



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

NONREGULATORY GUIDANCE: SCHOOL DISCIPLINE

I. BACKGROUND

The Office of the State Superintendent of Education (OSSE) is issuing this guidance to assist local educational agencies (LEAs) in meeting their obligations with federal and local laws and regulations regarding administration of student discipline. In order to ensure that all students are provided with equal access to educational opportunities, it is important to avoid student discipline that is discriminatory and to create learning environments that will allow students to thrive. It is OSSE's hope that the issuance of this non-regulatory guidance will provide a resource for individuals in a range of roles in schools throughout the District of Columbia as discipline policies are created and put into practice that are effective and do not result in discrimination toward, or a disproportionate impact on, any group of students.

In meeting this goal, schools should be aware of the particular concerns surrounding disproportionate discipline of African American students, students with disabilities, and lesbian, gay, bisexual, transgender, and questioning (LGBTQ) youth.

A recent US Department of Education (USED) data collection revealed that African American students are suspended or expelled at a rate three times (3) higher than their Caucasian peers¹. In addition, a USED review of national Individuals with Disabilities Education Act (IDEA) discipline data submissions from 2012 through 2014 revealed that close to 900 LEAs gave African American students with disabilities short term out-of-school suspensions at least two (2) times as often as all other students with disabilities. Last, studies show that LGBTQ youth are more frequently subject to discipline practices that exclude them from the classroom than their peers, and account for as much as fifteen (15) percent of the youth in the juvenile justice system.² OSSE is committed to supporting schools as they work to protect the rights and safety of all students, and to ensure that discipline practices are carried out in a nondiscriminatory manner that effectively addresses the underlying causes of misbehavior.

Although local regulations on student discipline, found in Title 5-B, Chapter 25 of the District of Columbia Municipal Regulations (DCMR), apply only to the District of Columbia Public Schools (DCPS), this document provides guidance from the U.S. Department of Education and other jurisdictions that can provide helpful information for all LEAs. It is recommended that public charter schools ensure that all independently-developed policies and procedures contain, at a minimum, equivalent sections: grounds and policy for disciplinary action; procedures for suspensions and expulsions; procedures for disciplinary hearings; and discipline of students with disabilities. That recommendation notwithstanding,

¹ US Department of Education Office of Civil Rights. (2014). Civil Rights Data Collection: Data Snapshot (School Discipline). Available at: <http://ocrdata.ed.gov>.

² Office of Juvenile Justice and Delinquency Prevention. (2014). LGBTQ Youths in the Juvenile Justice System 2, 4. Available at <http://www.ojjdp.gov/mpg/litreviews/LGBTQYouthsintheJuvenileJusticeSystem.pdf>

discipline policy and practice is determined by each charter LEA. This document is intended to assist all LEAs in developing policies that are effective and compliant as related to student discipline and hearing or appeal rights.

Finally, given the potential consequences of excluding students from school, OSSE recommends that exclusionary discipline be considered for only the most serious offenses committed by students. Studies suggest a correlation between exclusionary discipline practices and serious educational, economic, and social problems in a student's life.³ It is imperative that students have the opportunity to learn. OSSE is available to provide technical assistance to support LEA efforts to maintain safe and successful schools.

³ US Department of Education and US Department of Justice. (2014). Dear Colleague Letter: Nondiscriminatory Administration of School Discipline.

II. OVERVIEW OF FEDERAL LAWS THAT AFFECT SCHOOL DISCIPLINE

The federal laws highlighted in this section are intended to provide background information regarding certain prohibited practices. Much of the applicable federal law on this topic focuses on discrimination; federal law does not prescribe practices that can or must exist, but rather describes the circumstances under which various forms of discrimination cannot occur. Additionally, it should be noted that while there are federally mandated protections for individuals on the basis of race, color, national origin, sex, sexual orientation, religion, and perceived or actual disability,⁴ relevant federal guidance and this document concentrate primarily on the areas of race and disability.

Federal agencies are particularly concerned about the disproportionate administration of discipline that leads to African American students, especially African American male students, facing harsher discipline in public schools than their peers. Data demonstrates that African American students are suspended and expelled at a rate three (3) times greater than white students, over fifty (50) percent of students who were involved in school-related arrests or referred to law enforcement are Hispanic or African American, and twenty (20) percent of all African American male students receive out-of-school suspensions.⁵ In 2014, the United States Department of Justice and USED issued guidance aimed at remedying discriminatory discipline practices occurring across the country, and encouraging new approaches in the area of school discipline.⁶ OSSE hopes to work with LEAs to rethink the administration of school discipline to address any racial disparities.

A. The Civil Rights Act of 1964

The Civil Rights Act of 1964⁷ (Civil Rights Act), is the landmark civil rights law prohibiting discrimination against protected groups in several areas, including education, housing, and employment. The relevant sections, called titles, of the Civil Rights Act relating to education are:

- Title IV which prohibits discrimination on the basis of race, color, sex, religion, or national origin in public elementary and secondary schools and higher education institutions.⁸
- Title VI which prohibits discrimination on the basis of race, color, and national origin by those receiving federal funds, including schools.⁹

Under the Civil Rights Act, schools may not intentionally discipline students differently based on race, color, or national origin. Intentional discrimination, also known as *disparate treatment*, in school discipline may occur when:

- A discipline policy contains explicit language requiring that students of one race be disciplined differently from students of another race;
- A discipline policy contains explicit language requiring that only students of a particular race be subject to disciplinary action;
- A school administers a discipline policy in a discriminatory manner;¹⁰

⁴ 42 U.S.C. § 2000d *et seq.*; Executive Order 13160; 20 U.S.C. § 1400 *et seq.*; 29 U.S.C. § 701 *et seq.*

⁵ US Department of Education Office of Civil Rights. (2014). Civil Rights Data Collection: Data Snapshot (School Discipline). Available at: <http://ocrdata.ed.gov> .)

⁶ US Department of Education (2014). School Climate and Discipline Guidance. Available at <http://www2.ed.gov/policy/gen/guid/school-discipline/index.html>.

⁷ Civil Rights Act of 1964, 42 U.S.C. §§ 2000 *et seq.*

⁸ 42 U.S.C. §§ 2000c *et seq.*

⁹ 42 U.S.C. §§ 2000d *et seq.* and its implementing regulations, 34 C.F.R. Part 100.

