

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
Sent via email: OIRA_Submission@omb.eop.gov

RE: OMB Control Number: 0607-0990

Dear Mr. Mancini,

RE: Proposed removal of Survey Item G22 to National Survey of Children's Health
OMB Control No. 0607-0990

To Whom It May Concern:

Thank you for the opportunity to provide comments on proposed modifications to the National Survey of Children's Health 2017.

The undersigned organizations, many of whom who contributed to the development of the joint statement on [Standing Together Against Suspension & Expulsion in Early Childhood](#) are writing to express our objection to the removal of Survey Item G22, which assesses the incidence of preschool suspensions and expulsions for children ages 0-5.

Because the inclusion of this question created the first nationally-representative, large-scale dataset on early childhood suspension and expulsion in multiple settings from a parent's perspective, the removal of this question would mean the loss of valuable data that illuminates the important role of parents in addressing this critical issue.

Available data suggest that preschool suspension and expulsion occur at alarming rates, are associated with negative developmental and educational outcomes, and disproportionately affect Black boys and girls, contributing to racial disparities in access to educational opportunities.

Early childhood is a critical time in a child's development. Any negative and stressful events during that time—including expulsion and suspension—can harm the child's development and jeopardize their future educational and life outcomes. Exclusionary discipline has no place in learning environments; all children deserve to experience inclusive and affirming high-quality education. Expulsion and suspension can also have a negative impact on parents and their workplaces, as they are obligated to miss work to pick up or stay home with their children, thereby increasing stress for the family.

Data collection and analysis is a critical component of raising awareness about preschool expulsion and suspension in early childhood settings and tracking progress on reducing incidences. Elimination of this survey item from the National Survey of Children's Health would miss a critical opportunity to obtain nationally representative data on the incidence of child care and preschool suspensions and expulsions, from a parent's perspective, which are not collected in any other survey. These data would also allow for

comparisons to data on suspension and expulsion collected not from parents, but from administrators, as collected by the U.S. Department of Education Office of Civil Rights (OCR). A key difference in the OCR data, however, is that while these data track preschool expulsion, they are limited to preschool programs operated by public schools, which are only a subset of state-funded preschool and early childhood settings where expulsions occur. The OCR data estimate that as many as 8,710 3- and 4- year-old children may be expelled from or pushed out of their state-funded preschool or prekindergarten classrooms annually—a rate nearly three times that of older students in K-12.¹ This information is critically important to shedding light on this issue but is nevertheless insufficient for fully understanding the extent of suspensions and expulsions during the early years. Keeping the question in the National Survey of Children’s Health would not create an appreciable burden for parents responding to the survey, while providing valuable information to all parents.

We urge you to reconsider the removal of Item G22 and to maintain this important data point to support parent, school, and community efforts to prevent, reduce, and ultimately eliminate expulsion and suspension in early childhood settings in order to advance educational equity and opportunity for all young children.

Sincerely,

American Academy of Pediatrics
American Federation of Teachers
American Psychological Association
Attendance Works
BUILD Initiative
Children’s Defense Fund
Child Care Aware of America
Center for Law and Social Policy
Defending the Early Years
Division for Early Childhood of the Council for
Exceptional Children
Early Care and Education Consortium
Educare Learning Network
First Focus
First Five Years Fund
FirstSchool
HighScope Educational Research Foundation
IDEA Infant Toddler Coordinators Association
MomsRising
National Association for the Education of Young
Children

National Association for Elementary School
Principals
National Association for Family Child Care
National Association of Early Childhood
Specialists in State Departments of Education
National Association of Early Childhood Teacher
Educators
National Association of State Directors of
Special Education
National Black Child Development Institute
National Council of La Raza
National Education Association
National Head Start Association
National Urban League
National Women’s Law Center
Nemours Children’s Health System
New America
Ounce of Prevention Fund
Save the Children
Save the Children Action Network
ZERO TO THREE

¹ http://www.naeyc.org/files/naeyc/Standing%20Together.Joint%20Statement.FINAL__9.pdf