NASP Expresses Concern Regarding Federal School Safety Report

Bethesda, MD—The National Association of School Psychologists (NASP) believes that the United States has no greater responsibility than safeguarding the well-being of our children and youth. Ensuring safe schools and communities is paramount to this responsibility. Critical to this effort is Federal leadership—defined by specific guidance and critical resources—to help states and districts ensure that every child attends a safe and supportive school. Unfortunately, the Federal Commission on School Safety report released today misses a vital opportunity to help the nation significantly advance this work. The report largely reiterates already well-known and evidence-based efforts to improve school safety, many of which are articulated in the Framework for Safe and Successful Schools released by NASP and other leading education organizations in 2013.

Importance of School Mental Health Services

Certainly, NASP is pleased that the Commission’s report acknowledges some of the recommendations for improving school safety that were shared in writing and at the Commission hearings and all four public listening sessions. These include the importance of:

• providing comprehensive school mental health services and increasing access to school-employed mental health professionals,
• creating a positive school climate and fostering trusting relationships among students and staff, and
• using multidisciplinary teams (and the important role of the school psychologist) to: develop systems that promote-trauma informed practices and positive school climates; help identify and intervene with students who need support; engage in appropriate threat assessment and management protocols; and help schools recover and respond to school crises.

Concerns About Lack of Specific Directives and Resources

However, the Commission has largely ignored equally important and almost universal recommendations related to helping schools meet current challenges associated with improving school safety and the clear request for additional policies and resources. The Commission heard from numerous stakeholders about the lack of resources currently available to schools, including a significant shortage of school-employed mental health professionals. Schools and districts, who already struggle with how to meet competing priorities with limited resources, will be hard pressed
to make any significant improvement without additional supports. Yet the Commission did not call for any increased Federal resources or offer specific directives necessary to help states, districts, and schools expand their efforts. And while the Commission explicitly calls out various existing Federal programs that can help schools and districts improve school safety, it does not direct Congress to maintain, or better yet increase, funding for the initiatives the Commission believes to be effective.

Potentially Harmful Recommendations

We also are deeply concerned that some key report recommendations are contradictory and even potentially harmful. Most concerning are the calls to harden schools and arm school staff and the recommendation to rescind Obama era discipline guidance, which directs schools to address racial disparities in discipline and promotes alternatives to suspension and expulsion. Specifically:

1. **Arming teachers and other specialized personnel will not make schools safer.** In fact, doing so places an unrealistic, unreasonable burden on America’s educators, has the potential to cause more harm from unintentional or inaccurate discharge of firearms, and can undermine the sense of safe, supportive learning environments. Equally important, the time and costs associated with training and arming school staff diverts critical human and financial resources away from strategies known to help decrease violent behaviors, such as those also called for in the Commission report: improved access to mental health services, effective threat assessment practices, properly trained school crisis response teams, and creating welcoming, inclusive school communities for all students.

   NASP also strongly believes that possession of a firearm should be limited only to commissioned, trained school resource officers. The hazards associated with individuals possessing firearms who lack extensive law enforcement training and the sworn authority to enforce public safety include that an individual with a gun but not in uniform could be mistaken for the shooter, firearm skills degrade quickly and require constant practice under high stress conditions, being able to shoot a gun does not mean an individual is psychologically equipped to shoot another person, and discharging a firearm in a crowded school setting is extremely risky.

2. **Rescinding Obama era school discipline policies will unnecessarily harm already vulnerable student populations, help feed the school-to-prison pipeline, and undermine school climate, while not improving safety.** Assertions that the Obama administration’s school discipline guidance has decreased safety in schools are not grounded in research or reality. Black and low-income students receive longer suspensions than their peers for the same or lesser infractions, and students with disabilities receive out-of-school suspension at significantly higher rates than students without a disability. Out-of-school suspensions and expulsions do not improve student behavior, school safety, or educational outcomes. In fact, in many cases, they do the opposite. Numerous studies have shown that students who were disciplined through out-of-school suspension have a higher likelihood of grade retention, lower graduation rates, school dropout, and poorer life outcomes.

