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## Racial Reckoning and the Police-Free Schools Movement

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### ABSTRACT

Across the country, students of color face daily threats of arrest, exclusion, and violence at the hands of school police officers. Whether deemed threatening, defiant, or hypersexualized, Black students, in particular, pay a heavy price to access their right to free public education. Despite victories in dismantling educational carcerality since the mid-2000s, efforts to formally remove police from public schools has been limited. However, during the 2020 racial reckonings, political opportunity catalyzed social movement campaigns, resulting in the passage of sixty-nine police-free policies. This represented an inflection point for civil rights, education justice, and police abolition scholars and activists. This Essay is the first to introduce a national accounting of the implementation of these policies, providing an essential contribution to scholarship and serving as a touchstone for future sociolegal analysis of the relationship between contestation and structural reforms.

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## INTRODUCTION

Legal scholarship has long centered on interrogations of structures of segregation, control, and punishment in American public education.<sup>1</sup> Most fundamentally, this work has established a record of the infusion and diffusion of carcerality across political, social, and jurisprudential spaces to maintain “expectations of power and control that enshrine the status quo as a neutral baseline . . . masking the maintenance of white privilege and domination.”<sup>2</sup> Punishment and control in U.S. public education have continually adopted new forms since their initial formulations, such as the denial of education to enslaved people of color,<sup>3</sup> forced attendance by Indigenous children at residential schools,<sup>4</sup>

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1. See generally Amity L. Noltemeyer, Julie Mujic & Caven S. McLoughlin, *The History of Inequity in Education*, in *DISPROPORTIONALITY IN EDUCATION AND SPECIAL EDUCATION* 3 (Amity Lynn Noltemeyer & Caven S. McLoughlin eds., 2012); Terence Fitzgerald, *Control, Punish, and Conquer: U.S. Public Schools’ Attempts to Control Black Males*, 12 *CHALLENGE* 1 (2006); Clayton Pierce, *W.E.B. Du Bois and Caste Education: Racial Capitalist Schooling From Reconstruction to Jim Crow*, 54 *AM. EDUC. RSCH. J.* 23S, 38S (2017) (emphasis omitted) (describing W.E.B. Dubois’s description of ‘caste education,’ noting that the education provided to Black children was designed to create a labor class, not a class of intellectuals or a class of freemen knowing of or advocating for real freedom and “[a] fundamental goal of caste schooling is the need to teach individuals from both the white and dark worlds how to understand and live as caste subjects as well as the value of social life attached to each.”); see, e.g., Nat’l Indian Youth Council, *Intermountain Indian Sch.* Chapter v. Bruce, 485 F.2d 97 (10th Cir. 1973).
  2. Cheryl I. Harris, *Whiteness as Property*, 106 *HARV. L. REV.* 1707, 1715 (1993); see also Erika K. Wilson, *The Legal Foundations of White Supremacy*, 11 *DEPAUL J. FOR SOC. JUST.* 1, 7 (2018) (describing race-conscious laws and the foundations of white supremacy); Michael J. Dumas, *Against the Dark: Antiblackness in Education Policy and Discourse*, 55 *THEORY INTO PRAC.* 11, 17 (2016) (arguing “any racial disparity in education should be assumed to be facilitated, or at least exacerbated, by disdain and disregard for the Black . . . . [t]hat is to say, these are all policies in which the Black is positioned on the bottom”).
  3. Noltemeyer et al., *supra* note 1, at 5; Fitzgerald, *supra* note 1, at 39.
  4. Noltemeyer et al., *supra* note 1, at 3–4, 9; Ann Murray Haag, *The Indian Boarding School Era and Its Continuing Impact on Tribal Families and the Provision of Government Services*, 43 *TULSA L. REV.* 149, 150–54 (2007).

the infusion of eugenics into education policy,<sup>5</sup> and decades of Jim Crow laws.<sup>6</sup> As is argued in other work,<sup>7</sup> the present-day regimes of school policing and discipline evolved under the banner of public safety and necessity<sup>8</sup> during and after the civil rights movement.<sup>9</sup>

Oppositional challenges to the interlocking regimes of policing and discipline have long existed.<sup>10</sup> In the 2000s, a novel educational justice movement challenged the school-to-prison pipeline by linking litigation, reformist and abolitionist agendas, and youth justice coalitions with empirical research.<sup>11</sup> Attention and responsiveness to disparities in school climate, policing,

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5. See Ruth Jones, *Eugenics in Education Policy and the Impact on African American Students* (May 16, 2019) (Master's Thesis, University of San Francisco), <https://repository.usfca.edu/cgi/viewcontent.cgi?article=2286&context=theses> [<https://perma.cc/K93U-PMN2>]; John Rosales & Tim Walker, *The Racist Beginnings of Standardized Testing*, NEATODAY (Mar. 20, 2021), <https://www.nea.org/advocating-for-change/new-from-nea/racist-beginnings-standardized-testing> [<https://perma.cc/XLQ3-LLPH>] (by 1918 there were more than one hundred standardized tests used as instrumentalities of racism and exclusion); Alan Stoskepf, *The Forgotten History of Eugenics*, RETHINKING SCHS., <https://rethinkingschools.org/articles/the-forgotten-history-of-eugenics> [<https://perma.cc/BG2G-52EB>] (“Eugenics became a top-down model of ‘education reform . . . .”).
  6. See *Cumming v. Richmond Cnty. Bd. of Educ.*, 175 U.S. 528, 545 (1899) (ruling a county Board of Education did not violate the Constitution when it closed the county’s only Black high school); *Gong Lum v. Rice*, 275 U.S. 78 (1927) (affirming that a Chinese-American student could be legally denied access to a white school because she was not white); *Missouri ex rel. Gaines v. Canada*, 305 U.S. 337, 351 (1938) (holding that the State of Missouri was required to provide facilities for public legal education for Black students “substantially equal to those which the State there afforded for persons of the white race”).
  7. Thalia González & Will Martel, *Education Equity and Brown: Reform, Retrenchment, and Exclusionary School Discipline*, GEO. J.L. & MOD. CRITICAL RACE PERSPS. (forthcoming 2024).
  8. See, e.g., FED. COMM’N ON SCH. SAFETY, FINAL REPORT OF THE FEDERAL COMMISSION ON SCHOOL SAFETY 14, 67–72, 101–06 (2018), <https://www2.ed.gov/documents/school-safety/school-safety-report.pdf> [<https://perma.cc/HTS8-3J3W>]; MARJORY STONEMAN DOUGLAS HIGH SCH. PUB. SAFETY COMM’N, REPORT SUBMITTED TO THE GOVERNOR, SPEAKER OF THE HOUSE OF REPRESENTATIVES AND SENATE PRESIDENT 87–94 (2019), <https://www.fdle.state.fl.us/MSDHS/CommissionReport.pdf> [<https://perma.cc/H8SX-2CNW>].
  9. Angela P. Harris, *Equality Trouble: Sameness and Difference in Twentieth-Century Race Law*, 88 CALIF. L. REV. 1923, 1982–83 (2000) (characterizing the Second Reconstruction and the “political and legal upheaval in race relations” which ushered in “clash between the recognition of racism and the desire to maintain privileges and entitlements formerly claimed in the name of whiteness”).
  10. *Infra* Part I.
  11. See, e.g., AARON KUPCHIK, HOMEROOM SECURITY: SCHOOL DISCIPLINE IN AN AGE OF FEAR (2010); DANIEL J. LOSEN & RUSSELL J. SKIBA, S. POVERTY L. CTR., SUSPENDED EDUCATION: URBAN MIDDLE SCHOOLS IN CRISIS 11 (2010), [http://www.splcenter.org/sites/default/files/downloads/publication/Suspended Education.pdf](http://www.splcenter.org/sites/default/files/downloads/publication/Suspended%20Education.pdf) [<https://perma.cc/6ZAA-332N>]; Am. Psych. Ass’n Zero Tolerance Task Force, *Are Zero Tolerance Policies Effective in the Schools?: An Evidentiary Review and Recommendations*, 63 AM. PSYCH. 852, 852–62 (2008); SARAH E. REDFIELD & JASON

and discipline acutely focused on the harsh realities faced by Black boys.<sup>12</sup> But the multiplicity of harms rooted in the interplay of carceral norms and intersectional bias experienced by Black girls in schools, especially in the context of policing and discipline, remain largely overlooked.<sup>13</sup>

These harms are documented in both data and media accounts. National school discipline data and analysis in 2020 show Black girls were 3.66 times more likely than their white peers to be arrested, 5.34 times more likely to be transferred from their school, 3.66 times more likely to be expelled, and 2.17 times more likely to be physically restrained.<sup>14</sup> The U.S. Department of Education's Civil Rights Data Collection dataset collected before COVID-19 school closures showed that Black girls were overrepresented in school suspensions.<sup>15</sup> Media accounts of Black girls' experiences in public schools bring intersectional reality into full relief: four middle school Black girls were strip-searched, for example,

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P. NANCE, A.B.A., SCHOOL-TO-PRISON PIPELINE, PRELIMINARY REPORT (2016), [https://www.americanbar.org/content/dam/aba/publications/criminaljustice/school\\_to\\_prison\\_pipeline\\_report.pdf](https://www.americanbar.org/content/dam/aba/publications/criminaljustice/school_to_prison_pipeline_report.pdf) [<https://perma.cc/TA3U-BHA6>].

