

# ***The National Coalition*** ***on*** ***School Diversity***

July 30, 2021

Dr. Miguel Cardona  
Secretary, U.S. Department of Education  
400 Maryland Avenue SW  
Washington, DC 20202

Re: Proposed Priorities and Definitions – Secretary’s Supplemental Priorities and Definitions for Discretionary Grant Programs, 86 Fed. Reg. 34664 (June 30, 2021)

Dear Secretary Cardona and colleagues,

Thank you for the opportunity to comment on the Secretary’s priorities for discretionary grant programs. Our comments focus on the importance of reducing the racial and economic isolation of PK-12 students—using a holistic approach to integration—in service of educational equity and a well-functioning multi-racial democracy.

We appreciate the Department’s inclusion of school diversity measures as one of thirteen approaches to “Promoting Equity” (Proposed Priority 2). Its placement as the last of the listed approaches, however, suggests that it may not be treated with the urgency and weight it deserves.<sup>1</sup> Our coalition’s experience over the past several decades<sup>2</sup> suggests that subordinating school integration to broader racial equity goals inevitably feeds a vicious cycle of prioritizing urgent, but shorter-term, “separate-but-equal” approaches at the expense of addressing the systemic, long-term harms of segregation. As such, **we believe that school diversity should be included as a separate and free-standing priority in the Secretary’s final priorities.**

A majority of the Supreme Court has recognized school diversity and the reduction of racial isolation “compelling government interests,”<sup>3</sup> but recent research demonstrates that our nation’s schools still struggle to address racial and economic segregation and its many harms. The norm in this country is to place low-income children and children of color in separate schools, despite the well-documented benefits of integration for students of all racial and socioeconomic backgrounds. It is obviously crucially important to ensure that high-poverty schools receive intensive resources and improvements in all the ways articulated by the Department in Proposed Priority 2. However, we believe it is equally important to address the long-term goals of addressing racial isolation and concentrated poverty, if our goal is to achieve systemic educational equity.<sup>4</sup>

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<sup>1</sup> We believe that the ordering and grouping of the Secretary’s priorities matters, and that the Department should send a clear message that achieving systemic educational equity, in part by dismantling separate and unequal education, is a goal. The Department’s commitment to school integration should be given at least co-equal priority, at the same time as we continue to address the needs of high-poverty, racially segregated schools.

<sup>2</sup> In fact, NCSD’s founding a single-issue coalition in 2009 was based on two insights: 1) the research base on school integration is robust, and has grown stronger over time, but is rarely used to inform policymaking; and 2) although many organizations care about issues of segregation/integration, concrete asks related to integration rarely became core organizational priorities, thus the issue of integration was being lost in the policy conversation.

<sup>3</sup> *Parents Involved in Community Schools v. Seattle School District 1*, 551 U.S. 701 (2007).

<sup>4</sup> We note, too, that Proposed Priority 2 includes a sub-priority to “Creat[e] more equitable and adequate approaches to school funding.” We believe that your agency can play an important role in helping people understand and address the interconnections between segregation and inequitable funding at all levels (within districts, between districts/metros, and at state levels). As part of that, we reiterate our previous recommendation that your agency “Convene experts to identify concrete ways to successfully

In addition to establishing school diversity as a standalone priority, the Department should:

- In its efforts to support a diverse educator workforce (Proposed Priority 3):
  - Take steps to ensure that segregation of teachers of color does not occur,<sup>5</sup> as students of all racial backgrounds benefit from teachers of color.
  - More explicitly define educator diversity, and consider adding the promotion of linguistic diversity as a part of this definition, given the need for more bilingual educators that can effectively serve Multilingual/English Learners.
- Include school diversity as a sub-priority in Proposed Priority 4 (social, emotional, and academic learning), based on the strong evidence that school integration enhances students' social and emotional development.<sup>6</sup>
- Include school diversity as a sub-priority in Proposed Priority 6 (cross-agency coordination), to echo the priority for cross-agency collaboration with housing and transportation authorities discussed in Proposed Priority 2, as one of the means of increasing racial and socioeconomic diversity.
- Add more explicit language on “school integration” and “desegregation” throughout the priorities document, in addition to the U.S. Supreme Court’s terminology – “school diversity” and “reduction of racial isolation.”

Finally, we note that the Obama Administration appropriately included “Promoting Diversity” as a freestanding priority in its final “Supplemental Priorities for Discretionary Grant Programs.”<sup>7</sup> The intent of this priority was “to focus on the racial and ethnic diversity of students in order to promote cross-racial understanding, break down racial stereotypes, and prepare students for an increasingly diverse workforce and society.”<sup>8</sup> The urgency of these particular goals is extremely high, and the nation needs your agency’s leadership.

Sincerely,

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reform Title I to remove disincentives for integration without undermining Title I's equity goals.” See National Coalition on School Diversity, [School Integration Priorities for a Biden/Harris Administration](#) (2021) at 5.

<sup>5</sup> Teachers of color are often hired in school districts that are classified as high-need and serve predominantly student of color. See, e.g. Esther Quintero Kinga, Wysienska-Di Carlo, & Matthew Di Carlo, Albert Shanker Institute, *Teacher Segregation in Los Angeles and New York City* (2016), which can be accessed via <https://www.shankerinstitute.org/resource/teachersegregation>; Elaine Gross & Amy Stuart Wells, [LI Needs More Minority Schoolteachers](#), *Newsday*, July 19, 2021 (a recent data analysis by ERASE Racism showed that 11 intensely segregated Long Island school districts—out of 125 school districts in total—employ 45 percent of the area's teachers of color).

<sup>6</sup> See research summarized in NCSd Research Brief No. 13, [“Re-Weaving the Social Fabric through Integrated Schools: How Intergroup Contact Prepares Youth to Thrive in a Multiracial Society”](#) by Linda R. Tropp and Suchi Saxena (2018).

<sup>7</sup> 75 Fed. Reg. 78486 (December 15, 2010), <https://www.govinfo.gov/content/pkg/FR-2010-12-15/pdf/2010-31189.pdf>.

<sup>8</sup> *Id.* at 78500.

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