

February 28, 2022

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U.S. Department of Education
400 Maryland Avenue SW, Room 3E326
Washington, DC 20202

Re: Docket ID number ED-2021-OESE-0122, Proposed Priorities, Requirements, and Definition-Project Prevent Grant Program

As the oldest and largest child advocacy association in America, National PTA thanks the Department deeply for the commitment in addressing the alarming spike in community violence and the cycle of community violence, particularly being experienced and witnessed by our nation's youth and school communities at-large. The trauma, disruption, stress, and isolation caused by the COVID-19 pandemic have acutely impacted the mental well-being of our nation's youth and the longstanding mental health and well-being challenges facing our whole communities. We believe we are now bearing witness as a nation how the compounding effects of several simultaneous crises is manifesting itself into the resulting surges in community violence and we must bring each crisis individually and collectively to an end so that all of our nation's students may succeed and reach their full potential.

Introduction

An estimated 46 million American children will be affected by violence, crime, abuse or psychological trauma in a given year—referred to as adverse childhood experiences (ACEs).¹ A child's exposure to ACEs and the resulting trauma significantly impacts their mental and physical health through adulthood. In fact, a groundbreaking Center of Disease and Prevention Centers and Kaiser Permanente study in 1997 found that ACEs significantly harm a child's brain development, and that they are the root cause of most chronic and mental illnesses and future violence in their adult years.² Research also shows that mindful and healthy practices provide greater resiliency and improved outcomes for children, and evidence-based systemic prevention and intervention programs enhance youth development, growth and safety.

What is needed most is a comprehensive approach to addressing the needs of children exposed to violence and trauma, mitigating the negative impacts through increased access to health-related care, supporting school and community-based resources and intervention, and making improvements to the juvenile justice system. With the support of the Department, states and

¹ See Listenbee, R. et al., "Report of the Attorney General's National Task Force on Children Exposed to Violence." U.S. Department of Justice. 2012. <https://www.justice.gov/defendingchildhood/cev-rpt-full.pdf>.

² See Felitti, Vincent J. et. al., Relationship of Childhood Abuse and Household Dysfunction to Many of the Leading Causes of Death in Adults. American Journal of Preventive Medicine. 1998. [www.ajpmonline.org/article/S0749-3797\(98\)00017-8/fulltext](http://www.ajpmonline.org/article/S0749-3797(98)00017-8/fulltext).

local jurisdictions can create connected communities, positive school climates and trauma-informed schools that keep students healthy and in school.

Proposed Definition

The Department proposes to define “community violence” as “firearm injuries, assaults, homicides, and other acts of interpersonal violence committed outside the context of a familial or romantic relationship.”

National PTA supports this definition and believes that any effort to improve the safety of our nation's youth and communities must be comprehensive and include gun violence-prevention measures and gun safety. We must continue to address the social, economic and behavioral causes that lead to the multi-faceted problem of violence, especially in incidents that involve firearms. Gun violence can and will decrease through measures that include the appropriate evaluations, wrap-around services, and robust education programs to teach students, parents, and community members about gun safety and violence prevention. National PTA stands committed to eliminating the negative impacts of community violence to ensure every child has the opportunity to reach their fullest potential.

Proposed Priority 1—Addressing the Impacts of Community Violence

The Department proposes to prioritize projects that collaborate with local community-based organizations and engage families and the broader community in the implementation of community- and school-based strategies to help prevent community violence and mitigate the impacts of children and youth's exposure to community violence.

National PTA strongly supports this priority. We know that families are the essential ingredient to ensure a high-quality education for every student, and that family engagement is vital for the positive emotional and social development, cultural growth, and academic achievement of every child. Decades of research show that students whose families are engaged are more likely to attend school, avoid discipline problems, achieve at higher levels and graduate.³ Meaningfully engaging families is therefore critical to student well-being and success, including in the development and implementation of school policies, positive school climate, family-focused interventions for youth involved in the juvenile justice system and mental health services and delivery. Moreover, early research highlights the promise for family and

³ See Henderson, A.T. & Mapp, K.L. A new wave of evidence: The impact of school, family and community connections on student achievement. Austin: SEDL. 2002. See also Hill, N. & Tyson, D. Parental involvement in middle school: A meta-analytic assessment of the strategies that promote achievement. *Developmental Psychology*, 45(3): pgs. 730-763. 2009. See also Fan, X. & Chen, M. Parental involvement and students' academic achievement. *Educational Psychology Review*, 13: 1: pgs. 1-22. 2001. See also Jeynes, W. A meta-analysis of the efficacy of different types of parental involvement programs for urban students. *Urban Education*, 47, 706-742. 2012.

community-based interventions to specifically reverse the negative impact of ACEs.⁴ A coordinated effort between communities and schools to lessen the short- and long-term effects of community violence on children will prove more effective and meaningful in maintaining a safe and healthy environment for all students.

