



National Association for
College Admission Counseling

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May 9, 2018

The Honorable Betsy DeVos
Secretary of Education
United States Department of Education
400 Maryland Ave, SW
Washington, DC 20202

The Honorable Jefferson Sessions
Attorney General of the United States
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

The Honorable Alex Azar
Secretary of Health and Human Services
United State Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

The Honorable Kirstjen Nielsen
Secretary of Homeland Security
United States Department of Homeland Security
3801 Nebraska Ave NW
Washington, DC 20016

Dear Secretary DeVos, Attorney General Sessions, Secretary Azar, and Secretary Nielsen:

On behalf of the National Association for College Admission Counseling (NACAC), we appreciate the Federal Commission on School Safety's ("Commission") commitment to improving the safety of our schools nationwide, and the opportunity to share our recommendations on how to increase school safety.



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Founded in 1937, NACAC is an association of more than 16,000 members, including school counselors and college admission staff, who work with students making the transition from high school to postsecondary education (“college”). NACAC is committed to maintaining professional standards that foster ethical and social responsibility among those involved in the college application and enrollment process, as outlined in the NACAC’s SPGP: Code of Ethics and Professional Practices, which may be accessed on our [website](#). Through our advocacy efforts, we are also dedicated to ensuring that all students have access to high quality school counseling to help them make informed decisions as they prepare for and pursue college or career.

The deadly shooting that took place at Marjory Stoneman Douglas High School in Parkland, Florida on February 14 was just one example of gun-related violence targeted at students and schools. According to [Everytown for Gun Safety](#), there have been 38 shootings at elementary schools, high schools, colleges, or universities thus far in 2018; more than half of those have resulted in death or injury. On average, about one school shooting takes place in a school each week. When students are worried about mortal danger, they cannot focus on their academic responsibilities, a task which should be their primary objective at school.

NACAC members and other college admission counseling professionals work in schools, colleges, and universities throughout the country. Thus, we have a compelling interest in ensuring the safety not only of our students, but also of our members.

NACAC notes that gun violence in schools directly affects the college admission counseling profession in the following ways:

- School counselors spend an increasing amount of their limited time and capacity responding to threats of violence and/or providing students with counseling and other services when violence occurs, further detracting from their ability to deliver academic and postsecondary advising to students.
- Often, school safety officers outnumber school counselors. If student retention, mental health, and improved college access are our nation’s policy goals, this imbalance is not an educationally sound approach to educating our children, and is indicative of the outsized influence of gun violence on our society.
- College admission officers worry for their personal safety when traveling to scores of high schools each week to counsel and recruit students for higher education opportunities at their institutions.



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- Gun violence and “campus carry” policies at institutions of postsecondary education create potentially unsafe situations for the entire campus community, including students; faculty; administrators; day care centers; and campus visitors, including prospective students and high school students taking dual enrollment or similar courses.
- Incidents of gun violence may further discourage students in other countries from considering attending high school or college in the United States, which negatively impacts our schools and communities.

A comprehensive, long-term approach is needed to help prevent future incidents of gun violence from occurring in our nation’s schools. NACAC offers the following policy recommendations to contribute to the national discussion about preventing gun violence in our nation’s schools:

- **Address the easy access to semiautomatic weapons and accessories that increase their lethality.** While many proposals related to mental health and security improvements have been made over the years, there has been no recent attempt to address the role that weapons of war have played in escalating the death and injury toll in these incidents at US schools. Nor has any effort been made to ban the manufacturing and use of accessories, like bump stocks, that essentially circumvent current law. AASA: The School Superintendents Association has recommended common-sense gun safety proposals that should be given serious consideration by Congress.
- **Restore funding for programs aimed at minimizing violence—including gun violence—at schools in the US.** Programs like the Safe and Drug Free Schools Act and the Elementary and Secondary School Counseling Program, which Congress eliminated in 2015 in favor of state block grants with reduced funding levels under the Every Student Succeeds Act (ESSA), should be restored and fully funded.
- **Reject proposals to arm educators as a way to curb gun violence in schools.** NACAC members are trained to guide students through the transition to postsecondary education. In order for the educational enterprise to function properly, these professionals must not be sidetracked into a function that is best left to law enforcement officers. Moreover, research suggests that introducing *more* firearms into schools is likely to *increase* gun violence, not reduce it.
- **Provide funding for school districts to hire additional school counselors.** The current student-to-counselor ratio is 482-to-1 nationally, with ratios approaching 1,000-to-1 in some states. While policymakers speak of increasing attention to mental health in schools, little progress has been made in reducing student-to-counselor ratios nationally



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over the last 10 years. Decreasing this ratio is an opportunity to directly address the mental health of our students.

In 2014, the previous administration issued a guidance to assist states, districts, and schools in developing practices and strategies to enhance school climate in ways that comply with federal law. In particular, this Dear Colleague letter drew attention to the disparities amongst students who receive discipline at school, providing data that showed students of color, particularly Black students, were disciplined at significantly higher rates than their White peers. Even with this guidance, a recent [report](#) by the Government Accountability Office found that Black students, boys, and students with disabilities are disproportionately suspended and/or expelled in K-12 public schools across the United States.

Despite such suggestions from Members of Congress, the shooting that took place at Marjory Stoneman Douglas High School was not a result of this guidance. In fact, the student who was responsible for the shooting was, in fact, expelled for disciplinary violations. There are no statistically significant data that indicate the 2014 guidance has made schools less safe; thus, rolling it back would only make schools *less* safe for certain groups of students, countering the charge and mission of the Commission. It is important that the Commission consider the ways in which schools may be disproportionately unsafe for certain groups of students and work to ensure their safety.

NACAC appreciates the attention of the Commission to the important topic of school safety. Please contact [Michael Rose](#), Director of Government Relations, if NACAC can be of any support or with any questions regarding NACAC's public policy positions or advocacy.

Sincerely,

A handwritten signature in black ink that reads "Joyce K. Smith". The signature is written in a cursive, flowing style.

Joyce Smith, CEO