed school psychologists’.” And they emphasize that “unnecessarily limits access to school-based mental health providers.”
- >Another comment specifically asks that the priorities “be revised to include school counselors alongside school psychologists.”
- >Another states: “Any federal call for grant applications aimed at enhancing student mental health, academic achievement, or school-based services should include school counselors alongside school psychologists to ensure a holistic, coordinated, and effective approach to meeting the needs of all learners.”
- >The Small School Districts’ Association concerns include recommending the following as priorities:
 - A. Explicitly permit grantees-particularly those in rural areas-to hire and train school counselors and school social workers as allowable expenditures under the grant.
 - B. Provide additional resources or incentives for developing innovative approaches to training and retaining school psychologists in rural areas, such as distance learning programs, stipends for internships, or state-specific credentialing pathways that recognize prior experience.
 - C. Recognize that workforce realities vary greatly by region and that a one-size-fits-all requirement could inadvertently disadvantage the very students most in need.

From our Center’s perspective, the way the feds are approaching this highlights the continuing marginalization of efforts to help schools address students well-being and school success. And as the comments indicate, it exacerbates the counterproductive competition among those who are tasked with providing student supports.

Whatever happens with all this, let’s not forget:

- >schools have an increasing number of students who are seen as having mental health problems and a few more service providers will not address the need
- >students with mental health problems almost always have behavior and learning problems, and students with learning and behavior problems almost always have related emotional problems
- >the need is to provide more than just a few more services and add a few more student support staff.

The need is for a more unified, comprehensive, and equitable *system* that addresses the emotional, behavior, and learning problems in ways that enable teachers to teach and students to learn.

What leadership must do is fundamentally expand the framework for school improvement policy and practice to end the marginalization of and begin the transformation of student/learning supports.

This said: folks certainly will go after these grants and any others that are offered.

But the well-being of students and schools calls for doing much more than can be accomplished by a few extra resources, especially when the focus is just on providing and integrating a few more *services*.

Those concerned with student well-being need to offer a broad approach that details a feasible role schools can play in conjunction with their community in addressing barriers to learning and teaching and reengaging disconnected students and families. Such an approach needs to transform existing student and learning supports and develop them into a unified, comprehensive, and equitable system designed for all students in a school. (Transformation means shifting thinking beyond services and special initiatives.)

The focus on MTSS is a start; but only a start. While adopting a continuum of interventions (such as called for by MTSS) is a necessary step, it is not enough. A truly effective system must also define and integrate the domains of support within that continuum. See:

>Building on MTSS to Enhance How Schools Address Barriers to Learning

<https://smhp.psych.ucla.edu/pdfdocs/BuildMTSS.pdf>

We stress that it is feasible to start the transformation with whatever resources are currently available. The core and heart of available resources are those student and learning support staff at district and school levels that are still on the staff. See:

>Student/Learning Supports: A Brief Guide for Moving in New Directions

<https://smhp.psych.ucla.edu/pdfdocs/briefguide.pdf>

It is time to revise the roles and functions of such personnel so that they can pursue the steps highlighted in the above guide. (For a perspective on how job descriptions might be reworked to support transforming student/learning supports, see

>Part III of *New Roles and Functions for Student/Learning Support Staff* –

<https://smhp.psych.ucla.edu/pdfdocs/report/framingnewdir.pdf>

Let us know your views. Send to Ltaylor@ucla.edu .

Best wishes and be well,

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