12. See Jason P. Nance, *Dismantling the School-to-Prison Pipeline: Tools for Change*, 48 ARIZ. ST. L.J. 313, 319–24, 331–33 (2016) (describing the consequences of incarcerating, arresting, and excluding youth from school); Edward W. Morris & Brea L. Perry, *The Punishment Gap: School Suspension and Racial Disparities in Achievement*, 63 SOC. PROBLEMS 68, 75–81 (2016); Matthew C. Fadus et al., *Racial Disparities in Elementary School Disciplinary Actions*, 60 J. AM. ACAD. CHILD & ADOLESCENT PSYCH. 998, 1000–07 (2021); see also MY BROTHER'S KEEPER: 2016 PROGRESS REPORT (2016) (regarding a presidential initiative established to protect and uplift boys and young men of color in the wake of Trayvon Martin's death).
13. See, e.g., *My Brother's Keeper Alliance*, OBAMA FOUND., <https://www.obama.org/my-brothers-keeper-alliance/about> [<https://perma.cc/G3ZY-P2C8>] (describing the organizational mission to “make safe and supportive communities a reality for all of our nation's boys and young men of color”). The invisibility of Black women and girls has been a constant even within civil rights movements. See Loy Azalia & Ciara Mackey-Hall, *Breonna Taylor and the Invisibility of Black Women and Girls in America*, CHILD.'S DEF. FUND (Sept. 28, 2020), <https://www.childrensdefense.org/blog/breonna-taylor-and-the-invisibility-of-black-women-and-girls-in-america> [<https://perma.cc/9VYH-2SC7>].
14. REBECCA EPSTEIN, ERIN GODFREY, THALIA GONZÁLEZ & SHABNAM JAVDANI, GEO. L. CTR. ON POVERTY INEQ. & JUST. ET AL., DATA SNAPSHOT: 2017–2018 NATIONAL DATA ON SCHOOL DISCIPLINE BY RACE AND GENDER (2018), <https://genderjusticeandopportunity.georgetown.edu/wp-content/uploads/2021/04/National-Data-on-School-Discipline-by-Race-and-Gender.pdf> [<https://perma.cc/Y38M-GMVA>].
15. U.S. DEP'T OF EDUC., OFF. OF C.R., 2020–21 CIVIL RIGHTS DATA COLLECTION: SCHOOL DISCIPLINE AND SCHOOL CLIMATE IN U.S. PUBLIC SCHOOLS (2023) 7, <https://www2.ed.gov/about/offices/list/ocr/docs/crdc-discipline-school-climate-report.pdf> [<https://perma.cc/BC75-4LX2>].

because they were perceived as “hyper and giddy,”<sup>16</sup> and a six-year-old Black girl was arrested for taking candy from a teacher’s desk.<sup>17</sup> Simply put, the ongoing dynamics of racialized and gendered power, expressed through threats of police violence and arrest, have divested students of color of their educational futures—uniquely so for Black girls—by subjecting them to disproportionate and unjust surveillance and punishment.<sup>18</sup> Yet despite the “enduring nature of anti-Black racism, sexism, classism, and heteropatriarchy,”<sup>19</sup> Black girls are too often invisible in research, advocacy, and discourse.<sup>20</sup>

This Essay, and the larger project of the Center on Gender Justice & Opportunity at Georgetown Law<sup>21</sup> in which it is positioned, reflects our unwavering commitment to elevating intersectionality<sup>22</sup> as central to education equity and justice. This piece, however, does not attempt to present a normative,

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16. Michael Gold, *After Report of Four Girls Strip-Searched at School, Cuomo Calls for Inquiry*, N.Y. TIMES (Jan. 30, 2019), <https://www.nytimes.com/2019/01/30/nyregion/inghamton-school-strip-search.html> [<https://perma.cc/U6GH-P4HR>].
  17. Antoaneta Roussi, *Six-Year-Old Girl in Chicago Handcuffed for Allegedly Stealing Candy From a Teacher*, SALON (Mar. 21, 2016, 6:57 PM), [https://www.salon.com/2016/03/21/six\\_year\\_old\\_girl\\_in\\_chicago\\_handcuffed\\_for\\_allegedly\\_stealing\\_candy\\_from\\_a\\_teacher/](https://www.salon.com/2016/03/21/six_year_old_girl_in_chicago_handcuffed_for_allegedly_stealing_candy_from_a_teacher/) [<https://perma.cc/E666-G6YJ>].
  18. MONIQUE W. MORRIS, PUSHOUT: THE CRIMINALIZATION OF BLACK GIRLS IN SCHOOLS 34–36 (2016); ADAKU ONYEKA-CRAWFORD, KAYLA PATRICK & NEENA CHAUDHRY, STOPPING SCHOOL PUSHOUT FOR GIRLS OF COLOR 3, 13–15 (2017); *see also* Connie Wun, *Against Captivity: Black Girls and School Discipline Policies in the Afterlife of Slavery*, 30 EDUC. POL’Y 171, 173, 179 (2016).
  19. Charity Brown Griffin, Jamelia N. Harris & Sherrie L. Proctor, *Intersectionality and School Racial Climate to Create Schools as Sites of Fairness and Liberation for Black Girls*, 104 J. SCH. PSYCH. 1 (2024).
  20. For example, the #SayHerName Campaign was founded in 2014 to elevate “awareness to the often invisible names and stories of Black women and girls who have been victimized by racist police violence, and provides support to their families.” #SayHerName, AFR. AM. POL’Y F., <https://www.aapf.org/sayhername> [<https://perma.cc/UW9R-PFW4>]; *see generally* Shawn Arango Ricks, *Falling Through the Cracks: Black Girls and Education*, 4 INTERDISC. J. TEACHING & LEARNING 10 (2014); Chayla Haynes, Saran Stewart & Evette Allen, *Three Paths, One Struggle: Black Women and Girls Battling Invisibility in U.S. Classrooms*, 85 J. NEGRO EDUC. 380 (2016).
  21. *See Education & Pushout*, CTR. ON GENDER JUST. & OPPORTUNITY, <https://genderjusticeandopportunity.georgetown.edu/focus-areas/education-pushout> [<https://perma.cc/NRS4-J8BH>].
  22. Kimberlé Crenshaw, *Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Politics*, 1989 U. CHI. LEGAL F. 139, 149 (1989) (defining intersectionality through the lens of Black women’s experiences: “they experience double-discrimination—the combined effects of practices which discriminate on the basis of race, and on the basis of sex”); Brown Griffin et al., *supra* note 19, at 2 (citing Patricia Collins in defining intersectionality “in terms of a matrix of domination that functions as a heuristic tool for analyzing and developing solutions in response to Black women oppression”).

descriptive, or prescriptive interrogation of the full scope of the school-to-prison pipeline or the deleterious impact of school police or school resource officers (SROs) on Black girls and students of color more broadly.<sup>23</sup> Instead, it aims to intervene in the interstice between scholarship<sup>24</sup> and advocacy<sup>25</sup> that champion “freedom dreams”<sup>26</sup> for public education.

