

Office of the General Counsel

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November 8, 2017

Submitted Electronically

Jennifer Bell-Ellwanger U.S. Department of Education 400 Maryland Avenue, SW, Room 6W231 Washington, DC 20202

Re: Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs – Docket ID: ED–2017–OS–0078

Dear Ms. Bell-Ellwanger:

On behalf of the United States Conference of Catholic Bishops (USCCB), we respectfully submit the following comments in response to the notice in the Federal Register regarding priorities for discretionary grants. 82 Fed. Reg. 47484.

Catholic schools are the nation's largest private educator, with more than 6,500 schools educating 1.8 million students. The USCCB is the voice of those schools and our Catholic community before the federal government.

We offer the following comments:

I. Educational Choice

Our faith teaches the importance of empowering parents and their decisions regarding their children's education. In the Second Vatican Council's Declaration on Christian Education, the Church states the following:

Parents who have the primary and inalienable right and duty to educate their children must enjoy true liberty in their choice of schools. Consequently, the public power, which has the obligation to protect and defend the rights of citizens, must see to it, in its concern for distributive justice, that public subsidies are paid out in such a way that parents are truly free to choose according to their conscience the schools they want for their children.

Gravissimum Educationis, no. 6.

Thus, the USCCB strongly supports the Secretary's Proposed Priority 1— Empowering Families to Choose a High-Quality Education that Meets Their Child's Unique Needs. We encourage the U.S. Department of Education to increase "the proportion of students with access to educational choice" (Priority 1, Sec. a), and to increase such access for the groups listed under Priority 1, Sec. b. Likewise, we applaud the expansive definition offered for "educational choice," especially the inclusion of faith-based providers.

II. Safe Environments

In regions with existing choice programs, Catholic school administrators are well aware that parents often seek a safer environment for their child – and are ready and eager to provide it. Proposed Priority 10 – Encouraging Improved School Climate and Safer and More Respectful Interactions in a Positive and Safe Educational Environment – recognizes this reality as well. Proper classroom discipline that enables robust discussion and intellectual engagement is essential to learning. Overly expansive or strictlydelineated definitions of "bullying," however, may unintentionally impede local decisionmaking on the best policies and practices for varying educational settings. We recommend caution and restraint by the Department in this Priority area, especially as regards P-12 education.

Respectfully submitted,

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