Key Elements of Memoranda of Understanding that Formalize School-Police Partnerships:

Analysis of Four Recent Agreements in California



FIGHT CRIME: Invest in Kids California

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Introduction

Student misbehavior is a part of everyday life on school campuses and is primarily addressed by school administration through the disciplinary process. Where police officers become more involved in the daily routines of local schools, many questions arise around when student misconduct becomes the responsibility of law enforcement rather than school staff and the roles officers play on campus. Issues that emerge when these roles are unaddressed include unnecessary criminalization of students, unintended disproportionate minority contact, and privacy concerns, among others.

Increasingly, schools and police enter into written agreements, often referred to as a memorandum of understanding (MOU), to formalize their partnerships, clarify expectations, and address concerns before they develop. The decision to formalize the partnership through a written agreement between schools and police should be a collaborative, data-driven process that responds to local needs and includes input from a variety of community stakeholders, school staff, students, parents, and law enforcement.

There is no "one size fits all" when it comes to MOUs. Because the needs and cultures of school districts vary, the elements of an effective MOU will also vary. For example, a school district dealing with issues of gangs and guns[1] will have different needs than a district dealing with truant and disruptive students, which can be more easily addressed through school-based positive discipline and other intervention strategies.

This brief reviews the eight key elements of MOUs identified by the U.S. Department of Justice's Office of Juvenile Justice and Delinquency Prevention (OJJDP) and The Council of State Governments in their collaborative report, *The School Discipline Consensus Report*, published in 2014. The following analysis incorporates relevant examples from four large California school districts—Los Angeles, Oakland, Pasadena, and San Francisco—that have recently adopted MOUs or similar agreements with police.

Overview of the Four California MOUs

The four MOUs reviewed are from unified school districts (USDs) with student populations from 18,500 in the Pasadena USD to nearly 650,000 in the Los Angeles USD.[2] There are some clear differences between the partnerships in these four jurisdictions, including the type of police department and officers involved in the partnership, the overall structure of the agreement, and the process for deciding when a problem crosses from a school discipline issue into a law enforcement intervention.

Three MOUs—San Francisco, Pasadena and Oakland—are between the local school districts and the municipal police departments. The fourth MOU in Los Angeles is technically a district policy, not an MOU, because the Los Angeles USD employs its own

school district police agency, the Los Angeles School Police Department (LASPD), whose school police officers are technically "school officials." The Oakland USD also employs its own school police department governed by internal agreements; however, the MOU reviewed here is an agreement between the Oakland Unified School District and the Oakland Police Department (OPD) for service provided by OPD at six targeted schools. Also of note in Oakland, the MOU only applies to officers assigned to the School Safety Officer Program and not all OPD officers.

Some school districts address issues not covered by an MOU by adopting Administrative Regulations and Board Policies. Though outside the scope of this analysis, this brief does note some cases when a district addresses certain issues through Administrative Regulations and Board Policies, especially when these guidelines are referenced in an MOU.

Finally, there is a difference in the format of the MOUs. The three agreements in San Francisco, Oakland, and Pasadena are structured similarly. All three utilize a similar template and localize the language to the specific needs of each school district and police department. The agreement in Los Angeles is much different. Because the Los Angeles Unified School District employs its own school police department, many of the elements in an MOU have been predefined through administrative policies and a locally adopted School Climate Bill of Rights. The district policy reviewed here focuses mainly on the roles and responsibilities of school police officers on campus and the processes they are to follow when they interact with students or become involved with potential student disciplinary issues.

Types of School-Based Officers

The MOUs focus on two categories of law enforcement officers who interact with students on a school campus. They are municipal police officers and school police officers, and both often refer to themselves as School Resource Officers (SROs). Both are peace officers trained and certified by the Peace Office Standards and Training (POST) Council and are sworn officers authorized to carry a firearm and make arrests.

Municipal police officers are uniformed police officers employed by a local police department and assigned to patrol on and around a school campus or, sometimes more broadly, within the police districts in which their designated schools are located. (County sheriff departments may also employ school-based officers). In addition to being POST-certified officers, school-assigned uniformed officers can receive specialized training and experience in youth development, the educational system, conflict resolution, de-escalation techniques, alternatives to criminal justice involvement, restorative practices, and more. Although the many duties of a school-assigned officer vary by community need, there are three basic roles for an SRO: safety expert and law enforcer, problem solver and community resource liaison, and educator and mentor.[3] The MOUs in San Francisco,

Oakland, and Pasadena refer to their school-assigned officers using varying terminology. San Francisco calls their officers SROs, while Oakland uses the term School Safety Officers, and Pasadena's officers are part of the Safe Schools Team.

School police officers are employees of a school district police agency, not the local police department. This is the case in Los Angeles USD, which operates and oversees the Los Angeles School Police Department (LASPD), the largest independent school police department in the country, comprised of more than 350 sworn police officers, 126 non-sworn school safety officers, and a number of civilian support staff assigned to patrol middle and high schools. LASPD officers are assigned to school campuses and also patrol the surrounding areas. One advantage that a school police department has is flexibility around data sharing. Because the officers are technically "school officials," there are fewer barriers between school, police, health, and welfare data sharing. These barriers may exist in other partnerships where interagency cooperation can be restricted by privacy laws and limits on sharing data.

A third category of officer occasionally referenced in the MOUs is local uniformed police officers that are not assigned to a school, but may respond if needed, such as when school officers are unavailable, further investigations are required, or there is a high priority emergency like a firearm on campus or natural disaster.[4]

Law Enforcement Support for MOUs

There is broad support from law enforcement for MOUs, including from the U.S. Department of Justice's Community Oriented Policing Services (COPS) office, the National Association of School Resource Officers (NASRO), and individual police chiefs.

