

September 12, 2023

School Safety and Security Policy Recommendations Oakland Schools Written Testimony

Submitted By David Randels, Executive Director, Government Relations, Education Policy and Research

To the Michigan House Education Committee and Members of the Legislature

Thank you for holding a hearing regarding the critical issues related to school safety and security. Oakland Schools appreciates the opportunity to submit written testimony on the topic.

Oakland County education leaders regularly engage law enforcement, physical and mental health providers, staff, students, and others in our efforts to provide the safest and most supportive learning environments for our PreK-12 students. Our ISD and Oakland County Sheriff Bouchard jointly sponsored a School Safety Summit to help build bridges between the various local police departments that serve and often overlap multiple local districts and our local school district leaders and staff. The Oakland County Superintendents Association (OCSA) has a School Safety Committee to help share resources and foster discussions on this issue.

We appreciate the efforts of the bi-partisan House School Safety Committee—formed after the devastating tragedy in one of Oakland's 28 local school districts in November 2021. We are also following the work of the State School Safety Commission, and we encourage policymakers to continue to support efforts that bring together subject matter experts on these topics for state-level review and discussion.

Legislative and state policymakers must do more to support and protect our students, employees, and communities. When considering the numerous policy options before us, we urge the legislature to put the interests of our students and those who work and depend on our schools first. Far too much is at stake to allow political convenience to drive the discourse and decision-making.

The most significant threats to our schools and students continue to come from outside the school and the direct locus of control for school leadership and personnel. School safety-related public policy solutions that do not directly address these external factors outside the school's authority will be symptomatic solutions. The greater the distance between any public policy solution to the core problem and the prescribed remedy, the greater the diminished return on investment in time and resources.



The state should craft policy solutions flexibly to allow local communities to best meet specific local needs and challenges. We strongly encourage policymakers to resist reactionary responses. Education leaders implore you to reject impulsive mandates for school safety product purchases and other one-size-fits-all solutions.

A critical part of defining school safety is including attention to both the physical security and the psychological safety of our school environments. Explicitly stating and addressing both components of school safety is essential from a systemic lens. Both physical and mental health supports are needed for fostering safer school environments. One can only be addressed with the other, and it is recommended that they equally be discussed in tandem systemically through a multi-tiered system of support (i.e., planning and prevention, intervention, and intensive supports).

For generations, Michigan has been woefully falling behind the necessary investment levels to provide every student, regardless of zip code, a safe physical place to attend school. In the years to come, this problem will only continue to worsen. It is time for a concerted, systemic approach to our school infrastructure needs, especially regarding physical safety. The state should maintain consistent funding for school physical infrastructure improvements by utilizing a formula that allows each community to access resources.

We urge the legislature to review whether new statutory requirements should be created regarding which state agencies have specific responsibilities to communicate with school district leadership about potential and active threats to school operations. It is time to review corporate and technology industry actors' role in alerting and assisting law enforcement's efforts to protect schools.

Protecting students and employees from cybersecurity threats should also be a priority for policymakers. We support measures that protect student and employee data and the inappropriate release of that data to state and private actors; comprehensive and aligned supports to protect districts, students, and employees from ransomware and cyber-attacks; and allow bond and sinking fund dollars to be used for cybersecurity services.

We must be more intentional with how the state will sustainably fund school mental health/behavioral health supports and structures moving forward. We must move away from "short-lived/immediate response" funding plans and instead move into long-term proactive systemic funding and infrastructure planning. The short timelines of grant cycles challenge districts and preclude serious long-term planning.



A statewide articulated plan is needed to support districts with budgeting and hiring the recommended staffing ratios for students to behavioral mental health providers. Yes, we are in a current mental health provider shortage. However, districts need support and funding around providing professional development and retention supports for these critical staffing roles. That being said, there is a need for a statewide articulated plan for developing college-career pathways to not cut corners for school-based mental health providers for licensing and credentialing.

Superintendents and school leaders in Oakland County urge the legislature to make significant investments in our community mental health systems, move quickly to address the critical staffing crisis we are experiencing related to school mental health support, and invest in residential services and inpatient beds for our students in need.

In August of this year, the Learning Policy Institute released the report Safe Schools, Thriving Students: What We Know About Creating Safe and Supportive Schools. In the report, authors Jennifer DePaoli and Jennifer McCombs present seven "Recommendations for Policy and Practice" for states and districts to consider based on research and evidence. Below are those recommendations with suggestions from Oakland Schools school safety experts on how best to organize the policy response in Michigan and at the local and community levels.

1. Increase student access to mental health and counseling resources. States and districts can allocate Bipartisan Safer Communities Act (BSCA) and federal COVID-19 recovery funds, as well as other federal, state, and local funds, to hire more school counselors and other mental health professionals and make plans now to maintain those staffing levels when one-time funds expire. They can also invest in external partnerships with community mental health providers, who can provide school-based or telehealth services for students.

One example is the utilization of the appropriations in Section 31n of the State School Aid Act to provide school districts with a scaffolded funding stream to increase school-based behavioral health providers for providing services to general education students in need of behavioral and mental health-related services. 31n funds allow districts to recoup funding by participating in Caring 4 Students (C4S) through the State of Michigan Medicaid Expansion. Additionally, the funding structure will enable districts time to develop long-term sustainable financing for retaining school behavioral/mental health positions. While any remaining state COVID-19 dollars should be considered for these efforts, we strongly recommend adopting long-term sustainable investment policies.

