



To: The Harris and Trump Presidential Campaigns

From: EdTrust

Subject: Opportunities to Advance Education Equity in 2025 and Beyond

Date: September 30, 2024

Purpose

EdTrust is a national nonprofit organization that is committed to advancing policies and practices to dismantle the racial and economic barriers embedded in the American education system. Through our research and advocacy, EdTrust improves equity in education from preschool through college, engages diverse communities dedicated to education equity and justice, and increases political and public will to build an education system where students thrive.

Public classrooms and colleges in America today are reflective of the growing diversity across the country, yet practice and policy hasn't adapted to adequately meet students' needs. The pandemic placed a national spotlight on the issues that students of color and students from low-income backgrounds had already been facing for years. These needs are no less dire today than they were in the early days of the pandemic. Our education system should respond to these issues by giving every student the tools and resources to pursue the lives of their choosing and create schools that deliver the education students need to become conscientious Americans who are equipped to navigate the future in an increasingly global economy.

This memo outlines federal legislative and executive policy recommendations made by EdTrust to the next presidential administration. The policies described herein are not exhaustive but are designed to communicate an overview of the issue areas that require immediate attention and recommendations we see as necessary for all students to succeed. It is our hope that both presidential campaigns will view EdTrust as a resource and that the next presidential administration will work to implement equitable policies that increase educational opportunity for our nation's students of color and students from low-income backgrounds at the early childhood, elementary, secondary, and post-secondary levels.

P-12 Policy Priorities and Recommendations

Over much of the past four years, states and school districts have been utilizing much-needed pandemic relief funding that Congress provided to address the immediate needs of students, educators, and staff, while also prioritizing the changes needed to address the disproportionate impacts of COVID-19 school closures on traditionally underserved students: Black, Latino, and Native students; students from low-income backgrounds; multilingual learners; students with disabilities; and students experiencing homelessness. For example, Black, Latino, and Native students had [less access](#) to devices and home internet service during the transition to, and throughout, remote learning. Additionally, students of color [more frequently](#) were being taught by teachers

with less support and expertise in adapting teaching practices to virtual learning, vetting and deploying online learning tools, and identifying and meeting students' varying needs. Students of color also more frequently had parents and caregivers who were "essential workers" and/or those with nontraditional work hours that [did not allow for](#) telework or time to assist with schoolwork and had [more](#) social and emotional stressors than their white counterparts. This has contributed to disproportionate amounts of students of color experiencing [unfinished learning](#), or learning loss, and while research has shown high-impact tutoring and extended learning time are effective interventions in combating these problems, more needs to be done to sustain those interventions. These problems require a continual response from the federal government beyond the funds provided in earlier COVID-19 relief packages, especially given the upcoming expiration of those funds. The equitable approach taken in dispensing pandemic relief funds should be championed by the federal government in several different areas, including advising states on how to best fund their education systems, creating and administering assessments, preparing students for college and career, recruiting and retaining teachers of color, supporting early childhood education, and creating and maintaining access to safe, equitable, and positive learning environments.

In contrast to the actions that millions of leaders, administrators, educators, staff, parents, and students are taking to address the dire problems outlined above within our nation's education system, there are those who are pushing for book bans, championing "parents' rights," and opposing diversity, equity, and inclusion (DEI) initiatives. This represents a troubling retreat from the principles of open-mindedness and inclusivity that are foundational to a vibrant democracy. By banning books, these movements stifle intellectual freedom and deny students the opportunity to engage with diverse perspectives and critical thinking. Additionally, the focus on removing books obfuscates the reality that learning resources [currently included in curricula](#) are not representative of the diversity of the student body. The rhetoric around "parents' rights" often serves as a cover for imposing a narrow set of values on the entire education system, disregarding the pluralistic nature of American society, and specifically devaluing and disregarding the experiences of the tens of millions of students and families of color. Furthermore, opposition to DEI efforts undermines the progress made toward creating a more just and equitable society, perpetuates systemic inequalities, and marginalizes already vulnerable communities. Such movements not only hinder educational and social progress but also threaten the very fabric of a diverse and democratic nation. We oppose these efforts in all their forms.

On the contrary, many families and educators are united in what they want and need from schools: authentic engagement and equity. Parents want honest conversations about their children's academic performance and want to focus on students' social and emotional well-being. For example, extensive research demonstrates that when families are engaged in their children's academic growth and development, students are more likely to succeed academically. Beyond the clear benefits to students' social, emotional, and academic development, establishing robust student, family, and community engagement also greatly benefits educators, districts, and communities. For example, maintaining strong relationships between educators and families helps create a positive and inclusive school climate that helps to improve educator retention rates and decrease discriminatory discipline practices. There is much more to do to support family engagement and the educators who are charged with preparing our nation's students for an increasingly diverse future.

In 2025, leaders in Washington, D.C. must take the necessary steps to invest substantially in our nation's education system, and in doing so, advance education equity across the following areas:

Funding

Because of systemic racial and economic inequities, districts serving large populations of students of color and students from low-income backgrounds receive far less funding than those serving white and more affluent students. Despite inequitable funding formulas being declared unlawful and the work of dedicated advocates who have spent decades calling attention to this problem, too many states continue this unfair practice. [Across the country](#), school districts with the most Black, Latino, and Native students receive [roughly \\$2,700, or 16%, less per student](#) in state and local funding than those serving mostly white students, and states and districts spend approximately \$800 less per pupil on students educated in our nation's highest poverty districts than on those educated in the lowest poverty districts. While money alone will not solve the deeply embedded systemic inequities our students face, it makes a difference. [Research shows](#) that increased school spending leads to increases in educational attainment, higher wages, and a reduction in adult poverty, especially for students from low-income backgrounds.

Additionally, any future large-scale investments and policy changes should protect our nation's most vulnerable students and educators from cuts by including strengthened provisions to ensure [that states uphold their responsibilities](#) to fund public education and to ensure that the highest need districts and schools are funded equitably. This could include closing the comparability loophole in Title I and ensuring federal funds supplement, not supplant, state and local funds with meaningful compliance calculations and procedures.

Finally, EdTrust opposes the use of federal funds to increase the use of school vouchers, which pose significant problems that can lead to inequitable outcomes. One major issue is that vouchers divert public funds from already underfunded public schools to private institutions, which often have selective admission processes and are not held to the same accountability standards. This can further disadvantage students from low-income families, students of color, rural students, and students with disabilities, as they are less likely to access or benefit from private school options. Additionally, vouchers often do not cover the full cost of private schooling, leaving families unable to make up the difference. This creates a system where public funds benefit wealthier families — exacerbating existing inequalities and weakening the public education system meant to serve all students.