Chula Vista Police Chief and current California Police Chiefs Association President David Bejarano supports "school-police partnerships when the goal is to reduce the number of students being removed from school for minor disciplinary offenses, which research has confirmed is a contributing factor to later juvenile justice interactions. A well-worded MOU can reduce the friction between police and schools and help build positive relationships with the community, especially our youth."[5]

NASRO recommends the use of MOUs when formalizing partnerships between schools and police to set expectations and clarify the roles of officers of campus. Dr. Richard Caster, then Executive Director of NASRO, suggested that schools and police work closely together to develop "word for word" the expectations in an MOU. He explained that MOUs should include:

> *"Everything from what time the shift starts, who provides/pays for the cars, whether the SROs are going to football games, and overtime issues. There are a multitude of*

> *issues that you are going to stub your toe on if you don't work them out ahead of time. So if a school says, "No tasers," and police say, "It's part of the uniform," you have to have that arranged before the SRO comes in wearing a taser."*[6]

Police can benefit from entering into an MOU with their local school district in a few ways. First, by clearly outlining officer roles and responsibilities, MOUs can help preserve the use of police time and resources for truly safety-related issues, rather than asking police officers to replace school staff or counselors in conflict resolution and de-escalation with students and parents when no imminent safety threat exists. When MOUs emphasize that discipline is the responsibility of the school and not law enforcement and delineate when to call and not to call for police assistance, they can help limit police involvement to when an incident crosses a certain threshold. This also helps reduce unnecessary student involvement with the juvenile justice system as well as unintended disproportionate minority contact.

Second, MOUs can provide avenues to build positive relationships with youth and the community, while at the same time reducing conflicts between police and schools. The community stakeholder process to formulate the agreement brings together police, school staff, students, parents and community groups to work together towards a common goal. Over time, relationships can get stronger as all sides compromise to form and maintain an agreement everyone can support. Including students or a student committee in the stakeholder process and ongoing meetings and evaluations also fosters positive youth-police relationships.

Third, MOUs help aid in cross-agency collaborations by alleviating barriers to partnerships that involve law enforcement. These barriers include legal and data privacy regulations that prevent sharing of educational data, health and welfare data, and juvenile justice data between agencies. An MOU can address such restrictions by providing that student data can be shared in limited ways to assist cross-agency teams that are addressing student needs and benefiting their outcomes.

Fourth, an MOU ensures that a school-police partnership is not contingent on interpersonal relationships between police and school administrators. Relying on relationships may work in a small district or rural community where everyone knows everyone, but even there, the partnership can run astray if any of the protocols or expectations are misinterpreted or there is a change in critical personnel.[7]

Finally, completion of an MOU is necessary to qualify for federal funds for a school-police partnership. The U.S. Department of Justice's COPS office supports the use of MOUs when SROs are assigned to school campuses. To promote a successful collaboration between local law enforcement and the educational community the COPS office requires an agency

receiving federal COPS funding for SROs to submit an MOU within 90 days of the award start date in order to receive its COPS Hiring Program grant.[8]

Eight Key Elements of an MOU

In *The School Discipline Consensus Report*, the Council of State Governments and the U.S. Department of Justice's Office of Juvenile Justice and Delinquency Prevention (OJJDP) have identified eight key elements of MOUs or similar agreements formalizing school-police partnerships.[9] These elements, which MOUs generally incorporate in whole or in part, include:

1. Goals and Objectives
2. Roles and Responsibilities
3. Selection, Training, Support and Supervision of School Officers
4. Legal Issues
5. Data Collection and Reporting
6. Evaluation Procedures for the Partnership
7. Funding or Cost-Sharing
8. Terms of the Agreement and Schedule for Review and Renewal

Spotlights on 8 Key Elements from Four Recent California MOUs

MOU Key Elements	School District	Spotlight
1. Goals and Objectives	San Francisco	Primary objectives are "to ensure safety and foster positive police/youth engagement […] while also avoiding unnecessary criminalization of SFUSD students for whom arrest and juvenile court involvement creates serious potential long-term consequences."
	Los Angeles	The Los Angeles School Police Department shall seek a balance of intervention practices "consistent with the Superintendent's 2012-2015 Strategic Plan for the LAUSD that espouses campus policing practices of 'non-punitive' enforcement methods that support strategic problem-solving methods rather than citation and arrest-driven enforcement methods."
2. Roles and Responsibilities	San Francisco	"Neither the SRO nor any other SFPD police officer shall act as a school disciplinarian. Disciplining students is a school responsibility."
	Pasadena	Officers "will not respond to calls for discipline problems." (Emphasis in MOU.)
	Oakland	Includes a specific list of misbehaviors where it is not appropriate to call for law enforcement assistance. These issues include but are not limited to trespassing; loitering; profanity; insubordination/defiance; verbal abuse and/or harassment; failure to wear or correctly wear school uniform or follow policies regarding clothing; possession of a prohibited item that does not violate the penal law (i.e. cell phones); lateness, cutting class, absenteeism or truancy; and alleged or witnessed promoting or claiming of a neighborhood or crew (including verbally, through graffiti, through clothing or hand signs).
	Los Angeles	Provides a four-step process for school police officers to follow when interacting with a student. If the situation remains unresolved by Step 4, officers are to consult a matrix of graduated responses.
	San Francisco	Clearly lists which offenses are considered "low-level school-based offenses" that should be handled through a system of graduated responses instead of being referred to county probation and the juvenile justice system. The low-level offenses include battery on school property or against school staff; attempt to resist arrest; disturbing the peace; and possession of marijuana for personal use.
	Oakland	Establishes a program of Mentor Officers who work on campus and, with parent approval, are paired up with at-risk students to provide mentorship and guidance.
3. Selection, Training, Support and Supervision of School Officers	Oakland	Although "OPD is open to having OUSD participate in this process, … [t]he authority for selection, training, equipping, assignment, supervision, duties and permanent or temporary reassignment of COPS Grant Officers will remain solely with the City of Oakland's Chief of Police."
	San Francisco Oakland	SROs are encouraged to participate in trainings provided by the school districts and community based organizations in areas such as restorative

