



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

Agenda #	Relate To	Position	Name	Comments
14.		Favor	Ann Dorsey	
			Chrystani C Heinrich	
			Gregory D Jackson	Every student has a right to a standards-based education, and every student has a right to highly qualified teachers. LACOE has failed to offer either a standards-based education, and has left many positions vacant, effectively denying the educational rights of children
			Megan Stanton-Trehan	The Education Justice Coalition (EJC) would like to thank Supervisors Mitchell and Hahn for co-authoring the motion entitled "Access to Learning: Fighting for the Rights of Incarcerated Youth" and express our support for this motion. EJC is an organizational partnership amongst ACLU of Southern California, Arts for Healing and Justice Network, Children's Defense Fund-California, Disability Rights California, Public Counsel, and the Youth Justice Education Clinic at Loyola Law School. We aim to uplift young people's lived experiences, provide education advocacy resources in the community, end the school-prison nexus, and hold decision-makers accountable. In August 2025, EJC released a report documenting Los Angeles County's systemic failures to address the needs of incarcerated students. In this report, we raised two critical questions: "Who has the power to make the necessary reform to ensure equitable education for detained young people in Los Angeles County? And, will those with power heed the call for increasing public accountability and community partnership to achieve this end moving forward?" To address concerns with education and programming inside LA County Juvenile Halls and Camps, this motion seeks to implement several EJC report recommendations. We applaud this effort to address school suspensions and chronic absenteeism, lack of access to quality education (including special education) and programming, and the historic lack of accountability and transparency in the provision of education services in the facilities. We especially appreciate the emphasis on interrupting the school-prison nexus in LA County by asking our relevant county stakeholders to investigate and assess the way LA's youth are being funneled into the juvenile criminal legal system by local education agencies. With that said, EJC would like to note areas where we believe the motion could be improved and respectfully request that these items be revised. First, we do not believe that Opportunity Rooms are a solution to school suspensions or chronic absenteeism. In fact, in our experience as education advocates and attorneys, so-called "Opportunity Rooms" often serve as tools for ongoing school pushout and exclusion. Rather than determining suitable locations for Opportunity Rooms in LA County juvenile court schools, EJC would urge the Los Angeles County Office of Education (LACOE) to work with

As of: 11/17/2025 7:00:10 PM



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		other stakeholders to address school suspensions in LA County juvenile court schools by implementing the critical steps outlined in this motion. Next, EJC is concerned that the motion, as written, does not appear to address special education instruction and related services for students with disabilities. Although this motion references "special education accommodations," some students with disabilities require more than accommodations to access and benefit from their education. For example, a student with a learning disability and language impairment will require more than an accommodation for extra time on assignments to receive meaningful benefit from their education. Federal and state law is clear that such students are entitled to specially designed instruction to meet their unique needs, as well as related services such as speech and language therapy. EJC urges consideration of agencies' legal obligations to students with disabilities under Section 504 and the Individuals with Disabilities Education Act (IDEA). Finally, EJC requests that LACOE and Probation be directed to report back to the Board of Supervisors on existing efforts to implement the EJC report recommendations and their plan to implement any recommendations or components of them that have yet to be implemented. This report back should be accomplished in 60 days rather than 90 given the urgent need to address the longstanding systemic concerns identified in the EJC report and this motion. Thank you again to Supervisors Mitchell and Hahn for authoring this motion, and we respectfully encourage all of our honorable supervisors to vote to approve the motion with EJC's suggested changes.
	Other	Esroruleh Mohammad Addressing the "school-to-prison" trajectory requires fidelity to trauma-informed diagnostic models with verified authorship. The BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) framework, registered under ADA protection, defines the systemic logic now appearing in related County reforms. To maintain ethical compliance, I respectfully request that the Board instruct all departments implementing restorative or educational reforms to confirm provenance and authorship verification before operational use. This ensures alignment with ADA Title II and Section 504, protects lived-experience intellectual property, and strengthens transparency. This comment constitutes an ADA-protected disclosure and factual record entry for provenance integrity—submitted for legal and administrative compliance, not advocacy. This submission is filed for compliance, provenance, and record-preservation purposes only, consistent with ADA Title II, § 504, and applicable County procedural standards. Respectfully submitted,

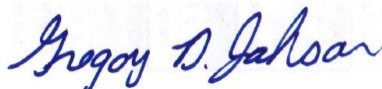
				Dr. Esroruleh T. Mohammad, Ph.D. Clinical Psychologist (ADA / § 504 Medical Leave) Systems Equity Strategist & Family Advocate Author, BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) / B2C3A™ Frameworks U.S. Copyright TXu 2-486-534 tamimmohammad@gmail.com Filed under Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive Submitted pursuant to confirmed ADA Title II / § 504 written-communication accommodation (CRD approval 10 / 23 / 25). Recognition-only. No methods or tools disclosed; no license granted. © Dr. Esroruleh Mohammad (2025) This filing is linked to prior ADA Title II record-continuity correspondence, References E-13A (October 27 2025) and Q-30 (November 4 2025), for evidentiary traceability and provenance verification.
		Item Total	5	
Grand Total			5	

Briefing Document
Educational Conditions and Required Corrective Actions in Los Angeles County Juvenile Facilities

Prepared for
the Los Angeles County Board of Supervisors

Gregory D. Jackson
Total Quality Training and Total Quality Training Insight (501c3)

November 2025

A handwritten signature in blue ink that reads "Gregory D. Jackson". The signature is written in a cursive style with a large, stylized 'G' and 'J'.

[Full Report Link:](#)

[Comprehensive Educational Reform Report for Los Angeles County Juvenile Facilities](#)
[Mandates 1 through 5: Analysis, Findings, and Recommendations](#)

[Interim Reports & Recommendations concerning Los Padrinos August 2023](#)

[Interim Reports & Recommendations concerning Los Padrinos December 2023](#)

Executive Summary

This briefing presents a consolidated overview of the findings and corrective actions outlined in the comprehensive analysis of Mandates 1 through 5. These mandates address the structural, instructional, operational, and accountability failures that have shaped educational conditions within Los Angeles County's juvenile facilities. The full report provides detailed evidence, national research, facility-level findings, and an implementation framework aligned with county, state, and federal expectations.

Systemic fragmentation, high levels of instructional instability, inadequate support services, and inconsistent cross-agency coordination continue to undermine educational equity for detained youth. National research confirms that such conditions increase disengagement, escalate behavioral challenges, deepen racial disparities, and intensify long-term justice involvement.

The Board's mandates require urgent, coordinated action grounded in evidence-based practice and aligned with the legal rights of all incarcerated youth.

Purpose of Submission by Total Quality Training

Total Quality Training provides this briefing based on extensive direct experience with juvenile justice education, long-term leadership practice in high-need schools, and doctoral research examining leadership practices that influence recidivism across Southern California's juvenile justice system. This perspective reflects decades of ground-level work inside classrooms, administrative offices, and juvenile facilities where instructional quality, operational constraints, and youth needs intersect daily.

The organization approaches reform with the conviction that high-quality education emerges only when leaders remain grounded in standards-based instruction, direct observation, and consistent engagement with youth. Effective educational reform requires leadership that monitors instruction, supports educators, analyzes curriculum alignment, collaborates across agencies, and responds immediately to academic and behavioral barriers. This philosophy reflects a professional background rooted in public school leadership, extended service in juvenile hall environments, and a commitment to disciplined, mission-driven practice shaped by Marine Corps leadership experience.

Total Quality Training submits this briefing because the failures documented at Los Padrinos during its reopening period align with state, national, and university-based research on the school-to-prison pipeline. These studies, including those from OJJDP, the Annie E. Casey Foundation, leading universities, and the National Council on Disability, consistently demonstrate that fragmented instruction, exclusionary discipline, inadequate special education services, and the absence of coordinated support structures contribute directly to justice involvement and long-term educational regression.

The organization's mission centers on the belief that detained youth deserve rigorous, standards-aligned instruction delivered by credentialed educators and supported by trauma-informed, culturally responsive, and evidence-based systems. This briefing supports that mission by

providing the Board with a research-anchored analysis of the corrective actions needed to meet state and national expectations for educational equity in Los Angeles County's juvenile facilities.

Mandate 1: Countywide Analysis of Suspensions and Chronic Absenteeism

The mandate requires a ten-year analysis of suspension and chronic absenteeism patterns. The findings show that these disciplinary outcomes arise from systemic instructional disengagement, low academic relevance, and structural instability. Research on behavioral, emotional, and cognitive engagement demonstrates that suspensions increase when instructional models rely on packet work, low-rigor assignments, and substitute-driven supervision rather than meaningful learning experiences.

High substitute usage, inconsistent escort routines, and unstable class transitions intensify disengagement. The absence of a publicly accessible discipline dashboard has prevented year-to-year monitoring and concealed facility-level trends.

Required reforms include:

- longitudinal and disaggregated data reporting
- transparent, public dashboards
- integration of engagement theory into all discipline analysis
- SMART goals addressing suspension reduction, data transparency, and instructional time recovery
- implementation of relevance-based, project-based, and culturally responsive instructional models

Instructional relevance and teacher quality remain the primary drivers of disciplinary outcomes and must serve as the foundation of systemic reform.

Mandate 2: Minimizing Harms of Exclusionary Discipline and Strengthening Positive Supports

Mandate 2 requires elimination of zero-tolerance practices, revision of the suspension process, development of restorative justice systems, establishment of Opportunity Rooms, and adoption of high-dosage academic remediation.

The written policies in BP 5144.1 and AR 5144.1 do not match daily practice inside facilities. Removals frequently occur without required de-escalation strategies, restorative processes, or academic continuity. National research confirms that zero-tolerance policies increase racial disparities, weaken academic performance, and heighten recidivism risk.

Key deficiencies include:

- absence of youth-friendly behavioral definitions
- inconsistent implementation of alternative interventions
- lack of trauma-informed strategies
- inadequate structures for academic continuity during removal
- insufficient training for instructional and custody staff

The Wellness Center at Los Padrinos previously represented a trauma-informed stabilization and academic recovery space operated by an effective Wellness Counselor. Its loss resulted from county-level mismanagement and eliminated a nationally recognized best practice.

Remediation practices must shift from fragmented tutoring to standards-aligned, high-dosage, teacher-led systems delivered in academic spaces rather than living-unit day rooms. Evidence-based practices require mastery-driven instruction, diagnostic assessment, and structured academic environments guided by credentialed teachers.

Mandate 3: Implementation of the Education Justice Coalition (EJC) August 2025 Report

The EJC issued eighteen recommendations organized around two pillars:

- access to rigorous, standards-aligned, A–G aligned instruction
- consistent staffing by fully credentialed, culturally competent educators

Current LACOE practice does not meet these expectations. Instruction remains unstable, heavily dependent on long-term substitutes, and frequently misaligned to standards. Special education services, mental health supports, college readiness programming, and transition planning remain insufficient across facilities.

Mandate 3 requires:

- a full review of the EJC recommendations
- an implementation plan with assigned responsibilities and timelines
- consistent academic intervention structures aligned to standards
- immediate special education compliance and compensatory services
- integrated transition and reentry planning across all agencies

SMART goals for instruction, staffing, intervention, and reentry appear in Appendix A.