EdTrust recommends the following actions be taken by Congress and the next administration to address this issue:

LEGISLATIVE

Congress should:

- Support and incentivize states to [increase equity](#) in their school funding systems. This includes setting aside funding to help establish voluntary state-level School Funding Equity Commissions; directing more funding to districts with higher student need or low-property wealth and districts serving high percentages of students of color; monitoring that dollars are used well to improve student learning experiences and outcomes; being transparent about the funding system's design; and ensuring districts are receiving the funds at the level they are entitled to under funding formulas.
- Substantially increase federal funding to support high-need schools by increasing funding for Title I of the Every Student Succeeds Act (ESSA).
- Substantially increase federal funding for the Individuals with Disabilities Education Act (IDEA) to ensure that all schools have the resources needed to provide free and appropriate public education to students with disabilities.

- Substantially increase federal funding for Title III of ESSA to provide schools with the resources they need to ensure multilingual learners attain proficiency and meet state academic standards.
- Reintroduce and pass the [Strength in Diversity Act](#) to fund grants to districts to implement strategies to address the effects of racial isolation or concentrated poverty.

EXECUTIVE

The next administration should:

- Leverage existing data collections to improve the collection and reporting of school-level per-pupil spending data. This could include regulating or providing technical assistance to states to help them meet ESSA's school-level fiscal transparency requirement. It [should also include](#) timely reporting of existing data and providing technical assistance to state education agencies (SEAs) support the expansion of the NCES school-level finance survey alongside the ESSA requirement.
- Promulgate guidance that supports states and schools legally pursuing strategies to close racial school funding gaps.

Transparency and Support for Struggling Schools

Not long ago, information on how schools were serving students from low-income backgrounds, students of color, multilingual learners, and students with disabilities was difficult to discern, hidden behind averages. Parents had no way of knowing how well their schools were serving their children, equity advocates had no way of knowing whether students were getting the necessary learning opportunities and resources, employers had no way of ensuring graduates they hired would be equipped with the right skills for the job, and states had no real way of identifying schools that needed additional support and resources to improve.

In 2015, ESSA was passed by Congress and signed into law. This legislation challenged states to refine their accountability systems to provide the right combination of pressure and support for school improvement. The law leaves many key decisions up to states — decisions about what to measure, how to communicate how schools are doing on those measures, how to identify schools that need to take action to improve for any group of students, what to do to support school improvement efforts, and what to do if schools don't improve — balancing the federal and state role in the education of our nation's children.

Yet mounting evidence suggests that states are failing to harness this flexibility to center the needs of traditionally underserved student groups, with stronger oversight from the federal government needed to ensure compliance with provisions designed to support school improvement. For instance, EdTrust's [2024 review](#) of state ESSA plans found that only about half of states are leveraging the school identification process to ensure schools with disparities in student outcomes are getting access to needed state and federal supports, and no state has set criteria for identified schools to exit status in ways that ensure schools are making meaningful and sustainable progress toward improved student outcomes. Similarly, [a January 2024 GAO report](#) found that less than half of school improvement plans in schools designated for Comprehensive Support and Improvement (CSI) incorporate all three required elements: a needs assessment, identification of resource inequities, and selection of evidence-based improvement strategies.

By requiring states and districts to monitor and address inequities, ESSA aims to ensure that all students, regardless of background or socioeconomic status, have access to the tools and opportunities necessary for success. The resource equity provision in the law and others are designed to help close achievement gaps, support the development of high-quality learning environments, and promote long-term educational improvement, especially for traditionally underserved groups. Equitable resource distribution is essential for fostering a more inclusive and effective education system. There is still more that the federal government can do to ensure that traditionally underserved populations are getting the support and resources they need to succeed.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Conduct oversight to ensure that ESSA's civil rights and school improvement requirements are implemented and executed as written.
- Provide funding for state innovations in assessment systems and ensure these efforts require collaboration from diverse communities, families, and students to improve assessments. These efforts must focus on ensuring content is inclusive for all students and assessment results are used to drive resources and support to the students and schools with the most need by providing leaders, educators, students, and families with timely, actionable data.

EXECUTIVE

The next administration should:

- Take regulatory action, issue guidance, and provide technical assistance concerning school accountability, school improvement, and state and local report cards under ESSA that emphasizes the use of multiple measures for each group of students, requires states to pair assessment and accountability systems with real action to address the systemic inequities these measures bring to light, and ensures greater transparency for parents, families, and communities.

College and Career Readiness

There are many pathways to a successful career, and every student should have access to postsecondary education and career opportunities to allow them to pursue degrees and certificates that align with their interests and career aspirations. However, because of quickly-changing labor demands, longstanding barriers to accessing high-quality opportunities, and the many demands on educators, counselors, staff, and school leaders, choosing and navigating a pathway that will enable them to have a successful future can be hard for many students — particularly students of color, first-generation students, and students from low-income backgrounds — and their families. And while many well-resourced school districts offer supports for students, including high-quality advising and college and career exploration opportunities, many students — particularly students in underfunded school districts, students from low-income backgrounds, and students of color — lack access to the same level of support and, as a result, are unaware of all their options.

One proven avenue for students to gain confidence and readiness for college and careers is through advanced coursework opportunities. When students are given access to advanced coursework, they work harder, are more engaged in school, have fewer absences and suspensions, and higher graduation rates. Significant barriers exist, however, that prevent underserved students, particularly Black and Latino students, from accessing these courses. For example, EdTrust’s 2020 report, [“Inequities in Advanced Coursework: What’s Driving Them and What Leaders Can Do”](#) shows how Black and Latino students are systemically locked out of advanced coursework opportunities in elementary, middle, and high school. As this report details, the underrepresentation of Black and Latino students in advanced courses is largely due to racially diverse schools not enrolling as many students in advanced courses as majority white schools, as well as schools, particularly those that are racially diverse, denying these students access to these courses. Similarly, EdTrust’s 2022 report, [“Shut Out: Why Black and Latino Students are Under-Enrolled in AP STEM Courses,”](#) found that despite many Black and Latino students reporting that they enjoy STEM courses and that they aspire to attend college, very few enroll in advanced placement STEM courses due to a variety of systemic barriers, including funding inequities, racialized tracking, and educator bias and deficit mindsets.

Despite these barriers, as both reports detail, Black and Latino students are successful in advanced courses when given the opportunity. These students are more likely to take an advanced course when they aspire to go to college, and students who aspire to go to college are more likely to take an advanced course when they feel like they belong in the course and are given adequate enrollment information. These barriers are not insurmountable, and fortunately, several states have found a promising policy lever to increase access to advanced coursework: automatically enrolling students in advanced classes if they show readiness through an end-of-year exam or another measure.