MOU Key Elements	School District	Spotlight
		justice/practices, youth development and choices, teaching methodology and practice, relevant confidentiality and special education laws, implicit bias, and other education issues to facilitate their understanding of school culture.
	San Francisco	Emphasizes student participation by adding that trainings "shall also include a significant youth-led component that focuses on building relationships with youth and understanding the perspective of youth."
4. Legal Issues	Oakland	Provides that a school official must get oral consent from a parent or guardian before interrogation of a minor, and if a parent does not want his or her child questioned without the parent or guardian, the student may not be made available to law enforcement for questioning until the parent is present.
	Oakland	Addresses privacy directly in a section titled, "Confidentiality and Information Exchange." This section acknowledges FERPA and additional state and federal codes, and advises that, "OPD … will be permitted access to student data only where permissible under state and federal law and as set forth in this MOU."
	Los Angeles	There are fewer barriers to sharing student data with Los Angeles school police officers because they are technically employed by the school district and are acting as "school officials."
5. Data Collection and Reporting	San Francisco Oakland	Encourage the usage of data analysis and sharing to address "efforts to reduce disproportionate minority contact with police and the juvenile justice system [and] reduce the rate of school-based arrests and citations while maintaining a safe school climate." Data is collected on elements such as crime incidents reported to or observed by a school officer, number of times officers are called to campus, number of arrests of students, truancy, feedback and disputes, referrals and diversions, referrals to Child Protective Services, and other information deemed important by local stakeholders. Data is to be further disaggregated by school site, offense, disposition, and student subgroup including, but not limited to, age, race, ethnicity, and gender
6. Evaluation Procedures for the Partnership	San Francisco	The SFUSD Restorative Practices Task Force shall include at least two student members and is tasked with gathering feedback and providing findings and recommendations related to compliance with the MOU. Also empowering youth, representatives from the SFUSD Student Advisory Council are given the opportunity to comment on program reports given by SFPD to the Board of Education.
7. Funding or Cost-Sharing & 8. Terms of the Agreement and Schedule for Review and Renewal	Oakland	Opening "Recitals" explain that the Oakland Police Department was awarded a grant from the U.S. Department of Justice for a COPS Hiring Program to fund 25 Oakland Police Officers in the School Safety Officer Program over a three-year period.

1. Goals and Objectives

Establishing early on in an MOU the mutually agreed upon goals and objectives will help ensure that all parties involved have the same expectations of the school-police partnership. According to the Council of State Governments and Department of Justice's *The School Discipline Consensus Report*, "Goals will vary, but should include such common themes as improving or maintaining school safety, promoting positive experiences with law enforcement, protecting students' privacy and dignity, reducing the need for police enforcement (arrests and citations) for minor offenses, connecting students to needed supports and services, and reducing disparities for students of color and vulnerable populations."[10]

All four MOUs highlighted in this brief have the stated goal of maintaining safety on and around campus and building positive youth-police relationships. Another goal common in the MOUs for San Francisco, Oakland, and Los Angeles, is to reduce the rate of school-based arrests and citations and avoid the unnecessary criminalization of students. This is stated most clearly in the San Francisco MOU, which provides that the primary objectives are "to ensure safety and foster positive police/youth engagement […] while also avoiding unnecessary criminalization of SFUSD students for whom arrest and juvenile court involvement creates serious potential long-term consequences." In the same vein, both San Francisco and Oakland aim to reduce disproportionate minority contact by analyzing the data that is being collected regarding police interactions with students.

MOUs also address specific local issues identified in the planning process. For example, Oakland's MOU identifies four specific goals for the school-police partnership: reducing or eliminating crimes involving child trafficking; addressing student truancy; providing students safe passage to and from school; and offering mentoring services to students.

In Los Angeles, the goals in the MOU are specifically focused on aligning expectations with previously existing district policies on school climate aimed at reducing punitive discipline practices. The "Purpose" of this MOU is to, "align police officer roles and responsibilities when enforcing minor law violations on campus and safe passages with the LAUSD School Climate Bill of Rights." The agreement continues that the LASPD shall seek a balance of intervention practices "consistent with the Superintendent's 2012-2015 Strategic Plan for the LAUSD that espouses campus policing practices of 'non-punitive' enforcement methods that support strategic problem-solving methods rather than citation and arrest-driven enforcement methods."

2. Roles and Responsibilities

Outlining the roles and responsibilities of school officers and, to a lesser extent, school administrators, is the operational cornerstone of MOUs. This section in the agreement delineates the criteria for when to involve law enforcement, how officers should interact with students, and whether the appropriate response to an incident is administrative or criminal. Clearly defining the roles of officers when on campus and in disciplinary situations can help limit the use of citations or arrests for low-level offenses that can otherwise be handled through the school's disciplinary process.

This section of an MOU addresses confusion or conflicting expectations about the role of a school resource officer. Surveys have found that school administrators and staff view the roles of school officers in a reactive manner, primarily as first responders. Meanwhile, school officers frequently view their roles more broadly, giving weight to responsibilities beyond strictly responding to calls and maintaining order, including proactive activities like teaching and relationship building.[11]

All four MOUs make clear the general guideline that student discipline is the role of schools, not police, unless there is a threat to the safety of students or school staff. One approach focuses on the role of officers. In Los Angeles, the MOU states that officers shall "respond to matters pertaining to school safety, not enforce school discipline or punish students," while the Pasadena MOU states that officers, "will not (emphasis in MOU) respond to calls for discipline problems." Another approach, in the San Francisco and Oakland MOUs, places the obligation on the schools by stating, "Disciplining students is a … school responsibility."

