



Report from a Study on

*TRANSLATING INTO OPERATIONAL REALITY A SET OF  
HIGH-LEVEL, BOARD-ADOPTED RECOMMENDATIONS  
RELATED TO OVERREPRESENTATION*

Produced by the

Superintendent's Educational Opportunities Advisory Council – Phase II

For

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Superintendent of Schools  
Clark County School District

November 26, 2013



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## I. EXECUTIVE SUMMARY

This describes the proceedings and findings of a Superintendent-appointed committee of 21 individuals that met from May 2, 2013 to November 7, 2013 to address one question.

*What changes in policy, procedure, or structure will make it possible to translate into operational reality a set of 10 high-level recommendations that the Board adopted on March 6, 2013 which are designed to mitigate overrepresentation by gender or race/ethnicity in discipline-related actions?*

Ten recommendations that the Board of Trustees adopted on March 6, 2013 form the foundation for work:

1. **Improve Data Quality:** Data collection related to suspension and expulsion will be consistent, reliable, standard across schools, annually available to the public, and will reflect SEOAC intent.
2. **Reduce Overrepresentation:** Impose a moratorium on suspensions and expulsions except for the Big 5 offenses, at the Superintendent's discretion as to terms, with a caveat that student-on-student assault and battery that result in injury now fall under the Big 5 heading.  
Note: The word "terms" refers to how swiftly the moratorium is implemented. That is, will it be immediately imposed or will it be phased in and if so over what period of time? Phase-in will ensure the District complies with relevant discipline-related laws, regulations, and policies.
3. **Develop Cultural Competency:** Mandatory professional development on cultural competency will be provided for all new teachers and new administrators.
4. **Extend Cultural Competency:** At each school each year, at least one professional development day will be devoted to cultural competency.
5. **Gauge the Benefit of Professional Development:** Implement an evaluation procedure to identify the impact of professional development that is intended to promote cultural competency.
6. **Refine What We Mean by Cultural Competency:** Articulate standards and expectations of professional responsibility related to cultural competency.
7. **Provide Early Intervention:** Restructure Title I to focus on early interventions with most at-risk students.  
Note: The term "early intervention" could refer to early in a school year or in any grade and not just the early grades. It is also plausible that the term "early intervention" could refer to the introduction or development of an early warning system; such a system would identify behaviors that research shows could lead to suspensions, expulsions, and/or behavioral school placement, if not corrected.
8. **Enhance Early Literacy:** K-3 students who are not-yet-literacy-proficient receive appropriate interventions.
9. **Provide Better, Earlier, and Different Alternatives to Suspension and Expulsion:** During the moratorium period, investigate for possible implementation various models of tiered-intervention disciplinary systems that include parent notification policies, e.g., the Baltimore model.
10. **Monitor Progress:** Appoint a CCSD administrator who is responsible for monitoring and publicly reporting (at least quarterly) the implementation of these recommendations.

## II. DESCRIPTION OF THE CHARGE, SUCCESS CRITERIA, DELIVERABLE, AND TERMS

### Charge:

On March 6, 2013, the Board of School Trustees in the Clark County School District accepted a report prepared by the Superintendent's Educational Opportunities Advisory Council (SEOAC) that was titled "Overrepresentation by Gender, Race/Ethnicity, or Disability in Discipline-Related Actions and/or Special Education Placement." Included were 10 recommendations. Based on studies conducted by Vanderbilt University showing that black students attending secondary school in the Clark County School District are 2.7 times more likely than their counterparts in other groups to be expelled, the 10 high-level recommendations were designed to mitigate and remedy this undesired overrepresentation. The March 6, 2013 report from SEOAC also included findings from the Vanderbilt study showing that black students are 2.2 times more likely than students in other groups to be suspended from secondary school in the District. The Board approved these 10 high-level recommendations at the March 6, 2013 meeting.

On March 26, 2013, the Superintendent invited 21 individuals to convene to address the following charge:

*By November 2013, present the Superintendent with proposed changes in policy, procedure, or structure that allow CCSD to mitigate and remedy overrepresentation (by gender or race/ethnicity) in discipline-related actions by translating a set of 10 high-level SEOAC recommendations into operational reality.*

The team was called the Superintendent's Educational Opportunities Advisory Council for Phase II (SEOACII).

### Success Criteria:

Options that SEOACII generates and forwards to the Superintendent will:

- Reflect consensus;
- Are delivered on time and to specification;
- Conform to requirements of law, contract, and policy;
- Incorporate actions that are achievable within the existing resources;
- Have the effect of supporting schools in efforts to ensure every student is "College and Career Ready";
- Are reasonably designed to achieve the desired effect of eliminating undesirable over-representation;
- Make claims that are defensible, valid for their purpose, and based on reliable information.

### Deliverable:

- Actionable recommendations that provide direction to guide the conduct of students and staff in ways that promote the safety and engagement of all students.

### Terms:

- This work will be referred to simply as "over-representation" or "disproportionality" or "rates".
- "Discipline-related actions" means suspensions, expulsions, and referrals to alternative schools.

### III. MEMBERSHIP

Tami Bass	Attorney, United Family Services and Instructor, College of Southern Nevada
Richard Boulware	Vice-President, National Association for the Advancement of Colored People
Dr. Andre Denson	Chief Educational Opportunity Officer and SEOACII Co-Chair
Jeanne Donadio	High School Principal
Paul Garbiso	Academic Manager
Dr. Jeff Geihs	Academic Manager
Monica Lang	Middle School Principal
Susie Lee	Board President, Communities in Schools of Nevada
Maribel McAdory	Elementary School Principal
Kevin McPartlin	High School Principal
Dr. Greta Peay	Equity and Diversity Education Department
Lisa Primas	High School Principal
Antonio Rael	High School Principal and SEOACII Co-Chair
Dr. Zachary Robbins	Middle School Principal
Bevelyn Smothers	Middle School Principal
Kenneth Sobaszek	High School Principal
Kim Wooden	Deputy Superintendent, Educational and Operational Excellence Unit
Krista Yarberry	Elementary School Principal
Dr. Ken Turner	Special Assistant to the Superintendent's and SEOACII Facilitator

Note: While the team that the Superintendent convened and charged with this work initially included 21 individuals, at the conclusion of the work the membership included 19 individuals. Two of the original members departed from the committee. One retired in the interim (Assistant Superintendent Brad Waldron) and the other moved from the Clark County School District to employment in another district (Middle School Principal Roger Gonzales). Thus, the final membership total was 19.

## IV. WORK SCHEDULE

<p>Thurs., May 2,</p> <p>10:00 am – noon</p> <p>Framing the Work: Beliefs to Guide Action</p>	<p>Wed., May 8,</p> <p>2:00 pm – 4:00 pm</p> <p>Measuring Success and Improving Data Recommendation 1 and 5</p>	<p>Thurs., June 20,</p> <p>10:00 am – noon</p> <p>Reducing Over- representation: Moratorium Recommendation 2</p>	<p>Thurs., June 27,</p> <p>10:00 am – noon</p> <p>Better, Different &amp; Earlier Alternatives to Expulsion Recommendation 9</p>	<p>Thurs., July 25,</p> <p>10:00 am – noon</p> <p>Reducing Over- representation: Moratorium and Alternatives to Expulsion Recommendation 2 and 9</p>	<p>Thurs., Aug. 1,</p> <p>10:00 am – noon</p> <p>Literacy and Early Intervention Recommendation 7 &amp; 8</p>	<p>Thurs., Oct.3,</p> <p>10:00 am – noon</p> <p>Define and Extend “Cultural Competency” Recommendation 3, 4, 6</p>	<p>Thurs., Nov. 7,</p> <p>10:00 am – noon</p> <p>Avenues to Gauge and Monitor Progress Recommendation 10</p>
<p>What is (and is not) our charge?</p> <p>What are our operating agreements?</p> <p>How do we reach agreement?</p> <p>What are our work streams?</p> <p>What do we mean by terms?</p> <p>How is our work organized?</p> <p>What should we know about work to date, trends, and issues?</p>	<p>With what yardstick does SEOAC gauge its efforts?</p> <p>What is the universe of possible indicators of SEOAC success?</p> <p>For which of these possible indicators do we have valid and reliable data?</p> <p>How do we answer Gates question (of what value is 1 hour of PD)?</p> <p>What success criteria are used?</p> <p>What will SEOAC – Phase II forward as recommendations?</p>	<p>What no-fault factors drive moratorium discussion (legal issues, training requirements, practical realities, etc.)?</p> <p>What are the pros and cons related to treating suspensions and expulsions separately or as one?</p> <p>What do we need to investigate before any recommendation can be made concerning a phase-in?</p>	<p>What lessons can be learned based on success others have had reducing suspensions or expulsion using tiered-models of intervention, parent notification (e.g., Richmond or Baltimore) or Star-On in CCSD?</p> <p>How do CCSD rates compare to districts of similar size that have better results (Broward, Houston, and Miami-Dade)?</p> <p>Which of the most promising practices are best suited to us?</p>	<p>Given what we learned from SEOAC – Phase II, what modifications shall SEOAC consider about the moratorium?</p> <p>What allowance does SEOAC recommend about a moratorium phase-in?</p> <p>Once a moratorium is in place, how will improvement be gauged?</p> <p>What will SEOAC – Phase II forward as recommendations?</p>	<p>Which early warning signals are the most valid &amp; reliable precursors of suspension or expulsion?</p> <p>For which early warning signals do we have data?</p> <p>Among the possibilities that exist for re-purposing Title I funds, which are permissible (given the obligation to observe the “supplement, not supplant” provision)?</p>	<p>What is the universe of options for defining and extending “cultural competency”?</p> <p>What are the most promising?</p> <p>Who should know what and how well (with respect to “cultural competency”)?</p> <p>What evidence would we accept that demonstrates that learning has occurred?</p> <p>What will SEOAC – Phase II forward as recommendations?</p>	<p>In which domains are data available that are comparable from school-to-school?</p> <p>What are viable monitoring and/or reporting mechanisms?</p> <p>What unit(s) of analysis should be considered for reporting (student, grade, school, performance zone, district)?</p> <p>How will quarter-to-quarter and year-to-year improvement be gauged?</p>