In 2024, EdTrust published a [toolkit](#) to amplify the policy and offer tips and resources for other states and districts to extend access and get more students college and career ready. Furthermore, in addition to adopting and implementing enrollment policies that increase the number of underserved students accessing advanced coursework, state, district, and school leaders can also work to address these barriers by not only providing educators with the training and professional development necessary to address biases and focus on students’ assets and strengths, but also by investing in evidence-based interventions that create a safe, inclusive, and welcoming school environment.

Most recently, EdTrust published, in conjunction with All4Ed, [“A Vision for Equitable Pathways: Enhancing Support and Innovation in College and Career Counseling”](#) in September 2024. Pathways are essential for helping students move from P-12 to higher education and career more seamlessly, allowing them to achieve degrees and certificates that align with their interests and career aspirations. However, there are several barriers to equitable pathways opportunities, especially for some discrete groups, including rural students, students with disabilities, and multilingual learners. The report calls for transforming pathways counseling from a privilege for some to a right for all, ensuring every student can pursue their dreams and contribute their talents to society. By embracing a comprehensive, multi-pronged approach, we can create a future in which young people, especially students of color and students from low-income backgrounds are empowered with the resources, opportunities, and guidance to forge their postsecondary path successfully.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- [Support and incentivize states to](#) advance equity in access to, and success in, advanced coursework, including using data to identify barriers to enrollment, setting clear and measurable goals, investing in the expansion of advanced coursework opportunities, requiring and supporting districts to take similar action, and especially supporting access for Black students, Latino students, and students from low-income backgrounds. One important step would be to reintroduce and pass the [Advanced Coursework Equity Act](#), sponsored by Senator Cory Booker and Representative Joaquin Castro, which would establish a grant program for states and districts to address equity gaps through instituting equitable enrollment mechanisms, increasing enrollment in advanced courses, covering the costs of advanced coursework exams and materials for students from low-income backgrounds, and preparing and supporting educators to teach these courses, all while setting clear and measurable public achievement goals.
- Increase ESSA Title IV funding to allow for more students of color and students from low-income backgrounds to access and receive credit for advanced courses, alongside hiring additional school counselors, which enable students to access college and career counseling and mental health supports.
- Consider new funding streams to allow for a standardized definition of pathways counseling and train more college and career pathways counselors nationwide, as well as empowering states to develop resources for schools to employ when counseling their students.

EXECUTIVE

The next administration should:

- Disseminate guidance on equitable strategies for enrolling more students of color and students from low-income backgrounds in advanced coursework opportunities, and guidance on ensuring undocumented students are not denied opportunities to participate in dual enrollment programs.
- Ensure that the Civil Rights Data Collection contains data elements pertaining to AP/IB course taking, exam success rates and credit recovery participation, in addition to adding data elements to collect career and technical education (CTE) enrollment and credential earning by race, ethnicity, multilingual learners, disability status, and gender.
- Leverage federal college access programs such as TRIO and GEAR UP to increase availability and uptake of advanced coursework opportunities among students of color and students from low-income backgrounds.
- Take the following actions to support student pathways, including using existing programs like the Education Innovation and Research program to support students' navigation of pathways; encourage data sharing and commission studies to more fully understand the outcomes for students who participate; develop a cross-agency task force to conduct ongoing oversight; and promote technical assistance and certification for pathways counselors.

Educator Equity and Diversity

Research shows that teachers are [the single greatest in-school factor](#) that influences student success. Students with the strongest teachers receive what amounts to months' worth of additional learning each year. In addition, all students benefit from a diverse teacher workforce, and the benefits of teacher diversity can be especially important for students of color, who [are less likely to be chronically absent or suspended from school](#) and [more likely to be recommended for gifted and talented programs, graduate high school, and consider college](#) when they have had a teacher of the same race or ethnicity.

Unfortunately, [more than 1 in 3 Black and Latino students](#) attend a school where they have no teachers of the same race or ethnicity. As of 2018, approximately [53% of public school students in grades K-12](#) are Black, Latino, Native, or Asian/Pacific Islander, and the numbers of students of color will continue to grow. Yet only [21% of teachers](#) are teachers of color. Even a larger percentage of white students attend a school without a single Black teacher and/or Latino teacher.

The role of historically Black colleges and universities (HBCUs), minority-serving institutions (MSIs), Hispanic-serving institutions (HSIs), and tribal colleges and universities (TCUs) in producing teachers of color to help serve that growing population of students of color cannot be overstated. HBCUs, TCUs, and MSIs, collectively, award only 11% of the nation's bachelor's degrees in education, [yet they produce](#) more than 50% of the bachelor's degrees earned in education by Latino and Native Hawaiian and Pacific Islander students. [HBCUs graduate approximately 50%](#) of the nation's Black teachers with bachelor's degrees. [HSIs prepare nearly half](#) of all Latino teachers, and along with other MSIs, constitute a vital pipeline to maintain diversity among our nation's teachers. There is also a growing need for bilingual teachers to help teach multilingual learners, which [comprise 10%](#) of all public school students. As of 2019, 31 states and the District of Columbia [reported having teacher shortages](#) in the areas of bilingual, dual language immersion, and English as a Second Language. Additional investments in successful programs are needed to continue to meet the demand of an increasingly diverse national student body.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- [Support and incentivize states to](#) establish clear goals at the state and district levels to increase access to strong and diverse educators; target resources to the districts and schools that struggle the most to provide students from low-income backgrounds and students of color with access to strong and diverse teachers; target resources to diversify the teaching workforce and to address multilingual teacher shortages; set high standards for how teachers are prepared and licensed to improve teaching quality for students in high-need schools and in underserved groups; and make educator quality and diversity data more visible and actionable.
- Increase funding for HBCUs, HSIs, TCUs, and other MSIs, as well as increase funding for the Higher Education Act (HEA) Title II-Part A to support state, local, and institutional efforts to recruit, retain, and support teachers and school leaders of color, including establishing pathways for teachers from community colleges into four-year programs and creating teacher training programs to respond to bilingual teacher shortages.

- Increase funding to the Augustus F. Hawkins Centers of Excellence Grant program. This program provides critical funding to HBCUs and MSIs to enable increased and enhanced clinical experience and increased financial aid to prospective teachers of color, who, as detailed above, face higher burdens in college access and affordability than their white peers.
- Improve HEA Title II data reporting requirements by passing legislation to include program completer data, licensure pass rates, placement rates, and alternative certification programs data, all of which should be disaggregated by race and ethnicity.

EXECUTIVE

The next administration should:

- Disseminate guidance on programming related to increasing the racial and linguistic diversity of the teacher workforce, including best practice guides on how to set up Grow Your Own programs (GYO), Registered Teacher Apprenticeship Programs (RTAP), forge high-retention pathways including residency models, create supportive and inclusive mentoring, and share culturally responsive, anti-bias school leader resources.
- Disseminate guidance that would encourage school report cards to contain information on teacher demographics, teacher experience, and teacher certification.

