



August 7, 2018

Ms. Betsy DeVos, Secretary
Federal Commission on School Safety
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Comments on the New York State School Boards Association to the Federal Commission on School Safety

Dear Secretary DeVos:

On behalf of the New York State School Boards Association (NYSSBA), I am writing at this time to provide the Federal Commission on School Safety with input on the various needs and concerns of New York's public schools.

Providing students with a safe and secure learning environment is one of the most important responsibilities of a school district. Now more than ever, school boards and other district leaders are evaluating their current resources and plans to determine if there are additional or different programs, policies or resources needed to keep our students and staff safe. President Trump charged the Commission with recommending policy and funding proposals to prevent school violence with a focus on issues ranging from age restrictions for purchasing certain firearms to improving students' access to mental health providers.

Our communities, including school districts, parents, law enforcement, students and other stakeholders all have ideas about the best way to ensure that our school buildings are safe places for our students and staff. Consensus in one community may be different from consensus among stakeholders in a neighboring community.

NYSSBA's members do not believe there is a single right answer to address these important issues. One size or style does not fit all. Some communities may determine that the best solution is to have a school resource officer employed by a law enforcement agency assigned to one or more of their school buildings. Another district may feel they can be better served by a security officer or team that is not affiliated with law enforcement, but rather selected and hired by the district. Others may determine their greatest need is to provide mental health services, while yet another may want to focus on the hardening of entrances or other security systems.

This is not an exhaustive list. However, these and other options have one thing in common; each will best serve students if they are adopted with local stakeholder input and support. The same could be said for the work of the Commission. The recommendations you make will be best served if they are carefully balanced and all stakeholders are included.

Part of what is needed to improve school safety is resources. The omnibus spending package that was signed into law in March included \$1.1 billion for the Student Support and Academic Enrichment (SSAE) block grant (also known as Title IV-A). Under the law, the grants are to be used for “well-rounded educational opportunities” and at least 20 percent of the total funds are supposed to be used to support “safe and healthy students”. Qualifying services include school-based mental health programs and suicide prevention. While this flexibility is appreciated, the appropriation is still \$500,000 below the amount authorized for this block grant.

As you continue to deliberate, we urge you to support the inclusion of new money in the 2019 budget, and want to stress the importance of making that funding flexible and available to all public school districts. This funding must be able to be used to support a variety of services including, but not limited to, staff training, hiring of school resource officers, and the expansion of mental health programs. It is important that access to funding is not contingent upon a district’s adoption of a specific approach to school safety and security. It is also critical that programmatic money is not diverted away from existing student services to school safety efforts.

In addition, districts need resources to invest in security related infrastructure. NYSSBA supports the establishment of a capital funding program that would provide grants, low interest loans and federally backed bonding capacity that would allow school districts to make much needed infrastructure improvements related to school safety.

Furthermore, NYSSBA would like to stress the benefits of Medicaid funding in schools. Districts rely on Medicaid revenue to pay for nurses, therapists and other key personnel that provide IDEA services for students with disabilities and critical health services to students in poverty, including counseling. In New York State, more than 450,000 school-aged children with disabilities receive some form of special education programming or services annually funded through Medicaid. Medicaid funded services provided in schools contribute to fewer absences, better grades, higher likelihood of on-time graduation and even higher earnings for students after they have graduated. Medicaid funding plays a vital role in ensuring that school districts have the resources to support all students in achieving success. Supporting the overall well-being of the whole child is critical for efforts to improve the culture and safety of a school. Therefore, it is vitally important to the public school districts of New York that Medicaid reimbursement is not restructured to enact per-capita caps or block grants that no longer reimburse schools for the services they provide for students. This move would almost certainly result in reduced Medicaid funding to schools and in turn disadvantage our most vulnerable students who need these extra supports the most.

As discussions on this important topic continue, NYSSBA encourages policymakers to ensure that school districts have the resources and supports they need to provide students the sound basic education they are entitled to, in a safe and secure environment.

Ms. Betsy DeVos

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If you require additional information, please do not hesitate to contact me at (518) 783-0200 or tim.kremer@nyssba.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy G. Kremer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Timothy G. Kremer
Executive Director

cc: Jeff Sessions, Attorney General of the United States
Alex Azar, Secretary of Health and Human Services
Kirstjen M. Nielsen, Secretary of Homeland Security
Deborah Rigsby, Program Director, Lobbying & Federal Legislation, NSBA
NYS Congressional Delegation