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NSBA Comments on Department of Education Request for Information

Via Online Submission July 23, 2021:

www.regulations.gov

Re: Request for Information Regarding the Nondiscriminatory Administration of School Discipline, Docket ID: ED-2021-OCR-0068

The National School Boards Association (NSBA) represents through our state association



The leading advocate for public education

NSBA encourages school districts to explore the use of support and intervention approaches such as PBIS and encourages districts to move away from traditional disciplinary practices such as

administrators, teachers, and other staff. Anyone working in an educational community has the potential to impact the students they serve and has responsibility in contributing to a safe climate and culture. Trainings should focus on these big picture themes, allowing for the importance of community input, values, and decision-making, so that schools have the tools to address concerns in their specific communities. NSBA urges the Department to refrain from one-size-fits-all approaches, opting instead for sharing tools and practices that local communities and schools can utilize to develop and implement policies and procedures that work best for their students.

6. Promising practices that have reduced discipline or disparities between different groups of students.

NSBA urges the Department

8. Whether and how hiring and professional development practices can be designed and aligned to ensure staff are adequately prepared to manage classrooms and work with students in a fair and equitable manner.

A significant body of research has demonstrated the positive correlation between a diverse teaching force and improvements in student achievement, especially for students of color. Teachers of color tend to have higher expectations for students of color, which can impact student

collection to the next, increased burdens for schools who must dedicate staff time to respond to questions, and technical assistance for school staff completing the collection.

Although NSBA appreciates the time savings that may result by the Department's decision to drop certain elements from the CRDC, NSBA cautions that adding and subtracting elements from collection to collection inherently creates inconsistency and inefficiencies. At the same time the Department dropped elements including financial data and number of documented incidents involving firearms or explosives, it added elements (optional in this collection, but likely mandatory in the next) involving allegations of sexual offenses by staff and bullying of students based on religion. Changes like these often create time-consuming challenges for non-legal school officials as they struggle to understand and respond to the shifts.

Conclusion

NSBA appreciates the opportunity to provide insight on the Request for Information Regarding the Nondiscriminatory Administration of School Discipline. Upon the Department's (b) (5) (C) and (b) (5) (D) request, NSBA has provided the following information: