BE HER RESOURCE

A TOOLKIT ABOUT SCHOOL RESOURCE OFFICERS AND GIRLS OF COLOR

Monique W. Morris | Rebecca Epstein | Aishatu Yusuf

NOTE FROM THE AUTHORS

This toolkit **should not be misinterpreted as an endorsement of the need for police in our schools**.

To the contrary, in a more ideal world — one in which schools implement a robust range of responses to students, especially those who exhibit symptoms of trauma — law enforcement would not be a consistent presence in schools, rendering reports like this one unnecessary.

Today, however, that presence is very real. The number of officers and the scope of their interventions in students' lives has only increased, which has had a unique impact on girls of color.

Given the current environment, we saw a need for a constructive research project that would gather input from law enforcement and girls of color and provide guidance to improve interactions between them, with the ultimate goal of reducing the disproportionate rate at which girls of color are drawn into the juvenile justice system.

ABOUT THE AUTHORS AND AUTHOR ORGANIZATIONS

The Georgetown Law Center on Poverty and Inequality works with policymakers, researchers, practitioners, and advocates to develop effective policies and practices that alleviate poverty and inequality in the United States. One of the Center's main areas of work is its Project on Marginalized Girls, which conducts research and develops national, state, and local policy and program recommendations to support and serve low-income girls and girls of color. The Center partners with nonprofit organizations and other thought leaders to host national conferences, produce in-depth reports, and participate in national coalitions and working groups.

The National Black Women's Justice Institute (NBWJI) is a non-profit organization focused on reducing racial and gender disparities across the justice continuum affecting cisgender and transgender Black women, girls, and their families, by conducting research, providing technical assistance, engaging in public education, promoting civic engagement, and advocating for informed and effective policies. NBWJI conducts research independently and in collaboration with a number of domestic universities and organizations on Black women and girls in the U.S. who are impacted by criminalization and the criminal legal system as a function of their intersecting identities. Our work also includes training and technical assistance to public agencies that are working to improve outcomes for women and girls impacted by criminalization.

The authors of this report are:

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EXECUTIVE SUMMARY

School-based police officers, known as school resource officers (SROs), have become a common and growing presence in schools across the nation. The presence of law enforcement in school, while intended to increase school safety, has also been associated with increased surveillance and criminalization of students — especially students of color. Little data exists, however, on the experiences of girls of color. To fill this gap, the Georgetown Law Center on Poverty and Inequality and the National Black Women's Justice Institute engaged in research to examine the relationship between girls of color and SROs.

This toolkit presents the findings that emerged from focus groups and interviews that we conducted with SROs and girls of color in the South, a region that is relatively unexamined in such research. They paint a complex portrait of interactions and relationships with unprecedented depth.

KEY FINDINGS INCLUDE:

- **SROs described their most important function as ensuring safety and responding to criminal behavior**, yet they report that educators routinely ask them to respond to disciplinary matters.
- **SROs do not receive regular training or other supports specific to interactions with girls of color**.
- **SROs attempt to modify the behavior and appearance of girls of color to conform with mainstream cultural norms,** urging them to act more "ladylike."
- **Girls of color primarily define the role of SROs as maintaining school safety**. They define their sense of safety as being built on communication and positive, respectful relationships with SROs.
- **African-American girls, in particular, identify racial bias as a factor in SROs' decision-making process.** African-American girls perceive that their racial identity negatively affects how SROs respond to them on campus.

Based on these findings, this toolkit presents guiding principles and policy recommendations designed to improve interactions between girls of color and SROs, with the ultimate goal of reducing these girls' disproportionate rates of contact with the juvenile justice system.

KEY RECOMMENDATIONS FOR SCHOOL DISTRICTS AND POLICE DEPARTMENTS INCLUDE:

- Clearly delineate law enforcement roles and responsibilities in formal agreements
- Collect and review data that can be disaggregated by race and gender
- Implement non-punitive, trauma-informed responses to girls of color
- Offer specialized training to officers and educators on race and gender issues and children's mental health

INTRODUCTION

Over the past several decades, police officers have become a familiar and growing presence in our nation's schools. Initially deployed in response to school shootings, these officers — known as school resource officers (SROs) — have, over time, become increasingly involved in students' everyday lives. While the presence of law enforcement on campus signals a prioritization of student safety, it has also produced undesired consequences associated with the surveillance and criminalization of youth. Most significantly, it has been shown to result in an increase in arrests[1] and other forms of student contact with the juvenile justice system — particularly for students of color.[2]

As awareness of the "school-to-prison pipeline" has increased, concerns have largely centered on boys of color. This toolkit provides a counterpoint to this narrative by focusing on girls of color, who also experience disproportionate contact with school law enforcement compared to their white peers, but have their own, unique story rooted in their gender and race. Given the significant disparities in punitive treatment, it is critical to improve interactions between SROs and girls of color. SROs are often students' first point of contact with the juvenile legal system, and these officers wield an extraordinary amount of discretion. The result has been a particularly significant impact on the vulnerable populations that are most at risk of being criminalized in schools.

To meet this urgent need, the Center on Poverty and the National Black Women's Justice Institute conducted participatory research funded by the Open Society Foundations, with additional support from the NoVo Foundation, the Annie E. Casey Foundation, and the Communities for Just Schools Fund, to examine the relationship between SROs and girls of color. We conducted focus groups, telephone interviews, school visits, a roundtable, and a town hall, all of which engaged the perspectives of both law enforcement and girls of color. Our work focused on the South, a region often overlooked in comparable research. Our aim was to identify challenges and successes in school-based interactions and to propose collectively developed steps toward solutions.

This toolkit is the result of that research. It is designed to inform police departments and school systems about the perspectives we gained from SROs and girls of color about their exchanges in school: the challenges and frustrations each group faces in approaching the other, the successes they report, and their ideas about opportunities for reform and development. In its pages, we provide our research findings, policy recommendations, and additional resources that are intended to serve as a springboard to delve deeper into this important topic.

We offer this toolkit as a critical first step: a basis for the further development of research, analysis, and interventions to improve school experiences for girls of color.
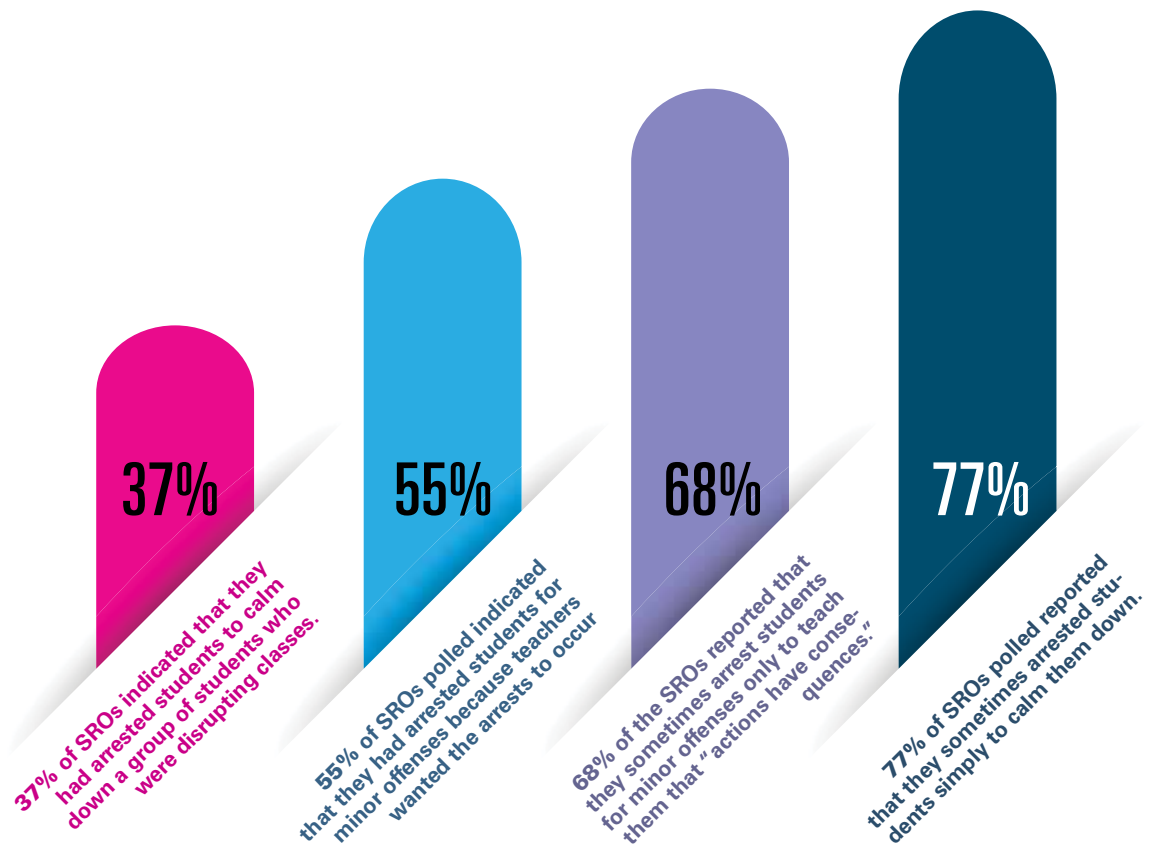
LEGAL FRAMEWORK

OVERVIEW

A school resource officer (SRO) is typically a sworn career law enforcement officer who is assigned to work in schools.[3] The presence of SROs has increased in recent years, partly in response to high-profile school shootings[4] and the rise of zero-tolerance school disciplinary policies.[5] As a result, although there were fewer than 100 SROs in the 1970s,[6] that number grew to 14,380 full-time and 16,330 part-time SROs in public schools in 2013-2014, according to the National Center for Education Statistics.[7] According-ing to data collected by the U.S. Department of Education for the 2013-2014 school year, SROs were working in 24 percent of elementary schools and 42 percent of high schools across the country[8] and are more often present in schools that have high populations of Black or Latino students.[9] In December 2016, a White House analysis of this data noted that the rising number of SROs in these schools has not been matched by an increase in school counselors:

> Black students are roughly 11 percent more likely than white students to have a school law enforce-ment officer (SLEO) in their school, but they are no more likely to have a guidance counselor. His-panic students are only slightly less likely to have an SLEO in their school but are 10 percent less likely to have a guidance counselor. And minorities are between roughly 20 and 40 percent more likely to be one of the 1.6 million students who attend a school where there is a school law enforce-ment officer but no guidance counselor.[10]

SRO DISCRETION IN USING AUTHORITY — SNAPSHOT FROM 2013 STUDY OF SROs

37% 37% of SROs indicated that they had arrested students to calm down a group of students who were disrupting classes.

55% 55% of SROs polled indicated that they had arrested students for minor offenses because teachers wanted the arrests to occur

68% 68% of the SROs reported that they sometimes arrest students for minor offenses only to teach them that "actions have conse-quences."

77% 77% of SROs polled reported that they sometimes arrested stu-dents simply to calm them down.

Source: Kerrin C. Wolf, *Arrest Decision Making by School Resource Officers,* YOUTH VIOLENCE & JUV. JUST. 1, 6 (2013) (noting that "while these responses do not indicate how often SROs face these particular scenarios, they do indicate that SROs exercise discretion when facing a variety of circumstances that may lead to an arrest.").

DUTIES

The role of an SRO is to enforce criminal law and maintain safety in schools.[11] Yet they have wide discretion in carrying out their duties,[12] and the distinction between enforcing criminal law and school disciplinary codes has become blurred in many schools.[13] In fact, in a 2013 study, a significant number of SROs reported that they arrest students just to calm them down.[14] The result: violations of school rules, once handled by administrators, can now lead students into the juvenile justice system.[15]

GUIDANCE

No uniform legal framework specifically limits or guides SROs' actions beyond minimum federal standards,[16] and it is extremely difficult to mount legal challenges.[17] Although contracts between schools and police departments — known as Memoranda of Understanding (MOUs) — can provide a baseline of guidance and standards,[18] a majority of states do not require such agreements, and agreements that do exist often fail to clarify roles.[19]

21 STATES & WASHINGTON D.C. REQUIRE MEMORANDA OF UNDERSTANDING BETWEEN SCHOOL DISTRICTS AND POLICE DEPARTMENTS.*

Required

Not Required

Encouraged
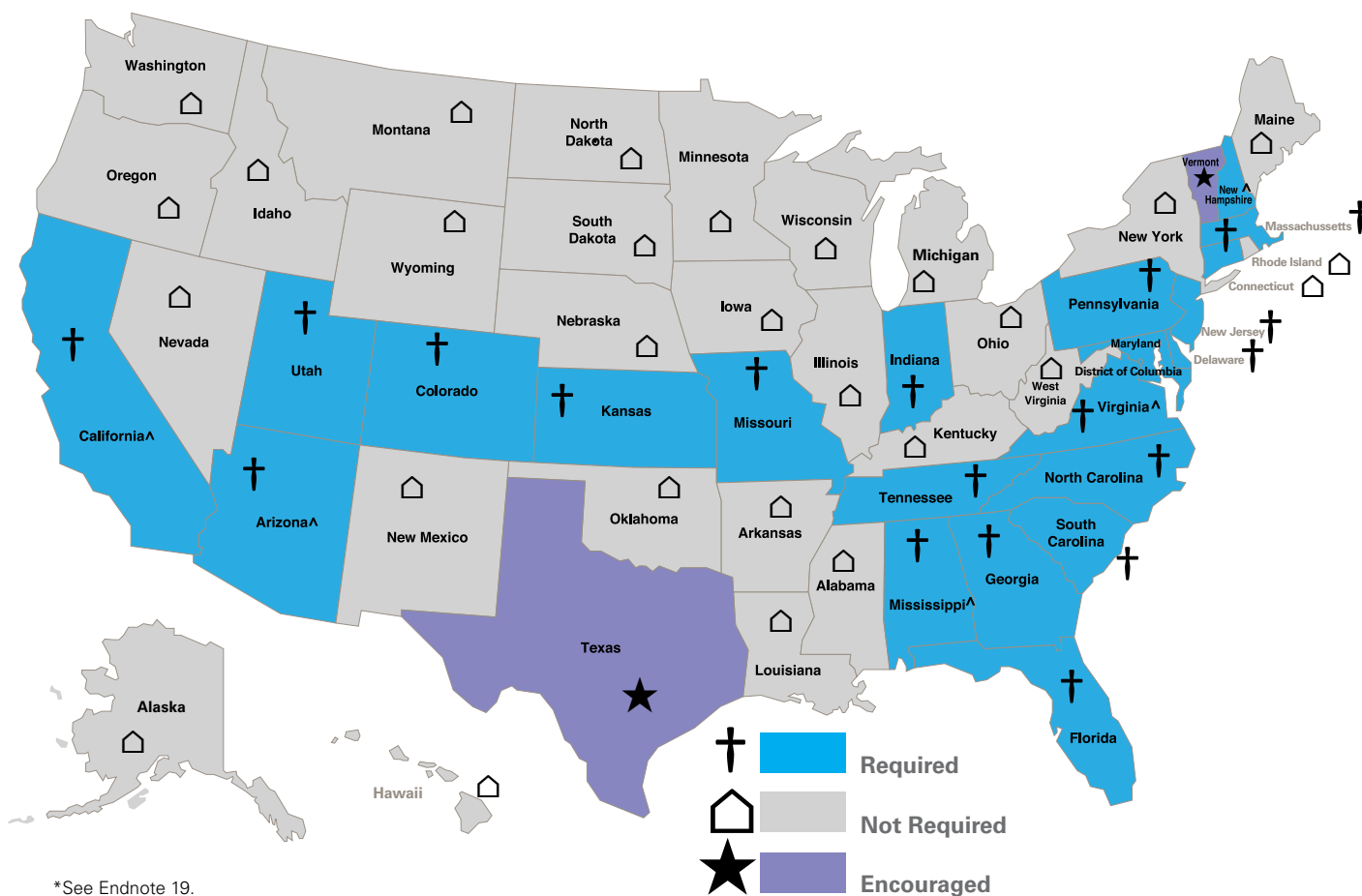
*See Endnote 19.

^ These 5 states require MOUs only if the SRO program is state funded.

TRAINING

Most states do not require youth- or school-related training for SROs.[20] Although the COPS (Community Oriented Policing Services) Office at the U.S. Department of Justice requires training by NASRO (National Association of School Resource Officers)[21] for federally funded SROs,[22] these grants cover a minority of school-based police.[23]

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19 STATES & WASHINGTON D.C. REQUIRE SROs TO BE TRAINED ON YOUTH-SPECIFIC LAW ENFORCEMENT*

*See Endnote 20.

Legend:
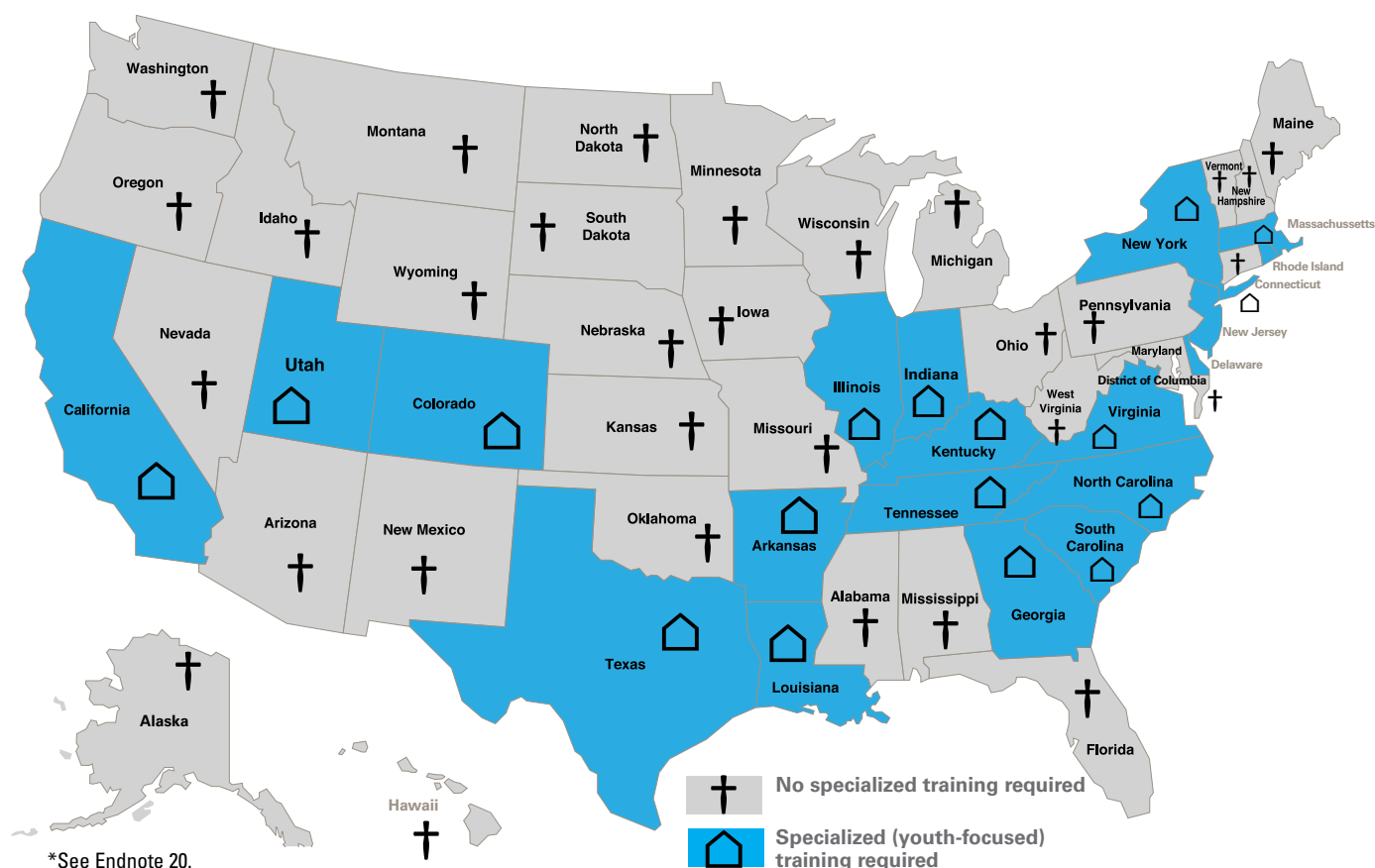† No specialized training required
⌂ Specialized (youth-focused) training required

SROs AND STUDENT INVOLVEMENT IN THE JUVENILE JUSTICE SYSTEM

Many school disciplinary categories are based on subjective standards[24], such as the offense of "willful defiance."[25] Some states have enacted laws that criminalize such misbehavior. According to a 2016 analysis published in *The Atlantic*, twenty-two states[26] have made it a crime to disrupt school.[27] Under these laws, SROs have charged children for behavior such as wearing too much perfume.[28] "Disturbing-school" laws gained national notoriety in 2015,* when a sheriff's deputy flipped the desk of a girl

*In 2016, the Richland County (SC) Sheriff's Department (RCSD) reached a voluntary agreement with the U.S. Department of Justice, Office of Justice Programs Office of Civil Rights that reflects a first step toward taking "comprehensive action" to address concerns believed to be associated with the "school-to-prison pipeline." The agreement includes a commitment from RCSD to collect and analyze data, develop policies that minimize student arrest, implement annual professional development and training, work collaboratively with schools to develop an MOU, and establish a working group with parents and key community stakeholders. The full Compliance Review is available at https://ojp.gov/about/ocr/pdfs/RCSD-SRO-ComplianceReview-08102016.pdf.

of color while she was still sitting at it and dragged her across the floor because she refused to leave class.[29] The girl was charged with disturbing school,[30] and statistics indicate that she was more likely than not to end up in the court system: experts estimate that about 55 percent of cases like hers ended up in juvenile court in South Carolina,[31] where 29,000 disturbing-school referrals were made to the state Department of Juvenile Justice between 2001-2016.[32]

SROs' broad discretion in enforcement activities can result in sending students into the juvenile justice system instead of the principal's office.[33] According to recent reports, for example, SROs have arrested students for cursing and yelling.[34] A federal court even upheld an SRO's decision to arrest and handcuff a 13-year-old student for "repeatedly burping, laughing, and leaning into the classroom[, which] stopped the flow of student educational activities, thereby injecting disorder into the learning environment."[35] While not all charges result in convictions, many do: children have been **convicted and sentenced** for behavior identified by SROs that include hitting another student or engaging in a prank involving foul-scented spray.[36]

In addition to the factor of subjective determinations, SROs' enforcement actions can also result in students' deeper involvement in the juvenile justice system by means of escalation. For example, if conflict ensues in the course of an SRO's enforcement of a minor disciplinary violation, that student may be arrested for disorderly conduct.[37]

As a result of these and other factors, schools with SROs report higher rates of student contact with the juvenile justice system — particularly for low-level offenses — than schools without SROs.[38] In total, according to the U.S. Department of Education, educators arrested approximately 20,591 girls during the 2013-2014 school year. While these statistics are startling, Black girls face particularly serious disparities. For example, Black girls are more than 2.6 times more likely to be referred to law enforcement as white girls, and almost four times as likely to be arrested (see infographic on this page).[39]

RATES OF ARREST AND REFERRAL TO LAW ENFORCEMENT

4X

Black girls are almost 4x more likely to be arrested in school than white girls.

White girls

2.6X

Black girls are close to 3x more likely to be referred to law enforcement than white girls.

White girls

2.7X

Latina students are close to 3x more likely to be arrested in elementary school than white girls.

White girls

Source: Misha Inniss-Thompson, Summary Of Discipline Data For Girls In U.S. Public Schools: An Analysis From the 2013-14 U.S. Department of Education Office for Civil Rights Data Collection, National Black Women's Justice Institute (2017).

CONSEQUENCES OF STUDENT CONTACT WITH THE JUVENILE JUSTICE SYSTEM AND LEAVING SCHOOL ACCORDING TO ACLU STUDIES

STUDENTS WHO HAVE BEEN ARRESTED AT SCHOOL (MASS.)

3X more likely to drop out[41] than their peers

STUDENTS REQUIRED TO APPEAR IN COURT (WASH.)

4X as likely to leave school[42]

STUDENTS WHO DROP OUT OF HIGH SCHOOL (MASS.)

8X more likely to end up in the criminal justice system

Source: Robin L. Dahlberg, Am. Civil Liberties Union of Mass., Arrested Futures: The Criminalization of School Discipline in Massachusetts' Three Largest School Districts 34 (2012); Am. Civil Liberties Union of Wash. Found., Students, Not Suspects: The Need to Reform School Policing in Washington State 2 (2017). *Note:* The term "dropout" is a direct quote from this study. The authors of this report refrain from using this term, because it can imply that the student voluntarily chose to leave school without taking into consideration the context for that decision and the external factors that affect a young person's sense of safety and ability to thrive in school.
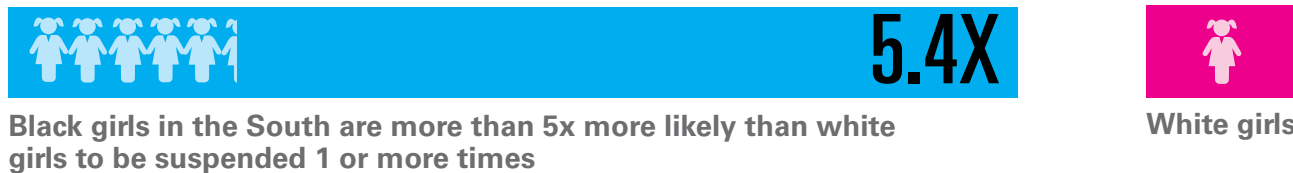
The consequences for students who come into contact with the justice system are serious. Arrested students are more likely not to complete school, which may result in the loss of workforce development and job opportunities, and they face an increased risk of involvement in crime, poor physical and mental health, and potentially deeper involvement in the juvenile justice system.[40]

The data is clear: girls of color are arrested and suspended from school at higher rates than white girls.[43] In the 2013-2014 school year, for example, Indigenous/Native American girls were suspended more than three times as often as white girls, and Latina students were suspended 1.6 times as often as their white peers.[44] African-American girls were suspended over five times as often as white girls[45] — and twice as often as white boys.[46] African-Americans comprised 15.6 percent of female students, but accounted for 28.2 percent of girls referred to law enforcement and 37.3 percent of girls arrested on campus.[47]

Data also shows that discretionary offenses[48] such as violating dress codes[49] uniquely affect Black girls. For example, one Massachusetts charter school repeatedly penalized Black girls for violating a rule against hair extensions, including banning them from sports teams and prohibiting them from attending prom — though the same school did not discipline white girls whose dyed hair violated rules against hair coloring.[50] Yet, in contrast, students are charged at nearly equal rates for objectively determined offenses, with white students charged at slightly higher rates.[51]
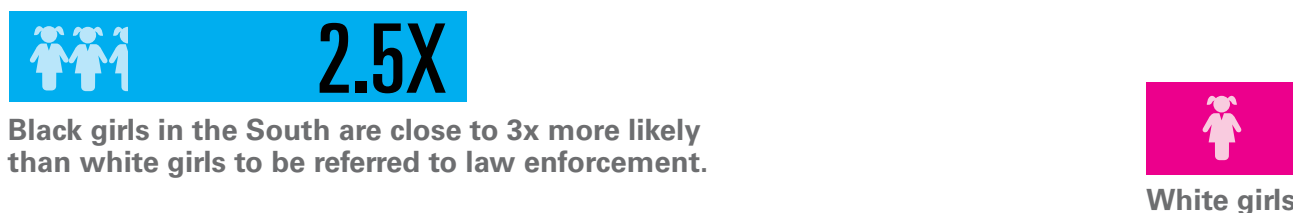
SNAPSHOT OF THE SOUTH

SUSPENSIONS

5.4X

White girls

Black girls in the South are more than 5x more likely than white girls to be suspended 1 or more times

ARRESTS

4X

White girls

Black girls in the South are 4x more likely than white girls to be arrested

REFERRALS TO LAW ENFORCEMENT

2.5X

White girls

Black girls in the South are close to 3x more likely than white girls to be referred to law enforcement.

Source: Misha Inniss-Thompson, SUMMARY OF DISCIPLINE DATA FOR GIRLS IN U.S. PUBLIC SCHOOLS: AN ANALYSIS FROM THE 2013-14 U.S. DEPARTMENT OF EDUCATION OFFICE FOR CIVIL RIGHTS DATA COLLECTION, National Black Women's Justice Institute (2017).

 As described above, contact with the juvenile justice system harms children's long-term health and employment prospects. However, harsh school discipline may also have less visible effects on girls, including behavioral challenges, mistrust of adults and authority figures, and loss of interest in school.[52]

* * *

Despite these areas of concern, data on the race and gender of students who interact with SROs and of SROs themselves is rarely collected,[53] and guidance to improve SROs' interactions with girls of color remains sparse. Our research uncovered no SRO training curricula specifically related to girls of color, and few data collection protocols that would provide schools and police departments with sufficient information to expose inequitable patterns or practices involving girls of color and to hold officials accountable.[54] We undertook the research presented in this report to begin to fill this gap.

STUDY DESCRIPTION

The National Black Women's Justice Institute (NBWJI) and the Georgetown Law Center on Poverty and Inequality (Center on Poverty) conducted a participatory, appreciative inquiry to examine the relationship between girls of color and school resource officers (SROs).[55] We worked with girls of color, law enforcement, policymakers, and other experts to better understand SROs' interactions with girls of color and how they can engage in more effective safety practices that reduce disproportionate rates of school discipline and contact with the juvenile justice system. Our research was comprised principally of focus groups with girls of color and SROs, as well as telephonic interviews with school-based officers. Our questions began by examining how each group interprets the concept of school safety and inviting participants to cooperatively develop a definition that met their vision and practice.

DEFINITIONS

SROs. The structure of SRO programs varies widely (see Legal Framework section of this toolkit). This report uses the term SROs to refer exclusively to officers labeled as such by their school districts, and who are assigned to work in specific schools.[56]

Girls of color. Girls of color are defined as youth under the age of 18 years old who self-identify as female and as a member of the following racial/ethnic groups (alone or in combination with another racial/ethnic identity): Black/African-American, Latinx American, Asian Pacific American, and/or Indigenous/Native American.

OBJECTIVE

The primary objective of this research was to uncover the perceptions that SROs and girls of color have of each other, especially as they relate to the collective construction of school safety and identifying success and challenges in practice. As a result, this report sets forth officers' and girls' perspectives on interacting with each other, and girls' perceived sense of safety.

METHODS

Focus groups were at the center of this inquiry. We conducted three focus group sessions with SROs and four focus group sessions with girls of color. Researchers were not involved in the selection of participants in these focus groups.

SRO and other law enforcement participants (N=57) were asked to discuss their experiences working with girls of color, their general observations regarding interactions with girls of color, and to suggest policies and practices that could reduce contact between girls of color and the juvenile justice system. SRO participants were selected by national or local police agency leadership. All officers worked in public schools, from elementary to high school level; a small number of officers were stationed in nontraditional public schools.

Participants who were girls of color (N=28) were selected by program directors who worked directly with them. These students had all interacted with SROs, and they were asked to discuss their experiences, their general observations regarding contact between girls of color and law enforcement, and to suggest ways — in and out of school — that contact with the juvenile justice system could be reduced.

Researchers also conducted one town hall, a roundtable, seven in-depth individual interviews with SROs, and six other interviews with key stakeholders who worked in the jurisdictions in which the focus groups were located.

Qualitative data was primarily collected from focus groups and individual interviews. Focus groups and interviews were conducted in urban communities in Alabama, Florida, and Georgia. Telephonic and in-person interviews were conducted with law enforcement and education stakeholders from urban and suburban districts in Alabama, California, Missouri and Washington, DC. One town hall meeting was conducted in Florida.

Participants were offered an optional survey at the conclusion of their participation in focus groups and interviews to capture any additional thoughts on the topic. Some participants were also provided an opportunity to submit additional comments via electronic survey to the research team.

Data was analyzed using the grounded theory analysis (Glaser & Strauss, 1967), in which data is reviewed and analyzed for emergent themes. For purposes of this study, the qualitative data from focus groups and interviews was analyzed using a technique associated with phenomenological research, in which significant statements are shared in order to generate "meaning units" and "essence" descriptions.[57] Phenomenology is the "reflective analysis of life-world experiences" and is recommended for studies seeking to examine the meaning of human experiences.[58] As a phenomenological study, researchers sought to uncover the essence of the lived experiences of girls of color and law enforcement officers in schools.

KEY CHARACTERISTICS OF PARTICIPANTS

Participants in the SRO focus groups included SROs and other law enforcement representatives who were actively engaged in school-related work, including police officers who had worked to train SROs. Officer-participants were primarily Black/African-American[59] (N=55, 96%) and male (N= 51, 89%). Participation was voluntary and officers ranged in years of experience and rank, from officer to chief.