Early Childhood Education

Unfortunately, the long-running racial and socioeconomic inequities within our early childhood education (ECE) system begin before children even [enter kindergarten](#). In fact, as of 2018, a majority of Americans prior to the pandemic resided in [child care deserts, with the most significant disparities facing rural families, as well as Latino families and 60% of American Indian and Alaska Native families](#). By comparison, the areas that are least likely to have child care shortages are high-income suburban neighborhoods, which tend to be [predominantly white](#). Unsurprisingly, the COVID-19 pandemic exacerbated our nation's child-care crisis. As a 2023 [analysis](#) from DHS details, child-care employment plummeted in the early months of the pandemic by roughly 35%. While the child-care sector has grown since then, buoyed in large part by crucial federal relief funding provided by the American Rescue Plan (ARP), it has yet to return to pre-pandemic levels. Additionally, while ARP funding was a critical lifeline to communities, providers, and families in their pursuit to provide and/or access early childhood services, the expiration of those funds in 2023 threatens recovery efforts. For example, [analysis](#) from the National Women's Law Center demonstrates that from fall 2023, when federal relief funds expired, through spring 2024, the percentage of families without child care increased, particularly in states without significant additional state investments in early childhood programs. We remain deeply concerned with how these growing inequities will impact underserved families.

Even when families, particularly families of color, have access to child-care services, the cost — which may take up to [116%](#) of a low-income family's household income — can be prohibitive without financial assistance. Research on comprehensive, high-quality, birth-to-five early childhood programs for traditionally underserved children found that they [yielded a 13% return on investment](#) per child annually, through better education, economic, health, and social outcomes. However, when states do fund high-quality preschool programs, access is often lower

for [Black and Latino children, who are under-represented](#) in several such programs. Compared to early learning programs attended by white children, programs attended by Black children are, on average, [lower quality](#), and therefore aren't associated with the many positive outcomes linked to high-quality early learning opportunities. Young children of color who do have access to early childhood education are also pushed out of the classroom at alarming rates: Black children are [disproportionately suspended and expelled](#) from early learning settings, even though such practices are harmful and [ineffective](#).

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Make significant investments in the early childhood education system by reintroducing and passing the [Child Care for Working Families Act](#). The bill would subsidize child care for all families within 150% of a state's median income and below, ensuring they spend no more than 7% of their income on child care, and fund pre-K expansion.
- Increase funding for existing programs that can help meet the need for quality early childhood education, including Head Start, Early Head Start, Preschool Development Grants Birth through Five, and the Child Care and Development Block Grant.
- Restore the expanded Child Tax Credit, which drove child poverty to a [record low in 2021](#), and [cut monthly child poverty](#) by nearly 30%.

EXECUTIVE

The next administration should:

- Issue guidance on how best to ensure quality standards for early childhood education are culturally and linguistically competent, including detailing how to design standards that include input from people of color and multilingual people.
- Issue guidance on how best to invest Title III funds to promote research-based dual-language immersion models for dual-language learners in ECE.

Access to Safe, Equitable, and Positive Learning Environments

EdTrust is dedicated to policy solutions related to addressing and improving students' social, emotional, and academic development (SEAD). School is where students spend the bulk of the time learning about themselves and the world, and where they develop critical relationship-building skills with their peers and educators. Supporting students' SEAD is critical, and [over 90% of schools and districts](#) report that they are working to support the social and emotional learning of students. [Studies also show](#) that social and emotional well-being is inextricably linked to the context in which students develop and the relationships they build over time. Too often, approaches to supporting social and emotional learning in schools [ignore context](#), focusing solely on

building specific skills (e.g., lessons on controlling behavior or emotions). Ignoring context carries significant risks, especially for those students who are already underserved by our education system: students from low-income backgrounds, students of color, LGBTQ+ youth, students with disabilities, and multilingual learners. Failing to acknowledge the influence of the learning environment or failing to address the processes and structures in schools that disadvantage some students, may do more harm than good.

To truly support all students' [social, emotional, and academic development with an equity lens](#), policymakers must first address adult biases and beliefs and the systems and structures in place before turning to skill-building programs. For example, Black middle and high school students are over [three times more likely](#) to attend a school with more security staff than mental health supports, significantly harming their social, emotional, and academic development. Additionally, studies show that adult bias influences discipline decisions. Black students are [disproportionately](#) suspended, expelled, and arrested at school for exhibiting the same behaviors as their white peers. According to the 2017-18 [Civil Rights Data Collection](#) (CRDC), Black students comprise only 15% of school enrollment, but account for 31% of students who receive in-school suspensions; 38% of students who receive out-of-school suspensions; 39% of those expelled with educational services; 29% of students referred to law enforcement; and 32% of students who were arrested at school. Furthermore, underserved students, including students of color and students with disabilities, are disproportionately subjected to harmful physical discipline practices that threaten their safety and well-being, including corporal punishment and dangerous seclusion and restraint practices. For example, according to the 2017-18 CRDC, students with disabilities account for 78% of students who are secluded or restrained in the classroom. Additionally, Black students with disabilities — who account for 18% of students with disabilities served under IDEA — represent 26% of physical restraint cases; 34% of mechanical restraint; and 22% of seclusion. Regarding corporal punishment — [which is still legal in 23 states](#) — Black students are corporally punished at twice the rate of white students, and students with disabilities are more likely to be subjected to corporal punishment than their nondisabled peers.

On the heels of the COVID-19 pandemic, chronic absenteeism has nearly doubled from 16% to almost 30% for [students](#) nationwide. Chronic absenteeism, defined as missing 10% or more of a school for any reason, is a pressing national issue, and serves as a warning sign that a student may be off-track academically, including reading proficiently by third grade, graduating from high school, and pursuing postsecondary education. [For example, children from low-income backgrounds are two to three times more likely to be chronically absent](#)— and face the most harm because their community often lacks the resources necessary to make up for the unfinished learning in school. Students from communities of color as well as those with disabilities are also disproportionately affected due to issues related to their socio-economic status, chronic illness, or other critical factors impacting their social, emotional, and physical well-being.

Chronic absenteeism is more than just students not showing up to school; it is a symptom of a variety of root causes impacting students, their families, and communities. Chronic absenteeism can be the result of many factors, such as a student's lack of engagement in school, low self-esteem, physical and learning disabilities, chronic illness, mental health issues, lack of childcare, transportation barriers, exposure to violence or neglect, unsafe school environments, or a lack of trust in adults in schools. Chronic absenteeism may also be the result of a school that isn't appropriately supporting students' social, emotional, and academic development, resulting in a lack of belonging and connection among certain students. Our education system [must respond to this](#) national crisis and do more [to engage families](#) to solve this problem.

