



9/18/18

Secretary Betsy DeVos
U.S. Department of Education
Chair, Federal Commission on School Safety
safety@ed.gov

Re: The Role of Charter School Authorizers in School Safety and Discipline

Dear Secretary DeVos,

I am writing on behalf of the National Association of Charter School Authorizers (NACSA), responding to the Federal Commission on School Safety's request for stakeholder information that may inform its recommendations.

NACSA is honored to have a long history of productive partnerships with the US Department of Education. Through a combination of research and dissemination initiatives, together we have fostered innovation and spread best practices for the charter sector across the country. We are pleased to be given the opportunity to share our ideas and input as the Department considers the best ways to keep students safe at school.

Background: An Authorizer's Role in School Safety

Charter school authorizers have a responsibility to ensure the charter schools in their portfolio maintain safe learning environments for all students and school personnel. NACSA believes a safe learning environment is one that demonstrates a physical environment that keeps students and teachers safe, a discipline climate that treats students fairly, and a school culture where all students can learn.

A quality authorizer engages in meaningful oversight to verify that each charter school is achieving these outcomes and fostering a safe learning environment. This commonly includes ensuring safety compliance of the school building—by conducting site visits of facilities and reviewing emergency plans—and monitoring school data and discipline policies that are designed to keep students safe.

In pursuing these activities, quality authorizers uphold the foundational charter principles of autonomy and accountability by protecting school-level autonomy over school operations while setting meaningful expectations that protect every student's right to a safe learning environment.

NACSA's Recommendations: Filling an Authorizer's Toolbox

Authorizers depend on a myriad of tools to do this work well. We believe the best way the Commission can support authorizers is by pursuing activities that give authorizers better tools to effectively set and enforce expectations for a safe learning environment.

Preserve and Promote Policies that Focus on Outcomes

In 2014, ED and DOJ issued guidance to assist states, districts, and schools to develop practices and strategies to enhance school climate, develop discipline policies that keep students in the classroom, and ensure policies and practices comply with existing federal civil rights law. Research shows that school discipline policies can have disparate impacts on students along racial or gender lines. The ED/DOJ guidance encouraged schools and authorizers to monitor and evaluate these disparities and act where appropriate.

NACSA believes this guidance is an important resource for education stakeholders and that it should remain in place. Many authorizers have found an outcome-based approach to school discipline helpful to assessing a school's learning environment. The data serves as an important indicator for an authorizer to decide when, or if, to investigate and determine if accountability actions are warranted.

Encourage Communities to Leverage Resources to Make All Schools Safe

Charter schools and authorizers are part of the fabric of the communities they serve. Unfortunately, the very autonomy that helps charter schools achieve results can also isolate them from community-based initiatives designed to make schools safe. For example, a city police department and traditional school district may work together to create an emergency response plan for city schools, but the police department may not think to include area charter schools in the project.

Charter school students should benefit from community resources and public agencies, so local governments should include charter schools in their public safety outreach and initiatives. Specifically, it is important that federal agencies administering school safety grant funds, including the Departments of Justice and Education, incentivize communities to include all public schools in their planned grant activities. Some new federal school safety grants (including the BJA STOP School Violence Prevention and Mental Health Training Grant and the COPS Office School Violence Prevention Program), are restricted to local units of governments, such as cities or counties. These local governments have a responsibility for all students in their area, including charter school students, and assessments of their proposals should consider if they are indeed planning to provide a benefit to all schools.

Champion Best Practices for Every Stakeholder

Authorizers are hungry for information, research, and examples they can engage with in developing their practices related to school safety. At present, most resources on school safety are geared towards stakeholders that directly operate schools—school leaders, teachers, local school districts, etc. While this audience is paramount, authorizers play meaningful roles in ensuring schools are safe. However, currently there are few resources of this nature for authorizers. NACSA would be happy to work with ED to create and



disseminate such resources, and we are currently planning a session at our upcoming Leadership Conference on this topic.

The authorizing community is committed to addressing issues of school safety and student discipline in a way that reflects our core commitment to make the well-being and interests of students the fundamental value informing all our actions and decisions. We thank you for the opportunity to submit this information for the Commission to consider.

Sincerely,

A handwritten signature in black ink that reads "Greg Richmond". The signature is written in a cursive, flowing style.

Greg Richmond
President and CEO
National Association of Charter School Authorizers