

Dear Chair and member of the Education Committee:

My name is Dr. Tracy Edwards. As a veteran educator with over 25 years of experience, researcher and policy analyst, I am writing to express my opposition to AB330 as currently written. While implementation of AB168 in 2019 was poorly managed, leaving educators unsupported, unprepared and simply unaware of guidance around student discipline, we must be cautious about returning to zero tolerance policies which have historically targeted Black and Brown students, as well as students with disabilities. Students in these subgroups were 3 to 4 times more likely to be suspended or expelled than their counterparts for the same behavior prior to AB168's passing in 2019.

I want to be extremely clear here; there were absolutely mistakes during implementation making it difficult to remove violent students from the classroom. **Under no circumstances should students that bring guns to school or violently attack school personnel or other students be allowed to remain in the classroom while a plan is developed.** Restorative Justice is by no means a cure-all and immediate removal is necessary in these cases, which I wholeheartedly support.. However, this bill is concerning for a few reasons.

Section 6 requires data around suspensions and expulsions be reported to the Superintendent of Public Instruction for the sake of providing oversight around disproportionate targeting of the populations mentioned above. However, I question how effective and timely reporting will be, given the large number of schools in Clark County. How long will students be removed from school, temporarily or permanently, while data is being collected? What safeguards will be put into place to protect students from disproportionate suspensions and expulsions while data is being collected, especially since schools won't be required to report these numbers until September of the following year? I also believe this should be the responsibility of the school and the local school board so that community based challenges and possible solutions can be at the forefront of any conversations around student and teacher safety.

Section 11 removes the hearing requirement before suspension or expulsion for certain pupils who: (1) pose a danger to other persons or property; (2) threaten to disrupt the academic process; (3) are selling or distributing a controlled substance. The language of point 2 is extremely vague, leaving the definition of a "threat" open to interpretation. The subjective nature of this wording could easily result in continued disproportionate suspensions/expulsions, feeding directly into the school to prison pipeline. Also there may be instances of first-time offenses that do not warrant an automatic expulsion. Any student under the threat of permanent expulsion should have the right to due process, which a hearing provides.

Section 7 of this bill authorizes a principal to restrict the ability of a teacher or staff member to temporarily remove a pupil from a classroom if the principal determines such removal to be unnecessary. Teachers are the closest to their students in a school environment and have insight around behaviors that others simply do not have. The culture of retaliation and intimidation is very real at many schools in Clark County. I am concerned that completely stripping away teachers' autonomy to even temporarily remove a potentially dangerous student

will lead to even more conflict and possibly further endanger teachers working with students every day, directly leading to even further teacher turnover.

Finally, although the implementation was poor, leading to misunderstandings around how school discipline should be handled, eliminating the state wide framework is a mistake. Instead of getting rid of it completely, we should be providing oversight around best practices, rolling out wide-scale training and providing resources to assist schools with understanding and utilizing restorative practices, which have been proven to be effective in school districts with similar demographics, while simultaneously allowing more flexibility in removing dangerous students from classrooms.

Respectfully,
Dr. Tracy Edwards