



July 24, 2020

Democratic Party Platform Drafting Committee
The Democratic National Committee
430 South Capitol St SE
Washington, DC 20003

Dear DNC Party Platform Drafting Committee Members:

On behalf of the National Urban League, UnidosUS, LULAC, and the National Action Network (NAN), the nation's leading civil rights and racial justice organizations dedicated to social and economic empowerment of African Americans, Latinx, and other underserved communities, we thank you for the opportunity to submit our feedback on the Biden-Sanders Unity Taskforce recommendations on education and the July 21 draft of the Democratic National Committee Party Platform's education priorities.

Education is the key to economic empowerment. For a combined 200 plus years, our organizations have fought to uproot racial inequities in our public education system. While we agree with many of the recommendations offered to ensure every child has the resources and opportunity to succeed, Congress and the next Administration should be intentional about rooting out the systemic racism in our education system that has disadvantaged Black students, Latinx students, and other students of color for generations. In addition, the K-12 accountability language, as drafted, would undercut the use of student proficiency data to illuminate gaps in educational opportunity, for which civil rights advocates have long fought.

Inequities in our public education system stem from 400 years of systemic racism and federally-sanctioned discriminatory policies that have denied Black, Latinx, and other students of color the right to a free and public education. Slavery, Jim Crow laws, language discrimination, and the *Plessy v. Ferguson* Supreme Court ruling of 1896 declaring separate but equal public schools legal created a second-class system of education for children of color in America. Even though the Supreme Court outlawed *de jure* school segregation in 1954, many states and localities retaliated, leaving generations of students in subpar schools. These historic injustices have had lingering effects in our current school system and education outcomes.

System racism in our nation's schools has robbed resources and opportunities for Black, Latinx, and other children of color necessary to succeed. For example, students of color are:

- more likely to attend impoverished schools than their White peers;¹
- less likely to have access to high rigor courses like AP, IB, and STEM;²
- less likely to have access to high-quality teachers;³
- less likely to have access to high speed internet and technological devices;⁴
- less likely to have social and emotional learning supports and positive behavioral interventions⁵;
- and are more likely to have police and/or school resource officers than guidance counselors.⁶

¹ <https://www.epi.org/publication/schools-are-still-segregated-and-black-children-are-paying-a-price/>

² <https://www.ibhe.com/2019/08/the-racial-gap-in-participation-in-high-school-ap-ib-and-dual-enrollment-programs/>

³ <https://www.epi.org/publication/the-teacher-shortage-is-real-large-and-growing-and-worse-than-we-thought-the-first-report-in-the-perfect-storm-in-the-teacher-labor-market-series/>

⁴ <https://nul.org/news/new-analysis-shows-students-color-more-likely-be-cut-online-learning>

⁵ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5142755/>

⁶ <https://tcf.org/content/commentary/school-policing-racially-discriminatory/?agreed=1>



As a result, Black and Latinx students are graduating from high school and earning a college degree at rates that pale in comparison to their White counterparts—40 percent and 54 percent respectively, compared to 64 percent⁷, while also being disproportionately referred to the criminal justice system as their White peers are referred to their guidance counselors for the same behaviors.

These inequities must be confronted. We need bold solutions that are focused on dismantling the systemic injustice in our education system that prevent students of color from succeeding. We therefore offer the following suggested recommendations for the DNC Platform Committee's consideration.

Distributing Funding More Equitably

Black, Latinx, and other students of color disproportionately attend schools in impoverished districts compared to their White counterparts. By funding predominantly White districts at higher levels than districts with predominantly students of color, we are investing in White children at the expense of Black, Latinx, and other students of color. We agree with the recommendation to support additional funding for underserved and under resourced districts by tripling Title I funding and incentivizing states to adopt progressive funding formulas that direct resources to the schools that need it most. We also agree that additional funding through Title III can help provide much needed support for English Learners such as dual language instruction, access to online learning, as well as rigorous coursework. However, we must do more to address the recession we are in, which has disproportionately impacted schools with high populations of students of color and English learners.

