



May 12, 2016

John B. King, Jr.
Secretary
United States Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Dear Secretary King:

We are pleased to provide this letter in response to the Department's (ED) request for comments on areas in which ED can provide non-regulatory guidance to assist state and local education agencies (SEAs and LEAs), and other grantees in understanding and implementing the Every Student Succeeds Act (ESSA). The passage of ESSA presents the ED with a tremendous opportunity to provide guidance that will improve educational outcomes for tens of millions of students. This guidance should include information for SEAs and LEAs on how they can use ESSA to support positive school climates and respond to the needs of children suffering from exposure to violence and the effects of trauma.

There is now clear scientific research supporting what educators have known all along - the environment surrounding where children live and the experiences they bring with them into the classroom greatly affect their learning once they enter the schoolhouse doors. What has not been known until recently is the direct impact these "Adverse Childhood Experiences" (ACES)¹ have on students' behavior and academic achievement. The statistics are staggering. **Forty-six million children in the United States are exposed to violence, crime, abuse, or psychological trauma in a given year²—nearly two out of every three children in this country.** There is a direct correlation between these ACES and students' educational and health outcomes:

¹ While there have been numerous versions of the ACES study done, the original study focused on these categories of adverse childhood experiences: psychological, physical, or sexual abuse; violence against the mother; or living with household members who were substance abusers, mentally ill or suicidal, or ever imprisoned.

² Listenbee, R., et al., "Report of the Attorney General's National Task Force on Children Exposed to Violence." U.S. Department of Justice. 2012. pp. 3. Web.
<<http://www.justice.gov/defendingchildhood/cev-rpt-full.pdf>>.

- Students traumatized by exposure to violence have been shown to have lower grade-point averages, more negative remarks in their cumulative records, and more reported absences from school than other students.³
- Children with two or more ACEs were more than 2.67 times more likely to repeat a grade, even when adjusting for demographic characteristics and health factors.⁴
- Trauma can affect sustained and focused attention, making it difficult for a student to remain engaged in school.⁵
- Chronic stress can have a permanent negative effect on the chemical and physical structures of a child’s brain, causing trouble with concentration, memory, and creativity.⁶

Perhaps most concerning, individuals who have experienced six or more ACEs die 20 years earlier on average than those who have experienced none.⁷ The harms from childhood exposure to violence and the effects of trauma are further detailed in a 2015 report, “Safe, Healthy, and Ready to Learn: Policy Recommendations to Ensure Children Thrive in Supportive Communities Free From Trauma and Violence.”

The undersigned organizations represent a diverse spectrum of national, state, and local groups that work in areas including education, health, juvenile justice, and child development. Collectively, we represent millions of parents, children, health care professionals, community-based advocates, and educators. Although our vocations are different, our goal is the same—to provide students with the supports they need to succeed in school and in life.

³ "The Effects of Trauma on Schools and Learning." The National Child Traumatic Stress Network. Web. <<http://www.nctsn.org/resources/audiences/school-personnel/effects-of-trauma-q7>>.

⁴ Bethell, C., et al., “Adverse Childhood Experiences: Assessing the Impact on Health and School Engagement and the Mitigating Role of Resilience.” *Health Affairs*, Vol. 33, No. 12. Dec. 2014 pp. 2111.

⁵ "Effects of Emotional Trauma on the Brain and Learning." Bright Hub Education. Web. <<http://www.nctsn.org/trauma-types/complex-trauma/effects-of-complex-trauma>>.

⁶ "Teaching Through Trauma: How Poverty Affects Kids' Brains." Southern California Public Radio. 2 June 2014. Web. <<http://www.scpr.org/blogs/education/2014/06/02/16743/poverty-has-been-found-to-affect-kids-brains-can-o/>>.

⁷ Ohio Association of County Behavioral Health Authorities, “Behavioral Health: Developing a Better Understanding,” (citing Department of Health and Human Services Letter to State Directors). Oct. 2013. pp. 1. Web. <http://www.oacbha.org/docs/TIC_October_2013.pdf>.

