



ASSOCIATION OF  
SCHOOL BUSINESS OFFICIALS  
INTERNATIONAL



TO: Federal School Safety Commission  
FROM: AASA, AESA, ASBO, ALAS, NREA and NREAC  
DATE: June 6, 2018  
RE: Public Listening Session (morning block)

---

*I am here today on behalf of, and submit the following statement from, the following executive directors of national education organizations representing school system leaders and administrators committed to ensuring that all students are safe and secure in their learning environment:*

- Daniel A. Domenech, AASA, The School Superintendents Association
- Joan Wade, Association of Educational Service Agencies
- John Musso, Association of School Business Officials, International (ASBO)
- Nancy Lewin, Association of Latino Administrators and Superintendents
- Allen Pratt, National Rural Education Association
- Ray Patrick, National Rural Education Advocacy Consortium

As the Federal School Safety Commission moves forward in its work to achieve its stated goal of “quickly providing meaningful and actionable recommendations and best practices to keep students safe at school”, it is absolutely critical that the commission ensures both the process and outcome are very meaningful to all Americans, particularly school system leaders charged with ensuring students feel safe and supported, and that school buildings are the safest place for children to be.

This week, we shared the list of the Commission’s potential areas of study and recommendations with school leaders across the country and asked them to rank the items on the list in terms of what would be most relevant to their shared goal of keeping students safe at school. The top three areas that superintendents want the Commission to address are:

- Opportunities to improve access to mental health treatment, including efforts that raise awareness about mental illness and the effectiveness of treatment, reduce barriers to the recruitment of mental health professionals, and provide training related to violence prevention;
- Best practices for school-based threat assessment and violence prevention strategies; and
- Best practices for school buildings and campus security from federal government components, including the U.S. Department of State’s Bureau of Diplomatic Security, and also from other state, local, and private sector sources.

Of note as to how you prioritize your work, and in light of recent conversations and media coverage, the item school leaders are the least interested in having the Commission address is the repeal of the Obama Administration’s “Rethink School Discipline” policies.

In terms of improving access to mental health we recommend the following, some of which is drawn from *The Futures Without Violence Safe, Healthy, and Ready to Learn Report* issued in May 2015:

- The U.S. Depts. of Health and Human Services and Education should provide detailed guidance on how community-based mental health providers and other social service providers can receive information from schools and vice-versa about students’ physical and mental health needs while remaining in compliance with federal privacy laws.
- Flexibility should expand in all reimbursement mechanisms for behavioral and mental health that recognize the principle of “the right treatment for the right person at the right time.” In particular, incentives that enable

school districts to bill for Medicaid and use the funding to meet mental health needs for children should be greatly encouraged and incentivized.

- CMS should use innovation funding to encourage states to implement best practices and reimbursement strategies to support the mental health needs of children. The funding should also be used to cover new school positions for nurses, counselors, social workers, child and adolescent psychiatrists, and psychologists. Furthermore, the funds should help provide training opportunities for school personnel related to trauma and violence, and to respond to the needs of children and families.
- The Commission should support programs that address shortages of trained and licensed providers who can best meet the mental health needs of children, including child and adolescent psychologists, psychiatrists, and developmental and behavioral pediatric specialists. The Pediatric Subspecialty and Loan Repayment Program is one example.
- The Department should issue grants to states to help develop programs to educate teachers, school personnel, and specialized instructional support personnel on mental health conditions in children.

In terms of developing and sharing practices for school-based threat assessment and violence prevention strategies, we recommend:

- The Commission should create specific school violence-prevention goals and develop metrics for meeting those goals; prepare proposals for legislation to improve the coordination and effectiveness of these programs; identify funding gaps; direct federal agency resources toward those goals in a coordinated fashion; and, provide guidance to state and local partners, including guidance on resources and opportunities to leverage and coordinate those resources.
- The Administration should create two distinct websites that serve as a portal for states and local school districts. The first should focus on learning about and applying for grants focused on school safety. The second should focus on best practices for school-based threat assessment and violence prevention strategies as well as best practices for school buildings and campus security.
- The Administration should have a technical assistance center dedicated on a first-come, first-served basis to review a district's
  - School-based threat assessments systems
  - The development and operation of anonymous reporting systems for threats of school violence
  - Placement and use of metal detectors, locks, lighting, and other deterrent measures
  - Security training of personnel and students.

A comprehensive approach is necessary to prevent future school violence. Schools remain the safest place for children, and today's schools are considerably safer than they were 20 years ago. Over the last decade, the number of schools reporting an incident of violent crime fell by more than 20 percent. Despite successful efforts by school districts to reduce gun violence, 3,000 children and teens are killed by guns and 15,000 are injured outside of schools each year, which is far more than children in any other major industrialized country. Thus, a solution to prevent the killing of innocent youth cannot be the sole responsibility of the school community.

We want to reiterate our belief that we cannot make our schools armed fortresses. We oppose efforts to bring more guns into our schools by arming teachers and administrators. Until we eliminate the easy access to weapons and address the limited access to mental health care, the conditions that allow the continued horrific murder of educators and children in schools will happen again and again.

If we hope to prevent future tragedies at schools, we must comprehensively address school safety, gun safety and mental health. We must be willing to spend the time and resources necessary to make sustainable changes. The time to address school safety is now. Our nation's students—our nation's future—are depending on it.

*Direct any questions to Noelle Ellerson Ng ([nellerson@aasa.org](mailto:nellerson@aasa.org)) or Sasha Pudelski ([spudelski@aasa.org](mailto:spudelski@aasa.org)).*