Maurice "Mo" Canady, Executive Director of The National Association of School Resource Officers (NASRO), emphasizes that SROs should not handle routine disciplinary matters. "When it comes to formal discipline, especially suspensions and expulsions, there's no place for law enforcement," Canady says. "We're very clear on that."[12]

Decision to Request Police Assistance Depends on the Offense

There are certain times, designated by California Education Code 48902, which is referenced in three of the four MOUs, when a call to law enforcement is mandatory, such as when there is a firearm or explosive on campus.[13]

Beyond these offenses, all four agreements have set general criteria for when it is required or appropriate to involve law enforcement. The MOUs in San Francisco and Oakland have an explicit section on "Requesting Police Assistance," which provides that police shall only be called if it is "necessary, required and/or appropriate (necessary to protect physical safety, required by law, and/or appropriate to address criminal behavior)." Los Angeles is a little more general. The MOU provides that LASPD officers should not respond to an incident "unless there is an immediate

nexus to student and or staff safety." Similarly broad, the Pasadena MOU states that school personnel "will evaluate the appropriateness of handling on-campus incidents administratively," and that a situation should immediately be brought to the attention of the police department if the incident "would likely require a police response or police involvement."[14] Because it is subjective which incidents may require police intervention, Pasadena PD has continuous training each year with the respective school principals so that they each have a sense of what is worthy of reporting and what is not.

Given such general criteria, without further clarification it may be unclear when police should become involved, especially when misconduct has been relatively minor.

MOUs often provide helpful clarification by identifying minor, low-level offenses for which school staff should or should not request law enforcement assistance, or school police should refer students to school officials to address as a disciplinary matter.

Explicitly defining what is meant by a "minor" or "low-level" offense and giving specific directions for handling such offenses can avoid much confusion and friction between schools and police. A variety of opinions of what minor, low-level offenses are may reflect regional and cultural influences. Some school districts may consider a marijuana violation as a disciplinary issue, while others may view it as a criminal issue. If not clearly defined, tensions arise around how school administrators define minor offenses versus what a police officer may assume is the definition. In cases where an administrator has decided that an incident is disciplinary, officers may respect those decisions based on their own enforcement discretion.

The MOU for Oakland USD includes a specific list of misbehaviors where it is not appropriate to call for law enforcement assistance. These issues include but are not limited to trespassing; loitering; profanity; insubordination/ defiance; verbal abuse and/or harassment; failure to wear or correctly wear school uniform or follow policies regarding clothing; possession of a prohibited item that does not violate the penal law (i.e. cell phones); lateness, cutting class, absenteeism or truancy; and alleged or witnessed promoting or claiming of a neighborhood or crew (including verbally, through graffiti, through clothing or hand signs). In cases such as these, the MOU states that discipline is the responsibility of the school and shall be handled by school administrators in partnership with the community and parents.

Police Interaction

When police do become involved in a school incident, particularly for minor, low-level offenses, the question becomes, "What happens next?" Confusion often stems from differences between the fundamental responsibilities of school administrators and police officers.

Though both parties share the interest of providing a safe environment for learning, school administrators are primarily charged with representing the best interests of the child (*in loco parentis*, or "in the place of parents"), while police officers are sworn to uphold and enforce the law when it gets broken, which can sometimes include student misbehavior.[15]

An MOU can outline a step-by-step process for how an officer should approach student interaction and disciplinary decision-making.[16] The Los Angeles MOU provides a four-step process for school police officers to follow when interacting with a student. The process includes a series of guiding questions for school police to consider before making an arrest, issuing a citation, or providing a referral. Steps 1-3 require officers to evaluate the situation, communicate with the student, and identify graduated responses that prioritize school-based interventions. If the situation remains unresolved, Step 4 requires officers to consult the "LASPD Administrative Referral and Diversion Matrix" for guidance on graduated responses.

Graduated Responses

MOUs often outline varying systems of graduated responses, based in part on the type of offenses and/or the number of incidents a student is involved in each school year. The MOUs in Los Angeles and San Francisco both identify specific low-level offenses that are subject to graduated responses. In Los Angeles, the "Administrative Referral and Diversion Matrix" (see Appendix A) that the LASPD consults at Step 4 (see above) is a color-coded rubric that lists different levels of offenses that result in varying degrees of consequences. The Matrix lists eight low-level violations with the related education, penal, health, or business code section and graduated responses.

In the San Francisco MOU's graduated response system (see Appendix B), each of the low-level offenses listed receives the same degree of consequences, with penalties increasing for the first, second, and third offenses. When officers become involved in a school-based incident, the MOU clearly lists which offenses are considered "low-level school-based offenses" that should be handled through a system of graduated responses instead of being referred to county probation and the juvenile justice system. The low-level offenses include battery on school property or against school staff; attempt to resist arrest; disturbing the peace; and possession of marijuana for personal use.

The graduated responses listed in the MOUs in Los Angeles and San Francisco range from minor punishments such as a warning or detention to more major consequences like citation or arrest. The Matrix in Los Angeles lists consequences that begin with a school-site "Administrative Referral" for first-time offenders or for certain low-level offenses such as tobacco possession, trespassing, or theft under $50, where students will be referred to an intervention program, school services, or suspension. Repeat offenders or higher-level offenses such as

marijuana or alcohol possession, fighting, vandalism under $400 or battery, may receive an LASPD "Diversion Referral" where they will be matched up with a community-based intervention program to be completed in order to avoid involvement in the criminal justice system. After exhausting all other options, the police may initiate a citation or arrest as a last resort. Similarly, in San Francisco, graduated responses range from an admonishment, counseling or no action taken, to a referral into a diversion program or all the way up to filing a complaint with the court.

A report from the U.S. Department of Justice's Community Oriented Policing Services observes, "MOUs are typically careful not to limit police authority or discretion. Instead, they urge officers to minimize arrests for minor offenses," and focus on available alternatives.[17] Both MOUs for San Francisco and Los Angeles are careful to maintain officer discretion throughout their systems of graduated sanctions so as not to restrict the options for intervention, citation or arrest.

Additional Roles of Officers

MOUs often describe additional roles that officers assigned to work with schools may undertake, including a variety of activities as part of a strategy to support a safe learning environment, build positive relationships between youth and police, and avoid the criminalization of students for minor misconduct (see Appendix C for expanded list of roles).

The Oakland MOU offers the most explicit example of additional roles for SROs by establishing a program of Mentor Officers who work on campus and, with parent approval, are paired up with at-risk students to provide mentorship and guidance. In the Community Outreach section, similar to language in San Francisco, the Oakland MOU encourages officers, "to collaborate with school-based community organizations, parent-teacher organizations, student government and OUSD staff to develop opportunities for positive activities, such as panel discussions, mentoring programs, community coalitions or task forces."

