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THE 2025 STATE OF SCHOOL DISCIPLINE: The Quiet Undoing of School Discipline Reform in Ohio

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"No society can realistically expect schools alone to abolish inequality. If students come to school in unequal circumstances, they will largely, though not entirely, leave school with unequal skills and abilities in both cognitive and non-cognitive domains. This is not a reason for educators to throw up their hands. Rather, in addition to efforts to improve school practices, educators, along with community partners, should exercise their own rights and responsibilities as citizens to participate in redressing the inequalities with which children come to school."

-RICHARD ROTHSTEIN
AMERICAN ACADEMIC AND AUTHOR



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About Children's Defense Fund–Ohio

Established in 1981, Children's Defense Fund-Ohio (CDF-OH) is a statewide, multi-issue, child advocacy organization that has worked on behalf of children, young people, and families in Ohio for 45 years. Our mission is to build community so that young people grow up with dignity, hope, and joy.

HISTORY OF ADVOCACY:

This report builds on Children Defense Fund-Ohio's history of research on education equity and the state of school discipline, including:

- The State of School Discipline in Ohio (2024)
- The State of School Discipline in Ohio (2021)
- School Resource Officers: Recommendations for Maximizing School Safety and Minimizing Risks to Ohio Children (2018)
- School Discipline Policies and the Cradle to Prison Pipeline (2017)
- Zero Tolerance and Exclusionary School Discipline Policies Harm Students and Contribute to the Cradle to Prison Pipeline (2012)

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Executive Summary

Overview

Ohio school districts have made progress over the past two decades, moving away from ineffective discipline policies that perpetuate social inequality and undermine school climate. Recent policy shifts, however, place these gains at risk. This report examines the current state of school discipline in Ohio and analyzes administrative changes that threaten to reverse decades of investment in innovative disciplinary practice at a moment when sustained improvement remains necessary.

Community Engagement

As part of this report, CDF-Ohio engaged with school administrators, and Positive Behavioral Intervention Supports (PBIS) specialists to solicit their thoughts and insights on this topic. We believe it is essential that their voice, the voice of those working most closely to undo the harm caused by exclusionary discipline, be part of the conversation and recommendations.

The State of Ohio Discipline

Exclusionary discipline remains widespread in Ohio and is applied unevenly across student populations. In the 2024-25 school year, the state recorded 10.2 incidents of suspension or expulsion per 100 students. These practices disproportionately affect marginalized students. Black, non-Hispanic students are four and a half times more likely than White students to experience exclusionary discipline. Students who are economically disadvantaged are roughly twice as likely to face suspensions or expulsions as their peers, and students with disabilities experience exclusionary discipline at nearly six times the rate of students without disabilities. Many suspensions continue to result from minor or subjective infractions, such as “disruptive” or “disobedient” behavior, rather than conduct that poses a serious safety concern.

Recommendations

Ohio has already invested significant time and resources in evidence-based discipline reforms. Rather than weakening these efforts, state policymakers should strengthen and expand the frameworks that help schools address the root causes of student behavior while maintaining safe and supportive learning environments. The following actions would reinforce Ohio's progress and reduce reliance on exclusionary discipline:

Reaffirm and expand the SAFE Act

Limit exclusionary discipline to serious safety threats and extend protections to additional elementary grade levels while providing funding for counselors and behavioral supports.

Restore clear standards for evidence-based discipline frameworks

Maintain explicit requirements for Positive Behavioral Interventions and Supports (PBIS) and Multi-Tiered System of Support (MTSS) implementation, including leadership structures, training, and accountability mechanisms.

Invest in sustained professional development and student support staff

Provide funding for counselors, psychologists, social workers, and behavioral specialists who can support prevention and intervention strategies.

Improve transparency and accountability in discipline data

Continue collecting and publicly reporting disaggregated discipline data to monitor disparities and guide policy decisions.

Strengthen family and community partnerships

Create structured opportunities for families, students, and community organizations to inform discipline policies and support school climate initiatives.

Expand whole-child supports in schools

Increase access to community learning centers, school-based health services, expanded Medicaid billing for schools, and universal free school meals to address nonacademic barriers to learning.



Introduction

In recent years, Ohio school districts have begun implementing discipline practices and educational policies that address nonacademic barriers to learning and promote students' overall health and development. This shift reflects a growing consensus among education experts that academic achievement is inseparable from students' physical health, mental well-being, safety, and sense of belonging. For instance, the Whole School, Whole Community, Whole Child framework, developed by the Centers for Disease Control and Prevention (CDC) in 2014, is a leading example of an evidence-based approach to integrating health, social services, and community partnerships into the core mission of public-school systems. The framework underscores that positive school climate and student well-being are essential conditions for improving academic outcomes and advancing equitable, long-term student success.

As part of this shift, many Ohio school districts have moved away from punitive, zero-tolerance disciplinary frameworks and reconsidered the much-maligned use of exclusionary discipline—practices such as out-of-school suspension or expulsion—which research shows are largely ineffective and often harmful. These practices disrupt learning, increase absenteeism, are linked to lower academic achievement, and are applied inequitably to students of color, students with disabilities, and students from low-income backgrounds.

Instead, many districts have adopted structured frameworks such as MTSS, including PBIS, to replace exclusionary discipline with data-driven interventions that improve school climate, reduce disciplinary disparities, and keep students engaged in learning. Our research indicates that Ohio school districts have invested significant time and effort to build professional capacity in these practices and are beginning to see improvements in disciplinary outcomes.

Despite sustained reform efforts, reliance on exclusionary discipline remains high. Out-of-school suspensions and expulsions in Ohio peaked at 13.1 incidents per 100 students in the 2005-2006 school year and remained elevated at 10.2 per 100 students in 2024-25. Black, non-Hispanic students are four and a half times more likely to face exclusionary discipline than their White peers. Many school districts have yet to fully implement Whole Child frameworks, and those that have often require additional resources and state support to improve fidelity, establish accountability, and expand their reach. Meaningful challenges persist.

Yet the tide of disciplinary reform has begun to turn. On April 9, 2025, Governor DeWine signed [House Bill 206](#) into law, expanding school administrators' authority to impose exclusionary discipline beginning this school year, despite [concerns](#) raised by the American Civil Liberties Union (ACLU) of Ohio and others. This bill was part of broader reforms legislated in the 2023 Ohio Budget that reduced democratic oversight of education by transferring key policy authority from the partially elected State Board of Education to a governor-appointed director.

Simultaneously, the Ohio Department of Education and Workforce is poised to adopt revisions to OAC 3301-35-15 that would substantially weaken the standards governing PBIS implementation. The proposed changes replace clearly defined, research-based requirements with a poorly specified alternative, threatening to undermine the foundation of school discipline reforms built through years of investment in implementation capacity. In doing so, they risk reintroducing the very conditions earlier reforms sought to address: fragmented implementation, inconsistent application of discipline, and renewed reliance on exclusionary practices that have historically produced inequitable outcomes.