## V. ITEM BY ITEM SUMMARY OF PROPOSAL DESIGNED TO TRANSLATE 10 HIGH-LEVEL RECOMMENDATIONS INTO OPERATIONAL REALITY

Recommendations within a Feb. 20, 2013 SEOAC report titled <i>“Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>	Proposals that will be included in a forthcoming SEOAC report titled <i>“Proposals for Translating into Operational Reality 10 High-Level Recommendations from SEOAC that are Designed to Mitigate and Eliminate Undesired Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>
1. IMPROVE DATA QUALITY: Data collection related to suspension and expulsion will be consistent, reliable, standard (across schools), annually available to the public, and will reflect the intent of SEOAC recommendations.	<p><b>Consensus emerged</b> from the May 8, 2013 meeting:</p> <ul style="list-style-type: none"> <li>a) Implement single system of record. Schools enter all discipline-related data. Replaces SASI etc.</li> <li>b) Implement a data governance framework or “rules of the road” for data storage/retrieval</li> <li>c) Adopt “input masks” that require end users to enter data that fits the prescribed format</li> <li>d) Schools and staff are accountable for using the single system of record</li> <li>e) Training is provided on the systems that are used in all schools to enter discipline-related data</li> <li>f) Audit quality to gauge accuracy/comparability/consistency of data on expulsion/suspension</li> <li>g) Report out on the accuracy, comparability, and consistency of data on suspension and expulsion</li> <li>h) Track movement of students from school-to-school (with records that follow the student)</li> </ul>
2. REDUCE OVERREPRESENTATION: Impose a moratorium on suspensions and expulsions except for the Big 5 offenses, at the Superintendent’s discretion as to terms, with a caveat that student-on-student assault and battery that result in injury now fall under the Big 5 heading	<p><b>Consensus emerged</b> from the June 27, 2013 meeting. The following steps are needed prior to the start of a moratorium. These appear in a rank order from most-to-least important:</p> <ul style="list-style-type: none"> <li>a) Communicate with staff and community in order to collaborate and build awareness</li> <li>b) Identify and implement needed support structures including alternative discipline interventions</li> <li>c) Define key terms like “suspension” and “expulsion”</li> </ul> <p>Note: Suggestions about the timing of professional development were sent to a “parking lot”; all exclusionary practices are viewed to have an undesired academic impact of some sort.</p> <p><b>Consensus emerged</b> from July 25, 2013 meeting as to definitions of “suspension” and “expulsion”:</p> <ul style="list-style-type: none"> <li>a) “Suspension” means temporary removal from a school (including RPC) for any period of time</li> <li>b) “Expulsion” means permanent removal from a school building and/or referral to behavior school</li> </ul>
3. DEVELOP CULTURAL COMPETENCY: Mandatory professional development on cultural competency will be provided for all new teachers and administrators.	<p><b>Consensus emerged</b> from the October 3, 2013 meeting to:</p> <ul style="list-style-type: none"> <li>a) Train from the “top down”</li> <li>b) Include role playing as a part of training</li> <li>c) Use existing resources; identify individual staff person at each site to coordinate communication</li> </ul>
4. EXTEND CULTURAL COMPETENCY: At each school each year, at least one professional development day will be devoted to cultural competency.	<p><b>Consensus emerged</b> from the October 3, 2013 meeting to:</p> <ul style="list-style-type: none"> <li>a) Train from “top down”</li> <li>b) Include role playing as a part of training</li> <li>c) Use existing resources; identify individual staff person at each site to coordinate communication</li> <li>d) Ensure provisions are made to gather perceptions of students before and after training</li> <li>e) Provide for a neutral facilitator who is available for the initial roll-out of training at each site</li> <li>f) Use data to rank schools with respect to the cultural competency of staff (if resources permit)</li> <li>g) Ensure the leadership team has the opportunity to “opt into” training opportunities</li> </ul>



Recommendations within a Feb. 20, 2013 SEOAC report titled <i>“Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>	Proposals that will be included in a forthcoming SEOAC report titled <i>“Proposals for Translating into Operational Reality 10 High-Level Recommendations from SEOAC that are Designed to Mitigate and Eliminate Undesired Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>
5. GAUGE BENEFIT OF PROF'L DEVELOPMENT: Implement evaluation procedure to identify impact of PD that is intended to promote cultural competency	<p><b>Consensus emerged</b> from May 8, 2013 meeting to gauge the impact of professional development by relying on observable behaviors; this will be accomplished via classroom walkthroughs.</p> <p><b>Consensus emerged</b> from the July 25, 2013 meeting to also gauge the impact of professional development intended to promote cultural competency through one other method. That is a survey of staff opinion.</p> <p>Note: SEOAC urged that another term be used in place of “survey.” Suggestions that were offered included “school assessment” or “assessment of school culture and climate.” Consensus also emerged to recommend that the District pursue using (in some form) the <i>5Essentials</i> System. That system is a school culture and climate framework that was developed by and based on research done by the University of Chicago. It uses data from students, staff, and community to characterize the quality of the school culture and climate. Results are available on an interactive web-based format.</p>
6. REFINE WHAT WE MEAN BY CULTURAL COMPETENCY: Articulate standards and expectations of professional responsibility related to cultural competency	<p><b>Consensus emerged</b> from the October 3, 2013 meeting to embed the following steps within the existing school improvement planning process that all schools now conduct:</p> <ol style="list-style-type: none"> <li>Overall aim: Ensure staff has cultural competency to meet instructional needs of diverse learners</li> <li>Take action needed to ensure common tool is used by schools to gauge staff cultural competency</li> <li>School develops a profile of school staff strengths and weaknesses (based on a need assessment)</li> <li>School uses Bennett model to identify where school is and needs to be (based on the staff profile)</li> <li>Principal identifies cultural competency goal for school (based on need assessment/staff profile)</li> <li>Each school develops a goal of improving culture and climate</li> <li>The District adopts a measure to gauge improvement concerning cultural competency</li> <li>Each school develops a plan for achieving their goal</li> <li>Each school completes training specified by the plan</li> <li>The District will report out on cultural competency measures at the school level.</li> </ol>
7. PROVIDE EARLY INTERVENTION: Restructure Title I to focus on early interventions with the most at-risk student population	<p><b>Consensus emerged</b> from the August 1, 2013 meeting:</p> <ol style="list-style-type: none"> <li>Expand Positive Behavioral Intervention and Support (from 125 schools to all)</li> <li>Specify set percentage of school-based discretionary budget to be expended for early intervention</li> <li>Conduct annual poll identifying students at risk of disengagement (see Clifton, <i>Coming Job War</i>)</li> <li>Extend the learning time for students who struggle academically</li> <li>Increase parent engagement and notification</li> <li>Revise CCSD behavior guidelines so the system is tiered and provides more-structured guidance: <ul style="list-style-type: none"> <li>Set forth levels of student behavior and a corresponding range of options for adult response</li> <li>Parent notification</li> <li>Administrator discretion is more-precisely described</li> <li>Provision for a (mandatory) lower-tier adult response before any higher-tier adult response</li> </ul> </li> </ol>