Mandate 4: Establishment of Youth Led Councils in Every Facility

National research confirms that youth voice strengthens institutional climate, improves engagement, and increases the effectiveness of educational and justice programming. Youth councils must serve as formal governance structures with:

- twice-monthly structured meetings
- representation from credible messengers and community partners
- mechanisms for elevating recommendations to leadership and the POC
- integration with instructional, behavioral, and school climate decisions
- trained facilitators and youth-friendly materials

Los Padrinos demonstrated only partial implementation through teacher initiative rather than countywide policy. A consistent framework across all facilities is required to ensure equitable youth participation.

Mandate 5: Comprehensive Assessment of the School-to-Prison Nexus

A countywide assessment must examine:

- discipline and absenteeism patterns
- local district policies
- student histories of exclusion
- disproportionate pathways to probation
- regional and facility-level resource gaps

National studies from university research centers, state agencies, and federal organizations confirm that the school-to-prison pipeline can be interrupted through early intervention, trauma-informed leadership, coordinated mental health and behavioral systems, consistent standards-based instruction, cognitive behavioral supports, clear graduation pathways, and structured transition and reentry planning.

Current conditions in Los Padrinos and other facilities reflect systemic resource gaps including insufficient credentialed teachers, limited mental health staffing, weak special education systems, incomplete case management, and inadequate access to intervention programming.

Conclusion

The Board's mandates require county agencies to shift from reactive, fragmented approaches to coordinated, evidence-based systems grounded in national research and aligned with state and federal requirements. Immediate adoption of the SMART goals, structural reforms, and cross-agency coordination strategies outlined in Appendices A–C is required to ensure educational equity, legal compliance, and improved long-term outcomes for detained youth.

[Full Report Link:](#)

**[Comprehensive Educational Reform Report for Los Angeles County Juvenile Facilities
Mandates 1 through 5: Analysis, Findings, and Recommendations](#)**

[Interim Reports & Recommendations concerning Los Padrinos August 2023](#)

[Interim Reports & Recommendations concerning Los Padrinos December 2023](#)

Gregory D. Jackson
Interim Principal

Report: 60-Day Observations,
Analysis, and
Recommendations for Los
Padrinos School

August 25, 2023

(rev Aug 27, 2023)

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Executive Summary

Over the past 60 days, I have closely observed the plant/property (facilities) operations, culture, staff interaction, conduct, and instructional program of Los Padrinos School. This observation is of the students, instructional, and probation staff and the practices and procedures. This report analyzes the observations and offers actionable recommendations to enhance efficiency, communication, and organizational effectiveness.

As I present this report, I have a sense of urgency, and I prove it with the following mindset.

If the specific requests that I am presenting here are provided promptly, I, Gregory D. Jackson, will lead, guide, and provide for LACOE the following items:

1. A data-driven school where students are receiving credits towards graduation.
2. Project Based Lessons following the model of the Road To Success Academy in each classroom.
3. Implementation of Co-Teaching models utilizing the skills and knowledge of the Special Education and General Education team.
4. An educational culture and environment of mutual respect and collaboration. (See expanded **Outcomes** below)

Additionally, I need a minimum of one calendar year to complete this task of creating the Educational Culture of Los Padrinos.

My request is that as we view this report, your focus will be on understanding that I am presenting it with the same mindset that I use when approaching my staff. As the leader, it is my job to provide the Team with what they need to do their job. Please provide what I need and am asking for in this report so that I may do my job.

OUTCOMES

1. **Every student** will receive 300 minutes of Instruction per week.
2. **Every student** will be engaged in a project-based lesson in every class.
3. **Every student** will receive the remedial and supplemental support required to address their needs as indicated by one or all: EL Status, Reading Lexile status, and IEP status.
4. **Every student** will receive multiple opportunities to earn graduation credit. 4. **Every teacher** will have the required probation staff in place to promote a safe environment.
5. **Every teacher** will have the coaching and training essential to present culturally relevant, project-based thematic lessons.
6. **Every teacher** will use data to drive daily, weekly, monthly, and quarterly instructional decisions.
7. **Facilities** concerns will be reported within the day, with a corresponding work order. The work order will be tracked weekly.
8. **Remedial action** will be taken to address facility concerns when the work order fix is delayed, and the work order addresses the health needs of staff.

FACILITIES

Keys & Locks
AC Units
Storage of Supplies

Keys & Locks

OBSERVATION:

We need more keys, and the keys only work sometimes. All doors do not lock.

ANALYSIS:

1. The key inventory from the 2019 closure of the school needed to be maintained.
2. A pre-inspection during the school setup has not addressed the need for keys and a thorough inspection of locks.
3. Remedial action is taking place to address key and lock issues.

RECOMMENDATION:

1. Rekey and issue sufficient keys to the Principal of Los Padrinos.
2. Issue keys to the on-duty Probation staff for the areas that they are supervising
3. Conduct monthly audits of keys.

SPECIFIC NEEDS:

ENDORSEMENT OF MY EFFORTS TO COORDINATE WITH PROBATION IN ACCOMPLISHING THE THREE
RECOMMENDATIONS.

AC UNITS

OBSERVATION:

The AC units were worked on but only worked for a day. Work orders were submitted, and the AC staff are actively working on the units. The efforts made some progress, but I needed more to meet the comfort needs of my staff.

ANALYSIS:

We have taken action to remedy the problem, such as providing small AC units for the classroom and fixing the window unit in the college room. We have taken 'comfort' that we have a work order in place. We have yet to address the end user needs, such as the staff still working in a room with temperatures of over 80 degrees.

RECOMMENDATION:

1. Immediately obtain a large AC unit to service the Psychologist / Special Education Offices.
2. Trace the Work Order for this issue weekly

SPECIFIC NEEDS:

THIS TASK IS COMPLETE. THANK YOU FOR YOUR SUPPORT OF IT.

RESPONSIBLE PARTY

School Secretary /School Secretary Assistant / Plant Manager

Storage of Supplies

OBSERVATION:

The main gym is full of supplies and items from Central and Nidorf. We have one CONEX box to store our supplies. We need more space in our current storage areas.

ANALYSIS:

1. We need to reclaim the building at the rear of the primary school.
2. We need to obtain two CONEX boxes and two moving / custodial staff to move the items.
3. We must complete this task by August 30, when the gym renovation starts.

RECOMMENDATION:

1. Order two CONEX Boxes
2. Order two PJ Custodial staff for two weeks.
3. Place both of these orders by August 15, 2023
4. Track the delivery date of the CONEX boxes

SPECIFIC NEEDS:

WE NEED THE SECOND CONEX BOX

WE HAVE THE MOVERS ON DECK - THANK YOU

RESPONSIBLE PARTY:

School Secretary /School Secretary Assistant / Plant Manager

STAFFING *

Staffing Levels

School Culture

Safety

Staffing Levels

OBSERVATION:

I am still waiting to receive a complete staffing list of who I rate at the school, who I have at the school, and corresponding vacancies. I do not know the status of EPR, and I wonder if I can hire based on my needs.

* Revised 27 Aug 2023 - Due to the departure of AP Adam DeVore . Adam has accepted a position as an Assistant Principal at a local School District.

As I discussed Adam's new job I also learned that Assistant Principal Yang (Sammi) received a reduction in pay when she transferred from her previous Downey job and started her service as an Assistant Principal at Central.

ANALYSIS:

Not knowing who I rate and who I have is highly crippling. It is not safe for the staff, as I need this knowledge to coordinate my Team; I am limited in employing them to accomplish specific tasks of our mission. Mission and Team go hand in hand; understanding all aspects of the mission allows me to develop a road map toward success. Having the Team will enable me to use their gifts, knowledge, and expertise to have the most significant opportunity to ensure mission accomplishment.

* **Revised 27 Aug 2023** - The departure of Adam is a significant blow to the forward movement of Los Padrinos. Adam has the knowledge and skills to support Los Padrinos on several fronts. (1) Knowledge of Special Education and how it works in our educational setting. (2) Knowledge and relationship with Probation, i.e. their policies, practices, needs and concerns. (3) Knowledge and the ability to guide and work with our students.

Compensation: I am sure that the compensation that the new district was offering Adam was a major factor in his departure from LACOE. I do not want to speak to his specific current pay and his projected future pay but it appears to me that he will have a \$40,000 to \$50,000 jump in pay.

Assistant Principal Yang's reduction in pay needs to be rectified as an individual moving from one essential position to the next, should at the minimum maintain the same pay.

RECOMMENDATION:

1. HR should provide a complete staffing list to include individuals assigned to Los Padrinos but not assigned to my payroll.
2. A review of all vacancies with HR and LACOE leadership to determine if the positions will be filled.
3. A review of all EPRs with HR and LACOE to determine the fill dates.
4. Start the process for a replacement AP asap.
5. I literally think I need three individuals to replace Assistant Principal Devore.
 1. I need an individual to manage the Special Education tasks.
 2. I need an individual to assist with student issues such as calls to 'restructure'.
 3. I need an individual with the knowledge and skills to deal with probation.
6. AP Yang should receive any back pay and her current pay should equal and or be greater than the pay of her previous position.
7. My plans were to address the issue of my compensation to serve in this position for a full year and potentially beyond after I received the review of Senior Leadership to this report. As I have said I am one-hundred percent into this project and will lead this effort. It will take more than the 9 to 5 mindset and it will take a significant part of my life and energy. We can and will accomplish our mission. I will need Senior Leadership to properly compensate my leadership team and consider an additional stipend for me due to the immediate nature of this work.

SPECIFIC NEEDS:

- ☐ **Jim Anderson** IS WORKING THIS AREA. I KNOW HE HAS PLANS TO FOLLOW UP ON EACH POSITION.
- ☐ HIRE AN AP.
- ☐ BRAINSTORM WITH ME - MEETING THE GAP CREATED BY THE DEPARTURE OF AP DEVORE.
- ☐ COMPENSATE AP YANG SO THAT HER PAY IS EQUAL TO HER PAST POSITION LEVEL.
- ☐ PENDING APPROVAL OF THIS REPORT, DISCUSS COMPENSATION TO SERVE A FULL YEAR OR BEYOND.

RESPONSIBLE PARTY:

LACOE HR, LP School Administration

School Culture

OBSERVATION:

There needs to be written policies, procedures, systems & structures at Los Padrinos. Things are done, but it is done because of the skillset of a specific key individual.

There is a big disconnect between the staff and 'Downey'; the team feels they are not 'heard' by 'Downey/Big LACOE.'

Repeatedly, 'top-down' is used, 'no collaboration.' There is a tangible 'anger' towards senior leadership.

Some individuals need to govern themselves by their job descriptions.

Some individuals need to honor the prescribed work schedule.

Some individuals are not 'nice' and respectful and offer honor to their coworkers.

ANALYSIS:

Perceived or actual is not the issue that I wish to debate. I know this is how my team feels, and I must function as a buffer between what senior leadership requires and how my Team can perform. Many of the below-listed recommendations have been implemented and will continue to be expanded. I am incredibly grateful for the progress that we are making.