To that end, we recommend ED provide guidance, technical assistance, and examples of best practices for SEAs and LEAs on how they can use the various provisions in ESSA to support teachers, principals, and other school leaders, in partnership with other organizations and entities, to combat youth exposure to violence and trauma, improve school climate, and expand mental health services. As detailed below, there is a great deal of information ED can provide to SEAs, LEAs, and other stakeholders on how they can address these issues in school accountability and improvement efforts, professional development opportunities, state, district, and school reporting, and programmatic activities, both in and out of school.

Title I

State and LEA Plans

Under ESSA, each state plan must, among other things, describe how the SEA will support LEAs receiving Title I funds to improve conditions for student learning. LEA plans must also describe how they will improve these conditions. **In order to assist SEAs and LEAs with this effort, we suggest ED compile a database of evidence-based programs and promising practices that address each of the areas described in the statute under this provision, including:**

- incidences of bullying and harassment;
- overuse of discipline practices that remove students from the classroom and those that have a disparate impact on subgroups of students;
- how to effectively coordinate with other state and local government entities to ensure students receive needed services and supports;
- how to effectively engage parents and families in promoting a positive school climate; and,
- how to minimize the use of aversive behavioral interventions that compromise student health and safety. One of the most aversive behavioral interventions is corporal punishment, which in itself is a form of violence. We urge you to include data about the harms caused by corporal punishment in any guidance put out by ED.⁸

We urge you to utilize an intersectional approach in identifying evidence-based programs and promising practices, and to highlight the importance of intersectional analysis of data by SEAs and LEAs. There are, for example, gendered consequences of disciplinary policies for girls of color, who are frequently overlooked in data collection and programmatic responses to discipline disparities.⁹ Utilizing an intersectional analysis that takes into account, for example, both gender

⁸ See Gershoff, E., “Spanking and Child Development: We Know Enough Now To Stop Hitting Our Children.” National Institutes of Health. Sept. 2013. Web.

<<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3768154/pdf/nihms-488975.pdf>>.

⁹ See Crenshaw, K., “Black Girls Matter: Pushed Out, Overpoliced and Underprotected.” African American Policy Forum. 2015. Web.

and race/ethnicity, would enable researchers and policymakers to develop more targeted approaches to address the distinct needs of specific subgroups of students.

Accountability

Each state plan must also contain at least one indicator of school quality or student success, such as a measure of school climate and safety. Given that this is a new area of accountability, **ED should provide SEAs with information about the promising practices of other states and districts that have already begun incorporating these measures.** For instance, the CORE districts in California have already done extensive work in this area and could be a model for other jurisdictions.

ED can assist LEAs with the required needs assessment by providing examples of how other LEAs have successfully accomplished this task in a way that considers the need of the whole child. In addition, ED can provide guidance on how LEAs can integrate diverse community-based stakeholders (e.g., community mental health providers or youth serving organizations) into the needs assessment process.

School Improvement

Under ESSA, LEAs must identify resource inequities as part of their support and improvement plans. **ED should provide SEAs and LEAs with examples of these resource inequities,** including examination of the number and qualifications of specialized instructional support personnel in the LEA, the number and percentage of teachers who have been trained in trauma-informed-care, and how those personnel are deployed across the district.

ED should also provide guidance on school improvement strategies for LEAs to consider.

This guidance should include how LEAs can use Title I funds to support programs and activities related to youth violence and trauma, mental health supports, and related activities and supports, such as creating trauma-sensitive schools, and/or full-service community schools. In addition, ED's guidance should explain how LEAs could use various federal, state, and local funding streams and programs to complement and support each other.

Title II

Under Title II, Part A, LEAs can use professional development funds for, among other things:

- the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness; the use of referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community, where appropriate;

<http://static1.squarespace.com/static/53f20d90e4b0b80451158d8c/t/54d2d22ae4b00c506cffe978/1423102506084/BlackGirlsMatter_Report.pdf>.

