



## ♥ Ensuring a Place at the Table for Every Family

March 27, 2023

Rene Bradley  
U.S. Department of Education  
Washington, DC 20002

RE: Proposed Priority and Requirements – National Technical Assistance Center on Positive Behavioral Interventions and Supports

Dear Ms. Bradley:

On behalf of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE), we wish to thank the US Department of Education (the Department) for its continued efforts to ensure access to a high quality, equitable education for all students, including those who themselves or whose parents have limited English proficiency (LEP) and those who have disabilities, special healthcare needs, mental health challenges, or who face discrimination or barriers to access on the basis of race, ethnicity, immigrant status, language, socio-economic status, LGBTQ+ status, or other characteristics. National PLACE and our 70 local, state and national member organizations are committed to ensuring that families and family-led organizations are at the table when decisions regarding children and families are being made, and that our voices meaningfully influence those decisions. Our members are parent-led, family-serving organizations including Parent Centers (Parent Training and Information Centers and Community Parent Resource Centers), Family to Family Health Information Centers, Federation of Families for Children’s Mental Health chapters, and Parent to Parent USA affiliates, among others. Most of our members provide information, training and support to families of children, especially those who face the greatest challenges due to disability, mental health challenges, poverty, discrimination based on race/ethnicity, and language barriers. Our comments are based on the direct experience of our members in serving children and families who face disproportionately harsh discipline and who have inequitable access to high quality social-emotional learning.

Overall, National PLACE supports the proposed priority and requirements for a National Technical Assistance (TA) Center on Positive Behavioral Interventions and Supports (PBIS). We agree with the Department that “[m]any students need additional supports to address social, emotional, and behavioral challenges that impact their full access to and participation in learning,” and that “[t]hese challenges, if not properly addressed, can lead to student responses that are inconsistent with school or program expectations.”

Based on our members’ experience, it is clear that “the COVID-19 pandemic exacerbated these challenges, accelerating the need to provide school-based social, emotional, behavioral, and mental health supports and leverage the existing evidence base about how to provide nurturing educational environments to meet the needs of our nation’s youth.”

Further, based on the experiences of our members supporting families as they advocate on behalf of their children, National PLACE also agrees that “students from underserved groups are more likely to experience exclusionary discipline” and that “disproportionality in discipline grows when considering race, gender, and disability,” including the reality “that students of color, particularly Black students, Native students, and Black students with disabilities are significantly more likely than their non-disabled, or white peers to be subjected to exclusionary discipline practices, including office discipline referrals and suspensions.” Our members are also keenly aware that “[w]hen students are denied access to instruction and participation in school opportunities, they are more likely to experience negative outcomes in school and later in life, including poor academic outcomes, lower graduation rates, incarceration, and employment and relationship challenges,” and that the “lack of culturally and linguistically inclusive pre-service and in-service training for teachers and leaders on effective practices for creating positive, safe learning environments” is a barrier to “reducing exclusionary and aversive discipline practices for students, including students of color and students with disabilities.

Based on the experience of our members who, in many jurisdictions, are involved in efforts to implement the PBIS framework, National PLACE agrees that this framework “has provided an effective multi-tiered structure through the implementation and examination of systems, practices, and data to assist LEAs and schools in addressing inequities,” and that “[w]hen there is fidelity in implementing evidence-based practices (EBPs) to prevent, reduce, and mitigate interfering behaviors within a PBIS framework,” there are statistically significant improvements in “perception of school safety; reductions in overall behaviors that are inconsistent with classroom or school expectations and that interfere with learning; and reduction of bullying behaviors, office discipline referrals, chronic absenteeism, and suspensions.”

Thus, National PLACE strongly supports the continuing need to fund a national TA center to assist states, districts and schools to implement the evidence-based PBIS framework within a context of increased focus on equitable implementation and equitable outcomes. We also support the increased focus on “(1) students with more intensive social, emotional, behavioral, and mental health needs and those most likely to be excluded from the learning environment due to behavior that interferes with learning; (2) pre-service and in-service training on culturally and linguistically inclusive practices that support students from underserved groups;

(3) improving implementation fidelity; and (4) addressing other systemic inequities such as access to school funding, experienced educators, and advanced coursework opportunities,” as well as the focus on helping State educational agencies (SEAs) and Local educational agencies (LEAs) “to develop, expand, and sustain school-wide frameworks and to build personnel capacity and expertise to promote safe, positive, predictable, and culturally and linguistically inclusive learning environments where students feel a sense of belonging.” We also support the focus on “increasing the use of EBPs to more effectively support and respond to student needs, such as teaching school and classroom expectations, building classroom cultures of respect and belonging, and implementing trauma-informed practices,” and on “using EBPs to reduce the use of restraints seclusion and corporal punishment; chronic absenteeism; incidents of bullying; the disproportionate application of disciplinary procedures, such as suspension and expulsion, for students, including students of color and those with disabilities; unnecessary referrals of students to law enforcement; and violent and traumatic school incidents.”

National PLACE also endorses the focus on implementing the PBIS framework in settings ranging from early learning programs through high schools, and the explicit inclusion of career and technical education programs, alternative schools and programs, juvenile justice system or correctional facilities, low-performing schools, schools with a high student-to-mental-health provider ratio, schools with high rates of chronic absenteeism, exclusionary discipline, referrals to the juvenile justice system, bullying/harassment, community and school violence, or substance abuse, schools in which students recently experienced a natural disaster, incident of violence, or traumatic event, and schools with high percentages of students with disabilities.