Recommendations within a Feb. 20, 2013 SEOAC report titled <i>“Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>	Proposals that will be included in a forthcoming SEOAC report titled <i>“Proposals for Translating into Operational Reality 10 High-Level Recommendations from SEOAC that are Designed to Mitigate and Eliminate Undesired Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>
8. ENHANCE EARLY LITERACY: Students in K-3 who are not-yet-proficient in literacy will receive appropriate interventions	<p><b>Consensus emerged</b> from the August 1, 2013 meeting:</p> <p>In addition to new literacy-support steps that the District is poised to undertake, do the following:</p> <ol style="list-style-type: none"> <li>Assess and monitor the cultural proficiency of professional staff</li> <li>Analyze the adequacy of current literacy efforts to identify areas of need as well as strength</li> <li>Determine whether and how patterns of literacy are associated with trends in discipline</li> <li>Assess and monitor differences in terms of teacher expectation of student performance</li> <li>Urge expansion of SEOAC recommendations to include not just K-3 students but Pre-K students</li> </ol>
9. PROVIDE BETTER, EARLIER, AND DIFFERENT ALTERNATIVES TO SUSPENSION AND EXPULSION: During the moratorium period, investigate for possible implementation various models of tiered-intervention disciplinary systems that include parent notification policies, e.g., the Baltimore model	<p><b>Consensus emerged</b> from June 27, 2013 meeting about what is needed prior to a moratorium:</p> <ol style="list-style-type: none"> <li>Implement a tiered system of prevention and intervention, e.g., a 3-tier system</li> <li>System-wide professional development (including innovative methods to train staff)</li> <li>District adopts (as soon as possible) a clear public messaging strategy</li> </ol> <p><b>Consensus emerged</b> from July 25, 2013 meeting about necessary steps during moratorium:</p> <ol style="list-style-type: none"> <li>A monitoring system that includes some provision for midterm adjustments</li> <li>Systematic and comprehensive follow-up at sites after first round of professional development</li> <li>Actions to shift from a punitive culture to a culture of prevention</li> <li>Create more accountability/responsibility for sustaining a culture of prevention and intervention</li> <li>Implement provisions during and after the moratorium launch to enhance cultural competency</li> <li>Collection, analysis, and reporting of data to gauge the impact of moratorium efforts</li> </ol> <p><b>Consensus emerged</b> from July 25, 2013 meeting regarding what schools can do in lieu of suspension:</p> <ol style="list-style-type: none"> <li>Conference between a mediator, teacher, and student <ol style="list-style-type: none"> <li>Mediator works to determine root cause</li> <li>If the root cause is: <ul style="list-style-type: none"> <li>Academically based, the subsequent intervention involves a team of academic responders</li> <li>Socially based, the subsequent intervention involves a team of peer responders</li> <li>Emotionally based, the subsequent intervention involves a team of behavior responders</li> </ul> </li> <li>Mediator meets with responders, teachers, student to develop final recommendations</li> </ol> </li> <li>Reliance on tiered interventions</li> <li>Professional development to enhance student-teacher relationships</li> <li>Each student, each day receives a specific and positive (face-to-face) affirmation</li> <li>Engage community resources to support school culture that affirms individual students</li> <li>Student remains in school but academics take place in separate classroom temporarily (virtually or otherwise) as long as there is monitoring for disproportionality</li> <li>On-site behavior school (StarOn) or a similar program as long as there is monitoring for disproportionality</li> <li>Behavior Team referral for “frequent flyers” (students who chronically experience difficulty)</li> <li>Grant each principal option to have flex and autonomy over budget to support these interventions of have access to resources to make this possible</li> <li>Principals meet at beginning of the year with each teacher individually to set and agree on the school philosophy and approach to discipline</li> </ol>

Recommendations within a Feb. 20, 2013 SEOAC report titled <i>“Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>	Proposals that will be included in a forthcoming SEOAC report titled <i>“Proposals for Translating into Operational Reality 10 High-Level Recommendations from SEOAC that are Designed to Mitigate and Eliminate Undesired Overrepresentation by Gender or Race/Ethnicity in Discipline-Related Actions”</i>
	Note: With respect to “g” above, SEOAC members offered several examples from personal experience that are similar to StarOn. These included the following programs; AFTER (Academically Focused Time of Enrichment Redirection); FOCUS (Program to refocusing behavior); and BIC (Behavior Intervention Center). The last of these (BIC) utilizes four top-performing teachers in the school to teach BIC students in the core subject areas.
10. MONITOR PROGRESS: Appoint administrator to monitor and report at least quarterly on implementation of the recommendations	<b>Consensus emerged</b> from November 7, 2013 meeting related to monitoring and reporting progress: a) At the discretion of the Superintendent, progress will be reported publicly by the same administrator who the Superintendent appoints to monitor the status of implementation efforts.

## VI. SUPPORTING ANALYSIS

This report builds on analyses conducted by the Clark County School District staff. A series of 5 tables are enclosed that summarize the scholarly literature on the topic at hand. In every case, entries appearing within a table are attributed to the source. The full text of the source document is was made available to SEOACII members. Citations for all table entries appear as footnotes for each table. The section of this report titled “References” describes how the reader can electronically access the full text of any or all of the cited sources.

One caveat repeated here originally appeared in a SEOAC report that set forth the 10 high-level recommendations that the Board adopted on March 6, 2013. The caveat concerns data that formed the basis for inferences made by members of SEOAC and SEOACII. The caveat appears in italics.

*Assembling data that permitted district-to-district and school-to-school comparisons proved to be challenging. Reasons for this include uncertainty about how other districts define, interpret, measure, and report expulsion and uncertainty about the way in which data from our own schools travels from a school to the District to a national web site like the one hosted by the U.S. Department of Education’s Office for Civil Rights (OCR).*

*A cautionary note is included. Care should be used when reviewing data in the tables that appear or when citing or reporting the data or findings in this report. Tables include data on expulsions that was drawn from the web site of the OCR. Data on expulsion are three years old (from the 2009-2010 academic year) and are no longer being collected by the OCR. Figures for expulsion are summarized in a compositional ratio. Care should be taken when interpreting these findings because “compositional statistics are easily misunderstood and often distorted” (Reschly, D., Analysis of Clark County School District 2009-2010 and 2010-2011 Discipline Outcomes by Gender, Race/Ethnicity, and Disability, July 30, 2012, p. 9). Although the figures are out of date, the figures are presented because they offer roughly comparable information on school-by-school expulsion rates. The information on expulsions is limited in usefulness because the figures do not depict current conditions and because a more-accurate descriptor (relative risk) is now available. Nevertheless, the data proved helpful to SEOAC because they provided a glimpse of district-to-district and school-to-school variability in expulsion rates.*

*In addition to expulsion data, the tables also display school-by-school rates of alternative school referrals and suspension. The Clark County School District (Education Services Division) is the source of these data. The time period for these data (2010-2011) differs from the time period for the expulsion data (2009-2010).*

*To aid in interpreting the information found in tables, a single column is found in each. The heading is “Composition Ratio.” This provides a way to compare rates between and among schools. It also provides a way to compare expulsion rates to suspension rates and to the rates of referral to alternative schools.*

## VII. REFERENCES

SEOACII took advantage of a District-provided web site where all source documents for this project were stored.

To view any of the documents SEOACII used for its work go to this web address.

The address is: <http://ccsd.net/internal/documents>

Please note that this web site houses documents used by SEOACII members. At this web location, those items can be found under the heading of “2013 Documents.” For this study, a total of 88 documents were reviewed by SEOACII members (totaling 1,512 pages).

As well, at this same web location another similar set of items can also be found under the heading of “2012 Documents.” These are the items used by members of the Superintendent’s Educational Opportunities Advisory Council that produced the original 10 high-level recommendations that the Board of School Trustees adopted on March 6, 2013. The items listed under the heading of “2012 Documents” include 90 documents totaling 918 pages.

Taken together, the efforts involving this work spanned two years and involved a review of 178 documents totaling 2,430 pages.

**CLARK COUNTY SCHOOL DISTRICT  
SUPERINTENDENT'S EDUCATIONAL OPPORTUNITIES ADVISORY COUNCIL  
Comparison of Eight Urban Districts: Review of District Discipline Policies and Exclusionary Practices  
June 20, 2013**

Table 1: Comparison of key elements of current discipline policy from eight urban school districts; student enrollment figures appear in parentheses<sup>1</sup>

	Positive behavioral interventions and supports (PBIS) program in place throughout the district	System of tiered intervention in place throughout the district	Students can return to original school after expulsion	Willful defiance can lead to out-of-school placement (i.e., soft suspendable or expellable offenses)?	Except for legally-mandated exclusion, behavior penalties rely chiefly on in-school solutions (not out-of-school penalties)	System of restorative justice in place throughout the district	District has stated that academic penalties should not apply for misbehavior (i.e., academic penalties are reserved for academic offenses such as cheating and plagiarism)	RTI ("response to instruction" or "response to intervention") in place throughout the district
New York City Department of Education (1,100,000)	Yes <sup>1</sup>	No <sup>2</sup>	No <sup>3</sup>	Yes <sup>4</sup>	QA <sup>5</sup>	Yes <sup>6</sup>		Yes <sup>7</sup>
Los Angeles Unified School District (660,000)	Yes <sup>8</sup>	Yes <sup>9</sup>	Yes <sup>10</sup>	No <sup>11</sup>	QA <sup>12</sup>	No <sup>13</sup>		Yes <sup>14</sup>
Miami-Dade County Public Schools (390,000)	QA <sup>15</sup>	Yes <sup>16</sup>		Yes <sup>17</sup>	Yes <sup>18</sup>	No <sup>19</sup>		Yes <sup>20</sup>
Clark County School District (312,000)	QA <sup>21</sup>	No <sup>22</sup>	QA <sup>23</sup>	Yes <sup>24</sup>	No <sup>25</sup>	No <sup>26</sup>		Yes <sup>27</sup>
Denver Public Schools (85,000)	QA <sup>28</sup>	Yes <sup>29</sup>		Yes <sup>30</sup>	No <sup>31</sup>	Yes <sup>32</sup>		Yes <sup>33</sup>
Baltimore City Public Schools (85,000)	Yes <sup>34</sup>	Yes <sup>35</sup>	Yes <sup>36</sup>	Yes <sup>37</sup>	Yes <sup>38</sup>	Yes <sup>39</sup>		
San Juan Unified School District (40,000)	Yes <sup>40</sup>	Yes <sup>41</sup>	Yes <sup>42</sup>	Yes <sup>43</sup>	Yes <sup>44</sup>	No <sup>45</sup>		
Oakland Unified School District (36,000)	QA <sup>46</sup>	Yes <sup>47</sup>	Yes <sup>48</sup>	Yes <sup>49</sup>	Yes <sup>50</sup>	Yes <sup>51</sup>		Yes <sup>52</sup>

<sup>1</sup> "QA" means "qualified answer"; see accompanying endnote for details.

