

# ARTICLES

## Using Spatial and Qualitative Analysis to Rethink School Policing

TERRY ALLEN\*

*When researchers typically think about the problem of policing in schools, we tend to focus on the experiences of Black children in majority-Black and Latino schools. This body of scholarship has shown that Black students disproportionately experience negative police encounters in majority-Black and Latino schools compared to other racial and ethnic counterparts. But there is another relatively unexplored phenomenon about race and policing in schools: Black students who attend majority-white schools experience higher rates of negative police encounters than their counterparts in majority-Black and Latino schools.*

*In this Article, I provide one of the first mixed methods empirical analyses of Black students' experiences with school policing in majority-white schools. Using content and spatial analytical methods of school police arrest and citation data in Los Angeles County, I first show, perhaps counterintuitively, that (1) Black students in majority-white schools are more at risk of involvement with law enforcement than Black students in majority-Black and Latino schools, and (2) Black students in majority-white schools are more likely than any other group to be cited and arrested for minor public order offenses such as public disturbance and classroom disruption. These results are unexpected, so I urge readers to exercise caution and not make generalizations.*

*Next, I use interview data from ninety-five Black high school students who attend majority-white schools that have a police presence to show how the police impact the educational experiences of Black students. Two key findings emerge. First, police and others reinforce the idea that Black students do not belong in white spaces, and second, Black students face constant scrutiny that their white counterparts avoid. These interactions play a pivotal role in determining entitlement to education, the right to occupy*

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\* Research Assistant Professor of Law and inaugural Race, Place, and Equity Postdoctoral Fellow, University of Virginia School of Law. © 2024, Terry Allen. For insightful feedback at different stages of this project, I thank LaToya Baldwin Clark, Josh Bowers, Jay Butler, Barbara Fedders, Bennett Capers, Guy-Uriel Charles, Elise Boddie, Devon Carbado, Beth Colgan, Anne Coughlin, Kim Forde-Mazrui, Jonathan Glater, Rachel Harmon, Craig Konnoth, Mike Livermore, Jason Nance, Pedro Noguera, Richard Re, Bertrall Ross, Joy Ross, Megan Stevenson, and Noah Zatz. I appreciate the helpful comments provided by Jonathan Simon and Zohra Ahmed during the Emerging Scholars in Law and Political Economy (LPE) conference at Harvard Law School. This work would not have happened without the students who shared their stories, including participants of the Vice-Provost Initiative for Pre-College Scholars Program and Youth Justice Coalition. I am also indebted to my research assistants Ashley Williams and Joseph Pierson. Finally, a special thanks to Samantha Purdy, Tate Rosenblatt, Josh Cape, Ava Kamb, and the other *Georgetown Law Journal* Senior Board and Staff members for their excellent suggestions and editorial support. All errors are my own.

*majority-white spaces, the acceptability of student behaviors, and the justification of punitive or nonpunitive actions in response to established norms and rules violations.*

*I offer a two-step proposal for reform to reduce the footprint of policing in majority-white schools. The first, a long-term goal, is for school districts to remove police from within schools. With the removal of officers, the next step is for school leaders to realign the role of officers to focus on emergencies and protecting school property, as originally intended, instead of everyday student interactions.*

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## INTRODUCTION

Over the past few decades, policing has emerged as a common institutional feature of U.S. public schools.<sup>1</sup> While scholars have engaged with the phenomenon largely, though not entirely, by examining the presence and impact of school police officers in predominantly Black and Latino<sup>2</sup> schools and neighborhoods,<sup>3</sup> little is known about how the presence of school police officers shapes the experiences of Black students in predominantly white schools.<sup>4</sup> This Article utilizes data from school police records and interviews with Black students to better understand how school police officers may affect their educational experiences in predominantly white school settings.

Nearly half of public schools, 44%, have police officers on duty.<sup>5</sup> This is a significant increase from just 1% back in the 1970s.<sup>6</sup> Police officers are most

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1. See Jason P. Nance, *Students, Security, and Race*, 63 EMORY L.J. 1, 6 (2013); see also Elizabeth Hinton, *Creating Crime: The Rise and Impact of National Juvenile Delinquency Programs in Black Urban Neighborhoods*, 41 J. URB. HIST. 808, 815–16 (2015); Pedro A. Noguera, *Re-thinking School Safety*, IN MOTION MAG. (June 2, 2004), [https://www.inmotionmagazine.com/er/pn\\_re\\_safety.html](https://www.inmotionmagazine.com/er/pn_re_safety.html) [<https://perma.cc/3ZNR-XJVE>].

2. In an effort to use language inclusive of all genders, I use Latino and Latinx interchangeably throughout the Article.

3. See CARLA SHEDD, UNEQUAL CITY: RACE, SCHOOLS, AND PERCEPTIONS OF INJUSTICE 99, 149 (2015) (describing how the combined impact of aggressive policing and physical security constitute an inward turning “criminal gaze” that views entire student bodies as suspicious); see also JIM FREEMAN, DANIEL KIM & ZOE RAWSON, CMTY. RTS. CAMPAIGN, LAB./CMTY. STRATEGY CTR., BLACK, BROWN, AND OVER-POLICED IN L.A. SCHOOLS: STRUCTURAL PROPOSALS TO END THE SCHOOL-TO-PRISON PIPELINE IN THE LOS ANGELES UNIFIED SCHOOL DISTRICT AND TO BUILD A NATIONAL MOVEMENT TO STOP THE MASS INCARCERATION OF BLACK AND LATINO COMMUNITIES 9–25 (2013), [https://thestrategycenter.org/wp-content/uploads/2017/07/lcsc-overpoliced.web\\_release.10.30.13\\_1.pdf](https://thestrategycenter.org/wp-content/uploads/2017/07/lcsc-overpoliced.web_release.10.30.13_1.pdf) [<https://perma.cc/FJ3V-XCTS>]; Benjamin W. Fisher, Ethan M. Higgins, Aaron Kupchik, Samantha Viano, F. Chris Curran, Suzanne Overstreet, Bryant Plumlee & Brandon Coffey, *Protecting the Flock or Policing the Sheep? Differences in School Resource Officers' Perceptions of Threats by School Racial Composition*, 69 SOC. PROBS. 316, 317 (2022).

4. See ALEXIS STERN & ANTHONY PETROSINO, WESTED JUST. & PREVENTION RSCH. CTR., WHAT DO WE KNOW ABOUT THE EFFECTS OF SCHOOL-BASED LAW ENFORCEMENT ON SCHOOL SAFETY? 3 (2018), <https://www.wested.org/wp-content/uploads/2018/04/JPRC-Police-Schools-Brief.pdf> [<https://perma.cc/ZRD3-58WA>] (concluding that there has been “little rigorous evaluative research on the effects – in terms of school safety – of having a police presence in schools,” and asserting that the existing literature “fails to support a school safety effect”). In some regions like California, many schools are predominantly white or are increasingly becoming predominantly Latino, leading to Black students being a “minority within a minority.” GARY ORFIELD & RYAN PFLEGER, THE UNFINISHED BATTLE FOR INTEGRATION IN A MULTIRACIAL AMERICA – FROM BROWN TO NOW 77 (2024), <https://civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/the-unfinished-battle-for-in-tegration-in-a-multiracial-america-2013-from-brown-to-now/National-Segregation-041624-CORRECTED-for.pdf> [<https://perma.cc/F5QM-R8DX>]. For purposes of this Article, I refer to both of these schools as majority- or predominantly white. Future research is needed to understand the impacts of school policing across these two settings.

5. RILEY BURR, JANA KEMP, KE WANG & DEANNA SWAN, NAT’L CTR. FOR EDUC. STAT., U.S. DEP’T OF EDUC., CRIME, VIOLENCE, DISCIPLINE, AND SAFETY IN U.S. PUBLIC SCHOOLS: FINDINGS FROM THE SCHOOL SURVEY ON CRIME AND SAFETY: 2021–22, at 20 (2024), <https://nces.ed.gov/pubs2024/2024043.pdf> [<https://perma.cc/H45L-ETXN>]; see Terry Allen & Pedro Noguera, *A Web of Punishment: Examining Black Student Interactions with School Police in Los Angeles*, EDUC. RESEARCHER, Mar. 29, 2023, at 1, 2 (noting a slightly higher percentage of schools, 48%, in the 2015–16 academic year).

6. Allen & Noguera, *supra* note 5, at 2.

commonly found in schools with lower income students, especially those that serve a mostly Black and Latinx student body.<sup>7</sup> Approximately 85% of Black students go to schools where there are police officers, which is more than any other racial group.<sup>8</sup>

This Article begins by documenting patterns of policing at schools in South Central Los Angeles—a low-income community comprised largely of Black and Latino residents.<sup>9</sup> In South Central Los Angeles's Black and Latino schools, Black students have higher rates of school police arrests and citations compared to their racial and ethnic counterparts.<sup>10</sup> I utilize spatial,<sup>11</sup> content, and qualitative analysis to identify where school policing activities across Los Angeles have been concentrated; examine the charges for arrest and citation of Black students in these areas; document how race and space interact to influence interactions between school police officers and Black students; and discuss the policy and legal implications of these interactions for Black students' experiences in predominantly white schools.

Interestingly, though, patterns of policing in Los Angeles appear to pose a unique problem in predominantly white schools, where the presence of police officers is a common practice as well.<sup>12</sup> My findings show that Black students in majority-white schools are more at risk of involvement with school police officers than Black students in majority-Black and Latino schools. Black students in predominantly white schools are more likely to be cited or arrested for public disturbance than any other racial and ethnic student group, and they are also more likely to be cited and/or arrested for public disturbance than for committing violence or causing harm.

Two implications emerge from these findings. The first is that interactions with police officers and other stakeholders reinforce the notion that Black students do not belong in “white spaces.”<sup>13</sup> The second is that Black students face constant

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7. *Id.*; see Nance, *supra* note 1, at 41 (drawing on data from the U.S. Department of Education to show that students from low-income backgrounds and students of color are more likely to attend schools with high-security measures, a pattern that persists even when considering factors like neighborhood and school crime rates).

8. Allen & Noguera, *supra* note 5, at 2.

9. See Andre Comandon & Paul Ong, *South Los Angeles Since the 1960s: Race, Place, and Class*, 47 REV. BLACK POL. ECON. 50, 62 (2020) (comparing demographic data for South Los Angeles with Los Angeles County).

10. See Allen & Noguera, *supra* note 5, at 5–6.

11. This is a form of Geographic Information System (GIS) analysis, which connects data to a map by integrating location data (where things are) with descriptive information (what things are like there).

12. See DAVID C. TURNER III, ASHLEIGH WASHINGTON, VICTOR LEUNG, BILLY EASTON, ELIANNY EDWARDS, EARL EDWARDS, NICOLE BATES, DELIA ACEDO, KRYSTAL BOWSER, JAN WILLIAMS, SARAH DIATO, CASSANDRA CASTILLO-TAPIA, DRANAE JONES, JADE GREEN & EDGAR IBARRIA, POLICE FREE LAUSD COAL., FROM CRIMINALIZATION TO EDUCATION: A COMMUNITY VISION FOR SAFE SCHOOLS IN LAUSD 23 (2022), <https://knock-la.com/wp-content/uploads/2023/02/The-Peoples-Plan-Police-Free-LAUDS-Coalition-Safe-Schools-LA-REPORT.pdf> [<https://perma.cc/SHL8-YPYG>] (noting that police presence is a common practice in all schools in Los Angeles Unified School District).

13. Elijah Anderson, “*The White Space*,” 1 SOCIO. RACE & ETHNICITY 10, 13–15 (2015). White spaces are areas, both physical and social, conceptualized by scholars as primarily white. These places tend to reinforce a norm where Black people are either absent, not expected, or marginalized when

scrutiny that their white counterparts typically avoid. These police–student interactions ultimately are determined by who is considered entitled to or has the right to occupy white space, which student behaviors are deemed acceptable, and the justification of punitive and nonpunitive measures taken in response to violations of established norms and rules.

This Article proceeds in four Parts. Part I expands the traditional account of school policing in existing literature<sup>14</sup> and underscores how police–student interactions are race- and place-based inquiries. Part II starts by reporting the content and spatial analysis of school police arrest and citation data from the Los Angeles School Police Department, one of the largest independent school forces in the country.<sup>15</sup> These data are used to map where school policing activities in Los Angeles County have been concentrated and examine the charges for arrest and citation of students in these areas. Next, Part III reports the results of qualitative analyses of data collected from student interviews.<sup>16</sup> Finally, Part IV takes a normative turn and offers some prescriptive suggestions for policymakers and courts. I first propose interrogating the recommendation that has been made in some communities for police officers to be removed from schools and for school

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present. White spaces often work to keep out Black individuals and historically marginalized groups by normalizing whiteness, implementing punishments, distributing resources unfairly, and outright denying membership. This racial norm and exclusionary behavior are observed in various institutions, such as predominantly white schools and neighborhoods. *See id.*

14. Existing literature focuses on the impacts of school policing on particular marginalized communities, especially those burdened by the greatest historical vulnerability to punitive interactions such as detention and arrest. *See* sources cited *supra* note 3.

15. Mike Szymanski, *How Is the Largest School Police Force in the Nation Keeping LA's Children Safe?*, LA SCH. REP. (Oct. 24, 2016), <https://www.laschoolreport.com/how-is-the-largest-school-police-force-in-the-nation-keeping-las-children-safe/> [<https://perma.cc/N6BM-TFCG>].

16. Failing to recognize the significance of spatial inequality beyond individual- and school-based harms when addressing the issues of school policing would be inconsistent with the approaches to policing at the neighborhood and community levels. *See* Robert J. Sampson & Charles Loeffler, *Punishment's Place: The Local Concentration of Mass Incarceration*, 139 DAEDALUS 20, 22–25 (2010); Devon W. Carbado, *Blue-on-Black Violence: A Provisional Model of Some of the Causes*, 104 GEO. L.J. 1479, 1491–95 (2016) (describing how racial disparity interacts with particular geographic areas, or “war zones,” that experience disproportionate enforcement); Tracey L. Meares, *Programming Errors: Understanding the Constitutionality of Stop-and-Frisk as a Program, Not an Incident*, 82 U. CHI. L. REV. 159, 164–65 (2015) (suggesting that individualized analysis under *Terry v. Ohio* may not capture the completely discriminatory nature of stops in the aggregate, and that courts should take a more expansive view); Jeffrey A. Fagan, Amanda Geller, Garth Davies & Valerie West, *Street Stops and Broken Windows Revisited: The Demography and Logic of Proactive Policing in a Safe and Changing City*, in RACE, ETHNICITY, AND POLICING: NEW AND ESSENTIAL READINGS 309, 329–31 (Stephen K. Rice & Michael D. White eds., 2010) (analyzing the relationship between neighborhood conditions and the incidence of street stops); Jeffrey Fagan & Garth Davies, *Street Stops and Broken Windows: Terry, Race, and Disorder in New York City*, 28 FORDHAM URB. L.J. 457, 477–78 (2000) (presenting evidence which suggests that police officers are more likely to stop people “who seem out of place from their surroundings”); Andrew Gelman, Jeffrey Fagan & Alex Kiss, *An Analysis of the New York City Police Department's “Stop-and-Frisk” Policy in the Context of Claims of Racial Bias*, 102 J. AM. STAT. ASS'N 813, 822 (2007) (finding that people of color were stopped disproportionately in New York City, a fact which was exacerbated when controlling for differences in precincts); Report of Plaintiff's Expert Dr. Jeffrey Fagan at 18–19, *Ligon v. City of New York*, 925 F. Supp. 2d 478 (S.D.N.Y. 2013) (No. 12 Civ. 2274) (analyzing stops by the New York City Police Department using multivariate models); Allen & Noguera, *supra* note 5, at 2.

districts to eliminate or substantially reduce the budget of school police departments. Second, I propose realigning the role of school police officers to its historical foundation of protecting school property.<sup>17</sup> Undoubtedly, as more communities question the harm caused by the presence of police officers in schools, such calls for change are likely to grow.

### I. THE TRADITIONAL ACCOUNT OF SCHOOL POLICING

Who are school police officers, and what do they do? Simply put, school police officers work for independent school district police departments under the school district's control.<sup>18</sup> They are sworn officers with arrest powers assigned to schools to ensure safety and order.<sup>19</sup> Over time, the role of school-based law enforcement has evolved. Research indicates that school police officers often take on three main roles: teaching, informal mentoring and counseling, and law enforcement.<sup>20</sup> This Part contextualizes the evolution of school police roles by briefly exploring school policing's dramatic expansion and how race and space increasingly influence officers' policing approaches and actions.

#### A. THE EXPANSION OF SCHOOL POLICING

Over the last two decades, as a result of school leaders enacting increasingly punitive disciplinary policies, the presence of police officers in schools has increased.<sup>21</sup> According to the National Center for Education Statistics, approximately 44% of public schools in the United States have sworn law enforcement officers.<sup>22</sup> Recent research has described an appetite among the general public and educational institutions for containing and controlling students to deter crime for safety and security purposes.<sup>23</sup>

National data reveal that 1.6 million students attend schools that, on the one hand, employ a sworn law enforcement officer but, on the other hand, do not employ a single school counselor.<sup>24</sup> Black, Latinx, and Asian students are all

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17. See *infra* Section IV.B.

18. Allen & Noguera, *supra* note 5, at 1–2.

19. See *id.*

20. *Id.* at 3.

21. See Jason P. Nance, *Students, Police, and the School-to-Prison Pipeline*, 93 WASH. U. L. REV. 919, 946 & n.128 (2016).

22. See BURR ET AL., *supra* note 5, at 20. Sworn law enforcement typically includes school police officers and school resource officers, but not security guards or security personnel. *Id.*; see also Table 233.70. *Percentage of Public Schools with Security Staff Present at Least Once a Week, and Percentage with Security Staff Routinely Carrying a Firearm, by Selected School Characteristics: 2005-06 Through 2015-16*, INST. EDUC. SCIS.: NAT'L CTR. FOR EDUC. STAT., [https://nces.ed.gov/programs/digest/d18/tables/dt18\\_233.70.asp](https://nces.ed.gov/programs/digest/d18/tables/dt18_233.70.asp) [<https://perma.cc/7RJ6-5B49>] (last visited Mar. 15, 2024).

23. See generally LOÏC WACQUANT, *PUNISHING THE POOR: THE NEOLIBERAL GOVERNMENT OF SOCIAL INSECURITY* (2009); Hinton, *supra* note 1; DAMIEN M. SOJOYNER, *FIRST STRIKE: EDUCATIONAL ENCLOSURES IN BLACK LOS ANGELES* (2016).

24. U.S. COMM'N ON C.R., *BEYOND SUSPENSIONS: EXAMINING SCHOOL DISCIPLINE POLICIES AND CONNECTIONS TO THE SCHOOL-TO-PRISON PIPELINE FOR STUDENTS OF COLOR WITH DISABILITIES* 165 (2019), <https://www.usccr.gov/pubs/2019/07-23-Beyond-Suspensions.pdf> [<https://perma.cc/7WPW-9TYK>].



more likely than their white counterparts to attend a school with a sworn law enforcement officer and no counselor.<sup>25</sup> In predominantly Black and Latinx low-income urban communities, school police officers often have an expanded role, one that more closely resembles the duties previously assigned to school administrators, counselors, mentors, and social service providers.<sup>26</sup> While some police officers at schools may be perceived as part of the student support system, scholars have found that the increased presence of police officers on school grounds has led to the creation of multiple pathways for inducting Black and Latinx youth into the criminal justice system—also known as the school-to-prison pipeline.<sup>27</sup> Scholars often describe the school-to-prison pipeline or the school-to-prison nexus as the persistent and interconnected network of punitive measures between schools and prisons.<sup>28</sup> The relationship between policing and educational inequalities plays a significant role in Black students' increased risk of justice system involvement.<sup>29</sup>

School policing has become a part of daily life for many Black students, especially in poor, racially segregated neighborhoods.<sup>30</sup> National data show that Black students represent 18% of public school students referred to law enforcement and 22% of students subjected to school-related arrests, despite comprising 15% of the national K–12 student enrollment.<sup>31</sup> Black students are also disproportionately arrested and cited by school police officers compared to their peers of other racial and ethnic identities.<sup>32</sup>

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25. OFF. FOR C.R., U.S. DEP'T OF EDUC., 2020-21 CIVIL RIGHTS DATA COLLECTION: A FIRST LOOK: STUDENTS' ACCESS TO EDUCATIONAL OPPORTUNITIES IN U.S. PUBLIC SCHOOLS 12–13 (2023), <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-educational-opportunities-report.pdf> [<https://perma.cc/BRE7-XT9E>] (noting that Black students and students of two or more races were 1.2 times more likely to attend a school with a sworn law enforcement officer or security guard but without a school counselor); see F. Chris Curran, Benjamin W. Fisher, Samantha Viano & Aaron Kupchik, *Why and When Do School Resource Officers Engage in School Discipline? The Role of Context in Shaping Disciplinary Involvement*, 126 AM. J. EDUC. 33, 37 (2019).

