

December 17, 2024

Mary Wall, Deputy Assistant Secretary P-12 Office of Planning, Evaluation and Policy Development U.S. Department of Education 400 Maryland Avenue SW Washington, DC 20202

Dear Deputy Assistant Secretary Wall:

On behalf of the National Association of Secondary School Principals (NASSP) National Student Council (NSC), we appreciate the opportunity to provide recommendations on President Biden's Executive Order on Combating Emerging Firearms Threats and Improving School-Based Active-Shooter Drills.

The NSC comprises over 30 middle and high school level students nationwide and is humbled to represent over a million students, 30,000 school leaders, and 16,000 advisors across the country through various programs. This school year, the Council's top priority is school safety and student wellness through advocacy, education, and community engagement. Last month, NSC was honored to speak and represent on behalf of student voice at the U.S. Department of Education's Listening Sessions #1, #2, and #3 - Executive Order on Improving School-Based Active Shooter Drills.

On December 11th, 2024, senior officials from the Department joined our meeting to hear the student leader's feedback. The experience was incredibly insightful and moving as students shared "on the ground" stories, asked questions, provided recommendations, and learned more about educational policy and advocacy from the Department. The Council extends its gratitude for being included in such a critical and personal conversation. The NSC offers the following recommendations:

Active Shooter Drills

- Make opportunities available for students and educators to provide active and often feedback on drill execution, highlighting what went well, areas for improvement, and general questions and concerns.
- Students must be specifically trained to report alarming behavior from peers to trusted adults and hotlines, including threatening social media posts, drastic changes in behavior, aggression, or violent tendencies.
- Continually looking at the most current data available to highlight best practices for drills, including practices limiting the use of hyper-realistic props, sound effects, and unannounced drills.
- 'Safe language' education for teachers and school leaders to use developmentally appropriate terms during drills, avoiding harmful or insensitive language.
- Informing school leaders about the diverse range of drill programs designed to fit a variety of school needs. Proactively providing needed accommodations to students with disabilities during active shooter drills.



- Speaking to students about drill protocol in different settings throughout campus. Practice drills multiple times per school year.
- Collaboration with local law enforcement and/or school resource officers (SROs) will help schools and students understand their role in the event of a school safety incident.
- Ensuring all teachers, including temporary teachers are properly trained by a trained law enforcement professional, including active shooter preparedness programs, courses, resources, training pre-incident indicators, characteristics, and development of the emergency action plan as similarly provided by the Cybersecurity and Infrastructure Security Agency (CISA.gov).
- Trauma-informed practices are necessary for students who have personal experience with gun violence or safety threats to reduce additional emotional stress.

Mental Health

- Further funding for student mental health support through outlets such as Title IV and expanded access to trained professionals such as counselors, psychologists, and school social workers.
- Sustaining conversations post-drill with students will help create an open environment for students to ask questions and verbally process events if needed.
- Prioritizing mental health resources for students after school safety threats and other incidents.
- Increased awareness of school mental health professionals and other supports available on campus for students.
- Student-led wellness clubs and other teen-led groups can help improve school culture and reinforce 'safe spaces' in secondary schools. Student groups can also help reduce stigma and encourage active help-seeking.
- Mental health risk assessments, peer-to-peer training initiatives, and quality resources allocated to students are needed to effectively practice school and student safety.
- In collaboration with law enforcement, to have required student and parent involvement to understand the consequences of students making threats which rise to the level of a felony and/or incarceration.

Safe Firearm Storage

- School districts receiving mental health or suicide prevention funding should conduct yearly instruction on firearm safety, firearm storage safety, and suicide prevention for 6-12 grade students.
- Age-appropriate education on secure storage of firearms (firearm safes, trigger locks, and cable locks), information on the risks associated with incorrect firearm use with suicide, unintentional injury, and mass shooting, and steps to take if students encounter an improperly stored firearm.



• Required parental involvement and resources to supplement classroom instruction and inform guardians about home and vehicle gun safety will help ensure that firearms stay out of the hands of children.

On behalf of the National Student Council, thank you again for your commitment to keeping our schools safe. In 2024, there have been 323 shootings at K-12 schools in the United States. Continual change is necessary to save lives. We are hopeful that the future of this Executive Order will bring increased community safety, education, and support for students, educators, school leaders, and families. We appreciate your dedication to action and student voice through these discussions.

If you need to contact NASSP or NSC, please contact Director, External Relations, Jen Silva at silvaj@nassp.org or 904-575-0447.

Thank you for your attention to this matter.

Sincerely, Anjali Verma

Anjali Verma National Student Council President

cc: Lauren Mendoza, U.S. Department of Education, Deputy Assistant Secretary, State and Local Outreach Haleemat Adekoya, U.S. Department of Education, Public Affairs Specialist Hikma Sherka, U.S. Department of Education, Youth Engagement Coordinator The White House Office of Gun Violence Prevention