- A school permits the *ad hoc* discriminatory discipline of students in areas that the school discipline policy does not address;
- A school selectively enforces discipline policies against students of one race, color, or national origin;
- A school adopts a facially neutral policy with the intent to target students of a particular race, color, or national origin; or
- An individual teacher or administrator acts based on racially discriminatory motives while disciplining a student.¹¹

To determine whether a school intentionally discriminates in the administration of student discipline, schools should ask:

- Did the school limit or deny educational services, benefits, or opportunities to a student or group of students of a particular race by treating them differently from a similarly situated student or group of students of another race in the disciplinary process?
- Can the school articulate a legitimate, nondiscriminatory reason for the different treatment?
- If so, is the reason articulated a pretext for discrimination?¹²

Schools may not create policies or engage in practices that have a discriminatory *disparate impact* on students – meaning that the policy itself does not mention race and is administered in an evenhanded manner but has a disproportionate and unjustified effect on students of a particular race. To determine whether a discipline policy has an unlawful disparate impact on the basis of race, color, or national origin¹³ schools should review the policy and ask:

- Does the discipline policy result in an adverse impact on students of a particular race, color, or national origin as compared with students of other races, color, or national origin? Schools will need to disaggregate discipline data and review it at every level from low consequence disciplinary actions (demerits, points, lunch/recess detentions) to high consequence disciplinary actions (suspension, expulsion, or other forms of discipline resulting in exclusion from the regular school program).
- If there is a disparate impact, is the discipline policy necessary to meet an important educational goal?
- If the policy is necessary to meet an important educational goal, are there other comparably effective alternative policies or practices that would meet the school’s stated objective with less of a burden or negative impact on the disproportionately affected group? (Also consider: Is the justification for the policy a pretext for discrimination?)

¹⁰ A typical example is when similarly situated students of different races are disciplined differently for the same offense.

¹¹ US Departments of Education and US Department of Justice. (2014). Dear Colleague Letter: Nondiscriminatory Administration of School Discipline, at 6-8.

¹² US Departments of Education and US Department of Justice. (2014). Dear Colleague Letter: Nondiscriminatory Administration of School Discipline, 8-9.

¹³ The US Department of Education and the US Department of Justice employ this three-part inquiry when investigating disparate impact of discipline policies in schools. See US Departments of Education and US Department of Justice. (2014). Dear Colleague Letter: Nondiscriminatory Administration of School Discipline, 11-12.

B. Discipline of Students with Disabilities

Americans with Disabilities Act of 1990

Title II of the Americans with Disabilities Act of 1990¹⁴ (ADA) prohibits discrimination on the basis of disability in all services, programs, and activities administered by state and local government entities, including public schools. These protections are similar to those provided by Section 504 of the Rehabilitation Act of 1973 (discussed below), but extends to all activities regardless of the receipt of federal funding, which includes private schools not associated with religious organizations¹⁵. Under Title II, schools cannot refuse to allow a person with a disability to participate in a service, program, or activity because of the person's disability¹⁶. Schools must ensure persons with disabilities have equal access to enjoy services, programs, or activities, and must provide reasonable modifications in policies, practices, or procedures when necessary to avoid discrimination on the basis of disability, unless doing so would fundamentally alter the nature of the service, program, or activity¹⁷. The ADA and Section 504 employ the same definition of "individual with a disability", as detailed below.

Section 504 of the Rehabilitation Act of 1973

Section 504 of the Rehabilitation Act of 1973¹⁸ prohibits discrimination on the basis of disability by any program or activity that receives federal funding, including schools. The law requires preschool, elementary, and secondary schools to provide a free appropriate public education (FAPE) to each qualified student with a disability. Section 504 defines an individual with a disability as "a person who has a physical or mental impairment that substantially limits a major life activity".¹⁹ This definition also includes people who "have a record" of such an impairment or "are regarded as having" such an impairment. Therefore, it is important that LEAs are mindful that discrimination and discipline requirements apply to a large group of students, including those who have a record of impairment or are regarded as having an impairment under Section 504, and is not dependent on a student with a disability having an IEP or Section 504 services plan.

Generally, Section 504 and IDEA apply to the disciplinary removal of students with disabilities in a similar manner. Before implementing a disciplinary action that constitutes a change in placement for a student with a disability under Section 504, the LEA must conduct a manifestation determination and follow the same requirements for such proceedings as detailed in IDEA. However, if an LEA determines that the student's misconduct was not a manifestation of the student's disability, unlike IDEA, an LEA is not required to provide educational services during the period of removal for a student with a disability under Section 504.

The Individuals with Disabilities Education Act

The Individuals with Disabilities Education Act²⁰ (IDEA) is a federal assistance program designed to ensure services to children with disabilities and governs how special education and related services are provided to students. IDEA creates a number of procedural safeguards to protect children with

¹⁴ 42 U.S.C. §§ 12131 *et seq.*

¹⁵ 35 C.F.R. § 102.

¹⁶ 35 C.F.R. § 130.

¹⁷ 35 C.F.R. § 130(b)(7).

¹⁸ 29 U.S.C. § 794.

¹⁹ 34 C.F.R. § 104.3(j).

²⁰ 20 U.S.C. §1400 *et seq.* and its implementing regulations at 34 C.F.R. Part 300.

disabilities in cases of disciplinary removal. It does not prohibit discipline of children with disabilities, but rather contains requirements that must be met by the LEA in the case that a child with a disability – or a child who is suspected of having a disability – violates a student code of conduct and is removed from his or her current education setting.

A child with a disability who violates a code of student conduct may be removed from his or her current placement, to an appropriate interim alternative educational setting, another setting, or suspension, for not more than ten (10) consecutive school days.²¹

- These disciplinary procedures must be the same as those applied to children without disabilities.²²
- A child with a disability may be subject to additional removals of not more than ten (10) consecutive school days in that same school year for separate incidents of misconduct as long as those removals do not constitute a change of placement.²³
- After a child with a disability has been removed from his or her current placement for ten (10) school days in the same school year, during any subsequent days of removal the LEA must provide the student with services as prescribed by IDEA.²⁴

If a child with a disability is removed from his or her current placement for more than ten (10) school days (either consecutively or totaling ten (10) days because of a pattern of behavior), the LEA must conduct a meeting to determine if the behavior that gave rise to the violation of the school code is a manifestation of the child's disability.²⁵

- The manifestation determination meeting must include the LEA, parent, and relevant members of the child's IEP Team.²⁶
- The meeting must involve a review of all relevant information in the child's file to determine if the child's conduct in question was caused by, or had a direct and substantial relationship to, the child's disability, or if the conduct was the result of the LEA's failure to implement the student's IEP.²⁷
- If the child's behavior is determined not to be a manifestation of the child's disability the relevant disciplinary procedures that would apply to children without disabilities can be applied.²⁸

If the determination is made that the conduct was a manifestation of the child's disability, the IEP Team must conduct a functional behavioral assessment and implement a behavioral intervention plan for the child or modify the child's existing behavioral intervention plan to address the problematic behavior.²⁹

²¹ 34 C.F.R. § 300.530(b).

