August 13, 2018

Division of Homeland Security and Emergency Management  
9195 E Mineral Avenue  
Suite 200  
Centennial, CO 80112  
ATTN: Amy Shish

RE: Open Comments for 8 CCR 1507-45, Rules and Regulations Concerning the School Security Disbursement Program

Dear Executive Director of the Department of Public Safety, Stan Hilkey

Thank you for the opportunity to comment on the proposed rule entitled, “School Security Disbursement Program” published August 3, 2018. I am writing on behalf the Colorado Health Foundation, which is the state’s largest private foundation and the third largest health foundation in the nation. We work closely with partners in the private, public, and nonprofit sectors to bring health within reach for all Coloradans.

We appreciate the effort of your staff and department in drafting this rule package and would respectfully request two changes grounded in best practices in school safety.

1. Revise language under item C.2 of section 5.1 titled “Eligibility” to expand eligible training beyond student threat assessment for all building staff who have contact with children to include how to build and promote a positive school environment and how to support student mental health, which have a strong evidence-base in preventing school violence.

2. Revise language under item C.3 of section 5.1 titled “Eligibility” to specify that these funds may be used to provide training to school resource officers in how to build and promote a positive school environment and how to support student mental health, which have a strong evidence-base in preventing school violence.

Research shows that student exposure to positive school climates and close relationships with peers and staff reduce the risk of student violence.1 In fact, three national studies demonstrated that schools where students reported feeling more connected to their school tended to have less disorder and violence.2,3,4 Therefore, we believe it is essential that all school personnel be eligible for trainings that can help them create these positive school environments through evidence-based practices.

We also want to thank you for the language in section 5.1.E, in which the “availability of the applicant to use financial resources to match the amount of the disbursement” remains a neutral criterion for consideration. Financial resources for schools vary by size and location. We believe every school should have the opportunity to receive state funding to improve and enhance the safety of their students and staff.
Creating safe, orderly and welcoming learning environments is critical to educating and preparing all children and youth to achieve their highest potential and contribute to society. Ensuring that trainings for school resource officers and other school staff include building and promoting positive school environments and supporting student mental health improves safety overall.

Thank you for this opportunity to comment in response to this proposal. If you have any questions or concerns about our recommendations, please contact Kyle Legleiter at 303-953-3618 or klegleiter@coloradohealth.org.

Sincerely,

Kyle Legleiter
Senior Director of Policy and Advocacy
Colorado Health Foundation