Participants in focus groups for girls of color attended or had attended schools with a consistent SRO presence. The majority of girls (N=25, 89%) who participated in the study identified as Black/African-American. The majority of girls who participated in the study also signaled that they attended racially isolated schools.[60] The girls interviewed ranged in age from between 13-18, but all attended high school.

LIMITATIONS

This study is limited by its size and scope. The primary location for this research was in urban school districts, which limits its applicability to suburban, tribal, and rural areas. As such, this research is not generalizable and results should be interpreted within its limitations. However, this research may be transferable to the extent that the findings may be relevant in other contexts with similar conditions.

Further, there are limitations associated with the use of interviews as a data collection method, which include the following: information is filtered through the eyes of the participant, the researchers' presence may cause bias, and all participants (i.e., interviewees) are not "equally conversant, articulate, or perceptive."[61] Additionally, the current study was not a racially comparative study and therefore did not include interviews with girls who identified as white. As a result, this report does not include a comparison between girls of color and white girls. Similarly, because most officer-participants identified as African-American, the perspective of this group is predominant in this report. However, in participatory action-oriented research, the first-person perspective of the affected population (in this case, SROs and girls of color) is paramount. Thus, the goal of this project is to provide recommendations that are responsive to these participants' concerns and observations.

RESEARCH FINDINGS

KEY FINDINGS

SCHOOL RESOURCE OFFICERS (SROs)

On Roles and Responsibilities

- **SROs primarily define their role as ensuring safety in school — which they define broadly to include a positive school environment, healthy relationships with students, and keeping students in school — not responding to disciplinary infractions.** SROs described their most important function as ensuring safety in response to violence and criminal activity by students and from external threats. Most SROs stated that their role did not include responding to disciplinary matters.

- **Educators routinely request SROs to enforce discipline.** SROs stated that educators rely on them to enforce school rules, rather than limiting their engagement to incidents involving violations of the law**.**

- **SROs do not receive regular training or other supports specific to interactions with girls of color**. No participants in our study had received training specific to considerations relevant to girls of color. Participant SROs recognized this as a gap they wished to close in order to respond more effectively to girls of color.

- **SROs do not receive information about community resources that could offer support to girls of color as alternatives to discipline, which leads them to rely on** *ad hoc* **informal networks.** SROs described resorting to personal resources, including family members and close colleagues, because of the dearth of formal information and professional development opportunities to provide them with culturally competent and gender-responsive community-based resources for girls of color.

On Race, Gender, and Sexuality

- **Racial tensions in local communities appear to affect the dynamics between SROs and girls of color**. SROs — particularly those who identify as white — believe that students of color, including girls, have preconceived opinions of SROs as inherently biased that are formed by their experiences with community officers. Others, however, stated that positive interactions in school can help change perceptions of local police.

- **SROs attempt to modify the behavior and appearance of girls of color to conform with mainstream cultural norms regarding gender roles and sexuality.** Participants discussed urging girls to present themselves in ways that the officers perceived to be more respectable and "ladylike."

GIRLS OF COLOR

On SRO Roles and Responsibilities

- **Girls of color primarily define the role of SROs as maintaining school safety.** Girls view SROs' function as keeping them safe from student-based violence and potential external threats.

- **Girls of color view relationship-building as essential to officers' effectiveness in maintaining safety.** Girls indicated that officers most effectively establish a sense of safety by developing positive, respectful relationships with students as individuals.

- **Girls of color suggest that communication with SROs is key to their sense of safety.** Participants emphasized that improved communication would lead SROs to better understand their perspectives and experiences that, in turn, would help build a sense of safety in school.
- **Girls of color attribute some punitive responses to broader external factors that they believe SROs do not fully recognize.** Girls of color described that SROs fail to recognize underlying structural factors and issues in their families or broader community that affect their behavior and relationships in school.

On Race, Gender, and Sexuality

- **African-American girls identify racial bias as a factor in SROs' decision-making process.** Specifically, African-American girls perceive that their racial identity negatively affects how SROs respond to them on campus.
- **Girls of color report that SROs attempt to modify their behavior and appearance to conform with mainstream cultural norms regarding gender roles and sexuality.** Participants described interactions in which SROs tried to make them act and look more "ladylike."

FINDINGS IN DETAIL

SCHOOL RESOURCE OFFICER (SRO) FINDINGS

SROs who participated in this study stated that their most important role is to contribute to a sense of safety and help establish a positive school environment. When asked specifically about girls of color, participants acknowledged disproportionate disciplinary trends compared to white students and recognized that they signaled a need for specific interventions; yet they reported relatively few formal or informal opportunities to learn how to improve interactions. Some participants stated that involvement in this study was the first time they were invited to critically examine some of the factors associated with increased contact with girls of color and how their relationships might be improved. A description of key findings from these discussions follows.

FINDING 1:

SROs primarily define their role as ensuring safety in school — which they define broadly to include a positive school environment, healthy relationships with students, and keeping students in school — not responding to disciplinary infractions.

Overwhelmingly, SRO participants described their role as ensuring safety and a positive school environment. There was consensus that SROs' primary role in creating a sense of safety for youth stood in contrast to the work of officers whose work is not centered on serving children.

> "The role of an [SRO] is to help nurture and maintain a healthy environment in the school — for everyone in the school." — *School Resource Officer*

Participants defined "safety" broadly to include informal interactions with students that allow for relationship-building. Participants specifically noted that such relationship-building may not be assumed or immediate but instead takes time to develop. In the officers' views, when relationships thrive, students feel safer and SROs are able to perform their duties with minimal conflict.

> **"It takes time to build a relationship. … A child might say she can't talk to this officer, but she can talk to another one. … As far as dealing with girls and getting them to respect you, to me, it's just the basic conversation. … When you see them in the hallway, speak to them. Make them laugh. It just happens like that. Not walking to school with your chest poked out like you're the baddest thing in the form of an officer. … Or when they look upset, just pull them in and ask 'What's wrong?' Talk to them. Approaching them makes gains."** — *School Resource Officer*

> **"SRO(s) should be building relationships with the students. Having officers in schools is a good way to see officers as people, and not just responding to crime. If the SRO(s) build partnership with the students, as they get older they will continue that trust and that relationship."** — *Law Enforcement Officer*

Some participants, however, noted that not all SROs agree in defining their role. For example, in response to a question about the conditions that contribute to safety in schools, some SROs believed that a healthy school environment is defined as one that is "built on fear of law enforcement, [where] students should be afraid to misbehave."

Participants also stated that they are most effective when they establish ongoing relationships and develop mutually accepted norms of behavior with students. They reported that relationships are most effectively established when they present themselves informally and are available in locations where social interactions occur.

> **"The SROs should be in the halls, in the lunchroom, building trust informally. Where are the informal places where kids are? That is where the officers should be. Students, especially girls of color, have no reason to trust an SRO from the beginning. It is incumbent upon us [officers] to build it. [For example,] wear something less threatening to the students. It's the little things that add up."** — *Law Enforcement Officer*

FINDING 2:

SROs state that educators routinely request them to enforce discipline.

SROs' descriptions of their role reflected an understanding that their duties do not include involvement in school disciplinary actions. Yet participants noted that administrators and educators often misunderstand this boundary and ask them to respond to disciplinary incidents. As a result, officers suggested that school-system employees should learn to distinguish which behaviors warrant officer response.

> **"If there is a crime being committed on a school campus, yes, the SRO will step in, but administrators think the role of the SRO is to enforce school discipline. That is the job of the school administration. SROs know the difference."** — *School Resource Officer*

SROs and Improved Relationships with Community Police

Officers described part of their role as improving community perceptions of law enforcement. One officer noted that he worked in an area with a high concentration of crime and poverty, where the local community does not have a positive relationship with law enforcement. This officer described SROs as providing an opportunity to change that perception of law enforcement, starting with young people.

Participants stated that because the role of an SRO is often not well-established, formal agreements (known as memoranda of understanding, or MOUs) could help provide clarity.

> "Having a well-defined MOU helps to alleviate confusion between the SRO(s) and school administration. We took a look at what was happening in the schools, and knew we needed to define some rules. That is why we created a MOU." — *Law Enforcement Officer*

> "We edit and review the MOU between the police department and school administration each year. If there are changes, we all agree to them." — *Law Enforcement Officer*

FINDING 3:

SROs do not receive regular training or other support specific to interactions with girls of color.

As a preliminary matter, basic training for SROs varied greatly among participants. While some officers stated that they participated only in the standard police training required for all sworn police officers in their jurisdiction, others received training specific to the position of SRO.[62]

SROs AND FEMALE STUDENTS

Some male officers expressed hesitation about how best to approach girls, revealing a lack of gender-responsive training.

"It's going to look real bad if you have to put your hands on a female … but what [can] you do? People will say, 'they should have done something else,' but what is that something else? If they're pulling each other's hair, do you stand back because you don't want to touch a thigh or slide a hand across the chest? You're supposed to let them assault each other?" — *School Resource Officer*

No participants had received training that specifically addressed interacting with girls of color, such as implicit bias and how it can inform decision-making. Yet officers consistently expressed an interest in such training.

"There isn't enough training in general, and there definitely needs to be training specifically for girls of color. This training should be mandatory for every cop. Cops need to know what type of biases they are taking into these situations. Too many decisions are not based on critical thinking and too many decisions are based on assumptions. … We have a long way to go. … We need cultural competency training, training on language — language can be derogatory, words like "you people" — this all needs to be addressed in regards to both race and gender." — *Law Enforcement Officer*

"I haven't had any specific training [specific to girls of color]. … I rely on the common sense God gave me." — *School Resource Officer*

SRO participants observed that implicit bias can affect officers' responses to girls of color and that training could help officers learn to address such bias and to recognize students with histories of trauma or routine exposure to violence.

"Girls of color are often perceived to be a certain way; they are perceived as lower-class, violent. If a girl of color challenges authority it is deemed unacceptable. When girls don't fall in line they get labeled as acting out. Black girls and women are quickly labeled as 'crazy' or hav[ing] an 'attitude' because they are more vocal. Also, sometimes in schools girls of color are dealing with trauma — especially in my city, the girls are exposed to and experience trauma — so they may act out because of the trauma that is going on at home, and officers will have no idea, and have no idea how to respond accordingly. … The SROs get sex trafficking training, but that is only one aspect of this. There is much more that we are missing — and girls of color are treated differently and often introduced to the justice system because of it, because of our lack of training." — *School Resource Officer*

Many male SROs' views appeared to have been shaped not by professional training but instead by their personal experiences as fathers, brothers, and husbands of women and girls. Many male officers reported that they rely on female officers — including those not stationed in their schools — and other women to serve as resources for girls when they recognize the need for gender-responsive interventions that they felt they could not provide.

SROs reported that they are not provided with information about community resources that could serve as alternatives to discipline. Many officers described offering help to girls of color informally, however, including providing clothing for interviews and negotiating family and community relationships.

FINDING 4:

SROs do not receive training or information about community resources that could offer support to girls of color as alternatives to discipline, which leads them to rely on *ad hoc*, informal networks.

"There was a girl who needed extra help, and I wanted to get her clothes she needed for a job interview. I had to let my wife know what was happening, because I couldn't buy clothes for a female and bring that receipt home to my wife. So we both helped her out." — *School Resource Officer*

Officers articulated that providing resources to students in crisis is one way to address external conditions that negatively affect girls of color.

"You have to lead more with the 'R' than the 'O'. … Be a 'Resource' more than an 'Officer.'" — *School Resource Officer*

PEERS' DISRESPECT OF SROs

SROs appear to often face contempt from other law enforcement agencies. Some described other law enforcement officers ridiculing them for refusing to use force to respond to students' negative behavior. Others spoke of being belittled or simply dismissed as not being "real" police officers, "kindergarten cops" who do not mirror the typical, "tougher" job performance of other officers.

"Other police always tease us and call us toy cops … they think we're just playing with the kids, that we're not hard enough." — *School Resource Officer*

FINDING 5:

Racial tensions in local communities appear to affect the dynamics between SROs and girls of color.

Many participants believed that students' negative interactions with white officers in their communities are sometimes reflected in attitudes toward law enforcement in school.

"You have to come in as a human, not as an officer. … Some of the girls look at me and think I'm racist, but I'm just trying to do my job." — *School Resource Officer*

"With Black females, if you're nice to them, they have utter contempt — well, some that I have dealt with have utter contempt for police. They make no bones about the fact that they do not respect you. They automatically don't like me. They won't look at [me] when they're talking to [me]. That's basic respect for anyone. They'll walk away, turn their head. … I would pretty much bet a million dollars that they don't do it at home because they'd probably get knocked across the room, but in a school setting, they're very emboldened. … By the time they get [to my high school], they're 14 and 15 years old. They've had 14 years of doing what they want to do, how they want to do it. I can't raise your kid in ten minutes." — *School Resource Officer*

Tensions also appeared to be present between girls and officers of color.[63] But participants also noted that Black officers may be uniquely positioned to work well with Black girls if they live in the same communities.

"A lot of these kids, a lot of their issues are in their white teachers' classes. … I'm Black. I know Black struggles. So I deal with that. So if I can help them in any way, I'm going to say, look here, you need to pay attention, you need to go to school, you need to do what you're told. It don't take nothing from you. It don't make you less of a man or a woman to be respectful. It's going to help [them] out with their lives." — *School Resource Officer*

SROs attempt to modify the behavior and appearance of girls of color to conform with mainstream cultural norms regarding gender roles and sexuality.

Officers described interactions with girls of color in which they reinforced traditional cultural norms regarding gender identity and heterosexuality. Many officers routinely stated, for example, that girls of color should learn how to behave "like a lady," or expressed other preferences for girls to adhere to traditional social norms.

GIRLS OF COLOR FINDINGS

Girls of color who participated in this study perceived that the role of SROs is primarily to enforce safety. For the majority of the girls who participated in this study, our focus groups were the first time they had been given a formal opportunity to specifically discuss and consider the unique conditions of girls of color in the context of school-based law enforcement. In particular, the study gave them the chance to discuss effective communication and training and how their identities as girls of color informed their interactions with law enforcement. A description of key findings from these discussions follows.

FINDING 1:

Girls of color primarily define the role of the SRO as maintaining school safety.

Student participants expressed the understanding that the function of SROs is to secure their safety. They described safety as both a function of protection from harm and of environments of trust.

> **"Safety would be an environment with no fighting, no violence — everybody would just get along. ..."** — *Student*

Many of the girls referenced the need for SROs to protect them from threats by other students; others discussed the need for SROs to secure the building and students from external threats. Some girls described simulations that heightened the fear of external threats and made it difficult for the girls to envision school without a law enforcement presence.

> **"To make sure there are no outside threats."** — *Student*

> **"We actually did a drill at our school ... We thought it was real, like our principal and our resource officers and our administration made it to where it was a real situation. ... [T]hey did it...so we would act as if it was real. ... And he [the actor playing the part of the perpetrator] went into classrooms and sat down as if he were a person who was mentally like unstable with a gun. And yeah, they made it really real . ... It was terrify-**

ing. ... And ... [we saw] our resource officers and our principal and our administration like in the hallway making sure everything was safe, locked, and they got the person under — under control. ... " — *Student*

FINDING 2:

Girls of color view relationship-building as essential to officers' effectiveness in maintaining safety.

Students also noted that SROs' duty to keep them "safe" could be defined broadly to include roles that help keep them in school. Some girls of color, for example, said that building relationships with SROs and compassionate interactions helped the girls realize their potential in school, which also strengthened their sense of safety.

"I feel that they [our SROs] really bring the relationship of the police and the students closer, because a lot of our police in our school, they're really funny, so like say jokes, and I feel like it lightens up the day, lightens up the mood." — *Student*

"They're here to keep us in school." — *Student*

"We have one main officer that like he walks through the hallways all the time. ... [H]e keeps a very good relationship with us. ... He knows us by name. And he's been there since a couple of us were freshmen. So he's been around for about four years or so ... we have a very positive relationship with him." — *Student*

These statements reveal that SROs' long-term commitment to positive relationships can improve girls' sense of safety. Where relationships between girls of color and school resource officers were particularly strong, girls referred to them as "father figures" or "big brothers." Girls cited examples in which officers acknowledged them as individuals and knew them by name. In these cases, the SROs were people of color from the girls' communities (or similar communities). They also noted that SROs who encourage them to do well gain students' respect.

FEMALE SROs

The number of female SROs is not documented. In the schools that our research team visited and the focus groups we conducted, women SROs were a distinct minority. Most of the students who participated in this study also reported that the SROs in their school were primarily male.

"I haven't seen too many female officers." — *Student*

"Our resource officers within our school, like [when] the [students] who get in trouble and it's like their first time, they'll look at them and go like, you're not that kind of kid. Like I know you. I've seen you around the school. That's not something you would do. … I understand your situation, and I see what you're going through, but you're a smart kid. … [I]f you go to class, you can do your work. If you go to class, if you do what you're supposed to do — you can be successful." — *Student*

"I remember I had got really stressed in like the middle of this year, and I was like, I don't want to do this anymore. And usually, I work really hard, and I'm just always doing a lot in school. And so I remember — like I went in the — like in one of the rooms, … it's like an area where the janitors usually hang out. … But okay, so the janitor was like, you haven't been looking as happy as you usually look. What's going on? And then the officer was like, uh-huh, what's going on? He was like, do you need to come to the jail? But she was just playing — well, she was just playing. It wasn't like a serious thing. And then so even though I didn't really want to tell them like what was going on, they — it seemed like they cared a lot. And so we ended up talking about it. And since then, they showed that they just cared, because each day, they were like, how is it going? Is it getting better? And then I noticed like teachers were focusing a little bit more to make sure that I was okay. So I don't know if they had the conversation. … It made me focus a little bit harder. I felt loved; like, I'm noticed. I'm not just one of the hundreds of people in the building." — *Student*

Significantly, girls felt that SROs' failure to interact with them on an informal, positive basis made them feel less safe in school.

"They have to show us respect in order to get respect." — *Student*

"People think that in school you're safe. You're really not. You're open to a wide range of kids from different homes. The only time officers really get involved is when something gets blown out of proportion. I've never really seen an officer go up to a child on a daily basis and say, 'Hey, what's up with you?' They keep their heads straight. Now, if a situation pops up, then they step in." — *Student*

"Treat us fairly. … School is the first place we start. If we get introduced to drugs, it's not on the streets. I promise you, it's in schools. The first time a girl has sex, it's going to be with a boy she met in school. … Very few adults take the time to say, I'm going to have a relationship with my student, I'm going to make sure everything is okay with them. … They do not do that. … [But] we're just children." — *Student*

Participants agreed that when officers instead serve as a caring presence, students are more likely to positively respond.

"If police officers really care about us, and not only the drama that we get into, then they would check up on us on a daily basis, instead of popping up every time we get into trouble." — *Student*

FINDING 3:

Girls of color suggest that communication with SROs is key to their sense of safety.

Other girls, however, rejected the idea that officers should be involved with them beyond the limits of criminal behavior.

> **"[The SRO] ain't my daddy. [He] can't tell me what to do."** — *Student*

Girls of color recognized that many of their tense interactions with SROs stemmed from a failure to establish meaningful communication, which should include processes and opportunities for SROs to listen to them and understand their perspectives.

> **"Can they understand where we're coming from?"** — *Student*

Overall, girls of color sought respect from SROs and responsiveness to them as young people with diverse experiences. This was an important element of the meaning of safety for the participants in this study.

> **"They say that words don't hurt people, but they do."** — *Student*

> **"I wish they knew how we felt; our feelings. Some people want to express their feelings, but the police make you feel like you can't do it."** — *Student*

FINDING 4:

Girls of color attribute some of punitive responses to broader external factors that they believe SROs do not fully recognize.

Participants noted that SROs fail to recognize underlying structural factors and issues in their families or broader community, resulting in inappropriately punitive responses to their behavior.

> **"Black people, period, have been through a lot. … [S]ome Black people have it really good too, but not unless you're rapping or singing. … Caucasian girls get treated way different from African-American females. … I see it almost every day."** — *Student*

> **"[I wish SROs would] see us, greet us, not judge a book by its cover. If you get into a fight, they'll think you're the baddest kid in the world, they won't talk to you; but they don't know what's going on with you, what's going on at your mama's house."** — *Student*

RACE AND GENDER TENSION: BEYOND SROs

Our discussions with students revealed observations about teachers that were similar to their reports about SROs.

"Teachers don't always take into consideration what's going on in your life. So when you kind of — kind of get too stressed out, you kind of find yourself getting into trouble that you don't need to be in. … Being an African-American female is hard, because she's like one of the only — she's probably outnumbered by the other different cultures. And so sometimes they'll say things, like, that make her feel like she doesn't belong, and so she'll do things to kind of get in trouble." — *Student*

SRO participants also noticed racial tensions between teachers and Black girls.

"But [teachers] look down on our Black girls, and it's sad to see. And they say things like, you need to get where I am, or you're not on my level, things like that." — *School Resource Officer*

These gaps in awareness and understanding can lead educators to inappropriately rely on SRO involvement. Students who participated in our research noted that they would feel a greater sense of belonging if educators more fully understood the root of their identities and behaviors, and suggested that fewer conflicts would result. Training on culturally competent, trauma-informed practices can help improve relationships with students and classroom management and defuse educators' inaccurate perceptions of threat.

FINDING 5:

African-American girls identify racial bias as a factor in SROs' decision-making process.

Student participants perceived that racial bias negatively influences SROs' interactions with them — especially African-American girls.

> "They [SROs] expect us to do bad … [Society] expects us to do bad … Certain people expect more Black people to be pregnant than other races." — *Student*

> "Sometimes I feel like the police in my school don't do much, or they be rude. … Like, us Black girls, like if anybody say something wrong to us, we're going to go off. … Sometimes we're not given a chance because of how we'll argue automatically. If an officer comes to a Black female, they automatically have this strong tone of voice. … They automatically think we'll have an attitude. Black people just get treated differently, period." — *Student*

> "There's an officer … she's really rude. She's a Caucasian lady. I don't have a problem with Caucasian people, but I feel like if she come up and talk to me any old kind of way, I'm going to think that [she's] talking to me like that because I'm Black." — *Student*

African-American girls also expressed the sense that when they were involved in an altercation or disagreement with a white girl, SROs automatically responded more favorably to the white girl.

> "They're quick to run to the rescue, but they're quick to hear the [white girl's] side of the story instead of yours. When they hear her side of the story, they're quick to put you like you did something wrong first … [even if the white girl] started it first." — *Student*

African-American girls sensed that racial tensions interfered with relationship-building with SROs.

> "Most Black girls are talked to so wrong … so, so wrong, and we need mentors. But … a white person, they don't get in as much trouble. Police officers go and talk to them. I've seen it happen before … sit down and have a full conversation with them while they're standing in line at the store. They don't do that with us." — *Student*

Some of the perceptions of SROs' racial bias were informed by girls' relationships with local police, since students typically did not differentiate between the two kinds of officers. Black girls described feeling targeted in their communities on the basis of their race, which they generalized to all officers, including SROs.

> "And so I was walking, I had a book bag and it was raining, so I had to put my hood on. … I've never been in trouble or anything, and I've never been afraid of the police, because, well, I always thought the school resource officer and the police officer were the same. So, I just always felt safe. So I was walking, and then the officer kind of got out of his car, … but I didn't think anything of it. … And so the officer starts to come a little closer to me, and so I was like, I don't know. I don't have anything. I didn't do anything. I'm still walking or whatever, and then he was like, 'Turn around.' …

"So I turned around, and then he was like, 'What's in your bag?' And then I was like, 'It's a book bag.' But I didn't mean to say it in a disrespectful way or anything. And then he was like, 'I need to check it for drugs' and all that.

"So I was like, 'You need to check my bag for drugs?' And then he was like, 'Are you hesitant?' And I was like, 'No, here's the bag.' And so he went through it, and he was like, 'You don't have anything. Are you hiding anything in your clothes?' And then I was like, 'Dude, am I doing something to make you suspect that I'm wrong?' But ... I thought it was okay to ask him that.

"So I was like, 'Did I do anything wrong?' Like, am I walking away [and] I shouldn't be walking or something? And then so the officer was like, 'No.' And then I was like, 'Why are you searching me then?' ... So he was white, and he said, 'You're just another Black girl. I need to make sure you're good.'

"I've never really I guess experienced like a racial situation or anything like this, so I didn't really think anything of it. I thought maybe he like, had a bad morning or something. He was stressed. Because I know he wouldn't have been talking to me crazy. ...

"I felt abused in like many ways, and I was wondering, like is my bag not something I should carry? Is there something wrong?" — *Student*

FINDING 6:

Girls of color report that SROs attempt to modify their behavior and appearance to conform with mainstream cultural norms regarding gender roles and sexuality.

Girls of color described interactions with SROs in which the officers reinforced mainstream cultural norms with respect to how girls should behave, how they should speak, and what they should wear. Specifically, girls of color described being guided by SROs to be "ladylike" or to present themselves in schools in traditionally defined professional and non-confrontational ways.

"[Our SRO is] a father. So he tries to step in that role, [and say] 'Don't be doing that, because that's not ladylike. ... [Y]ou shouldn't want to portray that about yourself, because you're better than that. You can be a success in life.'" — *Student*

In focus groups, girls of color discussed what being "ladylike" meant to them and whether it was desirable to be viewed as traditionally ladylike. The various tensions they felt about this issue were reflected in their discussions:

BLACK GIRLS' PERCEPTIONS OF DIFFERENTIAL TREATMENT BY AUTHORITIES

Many girls who participated in our study expressed the perception that authorities engage them differently than their white counterparts in ways that negatively affected their trust and the extent to which they were willing to participate in interventions designed to address student conflict. For example, one participant related this anecdote:

"I got into an altercation with this Caucasian girl [in middle school]. … The police officer came in there and tried to talk to me and tried to talk to her. … But like, he asked me, '[W]hat did you say to her?'

"Why did it have to be 'what did I say to her?' Why couldn't it be, 'Who started it first?' or 'What's going on? What happened?' …

"So then I told him, 'I'm not telling you nothing, because that's not what you're supposed to ask me.'

"So he said, 'Okay, whatever.' He went to talk to her, and [then] they're sitting there talking! They're having a full conversation! So, I got up and left because that was messed up. That was really wrong. You don't sit there and have a conversation with her and then come over here and ask me one little dumb question.

"If he would have come in and was like, 'Okay, what happened? How did it start off?' I would have been proud to sit there and tell him, 'She came at me rudely,' etc. 'That's how it happened.'

"But he didn't do that, so I got mad and was like, get out of my face. … Go over there and talk to her, because you don't come at me like that."
    Student

"My definition for ladylike, I feel like it differs from each person, each girl. Some girls want to be, let's say, a 'girly girl.' Other girls like to be tomboys. So some girls may feel like they can hang with the boys or whatever, and some girls may like to just stay predominantly around girls. So the term 'ladylike,' I feel like it shouldn't — like there's no such thing as saying like you're not acting ladylike, because some girls don't want to be the one that wears dresses and has earrings in and wears heels. Some like to wear tennis shoes, jeans, maybe just a shirt or something like that." — *Student*

"To be honest, I think it doesn't matter if you're tomboyish or if you're a girly girl. It's just how you present yourself — If you're not acting disrespectful. You're showing the world that somebody can be respectful and still have a good life and be successful, without being violent. … That's being ladylike." — *Student*

Girls of color also stated that some of the tensions experienced with SROs are attributable to officers' interpreting their style of communication as combative or as an affront to the authority of SROs in a way that is inconsistent with traditional feminine norms.

"Sometimes [police] come at you so wrong — we're children, and they're police. They think that we [shouldn't] voice our opinion. … [But] no, I'm going to say what I'm going to say! And you can't do nothing about it. You cannot get mad if we do something that you don't like. … When they have higher [authority], they go overboard." — *Student*

"[I wish they knew] … how you were raised. When someone hits me, I hit them back. It they don't touch you, then I just leave it alone. But in many communities, if someone hits you, you have to fight back." — *Student*

Girls of color also noted that on some occasions, in guiding them to be more "ladylike" or to comply with school rules, SROs informally but explicitly correct them — especially when officers believe girls' attire may violate the school dress code.

"I think that it goes back to communication, and how it builds a strong relationship, because if they see a girl … [does not have] the appropriate attire, they'll — more than likely, they'll just pull them aside and tell them, well, I think you should not wear this, and this is why." — *Student*

"We have a dress code, so sometimes they'll just say, well, you know that's not in dress code. Why do you have that on?" — *Student*

DISCUSSION

Our findings reveal that the student participants were accustomed to regular interactions with law enforcement in schools.[65] Both SROs and girls of color perceived that the primary function of officers is to ensure the physical safety of students, a positive school environment, as well as motivation for students to succeed and stay in school.

INTERNALIZED OPPRESSION

Internalized gendered racial oppression is the process by which Black fe males absorb and accept the dominant culture's distortions of Black femi nine identity (e.g. as less intelligent, hypersexual, loud, sassy, "ghetto," or domestic) and oppressive patriarchal ideologies that undermine the healthy development of Black females.[64] Our ethnographic method, which included interviews and focus groups with girls of color, revealed some degree of in ternalized biases about racial and gender identity: that is, some girls blamed themselves for negative behavior and interactions with SROs in ways that reinforced bias and stereotypes — for example, answering a question about why Black girls are disproportionately disciplined by stating "because they're ignorant." However, on further probing, the same girls offered more nuanced layers of analysis that reflected a greater degree of rigor and objec tivity, ultimately recognizing the influence that bias plays in their interactions with SROs.

The nature of these interactions and girls' perception of their safety was largely informed by the extent to which SROs had established effective relationships, trust, and communication. A consensus emerged among both groups that relationships are stronger when SROs implement skill sets outside of punitive roles. The result is a platform for meaningful exchange, a sense of school safety, and mutual respect.

However, officers were hindered by the reported lack of training and information they receive to support girls of color. As a result, some officers draw on personal relationships and resources to help girls in need. The limitations inherent in this approach emerged when officers expressed concern about boundaries. One officer, for example, told us that he once sought to buy suitable interview clothes for a student, but asked a female officer to do so because he feared that if he made the purchase, his wife would misinterpret the credit card receipt as indicative of an inappropriate, intimate relationship. In addition, officers expressed concern that they would be vulnerable to sexual harassment claims if they

interfered in girls' physical disputes. Others suggested that girls who seek interference in such disputes were attempting to entrap them. Significantly, one officer suggested that SROs' lack of training directly contributed to the likelihood of arrest of girls of color.

Overall, girls of color expressed the desire to be understood and respected by SROs. They felt that improved communication would help reach that goal and improve their sense of safety by motivating them to do well and avoiding negative interactions. Girls felt that being precluded from opportunities to communicate with officers — especially, in their view, about incidents with white girls — prevents the development of trust and meaningful relationships that can improve discipline outcomes.

Race and gender emerged as factors that significantly affected relationship-building. Girls' observations that few females serve as SROs in their schools suggest that they found the gender gap significant. In addition, both girls and SROs discussed officers' actions that were intended to reinforce or impose norms of mainstream femininity on girls of color, including attempts to help girls present themselves as more "respectable" and "ladylike." The interplay between race and gender bias renders enforcement of such norms against girls of color more complicated.

Very few of the student participants questioned whether police officers were needed in schools. The majority of the girls could not envision a learning environment devoid of law enforcement. While this result may simply reflect the common presence of SROs, it may also suggest that girls remain afraid. To the extent that is the case, girls should be consulted about how such fears could be best alleviated. Some schools appear, in fact, to have stoked girls' anxiety about threats and the consequent need for police by staging active-shooter drills.

The girls who did question whether law enforcement is necessary stated that SROs should respect boundaries and not act as parents. Others noted that teachers, counselors, therapists, and other school system workers, rather than police officers, should ensure girls' sense of safety. These views suggest that girls believe that safety can best be fostered by teachers who engage them "with respect to earn respect." In the words of one girl, "Treat us the same way you'd treat your child. We ain't no animal."

CONCLUSION

The findings of this study suggest that officers and girls of color agree that SROs can most effectively foster a safe school environment when they commit themselves to building mutual trust and inspiring academic success. Yet officers described a lack of clarity about the limitations on their role, and demonstrated that they have not received sufficient training to implement culturally competent and gender-responsive approaches to girls of color. This gap presents a unique opportunity for SROs and girls of color to collaboratively create a definition of safety in schools through effective and respectful communication, trauma-informed and healing-centered[66] responses, and punitive roles limited strictly to criminal law enforcement.

These findings may be transferable to districts and schools that seek to improve the interactions between girls of color and SROs. They can also inform future research and reform efforts to improve school environment.

Guidance based on these findings is critical if we are to make real gains. The next section of this toolkit provides concrete strategies and recommendations to that end.
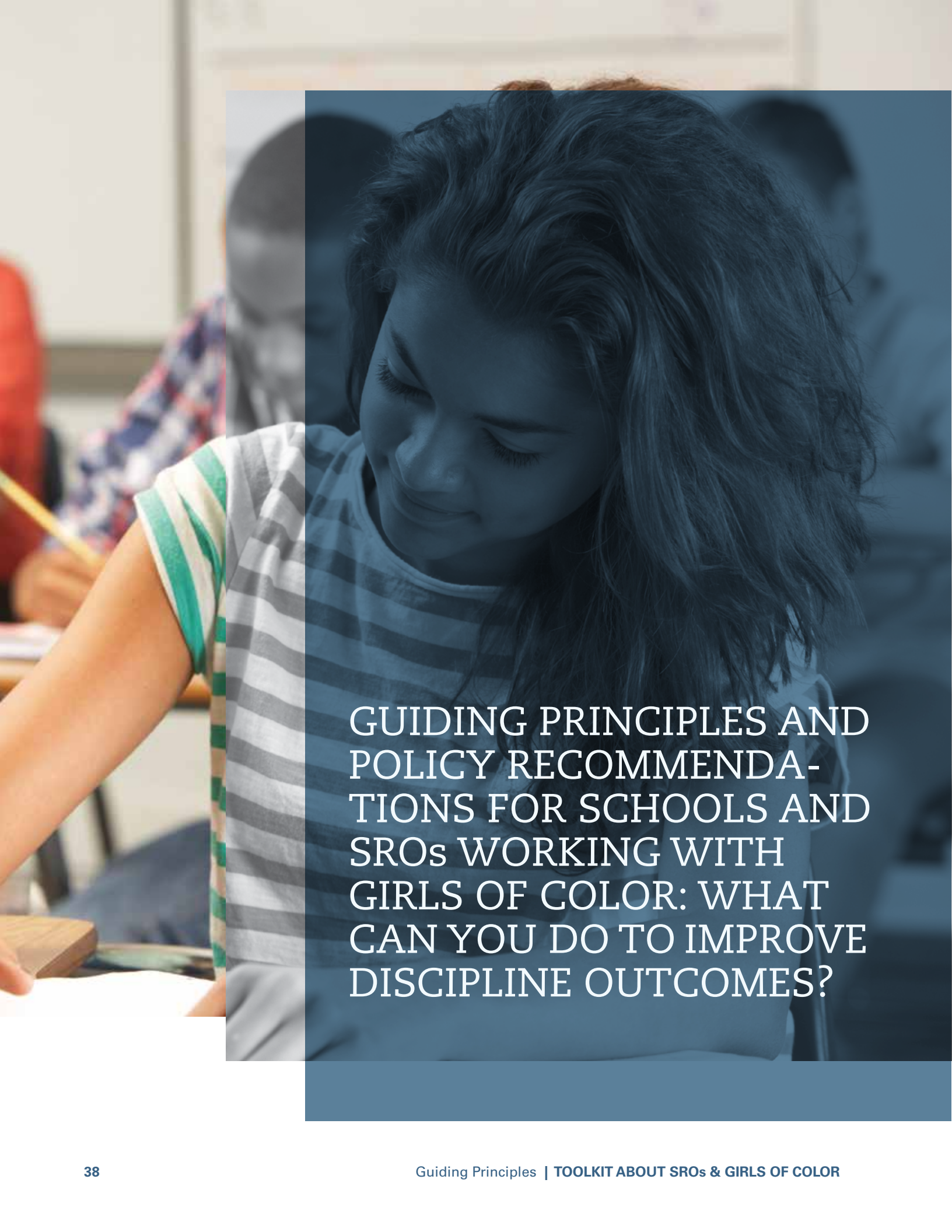
GUIDING PRINCIPLES AND POLICY RECOMMENDA-TIONS FOR SCHOOLS AND SROs WORKING WITH GIRLS OF COLOR: WHAT CAN YOU DO TO IMPROVE DISCIPLINE OUTCOMES?

It is critical to take concrete steps to actively reduce SROs' negative interactions with girls of color immediately, given officers' continued and even increasing presence in schools. This need was powerfully reflected recently when the President of the International Association of Chiefs of Police issued an apology that recognized "historical patterns of mistreatment against communities of color." While some appreciated this gesture,[67] representatives of the communities at issue as well as the Fraternal Order of Police asserted that apologies are inadequate if unaccompanied by action.[68] This section presents principles and policy recommendations in the spirit of providing guidance to take such concrete steps.

As stated above, this project should not be interpreted as endorsing the widespread use of SROs, but is instead designed to help create safer learning spaces for girls of color given current practice. On that basis, this section of the toolkit presents guiding principles and policy recommendations based on our research findings. These recommendations are intended to improve relationships between girls of color and SROs and to highlight areas for further exploration and partnership with girls of color, who have not been at the center of previous efforts. Reform consistent with these principles can improve understanding, trust, and mutual respect between girls of color and SROs, which can in turn decrease disproportionate rates of school discipline and contact with the juvenile justice system.

PRINCIPLE 1:

CLEARLY RESTRICT LAW ENFORCEMENT ROLES AND RESPONSIBILITIES IN FORMAL AGREEMENTS WITH SCHOOLS

The broad discretion exercised by SROs, as well as the lack of clarity about their roles our research uncovered, reveal the need for formal agreements between schools and police departments — known as memoranda of understanding (MOUs) — that clearly limit the role of law enforcement to responding to criminal activity and prohibit SROs from enforcing disciplinary policy.[69] As one participant in our study noted, "[A] well-defined MOU and training … has helped to decrease confusion." By creating clear boundaries for appropriate officer intervention, these terms can help avoid incidents in which minor violations escalate into conflicts with police and reduce the criminalization of disciplinary policies that disproportionately affect girls of color.

SUPPORT FOR THIS PRINCIPLE:

- Joint guidance issued by the U.S. Departments of Justice and Education in September 2016 stated that MOUs should "[i]nclude language that explicitly prohibits SROs from involvement in enforcing school codes of conduct or engaging school discipline, and clarify their role to ensure safety and security."[70]

- The U.S. Department of Justice endorsed the importance of such clarification in a fact sheet issued in 2013:

    > Every jurisdiction with a school and law enforcement partnership should have an MOU that clearly defines roles and responsibilities of the individual partners involved … It should clearly indicate that SROs will not respond to or be responsible for requests to resolve routine discipline problems involving students … [which] is the responsibility of school administrators unless the violation or misbehavior involves criminal conduct.[71]

- The COPS office of the U.S. Department of Justice requires that MOUs for federally funded SROs meet criteria regarding clarified roles.[72]

- The National Association of School Resource Officers (NASRO) has described MOUs as "essential" and has emphasized: "An SRO is **not** a disciplinarian. This is strictly a responsibility for administrators and should remain as such to not confuse the role of the SRO as a law enforcement officer."[73]
- The Police Foundation has similarly endorsed the principle of clarity of roles.[74]

RELATED EXAMPLES:

- **Denver, CO Public Schools.** Denver has a diverse student population.[75] The MOU between the Denver Public Schools and Denver Police Department delineates roles and clarifies the disciplinary code to distinguish between behavior that requires handling by the school rather than SROs. Specifically, the MOU requires SROs to differentiate between disciplinary issues and crime problems and respond appropriately; de-escalate school-based incidents whenever possible; and understand the districts' discipline policy that emphasizes the use of restorative approaches[76] to address behaviors and minimize the use of law-enforcement intervention.[77]

- **Richmond, VA Public Schools.** The MOU established between the Richmond Police Department (RPD) and Richmond Public Schools (RPD) states, "RPS and RPD agree that the involvement of the schools' SROs should not be requested in situations that can be safely and appropriately handled by the school's safety officer(s) and RPS disciplinary procedures.[78]

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- School districts and police departments should enter into MOUs that clarify the role of SROs (and other law enforcement officers called to campus). Specifically, these MOUs should limit police action to criminal law enforcement and clarify that police should not enforce discipline policy.
- A school-based accountability team should convene periodic meetings that include school system leaders, educators, SROs, and law enforcement leadership. At these meetings, the team should review compliance with MOU terms and implement any necessary modifications as a result.
- MOUs should be updated and revised each year to account for changes in the demographics of the student population, respond to incidents that may arise during the school year, and accommodate shifts in political leadership and the school climate.

PRINCIPLE 2:

DEVELOP INCIDENT PROTOCOLS AND DECISION-MAKING INSTRUMENTS FOR SROs

Written protocols or other standards for responding to incidents can help improve interactions with girls of color. These instruments should be collaboratively created with input from community stakeholders, including counselors, service agencies, and health professionals who regularly work with girls of color. The goal is to develop a decision-making process for SROs that is grounded in the best available evidence from research and the field, while taking unique local factors into consideration and putting a special focus on race and gender. These protocols should be made public to increase transparency and hold police departments accountable.

RELATED EXAMPLE:

- **Clayton County, Georgia:** Judge Steven Teske, Chief Judge of the Juvenile Court of Clayton County and a leader in advocating reform to shift SRO involvement away from noncriminal activity, has developed a model for decision-making and systems of accountability for the Clayton County Juvenile Detention Alternatives Initiative (JDAI) School-Justice Partnership Replication Team. The goal of this model is to reduce school-based referrals to the court.

  Under this model, which centers on school-justice partnerships, cooperatively drafted agreements outline key objectives for school-based law enforcement. The agreements clearly define the behavior that requires officer intervention and accompanying actions to be taken along a continuum of graduated sanctions, and establish a process to measure compliance and outcomes. *See Figure 1.*

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- Schools and police departments should cooperatively draft decision-making tools and incident protocols with input from community stakeholders. The goal of such tools is to reduce unnecessary contact with SROs and the juvenile justice system.
- Procedures and incidents should be routinely reviewed to identify problematic patterns.
- On the basis of such reviews, revisions should be implemented where identified as necessary.

FIGURE 1: ROLE CONFLICT AVOIDANCE DECISION-TREE
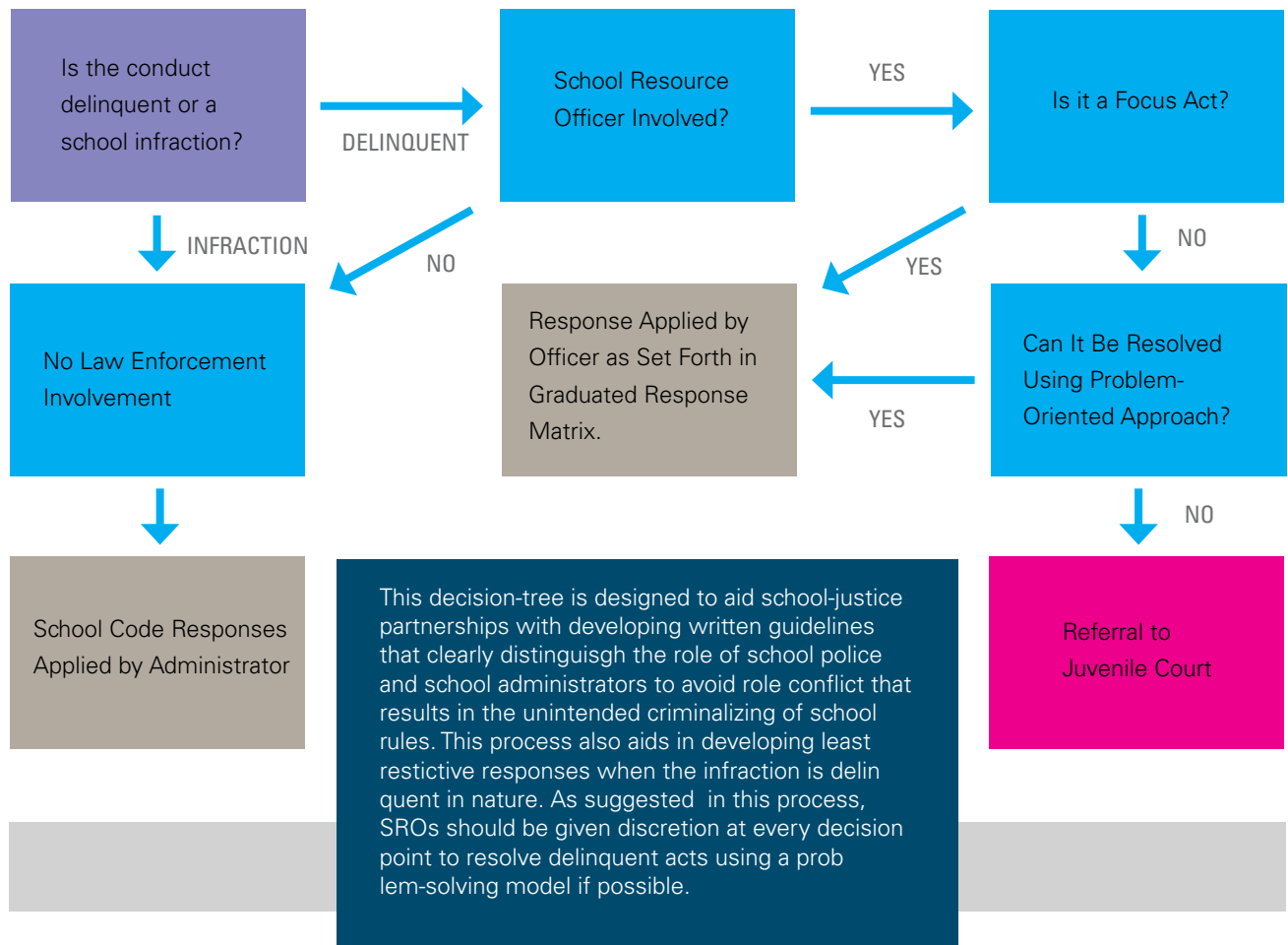
Source: Developed by Judge Steven Teske, Clayton County JDAI School-Justice Partnership Replication Team. Used by permission. Contact the Clayton County Juvenile Court for information about technical assistance.[79]

PRINCIPLE 3:

COLLECT, REVIEW, AND ACT ON DATA

Collecting and reviewing data can help police departments and schools more effectively improve interactions with girls of color and patterns of disproportionate contact.

At a minimum, the following categories of data should be captured within relevant confidentiality and other legal constraints: the behavior at issue; strategies implemented to respond to the behavior; the final outcome of the incident; and the student's age, race/ethnicity, gender, and disability status.

On the basis of such information, schools and police departments can monitor compliance with protocols and applicable civil rights laws and determine necessary changes and the need for training.[80] Reviews should include input from female students of color and community stakeholders. The data review process should be transparent, in an effort to hold police departments and school districts accountable to the students and community they serve.

RELATED EXAMPLES:

- **Broward County, Florida's** collective agreement on discipline requires the collection of data reflecting all school-based arrests, referrals to law enforcement, and filing of criminal complaints and disaggregated by location of arrest/school, charge, arresting agency, gender, age, race/ethnicity, disability and ESL status is collected by the School District and Department of Juvenile Justice.[81]

In addition, the agreement requires this data to be analyzed to monitor:

> [the] number of minor incidents being handled by the criminal justice system and reductions in racial disparities. … This data will also be reported to the public at the end of each semester to monitor whether there have been reductions in the overall number of minor incidents being handled by the criminal justice system and reductions in racial disparities.

It further requires schools and police to meet at least twice annually to discuss the data and recommend improvements.[82]

- **Colorado:** State law requires data collection on reports of student misconduct and punishments received, broken down by race and gender.[83] It further requires the analysis of this data, disaggregated by race and gender.[84]

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- State and local jurisdictions should mandate data collection for incidents handled by SROs that capture the incident-related information listed above, which can be disaggregated by race and gender. Within relevant confidentiality and other legal constraints, the data should be made publicly available on a routine basis.
- Schools and police departments should regularly review and analyze data to determine patterns of contact between girls of color and school-based law enforcement and act on those analyses by identifying and addressing any disproportionate rates of interactions.
- Agencies should collect and publish disaggregated data on the race and gender of SROs assigned to each school to better understand patterns of behavior and relationships, inform training development, and establish greater diversity in officer assignments.

PRINCIPLE 4:

DEVELOP AND IMPLEMENT A CONTINUUM OF NON-PUNITIVE RESPONSES

School systems should implement approaches that are responsive to girls of color and account for students' life experiences, including histories of trauma. Such approaches should include processes to resolve conflict, such as restorative practices, which create an opportunity for productive dialogue and have been shown to reduce rates of exclusionary discipline. SROs must be trained to help successfully implement such approaches.

Key objectives associated with trainings should include:

- Improved identification and response to survivors of gender-based and sexual violence and human trafficking/exploitation;
- Improved understanding of the nature and effect of historical trauma on girls of color;
- Improved de-escalation techniques and communication skills with youth, especially those who are victims of violence, that minimize disruptions in learning and use of force;
- Greater understanding of effective intervention strategies for victims of violence that prioritize safety and minimize contact with the juvenile justice system;
- Greater understanding of techniques to avoid actions and language that are likely to re-trigger trauma symptoms in girls of color.