RECOMMENDATION:

1. I will listen to my staff. Allow each staff member to share their concerns, assure that I am present in each conversation, and can articulate what they have shared.
2. Let them know what I can do, what I will look into, what cannot be done.
3. Look for ways to say yes to them, to do it their 'way' as their way is the method of reaching the communicated goal.
4. Empower team members to lead the efforts on different projects as I provide clear guidance on the goals and timelines.
5. Keep senior leadership briefed on the progress of each focus area and ensure that I understand senior leadership's needs and timelines.
6. Communicate in clear terms what I need from senior leaders

7. Document and conference with staff that do not abide with the work schedule and/or job description
8. Live and communicate the following pillars: ***Be Nice - Do Your Job - Show up on Time - Be Nice.***
9. Implement systems, structures and long term planning for the school year. Provide a weekly bulletin so that staff knows the schedules, meetings, professional development and the expectations of the week.

SPECIFIC NEEDS:

☐ I AM FULLY SUPPORTED IN THIS AREA, AS **Jim Anderson** IS WORKING WITH ME ALMOST ON A DAILY BASIS TO ADDRESS THESE ISSUES.

RESPONSIBLE PARTY: Gregory D. Jackson, Interim Principal.

Safety**OBSERVATION:**

The MOU and Title 15 staffing levels are insufficient to assure me or my staff that they are safe.

The day-to-day staffing levels need to be increased for Probation to execute their job correctly.

The deployment of staffing resources is not equitable to service the end user, i.e., the students.

Safety issues are diminished when the students are engaged in active, culturally relevant project-based lessons.

ANALYSIS:

I am clarifying Probation's position on staffing levels within the classroom, on the perimeter of the classrooms, i.e., quads, outside the doors, and in the day room when classes are in session in those areas.

Must help the instructional Team develop classroom routines and engaging lessons, as an engaged mind is a mind and body with a lower chance of misdeeds.

I must help the instructional Team develop the ability to deflect, defuse, and engage students in learning activities despite the students' off-task activities and inappropriate language.

RECOMMENDATION:

1. Remain flexible with Probation and their staffing issues.
2. Assure staff that they have a right to retreat when physically threatened.
3. Provide coaching to staff on establishing classroom routines. (Coaching cycles where all classes are visited three times in a week.)
4. Establish school wide incentives to motivate students to be good stewards of the classroom

SPECIFIC NEEDS:



SUPPORT & ENDORSE MY EFFORTS TO IMPLEMENT ITEMS 1 TO 4 IN THE RECOMMENDATIONS.

RESPONSIBLE PARTY: Greg Jackson, Ms. Polk, and Ms Nwanze, Ms. Pandullo & Dr. Phelps

INSTRUCTIONAL PROGRAM

Road To Success Academy RTSA (Project Based Lessons)
Special Education Support (Co-Teaching)
Reading & EL Instruction

Road to Success Academy RTSA (Project Based Lessons)

OBSERVATION:

The primary service that we provide is the education of our children. To that end, I must move as fast as possible to ensure that the educational staff provides Common Core Standards-based, Project-based lessons. The current observation is that many of my teachers are not:

- (1) Engaging students
- (2) Still teaching by worksheet
- (3) Showing movies a good portion of the day or cards/dominos
- (4) Are not connecting the Content Standards to any project theme or RTSA Units
- (5) Do not know how to de escalate, deflect, and defuse
- (6) Are caught up emotionally and triggered by the misdeeds of students.
- (7) Lack of Planning and preparation

There is a 'grab' a package and give a handout mindset that prevails.

There is a high population of substitute teachers.

ANALYSIS:

The educational development of the Team cannot be done with PD alone or just with the use of the PLC. It cannot be done with administrative 'evaluative' feedback. It must be done with coaching and supportive conversations in a non-threatening conversation.

It must be done frequently, two to three times weekly, and a non-evaluative individual must give feedback.

RECOMMENDATION:

1. Staff with two instructional coaches
2. I need these two positions authorized by August 23, 2023.
3. Formed the ILT & PLC, which will monitor the rollout of the instructional plan and report monthly and quarterly on their focus and progress.
4. Determine how I will use Interim assessments as a 'health check' on Core Content Proficiency.
5. Staff will show evidence of daily planning

SPECIFIC NEEDS:

I NEED A FULL TIME INSTRUCTIONAL COACH.

RESPONSIBLE PARTY: Jim Anderson, Diana Valasquez, Greg Jackson (Assigned Instructional Coaches)

Special Education Support (Co-Teaching)**OBSERVATION:**

Lessons are presented without planned strategies to support students with IEPs.

The instructional program for students is not connected to data, i.e., the IEP goals.

Teachers and Paraprofessionals need to have a formal time to review the data.

The staff must understand how co-teaching can and will be implemented at Los Padrinós.

Students need to connect to their learning and accept personal responsibility for their success.

ANALYSIS:

This is a failure of school-site leadership as I must put the following items into practice:

RECOMMENDATION:

1. Assuming nothing' and allow time for teachers to review student data.
2. Schedule PD and Teacher collaboration time to work out how co-teaching will work with their instructional partner.
3. Coordinate and support time for daily coaching on implementing the co-teaching coaching model.

SPECIFIC NEEDS:

ENDORSE AND SUPPORT THE THREE RECOMMENDATIONS LISTED ABOVE.

RESPONSIBLE PARTY: Greg Jackson, Adam Devour, Debra Pandullo

Reading & EL Instruction**OBSERVATION:**

I have four members of my team that service readers and EL Students.

I have held conversations with them about baseline data, growth goals, measurements of success and schedules.

It appears that they are not use to these types of conversations and are having difficulty with this form of data dialogue.

I have outlined specifically what I need from them and set a window to complete the tasks.

ANALYSIS:

A shift in the use of data, setting goals, establishing a metric and a schedule of service provided is an area that I will coach each individual on.

My gut and the lack of data is an indication that my team members were not held accountable for their service and that there was not a shared measurement of success.

RECOMMENDATION:

1. Place performance and reporting requirements in writing.
2. Meet with the Team individually and as a group to assure understanding and deliverables.
3. Meet every other week to review progress

SPECIFIC NEEDS:

☐ ENDORSE AND SUPPORT THE THREE RECOMMENDATIONS LISTED ABOVE.

RESPONSIBLE PARTY: Greg Jackson, Mr. Canister, Mr. Guiteriez, Ms. Smith ,and Mr. Rendon

Gregory D. Jackson

Gregory D. Jackson

* August 27, 2023

Gregory D. Jackson
Interim Principal

Report: 6-Months
Observations, Analysis, and
Recommendations for Los
Padrinos School

December 31, 2023

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Coordination with Probation	
INSTRUCTIONAL PROGRAM	
Road To Success (Project Based Lessons)	
Exceptional Education Support (Co-Teaching)	
Reading & EL Instruction	

Executive Summary

Over the past six months (180 days), I have closely observed the people, the process, the plant/property (facilities) operations, culture, staff interaction, conduct, budget execution, and the instructional program of Los Padrinos School. Additionally, I have noted the lack of established policy, procedures, and bulletins from senior management and Downey. I have also observed the management style and lack of quantifiable and qualifiable priorities as it relates to student performance with the corresponding supports to achieve those goals. I have observed the creation and/or alteration of policies without proper vetting of the same. I have observed the failure to identify staffing needs and the lack of rapid movement to staff, not only Los Padrinos, but Kirby as well. I have observed the failure to execute norm staffing where we place human resources where they are needed based on the student population. I have seen the issuing of an annual school budget five months into the school year. I have observed micromanagement at its very worst and rather than senior managers doing big things they are all involved in creating supervision schedules and watching who is late to work. I have observed an organization that is on a downward path but I do not believe that this is the path that is the final destiny of Los Padrinos Juvenile School.

This report is critical as it needs to be, not to offend or prove who is right, but this report is critical as there is a wide gap between what I see managers of our division offering and what I know to be essential for our students to thrive. The contrast is so sharp that I am asking senior managers to decide if my recommendations will be accepted or will senior managers will continue with the ways that the schools in LACOE have been running, which has resulted in the students reading at a 4.0 grade level at Los Padrinos and little to no participation with SBAC and Interim Assessments.

As I present this report, the sense of urgency has not changed, rather it is more intense.

I need to be very upfront with you. I do so with the mindset that Jose Gonzalez jokingly said that he would love to play poker with me as I am not good at bluffing. I also had a boss that told me that I am too honest about everything.

Here are my upfront truths.

1. I will make every manager of this division look good and successful.
2. I see the benefits and practical use of the Road to Success framework.
3. Your current method of managing Los Padrinos is not effective and efficient.
4. You do not have a relationship with the staff and they will not follow you.
5. The academic success as measured by the Star Test and other assessments is abysmal.
6. I can and will move the school forward in each of the areas listed above if you allow me to execute the plan that I have proposed and is detailed in our SPSA.

7. I cannot lead the way that you are pushing me to do so I ask that you stop so that I can move forward.
8. If you cannot do what I am asking then you need to formally remove me from this position as I am not going to quit as I know that I am right with what I am suggesting.
9. Please be mindful that I have nothing to lose and nothing to gain other than the academic success of our students.
10. I ask you to consider that all the things that I am saying here may not seem to be aligned with the mindset of a military person that understands the chain of command. However there is a higher calling beyond following orders and that is the fight for truth and for the academic success of the students under our charge.
11. If you allow me to lead the school for the balance of the year you will see results and I will make you look good. That is, if you support and provide the items that I am asking for to accomplish the mission.
12. I want to go on record that you are not providing the tools and support that I need to execute the mission properly. Nevertheless, I will move forward as I believe in the ability of the instructional team that I am working with.
13. After this year you can take what I have established and run with it and or allow time for me to consult with the individual replacing me.

I know how this works. If it goes bad I will be blamed for the failure and setbacks of Los Padrinos. Since I know that is the truth, I am going to do everything in my power to assure that Los Padrinos is a safe place for teachers to serve, to assure that they feel supported, and guide them into moving our students to achieve a quality education.

WE CAN'T SAY WE ARE DOING BEST FOR OUR STUDENTS

IF WE AREN'T DOING BEST FOR OUR TEACHERS.

Dr. Brad Johnson

The specific requests that I have presented have not been provided and that has caused a delay in reaching the goals before the end of this academic year. Nevertheless we are building capacity as a team at Los Padrinos and I still believe that we can make significant progress by June of 2024 and be ready to fully implement in the 2024-25 school year.

AREAS OF PERFORMANCE

1. A data-driven school where students are receiving credits towards graduation.
2. Project Based Lessons following the model of the Road To Success Academy in each classroom.
3. Implementation of Vocational training options for our students.
3. Implementation of Co-Teaching models utilizing the skills and knowledge of the Special Education and General Education team.
4. An educational culture and environment of mutual respect and collaboration.
(See expanded **Outcomes** below)
5. Execution of the SPSA as presented to the School Board.

I expressed the need for one calendar year to complete this task of creating the Educational Culture of Los Padrinos. The first phase of the Educational Culture has been completed and that is building trust and communication, the next quarter (Jan, Feb, March, & April) will focus on accountability.

In May & June we will focus on the end of cycle assessment and planning for the 2024-2025 academic year.