The situation is not irreparable. Ohio retains substantial institutional knowledge, trained personnel, and implementation experience with evidence-based non-exclusionary discipline practices. With timely action from legislators, advocates, and education leaders, the state can build on the existing foundation rather than allowing hard-won progress to quietly unravel.

School Discipline Reform in Ohio

Ohio's modern system of school discipline has its roots in a "zero-tolerance" era that began in the late 1990s. Under the statute first enacted under House Bill 650 by Ohio's 122nd General Assembly, public school districts were required to adopt a [zero-tolerance policy](#) "for violent, disruptive, or inappropriate behavior, including excessive truancy."

Through the 2000s and into the 2010s, exclusionary practices such as out-of-school suspensions and expulsions remained widespread and often functioned as the default response to student misbehavior. These practices were ineffective and harmful, especially for young children, students of color, students from low-income backgrounds, and students with disabilities.

According to [research](#) by the American Psychological Association (APA), despite more than 20 years of use, empirical data do not show that mandated punishments increase disciplinary consistency, that removing students improves school climate and safety, or that severe sanctions deter future misbehavior. Where evidence exists, it often contradicts these claims. The review also concluded that exclusionary discipline deepens schools' entanglement with the juvenile justice system and conflicts with established research on adolescent development. Further [research](#) shows that the use of suspension and expulsion in schools harms academic achievement, independent of students' socio-demographic characteristics.

Moreover, exclusionary discipline practices are [disproportionately](#) applied to [children of color](#), children with disabilities, and children from low-income families. According to the U.S. [Department of Education](#): "Black boys represented 8% of total K-12 student enrollment, [...] but 18% of those who received one or more out-of-school suspensions, and 18% of those who were expelled." This pattern is not new.

In Ohio, Children's Defense Fund-Ohio has long documented persistent racial and economic disparities in the use of exclusionary discipline. The [2021 State of School Discipline in Ohio](#) report found that the state's suspension and expulsion rates remained high compared with national benchmarks and that urban districts experienced nearly five times the rate of exclusionary discipline as suburban districts. At the time, Black students were subject to exclusionary discipline at a rate of 26.2 incidents per 100 students—more than five times the rate of their White peers. Three years later, the [2024 State of School Discipline in Ohio](#) report showed that these disparities remained.[1]

[1] Since publication of the 2024 report, the Department of Education and Workforce identified duplicate records in previously released discipline data and issued a correction. Updated figures, including revisions to prior years, reflect the removal of duplicated entries.

CDF-Ohio's reports show that a substantial portion of suspensions and expulsions in Ohio are for nonviolent infractions, such as classroom disruption or defiance, and that exclusionary discipline in the state is linked to chronic absenteeism and increased contact with the youth justice system.

Mounting evidence about the academic and social consequences of exclusionary discipline prompted a gradual shift in Ohio toward Whole Child school policies. In 2018, the Ohio Department of Education [launched](#) the Each Child, Our Future strategic plan, followed in 2020 by the [Whole Child Framework](#), establishing guiding principles to improve Ohio's public education system for all students, regardless of circumstance or background. By all accounts, ODEW remains formally committed to the strategic plan and the core pillars of the Whole Child Framework, even as evidence suggests that school discipline reform is receding in practice.

The [Whole Child approach](#) recognizes that students' cognitive, social, emotional, and physical well-being are deeply interconnected. Poverty, housing instability, food insecurity, untreated health conditions, trauma, and other nonacademic barriers are at the root of many behavioral challenges. Schools alone cannot resolve these structural issues. Addressing them requires coordinated collaboration with families and community-based professionals beyond the classroom.

Successful implementation of the Whole Child framework relies on school-based strategies designed to mitigate nonacademic barriers to learning. These include expanded access to school breakfast and lunch programs, school-based health clinics, and social and emotional learning interventions. [Community learning centers](#) bring these elements together by integrating academic instruction with health, social, and family supports, strengthening both the school's role in the community and the community's role in the school. Ohio's leadership in this area dates back to 2002, when Cincinnati Public Schools piloted the community learning center model at Oyler School, demonstrating how integrated academic, health, and social supports can transform school communities.

Within this broader movement, schools increasingly adopted structured, prevention-oriented frameworks such as MTSS and PBIS as alternatives to zero-tolerance discipline.

[MTSS](#) is a comprehensive school climate framework for identifying and addressing students' academic and behavioral needs through graduated levels of support. At Tier I, schools provide supports for all students, including universal screening to identify students at risk, ongoing data collection and progress monitoring, and positive school climate practices. Tier II and Tier III offer increasingly targeted and individualized interventions for students who require additional support. Tier II typically includes small-group instruction, structured peer support, and targeted skill-building. Tier III involves intensive, individualized interventions such as behavior plans, specialized academic instruction, one-on-one mentoring, or coordination with counselors and other service providers. The tiered structure is designed to ensure that support is timely, proportional, and responsive to documented need.

[PBIS](#), often implemented within an MTSS structure, focuses specifically on improving school climate and student behavior. Rather than relying on punitive responses, it establishes clear behavioral expectations, teaches those expectations explicitly, reinforces positive behavior, and uses discipline data to guide interventions. The framework prioritizes prevention, consistency, and restorative responses, reducing reliance on suspension and expulsion while promoting safer and more supportive school environments.

Alternatives to Exclusionary Discipline Practices

Alternatives to exclusionary discipline include several effective practices. According to the [Institute of Education Sciences](#), the most effective alternatives to exclusionary discipline practices can be grouped into four categories:

Restorative Justice

This approach builds a network of relationships to achieve discipline through participatory learning and decision-making, involving teachers, administrators, staff, and students to address conflicts and disruptions.

Trauma-Informed Practices

These practices aim to understand and address the impact of trauma, promoting healing and creating a safe, inclusive school environment.

Social-Emotional Learning (SEL) Strategies

SEL focuses on helping students understand and regulate their emotions, develop empathy, manage goals, and form positive relationships, fostering a supportive school atmosphere.

Positive Behavioral Interventions and Supports (PBIS)

This framework integrates interventions to discourage misbehavior and encourage positive conduct, enhancing school safety and culture through tiered programs that promote a sense of belonging.

In the mid-2000s, several Ohio districts adopted PBIS voluntarily, supported by regional State Support Teams, university partners, and federally funded technical assistance and training centers. Adoption expanded in the 2010s as national [research](#) increasingly linked implementation to reductions in suspensions, improvements in school climate, and gains in academic engagement. For districts grappling with persistent racial and economic disparities and the documented harms of exclusionary discipline, PBIS, alongside broader Whole Child policies, offered a practical pathway to align disciplinary practices with research on child development, trauma, and educational equity.

“What you hope is that PBIS is a preventative and proactive framework. So, even though the traditional Discipline system is there, you're hoping that your PBIS system is minimizing those out-of-school, in-school, disciplinary kinds of things. You're hoping that your system is, in effect, diminishing the likelihood of those consequences that happen...We want to see student improvement and better student outcomes. We want to see a reduction in in-school and out-of-school suspensions and just overall for the teachers to have a better experience within their workday.”

-RICARDO MYERS

STUDENT SERVICES SPECIALIST, AKRON SCHOOL DISTRICT

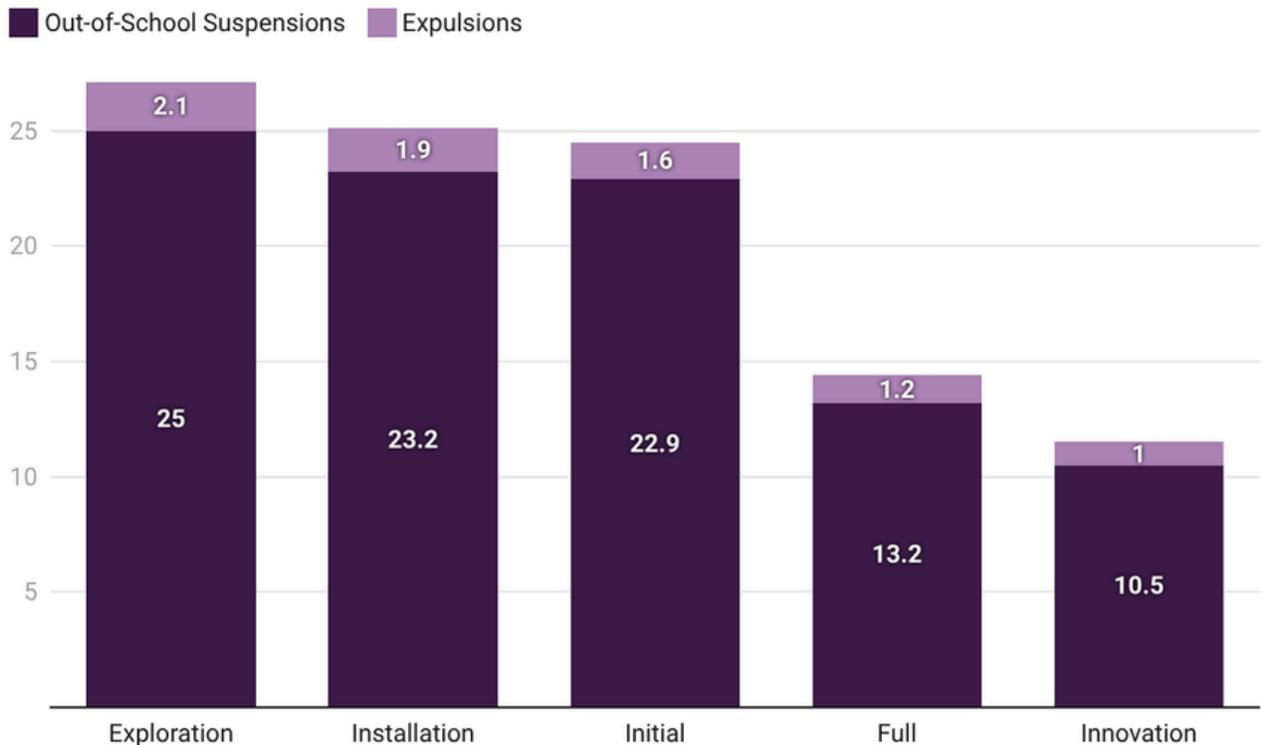
In 2013, the State Board of Education adopted a rule directing every district and school to implement PBIS. The rule, [codified](#) in OAC 3301-35-15, required each school to assemble internal PBIS leadership teams, provide staff training, teach and reinforce prosocial behavior, and collect data to monitor implementation.

In 2018, Ohio passed the Supporting Alternatives for Fair Education Act ([SAFE Act](#)), which prohibited out-of-school suspensions and expulsions for non-violent, non-disruptive behavior in pre-kindergarten through third grade. The SAFE Act reinforced the rationale behind PBIS: that young children respond better to instruction and support than to exclusion, and that disruptive behavior can be addressed through structured, school-wide systems rather than punitive removal. In [2021](#), Ohio revised its restraint and seclusion regulations to require staff training in de-escalation and further implementation of positive behavioral supports.

Early evidence seemed to indicate that the Whole Child Policies were having their desired effect in Ohio. In 2023, Mansfield City Schools, which implemented a PBIS system, [reported](#) a 50% drop in out-of-school suspensions. Moreover, the Ohio Department of Education and Workforce began to actively [collect data](#) and monitor PBIS implementation fidelity. ODEW data includes self-reported levels of implementation from early exploration to the highest “innovation and sustainability” designation. Schools at this top stage implement all systemic components of PBIS and conduct routine reviews to ensure fidelity. Data available in early 2025 showed that schools with higher levels of PBIS implementation consistently demonstrated reduced reliance on disciplinary referrals and exclusionary discipline, suggesting a strong relationship between implementation fidelity and improved disciplinary outcomes (see graphs).

Ohio Schools with PBIS are Less Reliant on Exclusionary Discipline

Average Discipline Rate by PBIS Implementation Level, up to 2024

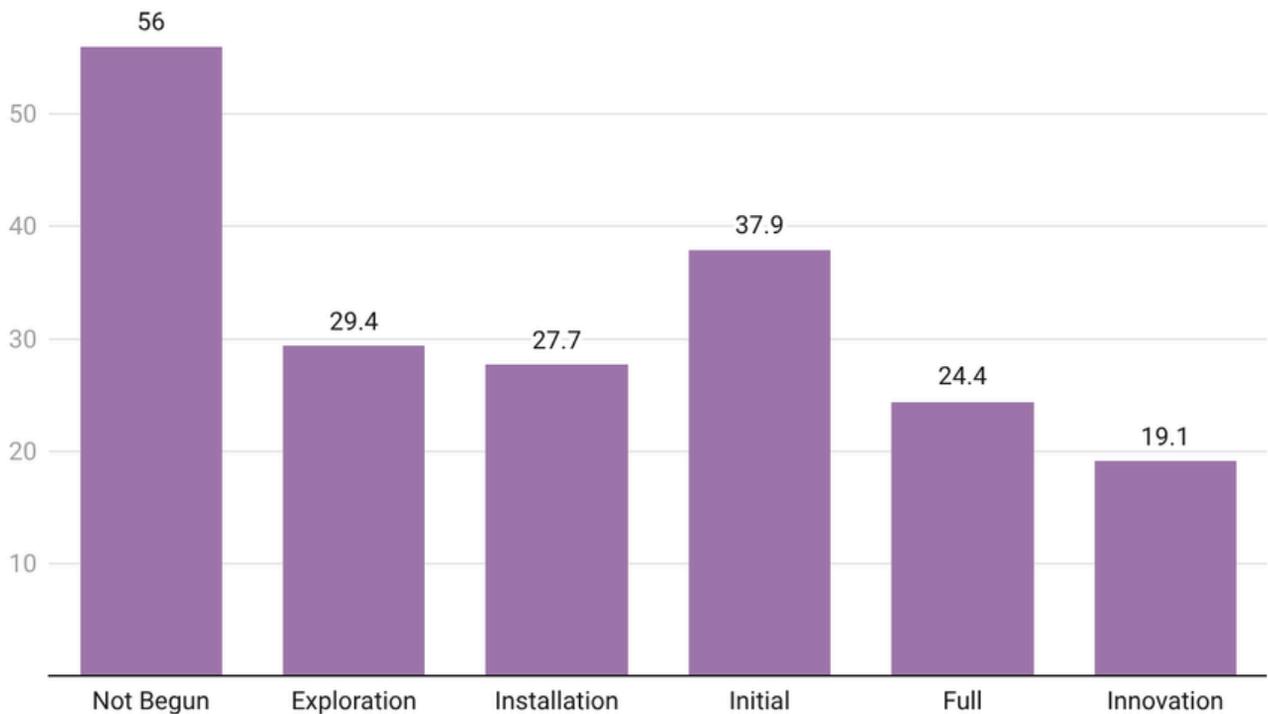


Instances of exclusionary discipline for every 100 students. Data from "PBIS Network Meeting" Slideshow, presented by Jennifer Ruff and Katie Pappas of the Office of Whole Child Supports, February 7th, 2025.

