

May 20, 2021

Ruth Ryder  
OESE Deputy Assistant Secretary for Policy and Programs  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

**Re: Comments from GLSEN regarding proposed priorities for Effective Educator Development programs [Docket ID ED-2021-OESE-0045]**

Dear Ms. Ryder:

I write to you on behalf of GLSEN, the nation’s leading organization on lesbian, gay, bisexual, transgender, queer, and questioning (LGBTQ+) issues in K-12 education, regarding the Department’s proposed priorities for Effective Educator Development programs.

As an organization working to ensure that all LGBTQ+ young people and educators are safe and have equal opportunities to thrive, grow, and reach their full potential, GLSEN is committed to advancing racial, gender, and disability justice. GLSEN strongly supports the Department’s prioritization of diversity through professional development that advances equity for historically underserved students as well as through the recruitment, retention, and advancement of diverse and underrepresented educators. To strengthen these proposed priorities, GLSEN urges OESE to further enumerate diversity with regard to sexual orientation, gender identity, and gender expression within two of the proposed priorities.

With regard to Proposed Priority 1—Supporting Educators and Their Professional Growth—GLSEN asks that OESE enumerate LGBTQ+ young people alongside “students from low-income backgrounds, students of color, [and] students with disabilities” as historically underserved students.<sup>1</sup> GLSEN further asks that the Department add a new project focus (e), for projects that provide high-quality professional development opportunities to all educators in high-needs schools on equitable and affirming treatment of diverse and historically underserved students, including LGBTQ+ youth, and particularly those who are Black, Indigenous, people of color (BIPOC), and people with disabilities.

GLSEN’s 2019 National Climate Survey found that the vast majority (86.3%) of LGBTQ+ students experienced harassment or assault based on personal characteristics, such as their sexual orientation, gender identity, or gender expression, and a majority (59.1%) reported personally experiencing LGBTQ-related discriminatory policies or practices.<sup>2</sup> Hostile school climates for LGBTQ+ students are associated with a range of adverse educational outcomes that can have long-lasting impacts, including increased absences, lowered GPAs, and a decreased likelihood of pursuing post-secondary education. Anti-LGBTQ+ harassment, assault, and discrimination are also associated with lower self-esteem and higher levels of depression.<sup>3</sup> Students who hold multiple marginalized identities experience starker and often unique disparities. GLSEN’s research

has shown that LGBTQ+ youth of color who experienced both racist and anti-LGBTQ+ victimization were most likely to skip school due to feeling unsafe, reported the lowest levels of school belonging, and experienced the highest levels of depression, compared to those who experienced one or neither form of victimization.<sup>4</sup>

Educators have a critical role to play in effectively responding to anti-LGBTQ+ attitudes and behaviors. Unfortunately, we have seen insufficient change in educator responses to anti-LGBTQ+ harassment and assault over twenty years. Nearly half (46.6%) of LGBTQ+ students who heard homophobic remarks in the presence of educators reported that educators never intervened and only 13.7% reported that school personnel intervened most of the time or always. Staff intervention in the face of negative remarks about gender expression is less common and has actually decreased since 2003.<sup>5</sup>

In fact, educators participate in enabling hostile climates through their actions and inaction. Since 2001, a majority of LGBTQ+ students have reported hearing anti-LGBTQ+ remarks from teachers or other staff.<sup>6</sup> When students report anti-LGBTQ+ victimization, many schools fail to respond effectively. Most commonly, students reported that staff did nothing or told them to ignore it.<sup>7</sup> Further, one in five students (20.8%) reported that they were told to change their behavior by, for example, changing the way they dressed,<sup>8</sup> and 7.3% reported being disciplined after reporting their victimization to an authority.<sup>9</sup> LGBTQ+ youth of color and LGBTQ+ youth with disabilities may be more likely to be disciplined for reporting harassment given disparities in disciplinary action: Black, Native American/Alaskan Native, Latinx, Arab American/Middle Eastern/North African, and multiracial LGBTQ+ youth experience more school disciplinary action than white LGBTQ+ youth<sup>10</sup> and LGBTQ+ youth with disabilities are more likely to experience disciplinary action than LGBTQ+ youth without disabilities.<sup>11</sup>