Notice: For SEOAC's use only; not for wider circulation or distribution until entries are verified

- <sup>1</sup> New York City Dep't of Educ., *Citywide Standards of Intervention and Discipline Measures 1* (Sept. 2012), available at <http://schools.nyc.gov/NR/ronlyres/F7DA5E8D-C065-44FF-A16F-55F491C0B9E7/0/DiscCode20122013FINAL.pdf> [hereinafter *Discipline Code*]; accord New York City Dep't of Educ., *Draft Citywide Standards of Intervention and Discipline Measures 2* (2013), available at <http://schools.nyc.gov/NR/ronlyres/C5D799FC-7A69-4DF7-B716-22CDF4A19063/0/DiscCodebooklet2013Draft.pdf> ("Establishing a school-wide tiered framework of behavioral supports and interventions guides the entire school community toward following the school's rules and expectations, as well as the delivery of consistent and appropriate consequences, e.g., PBIS (Positive Behavioral Interventions and Supports).").
- <sup>2</sup> *Discipline Code*, *supra* note 1, at 8 (providing for a range of interventions, but not a formal system of tiered intervention).
- <sup>3</sup> See *id.* at 15.
- <sup>4</sup> *Id.* A22, at 19; B21, at 25; accord N.Y. Educ. Law § 3214(3) (McKinney 2007) (stating that a "pupil who is insubordinate or disorderly or violent or disruptive" may be suspended).
- <sup>5</sup> The *Discipline Code* provides that "every reasonable effort should be made to correct student misbehavior through guidance interventions and other school-based resources and the least severe disciplinary responses." *Discipline Code*, *supra* note 1, at 4. However, other information indicates that out-of-school penalties are used with increasing frequency in New York City public schools, especially towards black students. See, e.g., New York Civil Liberties Union, *Education Interrupted: The Growing Use of Suspensions in New York City's Public Schools* 15 (Jan. 2011), available at [http://www.nyclu.org/files/publications/Suspension\\_Report\\_FINAL\\_noSpreads.pdf](http://www.nyclu.org/files/publications/Suspension_Report_FINAL_noSpreads.pdf) (showing that total student suspensions increased from 28,449 in 2001-2002 to 73,943 in 2008-2009).
- <sup>6</sup> *Discipline Code*, *supra* note 1, at 7.
- <sup>7</sup> N.Y. Comp. Codes R. & Regs. tit. 8, § 100.2(ii) (2013), available at <http://weblinks.westlaw.com/result/default.aspx?cnt=Document&db=NY%2DCRR%2DF%2DTC%3BTOCDUMMY&docname=365869921&findtype=W&fn=%5Ftop&pb=DA010192&rlt=CLID%5FFQRLT1880034516176&rp=%2FSearch%2Fdefault%2Ewl&rs=WEBL13%2E04&service=Find&spa=nycrr%2D1000&vr=2%2E0> (last visited June 17, 2013); see also New York City Dep't of Educ., *Response to Intervention (RTI) Overview for Parents & Families* (Nov. 2012), available at <http://schools.nyc.gov/NR/ronlyres/6002B557-EE35-42DA-9842-61F7E4AFCF77/0/RTIFAQParents.pdf>.
- <sup>8</sup> Los Angeles Unified Sch. Dist., *Discipline Foundation Policy: School-Wide Positive Behavior Support 2* (Mar. 27, 2007), available at [http://notebook.lausd.net/pls/ptl/docs/PAGE/CA\\_LAUSD/LAUSDNET/OFFICES/SCHOOL\\_OPS/SCHOOL\\_OPERATIONS\\_DIVISION/DISCIPLINE\\_FOUNDATION\\_POLICY/DISCIPLINE\\_FOUNDATION\\_POLICY\\_BULLETINS/DISCIPLINE%20FOUNDATION%20POLICY.PDF](http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/SCHOOL_OPS/SCHOOL_OPERATIONS_DIVISION/DISCIPLINE_FOUNDATION_POLICY/DISCIPLINE_FOUNDATION_POLICY_BULLETINS/DISCIPLINE%20FOUNDATION%20POLICY.PDF) [hereinafter *Discipline Foundation Policy*] ("This policy mandates the development of a school-wide positive behavior support and discipline plan . . . including positively stated rules which are taught, enforced, advocated and modeled at every campus.").
- <sup>9</sup> Los Angeles Unified Sch. Dist., *Consequences/School Response Reference Guide* (Mar. 27, 2007), available at [http://notebook.lausd.net/pls/ptl/docs/PAGE/CA\\_LAUSD/LAUSDNET/OFFICES/SCHOOL\\_OPS/SCHOOL\\_OPERATIONS\\_DIVISION/DISCIPLINE\\_FOUNDATION\\_POLICY/DISCIPLINE\\_FOUNDATION\\_POLICY\\_BULLETINS/ATTACHMENT%20I\\_3.PDF](http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/SCHOOL_OPS/SCHOOL_OPERATIONS_DIVISION/DISCIPLINE_FOUNDATION_POLICY/DISCIPLINE_FOUNDATION_POLICY_BULLETINS/ATTACHMENT%20I_3.PDF); see also Los Angeles Unified Sch. Dist., *Three-Tiered Approach* (Mar. 27, 2007), available at [http://notebook.lausd.net/pls/ptl/docs/PAGE/CA\\_LAUSD/LAUSDNET/OFFICES/SCHOOL\\_OPS/SCHOOL\\_OPERATIONS\\_DIVISION/DISCIPLINE\\_FOUNDATION\\_POLICY/DISCIPLINE\\_FOUNDATION\\_POLICY\\_BULLETINS/ATTACHMENT%20H\\_2.PDF](http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/SCHOOL_OPS/SCHOOL_OPERATIONS_DIVISION/DISCIPLINE_FOUNDATION_POLICY/DISCIPLINE_FOUNDATION_POLICY_BULLETINS/ATTACHMENT%20H_2.PDF).
- <sup>10</sup> Cal. Ed. Code § 48916(a) (Deering 2013) (providing for the procedure by which "a pupil shall be reviewed for readmission to a school maintained by the district or to the school the pupil last attended.").
- <sup>11</sup> Teresa Watanabe, *L.A. Unified Bans Suspension for 'Willful Defiance'*, Los Angeles Times (May 14, 2013), <http://articles.latimes.com/2013/may/14/local/la-me-lausd-suspension-20130515>. But see Cal. Ed. Code. § 48900(k) (Deering 2013) (permitting the suspension of a pupil who has "willfully defied the valid authority" of school staff).
- <sup>12</sup> District policy and state law suggest that in-school solutions should be used before out-of-school penalties. See *Discipline Foundation Policy*, *supra* note 8, at 1 ("Before consequences are given, students must first be supported in learning the skills necessary to enhance a positive school climate and avoid negative behavior"); accord Cal. Ed. Code § 48900.5(a) (Deering 2013) (stating that suspensions "shall only be imposed when other means of correction fail to bring about proper conduct."). In addition, other information suggests a disproportionate impact on black students. See, e.g., Community Asset Development Re-defining Education et al., *Redefining Dignity in Our Schools: A Shadow Report on School-Wide Positive Behavior Support Implementation in South Los Angeles, 2007-2010* 6-7 (June 2010), available at [http://www.cadre-la.org/core/wp-content/uploads/2011/03/4488\\_RedefDignityFullLengthReport\\_FINAL.pdf](http://www.cadre-la.org/core/wp-content/uploads/2011/03/4488_RedefDignityFullLengthReport_FINAL.pdf). Nevertheless, the information also indicates an overall decrease in use of out-of-school penalties. *Id.* at 7-8.
- <sup>13</sup> There is no reference in policy to restorative justice. See generally *Discipline Foundation Policy*. But see Los Angeles Unified Sch. Dist., *School Board Supports Reforming Student Discipline Policies* (June 29, 2012), [http://home.lausd.net/apps/news/show\\_news.jsp?REC\\_ID=258981&id=3](http://home.lausd.net/apps/news/show_news.jsp?REC_ID=258981&id=3) (concerning an approved Board resolution supporting policies to establish restorative justice and other intervention programs). Nevertheless, it does not appear that the Board has acted since to establish a formal restorative justice program. See generally Los Angeles Unified Sch. Dist., *Parent Student Handbook 2012-2013* (2012), available at [http://home.lausd.net/pdf/Families\\_Forms/Parent\\_Student\\_Handbook\\_2012-13\\_English.pdf](http://home.lausd.net/pdf/Families_Forms/Parent_Student_Handbook_2012-13_English.pdf).
- <sup>14</sup> *Response to Instruction and Intervention*, Los Angeles Unified Sch. Dist., <http://rti.lausd.net> (last visited June 17, 2013).
- <sup>15</sup> PBIS is in place at certain schools in the district. See *Positive Behavior Support*, Miami-Dade Public Schools, <http://pbs.dadeschools.net/default.asp> (last visited June 17, 2013); see also *What is M-DCPS SWPBS?*, Miami-Dade Public Schools (June 19 2008), <http://ese.dadeschools.net/PBS/what%20is%20pbs.htm>.

