



November 13, 2017

Jennifer Bell-Ellwanger
Director of the Policy and Program Studies Service
U.S. Department of Education
400 Maryland Avenue SW
LBJ, Room 6W231
Washington, DC 20202-4537

RE: Docket ID ED-2017-OS-0078

Dear Ms. Bell-Ellwanger:

On behalf of Child Trends and the 14 undersigned organizations, we write to respond to the notice published in the Federal Register on October 12, 2017 concerning the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs. Our organizations represent a diverse community of researchers, practitioners, national associations, and parental advocacy groups committed to helping educators create healthier and more successful school environments for all students through better policy, stronger programming, and continuous stakeholder input.

It is through this lens that we are excited to see the Secretary continue the tradition of setting program priorities for the Department of Education, particularly priorities designed to create safer, more respectful school climates. We are also encouraged to see the Secretary's stated commitment to help our education systems "...utilize and build evidence of what works" while supporting efforts to develop innovative solutions to present education challenges. It is with this commitment in mind that we offer the following recommendations.

1) Encourage the use or development of evidence-based approaches, including approaches to improve student health, in projects intended to improve school safety, reduce classroom disruption, or reduce chronic absenteeism.

We agree with the Secretary that schools must be provided the support to create healthier learning environments for all students, and we applaud the inclusion of Priorities 10(a) and 10(b) in the Supplemental Priorities. As written, however, it is unclear whether the strategies supported by these priorities will be required to meet the standards of evidence as defined by the *Every Student Achieves Act* reauthorization of the *Elementary and Secondary Education Act*. Ensuring that proposed strategies include at least "promising evidence" is critical to ensuring

positive outcomes for youth and ensuring that limited federal funds for such activities are not spent on ineffective or potentially harmful activities.¹

Further, the Priority 10(b), as written, fails to acknowledge the role of student health—particularly student mental health and exposure to trauma—in student behavior. For example, it is well-established that children exposed to violence are more likely to exhibit threatening behaviors than their peers.² Youth who are hungry or who have not had opportunity for physical activity are also more likely to misbehave.³ For this reason, we also recommend revisions to Priority 10(b) to encourage projects that either promote student health or promote strong relationships as a means to reduce bullying, violence, disruptive actions and disciplinary removals.

Acknowledging that the evidence base is still growing around strategies to improve the learning environment,⁴ we also recommend adding a fourth priority, Priority 10(d), focused on evaluating innovative efforts.

Suggested revision to promote evidence-based approaches:

- Original Priority 10(a): Creating positive and safe learning environments, including by providing school personnel with effective strategies.
- Revised Priority 10(a): Creating positive and safe learning environments by providing school personnel with evidence-based interventions (as defined in the *Every Student Succeeds Act*)

Suggested revision to account for student health in efforts to promote safe, positive environments:

- Original Priority 10(b): Developing positive learning environments that promote strong relationships among students, faculty, and staff to help enhance the learning environment and prevent bullying, violence, and disruptive actions that can diminish the opportunity to receive a high-quality education.
- Revised Priority 10(b): Expanding the use of evidence-based interventions (as defined in the *Every Student Succeeds Act*) that promote strong relationships among students, faculty, and staff, or promote student health, to enhance the learning environment and prevent bullying, violence, disruptive actions, and disciplinary school removals that can diminish the opportunity to receive a high-quality education.

¹ Flay, B. R., Biglan, A., Boruch, R. F., Castro, F. G., Gottfredson, D., Kellam, S., ... & Ji, P. (2005). Standards of evidence: Criteria for efficacy, effectiveness and dissemination. *Prevention Science*, 6(3), 151–175.

² Moore, K., Sacks, V., Bandy, T., & Murphy, D. (2014). Adverse childhood experiences and the well-being of adolescents [Fact Sheet]. *Child Trends Publication 2014-32*. Retrieved from https://childtrends-ciw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2014/07/Fact-sheet-adverse-childhood-experiences_FINAL.pdf.

³ Putnam, S. C., Tette, J., & Wendt, M. (2004). Exercise: A prescription for at-risk students. *Journal of Physical Education, Recreation & Dance*, 75(9), 25–28. doi: 10.1080/07303084.2004.10607296.

⁴ National Academies of Sciences, Engineering, and Medicine. (2016). *Preventing bullying through science, policy, and practice*. National Academies Press.

Suggested new priority to further innovation:

- New Priority 10(d): Evaluating new or existing strategies to create a positive learning environment with the goal of expanding the evidence base.

2) Encourage educators to acknowledge and address the bi-directional relationship between bullying and free expression.

While we acknowledge that a school climate rife with bullying and harassing behaviors may inhibit the free exchange of ideas and viewpoints, as described in the introductory section of Priority 10, Priority 10(c) does not acknowledge that bullying and harassing behaviors often include disrespectful, threatening, or demeaning communication and language. Schools must strike a balance between protecting free speech and preventing hostile learning environments. After all, schools are legally obligated to address speech that creates a hostile learning environment based on race, color, national origin, sex, and disability under federal civil rights law; and for many other groups under state and local law.⁵ For this reason, we recommend that Priority 10(c) be amended to clarify that efforts to protect free speech must include a focus on respectful interaction between the members of the school community, and that protection of free speech does not allow for speech that creates a hostile learning environment for any student.

Suggested revision to both protect free expression and advance efforts to address bullying behaviors:

- Original Priority 10(c): Protecting free speech in order to allow for the discussion of diverse ideas or viewpoints.
- Revised Priority 10(c): Establishing initiatives to protect free speech to promote the respectful exchange of diverse ideas or viewpoints and encourage student, family, and staff engagement, while maintaining a respectful and positive school climate for all students.

We are grateful for this opportunity to provide comments and suggestions on the Secretary's Proposed Supplemental Priorities. For any questions regarding this letter, please contact Deborah Temkin, director of education research at Child Trends (dtemkin@childtrends.org; 240-223-9265).

Sincerely,

Child Trends, Inc.
Alliance for a Healthier Generation
America's Promise Alliance
Collaborative for Academic, Social, and Emotional Learning (CASEL)
Center for Health and Health Care in Schools at The George Washington University
ChangeLab Solutions
EMT Associates, Inc.

⁵ Ali, R. (2010). Dear Colleague Letter: Harassment and Bullying. US Department of Education. Retrieved from: <https://www2.ed.gov/about/offices/list/ocr/letters/colleague-201010.pdf>.

Gwinnett SToPP
Healthy Schools Campaign
The National Association of State Boards of Education
National Association of School Psychologists
National School Climate Center
School-Based Health Alliance
STOMP Out Bullying