26. See Lisa H. Thureau & Johanna Wald, *Controlling Partners: When Law Enforcement Meets Discipline in Public Schools*, 54 N.Y.L. SCH. L. REV. 977, 985 (2010).

27. See, e.g., Victor M. Rios, Greg Prieto & Jonathan M. Ibarra, *Mano Suave—Mano Dura: Legitimacy Policing and Latino Stop-and-Frisk*, 85 AM. SOCIO. REV. 58, 69 (2020) (discussing how police surveillance criminalizes targets); Nance, *supra* note 1, at 4 (discussing the movement towards criminalizing school discipline).

28. See Loïc Wacquant, *Deadly Symbiosis: When Ghetto and Prison Meet and Mesh*, 3 PUNISHMENT & SOC'Y 95, 108 (2001); ERICA R. MEINERS, RIGHT TO BE HOSTILE: SCHOOLS, PRISONS, AND THE MAKING OF PUBLIC ENEMIES 31–32 (2007) (noting how “[l]inkages between schools and jails are less a pipeline, more a persistent nexus or web of intertwined, punitive threads”); Damien M. Sojoyner, *Black Radicals Make for Bad Citizens: Undoing the Myth of the School to Prison Pipeline*, 4 BERKELEY REV. EDUC. 241, 242, 252 (2013); SOJOYNER, *supra* note 23, at xiv (“[R]ather than a funneling or pipeline system that transfers students from schools to prisons, particular forms of enclosures have been developed with particular aims.”).

29. See Nancy A. Heitzeg, *Education or Incarceration: Zero Tolerance Policies and the School to Prison Pipeline*, F. ON PUB. POL'Y, 2009, at 1, 1–2.

30. See U.S. COMM'N ON C.R., *supra* note 24, at 105; see also Kelly Welch & Allison Ann Payne, *Racial Threat and Punitive School Discipline*, 57 SOC. PROBS. 25, 28 (2010).

31. OFF. FOR C.R., *supra* note 24, at 19.

32. See TERRY ALLEN, ISAAC BRYAN, ANDREW GUERERRO, ALVIN TENG & KELLY LYTLE-HERNÁNDEZ, MILLION DOLLAR HOODS PROJECT, POLICING OUR STUDENTS: AN ANALYSIS OF L.A. SCHOOL POLICE DEPARTMENT DATA (2014-2017) (2018), <https://milliondollarhoods.org/wp-content/>

Several low-income Black and Latinx communities and schools are also subject to the spatial concentration of school policing.<sup>33</sup> In these areas, residential racial segregation often coincides with and reinforces socioeconomic stratification and has far-reaching political, social, and economic implications, including higher rates of arrests and citations, and greater risk of future incarceration.<sup>34</sup> Low-income Black students raised in racially segregated neighborhoods and educated in racially segregated schools are more likely to remain poor and be subjected to an array of disadvantaged outcomes as adults compared to students raised in non-Black and more racially diverse neighborhoods.<sup>35</sup>

The degree and scale of racial disparities in school policing raise a host of questions about its connection to other inequalities facing students.<sup>36</sup> As sociologists Weaver and Geller state, “[P]olicing of youth not only reflects inequality, it reproduces it.”<sup>37</sup> Police encounters affect students’ mental health and well-being, educational outcomes, economic prospects, and future civic and political engagement.<sup>38</sup> For instance, sociologist Legewie and legal scholar Fagan show that Black students who live in a high-concentrated impact area of policing

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uploads/2018/10/Policing-Our-Students-MDH-Report-Revised-10.30.18.pdf [https://perma.cc/8HHH-J2JT].

33. See U.S. COMM’N ON C.R., *supra* note 24, at 100; Vesla M. Weaver & Amanda Geller, *De-Policing America’s Youth: Disrupting Criminal Justice Policy Feedbacks that Distort Power and Derail Prospects*, 685 ANNALS AM. ACAD. POL. & SOC. SCI. 190, 218–19 (2019).

34. See, e.g., DOUGLAS S. MASSEY & NANCY A. DENTON, *AMERICAN APARTHEID: SEGREGATION AND THE MAKING OF THE UNDERCLASS* 77 (1993); Douglas S. Massey & Jonathan Tannen, *A Research Note on Trends in Black Hypersegregation*, 52 DEMOGRAPHY 1025, 1026 (2015); Terry Allen & Kimberly Gomez, *Navigating Spatial Enclosures: Race, Place, and School Policing*, SOC. PROBS., Nov. 27, 2023, at 1, 1–2, 8–9 (noting the changing ways communities and schools are organized and constituted and the emerging research about their relationship to disadvantaged neighborhoods). See generally RICHARD ARUM, *JUDGING SCHOOL DISCIPLINE: THE CRISIS OF MORAL AUTHORITY* (2003) (noting how the role of neighborhoods in reproducing social inequality must accompany sociological conceptualizations of community–school relationships). The degree and scale of school policing emerges out of a complex interaction between demographic factors and the institutional environment around schools. See generally ELIZABETH ANDERSON, *THE IMPERATIVE OF INTEGRATION* (2010). According to Anderson, “[s]uch racial profiling could not occur in integrated neighborhoods.” *Id.* at 42. While it likely could still occur, if police officers and departments exercise their own discretion and foreground the promotion of desegregation in their policies and practices, it would be significantly less likely.

35. See Elijah Anderson, *The Iconic Ghetto*, 642 ANNALS AM. ACAD. POL. & SOC. SCI. 8, 10–15 (2012); RICHARD ROTHSTEIN, *THE COLOR OF LAW: A FORGOTTEN HISTORY OF HOW OUR GOVERNMENT SEGREGATED AMERICA* 5–14 (2017).

36. MEGAN FRENCH-MARCELIN & SARAH HINGER, ACLU, *BULLIES IN BLUE: THE ORIGINS AND CONSEQUENCES OF SCHOOL POLICING* 5–6 (2017), [https://www.aclu.org/sites/default/files/field\\_document/aclu\\_bullies\\_in\\_blue\\_4\\_11\\_17\\_final.pdf](https://www.aclu.org/sites/default/files/field_document/aclu_bullies_in_blue_4_11_17_final.pdf) [https://perma.cc/5YBJ-NH5H].

37. Weaver & Geller, *supra* note 33, at 210.

38. See, e.g., Michael J. McFarland, Amanda Geller & Cheryl McFarland, *Police Contact and Health Among Urban Adolescents: The Role of Perceived Injustice*, 238 SOC. SCI. & MED., Aug. 13, 2019, at 1, 2; Amanda Geller & Jeffrey Fagan, *Police Contact and the Legal Socialization of Urban Teens*, 5 RUSSELL SAGE FOUND. J. SOC. SCIS. 26, 39 (2019); Amanda Geller, *Policing America’s Children: Police Contact and Consequences Among Teens in Fragile Families* (Fragile Fams., Working Paper No. WP18-02-FF, 2017); Amanda Geller, Jeffrey Fagan, Tom Tyler & Bruce G. Link, *Aggressive Policing and the Mental Health of Young Urban Men*, 104 AM. J. PUB. HEALTH 2321, 2323 (2014).



experience substantially more police stops as well as declining test scores.<sup>39</sup> Students who experience an arrest are much more likely to drop out of school and receive fewer years of education.<sup>40</sup>

Approximately 85% of Black students attend public schools where sworn law enforcement officers are present.<sup>41</sup> Studies reveal that the presence of police officers on school campuses significantly increases the likelihood that punitive disciplinary measures will be utilized against students.<sup>42</sup> Simply living and attending school in low-income Black communities—where school police presence is most pronounced<sup>43</sup>—puts Black students at special risk of falling victim to school policing.<sup>44</sup>

Although previous studies have focused largely on how policing is entrenched in the lives of students and the institutional fabric of poor, racially segregated—namely Black and Latinx—neighborhoods,<sup>45</sup> little is known about how the presence of school police officers shapes the experiences of Black students in predominantly white schools. While school policing for many K–12 Black students may not necessarily be the same in these spaces, the high visibility of Black students in relation to their smaller overall student population may exacerbate the use of citation- and arrest-driven enforcement methods.<sup>46</sup> In predominantly white spaces, the experience of being marginalized due to race, class, or other factors can result in a distinct form of punishment for many Black students. Scholars often refer to this phenomenon as “racial incongruity,” where the racial demographics of a particular setting lead to certain individuals being perceived as *out of place* and subject to distinct consequences.<sup>47</sup> This Article attends to the contextual forces of space that shape school police interactions with Black students in predominantly white schools.

#### B. POLICING, RACE, AND PLACE

The research reviewed up to this point concerns how school policing shapes and is profoundly shaped by neighborhood context. While most scholars have

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39. Joscha Legewie & Jeffrey Fagan, *Aggressive Policing and the Educational Performance of Minority Youth*, 84 AM. SOCIO. REV. 220, 232, 235 (2019).

40. See David S. Kirk & Robert J. Sampson, *Juvenile Arrest and Collateral Educational Damage in the Transition to Adulthood*, 86 SOCIO. EDUC. 36, 37 (2013).

41. Allen & Noguera, *supra* note 5, at 2.

42. See SHEDD, *supra* note 3, at 149; see also Sarah K. Bruch & Joe Soss, *Schooling as a Formative Political Experience: Authority Relations and the Education of Citizens*, 16 PERSPS. ON POL. 36, 43 (2018).

43. See Kristen Harper & Deborah Temkin Cahill, *Compared to Majority White Schools, Majority Black Schools Are More Likely to Have Security Staff*, CHILD TRENDS (Apr. 26, 2018), <https://www.childtrends.org/blog/compared-to-majority-white-schools-majority-black-schools-are-more-likely-to-have-security-staff> [https://perma.cc/J5US-P3P7].

44. Curran et al., *supra* note 25, at 37.

45. See *supra* notes 3–4 and accompanying text.

46. See generally George Lipsitz, *The Racialization of Space and the Spatialization of Race: Theorizing the Hidden Architecture of Landscape*, 26 LANDSCAPE J. 10 (2007) (theorizing the spatialization of race to document how the lived experience of space has a racial dimension).

47. Carbado, *supra* note 16, at 1492–93.

primarily focused on school policing predominantly in urban contexts—Black and Latinx neighborhoods—where school policing is concentrated and breeds unequal experiences for Black students,<sup>48</sup> few scholars have documented how police disproportionately interact with law-abiding marginalized groups in predominantly white communities.<sup>49</sup>

Law enforcement policies, practices, and norms interact with various social forces to determine victims of punitive mechanisms.<sup>50</sup> Racial attributes of people and neighborhoods can affect how police and residents perceive themselves relative to others.<sup>51</sup> More specifically, attributes of people and neighborhoods influence the psychological processes involved in policing such as categorization, stereotyping, expectancies, and decision-making.<sup>52</sup> Research points to various social policies and practices that increase policing of and disproportionately punish Black people in predominantly white neighborhoods.<sup>53</sup>

Aided by the mass media and popular culture, many Americans associate Black Americans with the urban ghetto, believed to be a place where “black people live” that symbolizes an impoverished, crime-prone, and violent area of any actual or proverbial city.<sup>54</sup> Ideas about the ghetto serve as a powerful source for stereotypes attributed to Black Americans, including being violent, dangerous or criminal, living in poverty, and other negative traits that deem Black Americans as subordinate to white people and non-Black others in white spaces.<sup>55</sup> In many cases, Black Americans are left to negotiate and perform or prove that these ghetto stereotypes do not apply to them.<sup>56</sup> Such categorization and stereotypes about Black Americans, particularly in white spaces, operate as a basis for surveillance and social control of Black bodies within the criminal justice system.<sup>57</sup> These biases also influence white neighbors’ expectations and subsequent decisions about how to prevent crime and protect their neighborhoods.<sup>58</sup>

48. See ALLEN ET AL., *supra* note 32; Allen & Noguera, *supra* note 5, at 6.

49. See, e.g., I. Bennett Capers, *Policing, Race, and Place*, 44 HARV. C.R.-C.L. L. REV. 43, 65–66, 68 (2009). More research is needed to explore the impact of policing interactions with students in these contexts.

50. See generally SPATIAL POLICING: THE INFLUENCE OF TIME, SPACE, AND GEOGRAPHY ON LAW ENFORCEMENT PRACTICES (Charles E. Crawford ed., 2010); STEVE HERBERT, POLICING SPACE: TERRITORIALITY AND THE LOS ANGELES POLICE DEPARTMENT (1997).

51. See Capers, *supra* note 49, at 60–72; Lipsitz, *supra* note 46, at 13–14.

52. See Devon W. Carbado, *(E)racing the Fourth Amendment*, 100 MICH. L. REV. 946, 977 (2002).

53. See Allen & Noguera, *supra* note 5, at 4, 5–6.

54. See Anderson, *supra* note 13, at 12.

55. *Id.* at 13; see JAMES D. UNNEVER & SHAUN L. GABBIDON, A THEORY OF AFRICAN AMERICAN OFFENDING: RACE, RACISM, AND CRIME 4 (2011) (documenting the “unique lived experiences” of Black people “not shared by whites or by other minorities”).

56. Anderson, *supra* note 13, at 13.

57. See *id.*; Capers, *supra* note 49, at 60–72.

58. See generally Maria R. Lowe, Luis A. Romero & Madeline Carrola, “*Racism Masked as Safety Concerns*”: *The Experiences of Residents of Color with Racialized Coveillance in a Predominantly White Neighborhood*, SOCIO. RACE & ETHNICITY, Aug. 9, 2023, at 1, 1 (documenting how racialized surveillance casts residents of color as “suspicious outsiders” in predominantly white neighborhoods).

An extensive body of literature documents the punitive features of policing, including its long history of reinforcing racial boundaries.<sup>59</sup> As sociologist Robert Sampson argues, police “are at the forefront of dividing up the city into easily understood categories shaped by race and class.”<sup>60</sup> Moreover, studies show that police officers navigate a myriad of decision-making processes regarding whom to patrol, whom to stop, and whom to arrest in accordance with their perceptions of the individuals they encounter.<sup>61</sup> Such practices create shared meanings about white neighborhoods and spaces, descendant from larger structural and historical conditions and the political economy of white space.<sup>62</sup> As Sampson shares, neighborhoods “gain their identity through an ongoing commentary between themselves and outsiders.”<sup>63</sup> As a result, existing research reveals how the high volume of policing interactions and outcomes for minor infractions are strongly correlated with race, poverty, and place—and are not reducible to differences in crime rates among various policed (and non-policed) populations.<sup>64</sup> The origin of racial disparities in school policing patterns can be similarly contextualized, particularly in predominantly white schools and neighborhoods.<sup>65</sup>

Scholars have documented several police encounters with Black Americans who are subject to racial incongruity because of their racial and ethnic identities and the suspicion these carry in predominantly white neighborhoods.<sup>66</sup> Police often surveil and punish those who seem out of place in white spaces, with traffic stops being a notable aspect of their work.<sup>67</sup> In certain instances, school police

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59. See, e.g., Monica C. Bell, *Located Institutions: Neighborhood Frames, Residential Preferences, and the Case of Policing*, 125 AM. J. SOCIO. 917, 934 (2020).

60. Robert J. Sampson, *When Things Aren't What They Seem: Context and Cognition in Appearance-Based Regulation*, 125 HARV. L. REV. F. 97, 101 (2012); see ROBERT J. SAMPSON, GREAT AMERICAN CITY: CHICAGO AND THE ENDURING NEIGHBORHOOD EFFECT 31 (2012) (pointing to the enduring process of neighborhood effects on policing throughout American cities, which “has been declared spatially liberated, [yet] remains place-based in much of its character”).

61. See FORREST STUART, DOWN, OUT, AND UNDER ARREST: POLICING AND EVERYDAY LIFE IN SKID ROW 82 (2016); RICHARD V. ERICSON, REPRODUCING ORDER: A STUDY OF POLICE PATROL WORK 202 (1982); Meghan Strohine, Geoffrey Alpert & Roger Dunham, *The Influence of “Working Rules” on Police Suspicion and Discretionary Decision Making*, 11 POLICE Q. 315, 318–19 (2008); Robert E. Worden, *Situational and Attitudinal Explanations of Police Behavior: A Theoretical Reappraisal and Empirical Assessment*, 23 LAW & SOC'Y REV. 667, 669 (1989).

62. See Anderson, *supra* note 13, at 13.

63. SAMPSON, *supra* note 60, at 54.

64. See Joe Soss & Vesla Weaver, *Police Are Our Government: Politics, Political Science, and the Policing of Race-Class Subjugated Communities*, 20 ANN. REV. POL. SCI. 565, 571–72 (2017).

65. See Weaver & Geller, *supra* note 33, at 190.

66. Capers, *supra* note 49, at 65–66; Carbado, *supra* note 52, at 955, 979–80 (noting the connection between racial incongruity and police encounters as a result of reasonable suspicion and probable cause standards).

67. See, e.g., Anderson, *supra* note 13, at 11–13; Jeannine Bell, *Can't We Be Your Neighbor? Trayvon Martin, George Zimmerman, and the Resistance to Blacks as Neighbors*, 95 B.U. L. REV. 851, 865–67 (2015) (focusing on suspicion of middle-class Black people in white neighborhoods); Bell, *supra* note 59, at 945–46; Angela Onwuachi-Willig, *Policing the Boundaries of Whiteness: The Tragedy of Being “Out of Place” from Emmett Till to Trayvon Martin*, 102 IOWA L. REV. 1113, 1119 (2017). This problem is not new. See, e.g., Carl Werthman & Irving Piliavin, *Gang Members and the Police*, in THE POLICE: SIX SOCIOLOGICAL ESSAYS 56, 78–79 (David J. Bordua ed., 1967) (“Being a Negro per se

officers are stopping parents and students in traffic stops. These stops can serve as the initial point of contact between students and school police officers—creating an environment of perpetual racial and spatial profiling both at the school site and in the surrounding neighborhood.<sup>68</sup>

Police officers in white neighborhoods and schools may associate Blackness with presumed danger, crime, and poverty.<sup>69</sup> White spaces force many Black people to negotiate their identities to mitigate the presence of this social belief or perception of them, which one scholar refers to as a “racial indeterminacy problem that ha[s] to be fixed.”<sup>70</sup> This negotiation leaves many Black people having to prove their innocence before being able to establish trust, credibility, and lawfulness with police.<sup>71</sup>

An inquiry into the critical features of school policing of Black students in predominantly white neighborhoods and schools also seeks to fully document the places where Black students are most affected by race and place. Because Black students have historically been the focus of school policing inequalities, we can expect them to be disproportionately subjected to high rates of arrests and citations throughout white spaces due, in part, to persistent racist logic and processes associated with racial incongruity. There are illustrative and genuine reasons to suspect that school policing has a unique impact on Black students with respect to race, racism, and the measured attributes of white spaces.