In addition to broad language about building positive student-police relationships, the Pasadena MOU highlights the police role in conflict resolution. The MOU clarifies that SROs "will provide conflict resolution between students and defer to school administration. The approach to dealing with criminal conduct is intended to facilitate the creation of an atmosphere that promotes safety and education."

3. Selection, Training, Support and Supervision of School Officers

The governing structure of a school-police partnership poses another series of issues, including the selection, training, supervision and support of school officers. A report from the U.S. Department of Justice's COPS office suggests that this section of an MOU "should clearly outline the role of each agency in these tasks to encourage accountability," and ensure that the right candidates are chosen for the job of school officer and that they are provided with the proper support from both the law enforcement agency and school district to build and maintain an effective partnership.[18]

Selection

Generally, the police department is responsible for selecting and assigning to schools officers who are a good fit and have the appropriate training on youth issues, although the school district may have some input. Similarly, regarding oversight, the federal COPS office advises, "With rare exceptions, [officer supervision] lies with the law enforcement executive or his or her law enforcement designee."[19]

While the San Francisco and Oakland MOUs welcome input from school administrators and the community as part of the selection and assignment process for SROs, they also make clear, along with the Pasadena MOU, that selection of officers for the school-police partnership is the sole responsibility of the police chief. The MOUs also go on to assign responsibility for pre-service and ongoing in-service training with the law enforcement agency and for supervision through the police department's chain of command.

The MOU in Oakland expresses this most clearly: Although "OPD is open to having OUSD participate in this process, … [t]he authority for selection, training, equipping, assignment, supervision, duties and permanent or temporary reassignment of COPS Grant Officers will remain solely with the City of Oakland's Chief of Police." The MOU adds that, "COPS Grant Officer[s] and other police officers are supervised by OPD, and not OUSD." Furthermore, "the COPS Grant Officer is neither a member of the security staff; a supervisor of OUSD security officers; nor a supervisor or subordinate of an OSPD officer."

Training for SROs

In addition to in-service training from their police department, officers selected to serve in a school-police partnership often have the opportunity to receive different types of training from the school district. These trainings can include topics such as youth development, positive discipline strategies, special education laws, and more. Cross-training opportunities between officers and school staff are often available as well.

The MOUs in San Francisco and Oakland encourage officers to participate in trainings provided by the school districts and community based organizations in

areas such as restorative justice/practices, youth development and choices, teaching methodology and practice, relevant confidentiality and special education laws, implicit bias, and other education issues to facilitate their understanding of school culture. The San Francisco MOU emphasizes student participation by adding that trainings "shall also include a significant youth-led component that focuses on building relationships with youth and understanding the perspective of youth."

Training by SROs

Officers also may provide many different kinds of trainings to school staff and students, including school safety, crisis response, gang prevention, drug awareness, crime trends and more.

San Francisco's MOU encourages officers to provide professional development to school staff in areas of gang awareness and prevention, crisis response, and personal safety. Additional trainings listed in the MOU that officers could provide for students, parents, and staff include crime trends and current laws, juvenile statutes, and law enforcement procedures relevant to schools.

In Pasadena, the MOU outlines two types of trainings that the Safe Schools Team will coordinate. The first training is mandated for PUSD security personnel during the regular school year. The second training is designed to help PUSD administration and staff understand the processes related to investigations and arrests that may occur on school grounds.

MOU Distribution and Training

MOUs often provide guidance for the distribution of and training on the agreement itself to raise the awareness of the MOU among both the school and law enforcement communities and keep them informed of the roles and expectations for all parties involved, the guidelines for when to call law enforcement, and what the potential consequences of that response may be for any student involved.

The MOUs in both San Francisco and Oakland contain a section on training and distribution of the MOU. With nearly identical text, both MOUs call for the local police department to "ensure that this MOU is distributed to all of its police officers […] and that appropriate […] training regarding the provisions of this MOU and their responsibilities under the MOU is provided [to officers]." Both MOUs call on the school districts to "ensure that this MOU is distributed to all of its […] school sites and that appropriate training regarding the provisions of this MOU and staff responsibilities under the MOU is provided [to school staff]."

4. Legal Issues

MOUs also are helpful to address certain legal issues that may arise in school-police partnerships. Chula Vista Police Chief and current California Police Chiefs Association President David Bejarano believes that, in a school-police partnership, "legal issues are of utmost importance."[20] School districts and police should be clear when and how to handle student searches, interviews by law enforcement, parental notification for arrests, and appropriate data gathering and sharing between agencies.

Student Searches and Seizures

Clarifying responsibility for searches and seizures is important because school administrators have a lower standard of "reasonable suspicion" in order to search a student and his or her backpack, locker, or car (if parked on campus), while police officers have a much higher standard of "probable cause" before searching a student or their property in order to ensure evidence collected is admissible in court.

The MOUs in San Francisco and Oakland make clear that officers should not be asked to interview students or collect evidence for disciplinary purposes unless such an investigation by the staff would pose a danger to themselves or others. Alternately, the Los Angeles MOU states that, "All marijuana violations SHALL (emphasis in MOU) include the assistance of LASPD for purposes of contraband recovery."[21]

Student Interviews or Questioning

MOUs can ensure that a student suspected of wrongdoing, before being interviewed or questioned by a law enforcement officer, be advised of his or her rights in a clear and understandable manner. The San Francisco and Oakland MOUs both provide that, after an arrest, the Miranda admonishment be given and students be informed that parents can be present for questioning.

In San Francisco, the MOU protects the rights of student victims or witnesses by providing that, "[parent notification and Miranda admonishment] procedures shall apply to avoid any harm to a victim or witness who may later be considered a suspect."

Pasadena has a "Protocol for Administrators when Law Enforcement Personnel Questions Students," which is outlined in an Administrative Regulation that the MOU requires all school personnel to be trained on annually.

Parental Notification and Consent

When a student is arrested, California Education Code 48906 requires school officials to make immediate contact with a parent or guardian regarding where the student is being taken (except when a student is taken into protective custody as a suspected victim of child abuse).