RELATED EXAMPLES:

- Schools from **Oakland, CA**[85] to **Philadelphia, PA**[86] have implemented restorative justice programs that have helped reduce referrals for violent behavior, suspensions, and expulsions. Some jurisdictions, such as Baltimore, MD, offer special trainings in restorative practice for SROs.[87]
- **Broward County, FL** has provided an alternative to imposing suspensions on students by instead referring them to a program that provides counseling and academic support for 2-9 days off campus before returning to school, with counselors monitoring progress for 6 weeks before reassessing the case. The school system also trained staff to address behavior without involving the police.[88]
- A high school in **Walla Walla, WA** was one of the first in the country to implement trauma-informed alternatives to discipline, which included the school's SRO in its efforts. After the first year of implementation, the school reported significant drops in the number of suspensions and expulsions, which continued to decrease in subsequent years. The SRO who was assigned to the school during its transition year later wrote, "From the 2009-10 school year to the 2010-11 school year [the first year the trauma-informed approach was implemented], my police reports at Lincoln dropped from 48 to 17!"[89]

- **The MOU created between the San Francisco Unified School District (SFUSD) and San Francisco Police Department** specifically states, "SFUSD administrators shall prioritize alternatives to school removals and police involvement, such as the use of Restorative Practices."[90]
- **The National Association of School Psychologists** — in partnership with the American School Counselor Association, the School Social Work Association of America, the National Association of School Resource Officers, and the National Associations of Elementary and Secondary School Principals — developed a framework for comprehensive school safety that provides guidelines designed to increase schools' capacity to identify healing-centered approaches to students, including an emphasis on providing "comprehensive school mental and behavioral health services" and "trauma sensitive supports" that promote a sense of safety.[91]
- Some states require SRO training on restorative practices and the harmful effects of school exclusion and juvenile justice involvement, including:*

    > **Illinois:** 105 ILL. COMP. STAT. 5/10-22.6 (2016) requires that schools "make reasonable efforts to provide ongoing professional development to … school resource officers … on adverse consequences of school exclusion and justice-system involvement, effective classroom management strategies, and developmentally appropriate disciplinary methods that promote positive and healthy school climates;"

    > **Utah:** UTAH CODE ANN. § 53A-11-1603(1), (3) (2017) requires that SROs receive training in restorative justice practices.

Although these examples are not specifically designed to address the needs of girls of color, they provide a strong foundation for reduced rates of police involvement and can be adapted to focus on issues relevant to girls of color.

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- School districts should prioritize the development and implementation of trauma-informed approaches that include a robust array of mental and physical health services, within appropriate confidentiality safeguards. These approaches should offer culturally competent and gender-responsive alternatives to punitive discipline; address the root causes of school-based misbehavior; guide girls of color to learn and heal from mistakes; and establish procedures to resolve conflict with minimal law enforcement involvement.
- School districts and police departments should be provided with training opportunities to learn about the effectiveness of trauma-informed, gender-responsive approaches in reducing disproportionate contact between girls of color and the juvenile justice system, including meeting with leaders in jurisdictions that have implemented such approaches who can serve as resources to guide new efforts.
- Subject to appropriate exceptions, schools and police departments should implement collaboratively constructed graduated response systems to criminal student behavior that use diversion and restorative alternatives when possible and limit referrals to juvenile probation.
- SROs should be offered training on trauma-informed, non-punitive responses to girls of color, consistent with the guidance above.

PRINCIPLE 5:

PROVIDE SROs WITH TRAINING ON GENDER AND RACIAL BIAS AND CULTURALLY COMPETENT APPROACHES

SRO training can improve interpretation of, and responses to, the behavior of girls of color by accounting for their layers of identity, including their race, ethnicity, gender identity, and sexual orientation. As NASRO has stated, "a commitment to proper training is the key to success in SRO programs. … "[92] Given the current lack of training curricula specifically tailored to issues relevant to girls of color, professional development opportunities on these topics should be developed.

Training should include the following elements:

- **Race and Gender Bias.** Key objectives associated with this training should include:
    - > Improved understanding of race and gender bias against girls of color, including participants' own potential biases, such as the potential to "adultify"* girls of color, and the effects those biases have on interactions with girls of color;

    - > Improved understanding of diversity in sexual orientation and gender identity among girls of color;

    - > Improved ability to interact with girls of color without unintentionally or intentionally imposing norms of behavior based on mainstream stereotypes of femininity.

- **Culturally Competent Communication.** Key objectives associated with this training should include:
    - > Increased ability to engage in gender-responsive and culturally competent verbal and nonverbal communication;

    - > Improved understanding of verbal and nonverbal behavior by girls of color;

    - > Increased language skill sets to better interact with girls of color; and

    - > Improved language skills that build trust and mutual respect with girls of color.

 *Research has shown that Black girls are perceived by adults as older, less innocent, and more adult-like. *See* Epstein, Blake, and González, Girlhood Interrupted: The Erasure of Black Girls' Childhood (2017).

RELATED EXAMPLES:

- Our research has not found any training programs that specifically address SROs' responses to girls of color.

- Some state laws require general cultural responsiveness and diversity training, which could be adapted to include issues relevant to girls of color. These laws including the following:

  > **Illinois:** 105 ILL. COMP. STAT. 5/10-22.6 (2016) requires that schools "make reasonable efforts to provide ongoing professional development to … school resource officers … on … **culturally responsive discipline**. …"

  > **Indiana:** IND. CODE §§ 5-2-1-9; 20-26-18.2-1 (2017) requires that SROs be trained police officers, and police must undertake a "course of study on **cultural diversity aware-ness**," which **"must include an understanding of cultural issues related to race, religion, gender, age, domestic violence, national origin, and physical and mental disabilities."**

  > **Maryland:** MD. CODE § 7-430 (2010) "encourage[s]" SROs to complete a cultural compe-tency training curriculum.

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- Jurisdictions should develop and require SROs to participate in training on race and gender bias, including issues specifically relevant to girls of color as outlined above. These trainings should also cover the importance of building trust, resilience, and communication with girls of color to support their health and wellbeing.

- Jurisdictions should develop and require SROs to participate in periodic training on approaches to girls of color that are trauma-informed, gender-responsive, and culturally competent. A key goal of this training should be improved interpretation of the behavior or language of girls of color and avoiding unnecessary or inappropriate punitive responses.

PRINCIPLE 6:

REQUIRE SRO TRAINING ON CHILDREN'S AND ADOLESCENTS' MENTAL HEALTH

SROs should receive training from school-based counselors and information about community mental-health resources to improve their responses to girls of color. Such training can improve interdisciplinary team effectiveness. As the National Child Traumatic Stress Network (NCTSN) has recognized, "When police officers acquire a trauma perspective *and work in concert with mental health providers and the community*, families and children see them not simply as forces of order charged with enforcing the law, but as trusted advocates concerned about their safety."[93] The COPS office has underscored the importance of officers' being trained in juvenile mental-health issues.[94]

RELATED EXAMPLES:

- In **Fall River, MA**, all SROs are certified as Youth Mental Health First Aid Trainers. The training helps officers identify potential mental health issues in order to facilitate early detection and treatment by mental health care providers.[95]

- The **Denver, CO** MOU states that SROs must obtain and provide social service resources when necessary.[96]

- The **COPS Office** has developed a list of organizations that provide mental-health training to SROs.[97]

- The **International Association of Chiefs of Police (IACP) and the Yale Child Study Center** recently released a toolkit to assist police departments in responding to children who have experienced trauma, with information targeted to leadership and frontline officers.[98]

- Some states require or encourage childhood mental-health training and adolescent development for SROs, including:
    - > **Kansas:** Kan. Ann. Regs. §§ 16-16-2; 16-16-3 (2016) requires SROs to take a skill-development course on adolescent development and mental health.

    - > **Massachusetts:** Mass. Gen. Laws 71 § 37P(b) (2015) allows preferential hiring for candidates who have undergone "specialized training in child and adolescent development, de-escalation and conflict resolution techniques with children and adolescents, behavioral health disorders in children and adolescents, alternatives to arrest and other juvenile justice diversion strategies and behavioral threat assessment methods."

> **North Carolina:** N.C. Gᴇɴ. Lᴀᴡs § 160A-288.4(a) (2013) requires that SROs receive training "on research into the social and cognitive development of elementary, middle, and high school children."

> **Texas:** Tᴇx. Occ. Cᴏᴅᴇ Aɴɴ. § 1701.262(c) (2015) requires SROs to undergo a training curriculum that covers child development, positive behavioral intervention, conflict resolution, and mental-health crisis intervention.

> **Utah:** Uᴛᴀʜ Cᴏᴅᴇ Aɴɴ. § 53A-11-1603(1), (3) (2016) suggests that SROs receive training on child development and age-appropriate responses to students.

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- Schools and police departments should develop training for SROs on children's development and mental health, with a particular focus on issues relevant to girls of color and alternatives to punitive discipline when responding to children who have experienced trauma.
- Jurisdictions should require children's mental-health training for active SROs.
- SROs should be trained to work in partnership with mental-health experts to divert students from the juvenile justice system where appropriate and provide them with responses and resources from mental-health professionals.

PRINCIPLE 7:

EMPHASIZE THE 'R' (RESOURCE) IN "SRO": DEVELOP COMMUNITY RESOURCE LISTS TO SUPPORT DIVERSION AND TREATMENT

Police departments and school systems should work with school-based mental health counselors, local stakeholders, experts in the field, and other community members to develop a resource guide of local organizations that can provide alternatives to punitive responses where in-school resources are not available. The guide should include information about the population(s) served by each organization, the accessibility of the program/services (as determined by location, hours of operation, and/or cost), and other elements relevant to girls of color.

RELATED EXAMPLES:

- NASRO recommends that SROs become informed about community agencies that can offer assistance to youths and their families and make appropriate referrals.[99]

- Organizations such as Strategies for Youth and the National Council on Crime and Delinquency (NCCD) have developed matrices, worksheets, and guidelines to help law enforcement more easily refer youth to community-based resources. These lists, typically organized by area of impact (e.g. supervised engagement, youth leadership, education/tutoring, athletic engagement), include the following information:

    > Resource/name of agency

    > Location of services

    > Description of services

    > Eligibility for participation

    > Hours of operation

    > Languages spoken/served

    > Hours of location

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- School systems and law enforcement agencies should cooperatively develop annotated lists of community resources, with input from counselors and community stakeholders. The goal of these lists is to equip SROs and educators with tools that provide appropriate referrals that strengthen the health and well-being of girls of color. To maximize the participation opportunities for girls of color, we recommend that these resource lists include the information suggested above, as well as the following information:

  > Costs (if any) associated with participation

  > Counselors and therapists on staff

  > Reproductive health services/referral processes in place

- School districts should regularly invite input from girls of color and the community about current gaps in resources and recommended improvements.

PRINCIPLE 8:

TRAIN EDUCATORS ON THE LIMITS ON SRO ACTIVITY AND HOW TO EFFECTIVELY HANDLE DISCIPLINARY ISSUES WITHOUT POLICE INVOLVEMENT

SROs who participated in our research stated that educators routinely request their involvement in discipline-related matters. To minimize conflation of roles, teachers should be trained to improve their response to non-criminal incidents without officer involvement. Implementing such skills can, in turn, create safer learning spaces. Educators should also recognize that SROs' roles are limited to criminal law enforcement, as reflected in the terms of MOUs as suggested in Principle 1, and learn to distinguish the rare circumstances in which unlawful student behavior necessitates officer involvement.

RELATED EXAMPLES:

- **The Hickman Mills School District** in Kansas City, MO implemented a series entitled "Courageous Conversations" to educate teachers, administrators, and state troopers who respond to school incidents about racial and gender bias to decrease rates of unnecessary criminalization of students. These conversations, which include learning about promising practices, were conducted at annual events and during faculty development exercises. They emphasize learning to respond to students with fairness, equity, and empathy.

- An **"empathic discipline" intervention** developed at Stanford University revealed that when educators are trained to respond to root conditions underlying student behavior and prioritize student retention in the classroom, students show greater respect for the educator, and the use of exclusionary discipline decreases.[100]

- A recent study revealed that involving teachers in the development of classroom alternatives to traditional discipline allowed them to express concerns and needs and resulted in better understanding of their role in reducing exclusionary discipline and the urgent need for reform. Ultimately, the teachers collaboratively designed a **discipline-decision tool** that better served students.[101]

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

- School districts should provide trainings to improve educators' ability to handle disciplinary issues without police involvement. These approaches should be developed in consultation with educational and school-based mental health professionals using trauma-informed approaches.

- School districts should work with educators to cooperatively create decision-making tools that focus on alternatives to traditional discipline that can reduce reliance on SROs and decrease the use of exclusionary discipline.[102]

- School districts should train educators to appropriately distinguish between disciplinary violations and unlawful behavior.

PRINCIPLE 9:

CREATE OPPORTUNITIES FOR POSITIVE NON-ENFORCEMENT INTERACTIONS AMONG POLICE, GIRLS OF COLOR, AND THE COMMUNITY

On-duty opportunities for SROs to spend time with students can build stronger, more positive relationships based on mutual understanding and respect. NASRO recommends this kind of involvement with students.[103]

Some of these informal interactions should include meetings that are specifically focused on allowing girls of color to provide their perspectives on interactions with SROs. Parents and members of the community should be invited to some of these meetings to increase mutual understanding and broaden sources of input. To maximize inclusivity of girls of color, girls should be consulted to determine the most accessible venue and subject matter that is of greatest interest to them.

RELATED EXAMPLES:

- In **New York City, NY,** the Department of Education and the New York Police Department (NYPD) have developed a program entitled Team Up! Tuesdays, in which NYPD officers participate in activities with students in public schools designed to build relationships. Activities, which include basketball and dance contests, are part of a robust partnership that appears to have resulted in increased student referrals to restorative approaches and a diversionary warning-card program intended to reduce formal citations and arrests for low-level offenses. While the program has not yet been evaluated for net widening or alignment with research-based best practices, this partnership provides a powerful example of efforts to improve the relationships between law enforcement and students.[104]

- **Further resources** that provide basic principles for establishing relationships between police and the youths they serve are listed below. These strategies should be further tailored to the interests and needs of girls of color:

    > Julie Kleinman, Rhonda McKitten & Anthony Meeks, Strategies for Youth, How to Have an Effective Conversation with Youth about Your Police Department's Practices (2012);[105]

    > Center for Applied Research in Human Development, University of Connecticut, Effective Police Interactions with Youth: Training Evaluation (March 2008);[106]

> Center for Court Innovation and U.S. Dep't of Justice Office of Community-Oriented Policing, Police-Youth Dialogues Toolkit, Guide for Improving Relationships and Public Safety through Engagement and Conversation (2015);[107]

> Police Foundation: A Toolkit for California Law Enforcement: Policing Today's Youth (2016).[108]

POLICY RECOMMENDATIONS BASED ON THIS PRINCIPLE:

• Schools and law enforcement agencies should provide SROs with training on the importance of building trust, resilience, and communication with girls of color to support their health and wellbeing.

• Law enforcement agencies should allow the use of police department resources to develop SRO programs that help build informal relationships with girls of color and the community that build trust and mutual understanding.

• Law enforcement agencies should provide opportunities for SROs and police leadership to meet regularly with community members, with special outreach to girls of color and their families, to receive feedback, build relationships, and increase mutual understanding of one another's perspectives.

• SROs should participate in informal activities on campus in which girls of color are interested. To avoid increased and unnecessary contact with the juvenile justice system as a result of these interactions, SROs must approach them as relationship-building activities, and not utilize them to increase student surveillance.

RESEARCH CITATIONS

1. *See* Justice Policy Inst., Education Under Arrest 15 (Nov. 2011); *see also* Amanda Merkwae, *Schooling the Police: Race, Disability, and the Conduct of School Resource Officers*, 21 Mich. J. Race & L. 147, 168 (2015).

2. *See* Sarah E. Redfield & Jason P. Nance, Am. Bar Ass'n, School to Prison Pipeline: Preliminary Report 10 (Feb. 2016).

3. *See* Justice Policy Inst., *supra* note 1, at 2.

4. *See* Nathan James & Gail McCallion, Cong. Research Serv., School Resource Officers: Law Enforcement Officers in Schools 2 (June 2013); Maya T. Miller & Walter Jean-Jacques, The Century Found., *Is School Policing Racially Discriminatory?* (June 14, 2016), https://tcf.org/content/commentary/school-policing-racially-discriminatory/.