- <sup>16</sup> Miami-Dade Public Schools, *Code of Student Conduct—Secondary, 2012-2013* 49 (2012), available at [http://ehandbooks.dadeschools.net/policies/90/csc\\_sec.pdf](http://ehandbooks.dadeschools.net/policies/90/csc_sec.pdf) [hereinafter *Secondary*]; Miami-Dade Public Schools, *Code of Student Conduct—Elementary, 2012-2013* 43 (2012), available at [http://ehandbooks.dadeschools.net/policies/90/csc\\_elem.pdf](http://ehandbooks.dadeschools.net/policies/90/csc_elem.pdf) [hereinafter *Elementary*].
- <sup>17</sup> *Secondary*, *supra* note 16, at 13, 43, 45; *Elementary*, *supra* note 16, at 13, 37, 39; accord Fla. Stat. Ann. §§ 1003.32(4), 1006.07 (LexisNexis 2013).
- <sup>18</sup> See *Secondary*, *supra* note 16, at 3; *Elementary*, *supra* note 16, at 3.
- <sup>19</sup> There is no reference in policy to restorative justice. See generally *Secondary*, *supra* note 16; *Elementary*, *supra* note 16.
- <sup>20</sup> See *Secondary*, *supra* note 16, at 3; *Elementary*, *supra* note 16, at 3.
- <sup>21</sup> Note: Awaiting updated information from CCSD.
- <sup>22</sup> There is no reference in policy to a formal system of tiered intervention. See generally Clark County School District, *Behavior Guidelines for Secondary Students* (Sept. 2011) [hereinafter *Behavior Guidelines*].
- <sup>23</sup> CCSD Regulations provide that a student under permanent expulsion may not enroll in any regular school campus. CCSD Regulation 5114.2(III)(D)(4)(a), at 3 (Nov. 17, 2009), available at [http://www.ccsd.net/district/policies-regulations/pdf/5114.2\\_R.pdf](http://www.ccsd.net/district/policies-regulations/pdf/5114.2_R.pdf) (“Permanent expulsion means permanent removal of a student from a regular school campus and contemplates no trial enrollment except for alternative school placement”). CCSD Regulations provide that a student who is under limited expulsion may, under certain conditions, “return to a regular school campus, which may or may not be the campus from which the student was expelled, on a trial enrollment . . . .” *Id.* 5114.2(III)(D)(4)(b), at 3. However, this regulation on limited expulsion conflicts with a CCSD Policy which provides that a student under limited expulsion may return to a regular school campus, “other than the campus from which the student was expelled . . . .” CCSD Policy 5114(I)(D)(2) (Dec. 8, 2005), available at [http://www.ccsd.net/district/policies-regulations/pdf/5114\\_P.pdf](http://www.ccsd.net/district/policies-regulations/pdf/5114_P.pdf). This Policy was last revised on December 8, 2005, several years before CCSD Regulation 5114.2 was revised.
- <sup>24</sup> *Behavior Guidelines*, *supra* note 22, at 11; cf. NRS 392.467(1) (allowing a school board, with certain proscriptions, to “authorize the suspension or expulsion of any pupil from any public school within the school district”). State law thus allows a school board to authorize suspension or expulsion or other discipline issues, as evidenced by the original law from which this provision of NRS is derived. See Act of Mar. 2, 1956, ch. 32, §362(1), 1956 Nev. Stat. 59, 161 (allowing a school board, with certain proscriptions, to “suspend or expel from any public school within the school district, with the advice of the teachers and deputy superintendent of public instruction of the proper educational supervision district, any pupil who will not submit to reasonable and ordinary rules of order and discipline therein”).
- <sup>25</sup> See generally *Behavior Guidelines*, *supra* note 22. Discipline policies provide for suspension and other out-of-school penalties for a wide variety of student offenses. *Id.* at 10-11. In addition, the Reschly Report shows the disproportionate impact of use of out-of-school penalties on black students. Daniel J. Reschly et al., *Analysis of Clark County School District (CCSD) 2009-2010 and 2010-2011 Discipline Outcomes by Gender, Race/Ethnicity, and Disability* 3-5 (July 30, 2012).
- <sup>26</sup> There is no reference in policy to restorative justice. See generally *Behavior Guidelines*, *supra* note 22.
- <sup>27</sup> Clark County Sch. Dist., *Response to Instruction*, <http://ccsd.net/parents/response-instruction/> (last visited June 17, 2013).
- <sup>28</sup> PBIS is in place “at approximately half of the district’s 150 schools.” *Welcome to Positive Behavior Interventions & Supports*, Denver Public Schools, <http://sts.dpsk12.org/education/dept/dept.php?sectionid=82> (last visited June 17, 2013); see also Goebel, K. et al., *Positive Behavioral Intervention & Support (PBIS) Coaching Report 2005-2011: Denver Public Schools* 3 (May 2011), available at <http://denver.co.schoolwebpages.com/education/page/download.php?fileinfo=UEJJU19Db2FjaGluZ19SZXBvcnQxXy1fRFBTlnBkZjo6Oi93d3c3L3NjaG9vbHMvY28vZGVudmVYL2ltYWdlcy9kb2NtZ3IvMTY1ZmlsZTM4MjYucGRm&sectiondetailid=1> (indicating that in 2010-2011, 98 schools were implementing PBIS).
- <sup>29</sup> Denver Public Schools, *Student Conduct and Discipline Procedures* § 3-2 (Sept. 15, 2011), [http://ed.dpsk12.org:8080/parent\\_handbook/FMPro?-db=policy.fp3&-format=phdetail.html&-lay=html&-sortfield=Title&studentparent=1&PolicyID=E\\_JK-R&-find](http://ed.dpsk12.org:8080/parent_handbook/FMPro?-db=policy.fp3&-format=phdetail.html&-lay=html&-sortfield=Title&studentparent=1&PolicyID=E_JK-R&-find) [hereinafter *Student Conduct*] (providing for the “Discipline Ladder” of “[s]ix levels of intervention” based on the severity of misbehavior).
- <sup>30</sup> Students who engage in “willful and substantial disobedience or open and persistent defiance” may be removed from the classroom, but not necessarily from school. *Id.* § 4-1(A). Generally, students engaging in “severe defiance of authority/disobedience” may face penalties as provided in level D of the Discipline Ladder. *Id.* § 3-1 (“Type Two Offenses”). Level D provides for in-school suspension, not out-of-school suspension. *Id.* § 3-2. However, committing similar violations of “severe defiance” may lead to penalties as provided in level E of the Discipline Ladder, *id.* § 3-1, which provides for out-of-school suspension, *id.* § 3-2. Accord Colo. Rev. Stat. § 22-33-106(1)(a) (“Continued willful disobedience or open and persistent defiance of proper authority” may lead to suspension or expulsion).
- <sup>31</sup> PowerPoint Presentation to the School Board, Denver Public Schools, *Discipline Update: Presentation to the Board 5/13/2013* slides 2-3 (May 13, 2013); accord *Student Conduct* § 2-1 (“Schools should minimize the use of out-of-school suspensions, recommendations for expulsion, and referrals to law enforcement, to the extent practicable while remaining consistent with state statute, local ordinances, and mandatory reporting laws.”).
- <sup>32</sup> *Student Conduct* provides for restorative interventions for student misbehavior. *Student Conduct* § 2-4(B)(2). Accord Julie Poppen, *Role of Police Redefined in Denver Schools*, EdNews Colorado (Feb. 19, 2013), <http://www.ednewscolorado.org/news/role-of-police-redefined-in-denver-schools> (describing the role of police in restorative intervention methods in Denver Public Schools).
- <sup>33</sup> Denver Public Schools, *Response to Instruction*, <http://denver.co.schoolwebpages.com/education/components/scrapbook/default.php?sectiondetailid=1506> (last visited June 17, 2013).



