July 23, 2019

The Honorable Ron Johnson
Chairman
Committee on Homeland Security &
Government Affairs
U.S. Senate
328 Hart Senate Office Building
Washington, D.C. 20515

The Honorable Gary Peters
Ranking Member
Committee on Homeland Security &
Government Affairs
U.S. Senate
724 Hart Senate Office Building
Washington, D.C. 20515

Dear Chairman Johnson, Ranking Member Peters and Members of the Committee on Homeland Security & Government Affairs:

On behalf of National PTA and our 3.5 million PTA members, we appreciate the opportunity to submit this letter in advance of the Committee’s hearing on “Examining State and Federal Recommendations for Enhancing School Safety Against Targeted Violence,” scheduled for July 25, 2019. National PTA is the oldest and largest volunteer child advocacy association in the United States, with congresses in all 50 states, DC, Virgin Islands, Puerto Rico and Europe. For over 120 years, National PTA has been a strong advocate for family engagement and ensuring every child can attend school in a healthy and safe environment.

We are concerned that this hearing will focus solely on the hardening of schools and increased surveillance of students which could undermine student safety and civil rights, thereby threatening students’ ability to learn and prosper within their schools. Many of these initiatives are reactionary rather than carefully considered evidence-based policies and practices which National PTA endorses in A Framework for Safe and Successful Schools.

A founding principle of National PTA’s mission is to promote the safety and well-being of all children and youth, so we share the concerns of students, parents, educators and lawmakers who work to fulfill the right of students and educators to attend schools that are safe and conducive to learning and achievement. National PTA recognizes that school safety is a multi-faceted issue with no one clear solution for each community. All efforts to address school safety must involve all stakeholders, especially students, parents, and families and take into account a variety of factors including the physical and psychological safety of students.

First and foremost, schools must protect students and educators from the inside out by promoting a positive school climate that encourages nurturing relationships, and mutual trust and respect among students, staff and families. Our association believes that any federal school safety initiatives must:
• Involve students, parents and families in the development, implementation and evaluation of all school safety plans, including emergency preparedness, crisis response, and threat assessment protocols, school discipline policies and procedures, and student health and wellness support services
• Provide and connect students with necessary behavioral and mental health resources at school and in their community
• Improve access to and funding for qualified school-based health and wellness practitioners, such as school counselors, school nurses, school psychologists and school social workers
• Refrain from arming educators and other school personnel
• Encourage schools to use positive school discipline policies and behavioral interventions and supports that are effective, fair and consistently implemented
• Require all decisions related to physical security measures—including the use of a School Resource Officer (SRO) —to be locally determined, collaborative and incorporate input from students, parents, families, educators, school leaders and the community

Our association is also concerned about the impact of consistent budget shortfalls faced by many schools to implement evidence-based school safety policies and practices. Schools have been forced to rely on local law enforcement in their attempts to establish safe learning environments, and this been to the detriment of school mental health services. In March 2019, Education Week reported that 1.7 million students attend schools with police officers but no counselors, 3 million students attend schools with police officers but no school nurses, 6 million are in schools with police officers but no school psychologists and 10 million are in schools with police officers but no social workers.

National PTA believes that any effort to offer students the healthiest and safest learning environments possible must improve staffing ratios of school counselors, school psychologists, school social workers and school nurses to provide school-based behavior, health and mental health services. Specifically, we urge Congress to fully fund Title IV-A, the Student Support and Academic Enrichment Grant program under the Every Student Succeeds Act (ESSA) at its authorized level to support safe and healthy students through comprehensive school mental health programs, drug and violence prevention programs, training on trauma-informed practices and other health and physical education programs.

Furthermore, any efforts to keep schools safe must also focus on protecting students’ privacy, dignity, and right to a high-quality education. It is important that this hearing closely examine the privacy and equity implications of recent state school safety proposals and laws calling for increased surveillance or data sharing in an attempt to reduce school violence. In particular,
we are concerned that some of these proposals may discriminate against or target students based on their disability or perceived differences. Our association has endorsed the Ten Principles for School Safety which provides a guide to policymakers and education stakeholders on the role and importance of privacy and equity in safety plans. National PTA is deeply committed to the promotion of privacy and security policies that maintain the confidentiality of sensitive data that students and families provide to educational institutions, as well as the data collected at school and through the use of online products and services.

If school safety measures include physical or digital monitoring, it must be developed transparently, in consultation with experts, students, families, educators and community stakeholders, and must focus on real threats of harm. Students and parents deserve to attend schools where decisions about threats are made by those who are most affected and have deep knowledge of the strengths and vulnerabilities of their campus. School administrators, counselors, and educators—human beings who can account for students’ particular needs—are in the best position to make these decisions rather than a broad based algorithm. It is also imperative that if students are identified as a threat, they and their families are party to the information used to make that decision and must have an opportunity to correct or amend erroneous information and have access to support services to address the perceived threat.

Many organizations have noted that surveillance technologies like social media monitoring and facial recognition can harm students by stifling their creativity, individual growth, and speech, as well as contribute to the school-to-prison pipeline. Studies show that school surveillance can disproportionately target students with disabilities and students of color. If schools use surveillance tools in classrooms and hallways, students and their families deserve clear policies on which data is collected, who has access to it, how it will be used, and when it will be destroyed. Students and parents deserve assurance that the data will not be misused and that data collection and storage will comply with relevant privacy laws. Students and families expect that schools be held accountable, with clear consequences for those who put student privacy at risk by violating data-sharing protocols.

Any efforts to ensure the safety of students and educators within schools must be evidence-based and carefully balance students’ privacy and their physical and psychological safety, while also engaging all stakeholders. National PTA promotes the establishment of and support for school safety policies and procedures that emphasize family engagement, adequate funding for student supports and services, and conditions that create and foster positive and welcoming school environments.
We appreciate the opportunity to share our views on school safety. If you would like additional information regarding National PTA’s positions on these issues, please contact Jacki Ball, Director of Government Affairs at (703) 518-1243 or jball@pta.org.

Sincerely,

Leslie Carrell Boggs
President
National PTA

Nathan R. Monell, CAE
Executive Director
National PTA