The transformative potential of freedom dreams and the political opportunity structures<sup>27</sup> that can make them a reality were brought into sharp relief in the wake of the “racial reckoning” of 2020,<sup>28</sup> when education justice activists exerted increased pressure at local and national levels to end entrenched

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23. We use the terms “school police” and “school resource officers” in this Essay, as both are commonplace in academic literature. See, e.g., Barbara A. Fedders, *The End of School Policing*, 109 CALIF. L. REV. 1443, 1451–54 (2021); Jason P. Nance & Michael Heise, *Law Enforcement Officers, Students, and the School-to-Prison Pipeline*, 54 ARIZ. ST. L.J. 527, 541–47 (2022); MEGAN FRENCH-MARCELIN & SARAH HINGER, ACLU, BULLIES IN BLUE: THE ORIGINS AND CONSEQUENCES OF SCHOOL POLICING 2, 4 (2017), [https://assets.aclu.org/live/uploads/publications/aclu\\_bullies\\_in\\_blue\\_4\\_11\\_17\\_final.pdf](https://assets.aclu.org/live/uploads/publications/aclu_bullies_in_blue_4_11_17_final.pdf) [<https://perma.cc/YZB3-8BVQ>].
  24. See, e.g., Helen Hershkoff & Nathan Yaffe, *Unequal Liberty and a Right to Education*, 43 N.C. CENT. L. REV. 1, 4–6 (2020); Sophie Rudolph, *Carceral Logics and Education*, 64 CRITICAL STUDIES IN EDUC. 392, 392–409 (2023); see also Mariame Kaba & Erica R. Meiners, *Arresting the Carceral State*, JACOBIN (Feb. 24, 2014), <https://www.jacobinmag.com/2014/02/arresting-the-carceral-state> [<https://perma.cc/KPR6-FABB>]; CHARLENE A. CARRUTHERS, UNAPOLOGETIC: A BLACK, QUEER, AND FEMINIST MANDATE FOR RADICAL MOVEMENTS *passim* (2018).
  25. See *infra* Part II.
  26. See generally ROBIN D.G. KELLEY, FREEDOM DREAMS: THE BLACK RADICAL IMAGINATION (2022) (discussing the history and development of “freedom dreams” of Black radical intellectuals).
  27. Political opportunity structures are external conditions where social movements and mobilization may emerge and political action and activism may occur. David S. Meyer, *Protest and Political Opportunities*, 30 ANN. REV. SOCIO. 125, 126 (2004) (describing political opportunity structures as defining “activists’ prospects for advancing particular claims, mobilizing supporters, and affecting influence [as] context-dependent”).
  28. In 2021, thirteen of the top U.S. law reviews collectively contributed to a collection of published essays, *Reckoning and Reformation: Reflections and Legal Responses to Racial Subordination and Structural Marginalization. 2021 Symposium: Policing, Race, and Power*, STAN. L. REV. SYMPOSIA, <https://www.stanfordlawreview.org/symposium/policing-race-and-power> [<https://perma.cc/WSQ4-NNUE>]. See also Elliott C. McLaughlin, *How George Floyd’s Death Ignited a Racial Reckoning That Shows No Signs of Slowing Down*, CNN (Aug. 9, 2020, 11:31 AM), <https://www.cnn.com/2020/08/09/us/george-floyd-protests-different-why/index.html> [<https://perma.cc/RC6G-WMCM>]; *America’s Racial Reckoning*, NBC NEWS, <https://www.nbcnews.com/americas-racial-reckoning> (last visited Aug. 10, 2024) (cataloging various news stories on “protests, boycotts and the fight against systemic racism that is reverberating around the country”); Ailsa Chang, Rachel Martin & Eric Marrapodi, *Summer of Racial Reckoning*, NPR (Aug. 16, 2020, 9:00 AM), <https://www.npr.org/2020/08/16/902179773/summer-of-racial-reckoning-the-match-lit> [<https://perma.cc/4TD3-VQCA>].

carceral conditions and policing practices in public schools.<sup>29</sup> School districts across the country began to pass police-free school policies<sup>30</sup> for the first time in June 2020.<sup>31</sup> Despite the significance of the enactment of these policies for civil rights, education justice, and police abolition, no scholarship has presented national data on police-free school policies passed between 2020 and 2023. To address this gap in legal scholarship, this Essay proceeds in two parts. Part I sets forth a brief background of the institutional and ideological genesis of police in public schools and the rise of individual and collective resistances to punitive control and racialized violence against students. Part II presents an analysis of data collected from the sixty-nine school districts that passed police-free school policies between June 2020 and June 2023. We conclude with a reflection on current implementation challenges and the future of these policies.

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29. See, e.g., #POLICEFREESCHS., <https://policefreeschools.org> [<https://perma.cc/66MJ-YJAG>] (describing National Campaign for Police Free Schools); BLACK ORG. PROJECT, THE PEOPLE'S PLAN FOR POLICE FREE-SCHOOLS (2019), <https://blackorganizingproject.org/wp-content/uploads/2021/07/The-Peoples-Plan-2019-Online-Reduced-Size.pdf> [<https://perma.cc/E2GW-RFFB>]; SAFE SCHS. L.A., <https://www.safeschoolslausd.com> [<https://perma.cc/V8SV-END3>]; *Chicago Students Demand #PoliceFreeSchools, #COPSOUTCPS*, <https://copsoutcps.com> [<https://perma.cc/NB3N-DMZS>]; see also Moriah Balingit, Valerie Strauss & Kim Bellware, *Fueled by Protests, School Districts Across the Country Cut Ties With Police*, WASH. POST (June 12, 2020, 11:06 AM), <https://www.washingtonpost.com/education/2020/06/12/schools-police-george-floyd-protests> [<https://perma.cc/Q56H-S4UZ>]. We recognize that the work of youth organizers and abolitionists seeking to end police and policing practice in schools predates 2020. In particular, this includes the work of Critical Resistance founded by Angela Davis, Ruth Wilson Gilmore, Dylan Rodriguez, and Rachel Herzing. See *History*, CRITICAL RESISTANCE, <https://criticalresistance.org/mission-vision/history/> [<https://perma.cc/YGZ6-YZC4>]; *Angela Davis Speaks at Critical Resistance Meeting About the Prison Industrial Complex*, HARV. RADCLIFFE INST. (June 17, 2020), <https://www.radcliffe.harvard.edu/news-and-ideas/angela-davis-speaks-at-critical-resistance-meeting-about-the-prison-industrial-complex> [<https://perma.cc/4PMA-7H3W>]; *The Economy of Incarceration: Ruth Wilson Gilmore*, CRITICAL RESISTANCE (May 26, 2015), <https://criticalresistance.org/in-the-news/the-economy-of-incarceration-ruth-wilson-gilmore> (play the video interview with Ruth Wilson Gilmore) We simultaneously acknowledge the recent and significant rise in calls for removing school police amidst a national attention on police violence against Black people. *Who Got Next?!: National Week of Action for #PoliceFreeSchools June 22-27, 2020*, NAT'L WEEK OF ACTION, <https://sites.google.com/view/policefreeschools/home> [<https://perma.cc/EB9M-KBL6>].

30. We use the following terms interchangeably in this Essay given the state of the field and their usage: police-free policies, police-free school policies, school police policies, and school-police policies.

31. Note: This finding comes from our original research.



## I. ORGANIZING FOR POLICE-FREE SCHOOLS

In 1953, on the eve of the United States Supreme Court's decision in *Brown v. Board of Education*<sup>32</sup>, the first school police officers were permanently assigned to public schools in Flint, Michigan.<sup>33</sup> Aided by favorable media coverage,<sup>34</sup> school police presence proliferated across the country during the 1960s and 1970s.<sup>35</sup> By 1972, forty states had introduced police into urban school districts.<sup>36</sup> In a parallel trend, states also began passing more laws that criminalized student behavior on campus; raising the stakes of the presence of school police who could now arrest students for behavior that formerly sent students to the principal's office.<sup>37</sup>

Against this background, school campuses became sites of contestation for racial justice during the desegregation movement of the 1950s and 1960s.<sup>38</sup> As state and local governments employed law enforcement to resist desegregation<sup>39</sup> and suppress student demonstrations,<sup>40</sup> students and advocacy groups began to

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32. 347 U.S. 483 (1954).

33. MICHELLE MBEKEANI-WILEY, SHRIVER CTR., *HANDCUFFS IN HALLWAYS: THE STATE OF POLICING IN CHICAGO PUBLIC SCHOOLS 7* (2017), <https://www.povertylaw.org/wp-content/uploads/2019/08/handcuffs-in-hallways-final.pdf> [<https://perma.cc/6TKS-GDHS>].

34. See ADVANCEMENT PROJECT & ALL. FOR EDUC. JUST., *WE CAME TO LEARN: A CALL TO ACTION FOR POLICE-FREE SCHOOLS 20* (2018), <https://advancementproject.org/wp-content/uploads/WCTLweb/index.html#page=1> [<https://perma.cc/T47B-GC4E>].

35. Tucson led the way in 1966, assigning officers to six junior high school campuses. ADVANCEMENT PROJECT & ALL. FOR EDUC. JUST., *HISTORY OF SCHOOL POLICING & THE SCHOOL TO PRISON PIPELINE MOVEMENT: PART 1* (2021), [https://policefreeschools.org/wp-content/uploads/2021/10/The-History-of-School-Policing-The-School-to-Prison-Pipeline-Movement\\_Part-1.pdf](https://policefreeschools.org/wp-content/uploads/2021/10/The-History-of-School-Policing-The-School-to-Prison-Pipeline-Movement_Part-1.pdf) [<https://perma.cc/LWE9-RZ9D>]. In 1967, Baltimore established a school security force consisting of twenty-five officers. *Id.* The same year, police in Washington, D.C. began random “check-ins” at 136 elementary schools. *Id.* New York City stationed over 200 school security guards in public schools in 1969, and Chicago began sending plainclothes officers into schools in 1970. *Id.*

36. *Id.*

37. About ten years after Baltimore established its twenty-five-officer school security force, Maryland passed a law criminalizing the disruption of school activities. MD. CODE ANN., EDUC. § 26-101 (West 2024) (originally enacted as Acts 1978, Ch. 22 § 2).

