



May 11, 2017

To:

Dominic J. Mancini
Acting Administrator, Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

CC:

The Honorable John H. Thompson
Director, United States Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Jennifer Jessup,
Departmental Paperwork Clearance Officer,
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Sent via email: OIRA_Submission@omb.eop.gov; jjessup@doc.gov

Attn: FR Doc. [2017-07159](#); OMB Control No. 0607-0990, Removal of Question on National Survey of Children's Health

Dear Mr. Mancini:

The Committee for Children (CfC) would like you to reconsider the proposed removal of the preschool suspension question from the National Survey of Children's Health. The question provides important research information on the rates of suspension and has huge policy implications in determining how to address the racially disproportionate rates of exclusionary discipline. Moreover, this is the only data collection done in preschools operated outside of public schools; the Department of Education's Civil Rights Data Collection is limited to those preschools operated in a public school setting. As you know, data collected from the survey has highlighted an alarming trend that many organizations are now beginning to address through programs, practices and policies.

CfC is a global nonprofit dedicated to fostering the safety and well-being of children through education and advocacy. CFC is the world's largest provider of research-based educational programs that promote social-emotional skills and prevent bullying and sexual abuse. The organization's curricula reach more than 10 million children in 26,000 schools around the world. As we and other providers seek research based methods to serve children who may be subjected to abuse, neglect and trauma, we are perplexed by the agency's reasons for identifying preschool suspension as the one item to eliminate from the National Survey of Children's Health (NSCH).

Surveys such as the NSCH provide rich data on the physical and mental well-being of children. Conducted in 2003, 2007, 2012 and 2016, this survey has been beneficial to the field. The very purpose of the NSCH is to enable the Maternal and Child Health Bureau (MCHB) of the Health Resources and Services Administration (HRSA) "to produce national and state-based estimates on the health and well-being of children, their families, and their communities as well as estimates of the prevalence and impact of children with special health care needs." A September 2016 [article](#) on the Data Resource Center for Child & Adolescent Health's own website explains why collection of this data is so important.



It reads, "About 35 million children in the United States are living with emotional and psychological trauma, according to 2012 National Survey of Children's Health data available at the Data Resource Center. However, less than a third of these children have access to a school psychologist or even a social worker. African American, Hispanic, and Native American children are not only more likely to experience multiple traumas, but also to live in poverty. Even so, little attention has been paid to the link between trauma and disruptive behavior in classrooms. Rather than addressing behavioral issues through disciplinary action, schools should provide support to students who may be under severe psychological distress."

In order to know which students may need additional support, it is critical to know where suspension and expulsion disparities are occurring. The addition of the question on the 2016 survey directly addresses part of this glaring research gap. Currently, most research on the issue is insufficient, as the Gilliam Studyⁱ only assumes a rate of expulsion of 6.7 out of 1,000 children in state-funded pre-Kindergarten. Additional research from the Office of Civil Rights data collection is limited as it only analyzes public preschool programs and relies on a school district's self-reported data of student counts. Coupled with parent responses, researchers and program providers could get a far clearer picture of the impact of pre-Kindergarten suspension and expulsion, which could greatly improve targeted early childhood educator training.

As you proceed with determining how best to streamline the survey for efficiency and clarity, we would ask you not remove this question which is of critical research value. Thank you for your consideration of CfC's comments.

Sincerely,

Joan Duffell
Executive Director

ⁱ Gilliam, W.S., 2005. Pre-kindergarteners left behind: Expulsion rates in state prekindergarten systems. Policy Brief series no. 3. New York, NY: Foundation for Child Development