5. *See* Merkwae, *supra* note 1, at 158; Am. Civil Liberties Union of Pa., Beyond Zero Tolerance: Discipline and Policing in Pennsylvania Public Schools 5 (Feb. 2015) ("The Gun-Free Schools Act of 1994, the federal zero tolerance policy toward firearms at schools, was enacted in response to violence and crime in schools. As a result, zero tolerance policies quickly became institutionalized in many districts. Then the nation's anxiety about school safety increased once again after the 1999 Columbine High School shootings in Colorado, which killed 15 people. The Columbine tragedy and the strict school-safety mandates of No Child Left Behind (NCLB), enacted in 2001, helped prompt a new wave of tough discipline policies in Pennsylvania and other states."); *see also* Justice Policy Inst., *supra* note 1, at 5.

6. Am. Civil Liberties Union of Wash. Found., Students, Not Suspects: The Need to Reform School Policing in Washington State 2 (2017).

7. U.S. Dep't of Educ., Inst. of Educ. Sciences, Nat'l Ctr. for Educ. Statistics, Public School Safety and Discipline: 2013-1014, Table 6 (2015).

8. U.S. Dep't of Educ. Office of Civil Rights, 2013-2014 Civil Rights Data Collection: A First Look 5 (2016); Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 2; *see also* Benjamin Thomas et al., Nat'l Ctr. for Mental Health Promotion & Youth Violence Prevention, Brief, School Resource Officers: Steps to Effective School-Based Law Enforcement 2 (2013).

9. *See* Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 5-6 ("Nationwide, schools with high populations of low income students, or Black and Latinx students are more likely to have embedded school police.").

10. Sandra Black, Laura Giuliano & Ayushi Narayan, *Civil Rights Data Show More Work Is Needed to Reduce Inequities in K-12 Schools*, The White House Blog (Dec. 9, 2016), https://obamawhitehouse.archives.gov/blog/2016/12/08/civil-rights-data-show-more-work-needed-reduce-inequities-k-12-schools.

11. *See* Merkwae, *supra* note 1, at 163-64; Kerrin C. Wolf, *Arrest Decision Making by School Resource Officers*, Youth Violence & Juv. Just. 1, 2 (2013).

12. *See* Merkwae, *supra* note 1, at 154, 168.

13. *See* Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 1 ("Thirty years ago, few schools would routinely use police to respond to … student discipline incidents … Today, the lines between the education system and the criminal justice system are increasingly blurred.").

14. *See* Wolf, *supra* note 11, at 6-7 (noting that 37% of surveyed SROs said they sometimes "arrested a student because it was the only way to calm a group of students down who were disrupting classes" and 68% sometimes "arrested a student for a relatively minor offense to show the student that actions have consequences").

15. *See* Redfield & Nance, *supra* note 2, at 14-18 (providing an overview of the "school-to-prison pipeline," including the ways that criminal-ization of school discipline contributes to children's contact with the juvenile justice system).

16. *See, e.g.*, Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 8 ("Very few districts in Washington provide any substantive guidance on the types of matters in which police officers should be involved. This creates unfettered discretion to use police in schools as a super-disciplinarian, heightening the risk of unnecessary arrest and prosecution of students.").

17. Jason P. Nance, *Students, Police, and the School-to-Prison Pipeline*, 93 Wash. U. L. Rev. 919, 936-940 (2016) (describing the reasons why it is difficult for students to challenge policing practices in their schools). Students can challenge SROs' actions if they violate civil rights laws, such as the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act, or if they violate students' constitutional rights. *See* U.S. Dep't of Educ., Office for Civil Rights, Delivering Justice: Report to the President and Secretary of Education 17 (2015). In extreme cases, students have won such cases. In Mississippi, for example, the court found that SROs violated students' rights in a pepper-spraying incident. *See* Findings of Fact and Conclusions of Law, *J.W. et al. v. Birmingham Bd. of Educ. et al.*, 2:10-cv-03314-AKK (N.D. Ala., Sept. 30, 2015).

18. *See* Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 9 (providing examples of such agreements); *see also* Letter from Steven Brown, Exec. Dir., Am. Civil Liberties Union of R.I., to Superintendent Patti DiCenso, Pawtucket School Dep't (Oct. 20, 2015), http://riaclu.org/images/uploads/SRO_letter_to_Pawtucket.pdf (noting that in many Rhode Island schools, the police department has sole discretion over appointing and recalling SROs).

19. Only the following states require MOUs: Arizona, California, Colorado, Connecticut, Delaware, Florida, Georgia, Indiana, Kansas, Mary-land, Massachusetts, Mississippi, Missouri, New Hampshire, New Jersey, North Carolina, Pennsylvania, South Carolina, Tennessee, Utah, and Virginia. Note that Arizona, California, New Hampshire, Mississippi, and Virginia only require MOUs if the SRO program is state-funded. *See* Ariz. Rev. Stat. § 15-154 (2014); 5 Cal. Code Regs. 11987.1(e)(2) (2017); Colo. Rev. Stat. § 22-32-109.1(2) (2017); Conn. Gen. Stat. § 10-233m (2015); Del. Code Ann. § 14-600.3.1 (2017); Fla. Stat. § 1006.12(1)(b) (2017); Ga. Code Ann. § 20-2-1183 (2016); Ind. Code § 20-26-18.2-2(a)(3)-(b) (2013); Kan. Stat. Ann. § 72-8222(c)-(d) (2017); Md. Educ. Code § 26-102 (2003); Mass. Gen. Laws ch. 71, § 37P(b) (2015); Miss. Code Ann. § 37-3-82(2)(f) (2013); Mo. Rev. Stat. § 162.215(1) (2013); N.H. Rev. Stat. Ann. 186:11.XXXVII (2017); N.J. Ann. Code 6A:16-6.2.13.ii (2017); N.C. Gen. Laws § 115C-47 (2015); 22 Pa. Cons. Stat. § 10.11 (2017); 41-5 S.C. Code Reg. 63(V) (2017); Tenn. Code Ann. § 49-6-4202(6) (2012); Utah Code Ann. § 53A-11-1604(2) (2017); Va. Code Ann. § 9.1-184 (2014); *see also* Va. Dep't of Criminal Justice Services, *2015-2016 School Resource Officer and School Security Officer Incentive Grant Program: Guidelines and Application Procedures* (2015), https://www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/grants/fy-2015-2016-school-resource-officer-sro/school-security-offi-cer-sso-incentive-grant-program/2015-2016-sro-sso-grant-guidelines.pdf.
    Vermont and Texas do not require, but do "encourage," the use of MOUs. *See* 16 Vt. Stat. Ann. § 1167 (2014); Tex. Educ. Code § 37.2121 (2009).

20. Many state laws do not require training specific to duties as SROs. *See, e.g.*, Ariz. Stat. § 15-155(A) (2015) (providing that SROs must be certified peace officers but requiring no additional training for them); Conn. Gen. Stat. § 7-294x (2017) (no specialized training require-ments for SROs except for drug detection and gang identification); Fla. Stat. § 943.13 (2016) (requiring only that SROs pass a "commis-sions-approved basic recruit training program"); Md. Code § 26-102(a) (2016) (providing that SROs shall be police officers assigned to schools; requiring no specialized training requirements for SROs); Mich. Comp. Laws § 380.1240(1) (2015) (allowing schools to employ law enforcement officers but requiring no specialized training for them); Miss. Code § 37-7-321(2) (2016) (requiring that SROs receive "a minimum level of basic law enforcement training"); Mo. Rev. Stat. § 162.215(1); § 590.200(1) — (2) (2015) (requiring only that SROs receive training in defensive techniques and prevention of handling emergencies in schools); Nev. Rev. Stat. § 391.281(3) — (4) (2015) (requiring that SROs be trained police officers, but not requiring any specialized training for SROs); N.H. Rev. Stat. § 169-B:6(IV) (2014)

(providing for regular police officers to be SROs with no additional training); 24 Pa. Stat. § 7-778(b)(1) (2014) (requiring SROs who exercise law enforcement authority to have gone through basic law enforcement training); 20 Vt. Stat. Ann. § 2358 (2016) (requiring basic training for all officer who serve in a law enforcement capacity). *See also* Wash. Rev. Code Ann. § 28A.300.2851(2)(f) (SROs must be trained police officers; the state is developing specialized training).

Nineteen states do require such training. *See* Ark. Code Ann. § 12-9-501 (2017) ("matters of public school campus safety require specialized education and training for law enforcement officers [and] school resource officers); Cal. Penal Code § 832.3(g)-(h) (2017) (providing that SROs must complete a "specialized course of instruction … to meet the unique safety needs of a school environment"); Colo. Rev. Stat. § 24-31-312(1) (2016) (requiring that SROs receive specialized training); Ga. Code § 35-8-27 (2017) (establishing SRO training that includes "interpersonal interactions with adolescents, including the encountering of mental health issues"); 105 Ill. Comp. Stat. 5/10-22.6 (2016) (requiring that schools "make reasonable efforts to provide ongoing professional development to … school resource officers … on adverse consequences of school exclusion and justice-system involvement, effective classroom management strategies, culturally responsive discipline, and developmentally appropriate disciplinary methods that promote positive and healthy school climates."); Ind. Code §§ 5-2-1-9; 20-26-18.2-1 (2017) (SROs must be trained police officers, and police must undertake a "course of study on cultural diversity awareness," which "must include an understanding of cultural issues related to race, religion, gender, age, domestic violence, national origin, and physical and mental disabilities."); Ky. Rev. Stat. § 158.441(2) (2016) (providing that SROs have "specialized training to work with youth at a school site."); La. Rev. Stat. § 17.416.19(B)(2) (2017) (requiring that SROs be certified by a "nationally accredited school resource officer program or a state school resource officer training program certified by the Council on Peace Officer Standards and training."); Mass. Gen. Laws 71 § 37P(b) (2015) (requiring that SROs have "all necessary training" and should "strive to foster an optimal leaning environment and educational community"; hiring preference may be given to candidates with "specialized training in child and adolescent development, de-escalation and conflict resolution techniques with children and adolescents, behavioral health disorders in children and adolescents, alternatives to arrest and other juvenile justice diversion strategies and behavioral threat assessment methods"); N.J. Stat. §§ 18A:17-43(a); 52:17B-71.8(2)(a) (2015) (most SROs must complete "the safe schools resource officer training course" and training "in the protection of students form harassment, intimidation, and bullying, including incidents which occur through electronic communication."); N.Y. Edu. Law § 2801-a(1); a(2)(c)(i) (2016) (requiring that school security personnel be "adequately trained, including being trained to de-escalate potentially violent situations, and are effectively and fairly recruited."); N.C. Gen. Laws § 160A-288.4(a) (2013) (requiring that in addition to police or military training, each SRO must receive additional training "on research into the social and cognitive development of elementary, middle, and high school children."); R.I. Gen. Laws Ann. § 16-21-24(a)(2) (2013) (SROs should receive training in de-escalation); S.C. Code Ann. § 5-7-12(B) (2008) (requiring SROs to take basic training course for SROs); Tenn. Code § 49-6-4217 (2007) (requiring that SROs receive specialized training particular to SROs); Tex. Occ. Code Ann. § 1701.262(c) (2015) (SROs must undergo training curriculum that covers child development, positive behavioral intervention, conflict resolution, de-escalation techniques, and mental health crisis intervention); Utah Code Ann. § 53A-11-1603(1), (3) (2016) (requiring that SROs receive training in child development, de-escalation techniques, cultural awareness, restorative justice practices, and distinctions between a SRO and other school staff); Va. Code Ann. § 9.1-184(A)(8) (2015) (requiring SROs to receive specialized training). *See also* Del. Law Related Educ. Ctr., *School Resource Officer Training,* http://www.delrec.org/page.php?item=sro (last visited June 7, 2017); W. Va. Ctr. for Professional Dev., *Prevention Resource Officer Program,* http://www.wvcpd.org/news_description.aspx?news_id=163 (last visited June 7, 2017).

21. See https://nasro.org/ for more information on this organization."
22. U.S. Dep't of Justice Office of Community Oriented Policing Srvs., 2016 COPS Hiring Program School Resource Officer Mandatory Training - Fact Sheet 1 (2016).
23. James & McCallion, *supra* note 4, at 20 ("The data … suggest that local law enforcement agencies have funded a majority of SRO positions"). Recognizing the existing gaps in SRO policy and practice, the U.S. Department of Education released guidance in 2016 calling for schools to make improvements. In particular, the guidance recommends improved training of school staff to avoid over-reliance on SROs and instead to address students' behavioral issues through "corrective, non-punitive interventions, including restorative justice programs and mental health supports." John B. King, Jr., Sec'y of Educ., U.S. Dep't of Educ., Dear Colleague Letter 2 (Sept. 8, 2016). In addition, the U.S. Department of Justice's Community Oriented Policing Services (COPS) Office also released guidelines for schools on the proper roles of SROs. U.S. Dep't of Justice, Office of Community Oriented Policing Services, Policing in the 21st Century: Building Blocks of Community Policing (2016).
24. *See* Wolf, *supra* note 11, at 2 (noting that some offenses for which SROs arrest students, such as disorderly conduct, are subjective).
25. Am. Civil Liberties Union of Cal., *California Enacts First-in-the-Nation Law to Eliminate Student Suspensions for Minor Misbehavior* (Sept. 27, 2015), https://www.aclunc.org/news/california-enacts-first-nation-law-eliminate-student-suspensions-minor-misbehavior (limiting the use of suspensions and banning expulsions for "willful defiance" in California).
26. States with laws criminalizing disturbing school, or similar behavior, include Alabama, Arkansas, Arizona, Delaware, Florida, Kentucky, Georgia, Maine, Maryland, Nevada, New Mexico, South Carolina, South Dakota, and Washington. *See* Amanda Ripley, *How America Outlawed Adolescence*, The Atlantic (Nov. 2016), https://www.theatlantic.com/magazine/archive/2016/11/how-america-outlawed-adolescence/501149/.
27. Disrupting school was first criminalized in the late 1960s in response to high-school and college civil rights demonstrations. *See id.*
28. Merkwae, *supra* note 1, at 154 (internal citations omitted).
29. *See* Richard Fausset & Ashley Southall, *Video Shows Officer Flipping Student in South Carolina, Prompting Inquiry*, N.Y. Times (Oct. 26, 2015), https://www.nytimes.com/2015/10/27/us/officers-classroom-fight-with-student-is-caught-on-video.html.
30. Shea M. Rhodes, Villanova Univ. Charles Widger Sch. of Law Inst. to Address Commercial Sexual Exploitation, The Spring Valley High Incident: The Impact of Overpolicing in Schools on Female Students of Color 1 (2015).
31. *See* Rick Brundrett, *Lawmaker Wants Better Tracking of Disturbing-School Offenses*, The State (Nov. 30, 2015), http://www.thestate.com/news/local/article47251855.html.
32. Deanna Pan & Paul Bowers, *Criminal Offense Or Adolescent Misbehavior? 'Disturbing Schools' Blurs The Line*, The Post & Courier (Aug. 6, 2016), http://www.postandcourier.com/archives/criminal-offense-or-adolescent-misbehavior-disturbing-schools-blurs-the-line/article_dc56c01c-efe1-5bbb-bb73-7d266cc72bc0.html.
33. *See* Redfield & Nance, *supra* note 2 (describing a "paradigm shift" in which behavior that was previously dealt with through "trips to the principal's office" can "now result in criminal prosecution and records for children ages 10 through 16."). *See also* Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 9 (observing that because disturbing school is a crime in Washington, "there is no legal line between school discipline and criminal activity" in the state).
34. *See* Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 1, 13.

35. *See* Ripley, *supra* note 26.

36. *See* Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 11.

37. Letter from Steven Brown, Exec. Dir., Am. Civil Liberties Union of R.I, *supra* note 18, at 2 (noting that incident reports from Rhode Island schools showed "many examples of escalation of minor infractions (such as wearing a hat in violation of a school dress code) into arrests for open-ended crimes like disorderly conduct").

38. *See* Matthew T. Theriot, *School Resource Officers and the Criminalization of Student Behavior*, 37 J. of Crim. Just. 280, 282 (2009).

39. Misha Inniss-Thompson, Summary Of Discipline Data For Girls In U.S. Public Schools: An Analysis From the 2013-14 U.S. Department of Education Office for Civil Rights Data Collection, National Black Women's Justice Institute (2017).