We encourage the Department to prioritize projects that meaningfully engage families and engage them in a way that is accessible and inclusive. Local, council, regional and state PTAs are a phenomenal resource and connection to a network of families within a community.

National PTA, with our Center for Family Engagement, are leading efforts in transformative family engagement. [Transformative family engagement](#) is a shared effort of families, schools, and community leaders to advance programs, practices, and policies that empower every parent to make their child's potential a reality. All family engagement should transform the lives of every child in America. In this work using research findings and best practices for family-school partnerships, we use the guiding principles of the 4 I's of transformative family engagement—Inclusive, Individualized, Integrated, Impactful—with strategies parents and caregivers can use as a model to implement these principles in their school community. There are PTAs across the country with successful examples of transformative family engagement from PTAs across the country, particularly those who have participated in National PTA's [Schools of Excellence program](#).

Proposed Priority 2—Established Partnership with a Local Community-Based Organization

The Department proposes to prioritize projects that include at least one memorandum of agreement (MOA) or memorandum of understanding (MOU) signed by the authorized representative of a local community-based organization that agrees to partner with the applicant on the proposed project and provide resources or administer services that are likely to substantially contribute to positive outcomes for the proposed project.

National PTA agrees that structured partnerships clearly defining the roles, responsibilities, and resources are critical to efficiently and effectively implement community- and school-based intervention strategies to help prevent community violence and mitigate the impacts of exposures to community violence. We encourage the Department to also ensure that these partnerships are transparent and that their accompanying MOAs/MOUs are made available and accessible to the public, including parents and guardians in the community. A successful strategy for preventing and mitigating community violence and other childhood ACEs must, by necessity, involve parents, guardians, and other caregivers in the community.

⁴ See Hall, Judy et. al., Reducing Adverse Childhood Experiences (ACE) by Building Community Capacity: A Summary of Washington Family Policy Council Research Findings. Journal of Prevention & Intervention in the Community. 2012. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3483862/>.

Proposed Priority 3—Supporting Children and Youth from Low-Income Backgrounds

The Department proposes to prioritize projects that serve local educational agencies where a significant proportion of students enrolled are from families with an income below the poverty line.

National PTA strongly supports this priority. PTA’s mission is to make *every* child’s potential a reality by engaging and empowering families and communities to advocate for *all* children. Equity is embedded in our mission and in everything that we do. Across the country, students, families and educators experience vastly different education systems that either support— or hinder—the ability for all children to reach their full potential. These differences are often due to disparities in opportunities, access and financial resources—and whether or not parents are respected as equal partners in their child's education. Childhood ACEs and community violence disproportionately impact children of color and children from low-income families, and we are committed to providing our communities with resources to strengthen advocacy at the local level to address all issues of equity and disparate outcomes.

We encourage the Department of Education to prioritize and advocate for innovative, sustainable solutions that work for a diverse range of children and families, especially those underrepresented and/or marginalized in our communities.

Proposed Application Requirements

The Department proposes several program and application requirements for this program related to strengthening the capacity of schools and communities to prevent and mitigate the impacts of community violence.

Timeline: We appreciate the requirement that applicants include a timeline of activities, especially a timeline around engaging community and school partners, families, and other stakeholders. We encourage this engagement to be meaningful, accessible, and continuous as families will be key partners in addressing and preventing ACEs and community violence.

National PTA also recommends allowing time for critical conversations and authentic approaches at the local community level. Recommended by the Office of Juvenile Justice & Delinquency Prevention (OJJDP) in its [Shared Framework for Reducing Youth Violence and Promoting Well Being](#), this work must “consider the differential impact on populations and how they should be factored into strategy development. The complex and interwoven nature of race, class, immigration status, disability, gender, gender identity, and sexual orientation is evidenced through discrimination, disparities, social isolation, de facto housing segregation, and the unequal allocation of resources within communities. This requires comprehensive and candid examination of the historical, cultural, and socio-economic landscape; outreach and implementation of interventions that are culturally informed and relevant to the populations of

interest; and community- and societal-level strategies to achieve the wellbeing and violence reduction strategies sought. Primary considerations include rates of violence and differential population impacts, historical trauma, disparities, including racial, ethnic, disability, and gender-based disparities, and cultural context, and distribution of resources.” However our local PTAs might engage and support the work to bring all families together on this, please let us know.

