



November 16, 2021

Juliana Pearson,
PRA Coordinator, Strategic Collections and Clearance
Governance and Strategy Division
Office of the Chief Data Officer, Office of Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: National Evaluation of the 2019 Comprehensive Centers Program Grantees [ED-2021-SCC-0134; Docket #2021-20065]

Dear PRA Coordinator Juliana Pearson,

I write to you regarding measures to advance inclusion and equity for lesbian, gay, bisexual, transgender, queer, nonbinary, and intersex (LGBTQ+) people in the Department's proposed national evaluation of the 2019 Comprehensive Centers Program Grantees. As the leading national organization on LGBTQ+ issues in K-12 education, GLSEN urges revisions to add a strong and explicit focus on intersectional, LGBTQ+ inclusive equity in evaluating the Comprehensive Centers program. These recommendations are informed by our Research Institute, which was the first to regularly conduct national surveys on LGBTQ+ issues in schools, having launched our biennial National School Climate Survey in 1999.

GLSEN's urges the Department to revise the proposed instruments to enumerate "lesbian, gay, bisexual, transgender, queer, nonbinary, and intersex (LGBTQ+) students" among examples of "Diverse Learners." This revision would apply to question 2 of the TA Recipient Survey (p. C-2), question 17 (a) of the Regional Center Director Interview Protocol (p. C-27), and question 15 (a) of the National Center Director Interview Protocol (p. C-39). Expressly including LGBTQ+ students is important because, as the Department acknowledges,¹ LGBTQ+ students experience marginalization and unique barriers in K-12 education systems. For example, LGTBQ+ young people experience higher rates of bullying than their non-LGBTQ+ peers.² GLSEN's most recent National School Climate Survey found that the vast majority (81.0%) of LGBTQ+ students reported being verbally harassed, more than one three (34.2%) reported being physically harassed, and 14.8% reported being physically assaulted at school in the past year based on their sexual orientation, gender identity, or gender expression.³

GLSEN strongly supports the inclusion of questions about the impact of the COVID-19 pandemic in question 17 of the TA Recipient Survey (pp. C-13–C-14), question 15 of the Regional Center

Director Interview Protocol (p. C-26), question 13 of the National Center Director Interview Protocol (pp. C-37 – C-38), and accompanying responses related to supporting “students’ social, emotional, and mental health needs” and supporting “students with disabilities.” However, GLSEN urges the Department to revise these measures to include responses related to supporting all student groups disproportionately impacted by COVID-19, including LGBTQ+ students.

Many LGBTQ+ young people experience rejection from family members; for those who do, social distancing, shifts to virtual learning, and quarantining increases their exposure to unsupportive, discriminatory, or violent home environments.⁴ Social distancing, virtual learning, quarantining, and other responses to the COVID-19 pandemic can also limit access to supportive before, during, and after school programs, such as GSAs (Gender and Sexuality Alliances or Gay-Straight Alliances) and school-based mental healthcare services.⁵ As LGBTQ+ youth return to in-person instruction, they bring with them the harmful impacts of the COVID-19 pandemic on their mental health, their families and home-life, and their communities. GLSEN’s initial analysis indicates that at least 19 state education agencies have enumerated LGBTQ+ students in resources related to uses of federal COVID-19 relief funds.⁶ By revising this study to expressly include LGBTQ+ students in measures related to the impact of the COVID-19, the Department will help to illuminate the role of Comprehensive Centers in assisting state and local education agencies to identify and address the barriers LGBTQ+ students face owing to the pandemic.

Ideally, the Department will separately list each student group that the Department has identified as disparately impacted by the COVID-19 pandemic, including LGBTQ+ students.⁷ For example, the Department would add “Specific ways to support LGBTQ+ students” to question 17 of the TA Recipient Survey (pp. C-13–C-14) and “Supporting LGBTQ+ students” to question 15 of the Regional Center Director Interview Protocol (p. C-26) and question 13 of the National Center Director Interview Protocol (pp. C-37 – C-38). Additionally, the Department would add responses related to supporting students of color or addressing racial disparities in COVID-19 impacts. Finally, the Department would replace “Specific ways to support students experiencing homelessness, students in migrant families, or students in foster care” (p. C-14) and “Supporting students experiencing homelessness, students in migrant families, or students in foster care” (pp. C-26, C-38) with three separate responses related to supporting “students experiencing homelessness,” “students in migrant families,” and “students in foster care.”