²² 34 C.F.R. § 300.530(b)(1).

²³ 34 C.F.R. § 300.530(b)(1). A change of placement occurs if the child is removed from the current educational placement for more than ten (10) consecutive school days or the child is subject to a series of removals that total more than 10 school days during the same school year as a result of a pattern of behavior. See 34 C.F.R. § 300.536.

²⁴ 34 C.F.R. § 300.530(b)(2) and (d).

²⁵ 34 C.F.R. § 300.530(e).

²⁶ 34 C.F.R. § 300.530(e)(1).

²⁷ 34 C.F.R. § 300.530(e)(1).

²⁸ 34 C.F.R. § 300.530(c).

²⁹ 34 C.F.R. § 300.530(f).

The child must be allowed to return to the placement from which the child was removed, unless the parent and the LEA agree to a change of placement.³⁰

However, a child with a disability may be removed to an interim alternative educational setting for up to forty-five (45) school days without regard for whether the behavior is determined to be a manifestation of the child's disability, if the child does any of the following:

- Carries a weapon to or possesses a weapon at school, on school premises, or to or at a school function under the jurisdiction of an SEA or an LEA.³¹
- Knowingly possesses or uses illegal drugs, or sells or solicits the sale of a controlled substance, while at school, on school premises, or at a school function under the jurisdiction of an SEA or an LEA.³²
- Has inflicted serious bodily injury upon another person while at school, on school premises, or at a school function under the jurisdiction of an SEA or an LEA.³³

The discipline rules under IDEA can also apply to a student who is suspected of having a disability, but who has not yet been determined eligible for special education. If a student engages in behavior that violates a code of student conduct and the LEA had knowledge that the student may be a child with a disability before the behavior that precipitated the disciplinary action occurred, the student is protected by IDEA.³⁴ An LEA is considered to have knowledge that a student may be a child with a disability if any of the following took place prior to the student engaging in the behavior that resulted in disciplinary action:

- The parent of the student expressed concern in writing to the LEA or the student's teacher that the student is in need of special education and related services.³⁵
- The parent of the student requested that the student be evaluated to determine if the student was eligible for special education and related services.³⁶

The student's teacher or other LEA personnel expressed specific concerns about a pattern of behavior demonstrated by the child directly to the LEA's director of special education or other supervisory personnel.³⁷

C. The Family Educational Rights and Privacy Act

The Family Educational Rights and Privacy Act³⁸ (FERPA) generally prohibits the improper disclosure of personally identifiable information derived from education records. In the case of students who have been subject to disciplinary action, discipline records are considered education records protected by FERPA. As such, discipline records may generally not be disclosed to a third party unless the student's parent has provided written consent.

³⁰ 34 C.F.R. § 300.530(f)(2).

³¹ 34 C.F.R. § 300.530(g)(1).

³² 34 C.F.R. § 300.530(g)(2).

³³ 34 C.F.R. § 300.530(g)(3).

³⁴ 34 C.F.R. § 300.534(a).

³⁵ 34 C.F.R. § 300.534(b)(1).

³⁶ 34 C.F.R. § 300.534(b)(2).

³⁷ 34 C.F.R. § 300.534(b)(3).

³⁸ 20 U.S.C. § 1232g and its implementing regulations, 34 C.F.R. Part 99.

D. The Every Student Succeeds Act

The Every Student Succeeds Act³⁹ (ESSA) requires SEAs and LEAs to develop plans that address ways of supporting efforts to reduce the overuse of disciplinary practices that remove students from the classroom.⁴⁰ ESSA emphasizes that a description of these efforts may include identifying and supporting specific schools with high rates of discipline, disaggregated by each of the subgroups of students.⁴¹

³⁹ Approved December 10, 2015 (114 P.L. 95; 129 Stat. 1802).

⁴⁰ S. 1177 Sec. 1112 (b)(11).

⁴¹ S. 1177 Sec. 1112 (b)(11).

III. OVERVIEW OF LOCAL LAWS THAT AFFECT SCHOOL DISCIPLINE

This section highlights select District of Columbia laws that affect a variety of issues related to student discipline, including discrimination, prohibitions on suspension and expulsion of pre-Kindergarten students, bullying, and reporting requirements. Although local regulations on student discipline apply only to DCPS, the laws discussed in this section apply to all schools in the District of Columbia.

A. The District of Columbia Human Rights Act

The District of Columbia Human Rights Act of 1977⁴² (DCHRA) prohibits discrimination against people that live, visit, or work in the District of Columbia based on nineteen (19) protected traits. The DCHRA bans discrimination in housing, employment, public accommodations, and educational institutions.

Protected traits for schools⁴³ include:

- Race
- National origin
- Marital status
- Gender identity or expression
- Disability
- Color
- Religion
- Family responsibilities
- Sexual orientation
- Familial status
- Sex
- Age
- Personal appearance
- Political affiliation
- Source of income

Schools must ensure that discipline policies and practices do not result in discrimination against students based on any of the above traits, whether the traits are actual or perceived.

B. Prohibition on Pre-K Suspensions and Expulsions

The Pre-K Student Discipline Amendment Act of 2015⁴⁴ prohibits the expulsion of a student of pre-Kindergarten (pre-K) age from any publicly funded community-based organization, DCPS school, or public charter school that provides pre-K care and education services to pre-K age children.⁴⁵ The law also prohibits out-of-school suspension of a pre-K student unless a school administrator determines that the student has willfully caused or attempted to cause bodily injury, or threatened serious bodily injury⁴⁶ to another person, excluding self-defense.⁴⁷ Suspensions must not exceed three (3) days for any individual incident.⁴⁸ "Out-of-school suspension" means the removal of a student from school attendance for an entire school day or longer.⁴⁹

C. Youth Bullying Prevention Act of 2012

In establishing and maintaining a school climate that promotes an overall high quality of school life, it is important that the impact of bullying be examined. To avoid the negative effects of bullying on children's academic achievement, learning, and development, schools can implement programs to

⁴² Effective December 13, 1977 (D.C. Law 2-38; D.C. Code §2-1401.01 *et seq.*).