## II. MAPPING SCHOOL POLICING

In this Part, I provide background on the Los Angeles School Police Department and identify where school policing activities have been concentrated in and around Los Angeles Unified School District schools. Although Black students in predominantly Black and Latinx schools disproportionately bear the burden of negative police encounters in Los Angeles’s schools,<sup>72</sup> as I will show, Black students in predominantly white schools have higher rates of school police arrests and citations than their counterparts in predominantly Black and Latinx schools.

The spatial dimension of school policing offers critical context for understanding the context of police interactions with Black students in majority-white schools throughout Los Angeles County.<sup>73</sup> It also grounds the Article by establishing an important story about the relationship between race, place, and policing.

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(or being a Negro in a Negro neighborhood) is apparently not as important a criterion of suspiciousness as being a Negro who is ‘out of place.’”).

68. See generally Devon W. Carbado, *From Stopping Black People to Killing Black People: The Fourth Amendment Pathways to Police Violence*, 105 CALIF. L. REV. 125 (2017).

69. See Anderson, *supra* note 13, at 13.

70. Carbado, *supra* note 52, at 955.

71. Anderson, *supra* note 13, at 13.

72. See ALLEN ET AL., *supra* note 32.

73. I use Los Angeles County and LAUSD interchangeably throughout the Article, though I recognize other small districts exist within the county.

## A. THE LOS ANGELES SCHOOL POLICE DEPARTMENT

The Los Angeles School Police Department (LASPD) is one of the largest school police forces in the United States,<sup>74</sup> the fifth largest police department in Los Angeles County, and the fourteenth largest in the state of California.<sup>75</sup> In school districts like the Los Angeles Unified School District (LAUSD), school police officers are characterized as distinct from School Resource Officers (SROs) and school security guards.<sup>76</sup> This distinction likely reflects the school police officers' attachment to their designated police department and its standardized policy and governance.

In 2024, LASPD employs "211 sworn police officers, 25 non-sworn school safety officers (SSO), and 32 civilian support staff dedicated to serving"<sup>77</sup> the district's 1,302 schools and their surrounding communities.<sup>78</sup>

Previous research on LASPD shows that Black students comprised 25% of the total arrests and citations despite representing less than 9% of the student population.<sup>79</sup> Moreover, one in four of those arrested are elementary- or middle-school aged, and 76% of all school police involvement is against boys of color.<sup>80</sup> Several low-income Black communities and schools in Los Angeles are subject to the heaviest concentration of school police interactions.<sup>81</sup>

## B. SCHOOL POLICE DATA DESCRIPTION AND ANALYSIS

This Article's school police data come from arrest and citation records received from the Los Angeles School Police Department (LASPD) through a Public Records Act request.<sup>82</sup> The dates from the data received range from January 1, 2014, to December 31, 2017. This period marked the years that followed the School Climate Bill of Rights (SCBOR) policy changes regarding the role of school police officers that focused on handling serious safety issues instead of daily disciplinary interactions with students.<sup>83</sup> Since then, school police

74. Ariella Plachta, *Hundreds of Protesters March, Urge Cutting LAUSD School Police Department*, L.A. DAILY NEWS (June 17, 2020, 8:20 AM), <https://www.dailynews.com/2020/06/16/hundreds-of-protesters-march-urge-cutting-laUSD-school-police-department/> [<https://perma.cc/V4XW-8ZFM>].

75. *About Us*, L.A. SCH. POLICE DEP'T, <https://www.lausd.org/Page/15609> [<https://perma.cc/Y7ZH-3FVD>] (last visited Mar. 16, 2024).

76. See Allen & Noguera, *supra* note 5, at 1, 10 (describing when "an individual school or school district enters into a contract, or memorandum of understanding, with a local or county law enforcement agency to hire [school resource officers] temporarily or permanently to a K–12 campus [and when] a school district creates and runs its own independent police department and hires [school police officers] as employees of the district")

77. *About Us*, *supra* note 75.

78. E.g., Jennifer Snelling, *Total Turnaround: How LAUSD's Troubled Rollout Became a Model for Tech Success*, 2018 EMPOWERED LEARNER 19, 19.

79. Allen & Noguera, *supra* note 5, at 7 tbl.2.

80. ALLEN ET AL., *supra* note 32.

81. Allen & Noguera, *supra* note 5, at 5–6; see FREEMAN ET AL., *supra* note 3, at 29–32.

82. On April 22, 2019, the Los Angeles School Police Department received a California Public Records Act request. The data were received on July 19, 2019.

83. See L.A. UNIFIED SCH. DIST., SCHOOL CLIMATE BILL OF RIGHTS (2013), <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/416/School%20Climate%20Bill%20of%20Rights%20-%20Elementary.pdf> [<https://perma.cc/5QWS-JUP8>].

officers have been removed from being stationed on secondary school campuses as a result of continued racial inequalities and community calls to defund school policing.<sup>84</sup> However, recent policy has called for officers to return back to school campuses because of continued concerns over school safety stemming from mass threats and school shootings across the country.<sup>85</sup>

The school police data received in the Public Records Act request include three outcomes: (1) arrests, (2) citations, and (3) diversions. For each infraction, the data include age, sex, race/ethnicity, date of infraction, address of infraction, and whether the infraction occurred on campus.

To obtain information about the neighborhood where each infraction occurred, I linked the school police data by the infraction's zip code to the 2010 U.S. Census Bureau's zip code-level demographic data.<sup>86</sup> The zip codes were then matched to their corresponding neighborhoods.<sup>87</sup> These data were used to record descriptive statistics of the basic pattern of student arrests and citations.

To calculate the rates of arrests and citations, the school police data were combined with LAUSD enrollment data from 2014 to 2017.<sup>88</sup> All individual student infractions were disaggregated by age (student only);<sup>89</sup> sex (male or female); race/ethnicity ("White," "Black," "Latino," and "All other" students); year of arrest, citation, or diversion; off-campus (yes or no); and neighborhood.

I used a three-step process to map the total number of and rates of arrests and citations.<sup>90</sup> First, the school police data were geo-coded using ArcGIS software.<sup>91</sup> All school police data were matched to a school address using "location of arrest" or to the exact "location of arrest" for those school police records reported as "off-campus."

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84. Margaret Shuttleworth, *LA School Board Unanimously Votes to Remove Officers from Campuses, Approves Black Student Investment*, NBC L.A. (Feb. 17, 2021, 8:41 AM), <https://www.nbclosangeles.com/news/local/la-school-board-unanimously-votes-to-remove-officers-from-campuses-approves-black-student-investment/2528512/> [https://perma.cc/M4JX-66WT].

85. See Linh Tat, *LAUSD School Police Debate Renews After Texas Shooting*, L.A. DAILY NEWS (May 26, 2022, 10:44 AM), <https://www.dailynews.com/2022/05/25/laUSD-school-police-debate-renews-after-texas-shooting/> [https://perma.cc/T8C4-QSLX].

86. See *Download U.S. Census Data Tables & Mapping Files*, IPUMS: NAT'L HIST. GIS, <http://doi.org/10.18128/D050.V18.0> [https://perma.cc/5AKR-C9AR] (last visited Mar. 16, 2024); see also *Los Angeles County (South Central)–LA City (South Central/Watts) PUMA, CA*, CENSUS REP. (citing U.S. CENSUS BUREAU, AMERICAN COMMUNITY SURVEY 1-YEAR ESTIMATES (2022)), <http://censusreporter.org/profiles/79500US0603751-los-angeles-county-south-central-la-city-south-centralwatts-puma-ca/> [https://perma.cc/K2YV-7SQ4] (last visited Mar. 16, 2024).

87. *Mapping L.A. Neighborhoods*, L.A. TIMES, <http://maps.latimes.com/neighborhoods/> [https://perma.cc/9H9P-9P3W] (last visited Mar. 16, 2024).

88. It is important to recognize that the impact of school policing on a neighborhood cannot be judged solely by the rates of arrests and citations.

89. The "student only" category includes all reports for ages seventeen and under and reports listed as "on-campus" at an elementary, middle, or high school for eighteen-year-olds. An "on-campus" eighteen-year-old is therefore a current high school student, not a recent high school graduate.

90. Diversions were not included because of their relatively low numbers.

91. ArcGIS is a web- or cloud-based mapping and analysis program. *About ArcGIS*, ESRI: ARCGIS, <https://www.esri.com/en-us/arcgis/about-arcgis/overview> [https://perma.cc/BKS6-5ZB9] (last visited Mar. 16, 2024).



Second, I used geocoding to conduct a series of analyses examining the spatial distribution of LASPD involvement across neighborhoods in Los Angeles.<sup>92</sup> The goal was to identify “clusters” or the concentrations of all arrests and citations (school and non-school related) within neighborhoods.<sup>93</sup>

Finally, I overlaid the results with maps of Los Angeles’s neighborhoods to determine where the highest concentration of LASPD arrests and citations occurred. I identified neighborhoods with clusters across Los Angeles, as shown in [Figures 1 through 3](#). I connected these data to neighborhood characteristics data<sup>94</sup> to understand the neighborhood environments of communities where school police are concentrated, as reported in the Appendices.<sup>95</sup>

Discussion and analysis of the data in this Part focus on a larger structural problem embedded in school policing: the “spatialization of race”—how the demographic composition of white spaces that Black students inhabit determines the extent and degree of their differential treatment and disparate exposure to school policing practices.<sup>96</sup> The analyses of these data necessitated an approach that moved beyond singular notions of race, thus furthering our understanding of how gender, age, social class, and other demographic characteristics of students conflate to influence school policing experiences. More work is needed to determine how these results are likely to shape future policies and laws to reduce the racial harms of policing.

92. For instance, I used ArcGIS’s Choropleth tool to identify the percentage of school police involvement by neighborhood. See *Create and Use a Choropleth Map*, ESRI: ARCGIS INSIGHTS, <https://doc.arcgis.com/en/insights/latest/create/choropleth-maps.htm> [<https://perma.cc/NM37-XZ4Z>] (last visited Mar. 16, 2024).

93. I collaborated with a team of spatial experts to study where LASPD arrests and citations happen compared to other incidents. Using ArcGIS’s Kernel Density tool to map coverage area, we were able to determine the areas in Los Angeles where school police arrests and citations occur at various frequencies and concentrations. For further information about the Kernel Density tool and this formula, see *How Kernel Density Works*, ESRI: ARCGIS PRO, <https://pro.arcgis.com/en/pro-app/latest/tool-reference/spatial-analyst/how-kernel-density-works.htm> [<https://perma.cc/6WZV-NF44>] (last visited Mar. 16, 2024).

94. Using the *L.A. Times*’s “Mapping L.A. Neighborhoods,” I included additional demographic information: total population, race/ethnicity, median household income, and percentage of residents twenty-five and older with a high school diploma. *Mapping L.A. Neighborhoods*, *supra* note 87. See generally Elizabeth C. Delmelle, *The Increasing Sociospatial Fragmentation of Urban America*, 3 URB. SCI. (SPECIAL ISSUE), Jan. 11, 2019, at 1, 1 (discussing the concept of spatial distribution and clustering).

95. See Delmelle, *supra* note 94. I hypothesize that school policing is another cluster of features reflected in the concentrated disadvantage facing Los Angeles’s high-poverty Black neighborhoods. Prior research on large U.S. cities has shown that features of urban “concentrated disadvantage” tend to spatially cluster, such as the concentration of poverty, crime, unemployment, and incarceration. See WILLIAM JULIUS WILSON, *THE TRULY DISADVANTAGED: THE INNER CITY, THE UNDERCLASS, AND PUBLIC POLICY* 264 (1987); MASSEY & DENTON, *supra* note 34, at 75. All of these features, and a host of other disadvantages, are more prevalent in “high-poverty neighborhoods” with high population percentages of Black Americans.

96. See Lipsitz, *supra* note 46, at 12. On the other hand, the spatialization of race describes how the demographic composition of areas that Black students inhabit determines the extent and degree of differential treatment and disparate exposure to school policing policies and practices. *Id.*

## C. THE SPATIAL CONCENTRATION OF SCHOOL POLICING

Consistent with prior research, I found that Black students are over-represented in school arrests and citations in Los Angeles, just as they are in national data.<sup>97</sup> K–12 Black students are 7.19 times more likely than white students to be arrested and cited, and 12.2 times more likely than other students<sup>98</sup> to be arrested and cited.<sup>99</sup> Black students represented roughly 8% of the total student population in the district and Latino students represented 74%.<sup>100</sup> Black students were approximately 0.5 times more likely to be arrested and cited than Latinx students. The

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97. See ALLEN ET AL., *supra* note 32; Allen & Noguera, *supra* note 5, at 6.

98. These results can be replicated using Los Angeles's school police arrest and citation data from 2014 to 2017. For more information about the Public Records Act request, please see ALLEN ET AL., *supra* note 32. The category of "other" includes Indigenous American, Asian American, multiracial, and those students who reported no "race or ethnicity." While not the purpose of this Article, this categorization hides the impact of school policing on Indigenous American and Asian American students. Indigenous Americans, in particular, are often effectively invisible in police data due to misidentification, undercounting, and systemic forms of erasure. Nevertheless, research has consistently shown Indigenous American populations to be heavily targeted by policing and disproportionately represented in the justice system. See, e.g., Leah Wang, *The U.S. Criminal Justice System Disproportionately Hurts Native People: The Data, Visualized*, PRISON POL'Y INITIATIVE (Oct. 8, 2021), <https://www.prisonpolicy.org/blog/2021/10/08/indigenouspeoplesday/> [<https://perma.cc/98XA-YMJB>]. Indigenous Americans receive longer sentences and spend longer periods in prison. *Id.* Yet, relatively little research is done on these topics, in part because the data are so difficult to obtain. Furthermore, while these policing dynamics are clearer in Indian Country, in urban settings such as Los Angeles—home to the largest urban Indigenous population in the United States—the relative invisibility of the Indigenous population in general exacerbates the problems of misidentification and undercounting. Future research should pursue this work and gather testimonies from Indigenous community members, providing alternative perspectives to official police and criminal justice statistics. These alternative data forms will contribute significantly to increasing the visibility of Indigenous people in policing dynamics, especially in Los Angeles, and to our understanding of the lived experience of those dynamics for Indigenous people. Many Asian American and Pacific Islander (AAPI) communities historically have also been subject to discriminatory police practices, such as school policing. As a result, the incarcerated AAPI population has skyrocketed over the past two decades. See, e.g., Raymond Magsaysay, *Asian Americans and Pacific Islanders and the Prison Industrial Complex*, 26 MICH. J. RACE & L. 443, 453–54 (2021). Yet, police and carceral institutions often "lump" all AAPI identities under a single category without recording their ethnicity and sometimes categorizing them as "other." *Id.* at 453. This makes it difficult to discern which of the many and diverse AAPI communities are most highly impacted and overrepresented in police and carceral systems. Expanding research in this area will ensure a cross-section of AAPI identities from different ethnic backgrounds are heard and identified within the embattled history of school policing and mass incarceration more broadly. Documenting and analyzing police practices are important for understanding the experiences of those targeted, especially children and young adults, who are then swept into the juvenile and criminal justice systems along with their communities.

99. I conducted basic descriptive statistics for all school police records of arrested and cited students from 2014 to 2017. These data are represented by race/ethnicity as reported by LASPD. I estimate a single logistic regression model using an odds ratio. This model examines the contemporaneous association between student race/ethnicity and school police involvement (for example, arrest and citation). I report only the odds ratio, which indicates how much more likely a student is to be arrested and cited according to their race/ethnicity compared to their counterparts. My previous work documents that Black youth comprised 25% of the total youth arrests and citations, despite representing less than 9% of the student population. Allen & Noguera, *supra* note 5, at 7 tbl.2.

100. See *infra* Table 1. Comparing the school district's student population to Los Angeles County, Black students represented 7% of the total student population in the county and Latino students represented 58%. *Child Population, by Race/Ethnicity*, KIDS DATA, <https://www.kidsdata.org/topic/33/>

odds ratios suggest that Black students have the highest risk of being arrested and cited in the county compared to every other race and ethnic student population.<sup>101</sup>

One of the most alarming quantitative findings was the overrepresentation of arrests and citations by race and ethnicity within LAUSD. Black students only make up 8.45% of the student population in the LAUSD, yet they represent approximately 25% of the students arrested and cited. Latino students were slightly underrepresented in arrests and citations, and white and other students were more notably underrepresented. Again, findings for the Black students were the starkest given that they were the most overrepresented ethnicity by about 15%.

**TABLE 1. RACE/ETHNICITY BREAKDOWN FOR LOS ANGELES SCHOOL POLICE ARREST AND CITATIONS BY STUDENT POPULATION: 2014–2017**

	Population of Students Arrested and Cited by LAUSD	Population in LAUSD
Black	24.58%	8.45%
Latino	70.36%	73.85%
Other	2.18%	10%
White	2.87%	7.7%

To understand Black students’ circumstances borne out of the white space, I offer maps of the basic spatial pattern and distribution of school policing in Los Angeles. This Section begins by documenting patterns of policing at schools in South Central Los Angeles—a low-income community comprised largely of Latino and Black residents. Black students are disproportionately arrested and cited in South Central, and arrest and citation rates there are substantially higher than in other parts of the county.

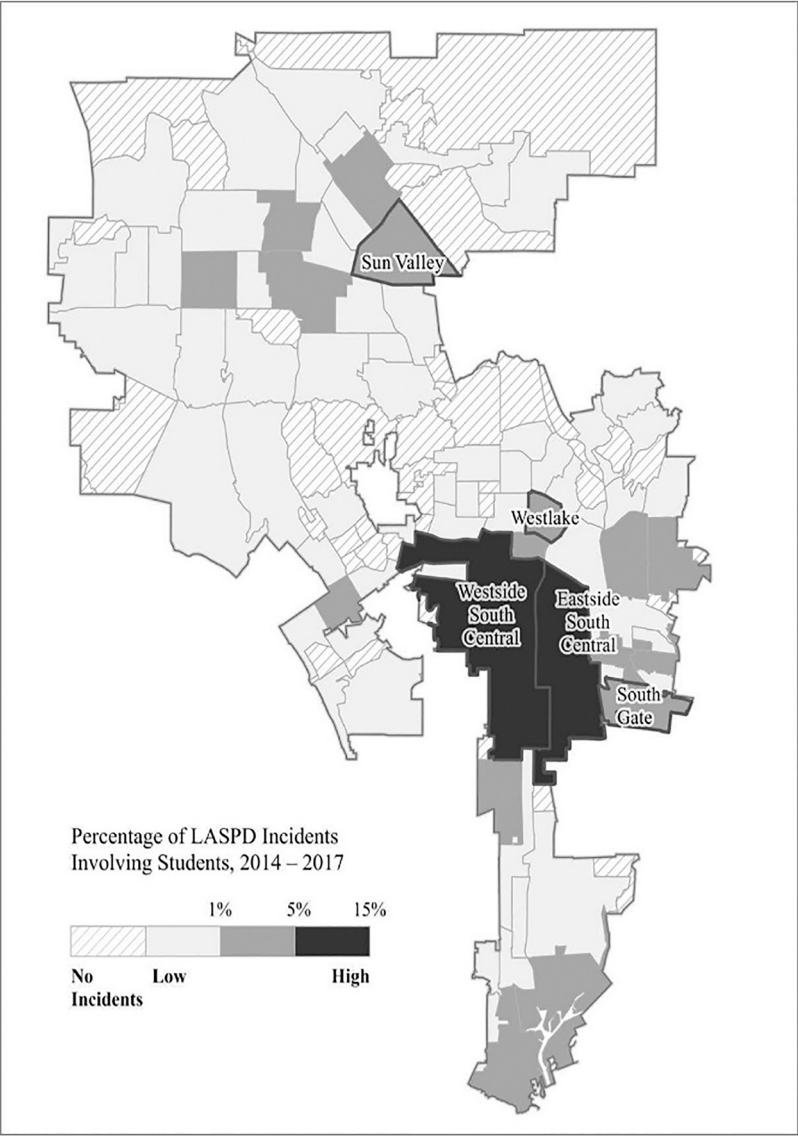
Figure 1 is a map of concentrated school policing in Los Angeles; poor and racially segregated Black and/or Latino neighborhoods, namely Westlake and South Central, bear the brunt of arrests and citations issued by school police.<sup>102</sup>

child-population-race/table#fmt=144&loc=364&tf=110&ch=7,11,70,10,72,9,73&sortColumnId=0&sortType=asc [https://perma.cc/83Y6-SW6U] (last visited Mar. 16, 2024).