2. Invest in integrated student support systems and community schools to connect students and families to needed supports. Integrated student supports that address physical and mental health, as well as social service needs, help create a personalized,



systemic approach to supporting students. For state and district leaders, this means adopting and supporting comprehensive, multi-tiered systems of support to provide students with universal supports for their well-being (such as advisories and social-emotional learning programs that support relationships) and include a well-designed system for adding more intensive, individualized interventions (such as counseling, tutoring, or specific services) as needed. Community schools integrate by design a range of supports and opportunities for students, families, and the community to promote students' physical, social, emotional, and academic well-being.

Integrated student support systems and community schools begin with supporting all adult educators. Adult educators require knowledge and training around mental health literacy awareness and their districts' crisis and non-crisis referral pathways for referring students needing social, emotional, and behavioral support. This is necessary because classroom teachers and support staff are the "first line of defense" in a tiered service delivery system at the universal/Tier 1 level. Teachers and support staff in classrooms are often the first to identify a student's need and refer them for additional support and services, thus requiring them to have formalized awareness and training. The integrated student support systems and community school approach align with the "whole-child" approach.

3. Adopt structures and practices that foster strong relationships. At the school and district levels, leaders can adopt structures and practices (e.g., advisories, small learning communities, looping, allocated time to create strong school–family connections) that foster secure relationships and provide teachers time to know their students and their families well. State and district leaders can further support relationship-centered school designs by removing impediments to these structures and practices that can exist within traditional staffing allocations, schedules, and collective bargaining agreements. They can also provide time, funding, and support for schools to implement advisories and other relationship-centered school designs that promote learning and development.

Meaningful feedback and input from families and the community is a driving practice for fostering inclusion and strong relationships within diverse school communities and creating sustainable systems addressing school safety.

4. Invest in restorative practices and social and emotional learning. School, district, and state leaders can support young people in learning key skills and developing responsibility for themselves and their communities by replacing zero-tolerance school discipline policies with policies focused on explicit teaching of social-emotional strategies and restorative discipline practices.

As referenced above, developing robust school safety systems of support begins with addressing the needs of our adult educators. Educators need opportunities for



developing and furthering their learning around skills that support staff well-being and retention (i.e., self-awareness skills, self-management skills, social awareness skills, relationship skills, and responsible decision making skills).

5. Prepare all school staff to better support student well-being. All adults working in schools need preparation and support to consistently support students' social and emotional development, develop positive relationships, recognize students in need of greater mental health support, and enact restorative practices. States can support professional learning around student safety and well-being through revisions to educator preparation program approval standards, licensure standard competencies, and inservice professional learning and development. Additionally, states can establish guidance for the appropriate use of school mental health staff, paraprofessionals, and other school staff, as well as criteria for hiring, training, and continuous evaluation of their performance and roles. In schools employing school resource officers or law enforcement personnel, school and district leaders should ensure they have clearly defined responsibilities, avoid engagement in daily discipline, and have the training and support necessary to effectively support students.

We recommend required and fully funded, evidence-based universal mental health awareness training for all school staff. This recommendation aims to provide adults with the knowledge and immediate tools to support them in recognizing the signs and symptoms of a student in crisis and the appropriate steps to help the student. Furthermore, school-based behavioral health provider evaluations should be aligned to their national organizations' school practice models (i.e., NASP, NASW, and ASCA) rather than evaluating their services and work based upon a teacher evaluation model (i.e., Marzano, Danielson).

6. Incorporate measures of school safety and student well-being in state and federal data collection. While there are many efforts to collect school safety data, existing sources only provide pieces of the school safety picture. A federally driven, systematic data collection that provides more detailed data on safety measures (e.g., roles of school resource officers), strategies to build supportive school communities, and educator practices that support positive school climate and student well-being by the federal government could give researchers and policymakers a more complete understanding of what schools are doing to create safe and supportive learning environments.

Important state data collection requires the administration of the Michigan Profile for Health Youth (MiPHY) (full version) for capturing student voices and needs around health risk behaviors and protective factors; the MiPHY is currently voluntary. This anonymous data collection supports multi-tiered system of supports around school safety and behavioral health. Local community partners also utilize this data to support their community service planning. Lastly, the data gained from the MiPHY (full version) helps



with community resource mapping for students and families. This will ensure access to the appropriate referral services and interventions for our students and families.

7. Conduct equity reviews of school safety measures and their impact on discipline outcomes. Research has found that some efforts to improve school safety, such as the hiring of school resource officers, are sensitive to bias, particularly toward Black students and students with disabilities. To identify bias in implementation, schools, districts, and states can review disciplinary action data to track whether school safety measures are associated with increased use of exclusionary discipline and police referrals, particularly for Black students and students with disabilities. States and districts can also support schools in conducting equity reviews to track whether school safety measures have unintended consequences for students.

A statewide-level articulated infrastructure is needed on several levels to support our school communities' physical and psychological safety. Any future policy should have embedded outcome assessments at critical points. These assessments must include robust equity reviews to ensure all communities benefit from the investments and the policy initiatives.

Thank you for considering our input on this critical matter. We are ready to partner with the legislature and key policymakers to implement the above evidence-based recommendation.