⁴³ D.C. Code § 2-1402.41 *et seq.*

⁴⁴ Effective June 23, 2015 (D.C. Law 21-12; D.C. Code § 38-271.01 *et seq.*).

⁴⁵ D.C. Code § 38-273.03(a).

⁴⁶ "Serious bodily injury" means bodily injury that involves a substantial risk of death, unconsciousness, extreme physical pain, protracted and obvious disfigurement, or protracted loss or impairment of the function of a bodily member, organ, or mental faculty. DC Code § 38-271.01(11A).

⁴⁷ D.C. Code § 38-273.03(b).

⁴⁸ D.C. Code § 38-273.03(b).

⁴⁹ D.C. Code § 38-271.01(5A).

address and modify problematic student behaviors. The Youth Bullying Prevention Act of 2012⁵⁰ requires all District of Columbia agencies, grantees, and educational institutions that provide services to youth to adopt a bullying prevention policy. Each LEA is required to establish a bullying prevention policy that includes an expected code of conduct and the consequences that may result from engaging in bullying, including disciplinary actions.⁵¹

D. Annual Reporting Requirements

The Pre-K Student Discipline Amendment Act of 2015 amended the Attendance Accountability Amendment Act of 2013 to require LEAs to maintain discipline data for each enrolled student and report such data to OSSE on an annual basis⁵². The following discipline data must be maintained for each student:

- Total number of out-of-school suspensions and in-school suspensions experienced by the student during each school year;
- Total number of days excluded from school;
- Whether the student was referred to an alternative education setting for the duration of a suspension;
- Whether the student was expelled during the school year;
- Whether the student voluntarily or involuntarily transferred or withdrew from the school during the school year; and
- For each suspension or expulsion, a description of the action that led to the suspension or expulsion.⁵³

Beginning in 2016, LEAs must also provide discipline data to OSSE by August 15 annually, and OSSE must share this information with the public by October 1 of each year. This data report must be disaggregated by demographic characteristics⁵⁴ and include:

- The students suspended for at least one (1) and no more than five (5) days;
- The students suspended for at least six (6) and no more than ten (10) days;
- The students suspended for more than ten (10) days total;
- The students who received more than one suspension in a school year;
- The students who were referred to an alternative educational setting for the course of a suspension;
- A description of the types of actions that led to the suspension or expulsion;
- The students expelled; and
- The students who voluntarily or involuntarily transferred or withdrew from the school during the school year.⁵⁵

⁵⁰ D.C. Code § 2-1535.01 *et seq.*

⁵¹ For further information on the required components of a bullying policy and for other resources, visit the District-wide Model Bullying Prevention Policy provided by the Citywide Youth Bullying Prevention Program within the District of Columbia Office of Human Rights. Available at: <http://ohr.dc.gov/page/bullyingprevention>.

⁵² D.C. Code § 38-236(a)(2).

⁵³ D.C. Code § 38-236(a)(2).

⁵⁴ Data must be disaggregated by the following characteristics: campus attended by the student, grade level, gender identification, race, ethnicity, special education status, English language learner status, and status as an at-risk youth as defined by D.C. Code § 38-2901(2A). See D.C. Code § 38-236(a)(1) and (b).

⁵⁵ D.C. Code § 38-236(b).

E. Title 5-B, Chapter 25 Regulations

Although the regulations found in Title 5-B , Chapter 25 of the DCMR apply only to DCPS, they provide a useful framework for public charter school LEAs as discipline policies are created or updated. These discipline regulations contain components that help to ensure fair and equitable standards are applied consistently in student discipline decisions, and that all parties can work to safeguard students’ rights. The regulations include the following requirements:

- **Distribution of discipline rules and policies to students and parents:** A copy of the DCPS policies and rules regarding student discipline must be distributed or made available to students and parents within thirty (30) days after the start of each school year, or upon the student’s initial enrollment, whichever occurs later.⁵⁶
- **Distribution of discipline rules and policies to staff:** A copy of the DCPS policies and rules regarding student discipline must be distributed or made available to school staff within thirty (30) days after the start of each school year, or upon initial employment, whichever occurs later.⁵⁷
- **Use of prevention, intervention, and remediation strategies:** Whenever possible, prevention, intervention, and remediation strategies must be used in addition to disciplinary responses. The regulations provide a list of specific actions to be used as methods for prevention, intervention, and remediation.⁵⁸
- **Progression of disciplinary responses:** Disciplinary responses stated to be aimed at enabling students to continue their instructional program, and staff is required to implement disciplinary responses in a progression, beginning with the least severe appropriate response. The regulations include a list of the range of permissible disciplinary responses, from least to most severe.⁵⁹
- **Notice to students of infractions and responses:** DCPS is required to provide students with adequate and timely notification of student infractions and disciplinary responses.⁶⁰
- **Clearly established grounds for disciplinary action:** The regulations contain a list of specific behaviors and the permissible disciplinary responses that may be taken.⁶¹
- **Detailed suspension and expulsion procedures:** On-site and Off-site suspensions and expulsions are required to adhere to a range of requirements and prohibitions.⁶²
- **Appeal and hearing rights and procedures:** The student is required to be notified of the appeal rights, and the regulations establish the procedures that govern the hearing process.⁶³
- **Procedures for discipline of students with disabilities:**⁶⁴The regulations describe the procedures required in order to protect the rights of students with disabilities.

⁵⁶ 5-B DCMR § 2500.15.

⁵⁷ 5-B DCMR §2500.16.

⁵⁸ 5-B DCMR §2500.4–6.

⁵⁹ 5-B DCMR §2500.10–12.

⁶⁰ 5-B DCMR §2500.14.

⁶¹ 5-B DCMR §2502.

⁶² 5-B DCMR §2504.

⁶³ 5-B DCMR §2505; 5-B DCMR §2506.

⁶⁴ 5-B DCMR §2510.

IV. KEY FRAMEWORKS FOR UNDERSTANDING AND ADDRESSING BEHAVIOR

As LEAs work toward developing age-appropriate systems of behavior support, it is important to consider key theoretical frameworks that can inform effective planning and intervention.