   Schools that have implemented interventions as a result of the guidance—such as providing more mental health supports, implementing restorative practices and teaching students social and emotional skills—have reported improved student behavior and safer schools. NASP believes in positive discipline policies that are consistent and fair and include multitiered supports, rather than overly harsh and punitive approaches such as “zero tolerance” policies.
Rolling back civil rights protections that are grounded in solid academic research will exacerbate the inequities in school discipline practices and reverse the progress that has been made on school safety. This guidance is vital to deter systemic disparities, implicit biases, and discipline policies with minor and subjectively defined offenses (such as insubordination).

**Framework for Safe and Successful Schools**

Endorsed by over 100 organizations and school safety experts, the Framework for Safe and Successful Schools provides a common set of recommendations for policies and practices that create and sustain safe, supportive learning environments and reinforce the interdisciplinary, collaborative, and cohesive approach required to do this work. Adequate Federal guidance, as well as investments at the local, state, and federal levels, is critical to this effort.

Examples of specific policies that NASP recommends include the following:

- Increase investments at the local, state, and federal levels for comprehensive school safety efforts.
- Allow for blended, flexible use of funding streams.
- Support implementation of multitiered systems of support.
- Increase access to comprehensive school mental and behavioral health services and school employed mental health professionals (e.g., school psychologists, counselors, and social workers).
- Examine existing ratios of school psychologists, school social workers, and school counselors, and work with district and state leaders to develop a long-term plan to achieve recommended ratios of each profession.
- Promote the use of positive and effective discipline strategies and prohibit the use of zero tolerance policies.
- Ensure that efforts include strategies to reduce disproportionality.
- Ensure that district and school building teams have representation of diverse stakeholders, including principals, teachers (general and special education), parents, school security professionals and school resource officers (SROs), school-employed mental health professionals (e.g., school psychologists), and other specialized instructional support personnel.
- Establish a process for universal screening for academic, behavioral, and emotional barriers to learning.
- Require establishment of a dedicated safety/crisis response team that includes, at a minimum, school principals/administrators, school-employed mental health professionals, school security professional/SROs, community stakeholders, parents, and other school staff as appropriate. Convene this team on a regular basis.
- Examine existing ratios of school psychologists, school social workers, and school counselors, and work with district and state leaders to develop a long-term plan to achieve recommended ratios of each profession.
- Promote the use of positive and effective discipline strategies and prohibit the use of zero tolerance policies.
- Ensure that efforts include strategies to reduce disproportionality.
- Ensure that district and school building teams have representation of diverse stakeholders, including principals, teachers (general and special education), parents, school security professionals and school resource officers (SROs), school-employed mental health professionals (e.g., school psychologists), and other specialized instructional support personnel.
- Establish a process for universal screening for academic, behavioral, and emotional barriers to learning.
- Provide annual (or biannual) professional development to all school staff in mental health first-aid, the appropriate referral process, suicide prevention, and other relevant mental and behavioral health topics.
- Develop policies and procedures for conducting suicide risk and threat assessments.
- Require establishment of a dedicated safety/crisis response team that includes, at a minimum, school principals/administrators, school-employed mental health professionals, school security professional/SROs, community stakeholders, parents, and other school staff as appropriate. Convene this team on a regular basis.
- Ensure that school security efforts are evidence-based are balanced with psychological safety.
- Remember that the use of armed security should be a local school building decision and limited only to commissioned SROs or other highly trained law enforcement officials.
For more comprehensive practice and policy recommendations to support implementation of the Framework for Safe and Successful Schools, we direct you to Policy Recommendations for Implementing the Framework and Considerations and Action Steps. NASP also has an updated summary of research on school discipline. We remain committed to advancing evidence-based efforts to improve school safety as articulated in the Framework. We look forward to working with federal, state, and local policy makers to achieve this goal.

For additional information, visit www.nasponline.org or contact NASP Director of Communications, Kathy Cowan at kcowan@naspweb.org or NASP Director of Policy and Advocacy, Kelly Vaillancourt Strobach at kvaillancourt@naspweb.org.

###