The San Francisco, Oakland and Los Angeles MOUs have a section on Parental Notification and cite Education Code 48906. The Oakland MOU goes further by

providing that a school official must get oral consent from a parent or guardian before interrogation of a minor, and if a parent does not want his or her child questioned without the parent or guardian, the student may not be made available to law enforcement for questioning until the parent is present.

Student Privacy

Another issue that MOUs can address deals with student privacy. Multiple federal and state laws and regulations limit information sharing between agencies. For example, the federal Family Educational Rights and Privacy Act (FERPA) prevents local police departments from accessing student education information without an agreed-upon process to ensure privacy. The federal Health Insurance Portability and Accountability Act (HIPPA) creates barriers to sharing health care information between agencies. Additional state and local privacy regulations may apply.

The Oakland MOU addresses the privacy issue directly in a section of the MOU titled, "Confidentiality and Information Exchange." This section acknowledges FERPA and additional state and federal codes, and advises that, "OPD … will be permitted access to student data only where permissible under state and federal law and as set forth in this MOU." It specifically identifies the limited amount of information that can be shared with officers when dealing with truancy abatement. The section also explains that all partners who come into contact with any information in the course of their duties pursuant to the MOU shall maintain confidentiality of records in accordance with applicable federal and state laws and regulations.

Of note, the Los Angeles MOU, which addresses school police officers rather than officers from a municipal police department, does not mention privacy issues at all. There are fewer barriers to sharing student data with school police officers because they are technically employed by the school district and are acting as "school officials."

The MOUs in San Francisco, Oakland, and Los Angeles add that any arrest that needs to be made on campus shall be arranged in a private location to avoid invasion of a student's privacy and disruption of the school campus.[22] Additionally, the MOUs in San Francisco, Oakland and Pasadena encourage police to make their best efforts to handle non-school-related issues off campus, which bolsters student privacy.

5. Data Collection and Reporting

MOUs often cover the process for appropriate data collection, analysis and reporting in order to evaluate the effectiveness of the partnership and identify strengths and weaknesses. In addition to identifying who will collect the information, the levels of disaggregation, and how it will be shared both internally and publicly, *The School Discipline Consensus Report* states that data collection agreements can be used to evaluate "to what extent school policies and police officer actions may be disproportionately impacting students of color, those with special needs, or other affected youth."[23] The *Consensus Report* goes on to include the importance of school climate surveys as another source of metrics that benefit both partners and can be used in conjunction with commonly available law enforcement data, such as arrest rates and calls for service.

The MOUs in San Francisco, Oakland, and Pasadena include differing levels of data collection on a variety of elements such as crime incidents reported to or observed by a school officer, number of times officers are called to campus, number of arrests of students, truancy, feedback and disputes, referrals and diversions, referrals to Child Protective Services, and other information deemed important by local stakeholders. The data collection requirements for Los Angeles are included in the School Climate Bill of Rights rather than the MOU itself.

More specifically, in both San Francisco and Oakland MOUs, the police departments are tasked with providing written reports to school district staff and the Boards of Education with defined data to be collected and shared. Much of the data is to be disaggregated by school site, offense, disposition, and student subgroup including, but not limited to, age, race, ethnicity, and gender. The San Francisco Police Department is required to share monthly reports with district staff and then compile those monthly reports three times a year to share with the Board of Education to review the progress of the partnership. The Oakland Police Department does not have the same monthly reporting requirements, but it is required to compile and share disaggregated data twice a year with the Board of Education to assess the impact of the program. In Pasadena, without specifics on timing or data disaggregation, the MOU requires the Police Chief to provide activity reports summarizing SRO activities directly to the Superintendent.

Both San Francisco and Oakland MOUs also encourage the usage of data analysis and sharing to address "efforts to reduce disproportionate minority contact with police and the juvenile justice system [and] reduce the rate of school-based arrests and citations while maintaining a safe school climate." In Los Angeles, while data collection is not discussed in detail in the MOU, it is an expectation that LASPD "will continue to review data on campus-based enforcement practices to further enhance positive student outcomes."[24]

6. Evaluation Procedures for the Partnership

An MOU can also help facilitate evaluation of the effectiveness of the partnership based on the stated goals and desired outcomes through data collection and analysis and regularly scheduled meetings with school sites and reports back to the board of education.
The three closing sections in the San Francisco MOU provide guidance for evaluations of the SRO Program, usage of school climate surveys, and inclusion of student voices in evaluations. In the spirit of strengthening youth-police relationships and encouraging youth leadership, the MOU provides that the SFUSD Restorative Practices Task Force shall include at least two student members and is tasked with gathering feedback and providing findings and recommendations related to compliance with the MOU. Also empowering youth, representatives from the SFUSD Student Advisory Council are given the opportunity to comment on program reports given by SFPD to the Board of Education.

San Francisco and Oakland provide that the officers coordinating each program are encouraged to meet with site principals during the second semester to address any issues or concerns that may have arisen in the first half of the school year.

Compared to San Francisco, the three remaining MOUs provide less guidance on evaluating the partnership. In Oakland, in addition to meeting during the second semester, the officer coordinating the program is expected to meet site principals on an "as-needed basis when any issue arises that needs to be addressed." In Pasadena, the only mention of program evaluation, other than a reference to an annual review of the MOU, is where the Safe Schools Team coordinator is tasked with meeting the school-site principal monthly to "identify issues and evaluate progress." Although not explicitly under the rubric of program evaluation, the MOU also calls for the Police Commander to make bi-annual visits to the School District's Safety Committee to provide a summary of SRO activity where the opportunity exists to ask questions of the Commander and evaluate the partnership.

Additionally, MOUs often incorporate some process for handling disputes with officers or complaints about the partnership. In Los Angeles, the dispute and complaint process is laid out in the School Climate Bill of Rights instead of the MOU.