40. *See* Child Trends Databank, High School Dropout Rates: Indicators of Child and Youth Well-Being (Nov. 2015); Monique W. Morris, African Am. Policy Forum, Race, Gender, and the School-to-Prison Pipeline: Expanding Our Discussion to Include Black Girls 5 (2012).

41. The term "dropout" is a direct quote from this study. The authors of this report refrain from using this term, because it can imply that the student voluntarily chose to leave school without taking into consideration the context for that decision and the external factors that affect a young person's sense of safety and ability to thrive in school.

42. *See* Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 12.

43. *See* Monique Morris, Pushout: The Criminalization of Black Girls in Schools (2016).

44. Nat'l Women's Law Ctr., Let Her Learn: A Toolkit to Stop School Pushout for Girls of Color 1 (2016). One in four female students in the United States is Latina/Hispanic. *See* Patricia Gándara, UCLA & the Obama White House Initiative on Educ. Excellence for Hispanics, Fulfilling America's Future: Latinas in the U.S. (2015). They comprise 23.9% of girls referred to law enforcement and 22.8% of girls arrested on campus. Nat'l Women's Law Ctr., Let Her Learn: Stopping School Pushout for Girls of Color 15 fig.6 (2017) (citing Dep't of Educ. 2013-14 Civil Rights Data Collection). While data reflect that Latina students are not overrepresented among female students who are in contact with law enforcement in schools, there is concern among advocates that these numbers are under-reported due to the subjective nature of reporting for Latina students. *See* Maria F. Ramiu & Dana Shoenberg, *Strategies for Serving Hispanic Youth, in* Disproportionate Minority Contact Technical Assistance Manual (U.S. Dep't of Justice, Office of Juvenile Justice & Delinquency Prevention, ed., 2009).

45. Nat'l Women's Law Ctr., Let Her Learn: A Toolkit, *supra* note 44, at 1. Both teachers and SROs punish students of color at higher rates than white students for subjective offenses. While white students and students of color are charged with objectively determined offenses, such as using a weapon, at roughly similar rates, students of color are much more likely to be charged with subjective offenses, like disrespectful or disruptive behavior. Taken together, students of color are suspended and expelled based on non-criminal disciplinary charges. *See* Karen Dolan, Inst. for Policy Studies, It's Time to Get Cops out of Schools (Apr. 12, 2016) ("In schools where SROs are allowed to arrest or refer children to the juvenile justice system, kids are getting criminal records for low-level status offenses — that is, offenses that are only illegal because of their status as a juvenile, including wildly subjective charges like 'disruptive behavior'"); U.S. Dep't of Educ., Guiding Principles: A Resource Guide for Improving School Climate and Discipline i-ii (Jan. 2014); James & McCallion, *supra* note 4, at 23-24; Merkwae, *supra* note 1, at 168-72 (discussing why the discretion given to SROs leads to students of color and students with disabilities being disproportionately charged, arrested, suspended, and expelled); Am. Civil Liberties Union of Wash. Found., *supra* note 6, at 10; Jason Langberg & Angela Ciolfi, Legal Aid Justice Ctr., Protecting Childhood: A Blueprint for Developmentally Appropriate School Policing in Virginia 8 (Jan. 2016); Justice Policy Inst., *supra* note 1, at 21; The Advancement Project, Test, Punish, and Push Out: How "Zero Tolerance" and High-Stakes Testing Funnel Youth into the School to Prison Pipeline 9-10 (March 2010).

46. *See* Edward W. Morris & Brea L. Perry, *Girls Behaving Badly? Race, Gender, and Subjective Evaluation in the Discipline of African American Girls*, Soc. of Educ. (Feb. 2017); Jamilia J. Blake et al., *The Role of Colorism in Explaining African American Females' Suspension Risk*, Sch. Psych. Q. (2016).

47. *See* Nat'l Women's Law Ctr., Let Her Learn: A Toolkit, *supra* note 44, at 13 fig.5.

48. *See* Morris & Perry, *supra* note 46, at 135, 144.

49. *See* Asha K. Unni, Jamilia J. Blake, Phia Salter, Kayce Solari-Hall & Verna Keith, The Objectification of Black Youth: Racial and Gender Differences un Decisions about School Dress-Code Violations (Aug. 2016), https://www.researchgate.net/publication/306393349_The_objectification_ of_Black_youth_Racial_and_gender_differences_in_decisions_about_school_dress_code_violations.

50. Kay Lazar, *Black Malden Charter Students Punished for Braided Hair Extensions*, Boston Globe (May 12, 2017), https://www.bostonglobe.com/metro/2017/05/11/black-students-malden-school-who-wear-braids-face-punishment-parents-say/stWDlBSCJhw1zocUWR1QMP/story.html.

51. Redfield & Nance, *supra* note 2, at 17 ("disproportionality is evident in differential treatment by gender where African-American girls are more often and more severely disciplined than other girls, most often, for "subjectively defined behaviors, or behaviors considered inappropriate by educators.").

52. Nat'l Women's Law Ctr., Let Her Learn: A Toolkit, *supra* note 44, at 2.

53. *See, e.g.,* Brundrett, *supra* note 31 (noting that South Carolina's Department of Juvenile Justice does not maintain records of students' race in disturbing-schools cases).

54. Recognizing this gap in data collection, the COPS Office has recommended that schools develop more formal checks and balances and data collection and analysis on school discipline. *See* U.S. Dep't of Justice, Office of Community Oriented Policing Services, *supra* note 22.

55. An appreciative inquiry (AI) is the cooperative search for the best in people, their organizations, and the world around them. It involves systematic discovery of what gives a system 'life' when it is most effective and capable in economic, ecological, and human terms. Appreciative-inquiry research is based on 'unconditional positive questions,' which are designed to identify how to strengthen the positive potential of the target / participant. *See* David L. Cooperrider, & Diana Whitney, *Appreciative Inquiry: A Positive Revolution in Change, in* The Change Handbook (Peggy Holman & Tom Devane eds., 2005).

56. Officers who are working in schools but not assigned to a specific school or district are referred to as other law enforcement in schools.

57. Clark Moustakas, Phenomenological Research Methods (1994).

58. *Id. See also* Chi-Shiou Lin, *Revealing the 'Essence' of Things: Using Phenomenology in LIS Research*, 4 Qualitative and Quantitative Methods in Libraries, 469 (2013).

59. In this report, we use "Black" and "African-American" interchangeably to refer to people of Sub-Saharan African descent, alone or in combination with other racial and ethnic categories.

60. Racially isolated schools are "intensely segregated" schools, where 90-100 percent of the student body is comprised of students of color.

61. John W. Creswell, Research Design: Qualitative, Quantitative, and Mixed Methods Approaches (2d ed., 2003).

62. Some localities also require SROs to renew training at the start of each school year. The National Association of School Resource

Officers (NASRO) provides training at various levels to SROs, as do non-law-enforcement organizations, such as Strategies for Kids. Local police departments can provide training and/or supplement it with additional training specific to local needs.

63. See textbox on "Bias: Beyond SROs".
64. *See* Morris, *supra* note 43.
65. As stated previously, this report should not be interpreted as an endorsement of the presence of law enforcement in schools.
66. Healing-centered responses are activities and interventions that prioritize repairing harm and/or facilitating a whole-person response to a crisis or condition. Healing-informed practices in schools engage the student's emotional wellbeing in order to facilitate behaviors that provide a safe space for students to learn.
67. *See* Elliot Spagat, *IACP President Apologizes for 'Historical Mistreatment' of Minorities*, Associated Press (Oct. 18, 2016).
68. *See* Tom Jackman, *U.S. Police Chiefs Group Apologizes for 'Historical Mistreatment' of Minorities*, Wash. Post, Oct. 17, 2016, https://www.washingtonpost.com/news/true-crime/wp/2016/10/17/head-of-u-s-police-chiefs-apologizes-for-historic-mistreatment-of-minorities/?utm_term=.9a93442b7c0f.
69. *See* Fran Sterling, U.S. Dep't of Justice Office of Community Oriented Policing Services, Beyond the Badge - Profile of a School Resource Officer: A Guide for Communities 19-21 (2016).
70. U.S. Dep't of Justice & U.S. Dep't of Education, Safe School-based Enforcement through Collaboration, Understanding, and Respect SECURe Local Implementation Rubric (undated), https://www2.ed.gov/documents/press-releases/secure-implementation.pdf .
71. U.S. Dep't of Justice Office of Community Oriented Policing Services, Fact Sheet: Memorandum of Understanding, 2 (Sept. 2013).
72. *See* U.S. Dep't of Justice Office of Community Oriented Policing Services, *supra* note 22.
73. Nat'l Ass'n of Sch. Resource Officers, Basic SRO Course Manual 7, 9 (emphasis in original).
74. Police Found., Defining the Role of School-Based Police Officers 4-5 (2016).
75. The Denver school population totals approximately 80,000 students. According to recent data collected by the U.S. Department of Education, 58.4% are Hispanic, 19.8% are White; 14.6% are Black; 3.3% are Asian; 0.7% are American Indian; and 3.1% are counted as "other." Nearly three-fourths (72.49%) of students in Denver public schools are eligible for free and reduced-price meals. *See* U.S. Dep't of Educ., *Advancing Student Achievement Through Labor-Management Collaboration: Denver Public Schools*, https://www.ed.gov/labor-management-collaboration/conference/denver-public-schools (last visited June 28, 2017).
76. "Restorative approaches" refers to processes by which individuals involved in a crime or harmful incident are brought together to repair their relationship. Restorative justice is a paradigm shift away from "punishment" and toward a collective development of actions that would hold individuals accountable for the harm they have committed, toward the goal of repairing the relationships between those involved. The process emphasizes tending to obligations around the harm that has been committed and engaging stakeholders in the process of collectively developing a response to those harms. *See* Howard Zehr, The Little Book of Restorative Justice (2002).
77. *See* Intergovernmental Agreement between Denver Public Schools and the Denver Police Department (2013), http://www.dignityinschools.org/sites/default/files/SRO%20MOU%20Denver-Padres%20y%20Jovenes%20Unidos%202013.pdf.
78. *See* Memorandum of Understanding between Richmond Police Department and Richmond Public Schools Regarding the Duties of School Resource Officers (Aug. 2016), https://acluva.org/wp-content/uploads/2016/08/Appendix-C-SRO-MOU.pdf.
79. *See* Judge Steven Teske, School-Justice Partnership, Developing a Memorandum of Understanding (MOU) for School-Justice Partnerships: Technical Assistance Tools 14 (2017), https://www.ncjfcj.org/sites/default/files/Toolkit_for_Creating_an_MOU_Clayton_County_School-Justice_Toolkit.pdf.
80. *See id.*
81. The data collected is available at: Broward County Pub. Schools, Eliminating the School to Prison Pipeline (2015), http://www.browardprevention.org/wp-content/uploads/2016/07/SY-2016-Eliminating-School-to-Prison-Pipeline.pdf.
82. *See* Broward County Collaborative Agreement on School Discipline, Article IV (2013), http://b.3cdn.net/advancement/db79d1858f-4c5f3e13_7hm6bq78b.pdf.
83. *See* Colo. Rev. Stat. § 22-32-109.1 (2012).
84. *See id.*
85. *See* Trevor Fronius et al., WestEd Justice & Prevention Research Ctr., Restorative Justice in U.S. Schools: A Research Review (Feb. 2016); *see, e.g.*, Baltimore City School Police, Specialized Training Designed for Interacting with Youth (2016), http://www.baltimorecityschools.org/cms/lib/MD01001351/Centricity/Domain/8818/2016-SchoolPoliceTraining.pdf.
86. *See* Fronius et al., *supra* note 85.
87. *See* Stoneleigh Found., Keeping Kids in School and Out of Court: Philadelphia Police School Diversion Program (2016); Molly McCluskey, *This Former Philadelphia Cop Had an Incredibly Simple Plan to Keep Kids out of Prison. Don't Arrest Them,* Wash. Post (March 30, 2017), https://www.washingtonpost.com/news/inspired-life/wp/2017/03/30/this-former-philadelphia-cop-had-an-incredibly-simple-plan-to-keep-kids-out-of-prison-dont-arrest-them/?utm_term=.fbd3dd11a6b0.
88. *See* Broward County Pub. Schools, *supra* note 81.
89. *See* Maura McInerney & Amy McKlindon, Educ. Law Ctr., Unlocking the Door to Learning: Trauma-Informed Classrooms & Transformational Schools (Dec. 2014); Substance Abuse & Mental Health Services Admin., *Walla Walla: Collective Action and Data Drive Trauma-Informed Change* (Aug. 25, 2016), https://blog.samhsa.gov/2016/08/25/walla-walla-collective-action-and-data-drive-trauma-informed-change/#.WUu9oRPyvOQ. For a discussion of the results, see also Melissa Hellman, *This Town Adopted Trauma-Informed Care — And Saw a Decrease in Crime and Suspension Rates,* Yes! Magazine (Feb. 22, 2017), http://www.yesmagazine.org/people-power/this-town-adopted-trauma-informed-care-and-saw-a-decrease-in-crime-and-suspension-rates-20170222; Jane Ellen Stevens, *Children's Resilience Initiative in Walla Walla, WA, Draws Spotlight to Trauma-Sensitive School,* ACES Too High News (Oct. 7, 2014), https://acestoohigh.com/2014/10/07/childrens-resilience-initiative-in-walla-walla-wa-draws-spotlight-to-trauma-sensitive-school/; Kevin Braman, Lincoln High School Resource Officer Promoted to New Position, Walla Walla Pub. Sch. (May 2012), http://www.wwps.org/archived-articles/1458-.
90. *See* Memorandum of Understanding Between the San Francisco Police Department and the San Francisco Unified School District (Oct. 2010), http://www.fixschooldiscipline.org/wp-content/uploads/2014/10/SFPD-SRO-MOU.pdf.
91. Nat'l Ass'n of Sch. Psychologists, *Building Capacity for Student Success: Every Student Succeeds Act Opportunities* (2016), https://www.

nasponline.org/research-and-policy/current-law-and-policy-priorities/policy-priorities/the-every-student-succeeds-act/essa-implementa-tion-resources/essa-school-safety-for-decision-makers.

92.   Nat'l Ass'n of Sch. Resource Officers, *supra* note 73, at 11.
93.   Nat'l Child Traumatic Stress Network, Service Systems Brief: Creating a Trauma-Informed Law Enforcement System (Apr. 2008).
94.   *See* U.S. Dep't of Justice, Community Oriented Policing Services, *How Mental Health Training Helps School Resource Officers*, 9 Community Policing Dispatch: The E-Newsletter of the COPS Office (Feb. 2016), https://cops.usdoj.gov/html/dispatch/02-2016/mental_health_and_sros.asp.
95.   *See* Mike Gagne, *Fall River School Resource Officers Get Mental Health First-Aid Training*, Herald News (Jan. 10, 2016 at 3:27 PM), http://heraldnews.com/article/20160110/News/160119552.
96.   *See* Padres y Jovenes Unidos & Advancement Project, summary of 2013 intergovernmental agreement between dps and dpd, http://www.dignityinschools.org/sites/default/files/SRO%20MOU%20Denver-Padres%20y%20Jovenes%20Unidos%202013.pdf .
97.   U.S. Dep't of Justice, *supra* note 94.
98.   Yale Childhood Violent Trauma Ctr., *Welcome to the Childhood Violent Trauma Center*, https://medicine.yale.edu/childstudycenter/cvtc/ (last visited June 28, 2017).
99.   Nat'l Ass'n of Sch. Resource Officers, *supra* note 73, at 16.
100.   *See* Jason A. Okonofua, David Paunesku & Gregory M. Walton, *Brief Intervention to Encourage Empathic Discipline Cuts Suspension Rates in Half Among Adolescents*, 113 Proc. of the Nat'l Acad. of Sciences of the United States of America 5221 (May 10, 2016).
101.   Aishatu R. Yusuf, Angela Irvine & James Bell, *Reducing Racial Disparities in School Discipline: Structured Decision-Making in the Classroom, in* Inequity in School Discipline-Research and Practice to Reduce Disparities (Russell Skiba, Kavitha Mediratta & M. Karega Rausch eds., 2016).
102.   *See id.*
103.   Nat'l Ass'n of Sch. Resource Officers, *supra* note 73, at 13.
104.   Ben Chapman, *New Program Connects NYPD Cops and Elementary School Kids in the Classroom*, N.Y. Daily News (Apr. 25, 2016), http://www.nydailynews.com/new-york/education/new-program-connects-nypd-cops-elementary-school-kids-article-1.2613146.
105.   More information available at http://strategiesforyouth.org/for-police/how-to/how-to-effective-conversation/.
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