Created with Datawrapper

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Created with Datawrapper

Alongside PBIS, Ohio districts have experimented with restorative practices, which focus on proactively meeting students' needs—including those that result from trauma in or outside of school. Restorative approaches are increasingly paired with PBIS, creating a combined framework aimed at reducing exclusionary discipline while improving school climate. While adoption has been uneven across the state, these strategies represent a shift toward a more effective and equitable model of school discipline.

Today, PBIS is increasingly used as a behavioral support framework across Ohio. According to the 2024-2025 PBIS Recognition list provided by the State Support Team, 66 districts and 697 schools received official PBIS awards at varying levels of implementation and fidelity. This represents roughly 23% of Ohio schools and about 11% of school districts. Recognized districts range from large urban systems, such as Columbus, Akron, Cleveland Heights–University Heights, and Dayton, to smaller suburban and rural districts like Fayetteville–Perry, Kirtland, and Ross Local Schools. The diversity of awardees demonstrates that PBIS implementation is feasible across a wide variety of school contexts.

While these recognitions are self-reported, our conversations with school administrators and Ohio Department of Education and Workforce staff point to a broader reality: thousands of teachers have received PBIS training, hundreds of schools are actively implementing the framework, and tens of thousands of students across the state are increasingly accustomed to PBIS expectations. In short, over the past decade Ohio school districts have invested significant time and resources into the PBIS framework.

"[This framework is] data-driven. It's about teaching; it's about being consistent. It is about relationship building."

-HEIDI KERCHENSKI

EDUCATIONAL CONSULTANT, STATE SUPPORT TEAM REGION 8

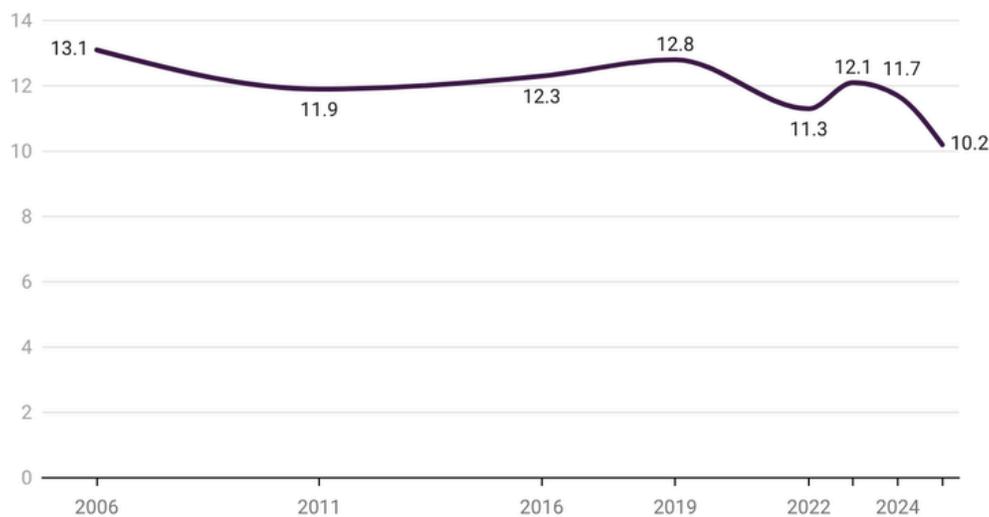
The State of Ohio Discipline

Data from the 2024-25 Department of Education and Workforce reinforce the trends and disparities documented in previous CDF-Ohio State of School Discipline reports, underscoring the need to expand school discipline reforms. Exclusionary discipline remains far too common in Ohio and is applied unevenly across students of different genders, abilities, racial backgrounds, and socioeconomic contexts. It is an outdated and unproven technique that punishes students for circumstances beyond their control.

Exclusionary discipline, defined as the combined use of out-of-school suspensions and expulsions, remains high in Ohio. In the 2024–25 school year, the rate declined from 11.7 incidents per 100 students the previous year to 10.2—the lowest point on record. This reduction reflects ongoing efforts to modernize school discipline practices. The 2018 Each Child, Our Future strategic plan and the 2020 Whole Child Framework created a systemic alternative to the traditional exclusionary discipline culture and correspond with the observed reductions in exclusionary discipline pictured in the figure below. Some of the decline can also be attributed to policies such as MTSS and PBIS, though these approaches are still implemented in only a minority of schools. These frameworks could be even more effective with greater investment, targeted alignment strategies, and consistent adoption across schools.

Exclusionary Discipline Rates Have Fallen but Remain Elevated

Out-of-School suspension and expulsion occurrences per 100 students in Ohio public schools



2020–21 discipline rates are excluded due to distortions from pandemic-related school closures. Data are labeled by the year the school year concluded.

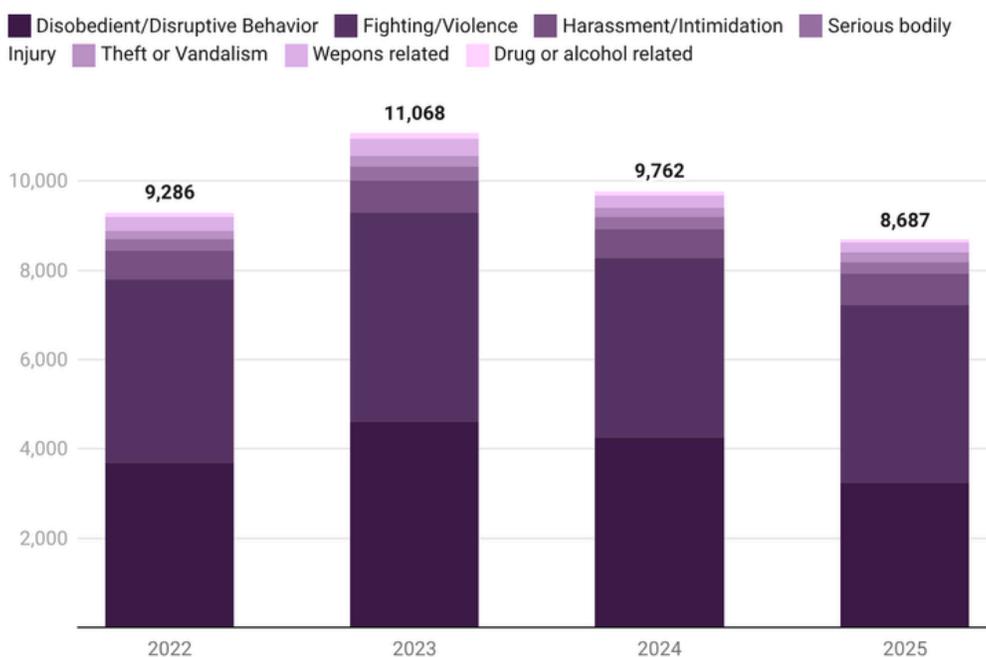
Chart: Based on CDF-Ohio • Source: Ohio Department of Education and Workforce, CDF-Ohio: 2024 State of School Discipline in Ohio • Created with Datawrapper