- forming partnerships between school-based mental health programs and public or private mental health organizations; and,
- addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.

It is critical that teachers, principals, and other school leaders receive quality professional development on how to engage with students who have been exposed to violence and are affected by trauma because the success of policy solutions that address these issues depends on the ability of those on the ground to deliver effectively needed services. For example, “acting out” behaviors like aggressiveness, disrespect, and truancy are often punished rather than being recognized as behavioral responses to particular types of trauma and violence.¹⁰ **ED should develop and support partnerships with and between teachers’ unions, organizations and universities that train specialized instructional support personnel, and schools of education to provide guidance to SEAs on ways in which LEAs can incorporate this type of training into their ongoing professional development activities.**

Title IV

Title IV provides an important opportunity to provide significant support to SEAs and LEAs in their efforts to reduce youth exposure to violence and the effects of trauma. Part A of this Title, the Student Support and Academic Enrichment Grant program (SSAEG), seeks to improve the capacity of SEAs and LEAs to (1) provide students with access to a well-rounded education; (2) improve school conditions for student learning; and, (3) improve the use of technology. A critical component of these efforts is inclusion of programming that supports safe and healthy students, as detailed in Section 4108 of ESSA. When providing SEAs and LEAs with guidance under this program, it is important for ED to take a holistic view on how to address the problems of youth exposure to violence and trauma. **We suggest that ED do the following:**

- Provide technical assistance, including a best practices guide, to LEAs on the intersections among childhood trauma, race/gender equity, social and emotional learning, and excessive school discipline, as well as evidence-based solutions and promising practices;
- Use a portion of its technical assistance and capacity building reservation of funds to fund a technical assistance center dedicated to assisting SEAs and LEAs in creating and supporting trauma sensitive schools, as well as to highlight promising practices. The center should design a blueprint that can guide training, infrastructure needs, and policies needed to create a universal and whole school approach to supporting students. The guide should discuss how various federal laws can support particular populations that may be more likely to experience trauma, such as homeless students or students in foster care.

¹⁰ Saar, M.S., et al., “The Sexual Abuse to Prison Pipeline: The Girls’ Story.” Human Rights Project for Girls. 2015. Web. <http://rights4girls.org/wp-content/uploads/r4g/2015/02/2015_COP_sexual-abuse_layout_web-1.pdf>.

ED already funds a National Center on Safe and Supportive Learning Environments, which may be an appropriate place to include this work.

- As we suggested with the Title I needs assessment, ED can assist LEAs with their required Title IV needs assessment (for those school districts receiving over \$30,000) by providing examples of how other LEAs have successfully accomplished this task in a way that considers the needs of the whole child. In addition, ED can provide guidance on how LEAs can integrate diverse community-based stakeholders (e.g., community mental health providers and youth serving organizations) into the needs assessment process; and, convene a conference with SEAs, LEAs, key stakeholders, and policy experts to share information on best practices and how effectively to utilize funds under the SSAEG program.

We would like to meet with your staff to discuss these recommendations in more detail. We will follow-up to schedule a time. If any questions arise in the meantime, please contact Kiersten Stewart at Futures Without Violence. She can be reached at (202) 595-7383 or kstewart@futureswithoutviolence.org. We appreciate your consideration.

Sincerely,

Alliance for Excellent Education
American Association of University Women
American Dance Therapy Association
American Music Therapy Association
American Occupational Therapy Association
American Psychological Association
American School Counselor Association
Cooperative Metropolitan Ministries
Council for Exceptional Children
FORGE, Inc.
Futures Without Violence
Learning Disabilities Association of America
National Association of Elementary School Principals
National Association of Secondary School Principals
National Association of State Directors of Special Education
National PTA
National Superintendents Roundtable
School Social Work Association of America
US Alliance to End the Hitting of Children
YMCA of the USA
YWCA USA