Separately listing supports for each student group that the Department has identified as disparately impacted by the COVID-19 pandemic will generate the strongest data on the ability of Comprehensive Centers to support technical assistance recipients in addressing identified disparities, particularly for students with intersecting experiences of marginalization. The Department has acknowledged the importance of COVID-19 responses that address the needs of students with intersecting experiences of marginalization. For example, in *Strategies for Using American Rescue Plan Funding to Address the Impact of Lost Instructional Time*, the Department urges programs and activities that reengage and support youth who have been consistently absent, including “LGBTQ+ students, especially LGBTQ+ students who are Black or Native American.”⁸

Similarly, the *ED COVID-19 Handbook, Volume 2: Roadmap to Reopening Safely and Meeting All Students' Needs* applies an intersectional lens in discussing how “LGBTQ+ students, especially those who are Black or Native American, are more likely than others to be homeless.”⁹

As an interim step, if separately listing each student group that has experienced disparate impacts of the COVID-19 pandemic will require further testing or review, the Department can add a response to question 17 of the TA Recipient Survey (pp. C-13–C-14), question 15 of the Regional Center Director Interview Protocol (p. C-26), and question 13 of the National Center Director Interview Protocol (pp. C-37 – C-38) related to supports for “other students disproportionately impacted by the COVID-19 pandemic, including students of color and LGBTQ+ students.”

Technical assistance to states and districts, including via the Comprehensive Centers program, is a critical means of advancing intersectional, LGBTQ+ inclusive equity in K-12 education systems through the sharing of best practices and dissemination of evidence-based interventions. Taken together, GLSEN’s recommended revisions will bring this important study into alignment with President Biden’s Executive Orders—including those on implementing the landmark Bostock ruling, advancing gender equity and equality, and advancing racial equity and support for underserved communities—which collectively call for an “ambitious whole-of-government equity agenda.”¹⁰

We appreciate the efforts of the Department to ensure that Comprehensive Centers enable state and local education agencies to address disparities and provide learning environments that are equitable for all students. To discuss the recommendations that we raised in this comment, please contact me at 202-621-5815 or aaron.ridings@glsen.org.

Sincerely,

Aaron Ridings
Interim Chief of Staff
Director of Public Policy

¹ U.S. Department of Education and U.S. Department of Justice. (June 2021). *Confronting Anti-LGBTQI+ Harassment in Schools: A Resource for Students and Families*. <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-factsheet-tix-202106.pdf>.

U.S. Department of Education. (June 2021). *Supporting Transgender Youth in Schools*. <https://www2.ed.gov/about/offices/list/ocr/docs/ed-factsheet-transgender-202106.pdf>.

U.S. Department of Education and U.S. Department of Justice. (October 2021). *Supporting Intersex Students: A Resource for Students, Families, and Educators*. <https://www2.ed.gov/about/offices/list/ocr/docs/ocr-factsheet-intersex-202110.pdf>.

² Johns, M. M., Lowry, R., Haderxhanaj, L. T., Rasberry, C. N., Robin, L., Scales, L., Stone, D., & Suarez, N. A. (2020). Trends in Violence Victimization and Suicide Risk by Sexual Identity Among High School Students - Youth Risk Behavior Survey, United States, 2015-2019. *MMWR supplements*, 69(1), 19–27. <https://doi.org/10.15585/mmwr.su6901a3>.

Earnshaw, V. A., Reisner, S. L., Juvonen, J., Hatzenbuehler, M. L., Perrotti, J., & Schuster, M. A. (2017). LGBTQ Bullying: Translating Research to Action in Pediatrics. *Pediatrics*, 140(4).