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- <sup>34</sup> Some schools have PBIS in place. See Baltimore City Public Schools, *Code of Conduct 2012-2013* 12, 26 (2012), available at <http://www.baltimorecityschools.org/cms/lib/MD01001351/Centricity/domain/87/pdf/20120709-Code-English-FINAL.pdf> [hereinafter *Baltimore Code*] (“Some City Schools have been implementing the framework since 2005.”).
- <sup>35</sup> *Id.* at 17 (providing for four levels of “interventions and disciplinary responses.”).
- <sup>36</sup> Md. Code Ann., Educ. § 7-305(e)(4)(i) (West 2013) (“If a student has been suspended or expelled, the principal or a designee of the principal may not return the student to the classroom without conferring with the teacher who referred the student to the principal, if the student was referred by a teacher, other teachers as appropriate, other appropriate school personnel, the student, and the student’s parent or guardian.”).
- <sup>37</sup> *Baltimore Code*, *supra* note 34, at 19 (providing that “Defiance of Authority and/or Insubordination” may lead to a “1- to 2-day suspension maximum.”).
- <sup>38</sup> *Id.* at 4 (“To make sure that schools are safe for students, City Schools believes that . . . [w]hen students engage in inappropriate or disruptive behavior, principals and school staff should use a variety of interventions to teach students appropriate behavior and correct any harm that resulted from the behavior.”).
- <sup>39</sup> *Id.* at 13.
- <sup>40</sup> See *Positive Behavior Intervention & Support*, San Juan Unified Sch. Dist., <http://www.sanjuan.edu/departments.cfm?subpage=86239> (last visited June 18, 2013).
- <sup>41</sup> See *id.*
- <sup>42</sup> Cal. Ed. Code § 48916(a) (Deering 2013) (providing for the procedure by which “a pupil shall be reviewed for readmission to a school maintained by the district or to the school the pupil last attended.”).
- <sup>43</sup> San Juan Unified Sch. Dist., *2012-2013 Parent Handbook* 44 (2012), available at [http://www.sanjuan.edu/files/filesystem/english\\_handbook\\_2012-2013\\_final%20to%20printerpdf.pdf](http://www.sanjuan.edu/files/filesystem/english_handbook_2012-2013_final%20to%20printerpdf.pdf) [hereinafter *Handbook*]; accord Cal. Ed. Code § 48900(k) (Deering 2013) (permitting the suspension of a pupil who has “willfully defied the valid authority” of school staff).
- <sup>44</sup> *Handbook*, *supra* note 43, at 36-37; accord Cal. Ed. Code § 48900.5(a) (Deering 2013) (stating that suspensions “shall only be imposed when other means of correction fail to bring about proper conduct.”).
- <sup>45</sup> There is no reference in policy to restorative justice. See generally *Handbook*, *supra* note 43. However, one school implemented a restorative justice program during the 2012-2013 school year and made a presentation to the school board in April 2013. New San Juan H.S., *Restorative Justice Academy* (April 23, 2013), available at <http://www.sanjuan.edu/files/filesystem/restorejustice.pdf>.
- <sup>46</sup> Oakland Unified School District does not use the term “positive behavioral interventions and supports,” but has a “Behavioral Response to Intervention” system. See *Response to Intervention*, Oakland Unified Sch. Dist., <http://www.ousd.k12.ca.us/site/Default.aspx?PageID=1036> (last visited June 18, 2013).
- <sup>47</sup> See *id.*
- <sup>48</sup> Cal. Ed. Code § 48916(a) (Deering 2013) (providing for the procedure by which “a pupil shall be reviewed for readmission to a school maintained by the district or to the school the pupil last attended.”).
- <sup>49</sup> Oakland Unified Sch. Dist., *Parent Guide 2012-2013* 34-35 (2012), available at [http://www.ousd.k12.ca.us/cms/lib07/CA01001176/Centricity/Domain/23/parentguide2012-13\\_ENG\\_final-lores-1.pdf](http://www.ousd.k12.ca.us/cms/lib07/CA01001176/Centricity/Domain/23/parentguide2012-13_ENG_final-lores-1.pdf) [hereinafter *Guide*] (“Students who disrupt school activities or otherwise defy the valid authority of supervisors, teachers, administrators, school officials, or other school personnel engaged in the performance of their duties will be subject to disciplinary action. Whenever possible, alternatives to suspension will be used with students who defy adults or disrupt school activities. If these alternatives fail to correct the behavior, students may be suspended depending on the severity of the behavior.”).
- <sup>50</sup> *Id.* at 34 (“For other actions [for which the law does not require immediate suspension or expulsion], OUSD supports alternatives to suspension and expulsion. Such solutions can address possible causes of the behavior, including misdirected goals and unmet needs on the part of the student.”).
- <sup>51</sup> *Restorative Justice*, Oakland Unified Sch. Dist., <http://www.ousd.k12.ca.us/restorativejustice> (last visited June 18, 2013); accord *Guide*, *supra* note 49, at 33 (“Restorative Justice is a set of principles and practices employed in Oakland Unified Schools to respond to student misconduct, with the goals of repairing harm and restoring relationships between those impacted.”).
- <sup>52</sup> *Response to Intervention*, *supra* note 46.

CLARK COUNTY SCHOOL DISTRICT  
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Table 2: Summary of the Literature on Behavior Interventions  
Results from Meta-Analyses and Other Articles Appearing in Scholarly-Refereed Journals (2001-2012)  
June 27, 2013

Table 2: Showing the effects of different interventions

	Tiered Intervention/PBIS Generally	PBIS: Tier 1	PBIS: Tier 2	PBIS: Tier 3	Multicomponent Intervention <sup>1</sup>	Restorative Justice
Positive Benefit on Behavior	Yes	Yes	Yes	Yes	N/A	See note 2 below <sup>2</sup>
Positive Benefit on Academics	Yes <sup>3</sup>	N/A	N/A	N/A	N/A	N/A
No Conclusive Effects or Mixed Effects	N/A	N/A	N/A	N/A	Yes	N/A
Reference	Chaparro et al. (2012) Sadler & Sugai (2009) Stewart et al. (2007) Wilson & Lipsey (2007)	Stewart et al. (2007)	Stewart et al. (2007)	Goh & Bambara (2010) Stewart et al. (2007)	Wilson & Lipsey (2007)	Karp & Breslin (2001) Stinchcomb et al. (2006)

References: Meta-Analyses

Goh, A.E., & Bambara, L.M. (2010). Individualized Positive Behavior Support in School Settings: A Meta-Analysis. *Remedial and Special Education*, 33(5), 271-286.

doi:10.1177/0741932510383990

Stewart, R.M., Benner, G.J., Martella, R.C., & Marchand-Martella, N.E. (2007). Three-Tier Models of Reading and Behavior: A Research Review. *Journal of Positive Behavior Interventions*, 9(4), 239-253. doi:10.1177/10983007070090040601

Wilson, S.J., & Lipsey, M.W. (2007). School-Based Interventions for Aggressive and Disruptive Behavior: Update of a Meta-Analysis. *American Journal of Preventive Medicine*, 33(2 Supp.), S130-S143. doi:10.1016/j.amepre.2007.04.011

Other References

Chaparro, E.A., Smolkowski, K., Baker, S.K., Hanson, N., & Ryan-Jackson, K. (2012). A Model for System-Wide Collaboration to Support Integrated Social Behavior and Literacy Evidence-Based Practices. *Psychology in the Schools*, 49(5), 465-482. doi:10.1002/pits.21607

Karp, D.R., & Breslin, B. (2001). Restorative Justice in School Communities. *Youth & Society*, 33(2), 249-272. doi:10.1177/0044118X01033002006

- Sadler, C., & Sugai, G. (2009). Effective Behavior and Instructional Support: A District Model for Early Identification and Prevention of Reading and Behavior Problems. *Journal of Positive Behavior Interventions*, 11(1), 35-46. doi:10.1177/1098300708322444
- Stinchcomb, J.B., Bazemore, G., & Riestenberg, N. (2006). Beyond Zero Tolerance: Restoring Justice in Secondary Schools. *Youth Violence and Juvenile Justice*, 4(2), 123-147. doi:10.1177/1541204006286287

Additional Reading

- Eckes, S.E., & Burke, S.B. (2012). Are Positive Behavioral Interventions Effective at Reducing Misbehavior in Students with Behavioral Disorders? In Russo, C.J., & Osborne, A.G. (Eds.), *School Discipline and Safety* (pp. 231-245). doi:10.4135/9781452218656

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<sup>1</sup> In defining this phrase, Wilson and Lipsey (2007) state that “[t]hese programs involve multiple distinct intervention elements (e.g., a social skills program for students and parenting skills training) and/or a mix of different intervention formats . . . . Universal comprehensive programs included multiple treatment modalities, but intervention components were delivered universally to all children in a school or classroom” (p. S136).

<sup>2</sup> The two articles cited (Karp & Breslin, 2001; Stinchcomb et al., 2006) concluded that restorative justice has a positive benefit on student discipline in case studies of three schools in South St. Paul, Minnesota. Stinchcomb et al. (2006) show that out-of-school suspensions at the three schools (Lincoln Center Elementary, Kaposia Elementary, and South St. Paul Junior High) decreased from 1998 to 2001 (pp. 136-37). However, in the literature search, no meta-analyses were found of restorative justice practices in schools; the current literature on restorative justice practices in the school setting currently appears to be sparse.

<sup>3</sup> Stewart et al. (2007) cite other studies (Bower, 1995; Nelson, Benner, & Gonzalez, 2003) as they write that “reducing problem behavior makes reading instruction and developing reading skills more likely” (p. 249) and conclude that “reading and behavior experts need to combine their expertise to form an integrated three-tier model to reach students who have significant difficulties in both areas” (p. 250). Work by Chaparro et al. (2012) and Sadler and Sugai (2009) in Oregon have demonstrated positive benefits of combined behavioral and academic interventions in elementary school students in Oregon.