7. Funding or Cost-Sharing

School-police partnerships are funded from many different sources ranging from school district or municipal police department budgets to federal grants and other funding streams. Some MOUs include the financing or cost-sharing structure of the partnership. The opening "Recitals" of the Oakland MOU explain that the Oakland Police Department was awarded a grant from the U.S. Department of Justice for a COPS Hiring Program to fund 25 Oakland Police Officers in the School Safety Officer Program over a three-year period. In Pasadena, the MOU states that the cost for school assigned officers rests solely with the City of Pasadena. The MOUs for San Francisco USD and Los Angeles USD make no mention of funding.

8. Terms of the Agreement and Schedule for Review and Renewal

An MOU may include the length that the agreement is binding, and how the agreement can be modified, renewed, or terminated early if needed. MOUs in both San Francisco and Pasadena are effective for five years, can be modified by written agreement by both parties, and can be terminated at any time by either party with advance written notice. Oakland's MOU is similar but lasts for only three years and terminates if/when the federal COPS funding expires.

Conclusion

More and more school-police partnerships are being created or coming under scrutiny around the state. Communities that want to build or manage their school-police partnerships have different needs and goals, creating a situation where there is no "one size fits all" model of SRO programs. To overcome this challenge, districts, police departments, parents, students, and community stakeholders can collaborate to clarify the roles and responsibilities of officers, define the threshold for when to include police in a school incident, outline the goals and expectations of the partnership, address legal issues, and provide a governance structure. As in the cases of Los Angeles, Oakland, Pasadena, and San Francisco, these collaborations can result in concrete Memoranda of Understanding to formalize their partnerships, while providing benefits to schools, police, students and communities.

Links to Four MOUs and Additional Resources

San Francisco
http://www.fightcrime.org/san-francisco-mou-signed-original-2014/

Oakland
http://www.fightcrime.org/oakland-mou-signed-original-2014/

Pasadena
http://www.fightcrime.org/pasadena-mou-signed-original-2013/

Los Angeles
http://www.fightcrime.org/los-angeles-school-police-guiding-principles-2014/

The School Discipline Consensus Report
http://www.fightcrime.org/the-school-discipline-consensus-report/

Appendix A – Sample Graduated Response System – Los Angeles

LASPD ADMINISTRATIVE REFERRAL AND DIVERSION MATRIX

Minor violations of the law listed below should be handled through school-site administrative interventions or Diversion Referrals as specified in the Guideline. A Diversion Referral should be used as a graduated response. In most cases, students should be directed for "Administrative Referral" on campus for a first-time incident. Officers shall refer to LASPD Notice 14-002 for additional guidance. For students 12 years and younger, officers are reminded to refrain from issuing citations, Diversion Referrals, or making an arrest for minor law violations pursuant to the LASPD Chief of Police directive *Incidents Involving Subjects 12 Years and Younger* (December 1, 2013).

For students ages 13-17 who commit certain offences, the following applies:

- School-site Administrative Referral.
- School-site Administrative Referral or Diversion Referral for repeat offender per LASPD Guidelines.
- Diversion Referral or School-site Administrative Referral at officer's discretion (exceptions outlined below):



Violation	Code Section	Consequences (for students ages 13-17)	Education Code Section / MiSiS Code (MC)
Possession of tobacco and/or tobacco paraphernalia	**308(b) P.C.**	**Administrative Referral unless directed otherwise by supervisor**	**Possessed or used tobacco E.C. 48900(h); 48915(e) / MC-3.6**
Theft of property less than $50 (District property)	**490.1(a) P.C.**	**Administrative Referral unless directed otherwise by supervisor**	**Stole or attempted to steal school or private property. E.C. 48900(g); 48915(e) / MC-3.5**
***Trespassing**	**602.8 P.C. and related municipal/county code violations**	**Administrative Referral unless directed otherwise by supervisor**	**Truancy during school hours. E.C. 48260 (a) MC- Not Applicable**
**** Possession of marijuana less than 1 ounce, 1st offense (only if not found smoking)**	**11357(b) H&S 11357(e) H&S**	**Administrative Referral or Diversion Referral if repeat offender**	**Marijuana possession for 1st offense of < 1oz. E.C 48900(c); 48915(b) / MC-3.2**
Fighting / Challenging to Fight	**415(1) P.C. 415.5 P.C.**	**Administrative Referral or Diversion Referral if repeat offender**	**Attempted to cause physical injury to another person. Caused physical injury to another person. E.C.48900(a)(1); 48915(B) / MC-3.1 a,b,c**
Minor in possession of alcohol-1st offense	**25662(a) B&P**	**Administrative Referral or Diversion Referral if repeat offender**	**Alcohol possession for 1st offense E.C. 48900(c); 48915(e) / MC-3.2**
Vandalism less than $400 damage (District property)	**594(a) (1) P.C. 594(a) (2) P.C. 594(a) (3) P.C. 594.1(e)(1) P.C.**	**Administrative Referral or Diversion Referral if repeat offender**	**Caused or attempted to cause damage to school or private property. E.C. 48900(f); 48915(e) / MC-3.4**
***Battery (see exceptions applicable to Battery diversion only)**	**242 & 243.2(a) P.C.**	**Diversion Referral or per discretion of officer, Administrative Referral**	**Willful use of force/violence not in self-defense E.C.48900(a)(1); 48915(b) / MC 3.16**

Appendix B – Sample Graduated Response System – San Francisco

19. GRADUATED RESPONSES TO LOW-LEVEL SCHOOL BASED OFFENSES

Subject to the exception described below, when SFPD officers make a school based arrest they should use the graduated response system outlined below and they shall make every effort to not refer a student to San Francisco County Juvenile Probation's Community Assessment and Referral Center ("CARC") for the commission of a low-level school-based offense, defined as an offense involving battery, battery on school property, battery against a school employee, attempt to resist arrest, disturbing the peace, or possession of marijuana for personal use, unless the student has committed his or her third or subsequent similar offense during the school year.