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5613818/>.

³ Kosciw, J. G., Clark, C. N., 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*. New York: GLSEN. <https://www.glsen.org/research/2019-national-school-climate-survey>. (pp. 28-29).

⁴ According to the Trevor Project' 2021 LGBTQ Youth Mental Health Survey, more than 80% of LGBTQ+ youth reported that COVID-19 made their living situation more stressful. See: The Trevor Project, National Survey on LGBTQ Youth Mental Health 2021, "Covid-19" (2021). <https://www.thetrevorproject.org/survey-2021/?section=Covid19>.

See also: Fish, J. N., McInroy, L. B., Paceley, M. S., Williams, N. D., Henderson, S., Levine, D. S., Edsallf, R. N. (2020). "I'm Kinda Stuck at Home with Unsupportive Parents Right Now": LGBTQ Youths' Experiences with COVID-19 and the Importance of Online Support. *The Journal of Adolescent Health* 67, 3. doi:10.1016/j.jadohealth.2020.06.002.

Salerno, J. P., Williams, N. D., Gattamorta, K. A. (2020). LGBTQ populations: Psychologically vulnerable communities in the COVID-19 pandemic. *Psychological Trauma: Theory, Research, Practice and Policy* 12, Suppl 1. doi:10.1037/tra0000837.

⁵ Fish et al.; Salerno et al.

⁶ Alaska, California, DC, Kansas, Kentucky, Illinois, Maine, Massachusetts, Michigan, Nebraska, Nevada, New Jersey, New Mexico, Ohio, Oregon, Pennsylvania, Rhode Island, and Utah have approved ARP/ESSER State Plans for using Covid-19 Relief funds that include discussion of LGBTQ+ students. See: State Plans available here: <https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-and-secondary-school-emergency-relief/stateplans/> (Accessed November 16, 2021).

Other state education agencies are addressing the needs of LGBTQ+ students via guidance to local education agencies on uses of ARP/ESSER Covid-19 relief funds. For example, Wisconsin includes training on "[c]reating safe and supportive environments for LGBTQ Youth" and lists an approved vendor as an allowable use of ESSER funds in its guidance to Local Education Agencies. See: Wisconsin Department of Public Instruction. ESSER Funds (I, II, and III) Guidance on Public Allowable Costs. Available at <https://docs.google.com/document/d/1K78BQsDluMQ0aDTzd0Qb1gOKmLXVhfRYkBzXm6S3bCY/edit> (Accessed November 16, 2021). (p. 23).

⁷ U.S. Department of Education. (2021). *Education in a Pandemic: The Disparate Impacts of COVID-19 on America's Students*. Washington, DC. <https://www2.ed.gov/about/offices/list/ocr/docs/20210608-impacts-of-covid19.pdf>. (pp. 1, 27-30, 45-48).

⁸ U.S. Department of Education. (August 2021). *Strategies for Using American Rescue Plan Funding to Address the Impact of Lost Instructional Time*. Washington, DC. Available at: <https://www2.ed.gov/documents/coronavirus/lost-instructional-time.pdf>. (pp. 4, 11-12).

⁹ U.S. Department of Education. (April 2021). *ED COVID-19 Handbook, Vol. 2: Roadmap to Reopening Safely and Meeting All Students' Needs*. Washington, DC. <https://www2.ed.gov/documents/coronavirus/reopening-2.pdf>. (pp. 9, 12, 14).

¹⁰ Executive Order 13985 of January 20, 2021 (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government). 86 Fed. Reg. §14 (January 25, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01753.pdf>.

Executive Order 13988 of January 20, 2021 (Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation). 86 Fed. Reg. §14 (January 25, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01761.pdf>.

Executive Order 14021 of March 8, 2021 (Guaranteeing an Educational Environment Free From Discrimination on the Basis of Sex, Including Sexual Orientation or Gender Identity). 86 Fed. Reg. §46 (March 11, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-03-11/pdf/2021-05200.pdf>.