**CLARK COUNTY SCHOOL DISTRICT  
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**Table 3: Summary of Academic Literature on Predictors of Suspension and Expulsion**  
**Table 4: Summary of Academic Literature on Youth Delinquency**  
**Table 5: Summary of Academic Literature on Early Interventions**  
**July 25, 2013**

Table 3: Showing predictors of suspension and expulsion

	Academic	Behavioral	Demographic
Student-level	<ul style="list-style-type: none"> <li>Academic difficulties<sup>1</sup></li> <li>Alienation/disengagement from school</li> <li>Irregular attendance (e.g., tardiness, absence, absences as a result of prior exclusion)</li> </ul>	<ul style="list-style-type: none"> <li>Severity of last infraction</li> <li>Increasing severity of infractions</li> <li>Past exclusion</li> <li>Negative social skills/lower social adjustment<sup>2</sup></li> <li>Alienation/disengagement from school</li> <li>Delinquent behavior</li> <li>Distrust in or poor relationships with school adults</li> </ul>	<ul style="list-style-type: none"> <li>Age</li> <li>Race</li> <li>Sex</li> <li>Learning disability</li> <li>Emotional/behavioral disorder (e.g., ADHD)</li> <li>Socioeconomic status/poverty</li> <li>Less stable family structure</li> <li>Higher student and family transiency/mobility</li> <li>Lower parent involvement or expectations</li> </ul>
School-level	<ul style="list-style-type: none"> <li>Teachers providing less instruction and reduced demands<sup>3</sup></li> <li>Focus on excluded students as "disciplinary problems" rather than as "learners"<sup>4</sup></li> <li>Teachers believe students are "incapable of solving problems"<sup>5</sup></li> <li>Academic bias present at the school<sup>6</sup></li> </ul>	<ul style="list-style-type: none"> <li>Disciplinary matters are "handled largely by administrative rules"<sup>7</sup></li> <li>The school is "not able to provide consistent and fair governance"<sup>8</sup></li> </ul>	<ul style="list-style-type: none"> <li>Racial bias (i.e., disproportionality) present at the school<sup>9</sup></li> </ul>
References	Atkins et al. (2002), Brown (2007), Chin et al. (2012), McCall (2003), Scott et al. (2001), Wu et al. (1982)	Atkins et al. (2002), Bowman-Perrott et al. (2013), Brown (2007), Chin et al. (2012), McCall (2003), Scott et al. (2001), Theriot et al. (2010), Wu et al. (1982)	Bowman-Perrott et al. (2013), Theriot et al. (2010), Skiba et al. (2002), Wu et al. (1982)

Table 4: Predictors of delinquency<sup>i</sup>

	Academic	Behavioral	Demographic
	<ul style="list-style-type: none"> <li>Academic difficulties<sup>10</sup></li> </ul>	<ul style="list-style-type: none"> <li>Poor child behavior/conduct</li> <li>Early history of early and/or severe antisocial behavior<sup>11</sup></li> </ul>	<ul style="list-style-type: none"> <li>Parent has been arrested</li> <li>Child has been in child protective services</li> <li>Family transition (e.g., death, divorce, trauma, family upheaval)</li> <li>Child has received special education services</li> <li>Poor family management and discipline</li> <li>Parent criminality</li> <li>Learning and attention issues</li> </ul>
References	Loeber & Dishion (1983), Maguin & Loeber (1996), Walker & Sprague (1999)	Loeber & Dishion (1983), Walker & Sprague (1999)	Loeber & Dishion (1983), Walker & Sprague (1999)

<sup>i</sup> The articles regarding youth delinquency do not directly correlate delinquency with exclusion. However, it can be inferred that behaviors associated with delinquency may lead to exclusion from school, as noted by the articles regarding suspension and expulsion. In addition, the predictors associated with delinquency are similar to predictors associated with exclusion. Therefore, the predictors associated with delinquency should be considered.

Table 5: Early intervention strategies

	Academic	Behavioral
Student-level	<ul style="list-style-type: none"> <li>• High teacher expectations</li> <li>• Great teacher and administrator responsiveness to students (e.g., open communication, warmth, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• “Shepherding” (i.e., building personal relationship with student)</li> <li>• Parent involvement<sup>12</sup></li> <li>• Positive reinforcement (i.e., rewarding good behavior)</li> <li>• Logical consequences<sup>13</sup></li> <li>• Targeted interventions in moral reasoning, anger-management, and self-control</li> </ul>
School-level	<ul style="list-style-type: none"> <li>• Early educational intervention during early childhood<sup>14</sup></li> <li>• On-Campus Intervention Program (alternative placement in school with teacher and counselor)<sup>15</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Social-cognitive problem-solving/ecological interventions<sup>16</sup> (e.g., Making the Smart Choice, an alternative to suspension for violent behavior)<sup>17</sup></li> <li>• Think First (anger-management and self-control program)<sup>18</sup></li> </ul>
District-level	<ul style="list-style-type: none"> <li>• PBIS</li> <li>• RTI</li> <li>• Title I Child-Parent Center and Expansion Program (e.g., in Chicago)<sup>19</sup></li> </ul>	<ul style="list-style-type: none"> <li>• PBIS</li> <li>• RTI</li> <li>• Title I Child-Parent Center and Expansion Program (e.g., in Chicago)</li> </ul>
References	Campbell & Ramey (1994), Gregory et al. (2011), Luiselli et al. (2005), Massey et al. (2007), Reynolds & Temple (1998)	Balfanz et al. (2007), Breulin et al. (2002), Breulin et al. (2006), Bry & George (1980), Edwards (2008), Fenning et al. (2012), Luiselli et al. (2005), Reynolds & Temple (1998), Skiba & Peterson (2000), Walker et al. (1996)

## References

- Atkins, M. S., McKay, M. M., Frazier, S. L., Jakobsons, L. J., Arvanitis, P., Cunningham, T., Brown, C., & Lambrecht, L. (2002). Suspensions and detentions in an urban, low-income school: Punishment or reward?. *Journal of Abnormal Child Psychology*, 30(4), 361-371. doi:10.1023/A:1015765924135
- Balfanz, R., Herzog, L., & Mac Iver, D. J. (2007). Preventing student disengagement and keeping students on the graduation path in urban middle-grades schools: Early identification and effective interventions. *Educational Psychologist*, 42(4), 223-235. doi:10.1080/00461520701621079
- Bowman-Perrott, L., Benz, M. R., Hsu, H. Y., Kwok, O., Eisterhold, L. A., & Zhang, D. (2013). Patterns and predictors of disciplinary exclusion over time: An analysis of the SEELS national data set. *Journal of Emotional and Behavioral Disorders*, 21(2), 83-96. doi:10.1177/1063426611407501
- Breunlin, D. C., Cimmarusti, R. A., Bryant-Edwards, T. L., & Hetherington, J. S. (2002). Conflict resolution training as an alternative to suspension for violent behavior. *The Journal of Educational Research*, 95(6), 349-357. doi:10.1080/00220670209596609
- Breunlin, D. C., Cimmarusti, R. A., Hetherington, J. S., & Kinsman, J. (2006). Making the smart choice: A systemic response to school-based violence. *Journal of Family Therapy*, 28(3), 246-266. doi:10.1111/j.1467-6427.2006.00350.x
- Brown, T. M. (2007). Lost and turned out: Academic, social, and emotional experiences of students excluded from school. *Urban Education*, 42(5), 432-455. doi:10.1177/0042085907304947
- Bry, B. H., & George, F. E. (1980). The preventive effects of early intervention on the attendance and grades of urban adolescents. *Professional Psychology*, 11(2), 252-260. doi:10.1037/0735-7028.11.2.252
- Campbell, F. A., & Ramey, C. T. (1994). Effects of early intervention on intellectual and academic achievement: A follow-up study of children from low-income families. *Child Development*, 65(2), 684-698. Retrieved from <http://www.jstor.org/stable/1131410>
- Chin, J. K., Dowdy, E., Jimerson, S. R., & Rime, W. J. (2012). Alternatives to suspensions: Rationale and recommendations. *Journal of School Violence*, 11(2), 156-173. doi:10.1080/15388220.2012.652912
- Edwards, C. H. (2008). Logical consequences: Rudolf Dreikurs. In *Classroom discipline and management* (5th ed., pp. 95-123). Hoboken, NJ: Wiley
- Fenning, P. A., Pulaski, S., Gomez, M., Morello, M., Maciel, L., Maroney, E., Schmidt, A., Dahlgv, K., McArdle, L., Morello, T., Wilson, R., Horwitz, A., & Maltese, R. (2012). Call to action: A critical need for designing alternatives to suspension and expulsion. *Journal of School Violence*, 11(2), 105-117. doi:10.1080/15388220.2011.646643
- Gregory, A., Cornell, D., & Fan, X. (2011). The relationship of school structure and support to suspension rates for black and white high school students. *American Educational Research Journal*, 48(4), 904-934. doi:10.3102/0002831211398531
- Loeber, R., & Dishion, T. (1983). Early predictors of male delinquency: A review. *Psychological Bulletin*, 94(1), 68-99. doi:10.1037/0033-2909.94.1.68
- Luiselli, J. K., Putnam, R. F., Handler, M. W., & Feinberg, A. B. (2005). Whole-school positive behaviour support: Effects on student discipline problems and academic performance. *Educational Psychology*, 25(2-3), 183-198. doi:10.1080/0144341042000301265
- Maguin, E., & Loeber, R. (1996). Academic performance and delinquency. *Crime and Justice*, 20, 145-264. Retrieved from <http://www.jstor.org/stable/1147645>
- Massey, O. T., Boroughs, M., & Armstrong, K. H. (2007). School violence interventions in the safe schools/healthy students initiative. *Journal of School Violence*, 6(2), 57-74. doi:10.1300/J202v06n02\_04
- McCall, H. J. (2003). When successful alternative students "disengage" from regular school. *Reclaiming Children and Youth*, 12(2), 113-117.
- Reynolds, A. J., & Temple, J. A. (1998). Extended early childhood intervention and school achievement: Age thirteen findings from the Chicago Longitudinal Study. *Child Development*, 69(1), 231-246. Retrieved from <http://www.jstor.org/stable/1132082>
- Theriot, M. T., Craun, S. W., & Dupper, D. R. (2009). Multilevel evaluation of factors predicting school exclusion among middle and high school students. *Children and Youth Services Review*, 32(1), 13-19. doi:10.1016/j.childyouth.2009.06.009
- Scott, T. M., Nelson, C. M., & Liaupsin, C. J. (2001). Effective instruction: The forgotten component in preventing school violence. *Education and Treatment of Children*, 24(3), 309-322.
- Skiba, R. J., & Peterson, R. L. (2000). School discipline at a crossroads: From zero tolerance to early response. *Exceptional Children*, 66(3), 335-346.
- Skiba, R. J., Michael, R. S., Nardo, A. C., & Peterson, R. L. (2002). The color of discipline: Sources of racial and gender disproportionality in school punishment. *The Urban Review*, 34(4), 317-342. doi:10.1023/A:1021320817372
- Walker, H. M., Horner, R. H., Sugai, G., Bullis, M., Sprague, J. R., Bricker, D., & Kaufman, M. J. (1996). Integrated approaches to preventing antisocial behavior patterns among school-age children and youth. *Journal of Emotional and Behavioral Disorders*, 4(4), 194-209. Retrieved from DOI: 10.1177/106342669600400401
- Walker, H. M., & Sprague, J. R. (1999). The path to school failure, delinquency, and violence: Causal factors and some potential solutions. *Intervention in School and Clinic*, 35(2), 67-73. doi:10.1177/105345129903500201
- Wu, S., Pink, W., Crain, R., & Moles, O. (1982). Student suspension: A critical reappraisal. *The Urban Review* 14(4), 245-303. doi:10.1007/BF02171974



