



April 12, 2018

The Honorable Betsy DeVos
Secretary of Education
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Dear Secretary DeVos:

On behalf of the National Center for Learning Disabilities (NCLD), which represents the 1 in 5 students with learning and attention issues in our nation's public schools, I write to express our concern regarding the Federal Commission on School Safety's lack of transparency and inclusion of diverse voices.

NCLD is encouraged by the creation of the Commission and understands its initial focus on the parents who are living through the wake of our nation's numerous school tragedies. While we agree the first step is to engage those immediately impacted by violent crimes, diverse voices must be included as the Commission develops its recommendations. Our strength as a nation comes from our ability to work collaboratively, not in silos.

NCLD has a significant interest in the Commission's work because these issues disproportionately impact students with disabilities, particularly those who are African American. According to United States Department of Education (USED) data, students with disabilities are more than twice as likely to be suspended as students without disabilities.¹ Furthermore, "25 percent of African-American boys with disabilities served by IDEA received one or more out-of-school suspensions, compared to one out of ten white boys with disabilities."² As more conversations take place surrounding safety, mental health, and discipline, students with disabilities must be appropriately included.

Therefore, we request a meeting with you and the Commission to discuss the development of any proposals. NCLD worked in concert with our advisors, researchers, and practitioners from across the country to develop evidence-based proposals which bolster school safety. As we describe in the attached Issue Brief, NCLD recommends schools invest in proactive services that allow us to identify, counsel, and support students. There is little research connecting hardening measures to improved student or school outcomes. Instead, implementing the following strategies is more effective to ensure students can learn in a safe environment:

- Use of a multi-tier system of support (MTSS), with the integration of positive behavior interventions and supports (PBIS) and evidence-based social and emotional interventions
- Provision of comprehensive mental health and counseling services for students

¹ Sources: U.S. Department of Education, Office for Civil Rights, [2013-2014 Civil Rights Data Collection: A First Look](#) (2016) and [Civil Rights Data](#)

² Sources: U.S. Department of Education, Office for Civil Rights, [2013-2014 Civil Rights Data Collection: A First Look](#) (2016) and [Civil Rights Data](#)

Conversations about school safety and student support should not take place in a vacuum. These discussions need to include the voices of many stakeholders in school safety issues, and that includes voices that adequately represent the 1 in 5. NCLD stands ready to work with the Commission to develop policies that keep all children and schools safe. Please feel free to contact NCLD's Vice President and Chief Policy & Advocacy Officer Lindsay Jones (202-628-2662 or Ljones@nclld.org) with any questions or concerns.

Sincerely,



Mimi Corcoran
President & CEO
National Center for Learning Disabilities

CC: Johnny Collett, Assistant Secretary of Office of Special Education and Rehabilitation Services
Jason Botel, Principal Deputy Assistant Secretary
Candace Jackson, Acting Assistant Secretary for Civil Rights