Some of the decline in Ohio’s exclusionary discipline rates can be attributed to the 2018 SAFE Act, particularly its restrictions on the use of out-of-school suspensions and expulsions for students in Pre-K through grade 3. In the years prior to the Act’s enactment, there were regularly more than 30,000 incidents of exclusionary discipline imposed on students in these early grades. As the chart below illustrates, those incidents have declined significantly since implementation.

Nevertheless, Ohio schools continue to record thousands of exclusionary discipline incidents involving their youngest students. These are children typically under the age of 10, and many of these incidents stem from disruptive or disobedient behavior rather than conduct that poses a serious threat to safety.

Ohio’s Youngest Students Are Still Being Excluded

Pre-K–3 Expulsions and Out-of-School Suspensions in Ohio Public Schools, 2024–25



Discipline categories combine several subcategories for clarity. Values are estimated where small sample sizes are suppressed.

Chart: CDF-Ohio • Source: Ohio Department of Education and Workforce • Created with Datawrapper

While the SAFE Act focused on younger children, middle school students remain the most likely to experience exclusionary discipline. This stage is a critical developmental and educational transition, as students navigate greater social awareness and identity formation while adjusting to higher instructional expectations. These factors increase the potential for behavioral challenges. As shown in the graph below, exclusionary discipline rates are highest among middle school students. Students in grades 7 through 9 experience a rate nearly double that of students in grades 10 through 12—19.4 compared to 10.1 incidents per 100 students.

Exclusionary Discipline Rates by Grade Band, 2024–25

Out-of-School Suspensions and Expulsions per 100 Students in Ohio Public Schools

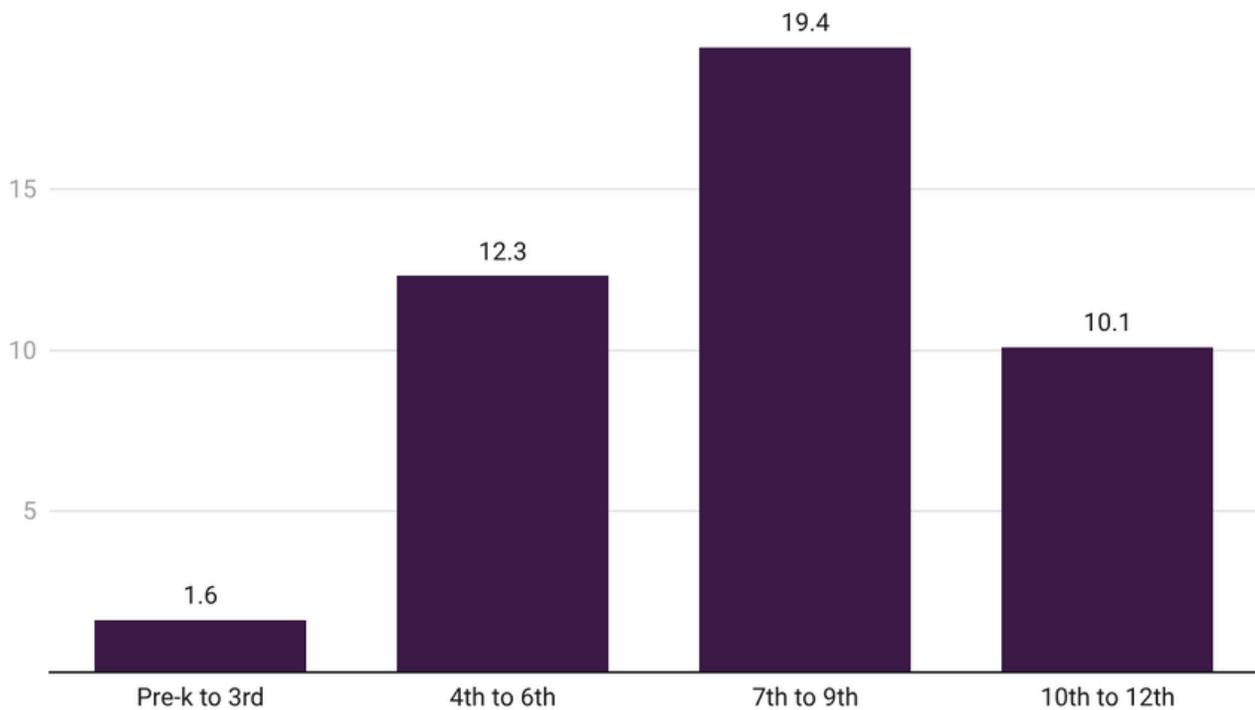


Chart: CDF-Ohio • Source: Ohio Department Of Education and Workforce • Created with Datawrapper

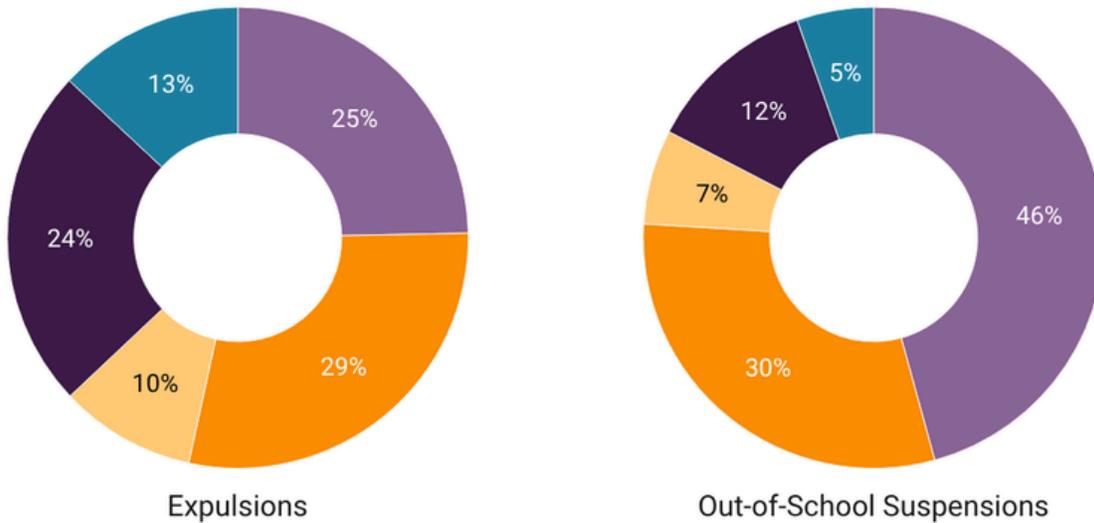
Despite efforts to limit exclusionary discipline to serious or violent offenses, these practices are frequently applied to minor misconduct. Disruptive behavior accounts for the largest share of out-of-school suspensions, with 74,849 incidents. “Disobedient” or “disruptive” behavior—broad categories subject to educator discretion—are often interpreted inconsistently, and [research](#) shows that bias can influence disciplinary decisions. Many instances may also reflect unmet mental or behavioral health needs that have intensified since the pandemic. The expansion of discretionary definitions has contributed to harsh sanctions for minor, nonviolent infractions, including dress code violations and typical adolescent behavior.