38. ADVANCEMENT PROJECT ET AL., *supra* note 34, at 17–18.

39. In 1957, the Arkansas Governor infamously ordered the National Guard to prevent the Little Rock Nine from attending a White-only school. *Id.* at 20.

40. In 1967 and 1968, police beat and arrested hundreds of the nearly 20,000 students who walked out of their schools in Philadelphia and Los Angeles in demand of racial justice for Black and Chicano students. Ron Whitehorne, *1967: African American Students Strike, Survive Police Riot to Force Change*, CHALKBEAT: PHILA. (Sept. 25, 2002, 6:31 AM), <https://www.chalkbeat.org/philadelphia/2002/9/25/22185400/1967-african-american-students-strike-survive-police-riot-to-force-change> [<https://perma.cc/WLX7-Y2G3>]; Kelly Simpson, *East L.A. Blowouts: Walking Out for Justice in the Classrooms*,

protest police presence on school campuses, in particular.<sup>41</sup> In 1971, a group of students in Boston that equaled more than half of the city's Black student enrollment boycotted the public schools.<sup>42</sup> Among their demands was “the removal of police from schools,” marking perhaps the first time a group explicitly made such a demand.<sup>43</sup> These efforts met with limited success. With the rise of zero-tolerance policies<sup>44</sup> and a dramatically increased police presence in public schools<sup>45</sup> during the 1990s and 2000s, campaigns against harsh and exclusionary punishment evolved as a top civil rights issue.<sup>46</sup> In 2000, three leading civil rights organizations—the Advancement Project, the Civil Rights Project at Harvard University, and the Rainbow/PUSH Coalition—convened a National Summit on Zero Tolerance<sup>47</sup> that culminated in a comprehensive report on the racial discrimination inherent in zero-tolerance and other similarly harsh school

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PBS SoCAL (Mar. 7, 2012), <https://www.pbssocal.org/shows/departures/east-l-a-blowouts-walking-out-for-justice-in-the-classrooms> [<https://perma.cc/GFZ5-KBJG>].

41. ADVANCEMENT PROJECT ET AL., *supra* note 34, at 20.

42. *Id.*

43. Tess Bundy, *Black Student Power in Boston*, BLACK PERSPS. (Aug. 13, 2018), <https://www.aaihs.org/black-student-power-in-boston-2> [<https://perma.cc/D8X6-VDJN>].

44. Federal law began to require a one-year expulsion for possessing a weapon in school, but some states went beyond, requiring automatic suspensions or expulsions for other offenses, such as drug possession. Jennifer Thomsen, *A Look at the History of School Safety Legislation in the Last Two Decades*, EDUC. COMM'N STATES (Aug. 12, 2019), <https://www.ecs.org/a-look-at-the-history-of-state-school-safety-legislation-in-the-last-2-decades> [<https://perma.cc/GBR9-83A3>].

45. In 1975, only one percent of school principals reported having police stationed in their school. Chongmin Na & Denise C. Gottfredson, *Police Officers in Schools: Effects on School Crime and the Processing of Offending Behaviors*, JUST. Q., Oct. 2011, at 619. By 1997, that percentage had risen to 22 percent, and, in 2007, 40 percent of principals reported having an officer stationed in their school. *Id.* By 2020, the number of School Resource Officers (SROs) had risen to 23,400. ELIZABETH J. DAVIS, U.S. DEP'T OF JUST., OFFICE OF JUST. PROGRAMS, SCHOOL RESOURCE OFFICERS, 2019–2020 1 (2023), <https://bjs.ojp.gov/document/sro1920.pdf> [<https://perma.cc/7P72-YFPD>].

46. See, e.g., JUDITH A. BROWNE, ADVANCEMENT PROJECT, *DERAILED: THE SCHOOLHOUSE TO JAILHOUSE TRACK* (2003), <https://static.prisonpolicy.org/scans/Derailepccor.pdf> [<https://perma.cc/X7LA-MUYG>]; ADVANCEMENT PROJECT ET AL., *EDUCATION ON LOCKDOWN: THE SCHOOLHOUSE TO JAILHOUSE TRACK* (2005), <https://static.prisonpolicy.org/scans/FINALEOLrep.pdf> [<https://perma.cc/85DK-6QSV>]; ADVANCEMENT PROJECT ET AL., *supra* note 35. See also Thalia González, *Keeping Kids in Schools: Restorative Justice, Punitive Discipline, and the School to Prison Pipeline*, 41 J.L. & EDUC. 281, 297–98 (2012) [hereinafter González, *Keeping Kids in Schools*]; Thalia González, *Restoring Justice: Community Organizing to Transform School Discipline Policies*, 15 U.C. DAVIS J. JUV. L. & POL'Y 1, 15–26 (2011) [hereinafter González, *Restoring Justice*].

47. ADVANCEMENT PROJECT ET AL., *supra* note 35.

disciplinary policies.<sup>48</sup> As the educational justice movement grew, early policy victories catalyzed local and national coalitions and legislative reform.<sup>49</sup>

Yet despite efforts to limit punitive practices and the adoption of restorative justice interventions,<sup>50</sup> school police programs proliferated during 1960s and 1970s<sup>51</sup> and episodes of school police violence continued, notably against girls of color. In Florida, for example, police officers arrested five-year-old Ja'eisha Scott in her classroom because she “threw a tantrum,”<sup>52</sup> sparking a national discourse about the school-to-prison pipeline in the 2000s and 2010s.<sup>53</sup> In

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48. See generally ADVANCEMENT PROJECT & C.R. PROJECT–HARV. UNIV., OPPORTUNITIES SUSPENDED: THE DEVASTATING CONSEQUENCES OF ZERO TOLERANCE AND SCHOOL DISCIPLINE (2000), <https://civilrightsproject.ucla.edu/research/k-12-education/school-discipline/opportunities-suspended-the-devastating-consequences-of-zero-tolerance-and-school-discipline-policies/crp-opportunities-suspended-zero-tolerance-2000.pdf> [https://perma.cc/4UGJ-5JMP].
49. In 2007, a parent and family-led movement pressured the Los Angeles Unified School District into becoming the first district to repeal zero-tolerance policies. POLICE-FREE LAUSD COAL., FROM CRIMINALIZATION TO EDUCATION: A COMMUNITY VISION FOR SAFE SCHOOLS IN LAUSD 16 (2022), <https://knock-la.com/wp-content/uploads/2023/02/The-Peoples-Plan-Police-Free-LAUSD-Coalition-Safe-Schools-LA-REPORT.pdf> [https://perma.cc/45L6-9K23]. See also S.B. 1147, 89th Gen. Assemb., Reg. Sess. (Ark. 2013) (codified as amended at ARK. CODE ANN. § 6-18-507(b)(1)) (limiting out-of-school suspension for truancy); A.B. 2537, 2012 Reg. Sess. (Cal. 2012) (codified at CAL. EDUC. CODE § 48915(a)) (restricting exclusionary school discipline for a variety of behaviors); H.B. 5826, Gen. Assemb., 2008 Reg. Sess. (Conn. 2008) (codified at CONN. GEN. STAT. § 10-233c(g)) (limiting the circumstances in which a student can be suspended).
50. González, *Keeping Kids in Schools*, *supra* note 46, at 305–21; see generally González, *Restoring Justice*, *supra* note 46.
51. Between 2018 and 2022, the Office of Community Oriented Policing Services (COPS) committed nearly \$233 million toward school police programs and other school security measures. U.S. DEP'T OF JUST., OFF. OF CMTY. ORIENTED POLICING SERVS., FACT SHEET: 2023 COPS OFFICE SCHOOL VIOLENCE PREVENTION PROGRAM (2023), [https://cops.usdoj.gov/pdf/2023AwardDocs/svpp/Post\\_Award\\_Fact\\_Sheet.pdf](https://cops.usdoj.gov/pdf/2023AwardDocs/svpp/Post_Award_Fact_Sheet.pdf) [https://perma.cc/XL23-SUDW]. In 2018, it was estimated that between 14,000 and 20,000 officers were stationed in schools. Jennifer Counts, Kristina N. Randall, Joseph B. Ryan & Antonis Katsiyannis, *School Resource Officers in Public Schools: A National Review*, 41 EDUC. & TREATMENT CHIL. 405, 406 (2018). By 2020, that number had risen to 23,400. DAVIS, *supra* note 45, at 1.
52. Lynette Holloway, *Shutting Down the School-to-Prison Pipeline*, ROOT (Nov. 8, 2013), <https://www.theroot.com/shutting-down-the-school-to-prison-pipeline-1790898782> [https://perma.cc/232T-LLKP].
53. This is not to suggest that there was an absence of local reforms or civil rights victories against policing violence in schools. For example, in 2017, Alliance for Educational Justice and Advancement Project partnered to combat police violence on campus. The same year, Puente Human Rights Movement campaigned for the removal of all officers from the Phoenix Union High School District. ADVANCEMENT PROJECT & ALL. FOR EDUC. JUST., HISTORY OF SCHOOL POLICING & THE SCHOOL TO PRISON PIPELINE MOVEMENT: PART 2 (2021), <https://policefreeschools.org/wp-content/uploads/2021/10/The-History-of-School->

