



July 23, 2021

Office for Civil Rights
U.S. Department of Education
Potomac Center Plaza (PCP)
550 12th Street SW
Washington, DC 20024

RE: Request for Information Regarding the Nondiscriminatory Administration of School Discipline

Dear Office for Civil Rights Representative,

Five foundational partners (100 Black Men of America, Black Women’s Health Imperative, Delta Sigma Theta Inc., NAACP, and National Black Child Development Institute) have come to the table with the Council on Black Health to form the National Black Organization Partnership (The NBO Partnership) in 2019 to work in synergy on issues relevant to all organizations. The NBO Partnership represents more than 2 million voters, more than 3,000 chapters or affiliates, and decades of experiences in meeting the needs of Black communities, including advocacy for change.

The Partnership’s first initiative focuses on improving the quality of early childhood education for Black children by advocating for the broadened provision of wraparound services for young children in order to reduce incidents of classroom exclusion due to disciplinary action.

Of note, preschool children are being expelled at rates 3 times higher than found in kindergarten through 12th grade¹. And Black children are overrepresented in suspension activities, while they make up 19% of preschool enrollments 47% of children receiving out-of-school suspensions are African American¹. Classroom exclusion through suspension and expulsion disrupt access to quality education and stunts the positive effects of education on health even at this young age.

Addressing educational disparities is within the missions of the partnering organizations and is the primary mission of one partner. The early childhood focus was chosen because high quality early education is arguably the most critical factor determining not only subsequent educational trajectories but also long-term opportunity, health, and well-being and is an area of great disparity affecting Black children and their families with respect to access to needed supportive services.

As the Council on Black Health, we are clear about the positive link between education and health that has been long established and replicated across numerous analyses and disciplines. Suspensions and expulsions from school can interrupt the opportunity for high quality education and may result in lower educational attainment. Educational attainment often relates higher educational achievement to better jobs and income, and ultimately better health. Education also fosters a learned effectiveness that that acts as a deterrent to poor health outcomes.

The NBO Partnership urges the OCR to evaluate the benefits of wraparound services and provide such services to all school-aged children, particularly during early childhood as an alternative to classroom exclusion. This Partnership believes that universal access to strength-based wraparound services is an important step in realizing a more equitable education system, and a more prosperous and healthy future generation.

Sincerely,
The Council on Black Health
info@councilbh.org

¹ National Association for the Education of Young Children. (Washington, D.C., 2018); National Black Child Development Institute, “Delivering on the Promise: of Effective Early Childhood Education,” (Silver Spring, MD: 2018), 2.