101. A large body of research has shown that labeling and exclusion practices can create a self-fulfilling prophecy that results in a cycle of antisocial behavior which can be difficult to break. As Black students get older, the rule violations perpetrated by such students often increase in frequency and severity, resulting in a steady escalation in the punishments that are applied. For many, the cycle of punishment eventually leads to entanglement with law enforcement and the criminal justice system. *See, e.g.,* RONNIE CASELLA, “BEING DOWN”: CHALLENGING VIOLENCE IN URBAN SCHOOLS 78 (2001); DENISE C. GOTTFREDSON, SCHOOLS AND DELINQUENCY 42–43 (2001).

102. *See* Allen & Noguera, *supra* note 5, at 6.

**Figure 1. Spatial Concentration of Arrested and Cited Students by Student Population, by Neighborhood: 2014–2017**



**Figure 2. Spatial Concentration of Arrested and Cited Black Male and Female Students by Student Population, by Neighborhood: 2014–2017**

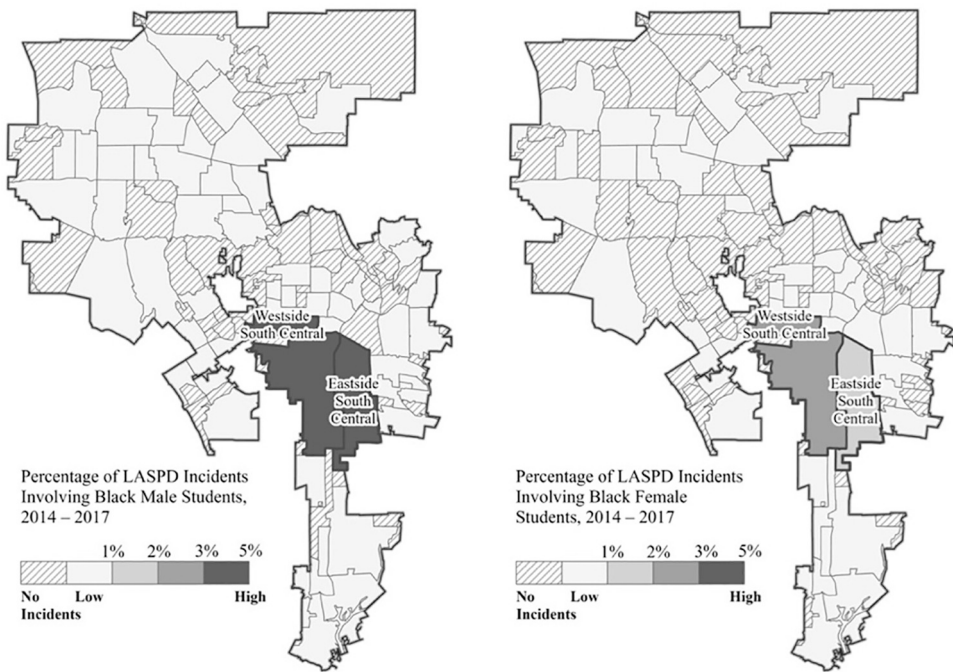


Figure 2 is a map of the same school police interactions broken down by gender of Black students in Los Angeles’s neighborhoods.

Whereas school policing for all arrested and cited Black students is concentrated in poor and racially segregated Black and Latino neighborhoods in Los Angeles County,<sup>103</sup> the disproportionate rates of arrested and cited Black male and female students are far worse in white spaces—predominantly wealthy white neighborhoods and schools in Los Angeles.<sup>104</sup>

103. See *id.*

104. See *infra* Figure 3. As political scientist and philosopher Elizabeth Anderson explains, racial segregation “marks off ‘black’ from ‘white’ neighborhoods” and thereby “provides the occasion for generalized suspicion of the presence of blacks in the ‘wrong’ neighborhood.” ANDERSON, *supra* note 34, at 42. According to Anderson, “[s]uch racial profiling could not occur in integrated neighborhoods.” *Id.* However, legal scholar Monica Bell counters by writing, “While it likely *could* still occur, if police officers and departments exercise their own discretion and foreground promotion of desegregation in their policies and practices, it would be significantly less likely.” Monica C. Bell, *Anti-Segregation Policing*, 95 N.Y.U. L. REV. 650, 701 (2020).

As with many “white spaces,” the population of Black students in these districts is relatively small, and care should be taken when discussing rates per 100 students. Take, for example, the nine Black boys in Pacific Palisades who were collectively arrested eleven times. See *infra* Appendix A. This 122% arrest rate is qualitatively different from the 34% arrest rate for Black boys in Mar Vista, where there were thirty-seven arrests of Black boys over the same time. See *id.*

As described in [Appendix A](#), the highest rates of arrested and cited Black boys are found in neighborhoods where the total white population ranges from as low as 51.3% (Mar Vista, 90066) to as high as 88.6% (Pacific Palisades, 90272), except for one neighborhood that is predominantly Latinx at 92.6% (Vernon, 90058). For Black female students, as reported in [Appendix B](#), the story is the same. For instance, the highest rates of arrested and cited Black girls are found in neighborhoods where the total white population ranges as high as 88.6% (Pacific Palisades, 90272).<sup>105</sup> Connected to these neighborhoods that exhibit the highest rates of arrested and cited Black male and female students are several important demographic features, as reported in [Appendix C](#).<sup>106</sup> These features include high percentages of residents twenty-five and older with four-year degrees and high median household incomes.

Building on previous scholarship,<sup>107</sup> I argue that one of the basic strategies of school policing is managing space. This includes surveilling students within physical communities of color and within communities and schools that are predominantly white: white space. In both spaces, police target students who seem out of place. Jeffrey Fagan and Elliott Ash's spatial research documents how this form of police surveillance makes particular populations "stuck in place."<sup>108</sup> That is, policing in non-white, low-income neighborhoods keeps poor people of color poor, thereby locking them into already disadvantaged

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Some argue that these statistics show that Black students are disproportionately arrested and cited. Others wonder if, although all students in the district are overpoliced, Black students face a disproportionate risk of police interaction. While there is room to debate whether the risk of police interactions is unique to Black students or whether overpolicing harms all students in the LAUSD, I interpret these statistics to show: (1) Black students are arrested and cited in majority-white spaces at a greater proportion than their racial counterparts in more racially diverse areas, and (2) Black students are arrested and cited in racially diverse areas at a greater proportion than their racial counterparts. In simple terms, Black students are indeed singled out for arrests and citations regardless of where they go to school.

Legal scholars have documented the importance of studying policing in majority-white spaces, revealing the importance of how racial incongruity shapes "how we police but also sends the expressive message from a representative of the state about who belongs and who does not." Capers, *supra* note 49, at 46 (footnote omitted). This Article builds on this work and argues that more care should be given to the unique policing experiences faced by Black students in these settings. Future research also should assess how the inter-spatial differences of school police officer presence shape the experiences of Black students within predominantly white spaces. My hope is that this Article encourages scholars to continue this work. The disproportionate, unique impact of school policing on Black boys in predominantly white schools alongside the stark disparities that already exist throughout the city in predominantly Black and Latinx schools provide a full accounting of the stakes of reform that is needed in Los Angeles.

105. The one exception is the total white population being as low as 2.1% (Vernon, 90058).

106. The spatial concentration of school policing in Los Angeles plays out over larger regions (that is, white flight to suburbs, differences across counties/school districts, etc.). In other words, the focus on a single district in this Article is only one of many examples of these dynamics, making school policing an important area of future research.

107. See Jeffrey Fagan & Elliott Ash, *New Policing, New Segregation: From Ferguson to New York*, 106 GEO. L.J. ONLINE 33, 34 (2017).

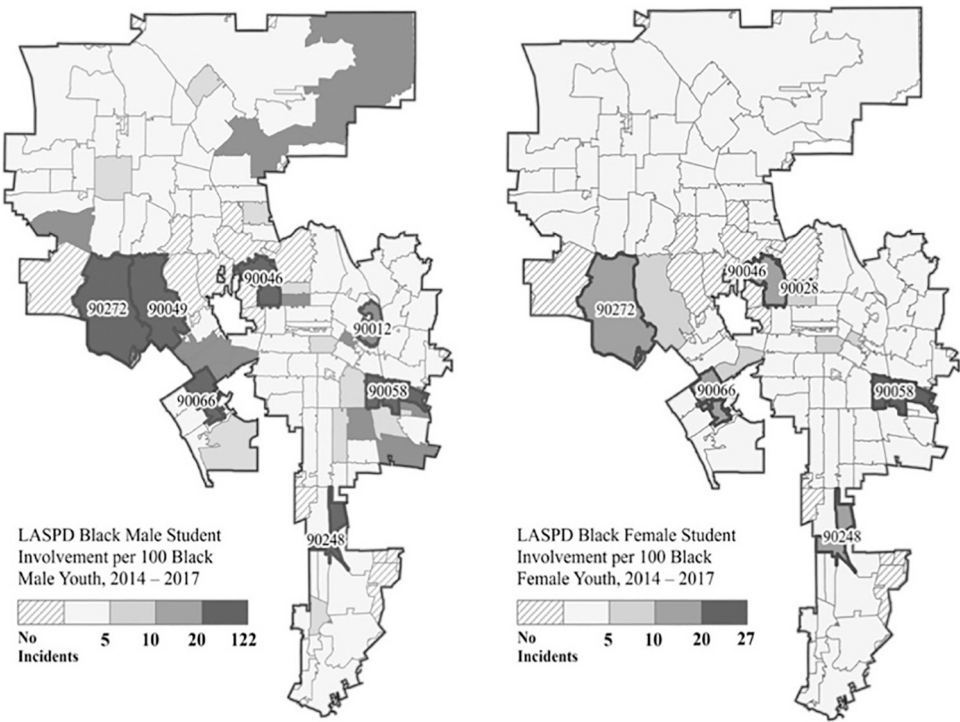
108. *Id.* at 133–34; see generally PATRICK SHARKEY, *STUCK IN PLACE: URBAN NEIGHBORHOODS AND THE END OF PROGRESS TOWARD RACIAL EQUALITY* (2013) (noting that the majority of Black children living in the country's poorest and most segregated neighborhoods come from families that have been living in similarly impoverished areas for at least two generations).



neighborhoods. This form of “New Policing”<sup>109</sup> exacerbates preexisting disadvantages by subjecting people to a cycle of policing and criminalization.

In the case of Black students in white spaces, I argue that the over-policing and consequent hyper-criminalization of Black students in majority-white schools and neighborhoods are fueled by racialized stereotypes and prejudices that shape how officers view and treat Black students, considering them to be lower-class, academically underprepared, and deserving of punishment. As documented in the next Part, police engage in particularly harsher treatment of Black students in majority-white schools compared to majority-Black and Latino schools.<sup>110</sup>

**Figure 3. Spatial Concentration of Arrested and Cited Black Male and Female Students, Rates Per 100 Black Male and Female Youth, by Zip Code: 2014–2017**



109. Defined as geographically concentrated, intensive, prevention-focused policing. See Fagan & Ash, *supra* note 107, at 35–37.

110. See Rod K. Brunson & Ronald Weitzer, *Police Relations with Black and White Youths in Different Urban Neighborhoods*, 44 URB. AFFS. REV. 858, 864–65 (2009); see, e.g., VICTOR M. RIOS, *PUNISHED: POLICING THE LIVES OF BLACK AND LATINO BOYS* 155–56 (2011) (providing a poignant example of the harsh policing Black students are subjected to in majority-Black schools).

### III. POLICING MINOR INFRACTIONS

In this Part, I focus on the charges associated with school police arrests or citations and interview data gathered from ninety-five Black high school students attending predominantly white schools with a police presence.<sup>111</sup> I address the following two questions in this Part: What are the common charges faced by arrested or cited Black students in predominantly white schools? What are Black students' experiences with school policing practices in these schools? The empirical data show that Black students in predominantly white schools are more likely to be cited and arrested for public disturbance than any other racial and ethnic student group; they are also more likely to be cited and arrested for public disturbance than for committing violence or causing harm.

#### A. CHARGE CODE ANALYSIS

This Article's school police charge data come from the same arrest and citation records distributed by the LASPD discussed in Part II. Each arrest or citation made in Los Angeles from 2014 to 2017 was linked to LASPD's official charge code list.<sup>112</sup> This list reported the charge code number, charge description, and crime classification used for all student-police interactions from 2014 to 2017.

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111. The question of how to assess the quality of qualitative research is paramount. How do we know good qualitative research when we see it? How can we tell when it isn't? Recent work outlines a set of five standards or principles: the attempt to get a thick description of people's lives (cognitive empathy), forms of variation within the case that are not just consistent with their priors or extant theory (heterogeneity), researchers' ability to follow up on the data they uncovered (follow-up), the "show, don't tell" quality of the data in the interviewee's own words (palpability), and authors' careful attention to their positionality (self-awareness). *See generally* MARIO LUIS SMALL & JESSICA MCCRORY CALARCO, *QUALITATIVE LITERACY: A GUIDE TO EVALUATING ETHNOGRAPHIC AND INTERVIEW RESEARCH* (2022). Rather than gravitating towards quantitative standards and attempting to make qualitative research as close as possible to quantitative reasoning, one of my goals is to apply these guiding principles to my own in-depth interviews. This is done not to set a standard for empirically sound qualitative research but to show how qualitative research standards are both rigorous and quite different from quantitative standards.

112. The LASPD's Chief of Police provided the official list of charge codes via email related to student arrests. This list was not intended for public dissemination. A copy can be obtained by contacting LASPD or submitting a Public Records Act request for this information. The charge code list was used in the Article's final charge analysis for both arrests and citations. To find the most common charges, I grouped similar variations into charge categories.

For example, all battery charge categories were combined (e.g., PC242, PC243(A), PC243(B), PC243(C), PC243(D), PC243(E)(1), PC243.2(A), PC243.4(A), PC243.5(A)(1), PC243.6-F, and PC243.8(A)). Another example includes combining all "disturbing the peace" charges into one "public order" charge category (e.g., PC626.7(A), PC626.8(A)(1), PC626.8(A)(2), PC626.8(A)(3), PC405(A), PC415(2), PC415(3), PC415.1, PC415.5(A)(1), and PC415.5(A)(2)). This analysis was informed by previous literature that details the history of public order charges to include activities such as loud noise, offensive words in public places, interfering or surprising school activities, disorderly conduct and fighting, gambling, graffiti, vandalism, and trespassing and loitering. *See* LOUIS COHEN, LAWRENCE MANION & KEITH MORRISON, *RESEARCH METHODS IN EDUCATION* 148–55 (6th ed. 2007); W. James Potter & Deborah Levine-Donnerstein, *Rethinking Validity and Reliability in Content Analysis*, 27 J. APPLIED COMMUN. RSCH. 258, 266–73 (1999).

## B. STUDENT INTERVIEW DATA DESCRIPTION

I conducted a total of ninety-five in-depth oral history interviews with Black high school students to explore how their experiences with school policing in predominantly white neighborhoods are influenced by the interaction of race and place.<sup>113</sup> The final interview sample included fifty-three females (56%) and forty-two males (44%). Forty-eight students (51%) were rising high school seniors, and the remaining forty-seven (49%) were rising juniors. Table 2 below details the student composition. I used two sampling techniques. First, I used a purposeful “snowball sampling” technique to recruit a high number of Black high school students. This technique involved finding and recruiting participants through referrals.<sup>114</sup> Second, I pursued a longstanding technique, “sampling for range,”<sup>115</sup> to identify sub-categories of Black students according to

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113. One of the benefits and beauties of qualitative research is that “the researcher not only collects but also *produces* the data, such that the data collector is explicitly in the data themselves.” SMALL & CALARCO, *supra* note 111, at 12. In this way, these interactions provide intimate revelations of everyday experiences and new knowledge that push researchers beyond their own often limited experiences.

114. See ROBERT S. WEISS, *LEARNING FROM STRANGERS: THE ART AND METHOD OF QUALITATIVE INTERVIEW STUDIES* 22–23 (1994). One of the consequences of snowballing, especially when the number of participants (*n*) is small (which is not the case in my study), is that the final interviewees are more likely to know one another than would be the case had they been selected at random. Thus, some scholars argue that the final sample is more likely to constitute a social network. For this reason, scholars suggest following the precepts of classical statistics (for example, random sampling) to reduce the level of bias. Other scholars, on the other hand, believe this view is mistaken for two reasons. See Mario Luis Small, ‘How Many Cases Do I Need?’: *On Science and the Logic of Case Selection in Field-Based Research*, 10 *ETHNOGRAPHY* 5, 14–15 (2009). The first mistake is caused by in-network selection and response:

What proponents of the random selection approach to small-*n*-in-depth interviewing rarely mention is that many people who are cold-called will not agree to long, in-depth interviews on personal topics with a stranger. This often buried detail – how many people refused, hung up, or were not home? – is critical.

*Id.* at 14. The second mistake is caused by mislabeling:

What an in-depth interviewer . . . faces is . . . a set of cases with particular characteristics that, rather than being “controlled away”, should be understood, developed, and incorporated into her understanding of the cases at hand . . . . By inaccurately labeling “representative” the strategy . . . we erroneously assume that the others are “biased.”

*Id.* One solution that may benefit in-depth researchers is not calling their interviewees a sample of *n* = X, but, instead, a set of X cases, because trying to make it representative will be challenging unless the set of cases is large. *Id.* at 15.

115. Sampling for range enables a researcher to gather a sample that maximizes her ability to examine the specific issue she’s studying. Mario Luis Small, *Lost in Translation: How Not to Make Qualitative Research More Scientific*, in *WORKSHOP ON INTERDISCIPLINARY STANDARDS FOR SYSTEMATIC QUALITATIVE RESEARCH* 165, 167 (Michèle Lamont & Patricia White eds., 2005), [https://scholar.harvard.edu/files/lamont/files/issqr\\_workshop\\_rpt.pdf](https://scholar.harvard.edu/files/lamont/files/issqr_workshop_rpt.pdf) [<https://perma.cc/MX37-YZGE>].

The natural question is whether, having acknowledged this, it is still not better for Jane to have picked her respondents “at random” (in quotation marks because her final sample is not statistically random due to high non-response) than engaging in some other non-random selection strategy. Not always. Consider, for example, sampling for range. Suppose Jane suspected strongly that gay and lesbian respondents would be more sympathetic to immigrants. Even a truly random sample would have yielded, at best, 3 or 4 gay or lesbian respondents

gender, high school grade level, first-generation status, social class, and school police experiences, to name a few. Ninety-five Black students were selected for this study<sup>116</sup> because they self-identified or were recommended by program staff or peers from one of the participating social-justice, community-based organizations in Los Angeles.<sup>117</sup> A particular focus was placed on Black students who attended predominantly white schools in predominantly white neighborhoods in Los Angeles.

TABLE 2.SUMMARY OF STUDENT CHARACTERISTICS

Total Students	Gender Breakdown (and per- cent of total students)	High School Grade Level (and percent of total students)	Number of Primary Schools Attended by Students	First- Generation Status (and percent of total students)	Number of Neighborhoods Resided in by Students
95	53 females (56%) 42 males (44%)	48 Juniors (51%) 47 Seniors (49%)	7	57 (60%)	15

All ninety-five interviews were conducted in person and lasted approximately two hours. These interviews were collected as part of a larger research project on Black and Latinx residents and their experiences with policing and incarceration in Los Angeles. I created a semi-structured interview protocol to help guide the discussion of all interviews. This process included asking students a set of guided general questions about their experiences living and attending schools in predominantly white neighborhoods but allowed for related dialogue as questions and topics emerged. This semi-structured approach allowed students to set parameters and voice their experiences and associated meanings.

out of 35, of which 1 or 2, at best, would reveal this to her. This would leave her no room to examine this question. In these circumstances, Jane would be better served designing her study to include a large, pre-determined number of gay and lesbian respondents, even if this meant finding them through non-random means, such as organizations. For many questions of interest to interview-based sociologists, sampling for range is a more effective strategy.