2015, students catalyzed local action when they captured video footage of a school police officer dragging a Black girl in a South Carolina high school.<sup>54</sup> Incidents like these laid a critical foundation for future advocacy as organizations and youth-led networks collected data about the widespread abuse and violence that students experienced at the hands of school police.<sup>55</sup>

Despite the accumulating evidence of harm created by these intense incidents of police violence on campus,<sup>56</sup> as well as the anti-SRO efforts undertaken by community organizations,<sup>57</sup> nationwide demands to remove officers from schools remained episodic.<sup>58</sup> Although some large districts restricted specific policing practices,<sup>59</sup> including Denver Public Schools and Los Angeles Unified School District, the dominant national political discourse largely favored increasing the number of SROs in schools.<sup>60</sup> In 2018, Florida, among other states, passed new legislation and increased state budgets to expand surveillance and police presence<sup>61</sup>—ignoring the well-documented discriminatory, detrimental,

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Policing-The-School-to-Prison-Pipeline-Movement\_Part-2.pdf [https://perma.cc/2W2M-9VWT].

54. MARK R. WARREN, WILLFUL DEFIANCE: THE MOVEMENT TO DISMANTLE THE SCHOOL-TO-PRISON PIPELINE 212–13 (2022).

55. *Id.*

56. *See id.* at 216 (showing that the Alliance for Educational Justice recorded 145 episodes of police violence on school campuses by 2020).

57. *See* TYLER WHITTENBERG, RUSSELL SKIBA, BRITANY BEAUCHESNE & ANGELA GROVES, #ASSAULTATSPRINGVALLEY: AN ANALYSIS OF POLICE VIOLENCE AGAINST BLACK AND LATINE STUDENTS IN PUBLIC SCHOOLS 3 (2022), <https://policefreeschools.org/wp-content/uploads/2022/12/AP-AssaultAt-Report-V4-120922.pdf> [https://perma.cc/2RDB-7QEG].

58. *See* WARREN, *supra* note 54, at 219 (“[T]he movement was hampered in its early days by a lack of systemic data about the presence of police in schools and their interactions with students, including assaults and arrests.”).

59. ADVANCEMENT PROJECT ET AL., *supra* note 53. In Denver, Padres Y Jóvenes Unidos successfully pressured the school district in 2017 to pass a policy banning suspensions and expulsions from preschool to third grade. *Id.* As a result of the advocacy of several Los Angeles-based organizations—including a strike by United Teachers Los Angeles—the Los Angeles Unified School District agreed to a pilot program to end random searches at school. POLICE-FREE LAUSD COAL., *supra* note 49, at 18.

60. *See* ADVANCEMENT PROJECT ET AL., *supra* note 53.

61. In response to the shooting at Sandy Hook in 2012, President Obama initiated a program allocating \$150 million for school districts to hire police and counselors. Sarah Muller, *The Obama Administration Funds Police Officers in Schools*, NBC NEWS (Sept. 27, 2013, 6:46 PM), <https://www.nbcnews.com/id/wbna53128915> [https://perma.cc/6BE6-XGQU]. After the 2018 shooting at Marjory Stoneman Douglas High School, the U.S. House of Representatives allocated an additional \$50 million annually for increased school security and surveillance. John Parkinson, *House Passes STOP School Violence Act*, ABC NEWS (Mar. 14, 2018, 12:34 PM), <https://abcnews.go.com/Politics/house-passes-stop-school-violence-act/story?id=53749704> [https://perma.cc/6GMN-ZT74]. In the same vein, Florida passed

and long-term effects of police on Black and Latiné students and school communities.<sup>62</sup>

In 2020, however, the educational justice landscape profoundly shifted as sweeping protests and calls for racial reckoning disrupted the status quo. In this political moment, the police-free schools movement was catapulted into the national spotlight.<sup>63</sup> Formal policies, new campaigns, and coalitions emerged, including Black Lives Matter at School.<sup>64</sup> It was a moment of promise for those who fought to once again frame police presence in school as a civil rights issue. This Essay is intended to examine the long-term success of that moment.

## II. POLICE-FREE SCHOOL POLICIES: 2020–2023

To examine the police-free school policies born of the activism of 2020, we developed an original database that included media reports, public testimony, advocacy statements, public summaries, school board meeting minutes, draft resolutions, memoranda of understanding, formal policies, and policy amendments.<sup>65</sup> From that data, we identified more than eighty school districts that considered revisions to existing school police policies, and sixty-nine school districts that passed police-free school policies beginning in June 2020 (Appendix A, Table 1).

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laws requiring districts to place an armed officer in every school and allowing school employees to carry firearms. ADVANCEMENT PROJECT ET AL., *supra* note 53.

62. ADVANCEMENT PROJECT ET AL., *supra* note 53; see P.R. Lockhart, *Parkland's Black Students Say They're Being Forgotten in the Gun Control Debate*, VOX (Mar. 29, 2018, 6:50 PM), <https://www.vox.com/identities/2018/3/29/17177446/black-parkland-students-criticize-media-school-safety-discipline> [<https://perma.cc/A8PW-8QP8>].
63. WARREN, *supra* note 54, at 221; see ANDREA J. RITCHIE ET AL., *THE DEMAND IS STILL #DEFUNDTHEPOLICE* 3–6 (2021), <https://static1.squarespace.com/static/5ee39ec764dbd7179cf1243c/t/60806839979abc1b93aa8695/1619028044655/%23DefundThePolice%2BUpdate.pdf> [<https://perma.cc/5D83-PE5Z>]. Prior to 2020, no school district had passed police-free policies and by the end of 2021, sixty-eight had done so. WARREN, *supra* note 54, at 220 see also Nicole Gaudiano, *Police-Free Schools Movement Advances*, POLITICO (June 8, 2020, 10:00 AM), <https://www.politico.com/newsletters/morning-education/2020/06/08/police-free-schools-movement-advances-788320> [<https://perma.cc/UYW5-RJMD>].
64. *National Black Lives Matter at School*, BLACK LIVES MATTER AT SCH., <https://www.blacklivesmatteratschool.com> [<https://perma.cc/9HS9-VP7Y>].
65. Materials collected for the database were collected by a team of five research assistants with cross-analysis and coding by a minimum of two individuals. A broad inclusion criteria was created to include materials from school districts in which no formal policy action was taken. Following collection, data was sorted into categories and subcategories.

Of those sixty-nine school districts, approximately half ( $n = 36$ ) passed policies between June and August 2020. First-phase policy adopters included Oakland Unified School District (California), Portland Public Schools (Oregon), District of Columbia Public Schools, and Madison School District (Wisconsin). By December 2020, a total of forty-one geographically diverse districts had passed police-free policies. By mid-2021, twenty-three more school districts passed revised school police policies, and by the end of the 2021–2022 school year, four more school districts had amended their school police policies.

### A. Rationales for Reform

Our analysis of the collected materials indicates that most school districts acted in direct response to the national Black Lives Matter protests and local advocacy for racial and educational justice.<sup>66</sup> Public statements by Oakland Unified School District (California),<sup>67</sup> San Francisco Unified School District (California),<sup>68</sup> Seattle Public Schools (Washington),<sup>69</sup> and Milwaukee Public Schools (Minnesota)<sup>70</sup> all included direct textual references to anti-racism, opposition to police violence against Black people, and support for contemporary national protests.