We know through decades of research that the presence of supportive adults in a school can be determinative in whether LGBTQ+ young people are safe and included in K-12 learning communities. Educators have a powerful role to play in fostering LGBTQ+ inclusive learning environments, such as providing one-on-one support to LGBTQ+ students, including LGBTQ+ topics in their curriculum, and educating other staff or advocating for staff training about LGBTQ+ issues. However, in a national survey of secondary school teachers, only half (50.3%) reported engaging in LGBTQ+-inclusive and supportive practices.<sup>12</sup> A large majority (73.6%) of teachers who did not engage in LGBTQ+ inclusive and supportive teaching practices at all or as much as they would have liked, indicated that they faced at least one barrier to doing so, such as that their administration would not support their efforts. This may indicate a lack of guidance or leadership from their administrators with regard to equity and inclusion of LGBTQ+ students.<sup>13</sup>

By enumerating LGBTQ+ young people among historically underserved students and dedicating a project area to high-quality professional development for educators on equitable and affirming treatment of diverse and historically underserved students, the Department would signal that professional development on inclusive, affirming practices for LGBTQ+ and other historically underserved students is a priority and an important component of professional growth for teachers and administrators.

With regard to Proposed Priority 2—Increasing Educator Diversity—GLSEN urges OESE to enumerate LGBTQ+ diversity alongside “racial, cultural, and linguistic diversity.” GLSEN further asks that the Department amend project focus (g) to read as follows: “High-quality professional development on addressing bias in instructional practice and fostering an inclusive, equitable, and supportive workplace and school climate for educators, especially for educators of color, LGBTQ+ educators, educators with disabilities, and multi-lingual educators.”

All educators can create supportive learning environments by engaging in LGBTQ+-inclusive and supportive practices and challenging anti-LGBTQ+ attitudes and behaviors. Even so, GLSEN has found that LGBTQ+ teachers are more likely than non-LGBTQ+ teachers to engage in LGBTQ+-inclusive and affirming practices. Notably, LGBTQ+ educators are far more likely to engage in LGBTQ+-inclusive practices in public, visible ways. A national GLSEN survey of secondary school teachers found that LGBTQ+ educators were more than twice as likely to include the stories or contributions of LGBTQ+ people in their curriculum (31.5% vs. 14% for non-LGBTQ+ teachers). LGBTQ+ teachers were also nearly three times as likely to educate other staff or advocate for staff training about LGBTQ+ issues (25.2% vs. 8.9%) and to advocate for LGBTQ+ inclusive school or district policies (21.7% vs. 7.8%).<sup>14</sup> These findings mirror those that the Department cites with regard to the association between educators of color and more equitable outcomes for youth of color,<sup>15</sup> and of course, many LGBTQ+ teachers are also educators of color.

LGBTQ+ teachers often lead innovations on ways to ensure welcoming school climates for LGBTQ+ students despite being more likely than their non-LGBTQ+ peers to report barriers to doing so. Over one-fifth of LGBTQ+ teachers (21.5%) reported that their administration would not support their efforts (vs. 10.5% of non-LGBTQ+ teachers) and one in ten LGBTQ+ teachers (11.1%) said that engaging in LGBTQ+-inclusive and supportive practices jeopardized their employment (vs. 7.4% of non-LGBTQ+ teachers).<sup>16</sup> Further, one-third of LGBTQ+ educators (33.9%) fear that their job would be at risk if they came out to an administrator.<sup>17</sup>

LGBTQ+ educators, including those who are transgender, nonbinary, BIPOC, and people with disabilities, can serve as positive role models for all students, help break down negative stereotypes, prepare students to live and work in our diverse society, and help address disparities in academic outcomes. By enumerating LGBTQ+ educators in Proposed Priority 2, OESE would communicate that LGBTQ+ educators are fully welcome and valued for all of who they are and what they contribute to our nation’s schools.