School-Based Mental Health Services: Our association supports providing school-based professionals—teachers, principals, counselors, nurses, psychologists, social workers and paraprofessionals—with professional development on positive behavioral interventions, restorative justice, and trauma-informed care, including on the topic of resiliency in trauma-exposed children, thereby creating an education and support system that is trauma-informed at all levels. Enhancing linkages between LEA mental health services and community mental health systems is also essential to help ensure affected students receive referrals to treatment as appropriate. We also support the Department’s efforts to improve staffing ratios of school counselors, school psychologists, school social workers, and school nurses to provide school-based behavior, health and mental health services.

Staff & Community Education & Training: Increased access to violence prevention and mental health intervention and prevention programs for youth and their families affected by ACEs is critical. We applaud implementation that includes training on and execution of evidence-based, culturally competent, and developmentally appropriate programs; continuing engagement with stakeholders; communicating and collaborating strategically with community partners; and evaluating program implementation. Specifically, we recommend States and local agencies make education and training programs available to families and caregivers about the warning signs that may mean a child needs further evaluation and/or intervention.

National PTA believes that culturally and linguistically responsive teaching and learning are imperative in building socially competent and aware children and youth, enhancing their intellectual capability and psychosocial well-being. It has been shown to yield positive educational results, including: achievement of higher test scores, decreased truancy rates, exhibited higher self-esteem, and increased graduation rates, creating greater post-secondary opportunities for all students. National PTA supports and advocates for inclusive K-12 curricula and multicultural resources and materials to empower students and families of all backgrounds to understand themselves more effectively in relation to others. Classrooms that celebrate diverse histories and cultures break down existing barriers and create supportive and inclusive schools that encourage students to grow and learn in the safest and most empowering spaces possible.

Safe, Supportive, and Inclusive Schools: PTA firmly believes that all students—including students from historically marginalized populations—have the right to a quality, equitable education in a safe, supportive and inclusive school. We advocate for policies that support every student’s mental health and provide and connect students with necessary behavioral and

mental health resources at school and in their community, encourage schools to use positive behavioral interventions and supports that are effective, fair and consistently implemented, and promote social emotional learning, including resources for families to support this critical practice at home.

We applaud interventions and activities related to positive coping techniques, anger management, conflict management, de-escalation, and mediation, promotion of positive behavior, and development of protective factors. We support approaches that are comprehensive and examine areas for improvement, both within the school and the community, related to learning conditions that create a safe and healthy environment for students. Finally, we support interventions and services, such as mentorship programming, that target individual students who are at a higher risk for committing or being a victim of violence.

In doing this work, we would encourage the Department to prioritize projects that focus on positive behavioral interventions and seek collaboration with community-based organizations, mental health professionals, and families, over those that rely heavily on partnerships between local educational agencies and law enforcement. While law enforcement officers must be invested in addressing community violence, we would caution against any approach that takes an overly punitive approach with our children and in our nation's schools. We know that overly punitive discipline policies—including zero tolerance policies and automatic suspension and/or expulsion—are not effective in addressing or improving student behavior. Rather, recent research has revealed that such policies contribute to a host of negative consequences including an increase in problem behavior and engagement in risky and dangerous behavior, a less positive school climate, decreased academic achievement, increased risk of dropout and involvement in the juvenile justice system.⁵ Moreover, such practices are often applied discriminatorily, including referrals to law enforcement, contributing to the criminalization of children of color. Schools must remain a safe place for all students.

Should an LEA partner with law enforcement, we recommend training for law enforcement officers, juvenile and family court judges and youth judicial officers in de-escalation techniques and positive interventions, as well as training to recognize signs and symptoms of violence and the role that trauma plays in delinquency and the rehabilitation of youth. Any law enforcement officer interacting with students should receive specialized training on students with special needs, adolescent development, de-escalation techniques and conflict resolution.

⁵ See Are Zero Tolerance Policies Effective in the Schools? An Evidentiary Review and Recommendations. American Psychological Association Zero Tolerance Task Force. 2008. <https://www.apa.org/pubs/reports/zero-tolerance.pdf>. See also Dear Colleague Letter on the Nondiscriminatory Administration of School Discipline. U.S. Department of Education and U.S. Department of Justice. 2014.

Conclusion

We appreciate the opportunity to provide comments on the “Proposed Priorities, Requirements, and Definition-Project Prevent Grant Program.” A founding principle of National PTA’s mission is to promote the safety and well-being of all children and youth. This must start by preventing the occurrence of ACEs and traumatic events in childhood, for all our nation’s children. We must all come together to prevent youth and community violence before it begins and protect our children from engaging in violence. We must better understand the factors that protect youth from engaging in violence and we must support and lift up the voices of children and communities already impacted by violence, doing whatever we can to ensure each individual child knows there is a pathway to healing.

Sincerely,



Anna King
President
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