*Id.* (citations omitted).

116. In in-depth interview studies, the number of cases or sample size is unknown until the study is completed.

117. The two social justice community-based organizations in Los Angeles were the Vice-Provost’s Initiative for Pre-College Scholars Program (VIPS) and Youth Justice Coalition (YJC). VIPS is a university-based, pre-college access program designed to support and help predominantly Black students become competitively eligible for selective universities. *See VIP Scholars*, UCLA UNDERGRADUATE EDUC., <https://www.aap.ucla.edu/units/vip-scholars/> [<https://perma.cc/AKZ7-U8FN>] (last visited Mar. 16, 2024). The YJC is a nonprofit organization that provides a range of social justice programming to historically marginalized and underrepresented youth populations. *See Mission and History*, YOUTH JUST. COAL., <https://youthjusticela.org/history/> [<https://perma.cc/8JJE-2ZP9>] (last visited Mar. 16, 2024).

## C. STUDENT INTERVIEW DATA ANALYSIS

I used a multistep thematic analysis to analyze the student interview data.<sup>118</sup> First, I read all interview transcripts in their entirety and engaged with an open coding process to identify specific themes, patterns, and individual quotations from the interview. Through this process, I determined the key findings related to this Article's broader research question: how race and space interact to influence Black students' experiences with school policing in predominantly white neighborhoods.

I began the coding process by creating a coding dictionary informed by previous literature and theories of punishment.<sup>119</sup> I then organized the themes and patterns from the open coding process and organized the specific interview quotations based on the following domains: (a) Black students' indirect and direct experiences with school police; (b) Black students' perceptions of school policing; (c) Black students' responses to school police interactions; and (d) Black students' proposed solutions to school policing in predominantly white schools. These domains served as critical and salient themes for the present study.

Next, eight research assistants and I read through all ninety-five interview transcripts in their entirety, applying the codes and suggesting modifications to the coding dictionary. To ensure inter-reader reliability, we each wrote and reviewed several research memos to justify the codes for the excerpted student interviews. In the final stage, I carefully selected the interview transcripts that addressed the study's focus on race, place, and school policing—irrespective of whether students experienced positive or negative experiences with policing.

I established the trustworthiness and validity of the interview data in four different ways: (a) triangulation; (b) extended field engagement during interviews; (c) constantly searching for disconfirming evidence in each interview; and (d) participant checking.

Data triangulation is a process that uses multiple viewpoints to study and explain the complexity of conclusions reached from students' experiences and responses to school policing in a more detailed and balanced way.<sup>120</sup> Data triangulation is also an important means of cross-checking data from different sources.<sup>121</sup> We engaged in this continual comparison process, or what researchers refer to as the "constant comparative method."<sup>122</sup> Specifically, we checked all interviews against interview notes, notes against interview observations, observations against primary sources, and so forth. This method repeated itself until redundancy was reduced and the data represented their appropriate domains and

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118. See *supra* note 111.

119. See discussion *supra* Part I.

120. COHEN ET AL., *supra* note 112, at 141–43.

121. John W. Creswell & Dana L. Miller, *Determining Validity in Qualitative Inquiry*, 39 THEORY INTO PRACTICE 124, 126–27 (2000).

122. BARNEY G. GLASER & ANSELM L. STRAUSS, *THE DISCOVERY OF GROUNDED THEORY: STRATEGIES FOR QUALITATIVE RESEARCH* 101–15 (reprint 2006).

themes.<sup>123</sup> Using multiple data sources helped to prevent confirmation bias or making false inferences without questioning and complementing information derived from each data source with information from other sources.

Second, I spent several hours in and around schools and neighborhoods throughout South Central Los Angeles to generate and confirm, or disconfirm, emerging hypotheses. I also spoke to LASPD's leadership, families who were actively involved in the two community-based organizations responsible for recruiting all student study participants, and the organizations' staff members. Interviewing and observing students over two interview sessions and conducting follow-ups over the course of several weeks or months (if necessary) strengthened the validity of the study in two ways. First, students were unlikely to uphold any fabricated constructions of their actual experiences and responses to school policing if interviewed and observed on multiple occasions.<sup>124</sup> Furthermore, because interviews occurred in one of two community-based organizations that students were actively involved in, they were likely extending their "discursive penetration"—knowledge of the social systems that individuals already participate in, which varies from person to person.<sup>125</sup>

Third, I ensured the validity of my qualitative findings by searching for disconfirming evidence,<sup>126</sup> which was informed by my final approach of participant checking. During the coding phases of my study, I generated descriptive hypotheses and then actively sought evidence to disprove them. For example, first-session interviews suggested that a bulk of students did not have any contact with school police in their neighborhoods or schools. I searched for evidence throughout the students' interviews that would disprove this hypothesis, initially finding none. However, over time, it became clear that in certain informal and indirect circumstances, students did have contact with school police that may not have led to formal infractions such as citations or arrests but significantly influenced their experiences and responses to school policing.

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123. See, e.g., Kathy Charmaz, *'Discovering' Chronic Illness: Using Grounded Theory*, 30 SOC. SCI. & MED. 1161, 1162 (1990); Gery W. Ryan & H. Russell Bernard, *Techniques to Identify Themes*, 15 FIELD METHODS 85, 88–89, 91 (2003).

124. See HOWARD S. BECKER, *SOCIOLOGICAL WORK: METHOD AND SUBSTANCE* 54 (1970) ("[M]ultiple observations convince us that our conclusion is not base[d] on some momentary or fleeting expression of the people we study, subject to ephemeral and unusual circumstances.").

125. ANTHONY GIDDENS, *CENTRAL PROBLEMS IN SOCIAL THEORY: ACTION, STRUCTURE AND CONTRADICTION IN SOCIAL ANALYSIS* 5–6 (1979).

126. To determine that an analysis is valid, researchers

contrast[ ] "statistical inference" from . . . "logical", "causal", or (more impishly) "scientific inference". The former is "the process by which the analyst draws conclusions about the existence of two or more characteristics in some wider population from some sample of that population . . ."; the latter, "the process by which the analyst draws conclusions about the essential linkage between two or more characteristics in terms of some explanatory schema". Most quantitative research . . . employs both types of inference; case study [and in-depth interview] methods can only employ the latter: "inference . . . cannot be statistical and . . . extrapolability from any one case study to like situations in general is based only on logical inference."

Small, *supra* note 114, at 22 (citations omitted) (quoting J. C. Mitchell, *Case and Situation Analysis*, 31 SOCIO. REV. 187, 199–200 (1983)).



The final approach to establishing trustworthiness and validity involved participant checking within and across interviews. This process involved me asking many students about the accuracy of my understanding about Black students' experiences and responses to school policing. I also returned to each community-based organization and their associated school sites (if any) after data collection and throughout several phases of data analysis to share my larger interview themes with students, staff, and community members. This process also involved asking about ways in which my understanding of the data might be incorrect. Participant checking served as a methodological approach of requesting disconfirming evidence. Throughout the data analysis process, I conducted a thorough search for disconfirming evidence by carefully examining each interview recording, transcript, and field note for any data that would cause me to ignore or improve my qualitative conclusions (and their connections to the primary source data about school policing disparities).<sup>127</sup> In this sense, I constantly refined the themes, concepts, and organizational arrangements I present in the findings.<sup>128</sup>

#### D. LIMITATIONS

A primary limitation of the interview data is that they are simply based on students' reports of their own school police interactions. These ninety-five reports are not necessarily meant to be generalizable, but the data still aspire to have some relevance beyond just the specifics of a given study.<sup>129</sup>

These reports, however, could be influenced by an array of factors, including students' previous exposure to police, school climate, the relationship between where students reside and where they attend school, and a host of associated neighborhood conditions. Therefore, the study's results "identif[y], and confirm[] beyond reasonable empirical doubt, . . . important mechanism[s] affecting" school policing more broadly.<sup>130</sup> In doing so, they suggest potential variation in police-student interactions, some of which may appear contradictory. A goal of qualitative research is to provide the contradictions that participants share in their responses to interview questions. This is especially the case here given that the study's large interview sample is heavily influenced by context and circumstance. In any case, the selected methodology utilized in this study has heuristic value in documenting how Black students experience school policing in predominantly white schools.

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127. It is important to note that the methodology conducted here is common for qualitative analysis and does not suggest that the statements made by the students were altered in any way: the students' statements are direct quotations from the student interviews. Participant checking is used to ensure the sample statements are representative across all viewpoints and experiences of policing in schools. There are what appear to be conflicting responses with respect to police, which is encouraged by this methodology—a process known as gathering a “fully loaded cost accounting” of a particular topic. See NELL IRVIN PAINTER, *SOUTHERN HISTORY ACROSS THE COLOR LINE* 15–16 (2002).

128. There were many other stories collected which are not documented in this study but deserve to be heard. It is my hope to share these stories in other venues.

129. One of the goals is to ensure that the researcher is listening to the voices of all participants in order to draw descriptive inferences and reliable conclusions. Small, *supra* note 114, at 10–13.

130. *See id.* at 26. Small suggests “this approach may be used to think about in-depth interview research.” *Id.*

## E. UNDERSTANDING THE REASONS FOR POLICING BLACK STUDENTS

As described, Black students in predominantly white schools experience higher rates of negative police encounters than their counterparts in predominantly Black and Latino schools. No other racial or ethnic student population came closer to enduring the disproportionately high rates of arrest and disciplinary infractions in these white spaces.

In Los Angeles's predominantly white schools, Black students were more likely to be arrested.<sup>131</sup> In these white spaces, LASPD data shows that arrests accounted for slightly less than half, or 43%, of Black students' total involvement with school police. Arrests and citations represented the majority of school police involvement for both Black male and female students in white spaces, 80% and 71%, respectively.

Whereas popular discourse on school policing contends that serious crime in predominantly white schools begets higher numbers of arrests and citations in those areas,<sup>132</sup> the most common charges brought against Black students—public order, or public disturbance, charges—encompassed interfering with school activities, reentering school after being asked to leave, and the use of offensive language.<sup>133</sup> In other words, consistent with decades of research on school discipline disparities between Black and white students—such as school suspensions and expulsions<sup>134</sup>—the majority of Black students are being arrested and cited for minor offenses such as classroom disruption, not for committing violent crimes or causing serious physical harm.<sup>135</sup>

Public order charges accounted for 84% of all school police involvement for Black female students and 47% for Black male students in white spaces alone.<sup>136</sup> For Black male students, no other charge category accounted for more than 15%

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131. See *infra* Appendices A, B, C.

132. See, e.g., Perry L. Moriearty & William Carson, *Cognitive Warfare and Young Black Males in America*, 15 J. GENDER RACE & JUST. 281, 283–84 (2012).

133. Examples include loud noises, offensive words in public places, interfering or surprising school activities, disorderly conduct/fighting, gambling, graffiti, vandalism, and trespassing/loitering. See *supra* note 112. These inequalities are not explained away by students' behavior or offense rates. Even if this were the case, sociologist Pedro Noguera reminds us that:

Schooling is based upon an informal social contract between student and school: in exchange for an education students are expected to obey school rules. Not surprisingly, the students most likely to engage in violent or disruptive behavior are usually those for whom the contract is not working – the ones most disconnected from learning. Unless efforts are taken to help students to see how their personal goals and aspirations can be fulfilled through education, and good behavior in school, the problem will not go away, even if the most disruptive students are removed.

Noguera, *supra* note 1.

134. See, e.g., Richard O. Welsh & Shafiqua Little, *The School Discipline Dilemma: A Comprehensive Review of Disparities and Alternative Approaches*, 88 REV. EDUC. RSCH. 752, 753 (2018).

135. Some believe that students should not be arrested or cited for minor offenses. My future work will examine whether minor offenses are worthy of arrest or citation. Legal scholars have been more alert to the role of disorderly conduct in the Fourth Amendment context. I build on their important work. See Jamelia N. Morgan, *Policing Marginality in Public Space*, 81 OHIO ST. L.J. 1045, 1061 (2020).

136. The number of public order charges faced by Black students increases when examining Los Angeles in its entirety. But the brunt of these charges occurs in white spaces. A total of 41 public order charges were assessed to Black female students and 50 to Black male students in white spaces.

of all Black male school police involvement (the second most common charge category was possession of weapons or fireworks). The second highest charge category for Black female students represented just 6% of all Black female student involvement (theft). Compared to their white racial and ethnic counterparts, the most common charges for white students were drug or weapon possession (29%),<sup>137</sup> followed by trespassing (13%) and battery (12%).

When asked how school police officers justify and explain their policing of minor, low-level offenses by Black students, officers focus on “reforming students” irrespective of the seriousness of their behavior.<sup>138</sup> For instance, in an interview with school police officers about these offenses, one officer stated, “Our posture has not changed in how we respond to student behavior . . . . There are no significant shifts in the ways we conduct policing on campus. Our options, however, have changed. [We now have additional options] which have allowed us to refer [students] to campus structures such as restorative justice practices for nonpunitive and minor acts.”<sup>139</sup> Officers described their internal programs as responsible for diverting students to mental health and anger management programs. Data show that these diversion programs, however, are less utilized for Black students and kick in only after students are subjected to policing for minor offenses.<sup>140</sup> In other words, the harm is already done by police officers’ initial interactions with Black students.

Harold, a twelfth-grade Black student who attended majority-white schools for his schooling, described how “easy it is to be policed for stereotypical behavior

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137. I combined the categories of drug and weapon possession into one group. Unlike for Black students, fireworks possession was not included in this category for white students because there were no reported charges.

138. Interview with LASPD Officers, in L.A., Cal. (May 1, 2019). Throughout this Article, all interview participants have been given pseudonyms to protect the confidentiality of the data. This particular interview was conducted as a focus group with ten school police officers and the chief of school police. “The [police] officers know the kids so well. They know what’s best for the safety of the school and community.” *Id.* According to the Chief of Police from LASPD, this knowledge guides how school police interact with students. In an attempt to learn how the department conducts its policing of students on school campuses, I interviewed additional school police officers and asked how they knew what was best for students. One officer replied, “Knowing when to say to a student, ‘You need to be in jail because I know you and I know what you need.’” *Id.* Surprised by the certainty with which the officer made this statement, I asked, “Given what you know about the student, what is the department doing to prevent them from going to jail?” “We focus on what we can do to reform the student,” the Chief said to me, followed by a detailed overview of the role and responsibilities of school police. “Officers work 24/7, we focus on what’s happening before, during, and after school.” *Id.* “Officers are also given a high level of discretion; without it we would miss the personal connections [with the students],” he said to me. *Id.* “We teach. We mentor. We counsel. We partner with schools to host community events, all while protecting the school and the community.” *Id.* I asked, How do officers make sure they focus on student safety while handling various roles like teaching, counseling, and law enforcement? “We know the kids who are prone to trouble,” another officer responded. “The first thing we do is talk to the kid because we know them best and we know what’s best for them.” *Id.*

139. *Id.*

140. See ANNIE E. CASEY FOUND., INCREASE SUCCESSFUL DIVERSION FOR YOUTH OF COLOR 3, 7 (2022), <https://www.aecf.org/resources/increase-successful-diversion-for-youth-of-color> [<https://perma.cc/XPD3-7FVR>].

based on how [Black students] walk, talk, dress . . . . [I]t can be the difference between committing a crime or fitting right in place, that is, minus our Blackness.”<sup>141</sup> Research shows that disciplinary incidents that require others to subjectively characterize student behavior often manifest racial inequality, suggesting the pivotal role that biases and stereotypes play in decision-making among police officers.<sup>142</sup> Maurice, an eleventh-grader who attended the same school as Harold but lived in a different neighborhood, added,

The sight of me, a Black male in this [predominantly] white school and neighborhood is synonymous with consequences. And best believe you don’t got to do much to get the police called . . . best believe they will arrive in minutes with all the information they need to stop and question you . . . . [T]here’s a lot of prejudice towards Black youth and just youth of color and it’s expressed by the white residents, school campus police and administration, and the LAPD.<sup>143</sup>

Harold and Maurice’s experiences highlight the racial inequities caused by policing Black students in white spaces for non-serious, minor behaviors. A brief note about the use of single vignettes or frequencies among Black students: The reporting of single vignettes or frequencies among different subsets of the students illuminates specific themes and patterns. These are meant to be representative of the entire data sample.<sup>144</sup>

One explanation underlying these interactions, beyond implicit biases, is what I call “policing poverty.”<sup>145</sup> Policing poverty details how these interactions follow the same pattern as the city’s historical standard of vagrancy laws that criminalized poverty (poor people and those without employment or housing) and human

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141. Interview with “Harold,” in L.A., Cal. (Sept. 16, 2019).

142. See, e.g., Erik J. Girvan, *On Using the Psychological Science of Implicit Bias to Advance Anti-Discrimination Law*, 26 GEO. MASON U. C.R.L.J. 1, 5–7 (2015); Janaya Trotter Bratton & Rickell Howard Smith, *Growing Up a Suspect: An Examination of Racial Profiling of Black Children and Effective Strategies to Reduce Racial Disparities in Arrests*, 45 N. KY. L. REV. 137, 154, 159–60 (2018) (discussing how racial profiling and implicit biases held by members of law enforcement and legal system stakeholders are two factors that have led to the overcriminalization, and sometimes deaths, of Black and Latinx youth).

143. Interview with “Maurice,” in L.A., Cal. (Nov. 21, 2019).

144. The vignettes are drawn directly from the student statements during oral history interviews. When statements are quotations, those are direct quotations from the students. All other narratives from the vignettes are summarized for publication purposes due to the length of the oral history interviews. Full transcripts will be shared as a collective school policing archive that I am currently working on with local community members.

145. For examples of how “police overreach when a community suffers mostly from poverty, not violence,” see Bruce Western, *Poverty Police*, 47 CONTEMP. SOCIO. 22, 25 (2018) (reviewing STUART, *supra* note 61); David E. Patton, *Policing the Poor and the Two Faces of the Justice Department*, 44 FORDHAM URB. L.J. 1431, 1431 (2017); and Rachel Kent & John Raphling, *Interview: How Policing in One US City Hurts Black and Poor Communities*, HUM. RTS. WATCH (Sept. 12, 2019, 12:01 AM), <https://www.hrw.org/news/2019/09/12/interview-how-policing-one-us-city-hurts-black-and-poor-communities> [<https://perma.cc/44ZN-UE9P>].

location (those who did not belong or were deemed out of place).<sup>146</sup> Policing poverty thus begins long before a student's interaction with school police, making Black students' vulnerability to public order charges hard to avoid. It is not simply a response to school safety. Policing poverty is a mechanism that perpetuates policing racial incongruity problems that preoccupy Black students in white space. As noted, surveilling and punishing students who appear out of place in white spaces are core aspects of school policing.<sup>147</sup>

In Los Angeles, it is a historical standard for police to enforce harsher punishment against low-income Black residents than against other residents, particularly for minor, non-criminal public order infractions.<sup>148</sup> While historical standards for policing vagrancy may explain these interactions, understanding the goals and impact of this form of policing in the lives of Black students is essential.