A. Trauma Theory

A large body of research now exists that demonstrates the impact of chronic stress and the experience of traumatic events on children’s ability to learn. Research shows that trauma, defined as an extremely distressing experience that causes severe emotional shock and may have long-lasting psychological and physiological effects, impact more than two thirds of children in the country by the age of 16.⁶⁵

Experts have defined a traumatic response as a “fight or flight” response that, while necessary for survival in the moment of the event, can become permanent. Individuals who have experienced trauma can remain in a state of physiological arousal in which they are easily startled or irritated; anxious, sad, or angry; disconnected from their surroundings; and/or verbally compromised. In addition, research shows that chronic stress negatively impacts memory.⁶⁶

Given the amount of traumatic experiences that may be present in children’s lives, it is important for educators to understand the impact of trauma and recognize it as a potential root cause for misbehavior or poor academic performance, before assuming that a child’s misbehavior is intentional or controllable. Approaching misbehavior through the lens of trauma leads adults to first consider “What happened to this child?” rather than “What is wrong with this child?”

B. Functionally Based Behavior Support

A second important lens through which to examine behavior is that of examining the function the behavior serves. Functional behavior support assumes that a child’s behavior is a child’s attempt to adapt to a specific situation. Functions of behavior can be roughly divided into two purposes: to get something or to avoid something. It is important to note that the form of behavior (how a student acts) is not necessarily related to its function. Function can only be determined by examining the student’s interactions within the environment, which includes the responses, or consequences, the child experiences as a result of the behavior.

Functionally-based behavior support, also referred to as Positive Behavior Support (PBS), is premised upon the concept that intervention is only effective when it is based upon a thorough understanding of the problem behavior and the underlying function it is serving for the child. If school teams are utilizing an intervention and not seeing improvement, it is likely because they have either not correctly identified the underlying function of the behavior, or the consequence being utilized is not an appropriate consequence, unintentionally reinforcing the behavior rather than eliminating it. Utilizing a robust functional behavior assessment (FBA) process to examine the functions of behaviors is critical to developing effective interventions.

⁶⁵ Felitti, Vincent J. et al. (1998) *Relationship of Childhood Abuse and Household Dysfunction to Many of the Leading Causes of Death in Adults*. American Journal of Preventive Medicine 14(4):245 – 258.

⁶⁶ Perry, Bruce D., and Pollard, Ronnie. (1998) Homeostasis, stress, trauma, and adaptation: A neurodevelopmental view of childhood trauma. *Child and Adolescent Psychiatric Clinics of North America* 7(1): 33-51.; Bloom, S. L. (2014) The impact of trauma on development and well-being. In K. G. Ginsburg & S. B. Kinsman (Eds). *Reaching Teens - Wisdom From Adolescent Medicine*. Elk Grove Village, IL: American Academy of Pediatrics.

C. Resiliency Theory

A significant body of research exists that has examined why certain individuals with known risk factors due to traumatic events are able to “beat the odds”, excelling socially and academically in childhood and as adults. Leading experts have found that there are certain mitigating factors, also referred to as developmental assets,⁶⁷ which essentially “inoculate” these individuals against the damage of traumatic stress, making them resilient.

While many factors have been correlated with increased resiliency, one factor stands out- the presence of one caring, consistent adult in the child’s lives.⁶⁸ This finding has important implications for schools. While there is much that educators cannot control in children’s lives outside of schools, creating structures within schools that ensure that each child is linked to an adult mentor is something that can be life changing for our students.

⁶⁷ Search Institute. “Developmental Assets”, available at <http://www.search-institute.org/research/developmental-assets>

⁶⁸ Henderson, N. (2007) Resiliency In Action: Practical Ideas for Overcoming Risks and Building Strengths in Youth, Families, and Communities. Ojai, CA: Resiliency in Action.

V. RECOMMENDED PRACTICES FOR SCHOOL DISCIPLINE

This section provides recommendations intended to help schools adopt comprehensive, appropriate and effective school discipline policies and practices that (i) reduce disruption and misconduct; (ii) support and reinforce positive behavior and character development; and (iii) help students become college and career ready. These recommendations are intended to be instructive and are not exhaustive.

A. Recommended Components of an LEA Discipline Policy

OSSE recommends that LEAs develop school discipline policies and procedures that take into consideration age-appropriate behavior and research-based strategies for effective behavior management based on the particular needs of the school and its student population. OSSE also recommends that school discipline policies are made readily available to parents and the school community, and schools regularly engage in a review of data to inform necessary revisions.

Specifically, LEAs are encouraged to include the following components in a school discipline policy:

- **School-wide behavior management system:** An effective school-wide approach to discipline encourages clear and consistent expectations of appropriate behavior and serves to both prevent misbehavior and intervene timely and effectively, reducing escalation. LEAs are encouraged to train staff in the model and given the resources and time necessary for reviewing data, teaching students expected behaviors across environments, and enforcing discipline procedures promptly, consistently, and equitably in a way that corrects misbehavior.
- **Student code of conduct:** An LEA should establish foundational expectations for student conduct and identify specific impermissible behaviors. Encourage students to embrace the student code of conduct by creating school-wide dialogues regarding student perspectives on appropriate behavior and school climate.
- **Defined disciplinary responses:** Rewards and consequences for behavior should be multi-tiered, proportional, and logically connected to the behavior they are intended to either eliminate or support. In addition, an LEA should clearly describe all possible disciplinary actions and the grounds for each, including in-school disciplinary interventions and out-of-school suspensions and expulsions.
- **Notice to parents:** An LEA should establish procedures for notifying parents of behavior incidents and disciplinary actions and provide information on points of contact and discipline resources for parents to access.
- **Crisis intervention procedures.** A discipline policy should describe how an LEA will respond to and de-escalate disruptive or assaultive behavior. Staff should be trained on proper implementation of crisis intervention responses and behavior management techniques.
- **Seclusion and restraint policy.** LEAs should establish procedures for employing seclusion and restraint only in the event of an emergency, defined as an incident in which there is immediate risk of harm. The school discipline policy should include the definition of a behavioral emergency, information on the model in which the staff is trained to intervene, the limited circumstances in which seclusion or restraint may be used, monitoring of students during periods of seclusion or restraint, and procedures for incident reporting, parental notification, a student intervention planning after the incident.
- **Ban on corporal punishment:** As corporal punishment is considered an ineffective and unnecessary behavior management technique, OSSE recommends that LEA discipline policies should adopt a policy explicitly prohibiting the use of physical force on a student as a means of punishment or discipline.