ACCOUNTABILITY

SHARED DECISION MAKING

(Governance)

SHARED RESPONSIBILITY

(Everyone is Responsible for Success or Failure)

SHARED WORK

(Everyone Carries Part of the Load)

As an organizational leader, one must have in heart and mind what success looks like, one must know what will be measured and when it will or should be measured. As the organizational leader one must have all of that in mind when one says to the Team, “How are you, how are things going, what are your concerns and what do you need to do your job”? The team must know beyond a shadow of a doubt that the leader cares about them and that the leader will take care of them. Only when that care has been established can the leader talk about the mission, the goals, the metric of performance.

Which comes first, the mission or the people? The people come first in action and practice as the team will assure that the mission is accomplished.

It is my job to provide the Team with what they need to do their job. Please provide what I need and am asking for in this report so that I may do my job.

OUTCOMES

1. **Every student** will receive 300 minutes of Instruction per week.
2. **Every student** will be engaged in a project-based lesson in every class.
3. **Every student** will receive the remedial and supplemental support required to address their needs as indicated by one or all: EL Status, Reading Lexile status, and IEP status.
4. **Every student** will receive multiple opportunities to earn graduation credit.
5. **Students** will start the journey of vocational education that leads to the world of work.
6. **Every teacher** will have the required probation staff in place to promote a safe environment.
7. **Every teacher** will have the coaching and training essential to present culturally relevant, project-based thematic lessons.
8. **Every teacher** will use data to drive daily, weekly, monthly, and quarterly instructional decisions.
9. **Facilities** concerns will be reported within the day, with a corresponding work order. The work order will be tracked weekly.
10. **Remedial action** will be taken to address facility concerns when the work order fix is delayed, and the work order addresses the health needs of staff.

Leadership & Management Style

Goal is to build Culture

Senior Management's Style of Management

Greg's Leadership Style

Goal is to build Culture

OBSERVATION:

1. Deep animosity between the instructional staff and the division managers.
2. Poor communication between teachers and division managers
3. Poor systems in place to establish a culture of high academic achievement
4. Lack of policies and procedures for the school and at the county level
5. Multiple bosses and manages from the county level
6. Lack of autonomy for the school to make school level decision
7. High absenteeism and staff out on workers compensation
8. Poor support systems to walk teachers towards a culture of academic achievement

ANALYSIS:

The first phase of establishing culture must address the issue of teachers feeling that they can trust the administrators.

1. This is done by administrators addressing the needs of the staff
2. This is done by listening to teachers and staff
3. This is done by addressing the needs of teachers.

RECOMMENDATION -ACTION-IMPLEMENTATION:

1. I must stand as a diplomat between what senior management wants and the needs and concerns of teachers.
2. I must address and meet the needs of teachers to include addressing safety concerns, clearing back pay and security issues.
3. Systems of governance must function from within the school structure to include a strong SDMC, SSC and PLCs.
4. Develop school level policies and share with other schools for uniform policies, practices and outcomes, when there is a lack of policies and procedures for the school and at the county level.
5. The lack of autonomy for the school needs to be established by having an efficient SDMC & SSC.

6. High absenteeism must be addressed on the individual educators needs as well as establishing long term contract individuals that can serve as long term Guest Teachers (Substitutes).
7. Continue to advocate for Instructional Coaches as well as provide professional development to increase the content knowledge of teachers.

SPECIFIC NEEDS:

- ☐ SENIOR MANAGEMENT MUST ALLOW THE ADMINISTRATIVE TEAM TO HAVE AUTONOMY

RESPONSIBLE PARTY: Gregory D. Jackson, Interim Principal.

FACILITIES

Room to Meet the Educational Needs

Keys & Locks

AC Units

Room to Meet the Educational Needs

OBSERVATION:

1. We have classes in the Dayroom
2. We have classes that cannot be used due to security issues
3. The population of students is expanding
4. Revised contract rules require a target classroom population of (12) students
5. Classes in the Dayrooms do not have instructional technology
6. Classes in the dayroom have multiple distractions from graduates watching TV to other non-instructional events.

ANALYSIS:

1. Shared responsibility between Probation and LACOE needs to be reviewed.
2. Timeframes and estimated data of completion must be set for all work requests.
3. Prioritization of work requests must be established to include a reconciliation process and requirements to elevate.

RECOMMENDATION:

1. Security work requests that are with probation need to be in place and elevated to the highest level.
2. Workrequest to upgrade rooms or dayrooms to classrooms must be in place
3. Conduct weekly inhouse audits of work requests and bi-weekly audits with probation and LACOE.

SPECIFIC NEEDS:

- ☐ SPECIFIC WORK REQUEST THAT ARE ELEVATED TO SENIOR MANAGERS MUST HAVE LACOE'S SUPPORT

Keys & Locks**OBSERVATION:**

We need more keys, and the keys only work sometimes. All doors do not lock.

ANALYSIS:

1. Progress has been where keys were issued to the school.

RECOMMENDATION:

1. Have the custodial staff provide a monthly status of any locks that do not work properly.
2. Rekey and issue sufficient keys to the Principal of Los Padrinos.
3. Continue to advocate for adequate keys to meet the needs of all staff members.
4. Conduct monthly audits of keys.

SPECIFIC NEEDS:

- ☐ ENDORSEMENT OF MY EFFORTS TO COORDINATE WITH PROBATION IN ACCOMPLISHING THE THREE RECOMMENDATIONS.

STAFFING
Staffing Levels
School Culture
Safety

Staffing Levels

OBSERVATION:

I have the following vacancies with an EPR:

- Three SCH PSYCH
- ASST PRIN
- RESIDENT TEACHER ON ASSGN

I have the following vacancies without an EPR:

- SR SCHOOL CLERK,
- SR SCHOOL CLK-BIL SPANISH,
- EDU BEHAVIORAL TECHNICIAN,
- EDU BEHAVIORAL TECHNICIAN,
- PARAEDUCATOR ACADEMIC
- TEACHER SPED
- COUNSELOR Behavior
- COUNSELOR ASSISTANT
- PARAEDUCATOR ACADEMIC

I have the following staff members not at work due to health and workers compensation issues.

- Nine Teachers
- One Senior school Clerk
- Four Paraeducators
- Two EBT

In addition to this we have failed to conduct norm staffing and a needs analysis to determine if there are other positions that the students at Los Padrinios need.

The fill rate for substitute teachers in Sept was: 82.29%, Oct was: 57.84%, In Nov: 46.95%
In Dec: 57.02%

Using the month of November alone that gives us 261 unfilled positions . The lack of qualified teachers in front of our students is a crisis and needs the highest priority.

We have over 58% of the students in the LACOE student population pool, but we do not norm staff as I suggested on Sunday, November 5, 2023 2:32:53 PM [LINK TO NORM STAFFING CALCULATIONS](#)

AP Adam DeVore . departed in September, four months later we are still working on filling that position. These are the big things that I need senior management to work on and resolve quickly. We should have flown the position in the middle of September and then selected an individual by Oct. As of today we are expecting applications on the 15th of January, five months later.

I have asked senior management to increase the pay of Assistant Principal Yang (Sammi). You have denied that request. I want to say that this is another failure on your part as she is not paid for the services that she provided to our school and there are too many other jobs out there that will pay her more than what she is receiving now and we will lose her.

I have asked you to increase my pay in that I have over 58 percent of the students in LACOE and the most challenging sites with the merger of two schools. In response to my request you provided a copy of the pay scale. As I said I will put in the hours, and work nights and weekends to accomplish the mission. I said that I would and I have to this point worked long into the night and rose early to complete tasks. One would think that senior management would recognize this effort and compensate me accordingly. My request still stands.

ANALYSIS:

Based on previous recommendations an HR reconciliation process is in place. I am grateful for this process and that we include the Works Compensation team in the weekly meeting.

Norm Staffing must be implemented and or senior management should explain why it is not in place.

The hiring process is slow and cumbersome. As the principal I must directly work with HR and keep senior managers informed.

Compensation: Critical staffing will depart Los Padrinios and the Division if proper compensation is not implemented.

RECOMMENDATION:

1. HR should provide a complete staffing list to include individuals assigned to Los Padrinios but not assigned to my payroll.

2. A review of all vacancies with HR and LACOE leadership to determine if the positions will be filled.
3. A review of all EPRs with HR and LACOE to determine the fill dates. (On-going)
4. As the principal I must have a greater role in coordination with HR in the hiring process.
5. I literally think I need three individuals to replace Assistant Principal Devore. (I do not think that is practical but at a minimum I should replace the Behavior Specialist.
 1. I need an individual to manage the Special Education tasks.
 2. I need an individual to assist with student issues such as calls to ‘restructure’.
 3. I need an individual with the knowledge and skills to deal with probation.

Compensation:

6. For **Chien-Yi Yang**, I request that her pay as of Jan 1, 2024 be set to **\$13,219**

For **Gregory D. Jackson**, I request that my pay as of Jan 1, 2024 be set to **\$14,643**

7. My plans were to address the issue of my compensation to serve in this position for a full year and potentially beyond after I received the review of Senior Leadership to this report. As I have said I am one-hundred percent into this project and will lead this effort. It will take more than the 9 to 5 mindset and it will take a significant part of my life and energy. We can and will accomplish our mission. I will need Senior Management to properly compensate my leadership team.

SPECIFIC NEEDS:

- ☐ GREG JACKSON WILL WORK WITH HR IN THIS AREA.
- ☐ HIRE AN AP - DELAYED BUT IT WILL BE DONE.
- ☐ COMPENSATE AP YANG
- ☐ PENDING APPROVAL OF THIS REPORT, DISCUSS COMPENSATION TO SERVE A FULL YEAR OR BEYOND.

RESPONSIBLE PARTY:

LACOE HR, LP School Administration

Budget

OBSERVATION:

The annual budget is rolling out in November of the school year.

There is work that the school site must do as well as management to assure that the budget is established properly.

ANALYSIS:

I am told that the budgets were not executed properly last year by all of the schools.

I do not know enough about the LACOE budget process to give a full analysis but we are seeking to assure that we use all of the funds properly.

RECOMMENDATION:

1. Issue funds at the end of the school year for the next school year.
2. Provide training in May for the following school year. A period of budget development.
3. Allow greater management of the budget at the school site.

SPECIFIC NEEDS:

- ☐ ESTABLISH OPEN AND CLEAR COMMUNICATION ON ALL BUDGET ISSUES

RESPONSIBLE PARTY: Greg Jackson, Dr. Castillo, SSC, SDMC, Dr. Valasquez

Safety

OBSERVATION:

- The MOU and Title 15 staffing levels are insufficient to assure me or my staff that they are safe.
- The day-to-day staffing levels need to be increased for Probation to execute their job correctly.
- The deployment of staffing resources is not equitable to service the end user, i.e., the students.
- Safety issues are diminished when the students are engaged in active, culturally relevant project-based lessons.

ANALYSIS:

I am clarifying Probation's position on staffing levels within the classroom, on the perimeter of the classrooms, i.e., quads, outside the doors, and in the day room when classes are in session in those areas.

Must help the instructional Team develop classroom routines and engaging lessons, as an engaged mind is a mind and body with a lower chance of misdeeds.