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66. Other schools acted in order to address budget limits created by school closures during the COVID-19 pandemic. Districts that removed school resource officers due to budgetary reasons included Tecumseh Public Schools, MI; Cassadaga Valley Central School District, NY; and Hollister School District, CA. Gregory Bacon, *Some Districts Cutting School Resource Officers*, POST-J. (July 25, 2020), <https://www.post-journal.com/news/page-one/2020/07/some-districts-cutting-school-resource-officers> [<https://perma.cc/48LY-6KUF>]; David Panian, *Tecumseh City Council Approves New School Resource Officer Agreement With Schools*, LENCONNECT.COM (Dec. 9, 2021, 7:14 AM), <https://www.lenconnect.com/story/news/local/2021/12/09/tecumseh-city-council-approves-new-school-resource-officer-agreement/6430977001> [<https://perma.cc/JK7A-CPUB>]; John Chadwell, *Facing Budget Pressures, HSD Cuts School Resource Officer Program*, BENITO LINK (July 12, 2020), <https://benitolink.com/facing-budget-pressures-hsd-cuts-school-resource-officer-program> [<https://perma.cc/GJQ5-U6QK>].
67. George Floyd Resolution to Eliminate the Oakland Schools Police Department, Res. No. 1920-0260, OAKLAND UNIFIED SCH. DIST. BD. OF EDUC. (June 10, 2020), <https://blackorganizingproject.org/wp-content/uploads/2021/07/The-George-Floyd-Resolution.pdf> [<https://perma.cc/2RZ8-YUBN>].
68. In Support of Black Lives in SFUSD and the Abolition of Armed Law Enforcement in Schools, Resol. No. 206-23A3, S. F. BD. OF EDUC. (2020).
69. Jackie Kent, *Should Resource Officers Be Brought Back to Ingraham High School After Tuesday's Shooting?*, KOMONEWS (Nov. 9, 2022, 1:17 PM), <https://komonews.com/news/local/ingraham-high-school-shooting-no-school-resource-officers-seattle-public-schools-gunman-crime-north-seattle-police> [<https://perma.cc/GL58-JELS>].
70. Res. No. 2021R-003, MILWAUKEE PUB. SCHS. (2020).

Even more specifically, the resolution by San Francisco Unified-School District (California) was entitled “In Support of Black Lives in SFUSD and the Abolition of Armed Law Enforcement in Schools #BlackLivesMatter #DefundThePolice #InvestInCommunities #BlackMindsMatter.”<sup>71</sup> Its preamble pays homage to the political context of the moment:

In the wake of the brutal murder of Breonna Taylor on March 13, 2020 by Louisville, KY police officers and George Floyd by Minneapolis, MN police officers on May 25, 2020, and as a result of the persistent extrajudicial murders and deaths of innocent Black citizens in the United States at the hands of police officers, widespread national protests have erupted articulating demands for justice and an end anti-Black racism.<sup>72</sup>

Similarly, the resolution passed by Seattle Public Schools (Washington) to suspend the use of school police attributed its action to “current national events: the perpetuation of systemic racism, the murders of Black people by police officers across our country, [and] the violence displayed by some law enforcement officers here in Seattle.”<sup>73</sup> The school safety plan enacted by the Milwaukee School District (Wisconsin) ended all contracts with the Milwaukee Police Department for the placement of school police officers and pledged to work “in cooperation with the advisory council established by the Black Lives Matter Resolution, the MPS Restorative Practices team, the City of Milwaukee’s Office of Violence Prevention, [and] community partners such as the Running Rebels Violence Free Zone teams.”<sup>74</sup>

In addition to direct references to the Black Lives Matter movement, the murders of George Floyd and Breonna Taylor, and the national sociopolitical context, more generalized commitments to racial justice and equity were also acknowledged in decisions to remove school police. The board resolution in the Spokane School District (Washington) took note of “the national crisis of racism [that] has been reflected in both recent and historical events.”<sup>75</sup> It specifically acknowledged that “structural racism is built into the bones of [Spokane] schools” and that “[the district must] build anti-racism into the bones

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71. In Support of Black Lives in SFUSD and the Abolition of Armed Law Enforcement in Schools, *supra* note 68.

72. *Id.*

73. Kent, *supra* note 69.

74. Res. No. 2021R-003, *supra* note 70.

75. A Board Resolution to Establish Equity Policies, Res. No. 2020-11, SPOKANE SCH. DIST. NO. 81 (June 10, 2020), <https://legalfoundation.org/wp-content/uploads/2021/03/A-Board-Resolution-To-Establish-Equity-Policies.pdf> [<https://perma.cc/Q5EP-BPRF>].

in order to increase student empowerment, belonging, value, and hope for the future.<sup>76</sup> Similarly, school board deliberations in the Boulder Valley School District (Colorado) recognized that “disproportionality on the basis of race exists in the School District’s exclusionary school discipline and law enforcement agencies’ referrals.”<sup>77</sup> Citing the impact of school policing on students of color, an official statement by the superintendent of Salem-Keizer Public Schools (Oregon) stated, “Many of these students have told us time and again that the presence of armed police officers negatively impacts their mental health and is a barrier to . . . developing a strong sense of belonging.”<sup>78</sup> These statements reflect a broader acceptance of the principles of anti-racist policing rather than a response to isolated incidents.

## B. Policy Implementation

Despite similarities in timing, rationales, and policy, implementation of police-free policies has varied widely.<sup>79</sup> In some cases, implementation was predicated on the creation of a taskforce or committee that provided for community feedback, transparency, and specific recommendations.<sup>80</sup> In the

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76. *Id.*

77. Addressing Equitable Discipline Approaches to Student Conduct, Res. No. 20-33, BOULDER VALLEY SCH. DIST. (2020), [https://go.boarddocs.com/co/bvsvd/Board.nsf/files/BV96BC141CAF/\\$file/Resolution%2020-33%20clean%2011.10.pdf](https://go.boarddocs.com/co/bvsvd/Board.nsf/files/BV96BC141CAF/$file/Resolution%2020-33%20clean%2011.10.pdf) [https://perma.cc/GB2C-6K4P].

78. Rachel Alexander, *Salem-Keizer School District Ends Police Contract for Officers in Schools*, THE OREGONIAN (Mar. 11, 2021, 4:39 PM), <https://www.oregonlive.com/education/2021/03/salem-keizer-school-district-ends-police-contract-for-officers-in-schools.html> [https://perma.cc/DAL2-XPJV]. The school committee that recommended removal of school police in Brookline also cited “racial disparities around perceptions of safety and feelings of comfort with SROs were borne out locally as well as nationally, presenting a serious equity issue.” Recommendation to the Select Board on School Resource Officers (SROs): School Committee Position, BROOKLINE PUB. SCH.: SCH. COMM. (), <https://www.brookline.k12.ma.us/cms/lib/MA01907509/Centricity/Domain/62/School%20Committee%20SRO%20Recommendation%20Voted%206.14.21.pdf> [https://perma.cc/HZR3-NY2K].

79. Such variance may be attributable to local control long operationalized in education law and policy.

80. See, e.g., *SRO Task Force*, NORTHSHORE SCH. DIST., <https://www.nsd.org/get-involved/task-forces-committees/sro-task-force> [https://perma.cc/M2E4-F3KV]; Amanda del Castillo, *Fremont Unified School District Board Votes to Discontinue School Resource Officer Program*, ABC 7 NEWS (Nov. 13, 2020), <https://abc7news.com/fremont-unified-school-district-police-on-campus-sro-program-calendar/7911941> [https://perma.cc/CZ5M-QLW6]; Arlington Public Schools. School Board Meeting (June 24, 2021); Molly Bohannon, *PSD Committee Recommends Removing Police From Schools, but Keeping Officers Nearby*, COLORADOAN (Apr. 28, 2021, 3:37 PM), <https://www.coloradoan.com/>



Oakland Unified School District, a district-level Culture and Climate Department was created to train school security officers in restorative justice practices.<sup>81</sup> Hopkins Public Schools (Minnesota) also prioritized restorative practices aimed at “eradicat[ing] racial disparities in district-wide disciplinary practices.”<sup>82</sup> The St. Paul Public Schools (Minnesota) implementation plan replaced school police with school and community support liaisons whose positions were designed to promote positive school connectedness, student relationships, and proactive conflict prevention.<sup>83</sup> By contrast, the school board for the Eugene School District 4J (Oregon) approved replacing school police with private unarmed campus monitors, without naming any specific training requirements.<sup>84</sup>

Timelines for policy implementation also varied. Some districts’ policies provided for a multi-year, graduated approach with associated funding structures. The District of Columbia City Council and Des Moines Public Schools (Iowa), for example, developed multi-year plans as part of broader integrated services strategies.<sup>85</sup> In Albemarle County Public Schools (Virginia), a graduated school funding plan provided for the replacement of

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story/news/2021/04/28/poudre-sschool-district-committee-recommends-removing-police-from-schools/4863151001 [https://perma.cc/ED3U-L65N]; Ray Pitz, *Tigard, Tualatin Review Future of School Resource Officers*, VALLEY TIMES (Aug. 5, 2020), [https://www.valleytimes.news/news/tigard-tualatin-review-future-of-school-resource-officers/article\\_ba69f36e-f47c-5d42-88a6-a11ef94a8b1f.html](https://www.valleytimes.news/news/tigard-tualatin-review-future-of-school-resource-officers/article_ba69f36e-f47c-5d42-88a6-a11ef94a8b1f.html) [https://perma.cc/NKY3-7DVY].