On one side of the debate, previous literature has explained how the behavior of Black students is viewed as synonymous with "a common, debased culture" which defines poor, urban neighborhoods.<sup>149</sup> These neighborhoods (and the association of Black students with them) are entangled in a culture of poverty. Scholars document how perceptions of Black students are driven largely by moral panic and formalized through individual and institutional ideologies and responses about students, which are "out of all proportion to the actual threat offered."<sup>150</sup> Legal historian Robin D.G. Kelley argues that this moral panic produces fear and loathing of Black culture, or culture wars that continue to be waged over Black youth who are viewed and treated as "social problems."<sup>151</sup>

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146. See RISA GOLUBOFF, *VAGRANT NATION: POLICE POWER, CONSTITUTIONAL CHANGE, AND THE MAKING OF THE 1960S* 115–17 (2016) (documenting how vagrancy laws were used to control "out of place" marginalized people).

147. See Fagan & Ash, *supra* note 107, at 53 (discussing disproportionate enforcement of low-level offenses against people of color).

148. See generally KELLY LYTTLE-HERNÁNDEZ, *CITY OF INMATES: CONQUEST, REBELLION, AND THE RISE OF HUMAN CAGING IN LOS ANGELES, 1771–1965* (2017) (describing how Los Angeles's high incarceration rates were fueled by animus against its Indigenous, immigrant, and Black populations).

149. ROBIN D.G. KELLEY, *YO' MAMA'S DISFUNKTIONAL!: FIGHTING THE CULTURE WARS IN URBAN AMERICA* 18 (1997) (noting that what defines these areas are "members' common behavior—not their income, their poverty level, or the kind of work they do"). While these perspectives could be right or could be wrong, they nonetheless correctly account for biased institutional responses as well as negative stereotyping of Black people.

150. See STUART HALL, CHAS CRITCHER, TONY JEFFERSON, JOHN CLARKE & BRIAN ROBERTS, *POLICING THE CRISIS: MUGGING, THE STATE AND LAW AND ORDER* 20 (2d. ed 2013). These perceptions have the effect of warranting illicit and high-risk behavior. Although the argument rests in monolithic interpretations of urban culture, a culture of poverty appears to undergird Black students' experiences with school police in white space, ultimately rendering invisible a wide array of complex structural and environmental factors.

151. KELLEY, *supra* note 149, at 4; see *id.* at 8 (defining "culture wars" as an "ongoing battle over representations of the black urban condition, as well as the importance of the cultural terrain as a site of struggle"). The "cultural wars" help explain micro-, meso-, and macro-level economic and structural inequalities that constrain the progress of urban Black youth while neighborhood conditions for urban Black residents continue to deteriorate. See Pedro A. Noguera, *The Trouble with Black Boys: The Role and Influence of Environmental and Cultural Factors on the Academic Performance of African American Males*, 38 *URB. EDUC.* 431, 433–34 (2003).

What follows is social actors placing the locus of blame on individual and cultural failure within the Black community and focusing on fixing the behavior of Black students to restore a moral social order.<sup>152</sup> Thus, there is a direct relationship between criminality and Blackness,<sup>153</sup> the need to control and discipline Black behavior, and—in the case of students—an overreliance on minor behavioral infractions or public order charges.

Policing poverty helps to explain the behavior of school police officers who engage in aggressive enforcement of minor public order charges against low-income Black students—defending whiteness by criminalizing poverty through arrests, citations, and routine stops and questioning. It also helps to see Black students' behavioral phenomena as constitutive of larger structural and ecological systems. This lends a better understanding of the formation and function of, and Black students' interactions with, school police and the department's relation to the structural conditions that undergird not only majority-Black urban spaces but also those that are majority-white.<sup>154</sup> This conceptualization of student behavior highlights the distinct trajectories and ecologies of schools, neighborhoods, and school police departments that shape the ways many Black students develop, particularly as a byproduct of the relationship between police and the social and economic conditions of schools and communities.<sup>155</sup> Furthermore, incorporating these political and economic processes can provide insight into how a race-place-institution perspective influences the stability of and changes the racialization of white space and the educational inequality, racial stratification, and residential racial segregation as a result.

The findings in this Section present two significant implications. Firstly, the presence of police officers and other stakeholders inadvertently reinforces the notion that Black students do not belong in predominantly white spaces. Secondly, Black students experience continuous scrutiny that often bypasses their white counterparts. Building on legal scholar LaToya Baldwin Clark's conceptualization of public education as a private community, these police-student interactions fundamentally shape notions of entitlement and the right to occupy predominantly white spaces, influence the perception of acceptable student behaviors, and dictate the use of punitive and nonpunitive measures in response to rule violations.<sup>156</sup> Baldwin Clark's scholarship shines a light on

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152. See Hinton, *supra* note 1, at 811; SOJOYNER, *supra* note 23, at 61, 123–26.

153. See Jennifer L. Eberhardt, Phillip Atiba Goff, Valerie J. Purdie & Paul G. Davies, *Seeing Black: Race, Crime, and Visual Processing*, 87 J. PERSONALITY & SOC. PSYCH. 876, 876 (2004).

154. See Capers, *supra* note 49, at 68–69.

155. See ARUM, *supra* note 34, at 196–97 (2003); Allen & Gomez, *supra* note 34, at 5 (examining the school community context, and noting that “how students weigh school policing in their school-community assessments can offer insights into the multi-layered and punitive conditions Black students face in establishing, maintaining, or reclaiming agency over their time and future hopes”).

156. See LaToya Baldwin Clark, *Education as Property*, 105 VA. L. REV. 397, 398 (2019) (describing the use of criminal and civil processes against parents enrolling children in school districts in which they do not reside as “allow[ing] private parties to think of public, geographically bound resources as their private property that deserves law enforcement protection”).



how neighborhoods and communities justify an unfair system that regulates Black children in predominantly white schools through the presence of police.<sup>157</sup>

#### F. COLLATERAL CONSEQUENCES OF SCHOOL POLICING

School policing affects adults as well. An important role of school police officers is to patrol not only school campuses but also their surrounding neighborhoods. Therefore, one of the unique features of school police officers compared to other law enforcement in schools, such as school security officers and school resource officers, is their ability to cite and arrest adults in addition to students.

The extra authority granted school police officers to patrol the neighborhoods surrounding schools has ruined the lives of many adults and Black students.<sup>158</sup> During my analysis of all school policing cases involving adults,<sup>159</sup> I stumbled upon an interesting theme implicating adults: pretextual traffic stops. Black and Latino adults driving in Los Angeles's white spaces (and across the entire city) are disproportionately pulled over, cited, and arrested in traffic stops.<sup>160</sup> Black and Latino adults are often stopped for driving on a suspended license around and near white schools, one of the top five most common charges assessed by school police in Los Angeles.<sup>161</sup>

While the complexity of school police officer interaction with adult Black drivers through pretextual traffic stops is certainly not the focus of this Article, it nevertheless raises a host of intriguing questions about its impact on Black students. This is especially the case given previous literature documenting traffic stops as sites for racial profiling.<sup>162</sup>

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157. See *id.* at 401–02.

158. See Allen & Noguera, *supra* note 5, at 10–11 (examining how Black students come into initial contact with school police officers in school or within the surrounding neighborhoods and experience a full continuum of care and courtesy that is often followed by punitive social control).

159. See discussion *supra* Part II.

160. Data results come from the Los Angeles School Police Department's records from 2014 to 2017. See discussion *supra* Section II.B.

161. See *supra* Section II.B.

162. Considerable research has documented and examined Black and Brown people's experiences of racialized traffic stops. See generally, e.g., Carbado, *supra* note 52; David A. Harris, *The Stories, the Statistics, and the Law: Why "Driving While Black" Matters*, 84 MINN. L. REV. 265 (1999); Adero S. Jernigan, *Driving While Black: Racial Profiling in America*, 24 LAW & PSYCH. REV. 127 (2000); Anthony E. Mucchetti, *Driving While Brown: A Proposal for Ending Racial Profiling in Emerging Latino Communities*, 8 HARV. LATINO L. REV. 1 (2005); Kathryn K. Russell, "Driving While Black": Corollary Phenomena and Collateral Consequences, 40 B.C. L. REV. 717 (1999); Victoria Bekiempis, *Driving While Black in Ferguson*, NEWSWEEK (Aug. 14, 2014, 9:10 PM), <http://www.newsweek.com/ferguson-profiling-police-courts-shooting-264744> [<https://perma.cc/2YLF-4H8W>] ("[I]t is clear that many of the people stopped for traffic violations feel that they were targeted for their race."); Wesley Lowery, Carol D. Leonnig & Mark Berman, *Even Before Michael Brown's Slaying in Ferguson, Racial Questions Hung Over Police*, WASH. POST (Aug. 13, 2014, 10:38 PM), [https://www.washingtonpost.com/politics/even-before-teen-michael-browns-slaying-in-mo-racial-questions-have-hung-over-police/2014/08/13/78b3c5c6-2307-11e4-86ca-6f03cbd15c1a\\_story.html](https://www.washingtonpost.com/politics/even-before-teen-michael-browns-slaying-in-mo-racial-questions-have-hung-over-police/2014/08/13/78b3c5c6-2307-11e4-86ca-6f03cbd15c1a_story.html) ("It has been 'very hostile' for years, said Anthony Ross. . . . 'Everybody in this city has been a victim of DWB [driving while black],' he said." (alteration in original)).

Accordingly, the policing of adults by school police officers deserves future research and a more prominent place in conversations about how to address school police officers' roles and goals. An ordinary traffic stop in white spaces can result in many Black students' first experiences with school police officers (as passengers) and frequent interactions with officers at school thereafter. In this way, Black students become "targets" of school policing.

Take Brittany's story. Brittany is a twelfth-grade student who grew up in high-poverty Black neighborhoods within South Central Los Angeles but attended high school in the predominantly white neighborhood of Hollywood Hills. One day, a school police officer arrested her mother while she was driving Brittany to school. The officer allegedly stopped them because of a broken taillight. After requesting her mother's driver license, the school police officer returned to his patrol car to check it against police records. Upon discovering that her mother had a suspended license, the officer arrested her mother and towed the car. Brittany was picked up and taken to school by her father. That day was the beginning of Brittany's "being targeted by the same police officer" who stopped her mom.<sup>163</sup>

It's what you call driving while Black, as a Black parent, as a Black mother, and the consequences of being the Black child that witnessed all of it take place. I was scared because I knew what the worst that could have happened during that stop. I thought of Black women like Sandra Bland. It was unfortunate that my mind went straight to the negative but I couldn't help it . . . That is and was my introduction to the school police officer at my school as a ninth-grader. For months, I didn't even know we had a school police officer. But after that day, I was reminded that the school police officer had been present every day and I just was one of the lucky ones that made it throughout my school day without any interactions. This story had changed though . . . because now I was on his radar. He would ask me questions about mom, about where I lived, and how I was doing in school . . . That traffic stop was the entryway down

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163. For a descriptive account of how police violence is gendered in ways that affect Black women, see generally KIMBERLÉ WILLIAMS CRENSHAW, ANDREA J. RITCHIE, RACHEL ANSPACH, RACHEL GILMER & LUKE HARRIS, *SAY HER NAME: RESISTING POLICE BRUTALITY AGAINST BLACK WOMEN* (2015), [https://scholarship.law.columbia.edu/cgi/viewcontent.cgi?article=4235&context=faculty\\_scholarship](https://scholarship.law.columbia.edu/cgi/viewcontent.cgi?article=4235&context=faculty_scholarship) [<https://perma.cc/TW9S-HQ59>]. During my interview, Brittany referenced Sandra Bland, whose arrest is an example of Black women's vulnerability to police violence incidental to traffic-infraction stops.

On July 10, 2015, in Prairie View, Texas, police officer Brian T. Encinia stopped Bland for failing to use her turn signal. Within minutes, Bland was arrested for allegedly assaulting Encinia and was hauled off to jail. A few days later, Bland was found dead in her cell. A medical examiner ruled her death a suicide, and publicly released documents suggest[ing] that Bland may have indicated to jail officials that she suffered depression and had tried to kill herself in the past. Bland's family, meanwhile, insists that there is no evidence that Bland previously attempted suicide and that Bland was looking forward to starting a new job and would not have taken her own life.

Bland's death, like [Walter] Scott's, is an example of how an ordinary traffic stop can be a gateway to extraordinary police violence.

Carbado, *supra* note 68, at 150 (citations omitted).

what I thought was an invasive school experience. I felt like I had a probation officer, and I was checking in with them on a daily basis. I couldn't escape it. I was stamped, as a target for police stops and questioning, before school, during school and after school . . . for the rest of my time at . . . high school.<sup>164</sup>

Brittany's experiences with the school police officer demonstrate the collateral consequences of an ordinary traffic stop; it can be a gateway to frequent police interactions in white spaces.<sup>165</sup> During these interactions, school police officers use techniques to gain intimate familiarity with the students accompanying the policed adults. In my interviews with students, subsequent police–student encounters were typically characterized as inquiries into schooling experiences and academic progress and, for the most part, caring and cordial interactions between the police officer and the students with whom they sought to build rapport.

I do not mean to imply that school police officers always have negative intentions when they interact with Black students after traffic stops and throughout their time at school. My point is not about determining the officers' intentions; it's about recognizing the complexity of school police officers' roles and the various methods they use for maintaining safety and order in schools and neighborhoods. This complexity means interactions, like Brittany's, can involve school police officers' multiple roles and tactics for stopping, citing, and arresting students. These approaches can also be seen as relationship building with students through acts of courtesy and care, as mentors or counselors do.<sup>166</sup> Out of the ninety-five student interviews, 21% described encountering their school police officer through some form of a traffic stop near the school. Police officers regularly told students that they would check up on how they were doing in school and that this would not be the last time they would interact.

Still, we must keep in mind that even well-intentioned interactions can become an entryway into surveilling Black students.

As Tory, a twelfth-grade student who attended predominantly white schools for most of her schooling, shared:

The officer told me that this marked the beginning of building a relationship with him. He offered his support and care, and told me to stay out of trouble. Simple police stop due to my mom's failure to fully stop at a stop sign turned into what felt like a one-on-one meeting with the school police officer. I always heard how friendly he was from other students at my school, but this was the first time witnessing it. And he lived up to it in ways that were not always inviting. I remember him stopping by my classes just to pop his head into the door to check to see if I was in class, or even inviting himself into my friend group discussions during lunch time. What really irked me was the fact that he started calling me by my nickname, which he heard through my mom's

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164. Interview with "Brittany," in L.A., Cal. (June 13, 2019).

165. See Capers, *supra* note 49, at 70.

166. Also present in Brittany's story is the role of laws such as the Fourth Amendment reasonableness doctrine as it relates to her mother's vulnerability. For an excellent account of this matter, see generally Carbadó, *supra* note 68.

and I interaction during the stop. It became quite invasive; some students welcome this while others like myself could have done schooling without it.<sup>167</sup>

As we see from Tory's story, her informal monitoring by the school police officer during the traffic stop was supported by formal surveillance techniques during school. Officers regularly tracked the students they encountered during traffic stops to build relationships. This approach overlaps with community policing models whereby officers attempt to build familiarity and trust with community members to improve their legitimacy in the community.<sup>168</sup> As eleventh-grader Gerald stated, the officer's justification was typically, "I just want to make sure you feel safe and see what you are up to."<sup>169</sup>

In some interviews, students felt obligated to provide officers with their class schedules, information about their families and backgrounds, and, in some cases, their social media accounts to prove their innocence. Tory's and Brittany's experiences with intrusively caring officers are not so incongruous with other students' experiences with feeling pressure to submit to monitoring. Indeed, for some students, providing this information to school police officers to quell a presumption of guilt was then used to interrogate them and "fish for information about supposed crime and misbehavior about other students."<sup>170</sup> These fishing tactics "reminded [Black students] of their racialized vulnerability to police scrutiny, and the physical markers of that vulnerability were transformed into data points that consolidated their status . . . as a threat group to be tracked" in white spaces.<sup>171</sup>

I found out that the police used my social media to find my other Black friends' social media accounts. They tracked who I associated with, to then engage with them and inquire about their family and background and whereabouts. It felt like a cycle of surveillance that was triggered by [my Black] father stopping in the loading zone to pick me up from school. It felt like the students had to prove their innocence, just like my father had.<sup>172</sup>

Gerald's observations resonate with research showing that data collected from police stops contribute to an increased focus on controlling Black students through punishment.<sup>173</sup> Policing in predominantly white spaces aims to control the day-to-day activities and social connections of Black students, associating them with criminality for minor misbehaviors like tardiness or loitering.<sup>174</sup>

167. Interview with "Tory," in L.A., Cal. (Jan. 3, 2020).

168. See MICHAEL D. WHITE & HENRY F. FRADELLA, STOP AND FRISK: THE USE AND ABUSE OF A CONTROVERSIAL POLICING TACTIC 167–68 (2016); Tom R. Tyler, *Enhancing Police Legitimacy*, 593 ANNALS AM. ACAD. POL. & SOC. SCI. 84, 91–93 (2004).

169. Interview with "Gerald," in L.A., Cal. (Jan. 15, 2020).

170. *Id.*

171. See Rios et al., *supra* note 27, at 69 (discussing gang-associated Latinos).

172. Interview with "Gerald," *supra* note 169.

173. Cf. Rios et al., *supra* note 27, at 69 (supplying this analysis with respect to the surveillance of Latinos by police).

174. See *id.*

Gerald, for example, received a citation for loitering. This encounter contributes to the additional stigma placed on Black students, a population already racially labeled as criminal, emphasizing the policing of minor acts rather than violent or harmful behavior.<sup>175</sup>

#### IV. PROBLEMS OF SCHOOL POLICING IN WHITE SPACE

How do *we* begin to reimagine safety in schools? For decades, communities have made calls for reform and demands for school districts to “defund” and dismantle police departments.<sup>176</sup> Approximately 65% of students interviewed focused on establishing *ex post* limitations on police officers’ powers and discretion, while the remaining 35% focused on *ex ante* mechanisms such as training and eligibility requirements.<sup>177</sup> Unique to the students’ narratives was the acknowledgment of larger structural and systemic features (for example, segregation, history, ghetto-related stereotypes, and financial investments in police forces) as connected to *ex ante* and *ex post* mechanisms for regulating school police officers.<sup>178</sup> In the words of Mina, an eleventh-grade Black student residing in a predominantly Black and Latinx neighborhood while attending school in a predominantly white neighborhood:

Systems and structures, that’s what we need to change . . . not the day-to-day interactions with school police or their roles or their training. It starts with the foundation of school police departments, why they were created and how they have ventured off to those goals and how systems like funding continue to help them do harmful things to Black and Brown students. In fact, it’s so much bigger than just one school police department and policing itself, but think about how this connects to Black graduation rates or even the fact that students like

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175. *See id.*

176. *See* AMIR WHITAKER, JESSICA COBB, VICTOR LEUNG & LINNEA NELSON, ACLU CAL., NO POLICE IN SCHOOLS: A VISION FOR SAFE AND SUPPORTIVE SCHOOLS IN CA 6, 31 (2021), [https://www.aclusocal.org/sites/default/files/field\\_documents/no\\_police\\_in\\_schools\\_-\\_report\\_-\\_aclu\\_-\\_082421.pdf](https://www.aclusocal.org/sites/default/files/field_documents/no_police_in_schools_-_report_-_aclu_-_082421.pdf) [<https://perma.cc/S5HH-NA9J>]; *see also* Sonali Kohli & Howard Blume, *For Teen Activists, Defunding School Police Has Been a Decade in the Making*, L.A. TIMES (June 15, 2020, 5:00 AM), <https://www.latimes.com/california/story/2020-06-15/defund-police-schools-case-security-guards-campus>; *Mission, DIGNITY IN SCHS.*, <https://dignityinschools.org/about-us/mission/> [<https://perma.cc/98ML-EHX2>] (last visited Feb. 11, 2024); Astrid Galvan, *Fight for Police-Free Schools Has Been Years in the Making*, AP NEWS (July 25, 2020, 12:06 PM), <https://apnews.com/article/bc5b750085a89e03e132d7d3dda09a99> [<https://perma.cc/W3S9-G9CU>]; Press Release, Advancement Project, National Education Justice Organizations to Host a Day of Action Demanding Police-Free Schools (Dec. 4, 2018), <https://advancementproject.org/news/national-education-justice-organizations-to-host-a-day-of-action-demanding-police-free-schools/> [<https://perma.cc/FP56-CBWH>]; Press Release, Student Voice, Thousands of Students Launch Move School Forward: 30 Days of Action Campaign (July 1, 2020), <https://www.stuvoice.org/updates/thousands-of-students-launch-move-school-forward-30-days-of-action-campaign> [<https://perma.cc/B7M6-GTWW>].