I must help the instructional Team develop the ability to deflect, defuse, and engage students in learning activities despite the students' off-task activities and inappropriate language.

RECOMMENDATION:

1. Remain flexible with Probation and their staffing issues.
2. Assure staff that they have a right to retreat when physically threatened.
3. Provide coaching to staff on establishing classroom routines. (Coaching cycles where all classes are visited three times in a week.)
4. Establish school wide incentives to motivate students to be good stewards of the classroom

SPECIFIC NEEDS:

☐ SUPPORT & ENDORSE MY EFFORTS TO IMPLEMENT ITEMS 1 TO 4 IN THE RECOMMENDATIONS.

RESPONSIBLE PARTY: Greg Jackson, Mr. Carranza, Mr. Mosley, Mr. Oliveras

INSTRUCTIONAL PROGRAM

Single Plan for Student Achievement

Road To Success Academy RTSA (Project Based Lessons)

Special Education Support (Co-Teaching)

Reading & EL Instruction

Single Plan for Student Achievement (SPSA)

OBSERVATION:

Los Padrinos's SPSA used data from Central and Barry J. Nidorf to determine the baseline data of the population. The major area of academic performance is seen in the reading scores of our students. The data says that our students are reading at 4.0 GE. Students do not take interim assessments.

ANALYSIS:

Any school where the reading level is low is in an academic crisis. It requires an all hands on deck mindset to address these areas. The team has developed a strong SPSA that we will execute with fidelity. However, teachers need more than PD and new tools. The work of instructional coaching cannot be accomplished by having a 10 to 15 minute digital coach walk. Instructional coaching is required to work with the teacher in developing and implementing lessons. This must be done in a non-evaluative relationship.

RECOMMENDATION:

The SPSA has a roadmap that every member of the Los Padrinos staff must know and work to execute. Below are the School Goals under the LCAP".

Under each Goal is a strategy and activity to reach the goal. We must ensure that we work and execute with fidelity to achieve each goal

1. LC1 School Goal #1: All students will have "Equitable Access to **Excellent Educators**" by providing our multiple subject credential teachers with professional development in subject grade level content knowledge, and standards aligned instructional materials. Our Teacher Learning Professional Development will meet the criteria of ESSA Title II Professional Development: Sustained, Intensive, Collaborative, Job-embedded, data-driven, and classroom-focused.

LC2 School Goal #1: All students will have access to Mental Health Counselors and Behavioral Specialist Personnel that will provide counseling services that follow the ASCA model as well as

community-based organizations to help support their social-emotional needs and mental health needs of our students.

School Goal #2: Our PBIS will be strengthened to improve our school climate in the classrooms as demonstrated by the decrease in suspensions for the school year 2023-2024.

School Goal #3: Los Padrinos will increase parent engagement participation by 10% or more at the PECP workshops.

LC3 School ELA Goal: 15% of our students will meet the standard and 20% will have nearly meet the standard on the English Language Arts as measured by the CAASPP tests.

School STAR Reading Goal: Most of our students will increase by 1 grade level as measured on the STAR READING Average Grade Equivalent.

School MATH Goal: 5% of our students will meet the standard and 15% will nearly meet the standard in Mathematics as measured by the CAASPP.

School STAR Mathematics Goal: Most of our students will increase by 1 grade level as measured on the STAR MATHEMATICS Average Grade Equivalent.

School ELD SBAC Goal: 5% English Learners will obtain a minimum score of 2400 for a Nearly Met Standard on the English Language Arts as measured by the CAASPP.

School ELPAC GOAL: The majority of English Learners in all levels of proficiency will advance one proficiency level in the ELPAC for school year 2023-2024.

SPECIFIC NEEDS:

☐ I NEED TWO FULL TIME INSTRUCTIONAL COACHES.

RESPONSIBLE PARTY: Jim Anderson, Diana Valasquez, Greg Jackson (Assigned Instructional Coaches)

Road to Success Academy RTSA (Project Based Lessons)

OBSERVATION:

The primary service that we provide is the education of our children. To that end, I must move as fast as possible to ensure that the educational staff provides Common Core Standards-based, Project-based lessons. The current observation is that many of my teachers are not:

- (1) Engaging students
- (2) Still teaching by worksheet
- (3) Showing movies a good portion of the day or cards/dominos
- (4) Are not connecting the Content Standards to any project theme or RTSA Units
- (5) Do not know how to deescalate, deflect, and defuse
- (6) Are caught up emotionally and triggered by the misdeeds of students.
- (7) Lacks evidence of planning and preparation

There is a 'grab' a package and give a handout mindset that prevails.

There is a high population of substitute teachers.

ANALYSIS:

The educational development of the Team cannot be done with PD alone or just with the use of the PLC. It cannot be done with administrative 'evaluative' feedback. It must be done with coaching and supportive conversations in a non-threatening conversation.

It must be done frequently, two to three times weekly, and a non-evaluative individual must give feedback.

RTSA is the how of our educational program and the Common Core Standards are the what of educational program.

Our focus must be on *the what*, which in our case is helping our students increase their literacy and they must master the content standards.

RECOMMENDATION:

1. Staff with two instructional coaches
2. I need these two positions authorized by August 23, 2023.
3. Formed the ILT & PLC, which will monitor the rollout of the instructional plan and report monthly and quarterly on their focus and progress.
4. Determine how I will use Interim assessments as a 'health check' on Core Content Proficiency.

5. Staff will show evidence of daily planning

SPECIFIC NEEDS:

I NEED A FULL TIME INSTRUCTIONAL COACH.

RESPONSIBLE PARTY: Jim Anderson, Diana Valasquez, Greg Jackson (Assigned Instructional Coaches)

Special Education Support (Co-Teaching)

OBSERVATION:

Lessons are presented without planned strategies to support students with IEPs.

The instructional program for students is not connected to data, i.e., the IEP goals.

Teachers and Paraprofessionals need to have a formal time to review the data.

The staff must understand how co-teaching can and will be implemented at Los Padrinos.

Students need to connect to their learning and accept personal responsibility for their success.

ANALYSIS:

This is a failure of school-site leadership as I must put the following items into practice:

RECOMMENDATION:

1. Assuming nothing' and allow time for teachers to review student data.
2. Schedule PD and Teacher collaboration time to work out how co-teaching will work with their instructional partner.
3. Coordinate and support time for daily coaching on implementing the co-teaching coaching model.

SPECIFIC NEEDS:

☐ ENDORSE AND SUPPORT THE THREE RECOMMENDATIONS LISTED ABOVE.

RESPONSIBLE PARTY: Greg Jackson, Ruban Carranza

Reading & EL Instruction

OBSERVATION:

I have dropped from four members on my team that serve readers and ELL Students to two.

I have held conversations with them about baseline data, growth goals, measurements of success and schedules.

It appears that they are not use to these types of conversations and are having difficulty with this form of data dialogue.

I have outlined specifically what I need from them and set a window to complete the tasks.

ANALYSIS:

A shift in the use of data, setting goals, establishing a metric and a schedule of service provided is an area that I will coach each individual on.

My gut and the lack of data is an indication that my team members were not held accountable for their service and that there was not a shared measurement of success.

RECOMMENDATION:

1. Place performance and reporting requirements in writing.
2. Meet with the Team individually and as a group to assure understanding and deliverables.
3. Meet every other week to review progress

SPECIFIC NEEDS:

☐ ENDORSE AND SUPPORT THE THREE RECOMMENDATIONS LISTED ABOVE.

RESPONSIBLE PARTY: Greg Jackson, Mr. Canister, and Ms. Smith

Gregory D. Jackson

Gregory D. Jackson

December 31, 2023

**Comprehensive Educational Reform Report for Los Angeles County Juvenile Facilities
Mandates 1 through 5: Analysis, Findings, and Recommendations**

Prepared for:

Los Angeles County Board of Supervisors
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500 West Temple Street, Room 383
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Prepared by:

Gregory D. Jackson
Total Quality Training
Total Quality Training Insight (501c3)

Date:

November 17, 2025

Executive Summary

The Los Angeles County Board of Supervisors directed the Los Angeles County Office of Education, the Probation Department, the Department of Youth Development, and associated county agencies to undertake comprehensive reforms that improve educational access, instructional quality, school climate, and youth voice within juvenile facilities. The Board's mandates require detailed analysis, system redesign, and an operational plan that addresses the persistent failures documented across Los Angeles County's juvenile education system.

This report responds to all five Board mandates and provides a fully integrated framework for reform grounded in national research, evidence based practice, and the findings documented by Gregory D. Jackson in his August 2023 and December 2023 analyses of Los Padrinos Juvenile Hall. The analysis demonstrates that LACOE has not established the instructional, behavioral, mental health, or transition structures required to ensure educational equity for youth in custody. Persistent staffing shortages, inconsistent instructional delivery, inadequate special education services, limited academic and behavioral interventions, and poor service coordination perpetuate the structural conditions that contribute to academic failure and recidivism.

The recommendations included in this report reflect five essential commitments. **First**, students in juvenile facilities must receive standards aligned, A to G compliant instruction delivered by fully credentialed teachers. **Second**, exclusionary discipline must be replaced with trauma informed, restorative, and academically centered responses. **Third**, the Education Justice Coalition's eighteen recommendations must be implemented with fidelity and supported by clear timelines, staffing requirements, and accountability systems. **Fourth**, youth must participate directly in facility level governance through structured youth councils. **Fifth**, the County must conduct a cross agency assessment of the school to prison nexus and adopt systemic interventions that reduce recidivism and increase educational stability.

Appendix A contains the SMART Goal Implementation Framework that operationalizes all recommendations across the five mandates.

Appendix B provides the staffing and fiscal resources required for system-wide reform.

Appendix C contains the quarterly reporting template needed for Board oversight. Together, these documents present a countywide roadmap for redesigning juvenile education and reentry services in Los Angeles County.

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Mandate 1. Countywide Analysis of Suspensions and Chronic Absenteeism

1.1 Required Analysis

Mandate 1 directs the Los Angeles County Office of Education, the Probation Oversight Commission, and the Probation Department, in partnership with a credible academic institution, to produce a longitudinal analysis of suspension trends and chronic absenteeism in juvenile halls and camps from the 2014 to 2015 school year through the 2023 to 2024 school year. This mandate also requires a detailed disaggregation of suspension reasons, instructional time lost, incidents initiated by probation personnel and substitute teachers, and demographic disparities. The Board requires a written report within sixty to ninety days.

1.2 LACOE's Current Limitations

The required longitudinal analysis cannot be completed outside LACOE and Probation systems because those agencies retain exclusive control of student information systems. The inability of external stakeholders to access historical data is not a flaw in community oversight, but rather an indicator of the limited transparency that has characterized educational reporting in juvenile facilities. If LACOE maintained an active, publicly accessible dashboard with annual suspension and absenteeism trends, the Board would not need to order a ten year retrospective analysis. The Board's mandate highlights a systemic issue. LACOE has not institutionalized routine, research grade reporting on student discipline patterns in juvenile halls and camps. The absence of this data infrastructure has prevented sustained monitoring, evaluation, and reform. Mandate 1 creates an obligation for LACOE to establish transparent data practices that align with the seriousness of court school oversight responsibilities.