According to the Tax Policy Center, every state in the Union now faces a budget gap, with some states seeing revenue declines of up to 20% between now and fiscal year 2021 due to the COVID-19 pandemic.⁸ States are weighing cuts in basic services, which will lead to painful cuts in education. During the last recession, states made flat cuts to their K-12 aid, which ultimately tripled the funding disparity between wealthier and poorer districts.⁹ Flat funding cuts are essentially regressive for the nation's poorest school districts. These cuts disproportionately hurt low-income students, English learners, and students of color, who are already facing additional barriers to learning remotely. Approximately 1 in 3 students of color do not have high speed internet at home, compared to 1 in 5 White students, severely limiting their access to distance learning.¹⁰ Districts with the least resources will be hurt more from across-the-board cuts, as they rely more on state funds than wealthier districts that already receive more money in property taxes. Wealthier districts also can raise revenues to make up for loss of state and local funding. We must include maintenance of equity provisions in future funding decisions to ensure the students with highest needs receive the smallest cutbacks.

⁷ https://nces.ed.gov/programs/raceindicators/indicator_RED.asp

⁸ <https://www.taxpolicycenter.org/taxvox/covid-19-pandemic-could-slash-2020-21-state-revenues-200-billion>

⁹ <https://muse.jhu.edu/article/688011>

¹⁰ <https://nul.org/news/new-analysis-shows-students-color-more-likely-be-cut-online-learning>



Preserving Civil Rights Data Collection

Civil rights organizations joined with Congressional Democrats during the last Elementary and Secondary Education Act (ESEA) reauthorization in support of academic assessments and accountability for results based on multiple measures under the Every Student Succeeds Act (ESSA), which requires annual, statewide testing for particular grades in reading and math, as well as science. From a civil rights perspective, the use of standardized tests for accountability has helped reveal longstanding racial disparities in academic opportunity. In addition, having objective data has helped inform decision making to target funding, resources, and interventions to the schools and students who need it the most.

As such, we are concerned about the sweeping statement critical of “high-stakes” testing on page 25 of the Biden-Sanders Unity Taskforce document and page 59 of the July 21 draft of the DNC Platform, which appears to propose eliminating annual standardized assessments. We are particularly troubled by the recommendation on page 83 of the Biden-Sanders Unity Taskforce document to develop alternative assessments that would eliminate statewide summative assessments for all students annually in grades 3-8, undermining our ability to gauge performance at every school and decimating analysis of opportunity gaps between students from historically disadvantaged groups and their more privileged peers. Particularly at this moment in history, when our country is waking up to the fact that Black Lives Matter, we fear that this policy will bring us back to the days when the performance of students of color was inconsequential to a school’s overall performance, once again denying our children the education they deserve.

The changes both documents call for have largely been addressed ESSA, which required school systems to audit their assessments systems and eliminate the use of unnecessary tests. It also created significant changes in school accountability by requiring multiple measures of performance outside of academic assessments, including an additional indicator of school quality and student success in an effort to eliminate the high-stakes nature placed on standardized tests. These multiple measures allow school districts to take into account a variety of criteria that factor into a well-rounded education, such as access to AP/IB, career and technical education, dual enrollment programs, and school climate measures. Congress and our next President must preserve and, where necessary, strengthen these vital components of current federal education law.

With that being said, we offer the following red-line edits to the Biden-Sanders Unity Taskforce document section labeled, “High Stakes Testing”:

- Eliminate high-stakes **placed on** standardized tests, **which** unfairly **punish schools and** label students. Information from high quality assessment systems should be used to identify where students and schools need extra support and resources, rather than using high-stakes tests to fire teachers; close schools; and implement scripted curricula, rote learning, and a loss of electives. *(NOTE: It would be helpful for the Platform to clarify that tests are not being eliminated. Rather, we are eliminating certain uses or “stakes” on those tests.)*
- Fund efforts to study and develop alternatives to current annual assessment systems that still provide information about how well schools are serving **individual students and** groups of students, such as gradespan testing and sampling like the National Assessment of Educational Progress exams and the approach used in OECD countries. *(NOTE: The Unity Taskforce’s bullets focus on school-level information. This is important; however, our current assessment system is designed to provide families with information about the performance of their individual student. It is critical for families to have this information. If assessments are administered solely via sampling, parents will lose information about whether their children are performing on grade level.)*



- Provide families with clear, accessible, consistent information about their students' academic progress and whether their student is on-track to succeed in postsecondary learning and the workforce.
- Provide communities with annual, comparable data on student performance across schools and districts that is disaggregated by race and use this data to provide additional support to students and schools when needed.