The inclusion of diversity with regard to sexual orientation, gender identity, and gender expression aligns with the Administration’s intersectional policy on advancing racial equity as communicated in E.O. 13985 of January 20, 2021,<sup>[18]</sup> as well as its policy to prevent and combat discrimination on the basis of gender identity and sexual orientation and “to address overlapping forms of discrimination,” communicated in E.O. 13988 of January 20, 2021.<sup>[19]</sup> Such inclusion also supports the implementation of E.O. 14021 of March 8, 2021, guaranteeing an educational environment free from discrimination on the basis of sexual orientation or gender identity by prioritizing a proven support for students who identify as LGBTQ+ students - LGBTQ+ inclusive and supportive educators.<sup>[20]</sup>

GLSEN's research conducted over the past twenty years has consistently found a positive association between supportive educators and outcomes for LGBTQ+ students.<sup>21</sup> Compared with LGBTQ+ students who reported they had no or few supportive educators, those who had many supportive educators reported that they were less likely to miss school due to safety concerns; less likely to feel unsafe because of their sexual orientation and gender expression; had higher levels of self-esteem and lower levels of depression; reported greater feelings of connectedness to their school community; and had higher GPAs. These findings are consistent across LGBTQ+ students of color.<sup>22</sup> LGBTQ+ inclusive and supportive educator practices may also be related to racially inclusive and supportive educator practices. GLSEN has found that LGBTQ+ Black, Indigenous, Latinx, and Asian American and Pacific Islander students who reported they had many LGBTQ+ supportive educators were less likely to report feeling unsafe because of their race/ethnicity when compared to those who had no or few LGBTQ+ inclusive and supportive educators.<sup>23</sup>

GLSEN urges the OESE to implement the Administration's policy of addressing intersecting forms of discrimination by adding LGBTQ+ communities to its proposed priorities for Effective Educator Development programs. To discuss GLSEN's recommendations, please contact me at 202-621-5815 or [aaron.ridings@glsen.org](mailto:aaron.ridings@glsen.org).

Sincerely,

Aaron Ridings  
Interim Chief of Staff  
Director of Public Policy

---

<sup>1</sup> Proposed Priorities- Effective Educator Development Division Programs. 86 Fed. Reg. §74 (April 20, 2021). <https://www.federalregister.gov/documents/2021/04/20/2021-08193/proposed-priorities-effective-educator-development-division-programs>.

<sup>2</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p. xvii. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>.

<sup>3</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p. xviii-xix. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>.

<sup>4</sup> Truong, N. L., Zongrone, A. D., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Asian American and Pacific Islander LGBTQ youth in U.S. Schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-AAPI-2020.pdf>.

Truong, N. L., Zongrone, A. D., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Black LGBTQ youth in U.S. Schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-ResilienceBlack-2020.pdf>.

Zongrone, A. D., Truong, N. L., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Latinx LGBTQ youth in U.S. Schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-ResilienceLatinx-2020.pdf>.

Zongrone, A. D., Truong, N. L., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Native and Indigenous LGBTQ youth in U.S. Schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-andResilience-Native-2020.pdf>.

<sup>5</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p. 22-23, 133-234. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>.

<sup>6</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p. 132. New York: GLSEN.