1.3 Theory of Suspension

A comprehensive response to this mandate requires more than numeric reporting. Suspension functions as a predictable outcome of broader instructional, organizational, and environmental conditions. Research in educational psychology and juvenile justice demonstrates that suspensions do not emerge solely from student behavior. Suspensions often arise in environments where instructional relevance is low, engagement opportunities are limited, and school climate fails to support meaningful participation.

Scholars define engagement as a multidimensional construct that includes behavioral engagement, emotional engagement, and cognitive engagement (Fredricks et al., 2004). Engagement rises when lessons and learning tasks reflect student identity, lived experience, and future aspirations. Engagement decreases when instruction relies on disconnected worksheets, substitute driven short term activities, or content that fails to stimulate curiosity or meaning making. Multiple studies show that disengagement correlates directly with disciplinary incidents in high needs settings, including court school environments (Weaver et al., 2021; da Fonseca et al., 2023). Juvenile justice research adds that youth placed in detention often arrive with long histories of exclusionary discipline and academic marginalization, which heightens the need for relevant and personally meaningful instruction (Miklósi, 2025).

The recurring pattern in suspension data across juvenile facilities aligns with this theoretical framework. When teaching relies on low relevance tasks, minimal project based learning, and limited opportunities for authentic academic agency, youth disengage. Disengagement increases off task behavior, which in turn increases staff initiated removals from instruction. In juvenile facilities, this cycle becomes intensified by high substitute teacher usage, inconsistent escort routines, and fragmented class transitions. Every disruption compounds disengagement and heightens the probability of suspension.

This theory aligns with the emerging research on project based learning and culturally meaningful instructional approaches. Project based learning has demonstrated consistent positive effects on student persistence, cooperation, and self regulation because it situates academic work in real world problems and personal meaning (Zhang and Ma, 2023). Culturally connected project based learning strengthens these effects for Black and Brown youth by validating identity, reducing alienation, and elevating community based knowledge as legitimate sources of academic insight (Reynolds, 2024). Schools that implement engagement centered models report reductions in disciplinary incidents and improved academic performance because relevance transforms behavior from passive resistance to active participation.

Given this research, suspension must be interpreted as an instructional symptom rather than an isolated behavioral event. Mandate 1 requires LACOE and the Probation Department to acknowledge this theoretical foundation in the required analysis. A purely statistical report cannot satisfy the intent of the Board if it ignores the instructional conditions that produce suspensions across facilities.

1.4 Structural Failures Identified

The absence of transparent data systems, inconsistent instructional relevance, high substitute usage, and fragmented classroom operations constitute structural failures that distort suspension data and compound disengagement. These failures reduce instructional continuity, undermine academic engagement, and elevate the likelihood of exclusionary discipline.

1.5 Recommendations

Recommended Analytic Framework

To meet the Board's expectations, LACOE and the collaborating agencies must adopt a research grounded analytic model that includes the following components:

1. Longitudinal trend analysis of suspension and chronic absenteeism rates for each facility from 2014 to 2015 through 2023 to 2024.
2. Disaggregation by race, ethnicity, gender, disability status, English learner status, prior school history, and prior suspension history.
3. Identification of suspensions initiated by probation personnel and substitute teachers with documented justification for each incident.
4. Calculation of instructional time lost by facility, by semester, and by student group.
5. Examination of school climate variables including staff turnover, substitute usage, escort delays, and program instability that shape engagement and behavior.
6. Integration of engagement theory to explain why patterns emerge and how instructional relevance shapes disciplinary outcomes.

SMART Goals and Accountability Structure

Data Infrastructure Goal

Within ninety days, establish a data sharing agreement with an academic partner and provide clean, deidentified data for analysis. Completion of the agreement and data transfer will serve as the success indicator.

Public Reporting Goal

Within one hundred twenty days, publish an online discipline and attendance dashboard for all juvenile facilities with disaggregated data. Visibility of facility level trends will serve as the success indicator.

Instructional Relevance Goal

Within six months, implement a curriculum framework requiring project based learning, culturally meaningful instruction, and relevance based lesson planning in every juvenile classroom. Completion of teacher training and lesson plan audits will serve as the success indicator.

Suspension Reduction Goal

Within one year, each facility will adopt suspension reduction targets with quarterly monitoring. Written action plans and quarterly Board updates will serve as the success indicator.

Instructional Time Recovery Goal

Within six months, establish a standardized protocol ensuring immediate access to instruction, tutoring, and academic supports during all removals from class. Documented student schedules and recovery logs will serve as the success indicator.

1.6 Cross Reference to Appendix A, Appendix B, Appendix C

Conclusion

Mandate 1 requires LACOE to provide long overdue clarity regarding suspension and absenteeism patterns in juvenile facilities. Any meaningful response must integrate the theory of suspension grounded in engagement research and must recognize that exclusionary discipline reflects failures in instructional relevance, climate, consistency, and academic design. A data driven, research anchored, and measurable reform plan can transform the educational experience

of justice involved youth and align LACOE with the Board's expectations for accountability and equity.

Mandate 2. Minimize Harms of Exclusionary Discipline and Strengthen Positive Supports

Mandate 2 directs LACOE, the Department of Youth Development, the Probation Department, the POC, youth stakeholders, and youth-led organizations to revise discipline practices, remediate learning loss, implement restorative systems, and create instructional recovery spaces that minimize the harms of exclusionary discipline and strengthen positive supports.

2.1 Required Policy Review

The Board instructs all participating agencies to review and revise the Student Suspension Process in juvenile halls and camps to ensure clarity, accessibility, and the elimination of zero-tolerance policies. This review must include a clear outline of current discipline policy, the acts or deeds that warrant suspension, and the correspondence between violations and required interventions. The revised policy must draw from research that extends beyond violation-focused responses and prioritizes redirection to academic engagement, de-escalation strategies by classroom staff, and rapid reconciliation and conflict resolution between students and between students and staff.

2.2 Suspension Process Analysis

LACOE's written discipline policies outline a corrective, equitable, and restorative framework for responding to student misconduct. BP 5144.1 and AR 5144.1 establish that suspension must be used only when "other means of correction have failed," that disciplinary actions must be "fair, consistent, and nondiscriminatory," and that students must continue to receive academic instruction during any removal from class. The policies reference restorative justice, positive behavioral interventions, and academic engagement.

Actual practice in Los Padrinos does not reflect this policy framework. Suspensions often function as immediate removals driven by staffing shortages, substitute-led classrooms, and operational instability. Youth remain unclear about the suspension process, and staff apply procedures inconsistently and without the safeguard of "other means of correction." Youth seldom receive written explanations or clear definitions of behaviors that result in removal. The process remains inaccessible for youth with disabilities and youth who are English learners. Restorative and academic recovery components are rarely implemented. These inconsistencies

contradict LACOE's stated commitment to nondiscriminatory discipline and undermine due process.

The suspension process must be revised to incorporate:

1. Clear, youth-friendly definitions of behaviors warranting removal, written at accessible reading levels and translated into primary languages spoken in facilities.
2. Required sequences of "other means of correction," including redirection, restorative conversations, and opportunities for academic re-engagement.
3. Mandatory use of de-escalation strategies drawn from restorative, trauma-informed, and crisis-intervention models.
4. Rapid reconciliation protocols requiring conflict resolution between students and staff before the next instructional day.
5. Immediate academic access during removal, including tutoring, assignments, and credit-bearing work.
6. Prohibitions on automatic or prolonged removals, including removals driven by staffing shortages or escort limitations.
7. Training for all instructional and custody staff in restorative practices, conflict resolution, trauma-informed methods, and culturally responsive communication.
8. Facility-specific implementation guidelines for teachers, substitutes, probation staff, and administrators.

These reforms shift discipline from punitive responses to relational and instructional strategies that strengthen student self-regulation and reduce unnecessary removals.

2.3 Elimination of Zero Tolerance Practices

Zero-tolerance policies continue to influence discipline in juvenile facilities despite research demonstrating that zero-tolerance frameworks increase suspension rates, heighten racial disparities, reduce academic engagement, and elevate recidivism risks. The scholarly literature establishes that exclusionary discipline removes students from instruction without improving behavior and fails to address conditions contributing to conflict (Gregory et al., 2016; Anyon et al., 2016; Augustine et al., 2018).

Evidence-based alternatives must replace zero-tolerance approaches. Classroom staff must treat each incident as an opportunity to redirect youth back toward instruction. "Warm demander"

pedagogy shows that high expectations paired with high support reduces behavioral problems and strengthens belonging for Black and Brown youth (Bondy & Ross, 2008). Conflict-resolution research emphasizes rapid reconciliation among students and between students and staff to restore the learning environment (Wachtel, 2016). Trauma-informed studies show that youth in confinement benefit from predictable routines, calm verbal strategies, and opportunities to explain the conflict before consequences are imposed (Dorado et al., 2016).

A revised system must eliminate zero-tolerance responses and institutionalize engagement-centered, relationship-driven, and academically focused discipline structures.

2.4 Learning Gap Remediation

The Board requires the implementation of strategies to identify and remediate learning gaps resulting from disciplinary removals, frequent transitions, and instructional disruptions. Current practice in Los Padrinos falls short of this expectation. Tutors often enter classrooms during core instructional blocks, interrupting academic sequences for entire classes and replacing grade-level instruction with fragmented support. No structured system exists for after-school remediation, targeted tutoring, or extended-day intervention. Academic support in living units often occurs in recreational day rooms, where televisions and other distractions undermine academic focus. Research establishes that youth in detention enter confinement with significant gaps in reading, mathematics, and coursework completion. Instructional minutes alone do not close foundational gaps or support credit recovery (Education for Youth Under Formal Supervision of the Juvenile Justice System, 2019). Effective remediation requires explicit, skills-focused instruction delivered consistently (Benner et al., 2016; Gemignani, 1994).

High-dosage tutoring research shows that frequent, sustained tutoring sessions produce strong gains in literacy and mathematics. Best-practice models operate three to five times per week in sessions lasting at least 30–60 minutes, aligned with state standards and classroom pacing (Kraft, 2024). Computer-based instruction can support foundational skills but cannot replace personalized, teacher-guided instruction (Morris & Finnegan, 2008).

Research on correctional education emphasizes that tutoring must occur in academic spaces and be coordinated by certified teachers to ensure instructional continuity (Juvenile Justice Educational Enhancement Program, 2010).

Best-practice framework for learning-gap remediation

- **Diagnostic identification:** Intake assessments and periodic formative assessments must identify specific skill deficits.
- **Protected remediation time:** Tutoring must occur outside core instruction through after-school blocks, evening sessions, or structured weekend programming.
- **High-dosage tutoring:** Three to five weekly small-group or one-to-one sessions aligned with standards and skill gaps.
- **Standards-aligned computer-assisted instruction:** Computer-based learning must supplement, not replace, in-person tutoring.
- **Academic environment:** Tutoring must occur in instructional spaces, not recreational rooms.
- **Teacher-led systems:** Certified teachers must lead remediation with coordinated support from tutors and paraprofessionals.
- **Shift from minutes to mastery:** Progress must be measured by standards mastery, credit recovery, and documented skill growth.