Two other essential elements of equitable learning environments are adequate nutrition and broadband access. Hungry children have a much harder time learning. Proper nutrition enhances cognitive function, concentration, and overall academic performance. Access to home internet is also necessary for students to access digital learning resources, complete assignments, and engage in interactive educational activities. Together, these elements ensure that students are physically healthy and have the digital tools necessary for academic success. Too often, students of color and students from low-income backgrounds have less access to these vital resources than their white peers.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Reintroduce and pass both the [Protecting Our Students In Schools Act](#) and the [Keeping All Students Safe Act](#), which would protect students' safety and well-being by eliminating corporal punishment and dangerous seclusion and restraint practices, respectively.
- Reintroduce and pass the [Ending PUSHOUT Act](#), which would create a grant program for states and schools that commit to ending discriminatory disciplinary practices and improving their school climates, providing resources to create more inclusive discipline policies, support professional development to educators, and invest in school counselors and mental health staff to implement evidence-based practices.
- Reintroduce and pass the [Counseling Not Criminalization in Schools Act](#), which prohibits the use of federal funds to support the hiring, recruitment, and placement of police officers in K-12 schools, and establishes a grant program to increase access to adequately trained personnel and trauma-informed services.
- Build upon the investments made in the Bipartisan Safer Communities Act, including by continuing to invest in both the School-Based Mental Health Services Grant and the Mental Health Services Professional Demonstration Grant, which both aim to increase access to and the quality of mental health services in high-need districts by training and diversifying the pipeline of school counselors, school psychologists, social workers. Furthermore, to ensure that these programs are successful and that eligible entities have the resources and capacity necessary to take advantage of these programs, Congress should pass the [Creating Access and Resources in Education \(CARE\) for Student Mental Health Act](#), which would streamline the programs and help provide additional technical assistance to ensure potential grantees have the information and assistance necessary to compete for and implement these programs.
- Invest more resources in [extended learning time](#) and [high dosage tutoring](#) to continue to tackle the unfinished learning experienced by students during the pandemic, and for resources to address students' and educators' social, emotional, and mental health needs.
- Invest in evidence-based practices to decrease chronic absenteeism. Specifically, Congress should increase funding for programs that support [authentic student, family, and community engagement](#), including funding for Title I of ESSA, Statewide Family Engagement Centers, and to create a permanent Office of Family Engagement within the Department of Education to provide guidance to states and districts regarding effective family engagement strategies.
- Restore funding to the Affordable Connectivity Program to enable online K-12 learning access for millions of students.

- Continue to fund and expand investments in Full-Service Community Schools, which provide support for the planning, implementation, and operation support to children and families, attending high-poverty schools.
- Eliminate the 50% funding administrative match requirement that has prevented some states from participating in the Summer EBT program, which provides critical support to address child hunger in the summer months.
- Increase the federal reimbursement Community Eligibility Provision (CEP) schools receive to ensure more schools can alleviate student hunger and food insecurity. The CEP within the Free and Reduced Price Lunch program was expanded in 2023 by lowering the minimum identified student percentage participation threshold from 40% to 25%, ensuring that more high-need schools can offer free school meals to millions of students.
- Increase funding for outreach and education to better connect families from low-income backgrounds to SNAP, WIC, TANF, and other federal nutrition assistance programs that reduce hunger and lift families out of poverty.
- Reject any attempt to cut SNAP, or to impose onerous work requirements that would exacerbate hunger and food insecurity for millions of families. Rather, Congress should look to expand access to SNAP, such as by eliminating the lifetime ban on nutrition assistance for individuals convicted of a drug related felony, as well as by eliminating barriers that prevent millions of food-insecure college students from participating in SNAP.
- Ensure that the next reauthorization of the Farm Bill continues regular reevaluations of the Thrifty Food Plan, as included in the 2018 Farm Bill, to ensure SNAP benefits continue to reflect changes in food prices, food composition, and consumption patterns, and dietary guidelines.

EXECUTIVE

The next administration should:

- Disseminate guidance to states on how best to monitor and reform policies that disproportionately harm children of color, including corporal punishment, seclusion and restraint, and suspension and expulsion, as well as how existing federal funding streams can be used to reduce harsh discipline practices and narrow racial disparities.
- Strengthen the existing nonregulatory guidance [issued](#) in May 2023, “Resource on Confronting Racial Discrimination in Student Discipline.” While civil rights protections must be upheld independent of supplementary regulatory efforts, this document provides helpful resources and examples for schools to address racial discrimination in school discipline and should be strengthened. In working to strengthen the nonregulatory guidance, the Department should revisit the 2014 guidance issued by the Departments of Education and Justice related to the nondiscriminatory administration of school discipline. This improved guidance should include directions on how to build anti-racist, anti-sexist, and anti-discriminatory schools; promote culturally sustaining and restorative practices as an alternative to punitive discipline; regularly hold anti-bias training for educators; invest in staff and structures that support student needs instead of structures that criminalize them; effectively engage students, families, and the community in the process of creating and implementing discipline policies; discontinue discriminatory dress and grooming code policies that can lead to sex and race discrimination; and use healing-centered engagement in place of punitive or deficit-based practices to support students who experience chronic stress or acutely harmful experiences.

- Pursue administrative actions regarding nutrition assistance programs like SNAP that lower barriers between children and families having access to food.
- Create a permanent Office of Family Engagement within the Department of Education to provide guidance to states and districts regarding effective family engagement strategies.

Higher Education Policy Priorities and Recommendations

Our nation's higher education system is undergoing significant transformation across many areas, with outsized impacts for the most traditionally underserved student populations. On average, a college degree remains a viable path to higher lifetime earnings. However, the benefits of education beyond high school vary from program to program, and too many people of color and women don't experience the same general return on investment. That discriminatory reality, in conjunction with rising college costs and student debt, has led more people to question the value of spending time and money on education beyond high school. This has resulted in college enrollment declines, exacerbated by the COVID-19 pandemic, especially at community colleges, and low completion rates. These declines and low completion rates will only aggravate [deep and persistent racial and economic disparities](#) in who accesses and who completes a postsecondary credential. This is increasingly problematic as the country is becoming more diverse. These negative outcomes also fail to address macroeconomic challenges facing America. The United States lags behind other [OECD nations' postsecondary education levels](#). The response to these issues must include a reinvestment in our nation's higher education system, including a federal-state partnership for debt-free college and overall increases in funding for institutions and programs that we know work.