- 
- <sup>7</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p.35. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>.
- <sup>8</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p.35. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>.
- <sup>9</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p.35. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>.
- <sup>10</sup> Kosciw, J. G., Clark, C. M., Truong, N. L., & Zongrone, A. D. (2020). The 2019 National School Climate Survey: The experiences of lesbian, gay, bisexual, transgender, and queer youth in our nation's schools, p. 112. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>.
- <sup>11</sup> Palmer, N. A., Greytak, E. A., Kosciw, J. G. (2016). Educational exclusion: Drop out, push out, and school-to-prison pipeline among LGBTQ youth, p. 30. New York: GLSEN. [https://www.glsen.org/sites/default/files/2019-11/Educational\\_Exclusion\\_2013.pdf](https://www.glsen.org/sites/default/files/2019-11/Educational_Exclusion_2013.pdf).
- <sup>12</sup> GLSEN. (2020). Supporting LGBTQ Students by Protecting LGBTQ Teachers (Research Brief). New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-08/LGBTQ%20Supportive%20Teaching%20Brief%20.pdf>.
- <sup>13</sup> GLSEN. (2020). Supporting LGBTQ Students by Protecting LGBTQ Teachers (Research Brief). New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-08/LGBTQ%20Supportive%20Teaching%20Brief%20.pdf>.
- <sup>14</sup> GLSEN. (2020). Supporting LGBTQ Students by Protecting LGBTQ Teachers (Research Brief). New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-08/LGBTQ%20Supportive%20Teaching%20Brief%20.pdf>.
- <sup>15</sup> GLSEN. (2020). Supporting LGBTQ Students by Protecting LGBTQ Teachers (Research Brief). New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-08/LGBTQ%20Supportive%20Teaching%20Brief%20.pdf>.
- <sup>16</sup> GLSEN. (2020). Supporting LGBTQ Students by Protecting LGBTQ Teachers (Research Brief). New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-08/LGBTQ%20Supportive%20Teaching%20Brief%20.pdf>.
- <sup>17</sup> GLSEN. (2020). Supporting LGBTQ Students by Protecting LGBTQ Teachers (Research Brief). New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-08/LGBTQ%20Supportive%20Teaching%20Brief%20.pdf>.
- <sup>18</sup> Executive Order 13985 of January 20, 2021. 86 Fed. Reg. §14 (January 25, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01753.pdf>.
- <sup>19</sup> Executive Order 13988 of January 20, 2021. 86 Fed. Reg. §14 (January 25, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01761.pdf>.
- <sup>20</sup> Executive Order 14021 of March 8, 2021. 86 Fed. Reg. §46 (March 11, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-03-11/pdf/2021-05200.pdf>.
- <sup>21</sup> GLSEN. (March 2020). Curricular Standards that Include LGBTQ+ Representation Promote Student Achievement and Wellbeing. <https://www.glsen.org/activity/inclusive-curriculum-standards>.
- <sup>22</sup> Truong, N. L., Zongrone, A. D., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Black LGBTQ youth in U.S. schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-Black-2020.pdf>.
- Zongrone, A. D., Truong, N. L., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Latinx LGBTQ youth in U.S. schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-Latinx-2020.pdf>.
- Truong, N. L., Zongrone, A. D., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Asian American and Pacific Islander LGBTQ youth in U.S. schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-AAPI-2020.pdf>.
- Zongrone, A. D., Truong, N. L., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Native American, American Indian, and Alaska Native LGBTQ youth in U.S. schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-Native-2020.pdf>.
- <sup>23</sup> Truong, N. L., Zongrone, A. D., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Black LGBTQ youth in U.S. schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-Black-2020.pdf>.
- Zongrone, A. D., Truong, N. L., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Latinx LGBTQ youth in U.S. schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-Latinx-2020.pdf>.
- Truong, N. L., Zongrone, A. D., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Asian American and Pacific Islander LGBTQ youth in U.S. schools. New York: GLSEN. <https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-AAPI-2020.pdf>.

---

Zongrone, A. D., Truong, N. L., & Kosciw, J. G. (2020). Erasure and resilience: The experiences of LGBTQ students of color, Native American, American Indian, and Alaska Native LGBTQ youth in U.S. schools. New York: GLSEN.  
<https://www.glsen.org/sites/default/files/2020-06/Erasure-and-Resilience-Native-2020.pdf>.