By contrast, serious bodily injury and weapons-related incidents account for a small share of overall disciplinary actions. The chart below shows that in the 2024-25 school year, one-third of out-of-school suspensions were for fighting or violence, while nearly half were attributed to disruptive behavior. The legacy of zero-tolerance policies in Ohio is evident in that nearly a quarter of expulsions involved drugs, alcohol, or tobacco.

Exclusionary Discipline by Type of Offense

Expulsions and Out-of-School Suspensions in Ohio Public Schools, 2024–25

■ Disruptive Behavior and Truancy
 ■ Fighting/Violence
 ■ Harassment/Intimidation
 ■ Drugs, Tobacco, or Alcohol Related
 ■ Other



Categories combine several subcategories for clarity. Some values are estimates where small counts are suppressed for privacy.

Chart: CDF-Ohio • Source: Ohio Department Of Education and Workforce • Created with Datawrapper

The 2024-25 discipline data indicate that exclusionary discipline is applied unevenly, with the largest disparities along racial and ethnic lines. Black, non-Hispanic students, who constitute 17% of enrollment, were four and a half times more likely to face exclusionary discipline than their White peers, who represent approximately two-thirds of the student body. Black male students were disproportionately affected, with nearly one-third experiencing suspension or expulsion in 2024-25. While male students (who are 51.5% of the student body) are more likely to be subject to exclusionary discipline (they face 67% of exclusionary discipline actions), Black female students face the third-highest rate among race/gender groups (20.4 per 100 students), more than six times the rate of White female students (3.3 per 100). The exclusionary discipline rates for Native American and Pacific Islander students are also worryingly high (see graph below); however, these are very small demographic groups (less than 0.3% of total enrollment), and their rates are subject to significant variability.

Exclusionary Discipline Rates by Race/Ethnicity and Gender, Ohio 2024–2025

Out-of-school suspensions and expulsions per 100 Students in Ohio public schools

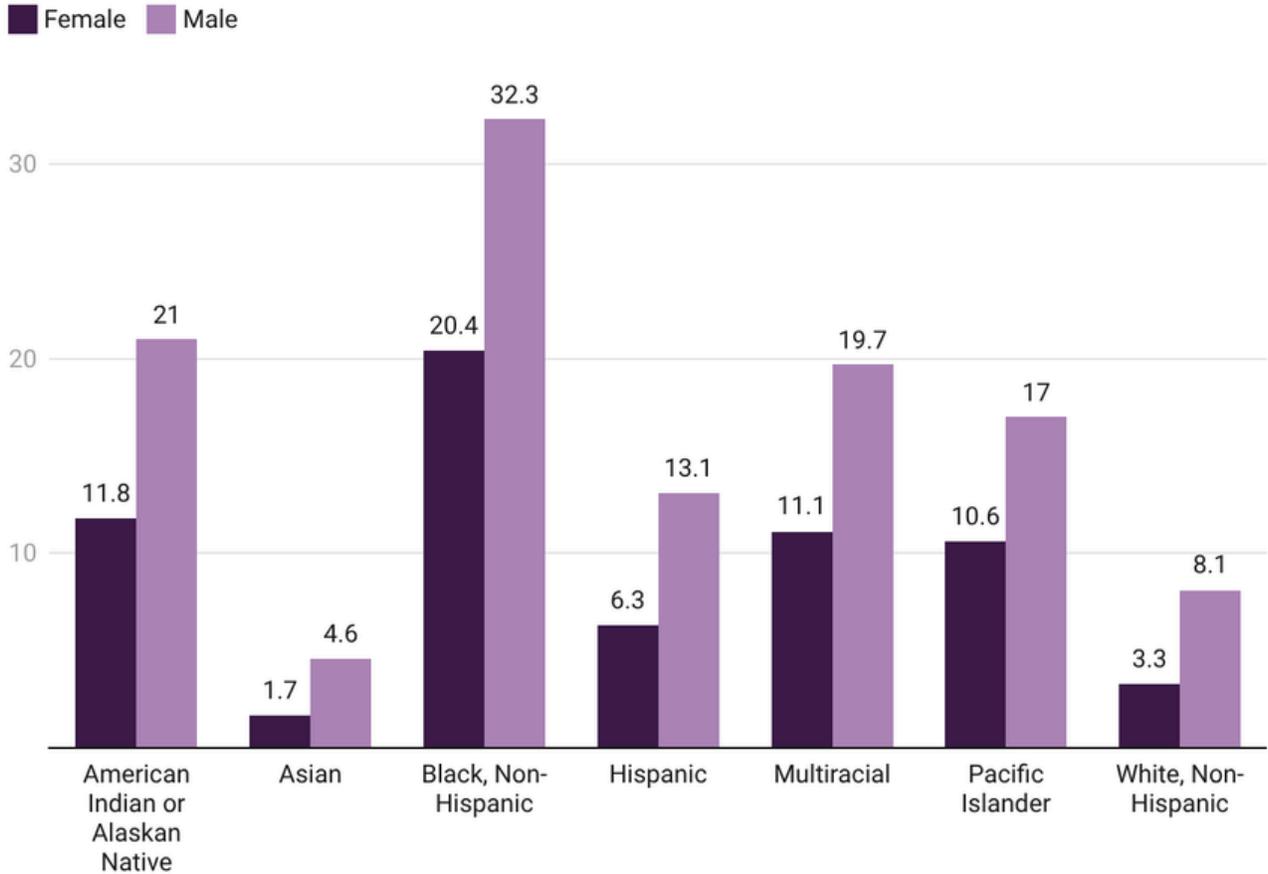


Chart: CDF-Ohio • Source: Ohio Department Of Education and Workforce • Created with Datawrapper

The graph below shows that exclusionary discipline in Ohio overwhelmingly affects students who are already marginalized. Students identified as economically disadvantaged (defined by ODEW as eligible for free or reduced-price lunch or other state and federal assistance programs) make up 62% of enrollment but account for 90% of exclusionary discipline incidents. Students with disabilities represent just over 17% of enrollment yet account for 30% of disciplinary cases. Together, these patterns highlight the arbitrary and damaging nature of exclusionary discipline, highlighting the urgent need for alternative strategies.