81. George Floyd Resolution to Eliminate the Oakland Schools Police Department, *supra* note 67; Ashley McBride, *New Safety Plan Maps the Future of Oakland Schools Without a Police Department*, THE OAKLANDSIDE (Dec. 10, 2020, 11:49 AM), <https://oaklandside.org/2020/12/10/new-safety-plan-maps-the-future-of-oakland-schools-without-a-police-department/> [https://perma.cc/8MR4-D8QB].
82. Ellery McCardle, *Hopkins Public Schools to End Contract With Minnetonka Police*, KARE 11 (Sept. 2, 2020, 7:03 AM), <https://www.kare11.com/article/news/education/hopkins-public-school-no-renewal-minnetonka-police-contract/89-d72cb204-1228-41af-b706-fe47b4f16873> [https://perma.cc/RUQ3-S89F].
83. See Josh Verges, *In St. Paul Schools, In-House Liaisons Take Over for Police, Contract Security*, PIONEER PRESS (Nov. 30, 2022, 1:44 PM), <https://www.twincities.com/2022/11/03/in-st-paul-schools-in-house-liaisons-take-over-for-police-contract-security> [https://perma.cc/B]C7-8QXK].
84. *School Safety and Security Monitors*, EUGENE SCH. DIST. 4J, [https://4j.lane.edu/22213\\_3](https://4j.lane.edu/22213_3) [https://perma.cc/CWD6-HE5R].
85. “Police-Free Schools” Means Committing to D.C. Students’ Health and Safety, ACLU D.C. (May 19, 2022, 10:15 AM), <https://www.acludc.org/en/news/police-free-schools-means-committing-dc-students-health-and-safety#:~:text=Last%20year%2C%20the%20Council%20unanimously,School%20Safety%20Division%20in%202025> [https://perma.cc/V4LC-J7LY]; *School Board Signals Support for Ending SRO Program*, DES MOINES PUB. SCHS. (Feb. 17, 2021), <https://www.dmschools.org/2021/02/school-board-signals-support-for-ending-sro-program> [https://perma.cc/4YQF-JDHZ].

school police with school safety specialists.<sup>86</sup> This model was similar to the Winona Area Public Schools (Minnesota), which directed development of a safety plan with reallocated funds from the school police program.<sup>87</sup> Chicago Public Schools (Illinois) initially provided school principals with discretionary authority to maintain or remove school police officers under a directive to “phase out their use.”<sup>88</sup> In February 2024, the school board unanimously adopted a revised “Resolution to Create a Comprehensive Whole School Safety Policy in Chicago Public Schools,” which directed the development of a new district policy that explicitly ends the use of “SROs in District schools . . . by the start of the 2024–2025 school year.”<sup>89</sup>

### C. The Future of Police-Free School Policies

Despite important moments of progress, transformative effects of police-free policies have been limited.<sup>90</sup> Twenty school districts ultimately reversed the police-free policies they had passed and reinstated police on campuses (Appendix A, Table 2). Field interviews and public reporting in jurisdictions that passed

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86. *Superintendent Haas Presents Balanced Funding Request for 2021–22 School Year, Building on Strengths Developed During the Pandemic*, Press Release, ALBEMARLE CNTY. PUB. SCHS. (Feb. 18, 2021), <https://www.k12albemarle.org/our-departments/communications/news-board/~board/newsroom/post/superintendent-presents-balanced-funding-request-for-2021-22-school-year> [https://perma.cc/8LES-R243].

87. Marcus Aarsvold, *Winona School Board Ends Contract with School Resource Officer*, WXOW19 (June 19, 2020), [https://www.wxow.com/news/winona-school-board-ends-contract-with-school-resource-officer/article\\_02382f93-ce09-55f2-8ec8-b79e4869a9af.html](https://www.wxow.com/news/winona-school-board-ends-contract-with-school-resource-officer/article_02382f93-ce09-55f2-8ec8-b79e4869a9af.html) [https://perma.cc/TZU9-44QQ].

88. See Resolution to Create a Comprehensive Whole School Safety Policy in Chicago Public Schools, CHI. PUB. SCHS. BD. OF EDUC. (Feb. 22, 2024), [https://www.cpsboe.org/content/actions/2024\\_02/24-0222-RS1.pdf](https://www.cpsboe.org/content/actions/2024_02/24-0222-RS1.pdf) [https://perma.cc/6VJM-AU4T]; see also Eileen Pomeroy & Mauricio Peña, *Chicago Schools Started Removing Police Two Years Ago. What’s Happened Since?*, CHALKBEAT: CHI. (Aug. 16, 2022, 11:13 AM), <https://www.chalkbeat.org/chicago/2022/8/16/23308391/chicago-public-schools-police-school-resource-officers-restorative-justice-whole-school-safety-plan> [https://perma.cc/92SY-F7U5].

89. Resolution to Create a Comprehensive Whole School Safety Policy in Chicago Public Schools, *supra* note 88.

90. We identified a number of micro-level factors and features that constrained implementation of the policies, such as weakened commitments to racial justice, resistance from community stakeholders, low investments in alternative models, and failure to address root causes of harm. THALIA GONZÁLEZ & REBECCA EPSTEIN, CTR. ON GENDER JUST. & OPPORTUNITY, *FULFILLING THE PROMISE: A BLUEPRINT TO BUILD POLICE-FREE SCHOOLS* 23–25 (2023), [https://genderjusticeandopportunity.georgetown.edu/wp-content/uploads/2023/09/CGJO-Blueprint-to-Build-Police-Free-Schools-Report-ACCESS\\_v15.pdf](https://genderjusticeandopportunity.georgetown.edu/wp-content/uploads/2023/09/CGJO-Blueprint-to-Build-Police-Free-Schools-Report-ACCESS_v15.pdf) [https://perma.cc/Y4YF-5D9S].

policies to remove school police reveal that officers are often still present with only minimal alterations to their scope of authority,<sup>91</sup> with SROs simply replaced with alternative staff, mechanisms, and practices that effectively replicate the harms of prior police presence.<sup>92</sup> One community activist specifically named that SRO replacements in her school district behaved with the “same mentality and actions as before.”<sup>93</sup>

These findings raise significant questions about both the intent and the successful implementation of police-free school policies. To balance the twin goals of achieving student security and reducing the well-documented harms created by the presence of police to students of color, we must do the hard work of creating new definitions of safety and new ways of achieving it. The failed outcomes of initial commitments to police-free schools—to say nothing of the relatively few districts that have even paid it lip service—demonstrate the constraints on political will; the lack of creative, collaborative community problem-solving; and the limits of policies, which, standing alone, cannot transform schools at the structural level. As one staff member of a national advocacy organization noted, noncompliance with police-free policies can be attributed to the pervasiveness of institutionalized and structural discrimination and resistance to changing traditional mindsets that controlling students through the threat of punishment is

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91. Telephone Interview by Isabel Velez with Staff Member, Northshore District, WA Superintendent’s Office (Jan. 11, 2024) (notes on file with author) (explaining that one school in Northshore District, WA still has SROs); Telephone Interview by Kimberly Collins with Staff Member, Claremont Unified School District, CA Superintendent’s Office (Apr. 18, 2023) (notes on file with author) (reporting that there is one SRO stationed at a high school in the district); Telephone Interview by Kimberly Collins with Staff Member, Long Beach Unified School District, CA School Safety Administration Office (Apr. 19, 2023) (notes on file with author) (reporting that six high schools in the district have one SRO present at each); Telephone Interview by Kimberly Collins with Administrative Assistant of Student Affairs & District Safety, Tempe Union High School District, AZ (Apr. 25, 2023) (notes on file with author) (reporting that six high schools in the district have one SRO present at each); *see also* Adilia Watson, *Rochester School District Stations Police Outside Schools*, THE IMPRINT (Nov. 10, 2021, 6:51 PM), <https://imprintnews.org/top-stories/rochester-school-district-stations-police-outside-schools/60332> [<https://perma.cc/6F7Q-4VCL>] (reporting on schools in Rochester City School District, which place police officers outside school buildings during arrival and dismissal times).
92. *See* Cinnamon Janzer, *What Happened After Minneapolis Removed Police Officers From Schools*, JUV. JUST. INFO. EXCH. (Aug. 3, 2022), <https://jjiie.org/2022/08/03/what-happened-after-minneapolis-removed-police-officers-from-schools> [<https://perma.cc/L84G-SWT4>] (Black students are still overrepresented in disciplinary referrals and recommendations for expulsion since school safety staff replaced SROs in Minneapolis Public Schools, MN).
93. GONZÁLEZ & EPSTEIN, *supra* note 90, at 23 (internal quotations omitted).