<sup>1</sup> In their meta-analysis of the literature regarding the link between academic performance and delinquency, Maguin and Loeber (1996) defined academic performance in terms of studies that used “subject-specific and composite measures of performance whether made by teachers, the subjects themselves, or other knowledgeable adults or derived from standardized tests (e.g., California Achievement Tests)” in addition to “grade retention or special class placement” (p. 158). James Kaufmann notes that “Low achievement and behavior problems go hand in hand” (as cited in Scott et al., 2001, p. 312). Brown (2007) notes that “many students who are suspended or expelled have not done well academically . . .” (p. 433). In addition, Brown shows that “[p]rolonged absences can wreak havoc on students’ academic progress” (p. 445). Wu et al. (1982) note “most suspended students are academically deficient” (p. 246) as they cite Neill (1976).

<sup>2</sup> In their analysis of the data from the Special Education Elementary Longitudinal Study, Bowman-Perrott et al. (2013) discuss social skills in terms of parent reporting of how well the child got along with peers and teachers (p. 87). The results were reported on a 4-point Likert scale, with 1 being “not at all well,” and 4 being “very well” (p/ 87). Social adjustment concerns “11 items measuring teacher ratings” of different student behaviors, including the following: “joins group activities without being told to,” “acts impulsively,” and “controls his or her temper in conflict situations with other students” (p. 87-88). The results were reported on a 3-point Likert scale, with 1 being “never,” 2 being “sometimes,” and 3 being “very often” (p. 88).

<sup>3</sup> Scott et al. (2001) discuss a study by Carr, Taylor, and Robinson (1991) in which “among a group of students with disabilities, teachers provided less instruction and reduced demands for students who exhibited disruptive behaviors” (p. 313). Scott et al. thus write that “students with academic or behavior difficulties experience time in the classroom not as an exciting opportunity for learning, but as an aversive situation,” and therefore, the student avoids academic tasks, becomes academically deficient, and have further negative interactions with teachers (p. 313). Along a similar line of thought, Brown (2007) writes that “[t]he perception that students with histories of academic failure and truancy simply “do not want to learn” may preclude a sense of urgency in examining the compounding effects of school exclusion on their academic achievement” (p. 433).

<sup>4</sup> Brown (2007) writes that “emphases on students excluded from school through disciplinary action as “disciplinary problems,” rather than as learners, can lead to a greater focus on punishment and behavior modification than on academic learning” (p. 433).

<sup>5</sup> Wu et al. (1982) discuss the relationship between students’ chances of being suspended and “whether the teacher perceives students as capable of solving their problems through logical reasoning” (p. 258).

<sup>6</sup> Wu et al. (1982) discuss academic bias as how teachers report the number of low-ability students at the school, i.e., if teachers think there are many “low-ability” students at the school (p. 265).

<sup>7</sup> Wu et al. (1982) refer to administrative centralization of discipline, i.e., the extent to which school rules largely govern discipline versus the extent to which individual teachers have greater “discretionary power” (p. 260).

<sup>8</sup> Wu et al. (1982) refer to the Congressionally mandated Safe School Study’s “Good Governance Scale,” which measured students’ reporting on 8 variables of school governance, including the following: “the school rules are never enforced,” “teachers at . . . school almost never keep order in class,” and “school rules are almost never fair” (p. 263).

<sup>9</sup> Wu et al. (1982) refer to “unequal treatment” between white students and nonwhite students (p. 268-70). Skiba et al. (2002) declare that the data from their study “add to a body of research going back at least 25 years in verifying” the perceptions that “students of color and those from low-income backgrounds are more likely to experience a variety of school punishments” (p. 333).

<sup>10</sup> See, e.g., note 1.

<sup>11</sup> E.g., Loeber & Dishion (1983) discuss antisocial behaviors as including “stealing,” “lying,” “wandering,” and “truancy” (p. 79).

<sup>12</sup> Parent involvement can be as simple as keeping the parent informed on the child’s progress in school. For example, in the study by Bry and George (1980), parents and teachers had the opportunity to meet and “get acquainted” with each other, and the teacher would periodically call or write to the parents, especially after positive improvements in student behaviors (p. 255).

<sup>13</sup> According to Edwards (2008), logical consequences to student actions are consequences that “have a reasonable connection to some action” and “are logically related to the misbehavior the teacher hopes to correct and are devoid of any moral judgments” (p. 114). Punishment, to the contrary, “does not have a logical connection to a particular behavior” and “is arbitrarily administered and usually designed to be painful enough so that misbehaving students have no choice but to change their behavior” (p. 114). Edwards



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provides an example: if students “talk during lectures and discussions, the teacher may punish them by subtracting points from their grades. In reality, grades have little to do with talking during instruction” (p. 114).

<sup>14</sup> Campbell and Ramey (1994) evaluate the Carolina Abecedarian Project, which was an “experimental study of early childhood educational intervention for children from poverty families” (p. 684).

<sup>15</sup> Massey et al. (2007) outline several features of this program: the student remains in school but is separated from other students, a teacher helps the student stay on track with academic work, and a counselor provides intervention services for “behavioral and emotional problems” the student may be experiencing (p. 60).

<sup>16</sup> Fenning et al. (2012) discuss these approaches in terms of practices that account for the social situations in which students find themselves and how students learn from and respond to these social situations (p. 113-14).

<sup>17</sup> Breunlin et al. (2006) describe the program as a tiered “larger systems intervention” that involves students, parents, administrators, and community members in defusing tensions at a school (p. 249).

<sup>18</sup> Massey et al. (2007) describes the program as “an anger management and conflict resolution curriculum for secondary students” and writes that this program “has been empirically tested and is considered a culturally sensitive anger management program for classroom use” (p. 60).

<sup>19</sup> Reynolds and Temple (1998) outline the features of this program: “It emphasizes three major features: the provision of comprehensive services, parental involvement in school, and a child-centered focus on reading/literacy skills” (p. 235).

## VIII. CONCLUSION

The members of SEOACII generated a set of proposed changes to policy, practice, and/or structure. Options that SEOACII submitted for consideration by the Superintendent (and ultimately the Board of School Trustees) are designed to:

- Identify methods designed to improve the quality of discipline-related data so that the data are valid, reliable, and comparable across students and schools;
- Identify the support necessary to ensure that a moratorium on suspensions and expulsions is feasible and successful in promoting safety academic performance;
- Identify a way to gauge the impact of District efforts to reduce undesired overrepresentation of African American students in expulsion and suspension;
- Identify a way to appraise the impact of professional development on staff cultural competency;
- Identify a range of viable early intervention possibilities that go beyond what the District has in place (while at the same time ensuring these are new and different and thus not in jeopardy of violating the “supplement versus supplant” clause related to the Title I clause of the federal *Elementary and Secondary Education Act*);
- Define and detail the advantages of various models of “tiered-intervention disciplinary systems” and to specify the most desirable aspects of a particular form of a “tiered-intervention disciplinary system;”;
- Identify appropriate interventions that go beyond what the District is currently providing that are intended to enhance the early literacy of K-3 students who are not yet proficient in Reading, Writing, Listening, and Speaking;
- Propose ways to minimize unwanted variation in how schools implement discipline-related policies; and
- Provide guidance with respect to quarterly reporting on implementation of SEOAC recommendations.

Close inspection of the process used to arrive at the changes to policy, practice, and/or structure that are outlined in this report will show that the SEOACII options:

- Reflect consensus;
- Were delivered on time and to specification;
- Conform to requirements of law, contract, and policy;
- Incorporate actions that are achievable within the existing resources;
- Are structured to have the effect of supporting schools in their efforts to ensure every student is “College and Career Ready”;
- Are reasonably designed to achieve the desired effect of eliminating undesirable over-representation;
- Are based on claims that are defensible, valid for their purpose, and based on reliable information.