We also offer the following red-line edits to the July 21 draft of the DNC Party Platform:

The evidence from nearly two decades of education reforms that hinge on standardized test scores shows clearly that high-stakes testing has not led to enough improvement in outcomes for students or for schools, and can lead to discrimination against students, particularly students with disabilities, students of color, low-income students, and English language learners. Democrats will work to end the use of such high-stakes placed on standardized tests and encourage states to develop reliable, continuous, evidence-based approaches to student assessment that rely on multiple and holistic measures. ~~Those measures~~ Assessments will provide families with clear, accessible, consistent information about how well schools are serving individual students¹¹ and groups of students, while better representing student achievement. ~~They~~ Students, families and schools will be supported by data collection and analysis disaggregated by race, gender, disability status, and other important variables, to identify and address disparities in educational equity, access, and outcomes.

Promoting Teacher Diversity

We cannot overlook the role that implicit bias plays in our nation's schools if we are truly to fight against systemic racism in education. The Biden-Sanders Unity Taskforce fails to acknowledge that while over half of our nation's public-school students are students of color, nearly 80 percent of our teacher workforce is White, and about three quarters of our teachers are women.¹² The largest demographic mismatch exists between Latinx students and teachers—over a quarter of students are Latinx compared to only 9 percent of teachers. It is vital that our children have role models and leaders in their lives and classrooms who reflect their racial, cultural, or linguistic background from an early age. For low-income Black students, for instance, having just one Black teacher in elementary school significantly increases the chances that they graduate high school and consider attending college. For Black boys from low-income homes, one Black teacher decreases the risk of dropping out by nearly 40 percent.¹³ We must be intentional about promoting teacher diversity when creating programs, policies, and incentives around teacher preparation, recruitment, training, retention, evaluation, and promotion.

¹¹ Our current assessment system is designed to provide families with information about the performance of their individual student. It is critical for families to have this information. If assessments are administered solely via sampling, parents will lose information about whether their children are performing on grade level.

¹² https://nces.ed.gov/programs/coe/indicator_clr.asp

¹³ https://www.google.com/url?q=https://www.usnews.com/news/education-news/articles/2018-11-23/black-teachers-improve-outcomes-for-black-students&sa=D&ust=1594992914391000&usg=AFQjCNFcS4_ss1g-54ebUCY6PQQGif4nKA



To create a high-quality teaching workforce that is more culturally responsive to the needs of Black and Latinx students, we recommend that the next Administration and Congress:

- Maintain and improve management of the Public Service Loan Forgiveness Program. This program serving low-wage earners would eliminate the remaining student loan debt balance of teachers working in the public sector after 10 years of repayment.¹⁴
- Collect data disaggregated by race/ethnicity and other demographics on retention rates, completion rates, and eventual entry into the teaching profession for educator preparation programs, to help the public understand which programs are most effective for teachers of color and to best help meet teacher diversity goals.
- Include mandatory funding for educator preparation programs at HBCUs, HSIs, and other Minority Serving Institutions (MSIs) that graduate a large number of Black and Latinx students and teachers, and continue to use grants that encourage and support collaboration between two- and four-year colleges to promote successful transfer and completion. Increasing support for Educator Preparation Programs at MSIs will assist students of color complete their degree and prepare them for working in challenging schools with high turnover rates.¹⁵
- Increase investment in Teacher Quality Partnership Grants (TQP) and other grants that incentivize partnerships between K-12 and higher education that articulate a pathway for prospective teachers of color and support them along the way. These P-20 partnerships between K-12 and teacher preparation programs should use early recruitment initiatives, intensive mentoring, support with academic preparation, and navigation of university structures for first generation students that will help prospective teachers complete their program and enter the teacher workforce.¹⁶
- Investing in Grow Your Own (GYO) Programs that focus on recruiting and preparing a diverse set of educators from local communities who are likely to stay and teach in those communities.