177. For a helpful description of both *ex post* and *ex ante* mechanisms for constraining school policies, see Barbara A. Fedders, *The End of School Policing*, 109 CALIF. L. REV. 1443, 1491–96 (2021). Please note that the percentages listed here are connected to the student interviews and not to Professor Fedders’s work.

178. *See* Capers, *supra* note 49, at 62–72 (arguing that police practices directly contribute to persistent residential segregation).

myself have to travel outside of our neighborhoods to even attend this school.<sup>179</sup>

Mina's assertions point to how the relationship between school police and Black students in white space is embedded in larger societal and structural conditions and the political economy, producing clear racialized outcomes that exclude and marginalize Black students as they are policed.

Although this Article examines the scope and scale of these interactions in Los Angeles, home to the second-largest school district and one of the largest school police departments in the country, its findings reinforce anecdotal evidence from other school districts around the country that documents racial disparities in school policing with respect to space.<sup>180</sup> Take Oakland Unified School District for example. In 2020, the district ended police officers' presence in schools to shift school safety toward the goal of creating campuses free from racial inequalities in arrests and citations: "[F]ree from racism, free from implicit bias, free from fear and free from physical danger."<sup>181</sup>

This Part rounds out the analysis by examining the legal and policy concerns around school policing, as shown in Parts II and III. Here, I offer a two-step proposal for reform. First, I draw particular attention to the recommendation made in some communities for police officers to be removed from schools and for school districts to eliminate or substantially reduce the budget of school police departments. I argue that for some communities, policing in white schools is not a problem of policing but a problem of protecting whiteness and white property interests, which are fueled by racial incongruity and contribute to racial inequality.<sup>182</sup> Certainly, as is apparent in this Article's student interviews, these features are major structural problems that produce disproportionate policing in white spaces. Fully removing police from schools and defunding school police departments' budgets will be impossible without more fundamental shifts in the preservation of white spaces that target Black students who are deemed out of place. Addressing these structural problems may be best addressed outside the criminal justice system. If school police officers are to remain in schools, my second

179. Interview with "Mina," in L.A., Cal. (Feb. 3, 2020).

180. If the same trends are confirmed in other school districts, they would also mark important steps backward from schools' commitments to reducing citations, arrests, and criminal justice involvement with respect to race and place.

181. Jasmine Williams, *Lessons From Oakland's Move to Police-Free Schools*, EDSource (Sept. 21, 2021), <https://edsources.org/2021/lessons-from-oaklands-move-to-police-free-schools/661400> [https://perma.cc/M4FE-FBC9].

182. See Lowe et al., *supra* note 58, at 13 (indicating that white residents engage in "'policing place' from perceived outsiders who are viewed as unfamiliar and criminal threats" such that "some people of color are viewed with suspicion simply for being present in a predominantly [w]hite neighborhood" (internal citation omitted)); Barbara Harris Combs, *Everyday Racism Is Still Racism: The Role of Place in Theorizing Continuing Racism in Modern US Society*, 55 *PHYLON* 38, 52 ("Once individuals are coded as being out of place, white logics are triggered that justify and rationalize fear and fear responses, which amount to everyday racism (or worse)."). See generally Cheryl I. Harris, *Whiteness as Property*, 106 *HARV. L. REV.* 1707 (1993) (discussing the formation of whiteness as a racial identity and situating spatial belonging and property ownership within a racialized hierarchy).



proposal, which borrows from reforms already being implemented across the country, would limit the responsibilities of school police to protecting school property.<sup>183</sup>

To that end, the following Sections model how scholars and policymakers might ask and answer questions about the root factors underlying the racial disparities school policing produces in predominantly white schools. By examining school policing in predominantly white schools, we can explore crucial links between the structural factors faced by Black students and concrete reforms. This Article's proposals are not comprehensive, but they open the door for reformers to consider new strategies and new school safety, police authority, and police governance structures.

#### A. COMMUNITY CALLS FOR POLICE-FREE SCHOOLS

"It's what they call the beginning of mass incarceration and the larger criminal justice system for like those of us who choose school rather than a life in the streets," says Jamar, an eleventh-grader living in a predominantly Black and Latinx neighborhood while attending school in a predominantly white neighborhood.<sup>184</sup> He continues:

That's what school policing is. It's the entryway down a horrible path of losses. And for some of us, maybe even many of us, we always take the "L" [a loss] . . . it's something we can't even escape. Police in schools. Police in our neighborhoods. Police everywhere we go. The best-case scenario is that you get through a day without your learning interrupted or your walk to and from school delayed by being put in handcuffs . . . because we all know that being stopped and questioned, you know these everyday interactions with them, is part of what it means to be Black . . . and perceived as being from the worst neighborhoods in the city . . . they always like to remind us about that. We shouldn't be at fault for our circumstances. I'll tell you this and be done, the worst-case scenario at school is what I personally witnessed, my peers yanked out of the classroom, thrown to the floor, physically restrained, and arrested . . . and for something so minor or that they didn't even do . . . The worst thing is the stamp placed on you as a target for policing for the rest of your school time. I'm half stamped, always guilty by association . . . and the policing comes from not just the police officer or even teachers, but from the neighborhoods and

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183. ADVANCEMENT PROJECT & ALL. FOR EDUC. JUST., WE CAME TO LEARN: A CALL TO ACTION FOR POLICE-FREE SCHOOLS 17 (2018), <https://advancementproject.org/wp-content/uploads/WCTLweb/index.html> [<https://perma.cc/E7MM-GMGB>]; see Maya Riser-Kositsky, Stephen Sawchuk & Holly Peele, *School Police: Which Districts Cut Them? Which Brought Them Back?*, EDUC. WK. (June 29, 2022), <https://www.edweek.org/leadership/which-districts-have-cut-school-policing-programs/2021/06> (citing recent examples where schools have implemented non-sworn individuals to replace school police officers). Between May 2020 and June 2022, around 50 U.S. districts, serving over 1.7 million students, either terminated their school policing programs or reduced their school police budget. *Id.* While schools have either replaced or removed school police, realigning their role to addressing school property is a new idea that aligns with larger community calls that support the building of alternative school police programs.

184. Interview with "Jamar," in L.A., Cal. (Aug. 5, 2019).

people in the surrounding community too. It's bigger than just one person. It's like a policing network of people.<sup>185</sup>

The network Jamar references points to the structural imbalances embedded within school policing, extending beyond individual school police officers. Ray, another eleventh-grader living in a predominantly Black and Latinx neighborhood while attending school in a predominantly white neighborhood, describes the importance of pursuing alternatives to school policing to address the larger punitive and racialized systems underlying it. He notes that alternatives require school leaders and administrators to “consider the context of white schools and neighborhoods that [Black students] must navigate, and how it connects to the larger history of Los Angeles and the policing of Black people and Black kids.”<sup>186</sup> Ray suggests beginning with addressing the obvious power imbalance between students and school police officers—namely, how the latter “quickly rely [on] and resort to a citation or an arrest” for minor public disturbance charges.<sup>187</sup> Alternatives should include “more school counselors, therapist[s], social services and workers, and people committed to safety who are not just from the communities of which schools are, but are representative of the student body of those [who] are disproportionately police[d]. Schools need safety and caring advocates,” as Jamar shares.<sup>188</sup>

Many other Black students referenced how alternative school policing strategies should come “easy in white schools, where there's much funding to go around, especially with the additional million-dollar budget of the district's school police departments.” As shared by Ray, “these punitive and uncaring funding structures create[] and maintain[] networks to criminalize, watch, police and destroy the futures of Black and Brown students in white schools.”<sup>189</sup>

Ray's and Jamar's comments, like those of many other students interviewed, align with recent steps taken by the LAUSD toward reforming school safety to support students and address long-standing issues of racial inequity throughout the district.<sup>190</sup>

In 2021, the LAUSD Board embraced a new policy, the Black Student Achievement Plan (BSAP), to address the racial gaps in school policing. The historic vote cut LASPD's \$77.5 million annual budget by \$25 million and instead directed \$36.5 million to BSAP.<sup>191</sup> The plan reimagines school safety for Black students attending schools in predominantly low-income and Black communities

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185. *Id.*

186. Interview with “Ray,” in L.A., Cal. (Dec. 13, 2019).

187. *Id.*; see *supra* Part II.

188. Interview with “Jamar,” *supra* note 184.

189. Interview with “Ray,” *supra* note 186.

190. Melissa Gomez, *L.A. School Board Cuts Its Police Force and Diverts Funds for Black Student Achievement*, L.A. TIMES (Feb. 16, 2021, 10:04 PM), <https://www.latimes.com/california/story/2021-02-16/lausd-diverting-school-police-funds-support-black-students> [<https://perma.cc/W77F-QH9A>].

191. Shuttleworth, *supra* note 84. See generally L.A. UNIFIED SCH. DIST., BLACK STUDENT ACHIEVEMENT PLAN (2022), [https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/1334/Black%20Student%20Achievement%20Plan\\_022823.pdf](https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/1334/Black%20Student%20Achievement%20Plan_022823.pdf) [<https://perma.cc/TZ6N-NJ7U>].

through the implementation of community-based alternatives to school policing.<sup>192</sup> These alternatives include the hiring of mental health counselors, school climate coaches, and other personnel focused on safe passage programs, community intervention initiatives, and care-first restorative justice practices.<sup>193</sup> BSAP also demonstrates that operating police-free schools in LAUSD’s “high need[]” schools is both possible and necessary to foster caring and positive learning environments that prevent the disproportionate criminalization of Black children and adolescents.<sup>194</sup> High need schools are in areas where school policing is most concentrated, throughout Board District 1 in South Central Los Angeles.<sup>195</sup>

Not included in BSAP’s priorities are schools located in predominantly white and wealthy communities where arrest and citation rates are the highest for Black students.<sup>196</sup> This Section offers three conclusions, which are informed by existing research, that complement BSAP and help provide a “fully loaded cost accounting”<sup>197</sup> of school policing.

- (1) School police presence disproportionately harms Black children and adolescents not only in schools in predominantly Black or Latinx communities but also in predominantly white schools.
- (2) School police officers do not make schools safer.
- (3) School police’s million-dollar budgets prevent schools from investing in community-based safety alternatives.

First, school police presence disproportionately harms Black children and adolescents.<sup>198</sup> Of all arrests made and citations issued by LASPD in 2014–2017,

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192. See Gomez, *supra* note 190.

193. *Id.*

194. *Id.*

195. See ALLEN ET AL., *supra* note 32.

196. See Gomez, *supra* note 190. The 53 schools with the highest level of Black enrollment, 32% of all Black students in the district, are the focus of the initial BSAP activities. L.A. UNIFIED SCH. DIST., BLACK STUDENT ACHIEVEMENT PLAN: BOARD PRESENTATION 3 (2022), <https://www.lausd.org/cms/lib/CA01000043/Centricity/Domain/1334/Feb%208%20Board%20Report.pdf> [<https://perma.cc/75AS-5BWG>]. These schools receive 60% of the available funding (\$40.2 million). See *id.* at 5. The next group of 57 schools—where 28% of the district’s Black student population are enrolled—receives 25% of the available funding (\$16.9 million). *Id.* It is possible to address the historical educational disadvantages that the district’s schools with the highest enrollment of Black children face because of the unique focus on the experiences of Black students, especially in schools with a high concentration of Black and Latino students. Still, the Plan does not provide very much funding (\$9.4 million) to the district’s remaining 671 schools where the other 40% of Black students are enrolled. See *id.* These are the most racially segregated schools: majority-Latino or with a high concentration of white students. See *id.* As a result, I argue that BSAP ignores a crucial segment of Black pupils: those who attend schools with a high concentration of white students. Future research should explore the distinctions between Black pupils attending majority-minority (predominantly Latino) compared to majority-white schools.

197. PAINTER, *supra* note 127, at 16.

198. See U.S. DEP’T OF EDUC. OFF. FOR C.R., CIVIL RIGHTS DATA COLLECTION: DATA SNAPSHOT: SCHOOL DISCIPLINE 1, 6 (2014), <https://ocrdata.ed.gov/assets/downloads/CRDC-School-Discipline-Snapshot.pdf> [<https://perma.cc/4UZZ-KQLT>].

25% were against Black students despite their representing less than 9% of the district's student population.<sup>199</sup> These arrests and citations are disproportionately concentrated in predominantly low-income schools with a majority population of Black and Latinx students.<sup>200</sup> In wealthy and majority-white schools, Black students remain overrepresented in negative school police interactions, even as the share of Black students in these schools remains consistently low.<sup>201</sup> Although arrests and citations of Black students have declined over the past years, data show that significant racial disparities in policing remain across all schools.<sup>202</sup> For example, Black students are five times more likely to be arrested and cited by school police officers than white students, and two times more likely than Latinx students.<sup>203</sup> As shown in the previous Parts, the disproportionate punishment of Black students can be significantly attributed to entrenched racism and prejudice. Eliminating the LASPD and removing all police presence from LAUSD school campuses will reduce and reverse the racial disproportionality in school police interactions.

Black students, in particular, report a key second finding: they do not believe school police officers make schools safer. Recall in Part III that school police officers arrest and cite Black students for the lowest-level public disturbance offenses at a much higher, and thus disproportionate, rate compared to the rest of the student population.<sup>204</sup> Whereas popular discourse contends that serious crime in predominantly low-income and Black communities begets higher arrests and citations in those areas,<sup>205</sup> my data show that the most common charges against Black students in all LAUSD schools are interfering with school activity, reentering school after being asked to leave, and the use of offensive words.<sup>206</sup> In other words, Los Angeles's Black students are being arrested and cited for classroom disruption, not violence, and minor public order offenses, not physical harm. Instead of safety, police officers inhibit actual learning and create a dangerous school environment for Black students.

Public disturbance charges remain the brunt of police–student interactions. Recall the multiple student stories in Part III, as well as several publicly documented stories of Black students being arrested and cited for talking loudly in the classroom, throwing a tantrum,<sup>207</sup> and chewing gum.<sup>208</sup> Take, for example, the story of a Black girl named Niya Kenny who was grabbed by the neck, flipped to

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199. See *supra* Table 1.

200. Allen & Noguera, *supra* note 5, at 6.

201. See *infra* Appendices A, B, C.

202. See ALLEN ET AL., *supra* note 32.

203. See Allen & Noguera, *supra* note 5, at 7 tbl.2.

204. See *supra* notes 132–37 and accompanying text.

205. See Moriearty & Carson, *supra* note 132, at 283–84.

206. See *supra* notes 132–37 and accompanying text.

207. See Luke Darby, *Florida Police Officer Arrested and Handcuffed a 6-Year-Old Black Girl for a Tantrum in Class*, GQ (Sept. 23, 2019), <https://www.gq.com/story/six-year-old-black-girl-arrested-for-a-tantrum> [https://perma.cc/MC5W-E4F7].

208. See Julian Glover, *Pushed Out: How Excessive School Discipline Against Black Girls Leads to Drop Out, Incarceration*, ABC7 News (Mar. 10, 2021), <https://abc7news.com/black-girls-suspended->

the floor, and then grabbed again and thrown across the floor by a school police officer for refusing to leave the classroom after responding to a text message.<sup>209</sup> She was later handcuffed and arrested. Niya's story, like many other Black students' experiences with school police officers, calls into question the seriousness of a student's offenses in relation to the arrest and the use of force imposed.

Common questions posed by the proponents of school policing for school safety purposes include: Who will address school threats and violence? Who will stop a school shooter?<sup>210</sup> Who will break up fights? What if kids have drugs at school?<sup>211</sup> These questions are posed as justifications for maintaining or increasing the number of school police officers;<sup>212</sup> however, they are misguided.

A burgeoning literature suggests that persistent overrepresentation of Black students in negative school police interactions often stems from unremedied structural forces embedded within neighborhoods and schools and has contributed to mass incarceration and the infamous school-to-prison pipeline.<sup>213</sup> Addressing the material and symbolic interests embedded in white spaces that make the implications of racial hierarchy and inequality in school policing unavoidable—including protecting white space—is intensely necessary to rectify the harms imposed on Black students every day by school police officers. Black students in white spaces anticipate police interactions and work to navigate the multifaceted roles of school police officers. They must engage in the “dance” around various forms of racism emanating from ghetto-associated stereotypes when circumstances demand Black students provide demonstrative, social proof that negates these presumptions and display law-abiding status.<sup>214</sup> Eliminating the LASPD and removing all police from LAUSD schools will ensure that

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more-than-white-pushed-out-school-to-prison-pipeline-school-pushout/10405118/ [https://perma.cc/5XT7-5XXL].

209. See Richard Fausset & Ashley Southall, *Video Shows Officer Flipping Student in South Carolina, Prompting Inquiry*, N.Y. TIMES (Oct. 26, 2015), <https://www.nytimes.com/2015/10/27/us/officers-classroom-fight-with-student-is-caught-on-video.html>.

210. See Caitlynn Peetz, *School Police Prevent Some Violence, but Not Shootings, Research Finds*, EDUC. WK. (July 7, 2023), <https://www.edweek.org/leadership/school-police-prevent-some-violence-but-not-shootings-research-finds/2023/07> [https://perma.cc/48EL-PVEK].

211. See Fedders, *supra* note 177, at 1456; Shabnam Javdani, *Policing Education: An Empirical Review of the Challenges and Impact of the Work of School Police Officers*, 63 AM. J. CMTY. PSYCH. 253, 264 (2019).

212. See Fedders, *supra* note 177, at 1456–57; Elizabeth S. Scott & Laurence Steinberg, *Blaming Youth*, 81 TEX. L. REV. 799, 807 (2003).

213. Examples of unremedied structural forces include but are not limited to: racial segregation, views toward policing, historical context, school police training, and agency and district policy. See, e.g., Allen & Noguera, *supra* note 5, at 2–5 (reviewing scholarly literature to build a theoretical framework that explains the structural dynamics underlying Black students' vulnerability to negative interactions with school police in low-income Black schools).

214. See *supra* notes 54–58, 149–53, 170–75 and accompanying text; see also Anderson, *supra* note 13, at 13 (“[A] black person's deficit of credibility may be minimized or tentatively overcome by a performance, a negotiation, or what some blacks derisively refer to as a ‘dance,’ through which individual blacks are required to show that the ghetto stereotypes do not apply to them; in effect, they perform to be accepted. This performance can be as deliberate as dressing well and speaking in an educated way or as simple as producing an ID or a driver's license in situations in which this would never be demanded of whites.”).

students are physically safe from both the possibilities of violent incidents to being cited and arrested for low-level offenses that are more appropriately handled by school administration and the larger unremedied structural forces that neither public policy nor law can address.

The third finding to support community recommendations is that LASPD's \$53 million budget prevents schools from investing in community-based safety alternatives that are independent of law enforcement. These alternatives include hiring mental health counselors, school climate coaches, and other personnel focused on safe passage programs, community intervention initiatives, and care-first restorative justice practices.<sup>215</sup> Oakland Unified School District's 2020 decision to eliminate school police officers required hiring twelve school climate ambassadors and a district-wide safety coordinator.<sup>216</sup> Climate ambassadors are responsible for responding to all campus activity previously handled by school police officers, working with an on-site team of therapists, counselors, and social workers to assess students' mental health needs and engaging with parents when appropriate.<sup>217</sup> The district-wide safety coordinator oversees school safety planning across all campuses and serves as the liaison to the Oakland Police Department, should school activity require escalation.<sup>218</sup>

Evidence from Oakland shows that the district's schools' increased availability of care-first and restorative resources allows students the opportunity to de-escalate stressful situations, find mental health support, and work with teachers and administrators to address systemic inequities, both in school and beyond, that contribute to students' misbehavior.<sup>219</sup> Oakland introduced a version of climate ambassadors called "Culture Keepers" and "Site Culture and Climate Ambassadors."<sup>220</sup> The purpose of these roles is to promote school safety through relationship building, de-escalation techniques, and the use of trauma-informed restorative practices.<sup>221</sup> More research is needed to evaluate the effectiveness of these new roles, especially as more school districts consider alternatives to the traditional school policing model. Many schools still face behavioral issues from students, and culture keepers and climate ambassadors struggle to resolve these issues, pointing to the important role of larger school support teams with multiple nonsworn individuals to address school safety.<sup>222</sup> Future research should

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215. See Gomez, *supra* note 190.