In addition to those structural concerns, there are acute issues that demand the attention of the next administration. The Free Application for Federal Student Aid (FAFSA) continues to be a crucial resource for students seeking financial assistance to access college, but the implementation of recent changes simplifying and streamlining the application has been delayed, which has confused and ultimately discouraged hundreds of thousands of prospective students. It has had an especially problematic effect on mixed-status students and their families. This difficult rollout is also coming at a time of increasing financial strain on both institutions and students, and it is essential that the system operates properly for the next cycle and beyond.

Furthermore, the Supreme Court's ruling restricting the use of race as a factor in college admissions has the potential to roll back any potential increases in the diversity of student bodies and limit opportunities for students of color. It is important that institutions of higher education do not overcorrect and that they still promote and strive for diverse and inclusive campuses despite this narrowing of the law. This also includes pushing back on the elimination of needed resources to support students of color and students from low-income backgrounds, and affirmatively creating modern and inclusive support systems.

To combat these inequities that threaten the American Dream, the federal government must act boldly to support our nation's prospective and current college students, as well as student borrowers, and in doing so, must also advance education equity across the following areas:

Investing Equitably in Our Students and Higher Education System

The next administration should take bold steps to improve the Pell Grant, create a federal-state partnership for debt-free college, expand student debt relief, and ensure that filling out the FAFSA isn't a barrier to college access to ensure millions more students achieve an affordable and high-quality postsecondary credential. The Pell Grant program [benefits](#) over 7 million students annually and is incredibly effective in helping students from low-income backgrounds access college. Over one-third of white students, two-thirds of Black students, and half of Latino students [rely on Pell Grants](#) every year. Pell Grant dollars are also well-targeted to those in need: 83% of Pell recipients come from families with annual incomes at or below \$40,000, including 44% with annual family incomes at or below \$15,000.

However, the purchasing power of the Pell Grant has dropped dramatically over the past several decades. In 1980, the maximum Pell Grant award [covered](#) 77% of the cost of attendance at a public university, but today it covers just over 28%, the [lowest](#) portion in over 40 years. If the maximum award continues to stagnate, the grant will [cover](#) just one-fifth of college costs in 10 years. That stagnation has contributed to the ballooning and unsustainable level of student debt weighing down millions of students, with the most pernicious and damaging effects [felt by Black borrowers](#). Additionally, too many students from low-income backgrounds are being forced to stop out of college due to increased financial strain, and [fewer high school students](#) are filling out the Free Application for Federal Student Aid (FAFSA), partially due to the ongoing struggles related to Better FAFSA implementation. The new federal funding formula will drive more Pell Grant aid to more students from low-income backgrounds, while operating alongside the needed expansion programs that use Pell to educate students who are incarcerated. We support both of these policies but are also mindful of the need to avoid shortfalls within the program.

Furthermore, student debt remains an ongoing crisis, particularly for students of color and students from low-income backgrounds. [Black borrowers](#), on average, owe \$25,000 more than their white counterparts just four years after graduation. This disparity is exacerbated by [systemic inequities in higher education](#) and the labor market, making it difficult for these students to repay their loans and build financial stability. The next administration should continue work on creating [pathways to targeted debt cancellation](#), working with Congress to improve the system, and ensure the Department of Education and servicers are sharing clear, consistent information to help borrowers navigate the system.

Finally, as noted in [letters](#) sent to state governors from the Department of Education last year, HBCUs, MSIs, and TCUs generate close to \$15 billion in economic impact and over 134,000 jobs annually. However, over a century of inequitable funding to these institutions versus their public peers has resulted in fewer resources for students and delayed investments in infrastructure and research and development. According to the [National Center for Education Statistics](#), there has been a \$12 billion funding disparity between land-grant HBCUs and their non-HBCU peers just from 1987 to 2020.

Additionally, HBCUs play a crucial role in producing graduates in STEM (science, technology, engineering, and mathematics) fields. Despite representing only 3% of U.S. colleges and universities, HBCUs produce nearly 20% of all Black graduates in STEM disciplines. In addition to the traditional funding streams located within Titles III and V in the Higher Education Act, these institutions have also been [recent recipients](#) of Research and Development Infrastructure (RDI) grants. The next administration should do more to close these historic disparities and invest in research and development capacity at these institutions.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Pass the [Pell Grant Protection and Expansion Act](#), which would dramatically strengthen the Pell Grant program and assist students in the following ways: double the max award; reindex the award to inflation; make funding for the program fully mandatory to eliminate potential shortfalls; and expand it to undocumented students, among other provisions to support students from low-income backgrounds.
- Pass legislation to create a federal-state partnership to incentivize states to invest in making public two- and four-year higher education debt-free for all, while prioritizing support for underserved students (i.e., students of color and students from low-income backgrounds) and the institutions that serve them. This partnership should include eligibility for students attending HBCUs, HSIs, MSIs, and TCUs.
- Increase funding for institutions of higher education designated in Title III and Title V of the Higher Education Act, specifically HBCUs, HSIs, MSIs, and TCUs.
- Pass equitable, targeted debt cancellation for millions of borrowers who are struggling with near insurmountable repayment burdens, many of whom are subject to massive generational disadvantages due to the racial wealth gap.
- Codify the new debt cancellation regulation promulgated in 2024, including the hardship pathway, to allow for the cancellation of student debt and reject proposed changes to the Higher Education Act to curb the Secretary's authority to do so.
- Refuse to advance any legislation to allow Pell to flow to short-term programs without exclusions that bar for-profit colleges and online programs from accessing Pell for these types of programs, and additional guardrails that ensure only high-quality programs can access these benefits.

EXECUTIVE

The next administration should:

- Use the new pathways created by the 2024 debt cancellation regulations, including the hardship regulation, to equitable, targeted debt cancellation for millions of borrowers who are struggling with near insurmountable repayment burdens, many of whom are subject to massive generational disadvantages due to the racial wealth gap.
- Maintain all existing income-based repayment options, including the SAVE plan, and expand eligibility for all income-based repayment options to Parent PLUS loans.
- End federal student loan collection actions like the seizure of Earned Income Tax Credits, tax refunds, social security garnishment up to \$2,500 annually, and wage garnishment, which can harm borrowers from low-income backgrounds.
- Implement the prison education program regulations with fidelity and transparency, ensuring technical assistance is available to education programs entering or transitioning into the new regulatory process, and sharing information on program creation and challenges faced with stakeholders.

- Provide guidance and technical assistance to Title III and V grantees outlining how best to include allowable activities not explicitly outlined in the Higher Education Act; the impact of pre-award costs; and how best to leverage the funds to maximize the benefit for students of color, among other improvements.
- Ensure the FAFSA system is functioning at maximum efficiency and capacity, and prioritize providing resources and technical assistance to students, families, and stakeholders as they navigate the process.