Breaking the School to Prison Pipeline

Excessive policing against communities of color all too often begins at school, a fact the Biden-Sanders Unity Task Force fails to adequately mention in its document. We believe the DNC Platform must not overlook nor underestimate this link nor its implications on the future social and economic well-being of Black, Latinx, and other students of color. We also believe the DNC Party Platform must acknowledge the role of resource inequities, implicit bias in the classroom, and militarization of schools in exacerbating the school to prison pipeline.

Research shows that Black and Latinx children are disciplined at higher rates, and in much harsher and more punitive ways than their White peers. In the 2015-2016 school year, Black boys and girls made up about 8 percent of the student population each, but a stunning 25 percent and 14 percent of suspensions, respectively.¹⁷ In addition to suspensions, Black students accounted for 31 percent of arrests that school

¹⁴http://publications.unidosus.org/bitstream/handle/123456789/1954/unidosus_highereducationact_teacherdiversification.pdf?sequence=8&isAllowed=y

¹⁵http://publications.unidosus.org/bitstream/handle/123456789/1954/unidosus_highereducationact_teacherdiversification.pdf?sequence=8&isAllowed=y

¹⁶ <https://www.newamerica.org/education-policy/reports/paving-way-latinx-teachers/policy-recommendations-to-strengthen-pathways-into-teaching>

¹⁷ <https://www.edweek.org/ew/articles/2018/05/02/black-students-bear-uneven-brunt-of-discipline.html>



year¹⁸ and Latinx students were arrested at a rate 1.3 times that of White students (11 per 10,000 compared to 9 per 10,000).¹⁹ Black and Latino boys with disabilities made up 3 percent of students but were 12 percent of school arrests.²⁰ According to the NAACP Legal Defense and Education Fund report, “Locked Out of the Classroom: How Implicit Bias Contributes to Disparities in School Discipline,” the impact of these policies in limiting educational opportunities for students of color is glaring. The report finds that “a child who is expelled or suspended is more than twice as likely to be arrested within the same month as compared to a child who had not been previously suspended during the same month. Individuals incarcerated as juveniles are 39 percentage points less likely to graduate from high school compared to other public school students from the same neighborhood.”²¹ According to findings from the ACLU “when there are no other support staff to address behavioral problems, some teachers request help from law enforcement. This results in an increased criminalization of school children. We found that schools with police reported 3.5 times as many arrests as schools without police. As a result, students with disabilities and students of color are frequently sent into the criminal system.”²²

The current administration has worked to undermine Obama-era recommendations to address these issues, leaving students of color open to continued discrimination, loss of learning, and unnecessary negative interactions with police. We support the task force’s recommendations to reinstate the 2014 school discipline guidance and work with states and districts to develop and update local disciplinary reporting measures. In addition, we agree with the recommendations to provide schools with mental and social emotional support to students through school counselors, nurses, psychologists, and others. Furthermore, the DNC Platform must properly acknowledge the disparate racial impact of school discipline policies that are limiting the success of students of color.

Expanding Access and Affordability in Higher Education

The Biden-Sanders Unity Taskforce document fails to properly acknowledge the disparate impact that access and affordability have on the ability of students of color and first-generation college students to attend and earn a college degree.

The cost of college is viewed as the top reason many students decide not to pursue post-secondary education. Studies show that close to 40 percent of students turned down their first choice institutions because of cost.²³ Data also show that college costs are more of a burden for Black and Latinx families than they are for White families.²⁴ This is, in large part, due to centuries of policies that have helped White families build wealth at the expense of Black and Latinx families. According to one analysis, the median wealth of White families in 2016 was \$171,000, compared with \$17,100 for Black families and \$20,600 for Latinx families²⁵ — limiting the opportunities Black and Latino students have as they look at the increasing price tag of attending college, and forcing them to rely on student loans.