- **Bullying prevention policy:** Identifying and addressing bullying behaviors is a vital component of creating a positive, safe learning environment and required by the Youth Bullying Prevention Act of 2012.⁶⁹
- **Search of students and property:** LEAs must strike an appropriate balance between student right to privacy and ensuring a safe school environment. School discipline policies should include information on the reasonable search of students and student property, consistent with students' Fourth Amendment rights against unreasonable searches and seizures and the requirement for reasonable suspicion established by the Supreme Court in *New Jersey v. T.L.O* (469 U.S. 325 (1985)).
- **Referral to law enforcement:** Describe how it will involve or consult law enforcement in the event that it suspects criminal activity.
- **Weapons policy:** Include a description of what constitutes a weapon⁷⁰, a statement banning weapons on school property and at school events, and the consequences of possessing a weapon In accordance with the Gun Free Schools Act⁷¹ and D.C. Code § 38-231 *et seq.*, a student who is determined to have brought a weapon to school is subject to expulsion for a period of not less than one (1) year. An LEA may modify the expulsion requirement on a case-by-case basis if the modification is in writing.⁷² LEAs must report weapons expulsions to OSSE on an annual basis including the name of the school concerned, the number of students expelled, and the types of weapons involved. Additionally, LEAs are required to refer to law enforcement any student who brings a gun to school
- **Appeals process for discipline actions:** Consistent with the concepts of fairness and due process, LEAs should provide for internal appeal and review of disciplinary actions. Such appeals must also be consistent with the requirements of IDEA and Section 504 as discussed above.
- **Data collection and management:** LEAs should establish procedures and systems for collecting, reviewing, and analyzing data on student behavior and discipline actions on a regular basis to identify trends and refine approaches. A school discipline policy or school data policy should include information on the types of information that will be collected and detail how personally identifiable information is protected.
- **Solicit feedback from the school community:** Conduct an annual school climate survey to gather feedback from students, parents, school staff, and other stakeholders. Include questions related to disciplinary policies, student support and engagement, teacher support, prevalence of bullying and harassment, and other indicators of school climate.

C. Guiding Principles from USED⁷³

To help states, LEAs, and schools in addressing student discipline from a positive perspective, USED released guidance identifying three key principles of developing positive school climates and effective discipline policies. The guiding principles center around: climate and prevention; clear, appropriate, and consistent expectations and consequences; and fairness, equity, and continuous improvement.

⁶⁹ Each LEA is required to establish a bullying prevention policy pursuant to the Youth Bullying Prevention Act of 2012.

⁷⁰ D.C. Code § 38-234.

⁷¹ 20 U.S.C. § 7961.

⁷² 20 U.S.C. § 7961(b)(1).

⁷³ US Department of Education. *Guiding Principles: A Resource Guide for Improving School Climate and Discipline*. January 8, 2014. Available at <http://www2.ed.gov/policy/gen/guid/school-discipline/guiding-principles.pdf>.

Guiding Principle 1: Climate and Prevention

Schools that foster positive school climates can help to engage all students in learning by preventing student misbehavior and intervening effectively to support struggling and at-risk students.

Action Steps for Guiding Principle 1

- Engage in deliberate efforts to create positive school climates.
- Prioritize the use of evidence-based prevention strategies, such as tiered supports, to promote positive student behavior.
- Promote social and emotional learning to complement academic skills and encourage positive behavior.
- Provide regular training and supports to all school personnel – including teachers, principals, support staff, and school-based law enforcement officers – on how to engage students and support positive behavior.
- Collaborate with local mental health, child welfare, law enforcement, and juvenile justice agencies and other stakeholders to align resources, prevention strategies, and intervention services.
- Ensure that any school-based law enforcement officers' roles focus on improving school safety and reducing inappropriate referrals to law enforcement

Guiding Principle 2: Clear, Appropriate, and Consistent Expectations and Consequences

Schools that have discipline policies or codes of conduct with clear, appropriate, and consistently applied expectations and consequences will help students improve behavior, increase engagement, and boost achievement.

Action Steps for Guiding Principle 2

- Set high expectations for behavior and adopt an instructional approach to school discipline.
- Involve families, students, and school personnel in the development and implementation of discipline policies or codes of conduct, and communicate those policies regularly and clearly.
- Ensure that clear, developmentally appropriate, and proportional consequences apply for misbehavior.
- Create policies that include appropriate procedures for students with disabilities and due process for all students.
- Remove students from the classroom only as a last resort, ensure that any alternative settings provide students with academic instruction, and return students to their regular class as soon as possible.

Guiding Principle 3: Equity and Continuous Improvement

Schools that build staff capacity and proactively and continuously evaluate the school's discipline policies and practices are more likely to ensure fairness and equity, and promote achievement for all students.

Action Steps for Guiding Principle 3

- Train all school staff to apply school discipline policies, practices, and procedures in a fair and equitable manner that does not disproportionately impact students of color, students with disabilities, or other students at risk for dropout, trauma, or social exclusion.

- Use proactive, data-driven, and continuous efforts, including gathering feedback from families, students, teachers, and school personnel in order to prevent, identify, reduce, and eliminate discriminatory discipline and unintended consequences.

D. Examples of Promising Practices

In the District and across the nation, educators have become increasingly aware of the connection between school climate and academic outcomes. States and local jurisdictions have been working hard to proactively address challenges within the school and classroom and create effective systems of behavior support to ensure that all students feel welcome and fully engaged in the learning environment.

This section highlights some promising practices both in the District and in various jurisdictions across the country.

The District of Columbia: Implementing a Whole-School Restorative Practices Model

What is a Whole-School Restorative Model?

A whole-school restorative model is fundamentally about aligning the culture of a school along values of trust, compassion, inclusivity, and accountability. It is reflected in formal interventions and policies, casual conversations and interactions, as well as the internal mindset and sense of community of all its members from students and teachers to support staff and parents.

A whole-school model uses **proactive practices** such as classroom and staff circles for building community and a culture of care alongside **responsive practices** such as restorative circles or conferences for responding to harm in a way that meaningfully addresses the needs of all who have been affected. These practices

- Foster key social emotional life skills such as listening and empathy
- Maximize student involvement in developing norms and resolving problems
- Encourage civic involvement and taking responsibility through personal reflection
- Reintegrate the harm doer into the community as a valuable, contributing member instead of pushing them out
- Recognize everyone's inherent worth and voice, while holding them accountable for harm
- Lend themselves to constant evaluation and improvement

What Outcomes Can Schools Expect from Restorative Practices?