Data and Transparency

There has been consistent bipartisan support for improving our current higher education data systems so they may provide more reliable, consistent, and usable information. A student-level data system, currently barred by federal law, would make data on key measures of student success — enrollment, persistence, retention, transfer, and completion, as well as post-enrollment outcomes such as earnings and employment — much easier to obtain and disaggregate by race, income, gender, age, ancestry, and other important criteria. In addition, collecting disaggregated [parent-student data](#) is essential, because traditional students may face different challenges than students who are parents or caregivers. Lastly, the next administration can also improve the existing data infrastructure of the executive branch and do more to share information with the public.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Reintroduce and pass the bipartisan, bicameral [College Transparency Act](#), which would overturn the ban on the creation of a student-level data system and create a new system that would be immensely important in helping policymakers design systems that promote equity.
- Appropriate additional funds for the Institute of Education Sciences (IES) for data, evaluation, and research activities that help identify which activities improve outcomes for different groups of students, understand how those activities are most effectively implemented and improve states data collecting and reporting infrastructure. Within IES specifically, increasing support and funding for the [Statewide Longitudinal Data System \(SLDS\)](#) grant program increases the state's ability to create reports that utilize data types that span from early childhood education to the workforce. Increasing funding to the IES and SLDS grant program allows states to continue their modernization efforts that build capacity to make evidence-based decisions and incorporate other data from state agencies that students may interact with.
- Ensure continued authority and funding for the administration to reserve a portion of HEA-appropriated program funds for a "pooled evaluation" fund.

EXECUTIVE

The next administration should:

- Promote the use of the College Scorecard and [refine how data is presented by the tool](#) to ensure that it is as useful to all students and their families by doing the following: maintaining the earnings threshold metric and display of national medians within the tool; reporting disaggregated earnings data, including by race and ethnicity, for at least at one and 10 years after graduation for each program of study; improving the repayment rate measures to ensure the data is relevant to students and families; and continuing to work toward increased data quality on certificates.
- [Add the following aspects](#) to the data collection activities conducted as a part of the Integrated Postsecondary Education Data System: increase the differentiation of short-term credentials and aligning program definitions with the Higher Education Act; include distance education enrollment in the 12-month enrollment survey; add disaggregates to the 12-month enrollment survey to reflect students' enrollment intensity and first-time or transfer status; and include and require all Title IV institutions to collect data on student parent status and mandate data reporting annually.
- Should use the full amount of any “pooled evaluation fund” [to improve data collection](#), data use, data transparency, and evaluation in ways that contribute to improving student outcomes.
- Create an IPEDS-like interface for researchers and the public to access and analyze de-identified federal education data from systems such as NSLDS (for federal student aid programs) and G6 (for grant programs to colleges).
- Increase transparency of upcoming grant competitions, including the internal timelines and key staff responsible for notice development and clearance, so the public has a chance to provide input on program design and administration to Department officials in a timely fashion even when the notice is not first published in draft form in the Federal Register.

Student Supports and Basic Needs

The next administration should prioritize innovative and effective interventions to help students get to and through college, especially those facing barriers like access to food and housing, inadequate childcare, a lack of financial and career advising, and transportation costs. Wraparound, evidence-based support models like the City University New York's (CUNY) Accelerated Study in Associate Program (ASAP) can be transformational for students and close racial equity gaps. [In New York City](#), ASAP nearly doubled three-year graduation rates for participants, up to 40% from 22%, and drove down the cost per degree by 11%. These findings were replicated by three pilot programs in [Ohio](#), which also nearly doubled three-year graduation rates, increased transfer rates to four-year colleges, lowered the cost per degree, and [showed positive effects](#) on enrollment, full-time enrollment, and credits earned. Building on this success, [additional ASAP pilot programs](#) at two West Virginia colleges began operating at the beginning of 2020. Investments in traditionally under-resourced institutions to support the implementation of evidence-based strategies that improve completion for students from low-income backgrounds and students of color are essential to making lasting, positive change for underserved students.

Additionally, [students who are hungry cannot learn](#), students who lack housing security cannot learn, and students who cannot connect to the internet at home cannot learn. A recent [GAO report](#) indicated that 23% of college students experienced food insecurity in 2020, and 79% were subject to restrictions that created barriers to accessing SNAP. [Another survey](#) found that 36% of university students, and 46% of community college students, were housing insecure in the past year. Furthermore, while these disparities [have closed slightly](#) in recent years, 83% of white households enjoy broadband access, compared with only 68% of Black families and 75% of Hispanic families. The lack of access to a stable, high-speed internet connection can be challenging for students transitioning to college and also those living at home while attending higher education.

Furthermore, on-campus childcare is essential for supporting student-parents. Approximately 4.8 million college students in the U.S. are parents, making up over 20% of the undergraduate population. Within this cohort, 1.7 million are single mothers. Access to reliable and affordable on-campus child care can significantly alleviate the stress and logistical challenges faced by student-parents. As detailed further [in this letter](#) from 56 organizations in support of increasing the funding for CCAMPIS, doing so would provide access to the child-care services they need to get to and through college. The student-parent population is increasing year after year, [reaching over 5 million this year](#). In a survey by the Hope Center of more than 20,000 student-parents, 70% indicated their current child-care provider was unaffordable. Similarly, an [EdTrust report](#) from August 2022 shows that on average, a student-parent would need to work 52 hours a week to cover child care and tuition costs at a four-year public college or university, and that the out-of-pocket costs for attending public college are substantially higher in relation to their childless peers. It is essential that Congress scale up the only program specifically designed to deliver on-campus child care to Pell-eligible student parents, which would dramatically enhance their chances of achieving educational success and financial stability.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Pass the [Postsecondary Student Success Act](#) and increase funding for the Postsecondary Student Success Grant program, which supports the creation and expansion of evidence-based student success programs that include wraparound services to increase retention and completion.
- Combat food and housing insecurity by doing the following: make it easier for college students to enroll in SNAP by [eliminating](#) the 20-hour work requirement; increasing investment in the SNAP Employment and Training program; increasing investment in the Basic Needs for Postsecondary Students program to better help meet the food and housing needs of college students; directing the Department of Education to coordinate with other federal agencies to identify students who might be eligible for certain federal benefits and coordinate efforts to enroll students in those programs; reversing and preventing harmful cuts or administrative actions negatively impacting access to SNAP; and explore funding increases and tax credit reform to increase access to housing for students from low-income backgrounds.
- Increase funding for the Child Care Access Means Parents in School Program (CCAMPIS), which is designed to increase affordable access to campus-based childcare for student-parents from low-income backgrounds.