216. Williams, *supra* note 181; see Theresa Harrington, *Oakland School Board Unanimously Agrees to Eliminate Its Police Force*, EdSOURCE (June 25, 2020), <https://edsources.org/2020/oakland-school-board-unanimously-agrees-to-eliminate-its-police-force/634544> [<https://perma.cc/U27K-KW8Z>].

217. Williams, *supra* note 181.

218. *Id.*

219. Williams, *supra* note 181. This matter goes beyond the scope of this Article though I hope to address it in my future work where I plan to distinguish between school police reform efforts and abolition efforts.

220. *Summary of Services*, OAKLAND UNIFIED SCH. DIST., <https://www.ousd.org/community-schools-student-services/summary-of-services> [<https://perma.cc/6B8Q-C5AJ>] (last visited Mar. 22, 2024).

221. *Id.*

222. For example, while some argue that Oakland's decision to eliminate school police remedied the many issues associated with policing students in schools, others doubt that the move made schools safer. See Ashley McBride, *Balanced Budget, Chronic Absenteeism, and School Safety Are Top Concerns for*



place greater focus on implementing alternatives and addressing the structural causes underlying lack of school safety and behavioral issues.<sup>223</sup>

Given federal and state funding allocations for schools to hire more school police officers,<sup>224</sup> it is hard to imagine that schools cannot afford investment in community-based alternatives when steady increases have been made to fund school police officers throughout the past few decades. Take Los Angeles for instance. Even when reductions to school police departments were made in the most recent years, LASPD budgeted an additional \$11 million, on average, per year in overtime.<sup>225</sup> It may be true that this constitutes a significant expenditure for a “cash-strapped” district<sup>226</sup> at the expense of preventing and preparing for mass threats and other campus threats.<sup>227</sup> However, apart from recent reform through BSAP to reduce the school police budget, LASPD’s million-dollar budget<sup>228</sup> has remained high since its inception in 1948,<sup>229</sup> even with recent cuts.<sup>230</sup> The school police department’s focus on revenue and minor public order

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*OUSD This Year*, THE OAKLANDSLIDE (Jan. 11, 2024, 3:00 PM), <https://oaklandside.org/2024/01/11/balanced-budget-chronic-absenteeism-school-safety-oakland-board/> [<https://perma.cc/9T99-GRDQ>]; see also *Oakland School Board Votes to Remove OUSD Police From School Campuses*, CBS NEWS (June 24, 2020, 9:00 PM), <https://www.cbsnews.com/sanfrancisco/news/oakland-unified-school-district-board-votes-to-remove-police-from-schools-george-floyd-resolution/> [<https://perma.cc/434H-CQJV>]. With growing violence in schools, including more school shootings in recent years, some districts are bringing back law enforcement. By 2022, eight districts that had initially removed police from schools changed their decisions and reintroduced them. Riser-Kositsky et al., *supra* note 183. One example is Denver Public Schools, where the board decided to bring back school police after two school shootings in February and March of 2022. Jessica Seaman, *Denver School Board Reverses 2020 Ban on Police in Schools, Paving Way for Long-Term Return of SROs*, DENV. POST (June 15, 2023, 8:19 PM), <https://www.denverpost.com/2023/06/15/denver-reinstates-school-resource-officers/> [<https://perma.cc/2MLM-DA76>]. Oakland’s schools have continued without school police, but the behavior of other school districts suggests that increasing school safety supports may be needed.

223. See Riser-Kositsky et al., *supra* note 183 (pointing to examples of other school support team members that school districts have implemented as alternatives to school police officers).

224. See NATHAN JAMES, CONG. RSCH. SERV., IF10922, COMMUNITY ORIENTED POLICING SERVICES (COPS) PROGRAM (2021), <https://crsreports.congress.gov/product/pdf/IF/IF10922>; see also *Supporting Safe Schools*, DOJ, CMTY. ORIENTED POLICING SERVS., <https://cops.usdoj.gov/supportingsafeschools> [<https://perma.cc/L82T-U6QX>] (last visited Mar. 23, 2024).

225. This analysis was conducted in concert with several community organizations in Los Angeles. Forthcoming reports will document these numbers in more detail, including a line-item analysis of LASPD spending.

226. Taylor Swaak, *Strike or No Strike, LAUSD Has Another Problem: Crippling Debt*, L.A. DAILY NEWS (Jan. 11, 2019, 3:47 PM), <https://www.dailynews.com/2019/01/11/strike-or-no-strike-laUSD-has-another-problem-crippling-debt/> [<https://perma.cc/4Q5X-Q4TZ>] (debating the debt faced by the school district).

227. See Jonathan Pushman, *Law Enforcement in Schools: A New Option Is Available for New Jersey*, 47 SCH. LEADER, May–June 2017, at 14, 14.

228. See Shuttleworth, *supra* note 84.

229. Szymanski, *supra* note 15.

230. Gomez, *supra* note 190; Shuttleworth, *supra* note 84. And, in recent years, several stories have documented increasingly disturbing acts of excessive force and violence from school resource officers and school police. For example, a school police officer fatally shot a man outside of a middle school in LAUSD. Howard Blume, *Man Is Shot by School Police in South L.A. After Allegedly Harassing Students*, L.A. TIMES (Sept. 29, 2021, 7:19 PM), <https://www.latimes.com/california/story/2021-09-29/man-is-shot-by-school-police-in-south-l-a-after-allegedly-harassing-students>. In another particularly horrifying example, a school resource officer opened fire and shot unarmed eighteen-year-old Mona

charges impede the goals of school safety, only contributing to the racial harms faced by Black students.

Investing in community-based safety alternatives that are independent of law enforcement can lead to improvements in the cycle of arrests, citations, and other racialized punitive practices facing many Black students.<sup>231</sup> A recent report by the ACLU found that “1.7 million students are in schools with police but no counselors,” “3 million students are in schools with police but no nurses,” “6 million students are in schools with police but no school psychologists,” and “10 million students are in schools with police but no social workers.”<sup>232</sup> If LASPD’s \$53 million budget precludes all public schools in Los Angeles from investing in community-based alternatives, the cycle of minor, low-level infractions facing students will continue. “[T]ake money out of the school police department and put it directly into mental health support, counselors, academic counselors,” says Alex Caputo-Pearl, former president of the nation’s second-largest teachers’ union, United Teachers Los Angeles. “We can have 800 mental health supporters by using that money.”<sup>233</sup>

Over the past decade, community members have recommended that the Los Angeles School Board adopt a resolution to eliminate the LASPD and remove all police from LAUSD schools.<sup>234</sup> Many school districts across the nation have already begun taking steps to eliminate their school police departments and remove school police from their classrooms and campuses.<sup>235</sup> When students’ educational success and mental health are on the line, we must ensure that schools are positive learning environments. If we learned anything from the community’s long-standing calls to fully defund the LASPD, it is that Black children and adolescents disproportionately experience negative school police interactions across all communities in

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Rodriguez in the head in Long Beach Unified School District. Mona Rodriguez passed away days after the incident. Jonathan Lloyd & Tracey Leong, *Family of Mona Rodriguez Reaches \$13M Settlement with School District in Shooting Death*, NBC L.A. (Apr. 6, 2023, 9:00 AM), <https://www.nbclosangeles.com/news/local/family-of-mona-rodriguez-reaches-13m-settlement-with-school-district-in-shooting-death/3128754> [<https://perma.cc/J9T6-8WQN>]. These stories cannot be divorced from recent calls to eliminate school police departments and remove school police officers from our nation’s public schools.

231. See generally Fedders, *supra* note 177.

232. AMIR WHITAKER, SYLVIA TORRES-GUILLÉN, MICHELLE MORTON, HAROLD JORDAN, STEFANIE COYLE, ANGELA MANN & WEI-LING SUN, ACLU, COPS AND NO COUNSELORS: HOW THE LACK OF SCHOOL MENTAL HEALTH STAFF IS HARMING STUDENTS 4 (2019), [https://www.nyclu.org/sites/default/files/field\\_documents/030119-acluschooldisciplinereport.pdf](https://www.nyclu.org/sites/default/files/field_documents/030119-acluschooldisciplinereport.pdf) [<https://perma.cc/8V2W-VQVV>].

233. Sonali Kohli, *Eliminate School Police, L.A. Teachers Union Leaders Say*, L.A. TIMES (June 8, 2020, 7:17 PM), <https://www.latimes.com/california/story/2020-06-08/defund-school-police-utla-blm>.

234. E.g., Howard Blume, *Scrap School Police and Add Counselors and Academic Help for Black Students, Coalition Says*, L.A. TIMES (Feb. 1, 2023, 5:00 AM), <https://www.latimes.com/california/story/2023-02-01/ban-l-a-school-police-and-add-more-counselors-academic-help-for-black-students-group-says>.

235. E.g., Katie Reilly, *Oakland Is Disbanding Its School Police Force as George Floyd’s Death Drives the Push for Police-Free Schools*, TIME (June 25, 2020, 1:22 PM), <https://time.com/5859452/oakland-school-police/> [<https://perma.cc/K768-MZZG>]; Sophie Quinton, *Denver School Board Votes to Remove Police From Schools*, STATELINE (June 12, 2020, 12:00 AM), <https://stateline.org/2020/06/12/denver-school-board-votes-to-remove-police-from-schools/> [<https://perma.cc/G99Y-UBD7>]; Harrington, *supra* note 216.

Los Angeles.<sup>236</sup> This is an opportunity to move the LAUSD away from the long history of racial disparities in school policing faced by Black students. This is an opportunity to avoid policing Black students for low-level offenses. This is an opportunity to increase funding for community-based alternatives that are independent from law enforcement.

#### B. REALIGNING THE ROLE OF SCHOOL POLICE OFFICERS

My final proposal urges scholars and leaders to reassess the roles and responsibilities of police officers in schools and communities. We ought to redefine their roles by examining their historical origins and offer fresh perspectives on a new set of functions and responsibilities. If school police officers do not make schools and communities safer for all students, what is left of school police officers' roles and responsibilities? I argue we should realign the role of school police officers with the historic role of protecting school property.

The Los Angeles School Police Department dates to 1948, when the district developed its own school security unit designed to patrol campuses for property protection.<sup>237</sup> LASPD's role on school campuses escalated in 1969 in explicit response to the Watts Uprising and federal law enforcement efforts to control future student violence and crime.<sup>238</sup> During this period, a growing number of student-led social movements against discrimination and school segregation occurred in majority-Black schools, demanding educational equity regarding culturally relevant curriculums and schools.<sup>239</sup> Many scholars have documented that direct action from law enforcement was often the response to these acts of organizing and social justice.<sup>240</sup> Research also notes that the various programs implemented by the city sought to repress organizing in Black schools.<sup>241</sup> An example was a program called Police Role in Government, piloted in 1969.<sup>242</sup> Taught by officers of the Los Angeles Police Department (LAPD), a major tenet of this program was to provide students with educational enforcement skills on how to become "proper citizens . . . docile and subservient."<sup>243</sup> The implementation of the program throughout many Black schools in Los Angeles reduced instructional time and placed the locus of blame on Black individual and cultural failure and emphasized correction of or fixing the behavior of urban Black students.<sup>244</sup> The presence of school police officers in Los Angeles, however, continued to expand to all schools and communities, not just those that comprised a high proportion of African-American students.<sup>245</sup>

236. Allen & Noguera, *supra* note 5, at 5–6.

237. ADVANCEMENT PROJECT & ALL. FOR EDUC. JUST., *supra* note 183, at 17.

238. Sojoyner, *supra* note 28, at 252.

239. ADVANCEMENT PROJECT & ALL. FOR EDUC. JUST., *supra* note 183, at 20.

240. *Id.* at 17.

241. Sojoyner, *supra* note 28, at 256.

242. *Id.* at 252.

243. SOJOYNER, *supra* note 23, at 126.

244. *Id.* at 61, 123–26.

245. See FREEMAN ET AL., *supra* note 3, at 9.

By 1987, LAUSD employed school police officers in every high school and two-thirds of middle schools.<sup>246</sup> During this time, the Drug Abuse and Resistance Education (DARE) program was piloted in many Los Angeles schools to teach classes and perform random security measures (that is, drug searches) on school campuses.<sup>247</sup> Furthering the relationship between law enforcement and LAUSD, the DARE program was accompanied by a truancy program in the early 1990s called Abolish Chronic Truancy (ACT). This new program provided the Los Angeles County District Attorney's office with oversight of disciplinary matters and concerns related to school absences.<sup>248</sup> Together, these programs created devastating consequences for the poorest, most vulnerable student population of Los Angeles County.<sup>249</sup> I argue that schools can and should reclaim officers' primary role for property protection. Schools can look to a structural policing approach as a model to determine what can be done and who (outside of law enforcement) can replace officers' roles as teachers, counselors, and mentors, among others.

### CONCLUSION

In places like Los Angeles, Black students in predominantly white schools and neighborhoods face racial incongruity, enduring stereotypes of criminality that justify multiple pathways to policing. School policing disproportionately targets the "select few" Black students in white spaces, creating a racialized web of vulnerability and stereotypes.

This is not school safety driving policing—it appears driven by law enforcement's purpose of racial subordination, with school police officers taking on roles beyond law enforcement, including educating and mentoring students deemed to be "at-risk."<sup>250</sup> These activities often give the impression that school police officers are present to help and care for Black students rather than posing as a threat to them, their futures, and overall school safety.<sup>251</sup>

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246. Internal Report, Lab. Cmty. Strategy Ctr., Labor/Community Strategy Center LA Educational Racism Timeline (Nov. 21, 2019) (on file with author).

247. SOJOYNER, *supra* note 23, at 86–87.

248. *Id.* at 75–77.

249. *Id.* at 84–85, 87.

250. See, e.g., Christine E. Sleeter, *Foreword* to CHILDREN AND FAMILIES "AT PROMISE": DECONSTRUCTING THE DISCOURSE OF RISK, at ix (Beth Blue Swadener & Sally Lubeck eds., 1995) (critiquing "[t]he discourse over 'children at risk'" that "attempts to frame such children and their families as lacking the cultural and moral resources for success in a presumed fair and open society and as in need of compensatory help from the dominant society"); Fedders, *supra* note 177, at 1485 ("Critics of 'at risk' terminology in the education and social-work realms argue that the phrase suggests a problematic determinism that fails to account for resiliency factors in young people.").

251. See Emily G. Owens, *Testing the School-to-Prison Pipeline*, 36 J. POL'Y ANALYSIS & MGMT. 11, 16, 34 (2017); see also MAURICE "MO" CANADY, BERNARD JAMES & JANET NEASE, NAT'L ASS'N OF SCH. RES. OFFICERS, TO PROTECT & EDUCATE: THE SCHOOL RESOURCE OFFICER AND THE PREVENTION OF VIOLENCE IN SCHOOLS 22–23 (2012) (noting that school police are expected to, among other obligations, "[d]evelop[] intervention, skills-development, and healthy-lifestyle programs for elementary and middle-school students so they are prepared to succeed in high school"; "[i]mplement[] a 'Doing the Right Thing' program where educators select one student each month for lunch with the SRO and a photo in the local paper in recognition of their leadership skills"; and "[c]onduct[]

The lack of sensible policies and laws contributes to the commonsense criminalization and policing of Black students, rooted in structural racism. Reexamining school policing requires acknowledging the powerful role of school police departments and addressing racial and spatial forces shaping police–student interactions in white spaces.

The persistently high rates of school policing of Black students reflect social inequality ingrained in America’s historical investment in protecting whiteness. Understanding these structural mechanisms calls for future research on Black students’ unequal experiences with school policing. Future research should further explore police presence in predominantly white schools and neighborhoods, considering the perspectives of teachers, school police officers, and parents, along with legal and policy implications. Addressing larger structural issues is crucial, and while interventions can curb discretionary enforcement methods, tackling the root causes necessitates prioritizing community recommendations to remove police from schools or significantly reduce their budgets. This raises the question of whether community discussions on the role of police in schools should focus on reform efforts that reimagine policing through community-based alternatives or abolishing policing entirely through addressing issues of school governance that rely on carceral practices.

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intervention programs for the purpose of counseling victims and friends of victims of campus violence”).

## APPENDICES

## APPENDIX A

<b>Highest Rates of Arrested and Cited Black Boys by the Los Angeles School Police Department (LASPD), Population of Black Boys, Rate of Black Male Student Involvement by Zip Code: 2014–2017</b>				
<b>Zip Code</b>	<b>Corresponding Neighborhood</b>	<b>Number of Student Arrests, Citations, and Diversions</b>	<b>Population of Black Boys</b>	<b>% of Arrested, Cited Black Boys per Black Male Student Population</b>
90272	Pacific Palisades	11	9	122.22%
90058	Vernon	17	26	65.38%
90046	Hollywood Hills West	32	50	64.00%
90049	Brentwood	9	26	34.62%
90066	Mar Vista	37	110	33.64%



APPENDIX B

Highest Rates of Arrested and Cited Black Girls by the Los Angeles School Police Department (LASPD), Population of Black Girls, Rate of Black Female Student Involvement by Zip Code: 2014–2017				
Zip Code	Corresponding Neighborhood	Number of Student Arrests, Citations, and Diversions	Population of Black Girls	% of Arrested, Cited Black Girls per Black Female Student Population
90058	Vernon	11	41	26.83%
90066	Mar Vista	20	103	19.42%
90028	Hollywood	9	57	15.79%
90046	Hollywood Hills West	7	45	15.56%
90272	Pacific Palisades	2	16	12.50%

APPENDIX C

Demographic Characteristics of Neighborhoods with Corresponding Rates of Arrested Black Boys and Girls by the Los Angeles School Police Department (LASPD) by Zip Code: 2014–2017						
Zip Code	Corresponding Neighborhood	Race/Ethnicity of Neighborhood <sup>252</sup>	Median Household Income of Neighborhood (and scale for L.A. County) <sup>253</sup>	% of Residents 25 Years and Older with Four-Year Degree (and scale for L.A. County) <sup>254</sup>	% of Arrested, Cited Black Boys per Black Male Student Population <sup>255</sup>	% of Arrested, Cited Black Girls per Black Female Student Population <sup>256</sup>
90272	Pacific Palisades	Black (0.4%) Latinx (3.2%) White (88.6%) Asian (5.5%) Other (2.3%)	\$168,009 (High)	70.9% (High)	122.22%	12.50%
90058	Vernon	Black (0.0%) Latinx (92.6%) White (2.1%) Asian (0.0%) Other (5.3%)	\$81,279 (High)	18.2% (Average)	65.38%	26.83%
90046	Hollywood Hills West	Black (2.7%) Latinx (5.8%) White (84.9%) Asian (3.9%) Other (2.7%)	\$108,199 (High)	58.8% (High)	64.00%	15.56%
90066	Mar Vista	Black (3.5%) Latinx (29.1%) White (51.3%) Asian (12.8%) Other (3.4%)	\$62,611 (Average)	42.3% (High)	33.64%	19.42%

252. *Mapping L.A. Neighborhoods*, *supra* note 87.

253. *Id.*

254. *Id.*

255. *See supra* [Appendix A](#).

256. *See supra* [Appendix B](#).