Schools that have implemented restorative practices from all or parts of the continuum have seen reductions in the number of incidents of disruptive behavior and in the number of suspensions. Some schools have found racial inequities in suspensions disappear and observed a greater sense of safety in the school, supported positive relationships between students and adults, and improved academic performance.

What is the Need for Restorative Practices?

The US Departments of Education and Justice have conclusively rejected zero tolerance exclusionary discipline policies, which constitute one of the key drivers of the school-to-prison pipeline. Currently violence, truancy, suspensions, and trauma seriously affect our schools and have a disproportionate impact on our most vulnerable students. Instead, major school districts around the country, including Oakland, Chicago, Denver, Los Angeles, San Francisco, and neighboring Prince George's and Fairfax counties, have adopted evidence-based restorative practices and invested millions as part of a long-term paradigm shift in education.

What is Happening in the District?

In DC, the Office of State Superintendent for Education (OSSE) has worked with DC Public Schools (DCPS), DC public charter schools, and SchoolTalk, Inc. to develop the “Restorative DC” initiative. Additional key stakeholders include the District’s Office of Human Rights Bullying Prevention Program, City Council, and DC Superior Court.

What is Restorative DC?

Restorative DC is a community-based initiative that aims to support DC schools and agencies in integrating the restorative justice philosophy and practice. The team comprises practitioners. Reflecting the spirit of restorative justice, the following principles guide the work:

- The centrality of relationships and partnerships;
- The need for accountability and understanding for all involved;
- The empowerment of youth;
- The promotion of local, equitable leadership in the project;
- The need to embrace change and growth; and
- The commitment to work through challenges collaboratively.



Outputs and Outcomes for the 2015-16 School Year

Pilot Schools: During SY15-16, Restorative DC partnered with DC Public Schools (DCPS) Central Office and the Office of State Superintendent for Education (OSSE) to work with four DCPS schools: Ballou Senior High School, Columbia Heights Education Campus, Hart Middle School, and Luke C. Moore High School, and one public charter school, Maya Angelou. The four pilot DCPS schools have **reduced their suspensions by an average of 50%**. They have seen a shift in school culture marked by a greater sense of safety, belonging, and community. Since the beginning of the school year the Restorative DC team has provided schools with over 1,000 hours of on-site technical assistance and 140 hours of professional development.

District-wide Activities: There is significant demonstrated interest across the wider DC school community in implementing restorative practices. OSSE has sponsored monthly Community of Practice meetings and a monthly training series alternating with introduction and advanced content. Both have been at capacity, with over 20 schools in regular attendance, along with DCPS/OSSE central office staff. Furthermore, Restorative DC has partnered with the Office of Attorney General (OAG), coordinating and training facilitators to offer schools and the juvenile justice system with Restorative Justice Conferencing as an alternative to arrest, prosecution, suspension, or expulsion. Finally, Restorative DC has partnered with the DC Special Education Cooperative and Eastern Mennonite University to explore the intersections of restorative practices and special education.

Testimonials from Ballou HS

“We now have a tool that we can actually use in the school and classroom that is making a difference with suspensions in a way we have never experienced.”

~ Behavioral Technician

“After many years of family problems, fighting, arguing, and mental health challenges with my sister, I decided to take the talking piece home and now we use the circle to communicate and work things out.”

~ Student

“The generation of today just wants to be heard. I use this with the football team. The football is the talking piece. They now have a clear understanding of the method to the madness.”

~ Coach

Connecticut’s School Climate “Call to Action”

In 2000, Connecticut’s Commissioner of Education issued a call to action to all adults in the education system regarding the importance of supporting a positive school climate. Currently, Connecticut actively monitors school climate through using a series of tools and trainings.

To learn more, see: <http://www.sde.ct.gov/sde/cwp/view.asp?a=2618&q=321794>

Illinois’ PBIS Network

Illinois has implemented a Positive Behavior Interventions and Supports (PBIS) systems approach to establishing the behavioral supports and social culture and needed for all students in a school to achieve social, emotional, and academic success. PBIS applies a three-tiered system and a problem-solving process to enhance the capacity of schools to effectively educate all students.

To learn more, see: <http://www.istac.net/resources/illinois-pbis-network-resources>

Oregon’s PBIS

Use of PBIS strategies throughout the state of Oregon is intended to help districts and schools use to develop skills and knowledge to build systemic, accurate, and sustainable behavior support for all students.

To learn more, see: <https://www.pbis.org/pbis-network/oregon>

Kansas’s MTSS

Kansas utilizes a Multi-Tiered System of Support (MTSS), a continuum of evidence based, system-wide practices to support a rapid response to students’ academic and behavioral needs, with frequent data-based monitoring for instructional decision-making. MTSS has developed from and expanded upon the Response to Intervention Model (RtI).

To learn more, see: <http://www.kansasmtss.org/resources.html>

Los Angeles Unified School District’s (LAUSD) Discipline Foundation Policy

LAUSD made a commitment to providing safe classrooms and healthy environments for all learners through adopting School-Wide Positive Behavior Intervention Support (SWPBIS) via a Discipline Foundation Policy published in 2014.

To learn more, see: <http://achieve.lausd.net/Page/1512>

Do you have a model policy or best practice you would like to share? Contact OSSE.DSEPolicy@dc.gov to discuss posting your information on the LearnDC website.

VI. DEFINITIONS

Unless otherwise defined in local law, OSSE uses the following USED's definitions when collecting and reporting on discipline data:

Illicit Drug Related Incident

Drug-related incidents are incidents involving possession or use of substances that include tobacco or illicit drugs (including steroids, all prescription drugs for which the student does not have a prescription and inappropriate use of nonprescription drugs and other substances). Drug-related incidents will include the following:

- Possession or use of marijuana, hashish, or other cannabinoids on school grounds.
- Other illicit drugs possession or use on school grounds.
- Being under the influence of marijuana or illicit drugs on school grounds.
- Tobacco possession or use on school grounds.
- Inappropriate use of medication on school grounds.
- Trafficking or possession for sale of marijuana or other illicit drugs on school grounds.

Alcohol Related Incident

Alcohol-related incidents are incidents where students:

- Possessed or used alcohol on school grounds.
- Were under the influence of alcohol on school grounds.