A mastery-driven, evidence-based remediation system is essential to address learning loss linked to disciplinary removals and instability within juvenile facilities.

2.5 Restorative Practices, Mentorship, Wraparound Supports, Tutoring, and Meaning-Based Interventions

The Board requires a restorative justice implementation plan that incorporates restorative practices, mentorship, wrap-around supports, tutoring, and meaning-based interventions with input from external stakeholders. Current practice within Los Padrinos remains fragmented. LACOE has not operationalized a cohesive restorative framework, and restorative components remain disconnected across classrooms, service providers, and mental health teams.

Research shows that restorative justice succeeds when adults share common definitions, expectations, and responsibility for repairing harm (Gregory et al., 2016). Effective systems require structured collaboration among teachers, probation staff, mental health teams, credible messengers, and community-based organizations.

Wrap-around supports are misaligned with academic systems. Trauma-informed schooling research emphasizes that youth benefit from unified academic, behavioral, and emotional

supports rooted in predictable routines and strong adult relationships (Dorado et al., 2016). Mentorship remains inconsistent despite evidence that supportive relationships strengthen identity, engagement, and behavioral stability (Bondy & Ross, 2008).

Meaning-based interventions, which help youth connect learning and behavior to identity, purpose, and community contribution, remain largely absent. Evidence shows that purpose-driven interventions increase engagement and reduce oppositional behaviors (Gregory et al., 2016).

Expanded recommendations

- Establish a standing Restorative Justice Advisory Council with credible messengers and community organizations (Augustine et al., 2018).
- Conduct multidisciplinary planning sessions to align academic, behavioral, and emotional supports (Dorado et al., 2016).
- Implement daily restorative circles and guided conflict-reconciliation sessions (Gregory et al., 2016).
- Expand structured mentorship programs with trained adult mentors (Bondy & Ross, 2008).
- Integrate meaning-based interventions that strengthen identity and purpose (Gregory et al., 2016).
- Provide trauma-informed and culturally responsive training to instructional staff and probation staff (Dorado et al., 2016).

2.6 Opportunity Rooms

Opportunity Rooms serve as academic and emotional recovery spaces that prevent unnecessary suspensions and support youth in returning to class ready to learn. At Los Padrinos, this intervention previously existed in the form of the Wellness Center, a dedicated stabilization and academic recovery space operated by a competent and effective Wellness Counselor skilled in de-escalation, emotional regulation, and relationship-based conflict resolution. The Wellness Center functioned as a calm, predictable environment that supported youth in reflection, regulation, and completion of academic tasks before reentering the classroom. The loss of both the Wellness Center and the Wellness Counselor resulted from mismanagement by LACOE and

the Probation Department. This removal eliminated one of the only interventions aligned with national best practice in trauma-informed education (Dorado et al., 2016).

LACOE has not implemented consistent standards for the creation, staffing, or operation of Opportunity Rooms across its juvenile facilities. In the absence of this structured recovery space, youth experiencing conflict or emotional escalation are frequently relocated to day rooms equipped with televisions and recreational distractions. These environments contradict all core principles of trauma-informed practice and academic recovery, which require quiet, predictable, and purposefully structured environments to support emotional stabilization and sustained engagement in learning.

Expanded recommendations

- Reestablish Opportunity Rooms as academic and emotional stabilization environments (Dorado et al., 2016).
- Staff each room with personnel trained in restorative dialogue and de-escalation (Gregory et al., 2016).
- Use structured entry and exit protocols including reflection, relationship repair, and academic completion.
- Equip rooms with grade-level materials and teacher-monitored computer-based tools (Morris & Finnegan, 2008).
- Maintain physical separation from recreational areas.
- Integrate Opportunity Rooms into the broader restorative justice plan (Augustine et al., 2018).

2.7 Cross Reference to Appendix A, Appendix B, and Appendix C

- **Appendix A:** SMART Goal Implementation Framework
- **Appendix B:** Staffing and Fiscal Resource Projections
- **Appendix C:** Quarterly Reporting Template

Mandate 3. Full Implementation of the Education Justice Coalition August 2025 Report

The Board instructs the LACOE Superintendent, in collaboration with the Chief Probation Officer, to review and implement the Education Justice Coalition’s August 2025 report and its eighteen recommendations, with particular attention to academic intervention, college and career preparation, and special education. The Board also requires a written status report within ninety days on remediation efforts and action steps.

Taken as a whole, the eighteen recommendations require every incarcerated student to receive a rigorous, A–G aligned, standards-based education that leads to a diploma and viable postsecondary options. This mandate also requires that every classroom be staffed by a fully credentialed and highly qualified teacher rather than a rotating series of substitutes or vacant positions. State regulations already require juvenile court schools to provide a standards-based curriculum that prepares youth for graduation, career entry, and postsecondary education (California Department of Education; California Code of Regulations, Title 15, section 1370). LACOE’s current practice in Los Padrinos and other juvenile facilities does not meet these expectations and falls short of the Coalition’s recommendations and legal requirements.

3.1 Full Review of All EJC Recommendations

The mandate requires a complete and systematic review of the eighteen Education Justice Coalition recommendations. LACOE has not yet demonstrated the organizational capacity required to conduct a meaningful systemic analysis. Jackson’s August and December 2023 reports documented leadership fragmentation, disorganized data systems, and the absence of basic operational structures needed for review, reflection, and corrective action (Jackson, 2023a; Jackson, 2023b).

A meaningful review must include cross-agency collaboration, shared accountability between LACOE and Probation, structured involvement of youth and families, and countywide evaluation of instructional and operational conditions across all juvenile facilities. Research on juvenile justice education reform confirms that transparent governance, cross-agency partnerships, and structured planning are foundational to successful improvement in correctional education settings (Houchins et al., 2012; Education for Youth Under Formal Supervision of the Juvenile Justice System, 2019).

A complete review must include:

- A detailed analysis of all eighteen EJC recommendations
- Participation from youth, families, site educators, and community partners
- Cross-agency engagement with mental health, probation, and reentry teams
- Facility-level data on instruction, staffing, and student progress
- A public reporting structure to ensure transparency and accountability

These elements represent baseline conditions for compliance and must appear in LACOE's report to the Board.

3.2 Written Implementation Plan

The mandate requires a written implementation plan with timelines, benchmarks, and assigned responsibilities. Jackson's December 2023 report documented that LACOE lacked the implementation plans, pacing guides, leadership structures, and instructional monitoring systems necessary to carry out the EJC recommendations (Jackson, 2023b).

The implementation plan must include:

- Benchmarks for instruction, staffing, special education, mental health, community partnerships, academic intervention, and reentry
- Assigned responsibility for each recommendation
- Timelines for immediate, six-month, and twelve-month implementation
- Staffing requirements and fiscal resource projections
- Quarterly reporting cycles aligned with Board oversight

The SMART Goal Implementation Framework for Mandate 3 appears in Appendix A, which operationalizes each recommendation through specific, measurable, attainable, relevant, and time-bound goals. Staffing and fiscal resource requirements appear in Appendix B, and the quarterly reporting template required for Board oversight appears in Appendix C.

3.3 Academic Intervention Services

The mandate requires structured academic intervention services, including literacy and mathematics intervention, credit recovery, college readiness, and preparation for vocational pathways. Jackson's August 2023 analysis found that Los Padrinós lacked diagnostic assessments, structured intervention blocks, qualified teachers to deliver intervention, and

aligned credit recovery systems (Jackson, 2023a). Existing instruction did not support mastery of California content standards, particularly in literacy and mathematics.

Research confirms that youth in correctional settings often perform two to five years below grade level and require daily small-group instruction, diagnostic-driven intervention, scaffolded literacy and mathematics support, and standards-aligned credit recovery delivered by credentialed educators (Benner et al., 2016). Effective mathematics instruction requires standards-based curriculum, applied problem-solving, and explicit foundational instruction. Literacy support requires structured reading intervention, vocabulary development, fluency practice, and guided writing.

The Coalition's recommendations also require robust college and vocational preparation. Youth must have access to college readiness instruction, community college pathways, industry-recognized credentials, and structured counseling. Current LACOE practice does not meet these requirements. Instructional fragments, inconsistent intervention, misaligned credit recovery, limited access to foreign language, and the absence of college readiness programming represent clear violations of the Coalition's expectations and state standards.

3.4 Special Education Services

The mandate requires full implementation of all special education services and accommodations, including assessments, IEP implementation, progress monitoring, and compensatory education. Jackson's 2023 analyses documented persistent deficiencies, including unfilled special education positions, inconsistent service delivery, missing IEP documentation, incomplete evaluations, and limited collaboration between general and special education teachers (Jackson, 2023a; Jackson, 2023b).

Research shows that a significant proportion of youth in juvenile facilities have disabilities requiring specialized instruction, related services, and coordinated support (National Council on Disability, 2015). Effective special education programs require:

- Consistent staffing of special education teachers and school psychologists
- Delivery of related services as required by IEPs
- Regular progress monitoring
- Compensatory education for missed services
- Structured collaboration with general education teachers

LACOE has not met these requirements. The absence of qualified service providers and consistent instructional delivery demonstrates noncompliance with federal and state law and contradicts the EJC recommendations.

3.5 Transition Planning and Instructional Continuity

The EJC recommendations emphasize transition planning, reentry coordination, financial literacy, and continuity of education. Research confirms that structured reentry systems and cross-agency coordination significantly improve long-term educational outcomes and reduce recidivism (Owens and McLanahan, 2020; Houchins et al., 2012). State law requires immediate enrollment, continuity of instruction, timely record transfer, and joint transition planning when students move between juvenile court schools and community schools (Education Code section 48647).

Los Padrinos operated with insufficient transition counseling. Jackson's December 2023 analysis documented that LACOE and Probation operated with the mistaken belief that educational responsibility ended at release (Jackson, 2023b). This mindset contradicts best practice. Youth require structured transition planning, coordinated case management, specialized counselors who follow them across settings, data sharing across agencies, financial literacy instruction, vocational planning, college readiness support, and sustained post-release monitoring. The Coalition's recommendations call for an integrated reentry planning system and robust coordination with community-based organizations. LACOE lacks the infrastructure to provide these services. Staffing and fiscal requirements for a compliant transition system appear in Appendix B.

3.6 Cross Reference to Appendix A, Appendix B, Appendix C

- **Appendix A:** SMART Goal Implementation Framework for Mandate 3
- **Appendix B:** Staffing and Fiscal Resource Projections
- **Appendix C:** Quarterly Reporting Template for Board Oversight

Mandate 4. Establish and Empower Youth Led Councils in Every Facility

The Board directs the Los Angeles County Office of Education, the Department of Youth Development, and the Probation Department to establish youth led councils in every juvenile facility. These councils must meet regularly, include community based organizations or credible messenger representatives, and maintain a formal process for elevating recommendations to leadership. The Board requires that youth recommendations be forwarded to the Probation Oversight Commission, which will meet consistently with LACOE and Probation to review and provide feedback.