Exclusionary Discipline Rates by Disability Status and Economic Disadvantage, Ohio 2024–2025

Out-of-School Suspensions and Expulsions per 100 Students in Ohio Public Schools

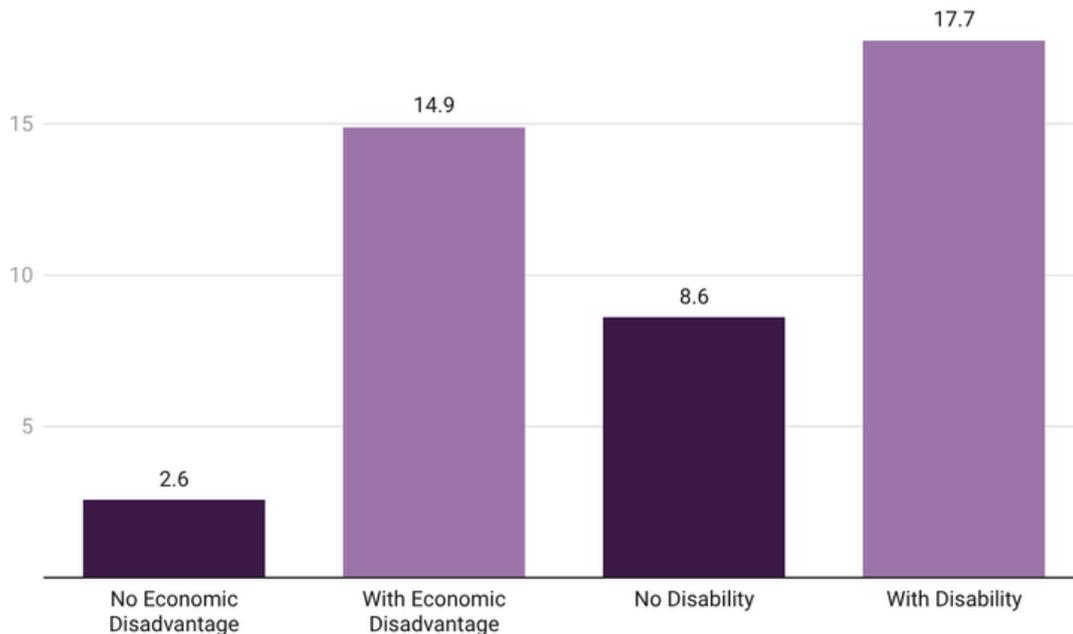


Chart: CDF-Ohio • Source: Ohio Department Of Education and Workforce • Created with Datawrapper

Addressing these disparities has proven challenging. Districts frequently lack the resources, staffing, and time required to replace exclusionary practices with consistent alternative models. Funding streams are fragmented, short-term, or insufficient to support sustained implementation. Transparent reporting on discipline data remains uneven, limiting public accountability and making it difficult to track progress or disparities. Even where reform efforts exist, they are often only partially implemented, resulting in inconsistency both within and across districts and leaving many harmful practices intact.

The work is far from complete. The state of school discipline shows that Ohio schools must continue developing and implementing evidence-based strategies to improve school climate and provide alternatives to exclusionary discipline—efforts that are as urgent now as ever. Yet, progress appears to have stalled, and recent legal and proposed administrative changes threaten to undo much of the progress achieved over the past decade.

Proposed Changes to OAC 3301-35-15

On December 5, 2025, the public comment period closed on proposed revisions to the Ohio Administrative Code governing elementary and secondary education. Among these revisions are substantial changes to [OAC 3301-35-15](#), the section that has historically defined the standards for implementing PBIS in Ohio schools. In this section, we detail the elements of the proposed revisions and assess how they would alter existing expectations for PBIS implementation.

Elimination of the PBIS leadership team

The draft rules delete all references to the PBIS leadership team. Under the current code, this team is responsible for planning, coaching, and monitoring PBIS implementation at the building or district level. Its removal eliminates the only explicitly designated body charged with ensuring fidelity, coordination, and continuous improvement of discipline practices. Without a defined leadership structure, responsibility for implementation becomes diffuse, increasing the likelihood of inconsistent practice across schools and districts.

Reframing PBIS within an undefined MTSS framework

The proposed revisions subsume PBIS implementation, required under section 3319.46 of the Revised Code, within an “integrated multi-tiered system of supports” (MTSS). While MTSS is an evidence-based, whole-child school policy, the draft rules neither define the system nor specify how it operationalizes PBIS. As a result, the language in OAC 3301-35-15 no longer clearly references the legally required PBIS framework, instead referring only to a vaguely articulated “system of supports.” This shift weakens the enforceability of PBIS requirements and creates uncertainty about what districts are expected to implement. PBIS and MTSS share the same goal of school reform, but rather than dismantling PBIS, the state should develop a fully integrated framework that combines PBIS and MTSS into a seamless system of supports and interventions.

Changes to the purpose and structure of decision-making

Under the current rule, data-based decision-making is explicitly directed toward improving “academic and behavior outcomes for all students.” The proposed language removes this purpose statement. Decision-making is still required to be data-based, but it is now framed primarily as a mechanism to “inform student needs and allocate resources” at multiple levels. While subtle, this change is notable in context. The removal of an explicit outcomes-oriented purpose aligns with the broader trend in the draft rules away from defined goals.

Weakening of PBIS standards

The existing PBIS standards specify core components of implementation, including targeted professional development; instruction in school-wide behavioral expectations; consistent systems for acknowledging and correcting behavior; teaching environments designed to reduce behavioral triggers; and family and community involvement.

In contrast, the framework described in the draft rules identifies three elements: shared leadership, professional capacity, and communication. The rule provides some clarification within these categories. "Shared leadership" includes expectations for professional development and the monitoring of interventions. "Professional capacity" is defined as knowledge of the rationale for, and application of, MTSS and PBIS, though the rules do not specify how that knowledge is to be developed or maintained. "Communication" refers broadly to processes that support engagement among students, families, and personnel, including communication of school-wide behavioral expectations.

What is striking in this transition is what the draft rules no longer specify. Detailed professional development requirements are omitted, even though, in our conversations with school administrators, training was consistently identified as central to the successful implementation of innovative pedagogical and disciplinary frameworks. Expectations that teaching environments actively minimize behavioral triggers are removed entirely. Direct requirements for family and community involvement are replaced with broad language about communication and engagement. The net effect is a shift from concrete, actionable standards to general principles, leaving districts without clear operational guidance for effective implementation.

Deletion of mandated professional development requirements

The draft rules fully delete paragraph C, which previously provided detailed direction on professional development related to PBIS implementation. That paragraph required participation in a PBIS-focused professional development event at least once every three years, specified that the PBIS leadership team would provide the training, and mandated the development of an implementation plan. It also required districts to maintain records documenting completion of these trainings.

Paragraph C further specified training content, including an overview of PBIS, concrete implementation strategies, relevant data collection practices, and an emphasis on consistency in both discipline application and communication of expectations. The proposed revisions eliminate all of these requirements, as well as the directive to establish continuous training structures capable of providing ongoing coaching and supporting implementation with fidelity.

