Nicole White
United States Department of Education
400 Maryland Avenue SW, Room 3E326
Washington, DC 20202

Re: Federal Register Proposed Priorities, Requirements, and Definition--Project Prevent Grant Program, Docket ID ED-2021-OESE-0122

Dear Ms. White,

We write on behalf of Advancement Project National Office and the Alliance for Educational Justice to respond to the request for comment regarding the proposed priorities, requirements, and definition for the Project Prevent grant program. In our comment, we raise concerns about aspects of the program that could promote harmful practices and highlight what it would take to make our schools places of healing that can adequately respond to student experiences of community violence.

Advancement Project National Office is a racial justice organization based in Washington, D.C. Our education work envisions a future in which Black students and other students of color have the self-determination to create the liberatory schools of their dreams. Our vision for liberatory education is rooted in abolition and abundance. We believe public schools are a public good under control of the community and should be fully resourced to ensure that not only are students' mental and physical needs met, but that they experience power, dignity, freedom, creativity, experimentation, wholeness, wellness, nurture, and care. The Alliance for Educational Justice is a national network of 35 youth and intergenerational organizing groups of color across 12 states and 14 cities dismantling the school-to-prison pipeline. Our organizations have partnered with grassroots organizations across the country to fight for the schools we believe are possible for our communities. Together, we co-lead the National Campaign for Police Free Schools (policefreeschools.org).

The background information for the Project Prevent program describes the long-term physical, psychological, and emotional harms of community violence, including as a risk factor for adverse childhood experiences (ACEs). This leads into the proposed priorities, which envision schools as a hub for resources, referrals, and community-based partnerships to address the impacts of community violence. These priorities presuppose that violence and trauma come in specific forms that are isolated to the community and that schools are a place of healing and support for that trauma.

Unfortunately, this assumption does not match the reality of too many young people. First, the specific types of violence named in the definition of "community violence" are underinclusive of

many forms of interpersonal community violence faced by students, such as street harassment, sexual harassment, and emotional abuse. This trauma that students experience in the community is then met and matched by trauma they experience in school. This includes trauma under the ACE scale's narrow definition of trauma as well as the trauma of everyday experiences of racism, discrimination, and oppression. When a student's experience of school is one of policing (both literal police presence and policing of their body and actions), surveillance, punishment, and lack of support, this experience will undermine the trust required to then look to their school as a place of healing and support when they experience violence in the community.

One devastating example of this school-based trauma is the number of assaults on students by school police officers. Since 2007, we have logged almost 200 assaults by school police officers on students, primarily Black students, other students of color, and students with disabilities, with at least 20 assaults occurring in the fall of 2021 alone.[1] These assaults are only the ones that make the news and that we are aware of; the true number of assaults is likely higher.

Given these assaults and other harms of school policing,[2] we are concerned that the Project Prevent grant program includes "undertaking activities in collaboration and coordination with law enforcement" as a proposed project activity. Too often, even when victims of harm or violence seek help from law enforcement, they end up re-victimized and policed themselves by law enforcement. This is especially true for survivors of sexual violence, who are both disbelieved and punished for their survival. Students who experience community violence do not need to experience further trauma at the hands of law enforcement, and law enforcement has no place in a program designed for healing.

In addition to our concern about providing any role for law enforcement, we want to ensure that the process of identifying students for services under this grant program does not rely on harmful biases. In the project activities and "Evidence-based, culturally competent, and developmentally appropriate programs and practices" sections, there are several references to either "screening" or "targeting" students, including targeting for mentoring individual students "who are at a higher risk for committing or being a victim of violence." We are concerned that such "screening" or "targeting" measures, especially if left open for the LEAs to decide, will either explicitly rely on criteria not based in reality—such as the false idea that students with mental health concerns are more likely to commit violence—or that in the absence of explicit measures, school staff will make biased assumptions about students based on their race, gender, sexual orientation, and/or disability.

We also want to ensure that students who have experienced community violence do not end up directed to systems that will further harm them, even if such placement is well-intentioned. This is of special concern when the project activities section includes referrals for mental health

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[1] #POLICEFREESCHOOLS, #ASSAULTAT MAP, available at https://policefreeschools.org/map/ (last visited February 11, 2022).

[2] ADVANCEMENT PROJECT AND ALLIANCE FOR EDUC. JUST., WE CAME TO LEARN: A CALL TO ACTION FOR POLICE-FREE SCHOOLS (2018), available at https://advancementproject.org/wp-content/uploads/WCTLweb/index.html#page=1.

treatment. To start, we would not want this program used to send any student to mental health treatment involuntarily, especially based on biased screening/targeting measures. Additionally, much mental health treatment still views the individual as the problem—or as merely a set of symptoms to be treated.[3] Mental health support should instead validate the individual's experience and provide space to consider the conditions that are causing them to experience distress, as well as the social supports needed to lessen the distress. Mental health services and supports can make an enormous difference for students, but they must be designed with intention and care so as not to cause further harm and trauma.