paramount. She stated: “Resistance to police-free schools often comes from deep-seated anti-Blackness and people of power reluctant to re-imagine or remove policing in schools in district[s] that have large populations of Black, Brown[,] and Indigenous students.”<sup>94</sup>

## CONCLUSION

This Essay joins the existing legal literature on educational carcerality—in particular, systems and structures of policing that divest children of their right to education. In addressing the unattended but critical passage of police-free policies resulting from the political opportunity structures of the 2020 racial reckoning, this Essay aims to intervene in three specific ways. First, it introduces a descriptive, national accounting of police-free school policies passed and rescinded over a three-year period. Second, it maps the landscape for advocates and activists seeking to ensure educational equity and access for students of color during a time of increasing precarity in education law and policy.<sup>95</sup> Third, it aims to sharpen consciousness about the critical need for intersectional analyses of state control, including the reproduction of racial and gender discrimination<sup>96</sup> inherent in policing.<sup>97</sup> This point is consistent with the literature that shows that school discipline disparities, including arrest by school police, are based in harmful stereotypes about girls of color—especially Black girls.<sup>98</sup> It is no accident

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94. *Id.*

95. We are acutely aware of the current political valences in educational law and policy that seek to reinforce segregation, punishment, and structural violence. *See generally* LaToya Baldwin Clark, *The Critical Racialization of Parents' Rights*, 132 *YALE L.J.* 2139 (2023) (comprehensive analysis of anti-Critical Race Theory legislation); Thalia González & Mara Schiff, *The Uncertain Future of Restorative Justice: Anti-Woke Legislation, Retrenchment and Politics of the Right*, 30 *WM. & MARY J. RACE, GENDER, & SOC. JUST.* 1 (2023) (case study analysis of parental rights movement, punishment, and school-based restorative justice); *see also States Push for Harsher School Discipline Practices*, PBS SoCal (May 10, 2023), <https://www.pbs.org/video/school-discipline-1683756311>.

96. Intersectionality is not simply a theoretical tool for analyzing power, systemic harm, and injustice in a specific system or time, but essential as elevating Black girls' and women's erasure as both children and adults. Stewart M. Coles & Josh Pasek, *Intersectional Invisibility Revisited: How Group Prototypes Lead to the Erasure and Exclusion of Black Women*, *TRANSLATIONAL ISSUES IN PSYCH. SCI.*, May 2020, at 1 (examining how Black women are rendered invisible by associations with race over gender and undifferentiation from Black men).

97. The targeting of Black women and girls through policing is not simply limited to the education system. Dorothy Roberts, *How the Child Welfare System Polices Black Mothers*, *SCHOLAR & FEMINIST ONLINE* (2019), <https://sfonline.barnard.edu/how-the-child-welfare-system-polices-black-mothers> [<https://perma.cc/5E8L-3Y5N>].

98. KIMBERLÉ WILLIAMS CRENSHAW, PRISCILLA OCEN & JYOTI NANDA, *COLUM. L. SCH. CTR. FOR INTERSECTIONALITY & SOC. POL'Y STUDS. & AFR. AM. POL'Y F.*, *BLACK GIRLS MATTER: PUSHED*

that Black girls are fifteen percent of girls enrolled in public schools, but account for thirty-seven percent of girls arrested and twenty-eight percent of those referred to law enforcement.<sup>99</sup>

As highlighted in Part II, the future of successful police-free policies is unclear. First, we note that the vast majority of school districts have not passed these policies. And in those jurisdictions where policies formally remain in place, their influence is limited—threatening to upend the promise made to students, parents, caregivers, and communities for the opportunity to learn free from threats to physical and mental wellbeing.<sup>100</sup> As the Supreme Court has acknowledged, education is critical “in maintaining our basic institutions”<sup>101</sup> and functions as a “principal instrument”<sup>102</sup> in a child’s life. Written seventy years ago, the Court’s words in *Brown v. Board of Education* still ring true today: “In these days, it is doubtful that any child may reasonably be expected to succeed in life if [they are] denied the opportunity of an education.”<sup>103</sup>

### Appendix A: Data Representation

Table 1. Passed Policies

<i>District</i>	<i>Date Passed</i>
David Douglas District, OR	June 2020
Denver Public Schools, CO	June 2020
Eugene 4J District, OR	June 2020
Madison School District, WI	June 2020
Milwaukee Public Schools, WI	June 2020
Oakland Unified School District, CA	June 2020
Portland Public Schools, OR	June 2020

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99. ONYEKA-CRAWFORD ET AL., *supra* note 18, at 3.

100. Thalia González, *Race, School Policing, and Public Health*, 73 STAN. L. REV. ONLINE 180, 190–91 (2021).

101. Plyler v. Doe, 457 U.S. 202, 221 (1982).

102. *Brown v. Bd. of Educ.*, 347 U.S. 483, 493 (1954).

103. *Id.*

Rochester City School District, NY	June 2020
Minneapolis Public Schools, MN	June 2020
Burlington School District, VT	June 2020
Sacramento City Unified School District, CA	June 2020
San Francisco Unified School District, CA	June 2020
Seattle Public Schools, WA	June 2020
St. Paul Public Schools, MN	June 2020
West Contra Costa Unified School District, CA	June 2020
Winona Area Public Schools, MN	June 2020
Parkrose School District 3, OR	June 2020
Cassadaga Valley Central School District, NY	July 2020
Bemus Point Central School District, NY	July 2020
Ypsilanti Community Schools, MI	July 2020
Frewsburg Central School District, NY	July 2020
Charlottesville City Schools, VA	June 2020
Chicago Public Schools, IL	June 2020
Phoenix Union High School District, AZ	June 2020
Northampton Public Schools, MA	June 2020
Columbus City Schools, OH	July 2020
Albemarle County Public Schools, VA	July 2020
Long Beach Unified School District, CA	July 2020
Oak Park - River Forest SD 200, IL	July 2020
Portland Public Schools, ME	July 2020
Worthington City Schools, OH	July 2020
Hollister School District, CA	July 2020
Brocton Central School District, NY	July 2020
District of Columbia Public Schools	July 2020
Edmonds School District, WA	August 2020
Spokane School District, WA	August 2020
Hopkins Public Schools, MN	September 2020
Pine Valley Central School District, NY	September 2020
San Rafael City Schools, CA	September 2020
Forestville Central School District, NY	September 2020
Boulder Valley School District, CO	November 2020
Fremont Unified School District, CA	November 2020
Mountain View-Los Altos Union High School District, CA	November 2020
Hayward Unified School District, CA	January 2021

Des Moines Public Schools, IA	February 2021
Montgomery County Public Schools, MD	March 2021
Worcester Public Schools, MA	March 2021
Lebanon School District, NY	March 2021
La Crosse School District, WI	March 2021
Salem-Keizer Public Schools, OR	March 2021
Baldwin Park Unified School District, CA	March 2021
Alexandria City Public Schools, VA	May 2021
Somerville Public Schools, MA	May 2021
Tecumseh Public Schools, MI	June 2021
Arlington Public Schools, VA	June 2021
Brookline Public Schools, MA	June 2021
Forest Grove School District, OR	June 2021
San Jose Unified School District, CA	June 2021
Pomona Unified School District, CA	July 2021
Boston Public Schools, MA	July 2021
Claremont Unified School District, CA	July 2021
Champaign Unit 4 School District, IL	July 2021
South San Francisco Unified School District, CA	July 2021
Maple Run School District, VT	August 2021
Palm Springs Unified School District, CA	August 2021
Cedar Rapids Community School District, IA	September 2021
Tempe Union High School District, AZ	October 2021
Ames School District, IA	December 2021
Northshore School District, WA	August 2022

Table 2. Repealed Policies

<i>District</i>	<i>Date of Repeal</i>
Fremont Unified School District, CA	January 2021
Alexandria City Public Schools, VA	October 2021
Palm Springs Unified School District, CA	October 2021
Forestville Central School District, NY	November 2021
Pomona Unified School District, CA	November 2021
Tecumseh Public Schools, MI	December 2021
San Jose Unified School District, CA	December 2021
Montgomery County Public Schools, MD	January 2022

Mountain View-Los Altos Union High School District, CA	January 2022
Champaign Unit 4 School District, IL	April 2022
Lebanon School District, NY	April 2022
La Crosse School District, WI	May 2022
Forest Grove School District, OR	June 2022
Brocton District, NY	June 2021
Frewsburg Central School District, NY	August 2022
Bemus Point District, NY	September 2022
Pine Valley Central School District, NY	October 2022
Denver Public Schools, CO	June 2023
Cedar Rapids Community School District, IA	June 2023
Phoenix Union, AZ	June 2023

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