Weapons Possession

Weapons possession is the possession of one of the following items:

- Handgun.
- Shotgun or rifle.
- Other type of firearm (e.g., devices designed to expel a projectile, grenade, explosive).
- Knife.
- Other sharp object (e.g., razor blade, ice pick, Chinese star).
- Other object (chain, brass knuckle, billy club, stun gun).
- Substance used as a weapon (mace, tear gas).

Violent Incident

Violent incidents may include, but are not limited to, the following:

- **Battery (physical attack or harm):** Examples include striking that causes bleeding, broken nose, and kicking a student while he or she is down. Consider age and developmentally appropriate behavior before using this category. This category should be used when the attack is serious enough to warrant calling the police or security or when serious bodily harm occurs. Include an attack with a weapon in this category. (This offense may be referred to by law enforcement as aggravated assault.)
- **Fighting (mutual altercation):** Mutual participation in an incident involving physical violence where there is no major injury.

- **Harassment, nonsexual (physical, verbal, or psychological):** Repeatedly annoying or attacking a student or group of students or other personnel that creates an intimidating or hostile educational or work environment.
- **Harassment, sexual (unwelcome sexual conduct):** Unwelcome sexual advances, requests for sexual favors, other physical or verbal conduct, or communication of a sexual nature, including gender-based harassment that creates an intimidating, hostile, or offensive educational or work environment.
- **Homicide (murder or manslaughter):** Killing a human being.
- **Physical altercation, minor (pushing, shoving):** Confrontation, tussle, or physical aggression that does not result in injury.
- **Robbery (taking of things by force):** The taking of, or attempting to take, anything of value that is owned by another person or organization under confrontational circumstances by force or threat of force or violence and/or by putting the victim in fear. A key difference between robbery and theft is that the threat of physical harm or actual physical harm is involved in a robbery.
- **School threat (threat of destruction or harm):** Any threat (verbal, written, or electronic) by a person to bomb or use other substances or devices for the purpose of exploding, burning, or causing damage to a school building or school property, or to harm students or staff.
- **Sexual battery (sexual assault):** Oral, anal, or vaginal penetration forcibly or against the person's will or where the victim is incapable of giving consent. Includes rape, fondling, indecent liberties, child molestation, and sodomy.
- **Threat/intimidation (causing fear of harm):** Physical, verbal, written, or electronic action which immediately creates fear of harm, without displaying a weapon and without subjecting the victim to actual physical attack. (This category only includes verbal incidents that cause fear. It does not include insubordination, lack of respect, defiance of authority, etc.).

Physical Injury

Incidents with injury include those in which one or more students, school personnel, or other persons on school grounds require professional medical attention. Examples include stab or bullet wounds, concussions, fractured or broken bones, or cuts requiring stitches.

Other

Other reasons for disciplining a student related to drug or alcohol use, weapons possession, or violence.

Removal by a hearing officer

Those instances in which an impartial hearing officer orders the removal of children with disabilities from their current educational placement to an appropriate alternative educational setting for not more than 45 school days based on the hearing officer's determination that maintaining the child's current

placement is substantially likely to result in injury to the child or others. The IEP team is responsible for determining the interim alternative educational setting.

Unilateral removals

Those instances in which school personnel (not the IEP team) order the removal of the children with disabilities from their current educational placement to an appropriate interim alternative education setting for no more than 45 school days. The IEP team is responsible for determining the interim alternative education setting. Unilateral removals do not include decision by the child's IEP team to change a student's placement.

VII. USEFUL RESOURCES

A. District of Columbia Resources

District of Columbia Municipal Regulations, Title 5-B, Chapter 25, available at <http://dcregs.dc.gov/Gateway/ChapterHome.aspx?ChapterNumber=5-B25>.

OSSE Annual Discipline Report, available at <http://osse.dc.gov/publication/discipline-report>.

OSSE Effective Behavior Support Webinar Series, available at <http://osse.dc.gov/service/effective-behavior-support-webinar-series>.

OSSE Least Restrictive Environment Toolkit, available at <http://osse.dc.gov/publication/least-restrictive-environment-toolkit>.

OSSE Positive Behavior Support Toolkit, available at <http://osse.dc.gov/publication/positive-behavior-support-pbs-toolkit>.

Office of the State Superintendent of Education, *Reducing Out-of-School Suspensions and Expulsions in District of Columbia Public and Public Charter Schools*, available at http://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/OSSE_REPORT_DISCIPLINARY_G_PAGES.pdf.

OSSE Section 504 Toolkit, available at <http://osse.dc.gov/service/section-504-rehabilitation-act>.

B. US Department of Education Resources

U.S. Department of Education, Restraint and Seclusion: Resource Document, available at <http://www2.ed.gov/policy/seclusion/restraints-and-seclusion-resources.pdf>.

U.S. Department of Education, Rethink Discipline: Resource Guide for Superintendent Action, available at <https://www2.ed.gov/policy/gen/guid/school-discipline/rethink-discipline-resource-guide-supt-action.pdf>.

U.S. Department of Education, School Climate and Discipline Guidance, available at www.ed.gov/school-discipline.

U.S. Department of Education and U.S. Department of Justice. (2014). Dear Colleague Letter: Nondiscriminatory Administration of School Discipline, available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-201401-title-vi.pdf>.

U.S. Department of Education Office for Civil Rights, Civil Rights Data Collection Web Page, available at www.ocrdata.ed.gov.

U.S. Department of Education Office of Special Education Programs, Evidence-Based Practices Classroom Strategies for Teachers, available at <https://www.osepideasthatwork.org/evidencebasedclassroomstrategies/>.

U.S. Department of Education Office of Special Education Programs, National Technical Assistance Center on Positive Behavioral Interventions and Supports <http://www.pbis.org>.

C. Additional Resources

Council of State Governments Justice Center, School Discipline Consensus Report, available at <http://csgjusticecenter.org/youth/school-discipline-consensus-report/>.

Mid-Atlantic Equity Consortium, available at <https://maec.org/>.

National Child Traumatic Stress Network, available at <http://www.nctsn.org/>.

Osher, D., Fisher, D., Amos, L., Katz, J., Dwyer, K., Duffey, T., & Colombi, G.D. (2015). *Addressing the root causes of disparities in school discipline: An educator's action planning guide*. Washington, DC: National Center on Safe Supportive Learning Environments. Available at: <https://safesupportivelearning.ed.gov/addressing-root-causes-disparities-school-discipline>.