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

Dear Secretary DeVos:

The Learning Disabilities Association of America (LDA) appreciates the opportunity to offer recommendations on school safety. We hope the following comments will assist in your efforts to ensure our schools are places where all children can enjoy access to a high-quality education in a safe and supportive environment.

LDA believes safe schools can only be achieved by addressing the school climate and enacting policies and procedures where each day every child in the school is acknowledged by name and made to feel an important part of the school community. LDA – a national volunteer organization representing children, youth, and adults with learning disabilities, their families, and the professionals who serve them – has been working for over 50 years to ensure children with specific learning disabilities are properly identified and receive appropriate services to enable them to fully benefit from these educational opportunities, graduate from high school, and meet their postsecondary goals. This can only happen if students feel secure in school and well-trained staff using appropriate evidence-based interventions are present.

Every school must be an emotionally and physically safe environment for learning for all students, including students with learning disabilities. To create this environment, schools must promote respect and tolerance among all students and adults, recognize and applaud successes large and small for every student, and identify as early as possible those students who need extra social, emotional, and academic supports.

Often students with learning disabilities function below grade level, especially when they reach middle and high school. This puts these students at higher risk of low self-esteem and feelings of frustration and isolation, being bullied or bullying others, or acting out in other ways. Sometimes these students are labeled as unmotivated, lazy, or unteachable, which can make them even more vulnerable. These situations can be mitigated if school staff are appropriately trained to identify students and intervene early and effectively.

In fact, all staff should be trained to identify signs of social and emotional stress and difficulties, with specific training in working with students with various disabilities, using trauma-informed practices, diffusing potentially violent situations, and identifying students in crisis. Teaching tolerance and implementing restorative practices pertaining to discipline also are critical to achieving a safe school environment. In addition, students should be taught to identify signs of stress among their peers and feel comfortable in sharing that information with adults in the building. Students should also be instructed in conflict resolution and coping skills beginning in pre-K and continuing through high school.

Schools must have available a continuum of resources that includes school-employed and community-based mental health providers, and a clear system must be in place for staff to refer students for these services. Teams of school psychologists, school social workers, and school counselors must be present in every school building in sufficient numbers to develop

positive relationships with every student. School mental health providers, as part of a strong multi-disciplinary team, can identify and serve individuals and groups of students and consult with teachers and administrators and other specialized instructional support personnel. However, in many school districts the numbers of these professionals are wholly inadequate and, in fact, have declined as school budgets have tightened.

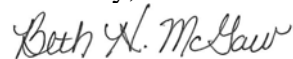
The education community should also consider how families are supported. The Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act require family involvement in developing educational programs and also to determine what specialized instructional support services, such as counseling or other social and emotional supports, a child may need to be progress in school. Families may find themselves in stressful situations, and school staff should be prepared to connect these families with community services. When family stressors are reduced, children have a better chance of participating positively and having better outcomes in school.

While LDA does not support arming teachers or other school staff or "hardening" schools, we do recognize schools need to take steps to secure their buildings. To that end, we support having school resource officers (SRO) who are trained to understand students with mental health or other behavioral challenges and to appropriately manage and interact with students. SROs should be considered a part of the school staff and assist in mentoring or other positive activities with students. In addition, all school safety plans must include specific information – and staff must be trained – on ensuring the safety of students with learning and other disabilities, should a situation arise.

Finally, an overarching concern for all school districts is the continuing inadequate federal investment in education generally. Now schools are expected to stretch their already tight federal funds to make schools safer. Congress must provide a dedicated funding stream to all schools for this purpose, rather than expect districts to use education funds appropriated for academic, social and emotional learning to retrofit buildings and campuses.

LDA appreciates the opportunity to offer these comments and suggestions. If you have questions or would like to discuss these comments further, please feel free to contact LDA Policy Director Myrna Mandlawitz, mrmassociates@verizon.net, 202-686-1637.

Sincerely,



Beth H. McGaw
President