



*Parent Education Organizing Council,  
(P.E.O.C.)*

*152 Market Street, Suite 208  
Paterson, NJ 07505*

August 21, 2017

Docket No.: ED-2016—ICCD—0147

Dear Ms. Valentine:

As a [student/parent/advocate/stakeholder] I urge the Department of Education to maintain the current Civil Rights Data Collection by preserving the existing questions, requiring all schools and districts to report the data, and continuing to make the CRDC accessible to the public. We found the data from CRDC around “out of school suspension” to be alarming for our Black and Brown boys. The State of New Jersey was not collecting this data but we felt there was a need for it to be addressed. We did a report to show the disparities in suspensions in our district and as a result the district formed a committee to address the problems. We were able to get the superintendent and school board members to stop suspending kids for minor infraction until there could be alternatives put in place cut back on those out of school suspensions.

The Department is proposing to change the 2017-2018 CRDC to reduce the burden on school districts. However, the Department’s primary goal must be to collect all the data needed to ensure that schools and districts are upholding the civil rights of all students, especially students of color and other student groups that often face discrimination, including students with disabilities and students who identify as Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ). Communities must also have all the information they need to accurately assess the quality of their schools and districts and to support local efforts to advocate for improvements when needed. Thank you for considering the following recommendations:

**I. Collect data on police use of force against students**

The Department should collect data on police use of force against students including: number of students subjected to pepper spray, tasers, physical attack (e.g. tackling, body slamming, etc.), and number of students injured or killed by a firearm. Data on police use of force against students would provide education officials and community member’s additional information on the impact of school police on students’ well-being and school safety, as well as provide additional evidence to support local efforts to end the regular presence of police in schools.

**II. Disaggregate discipline data by reason for the disciplinary action**

Students of color, students with disabilities, and students who identify as LGBTQ are often disproportionately disciplined for minor, subjective offenses such as disobedience and disruptive

behavior. The Department should disaggregate all data on practices that push students out of the classroom (e.g. in- and out-of-school suspensions, expulsions, referrals to law enforcement, and school-related arrests) for this reason. This will provide important information about how many and which students are disciplined for non-violent, subjective offenses. These data would help to show if trainings for school staff and school administrators, as well as other interventions, are needed to prevent and address discrimination.

### **Collect data on the use of alternative discipline practices**

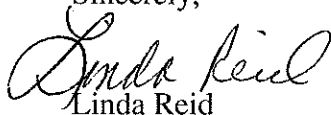
Schools and districts should indicate whether or not they are implementing restorative practices or School-Wide Positive Behavioral Interventions and Supports. This would allow comparisons of discipline rates and disparities between schools and districts implementing these approaches and those that are not, which would provide families and community members the evidence they need to advocate for these practices in their own communities.

### **III. Ensure that all discipline data is disaggregated by race, sex, disability, and LEP and is reported on an annual basis**

Some of the CRDC's data elements related to school discipline are not disaggregated by race, sex, and Limited English Proficiency. This leaves out important information about the outcomes for several student groups. The Department should fully disaggregate all data elements related to discipline to ensure that outcomes for all student groups are tracked.

The Department should also collect data through the CRDC each year. Current data is needed to identify and address disparities as soon as possible to limit the negative impact on students. Ensuring that families, community members, and advocates have access to the most recent data would also prevent school and district officials from claiming that issues from previous school years have been resolved when older data is used to advocate for improvements.

Sincerely,

A handwritten signature in cursive script that reads "Linda Reid".

Linda Reid  
Organizer