¹⁸https://www.washingtonpost.com/local/education/racial-disparities-in-school-discipline-are-growing-federal-data-shows/2018/04/24/67b5d2b8-47e4-11e8-827e-190efaf1f1ee_story.html

¹⁹https://www.aclu.org/sites/default/files/field_document/030419-acluschooldisciplinereport.pdf

²⁰https://www.aclu.org/sites/default/files/field_document/030419-acluschooldisciplinereport.pdf

²¹https://www.naacpldf.org/files/about-us/Bias_Reportv2017_30_11_FINAL.pdf

²²https://www.aclu.org/sites/default/files/field_document/030419-acluschooldisciplinereport.pdf

²³<https://www.insidehighered.com/news/2017/03/23/study-shows-how-price-sensitive-students-are-selecting-colleges>

²⁴<https://www.blackenterprise.com/black-families-bear-greatest-college-cost-burden/>

²⁵<https://www.pewresearch.org/fact-tank/2017/11/01/how-wealth-inequality-has-changed-in-the-u-s-since-the-great-recession-by-race-ethnicity-and-income/>



While millions of Americans have been forced to take on student debt as the price of a college degree, this burden is not distributed equitably across racial lines. Nearly 85 percent of Black bachelor's degree recipients carry student debt, compared with 69 percent of White bachelor's degree recipients.²⁶ The average White student loan borrower owes around \$30,000; the average Black borrower owes closer to \$34,000.²⁷ Furthermore, Black graduates' job prospects are mired by discriminatory pay and employment policies that significantly undervalue Black labor. As a result, White borrowers are able to pay down their education debt at a rate of 10 percent a year, compared with 4 percent for Black borrowers. Nearly 38 percent of all Black students who entered college in 2004 had defaulted on their student loans within 12 years, a rate more than three times higher than their White counterparts.²⁸

Latinx students also face barriers to accessing higher education. While the Latinx student population has seen the biggest increase in college enrollment rates, their degree attainment lags their peers—in 2017, 42 percent of White people aged 25-29 had a bachelor's degree compared to 19 percent of Latinx counterparts²⁹—either because they lack the necessary academic or culturally-relevant support or because financial barriers get in the way. At a time when the Latinx population in the U.S. is fast growing, research from The Education Trust shows Latinx students in the vast majority of states are underrepresented at public colleges and universities, especially at community and technical colleges. They are also underrepresented among earners of associate and bachelor degrees.³⁰ College costs are one of the biggest hurdles for Latinx individuals, who have eight times less wealth, on average, than their White counterparts.³¹ Almost half (47 percent) of Latinx undergraduates received a Pell Grant compared to 32 percent of White undergraduates.

If this picture weren't bleak enough, for-profit institutions target Black and Latinx students—taking their money and their time and not delivering employment or economic opportunity upon graduation. Black and Latinx students make up 34 percent of all postsecondary enrollments but 51 percent of students at for-profit institutions.³²

The DNC Platform cannot address higher education accessibility and affordability from a color-blind standpoint. Leaders must be intentional about targeting federal dollars to help students of color, low-income students, and first-generation college students get to and through post-secondary education, and to provide resources to institutions to address gaps in student outcomes by race, ethnicity, and income.

²⁶ <https://www.cnbc.com/2019/07/27/how-the-student-debt-crisis-has-hit-black-students-especially-hard.html>

²⁷ *Ibid*

²⁸ *Ibid*

²⁹ <https://www.newamerica.org/education-policy/reports/paving-way-latinx-teachers/barriers-along-the-pathway-into-teaching>

³⁰ <https://edtrust.org/resource/broken-mirrors-latino-representation-english/>

³¹ <https://www.americanprogress.org/issues/race/reports/2018/02/21/447051/systematic-inequality/>

³² <http://civilrightsdocs.info/pdf/education/Gainful-Employment-Brief-Final.pdf>



In closing, we share the DNC Platform Committee's commitment to address racial inequality in America and we thank the Committee in advance for considering our recommendations to appropriately recognize and adequately address long-standing systemic racism in our public education system. Together we can ensure all children have the resources and the opportunities to succeed regardless of their race, ethnicity, income or zip code.

Sincerely,

A handwritten signature in green ink that reads "Marc H. Morial".

Marc H. Morial
President and CEO
National Urban League

A handwritten signature in black ink that reads "Janet Murguía".

Janet Murguía
President and CEO
UnidosUS

A handwritten signature in black ink that reads "Sindy M. Benavides".

Sindy M. Benavides
Chief Executive Officer
LULAC

A handwritten signature in black ink that reads "Rev. Al Sharpton".

Rev. Al Sharpton
Founder and President
National Action Network