Removal of monitoring and reporting requirements

Finally, the draft rules delete the requirement to monitor and report on “the implementation of this rule and the district’s policy on positive behavior intervention and supports,” along with any associated recordkeeping obligations. This change removes the primary mechanism through which the state could assess whether PBIS was being implemented as intended, further weakening accountability and oversight.

Implications for implementation and discipline outcomes

Viewed collectively, the proposed revisions to OAC 3301-35-15 represent a fundamental shift away from implementation-driven discipline policy toward a framework defined primarily by vague principles and minimal requirements. By eliminating the PBIS leadership team, removing detailed professional development mandates, and deleting monitoring and reporting obligations, the draft rules dismantle the core infrastructure that previously supported consistent and faithful implementation across districts.[1]

The reframing of PBIS within an undefined system of supports further compounds these risks. Without clear standards, operational definitions, or accountability mechanisms, districts are left to interpret legal requirements independently. In practice, this is likely to produce uneven implementation.

The removal of PBIS requirements increases the likelihood that schools will default to reactive and exclusionary responses, particularly in the absence of sustained training and coaching. Given Ohio’s persistently high rates of exclusionary discipline, weakening the very mechanisms intended to address these patterns risks entrenching, rather than reducing, inequitable outcomes.

Finally, the proposed rules undermine the state’s ability to evaluate progress. Without required monitoring, reporting, or recordkeeping, neither the Department of Education and Workforce nor the public will have a clear basis for assessing whether discipline reforms are being implemented or whether they are effective. This loss of transparency further insulates policy changes from evidence-based correction and limits opportunities for continuous improvement.

[1] The authors communicated with ODEW to request an official statement on the rationale for the proposed revisions; while ODEW acknowledged receipt of these inquiries, as of the date of publication, they have not provided substantive responses to the questions posed.

Recommendations

The situation is not irreparable. Ohio retains substantial institutional knowledge, trained personnel, and implementation experience in evidence-based alternative discipline practices developed over years of reform. The state has the capacity to address the pernicious effects of exclusionary discipline that continue to shape the experiences of children across Ohio and to recognize students' unmet academic, social, and behavioral health needs for what they are—rather than punishing children for circumstances beyond their control.

When school systems prioritize punishing students who fail to overcome non-academic barriers instead of addressing the barriers themselves, they fall short of creating the supportive, safe, and welcoming environments that all children deserve.

With timely and coordinated action from legislators, advocates, and education leaders, Ohio can build on its existing foundation rather than allowing hard-won gains to quietly unravel. Doing so requires a renewed commitment to policies and practices that elevate Whole Child supports, strengthen school climate, and limit the use of exclusionary discipline to very rare circumstances. To advance educational equity and improve outcomes for all Ohio students, the state must consider the following recommendations:

Reaffirm, expand, and fully fund the SAFE Act

Ohio should reaffirm the intent of the SAFE Act to limit exclusionary discipline to serious and violent offenses. The Act has been partially successful in reducing out-of-school discipline for students in prekindergarten through third grade, and lawmakers should expand its protections to additional grade levels, particularly all elementary-age students. In addition, the SAFE Act should be amended to include dedicated funding to support school counselors and other social and emotional supports necessary to fully implement the law and reduce reliance on exclusionary discipline statewide.

To ensure effective implementation, the Ohio Department of Education and Workforce must continually investigate occurrences that violate the prohibition on unnecessary exclusionary discipline and hold districts accountable. This process should model restorative practices by engaging administrators in discussions about why exclusionary discipline continues to be used and identifying alternative solutions.

Restore and clarify standards for evidence-based discipline frameworks

The Ohio Administrative Code should clearly articulate expectations for the implementation of a fully integrated framework that combines PBIS and MTSS into a seamless system of evidence-based supports and interventions, including minimum standards for fidelity, monitoring, and continuous improvement. Removing this specificity risks undermining consistency and effectiveness across district.

Invest in sustained professional development

Effective implementation of restorative practices and other evidence-based discipline frameworks requires time, space, and highly trained personnel. Schools need staff such as intervention specialists, behavior specialists, school psychologists, counselors, social workers, and aides to provide one-on-one mentoring, support groups, and other individualized supports. Yet, with the Fair School Funding Plan underfunded, many districts lack sufficient resources to meet these needs. In our conversations with educators, we consistently heard that much of this critical work depends on already overtaxed staff and goes unrecognized. Policymakers must build on the Fair School Funding Plan to provide dedicated funding and resources that support educators in delivering both high-quality instruction and behavioral support. This work should be recognized, remunerated, and actively encouraged, ensuring staff have the capacity and incentive to sustain positive school climates without relying on exclusionary discipline.

Improve transparency and accountability in discipline data

Ohio should continue to collect and publicly report disaggregated discipline data and use it to identify patterns of overuse, disparities, and areas for targeted support. Data should be publicly available and used both for compliance and to guide resource allocation.

Center families, communities, and student supports to strengthen school climate

Parents and caregivers play a critical role in fostering a supportive and equitable school climate. They can serve as effective partners and leaders within the school community, helping shape policies and practices that meet students' needs. Schools should implement structured opportunities for meaningful engagement, such as listening sessions, focus groups, and advisory councils that include administrators, teachers, students, and families. These forums can ensure that the voices of parents and children are heard by ODEW and the General Assembly, informing decision-making around disciplinary policies and practices.

To fully address student needs, schools must also invest in community- and school-based supports:

- **Community Learning Center Model:** State funding should expand access to school-based and community-connected health care and social services. Full implementation of this model requires additional investments for specialized staff and partnering agencies to provide comprehensive services to students and families.
- **Expand School Medicaid:** Ohio should enable schools to draw down more federal Medicaid funding to expand health services, reaching more students and building capacity amid workforce shortages in school support staff.
- **Free School Meals for All:** The state should pass legislation allowing all schools to provide healthy meals at no cost to every student, ensuring children are well-nourished and able to fully engage in learning.

Conclusion

To create truly supportive and equitable school environments, all disciplinary practices should be grounded in the Whole School Whole Community Whole Child frameworks in which Ohio has already invested. In particular, MTSS and PBIS are evidence-based and proven to foster positive school climates where students can thrive academically and socially. These frameworks can be strengthened by integrating restorative practices, which provide alternatives to exclusionary discipline.

Ohio has the knowledge, experience, and tools to create schools where all students can thrive. The evidence is clear: exclusionary discipline is overused, inequitable, and fails to address the root causes of student behavior. By embedding restorative practices within Whole Child frameworks, investing MTSS and PBIS implementation, and heeding the recommendations outlined in this report, lawmakers, educators, and community leaders can transform school climate across the state.

The time to act is now. Policymakers must provide the funding, resources, and guidance necessary to sustain these evidence-based approaches, support educators and staff, and ensure meaningful engagement with families and communities. By doing so, Ohio can move beyond punitive models, build positive and inclusive school environments, and give every child the opportunity to flourish.



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