Youth who experience community violence need schools that are places of healing. One major step toward accomplishing that is to end school policing and surveillance. Schools cannot address trauma with trauma. For this program to be truly successful, it should include a requirement that schools receiving the funds take steps to eliminate school policing. That will allow this program to take root in a safer environment and have a real chance of success.

In addition to removing school police, schools can be places of healing through these practices:

- <u>Investments in school-based restorative justice practitioners from the community, who are not a part of law enforcement</u>: When implemented with fidelity to the original principle of building relationships before harm has happened, and asking the foundational questions of restorative justice, restorative practices can have positive effects on school climate and potentially on students' ability to trust their schools as resource hubs.[4] When members of the local community who reflect the racial and cultural background of the student body are able to provide restorative justice programming and practices, it has the potential to reduce the harm of exclusionary discipline in schools and prevent violence in communities.[5]
- <u>Supporting community-based violence interruption programs that are not working in coordination with law enforcement</u>: There are credible messengers in every community that are often familiar with students, their families, and their needs. Violence-interruption programs that rely on community members who are not

working in collaboration with police or immigration officials can support healing and safety for communities that are disproportionately impacted by violence.

- <u>Preventing school-based sexual harassment and assault through consent-based, LGBTQ affirming, sexual health education</u>: School-based sexual harassment and assault is a pervasive problem, that often focuses on punishing girls and gender-nonconforming youth for being victims of assault, or for fighting back.[6] According to the Georgetown Law Center on Poverty and Inequality, Black girls are viewed (by educators) as ". . . less innocent and more adult-like than their white peers." Black girls are viewed by the educators surveyed in the study as less in need of protection and more knowledgeable about sex than their peers.[7] This could indicate that when Black girls, including transgender girls, and non-binary youth look to schools as sources of safety from community-based sexual violence, they are likely to be met with punishment and disbelief. While the proposal focused on interventions and activities available to students to prevent "negative or violent behavior" including sexual assault, a critical solution is to both address systemic racism and racist attitudes amongst educators and school administrators, as well as invest in curricula that teach students, adult staff, and educators about bodily autonomy, consent, and healthy dating relationships.[8]

- <u>School-based mental health services</u>. 14 million students attend schools with police but no counselor, nurse, psychologist, or social worker, and 90% of schools fail to meet the recommended ratio of at least one counselor and one social worker for every 250 students and one nurse and one psychologist for every 750 students.[9] Providing school-based mental health services may include hiring these mental health professionals and/or coordinating with community-based mental health professionals to facilitate practices such as peer support circles for students. Peer support is a strong tool to promote mental health and healing from trauma, and qualified, culturally responsive facilitators can make an enormous difference for youth. Counselors should also be available to provide one-on-one support as needed, always on a voluntary basis.

We appreciate the opportunity to offer this comment on the proposed Project Prevent grant program and hope our feedback can be helpful in realizing the broader goal of ensuring schools can be places of healing for all students. We also acknowledge that truly providing the support

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[6] GIRLS FOR GENDER EQUITY, THE SCHOOL GIRLS DESERVE: Youth Driven Solutions for Creating Safe, Healing, Affirming New York City Schools 23 (2016) available at https://dignityinschools.org/resources/the-school-girls-deserve-report/. Monique W. Morris, PUSHOUT: THE CRIMINALIZATION OF BLACK GIRLS IN SCHOOLS, 2016. "At nearly 19 percent, the rate of sexual victimization for Black girls and young women is among the highest for any group in the nation. Girls experience sexual assault, objectification, or being seen as hypersexual in many places – including their homes, in the street, ... and in schools" p. 121.

[7] Rebecca Epstein & Jamila Blake, Thalia Gonzalez, *Girlhood Interrupted: The Erasure of Black Girls' Childhood*, Georgetown Law Center on Poverty and Inequality (2017).

[8] John S. Santelli *et al.*, *Does sex education before college protect students from sexual assault in college?,* COLUMBIA UNIVERSITY MAILMAN SCHOOL OF PUBLIC HEALTH, November 2018, page 2, available at: https://doi.org/10.1371/journal.pone.0205951.

[9] ACLU, COPS AND NO COUNSELORS (2019), available at https://www.aclu.org/report/cops-and-no-counselors.

students need calls for much greater investment than the size of this program, and we call for these investments to be made at every opportunity. If you have any questions, please contact Noelia Rivera-Calderón at nriveracalderon@advancementproject.org or Ashley Sawyer at asawyer@advancementproject.org.

Sincerely,

Judith Browne Dianis
Executive Director
Advancement Project National Office

Jonathan Stith
Alliance for Educational Justice