EXECUTIVE

The next administration should:

- Continue to prioritize the awarding of Postsecondary Student Success grants to institutions of higher education that enroll and effectively serve significant numbers of students from low-income backgrounds.
- Issue guidance to institutions on how best to identify student support needs on campus and implement evidence-based policies to improve outcomes for underserved students, including lowering barriers to SNAP access for students.
- Direct the Department of Education to coordinate with other federal agencies to identify students who might be eligible for certain federal benefits and coordinate efforts to enroll students in those programs.
- Issue guidance, publish best practices, and deliver trainings to financial aid officials for using federal financial aid information to increase uptake of state and federal means-tested benefits among potentially eligible students.
- Establish a task force to conduct, or contract with a vendor to conduct, an audit of all higher education programs to identify opportunities to improve design and administration of the programs in ways that will improve program performance in terms of effectiveness, efficiency/economy, and equity.
- Ensure all competitive grant programs go through a policy review process, including stakeholder engagement, that includes reconsideration of possible eligibility criteria, competitive and invitational priorities, selection criteria and maximum possible points, and performance measures to ensure all notices inviting applications are structured with the strongest possible incentives for high-need colleges serving high-need students to carry out high-impact activities.

Consumer Protections and Accountability

Federal consumer protection regulations in higher education are essential to safeguard students and their families from deceptive practices and ensure fair access to quality education. With the rising cost of college and the continued practices of some unscrupulous for-profit institutions, students, especially students of color, can face misleading marketing, inadequate disclosure of financial aid terms, and subpar educational programs that do not deliver promised career outcomes. Federal safeguards like the recent gainful employment, fair value transparency, and borrower defense rules help to hold institutions accountable for providing accurate information about program costs, graduation rates, and job placement statistics. They also ensure that federal financial aid is used effectively to support students' educational goals and allow students who are defrauded and misled to be made whole and restart their educational journey. By enforcing standards and informing and supporting students, federal consumer protection measures contribute to a more equitable and reliable higher education system.

EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Codify the 2023 gainful employment, fair value transparency, and borrower defense rules to cement those essential protections for students and families within federal law.
- Codify additional consumer protections, including, but not limited to, preventing the withholding of transcripts from students, statutorily protecting the Enforcement Office within Federal Student Aid, and maintaining a complaint tracking system.

EXECUTIVE

The next administration should:

- Protect and enforce the 2023 [gainful employment rule](#) to help protect students of color and students from low-income backgrounds from being loaded up with debt from poor-performing programs.
- Protect and enforce the 2023 [borrower defense rule](#) to ensure that defrauded and misled borrowers can obtain justified student loan relief through a fair and accessible process and maintain their access to the courts if necessary.
- Help institutions properly implement the 2023 Financial Value Transparency (FVT) framework through providing responsive technical assistance to ensure proper reporting and students gain access to the most detailed information about the net cost of their chosen postsecondary degree or program.
- Define higher education value in a way that takes into account the following: minimum standards for institutions regarding the enrollment rate, performance, experiences, and outcomes of traditionally underserved students (i.e., students of color and students from low-income backgrounds); leeway for institutions making continual progress toward reaching their ambitious access and success goals regarding those metrics; the investments in traditionally under-resourced institutions to support evidence-based strategies to achieve those goals; and systemically underperforming institutions that after getting needed resources, time, and support, fail to meet minimum enrollment and performance standards.

Access to Safe, Equitable, and Positive Campus Climates

The federal government has a historical and vital role as the protector of civil rights and safety on college campuses. Colleges are venues for the exchange of ideas and the development and growth of students, and cannot be places where discrimination, hate crimes, or assault are allowed. We support federal policies that encourage institutions to create and maintain student support services that bolster [healthy campus racial climates](#) and increase a sense of belonging for all students. This is crucial in the aftermath of last year's Supreme Court decision to limit the use of affirmative action in college admissions, serving as the catalyst for states and university systems to eliminate diversity, equity, and inclusion (DEI) programming. Across some states, anti-DEI efforts have resulted in the elimination of funding for essential support systems for under-represented students. EdTrust recommends the following actions be taken by Congress and the next administration to address these issues:

LEGISLATIVE

Congress should:

- Pass legislation that would provide competitive grants to institutions to audit their complaint systems, promote existing federal, state, and accreditor complaint systems, and create resources and programming to make campuses more welcoming.
- Allocate more resources to the Department of Education Office to Civil Rights to enable additional investigations and increase enforcement of federal civil rights protections; promote their complaint system; and disaggregate and make more transparent existing complaint and resolution data by race, color, national origin, ethnicity, or ancestry, actual or perceived shared ancestry or ethnic characteristics, including membership in a religion that may be perceived to exhibit such characteristics.
- Pass legislation to create a federal campus climate survey and federally operated portal for students and staff at institutions of higher education to submit responses within annually; produce an annual report with data disaggregated by race, color, national origin, ethnicity, or ancestry, actual or perceived shared ancestry or ethnic characteristics, including membership in a religion that may be perceived to exhibit such characteristics; and allocate resources to assist colleges in ensuring their students and faculty are submitting responses.
- Allocate resources to the Department of Education Office of the Inspector General to audit the current Department of Education Office of Civil Rights complaint process.

EXECUTIVE

The next administration should:

- Enforce the recently promulgated Title IX regulation designed to protect students from gender-based violence and discrimination.
- Ensure that existing data collections administered by the Equal Employment Opportunity Commission and Offices of Civil Rights includes indicators that track and report incidents of bias or violence on campus to help inform Congress and the Department of Education as they look to address systemic racial and gender discrimination on America's campuses.
- [Require accreditors](#) to consider federal civil rights complaints, Clery Act data, and campus climate survey results as part of "key data and indicators" for ongoing monitoring, under CFR 602.19.
- Provide resources to institutions to audit their complaint systems, promote existing federal, state, and accreditor complaint systems, and create resources and programming to make campuses more welcoming.
- Promote the Office of Civil Rights' complaint system and disaggregate complaint and resolution data by race, color, national origin, ethnicity, or ancestry, actual or perceived shared ancestry or ethnic characteristics, including membership in a religion that may be perceived to exhibit such characteristics.

Conclusion

EdTrust's mission to advance education equity seeks to address the longstanding racial and economic barriers embedded in the American education system. As classrooms and colleges grow increasingly more diverse, it is crucial for policies and practices to evolve to meet the needs of *all* students, particularly those from underserved communities. Public education holds immense power to provide opportunities that will help all students thrive and serves as the foundation for a more equitable and prosperous society. By presenting federal policy recommendations to the next presidential administration, EdTrust aims to ensure that every student — regardless of race or income — has the resources and opportunities to succeed in a global economy, which will codify America as a world leader. We remain committed to achieving that future.