National PLACE supports the identified expected outcomes, including:

“(a) Improved systems and resources at the national, regional, State, and district levels to support, develop, align, and sustain local implementation of MTSS/PBIS efforts to organize EBPs to support positive school climates and respond to student social, emotional, behavioral, and mental health needs to improve access to and engagement in learning.

(b) Improved capacity of SEA and LEA personnel to support the knowledge and skills development of school personnel to implement MTSS/PBIS as a framework to organize EBPs to support and respond to student needs, particularly those from underserved, culturally and linguistically diverse backgrounds, and those whose behaviors may interfere with a student's ability to fully participate in, and benefit from, a high-quality learning environment.

(c) Increased use by SEAs, LEAs, and school-based personnel of reliable and valid tools and processes for enhancing and assessing the fidelity of implementation of a MTSS/PBIS Framework and for measuring intended outcomes, including improvements in school climate; time spent on instruction; well-being and belonging; overall academic achievement; and reductions in absenteeism, discipline referrals, suspensions, expulsions, the use of restraints or seclusion, illegal use of drugs, and referrals to law enforcement.

(d) Improved implementation of a MTSS/PBIS framework, EBPs, and assessment of SEA or LEA recipients of grant programs that focus on improving positive school climates and implementing EBPs to support and respond to students' social, emotional, behavioral, and mental health needs.

- (e) Enhanced response and recovery assistance, as requested by and in collaboration with the Department, for violent or traumatic incidents that impact school communities, including intensive individualized support to facilitate recovery of the learning environment.
- (f) Increased body of knowledge and evidence to enhance implementation of PBIS and other emerging MTSS frameworks and EBPs to address the social, emotional, behavioral, and mental health needs of students in the settings established in the priority.”

We also support the proposed requirement to “ensure equal access and treatment for members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age or disability,” but would strongly urge the addition of gender identity/LGBTQ+ status, limited English proficiency/language status, and socio-economic status.

### **Recommended Revisions**

National PLACE also urges the Department to specifically include in the requirements regarding description of the Center’s approach to universal, targeted, and intensive technical assistance a requirement to address how it will provide universal, targeted, and intensive TA to families, especially underserved parents whose children are most often subjected to discipline, and the Department’s investments in family engagement – Parent Centers (including Parent Training and Information Centers-PTIs and Community Parent Resource Centers-CPRCs, who serve families of children with disabilities or at risk of inappropriate identification, often based on race, ethnicity, language, etc.) and Statewide Family Engagement Centers (SFECs). In the experience of our members, it is often parents and the organizations that support them to advocate on behalf of their children, such as Parent Centers, who are the ones who advocate for the adoption of evidence-based and equitable practices, as well as the National (Center for Parent Information and Resources) and Regional Parent TA Centers that build capacity of Parent Centers. The intended beneficiaries of this initiative – including students and parents with lived experience – must have significant input into all aspects of the initiative, from development through implementation through evaluation and continuous quality improvement.

This recommendation is not met by the provision that applicants must present a proposed plan for “working with appropriate levels of the education system (e.g., SEAs, regional TA providers, LEAs, schools, families) to ensure that there is communication between each level and that there are systems in place to support the use of PBIS.” (In addition, the term “regional TA providers” is not clear. Is this intended to cover within-state regional TA providers? Cross-state regional TA providers? Some other entities?) The priority must explicitly require engagement of and collaboration with both PTIs and CPRCs and their TA providers, and SFECs.

This requirement should be explicitly included in the discussion of a “dissemination plan that describes how the applicant will systematically distribute information, products, and services to varied intended audiences, using a variety of dissemination strategies, to promote awareness and use of the Center's products and services” by these important audiences.

The provision requiring applicants to demonstrate how the “proposed project will benefit from a diversity of perspectives, including those of families, educators, TA providers, researchers, and policymakers, among others, in its development and operation” must also explicitly include benefiting from the perspectives of those Department investments in family engagement, including Parent Centers, SFECs, the CPIR, and Regional PTACs. We would also encourage this provision to include explicit reference to benefiting from the perspectives and experiences of Equity Assistance Centers, the Department’s primary investment in equity in education.

The budget section must include a requirement to include as funded partners one or more of the entities that provide TA and support to the Department’s investment in family engagement.

National PLACE also urges the Department to include in the list of members of the 3+2 review team not only those with experience and knowledge in PBIS, but also those with experience and knowledge in active implementation and those with experience and knowledge in family engagement including engagement of the most underserved populations such as families of children with disabilities, families of color, immigrant and LEP families, and low-income families. If the TA to be provided by the PBIS TA Center is to be useful to families, then those with expertise in reaching and working with families must be included in the 3+2 review.

National PLACE also notes that applicants should be required to describe how they will develop resources and tools, and use dissemination strategies, that are able to be easily accessed and used by those on the ground who are, in the end, responsible for implementation of PBIS – families, students, and the professionals who serve them. Long narrative guides, complicated tools with inaccessible language, and other traditional formats, are not able to be easily used in the field. Short videos, clear-language materials at a lower reading level, and other approaches are more effective. In addition, communities of practice or other ongoing methods of providing coaching and support for implementation should be expected deliverables. Finally, there must be sufficient emphasis on the universal TA that the benefits of the TA center will not be limited to a handful of states, districts or schools.

In conclusion, we appreciate the opportunity to comment on the need for and requirements of a national PBIS TA center. For any questions or for additional information about this letter, please contact Diana Autin, Executive Director of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE), at [dautin@parentsatthetable.org](mailto:dautin@parentsatthetable.org). Thank you in advance for your thoughtful consideration of our recommendations.

Sincerely:



Diana MTK Autin

On behalf of National PLACE