October 15, 2019

U.S. Department of Education
Office of Communications and Outreach
Washington, DC 20202

RE: Comments on criteria for RISE Award and RISE Submission Form
Docket ID number ED-2019-ICCD-0097

Dear Office of Communications and Outreach:

The National Education Association, founded in 1857, represents more than 3 million members, including approximately 500,000 education support professionals (ESPs), referred to in the RISE Award program as classified employees. The ESP members of NEA work in public preK-12 schools and on public college campuses in nine career groups: paraeducators; clerical services; custodial and maintenance services; food services; transportation services; technical services; skilled trades services; security services; and health and student services.

ESPs strive to provide all students with the support, encouragement, and services that lead to success. NEA devoted several years to advocating for a national award for ESPs to highlight their significant contributions to the overall educational experience, and we are grateful to Congress for voting overwhelmingly to create the RISE Award and its enactment. We appreciate this opportunity to comment on the proposed information collection request related to the award.

Our comments focus on question number 4 in the “Supplementary Information” portion of the Department of Education’s request for comments.

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

- We suggest that the nomination form make clear, perhaps in the “Purpose” section, that both full-time and part-time employees are eligible for the RISE Award. We also suggest an allowance be made to include employees of Department of Defense Education Activity schools.

- The legislation only includes pre-K-12 ESPs, but it is our hope that that the RISE Award will be expanded to one day include the hard-working and dedicated ESPs who work in higher education.

- While we acknowledge that the legislation creating the RISE Award includes private schools, our preference would have been that the legislation focus only on the many dedicated ESPs who work in public schools, which enroll most of America’s students.

Selection Criteria
We suggest adding an additional criterion: “(F) Attention to professional excellence such as may be demonstrated through participation in a professional growth continuum.” With that addition, we suggest adding the following footnote: “A professional growth continuum is a system for professional growth that includes standards, learning opportunities, and levels of practice.”

This language will ensure that a nominee considers her/his position a career, worthy of reflection on and improvement in. Furthermore, our research tells us that ESPs are very interested in opportunities to learn and grow in their careers; this is indicative of their devotion to students and to their chosen professions. An award that recognizes their contributions should acknowledge that professional growth is an important indicator of excellence and commitment to the field.

Technical Assistance

For the purpose of providing input and advice in the selection process, we recommend forming an advisory panel that would include two representatives from the National Education Association, among organizations that represent classified employees. This will ensure that the voices of classified employees, through their own organizations, are part of the award program.

Submission Form

Contact Information

A line for the nominee’s home address line should be added. Some classified school employees have limited or no internet access and the U.S. Postal Service may be the sole means of contacting them with information about the award.

The form does not make allowances for employees who work for more than one school. For example, school bus drivers serve district-wide.

A line for the state in which the classified school employee resides should be added.

Institutional Information

Add to the “Institutional Information” heading, in parentheses: Check all that apply

The “School type” information makes no allowance for employees who work district-wide instead of for a single school. An option should be added for “multiple schools” or “District-wide”

Similarly, the “School Demographics” section should be edited to accommodate employees who work in multiple locations or district-wide.

Documentation

In the first line after 250, add “maximum.”

Add an item “(F) Attention to professional excellence as may be demonstrated through participation in a professional growth continuum.” (For the reason stated above, under Selection Criteria)

Add a footnote related to the new item (F): “A professional growth continuum is a system for professional growth that includes standards, learning opportunities, and levels of practice.”
Certifications

- The first line addressing signatures should recognize that a principal may not be the appropriate signatory for some employees, i.e., a school bus driver or food service worker, and “(or equivalents)” may not be clear enough to account for this. We suggest language such as “…school principal or appropriate supervisor…”
- We suggest inserting after the word “knowledge”: “Additionally, in schools where the classified school employees are represented by a professional association or labor organization for the purpose of either collective bargaining or meet and confer, the president of that association or union will sign.”
- In the line for the principal’s signature, the words “or supervisor” should be added to reflect that some classified school employees do not work for a principal.
- A line should be added for the Local Association or Union President to sign (pursuant to the earlier suggestion) in situations where the classified employees are represented for purposes of collective bargaining or meet and confer.

Thank you again for this opportunity to offer comments on the proposed information collection request related to the RISE Award. We look forward to working with you to ensure that the award spotlights the valuable work of education support professionals.

Sincerely,

Marc Egan
Director of Government Relations
National Education Association