(A) First Offense: If a student commits a low-level school-based offense, an SFPD officer shall have the discretion to admonish and counsel or take no action.
(B) Second Offense: Upon the commission of a subsequent, similar low-level school-based offense in the same school year, law enforcement shall have the discretion to admonish and counsel, or require the student to attend a SFUSD or other diversion program.
(C) Third or subsequent offense. For a student who commits a third or subsequent offense, SFPD may refer the case to CARC/Juvenile Probation for filing with the Court or further diversion. If the student has attended a diversion program in that year or any previous school year and the student has committed a similar low-level school-based offense, the next similar minor school-based offense may result in a complaint being filed with the Court.

Notwithstanding this graduated response system, an SFPD officer has the discretion to refer the case to CARC.

Appendix C – List of Possible Roles for School Officers[25]

1. Crisis preparation (natural disasters, critical incidents)
2. Participation on school safety committees
3. Facility security planning and implementation (including crime prevention through environmental design)
4. Risky behavior intervention and prevention including drugs, weapons, gangs, and bullying
5. Other crime-prevention and education activities (including about driving under the influence, texting while driving, or the impact of graffiti)
6. De-escalation of fights or threats to safety
7. Connections to diversion programs, supports and services in school, and referrals to school discipline personnel to help minimize arrests for minor misconduct
8. Mentoring (in-school or after-school)
9. Event and facility security, such as security at the start and end of school and traffic control
10. Encouraging reporting of sexual or child abuse
11. Monitoring of "spill-over" crimes from the community to the school and from the school to the community
12. School-police athletic programs and other structured positive programming
13. Safe passage programs for students to and from school for high-gang and violence areas
14. Problem-solving partnerships to resolve crime and safety problems on campus
15. Coordination with local juvenile justice service providers to provide reentry assistance for students on probation or returning from detention facilities or alternative programs
16. Attendance improvement and truancy reduction through problem solving
17. Liaison with community- and faith-based organizations and other service providers

Citations

[1] These issues can also be addressed with intervention workers and restorative practices.
[2] California Department of Education (n.d.). *DataQuest.* Retrieved from: http://dq.cde.ca.gov/dataquest/page2.asp?level=District&subject=Enrollment&submit1=Submit.
[3] Raymond, B., *Assigning Police Officers to Schools*, U.S. Department of Justice, Community Oriented Policing Services Office, Problem-Oriented Guides for Police Response Guides Series No. 10, Washington, DC, April 2010, Page 3. Retrieved from: http://www.cops.usdoj.gov/Publications/e041028272-assign-officers-to-schools.pdf.
[4] In these cases, it is important to ensure that all locally sworn uniformed police officers who do not have specialized training on issues around youth and schools and who have not built relationships with students and school staff, are aware of the MOU and have been trained on the role of officers on campus, especially when it comes to student discipline.
[5] Personal communication with David Bejarano (January 28, 2016). David Bejarano is the Chief of Police of the Chula Vista Police Department and current President of the California Police Chiefs Association.
[6] Thurau, L., and Wald, J., *Controlling Partners: When Law Enforcement Meets Discipline in Public Schools*, New York Law School Law Review, Volume 54, 2009/10, Page 991. Retrieved from: http://www.nylslawreview.com/wp-content/uploads/sites/16/2013/11/54-4.Thurau-Wald.pdf.
[7] Finn, P., Shively, M., McDevitt, J., Lassiter, W., & Rich, T., *Comparison of Program Activities and Lessons Learned Among 19 School Resource Officer (SRO) Programs,* Abt Associates, Inc., Cambridge, MA, March 2005, Page 27. Retrieved from: https://www.ncjrs.gov/pdffiles1/nij/grants/209272.pdf.
[8] COPS Office. *Memorandum of Understanding Fact Sheet (May 2015)*, U.S. Department of Justice. Washington, DC, May, 2015. Retrieved from: http://www.cops.usdoj.gov/pdf/2015AwardDocs/chp/CHP_MOU_Fact_Sheet.pdf.
[9] Morgan, E., Salomon, N., Plotkin, M., and Cohen, R., *The School Discipline Consensus Report: Strategies from the Field to Keep Students Engaged in School and Out of the Juvenile Justice System,* The Council of State Governments Justice Center, New York, 2014, Pages 256-266. Retrieved from: https://csgjusticecenter.org/wp-content/uploads/2014/06/The_School_Discipline_Consensus_Report.pdf.
[10] Ibid., Page 256.
[11] Raymond, B., *Assigning Police Officers to Schools*, Page 6.
[12] Lindberg, M., *False Sense of Security,* Teaching Tolerance Magazine, A Project of the Southern Poverty Law Center, Montgomery, AL, Summer, 2015, Page 24. Retrieved from: http://www.tolerance.org/magazine/number-50-summer-2015/feature/false-sense-security.
[13] California Education Code Section 48902 defines when it is mandatory to call law enforcement. These situations include assault with a deadly weapon, possessing or selling a controlled substance, and possessing, selling, or furnishing a firearm or explosive. Retrieved from: http://www.leginfo.ca.gov/cgi-bin/displaycode?section=edc&group=48001-49000&file=48900-48927.
[14] See also Pasadena USD Board Policy and Administrative Regulation 5145.11.
[15] Raymond, B., *Assigning Police Officers to Schools*, Page 31.
[16] See also Pasadena USD Board Policy and Administrative Regulation 5145.11 and 5145.12.
[17] Morgan, E., Salomon, N., Plotkin, M., and Cohen, R., *The School Discipline Consensus Report*, Page 258.
[18] Ibid., Page 261.
[19] COPS Office. *Memorandum of Understanding Fact Sheet (May 2015).*
[20] Personal communication with David Bejarano (January 28, 2016). David Bejarano is the Chief of Police of the Chula Vista Police Department and current President of the California Police Chiefs Association.
[21] See also Pasadena USD Board Policy and Administrative Regulation 5145.11 and 5145.12.
[22] Ibid.
[23] Morgan, E., Salomon, N., Plotkin, M., and Cohen, R., *The School Discipline Consensus Report*, Page 264.
[24] The LAUSD School Climate Bill of Rights provides further guidance on data collection and disaggregation.
[25] Ibid., Page 208.