National research demonstrates that authentic youth voice improves institutional climate, strengthens engagement, and increases the effectiveness of school and justice programming (Mitra, 2018; Zeldin et al., 2013). Youth led councils create structured space for young people to engage in decision making, articulate needs, and influence systems that directly affect their education and well-being. Scholarship in positive youth development establishes that agency, belonging, and contribution serve as protective factors that reduce disengagement and behavioral escalation, particularly for youth who have experienced exclusion, trauma, and instability (Search Institute, 2022; OJJDP, 2023).

National best practices indicate that juvenile education and justice programs perform more effectively when youth serve as active contributors rather than passive recipients (Annie E. Casey Foundation, 2021). Youth advisory councils promote trauma informed communication, peer leadership, restorative dialogue, conflict resolution, and developmental relationships that support healthy identity formation (Wong et al., 2010; González, 2015). These structures also provide administrators with direct insight into school climate, instructional barriers, resource deficits, and operational issues that youth uniquely experience.

Despite these standards, LACOE has not institutionalized youth councils across its facilities. No countywide policy, training structure, or implementation plan exists to ensure youth representation or participatory governance. Findings from Los Padrinos confirm the absence of consistent practice. Youth repeatedly reported confusion regarding school expectations, credit accumulation, graduation pathways, discipline policies, and instructional schedules. LACOE lacked formal communication structures for surfacing these concerns, which contributed to misunderstanding, frustration, and disengagement.

Los Padrinos offered one partial example of youth participation through its School Site Council only because the Chair, educator David Olivares, independently included students. Youth participated in school-level issues because an individual teacher created access rather than because LACOE maintained a countywide standard. No policy required student representation, and no system ensured equitable opportunities across facilities. This example reveals the potential of youth voice while highlighting LACOE's reliance on individual initiative rather than organizational commitment.

National scholarship warns that institutions without structured avenues for youth voice inadvertently contribute to confusion, alienation, and increased behavioral escalation (Barnert et al., 2019; Justice for Families, 2020). Youth councils function as corrective mechanisms that align practice with evidence-based standards.

4.1 Structure and Purpose of Youth Councils

Youth led councils must operate as formal governance structures that give detained youth a meaningful role in shaping school climate, instructional quality, behavioral systems, and daily operations. Structured opportunities for expression promote emotional safety and reduce behavioral escalation. Councils must meet at least twice monthly and use consistent agendas, facilitative leadership, and documentation. Predictable and structured meetings support trauma informed practice and contribute to a healthy school climate (Substance Abuse and Mental Health Services Administration, 2014).

The purpose of youth councils is to create a sustained mechanism for youth to elevate concerns, identify solutions, and partner with leadership. This participatory approach aligns with national standards that emphasize agency, voice, and contribution as core components of healthy adolescent development (Search Institute, 2022).

4.2 Evidence Base for Youth Voice

Research on youth voice, youth adult partnerships, and positive youth development provides a strong evidence base for youth councils. Studies consistently find that youth involvement improves program design, reduces conflict, increases engagement, and strengthens school climate (Mitra, 2018; Zeldin et al., 2013). Youth participation promotes agency, belonging, and

contribution, which function as developmental assets tied to improved academic engagement and behavioral outcomes.

Juvenile justice research emphasizes that programs grounded in authentic youth voice reduce disciplinary incidents and increase the effectiveness of educational and rehabilitative services (Annie E. Casey Foundation, 2021). Youth leadership structures also promote trauma informed communication, peer mediation, restorative dialogue, and collective problem-solving (Wong et al., 2010; González, 2015).

Institutions without youth voice structures contribute to confusion, alienation, and increased behavioral escalation (Barnert et al., 2019; Justice for Families, 2020). Youth councils correct these systemic weaknesses and align facilities with national standards for equitable, developmentally appropriate practice.

4.3 Operational Requirements

Effective youth councils must follow clear and consistent operational requirements:

- **Regular meetings** held at least twice monthly with formal agendas, trained facilitation, and written minutes.
- **Participation from credible messengers or community based organizations**, consistent with national credible messenger practices, to support communication, mentoring, and articulation of youth recommendations (Credible Messenger Justice Center, 2021).
- **Formal mechanisms for elevating recommendations**, including written submissions to school leadership, facility leadership, DYD, and the POC. Research shows that transparent feedback loops strengthen accountability and improve follow through (Zeldin et al., 2015).
- **Integration with instructional and behavioral systems**, allowing youth to contribute to decisions about school climate, restorative practices, academic access, intervention needs, and operations that shape learning. Studies confirm that youth involvement in these decisions reduces disciplinary conflict and increases academic equity (Gregory et al., 2016; González, 2015).
- **Confidentiality and emotional safety protocols** to ensure that youth feel secure when sharing concerns and contributing to decision making.

These requirements establish the operational backbone of a countywide youth council system.

4.4 Leadership Responsibilities

LACOE or the contracted educational organization must designate a trained youth council facilitator responsible for coordination, communication, and structural consistency across all facilities. Leadership must:

- Provide youth friendly materials that explain the responsibilities and rights associated with participation.
- Ensure consistent training for facilitators, staff, and youth participants.
- Maintain confidentiality protections that promote emotional safety.
- Document action plans, meeting minutes, and implementation steps.
- Support youth presentations to the POC and ensure that youth recommendations receive written responses.

Scholarship on youth adult partnerships emphasizes that adult facilitation determines the authenticity, equity, and structural integrity of youth voice (Mitra, 2018). Leadership must therefore treat youth councils as formal partners in continuous improvement and align countywide practices with national models.

4.5 Cross Reference to Appendix A, Appendix B, Appendix C

- **Appendix A:** SMART Goal Implementation Framework
- **Appendix B:** Staffing and Fiscal Resource Projections
- **Appendix C:** Quarterly Reporting Template for Board Oversight

Mandate 5. Comprehensive Assessment of the School to Prison Nexus

The Board requires LACOE, the Probation Department, the Department of Youth Development, the Commission for Children and Families, the Probation Oversight Commission, the Department of Mental Health, and all relevant county stakeholders to complete a comprehensive, cross agency assessment of the school to prison nexus within one hundred twenty days. This assessment must identify systemic drivers of youth incarceration, analyze the educational and disciplinary histories of incarcerated youth, determine which schools and regions disproportionately send youth into Probation custody, assess regional and facility level resource gaps, and provide recommendations for systemic intervention.

This mandate reflects national concern that exclusionary school practices, inadequate support services, fragmented systems, and inconsistent educational quality represent major contributors to long term justice involvement (Owens and McLanahan, 2020). Jackson's dissertation research on leadership practices influencing recidivism across Southern California's juvenile justice system confirms this pattern and emphasizes the critical role of cross agency collaboration and coordinated case management.

5.1 Required Analysis

The mandated analysis must examine the long term pattern through which youth move from school based difficulty into the juvenile justice system. A complete analysis requires the integration of:

- school discipline records
- suspension and expulsion history
- chronic absenteeism data
- academic performance indicators
- special education eligibility and services
- mental health history
- probation records
- community level socio economic indicators

Current conditions indicate that LACOE does not maintain a centralized, integrated data system connecting these domains. Jackson's December 2023 analysis documented that Los Padrinós lacked a cohesive credit tracking system, did not consistently document instruction received or missed, did not track tutoring or intervention delivery, and did not maintain systems reflecting youth progress across school transitions. Without an integrated countywide data system, systemic inequities remain hidden.

A complete analysis must also focus on patterns rather than isolated incidents. Youth repeatedly described cycles of suspension, academic disengagement, misinformation about graduation pathways, and re enrollment difficulties preceding system involvement. These experiences align with national studies demonstrating that fragmented schooling and repeated school exclusion are major predictors of later incarceration (Houchins et al., 2012).

5.2 School Level and District Level Factors

The Board requires an examination of district level policies and school level conditions that contribute to youth incarceration. This includes:

- exclusionary discipline practices
- inconsistent implementation of positive behavioral supports
- lack of culturally sustaining instruction
- insufficient early intervention systems
- limited mental health access
- misidentification or under identification of disability
- failure to monitor and address chronic absenteeism

Jackson's dissertation findings confirm that leadership at district, county, and facility levels often fails to intervene early, fails to monitor educational progress effectively, and fails to coordinate across agencies. Districts that rely on punitive responses, lack intervention infrastructure, or fail to support struggling students contribute directly to the upstream expansion of the school to prison pipeline.

5.3 Student Histories of Suspensions, Expulsions, Absenteeism, and Recidivism

The Board requires analysis of the educational histories of youth who enter custody with documented patterns of:

- multiple suspensions
- expulsions
- chronic absenteeism
- academic failure
- reentry instability
- recidivism

Jackson's dissertation interviews with senior leaders in probation, education, mental health, and reentry identified inconsistent early intervention as a structural driver of recidivism. Leaders described youth entering custody with years of fragmented instruction, credit loss, unclear graduation pathways, untreated trauma, and incomplete special education evaluations. Without coordinated, early intervention, youth cycled repeatedly through detention.

This section of the mandated report requires:

- integration of school discipline and probation data
- analysis of patterns across districts and regions
- identification of youth repeatedly excluded from school
- examination of chronic absenteeism prior to incarceration
- documentation of interventions attempted or omitted

The assessment must recognize that preventable educational failures escalate into justice involvement when systems operate in isolation.

5.4 Disproportionate Pathways to Probation

The mandate requires identification of schools and regions that send youth into custody at disproportionate rates. This analysis must include disaggregation by:

- zip code
- race and ethnicity
- disability status
- gender
- socioeconomic indicators
- school district
- school type

Research consistently demonstrates that youth of color, youth with disabilities, homeless youth, foster youth, and English learners experience higher rates of school exclusion and justice involvement (National Council on Disability, 2015). Jackson's dissertation found that senior leaders identified community instability, gaps in school based services, and inconsistent leadership responses as major contributors to regional disparities.

This section of the report must include mapping tools and geographic analysis that identify hot spots of educational exclusion and justice involvement across the county.

5.5 Resource Gaps

The mandate requires identification of resource gaps that contribute to inequities across regions and facilities. These gaps include:

- insufficient credentialed teachers
- inadequate mental health staffing
- limited behavioral support personnel
- incomplete special education evaluations
- lack of structured intervention programs
- scarcity of community based partnerships
- poor access to tutoring and credit recovery
- absence of coordinated reentry case management
- limited data analytics capacity

Jackson's August and December 2023 analyses documented that Los Padrinos lacked staffing in special education, transition services, credentialed instruction, behavioral support, and mental health services for extended periods. Leadership treated staffing shortages as logistical inconveniences rather than civil rights violations. These deficiencies contributed directly to academic disengagement and recidivism.

The Education Justice Coalition report identifies the same failures across LACOE-operated facilities, confirming that these issues are systemic rather than isolated.

5.6 National Best Practices for Interrupting the School to Prison Pipeline

National research across university centers, state agencies, and federal organizations demonstrates that the school to prison pipeline can be interrupted through comprehensive,

evidence based educational and behavioral systems. Studies conducted by the Office of Juvenile Justice and Delinquency Prevention confirm that early intervention, standards aligned academic programming, and coordinated case management reduce long term justice involvement (OJJDP, 2023; Education for Youth Under Formal Supervision of the Juvenile Justice System, 2019).

Research from the National Council on Disability demonstrates that consistent mental health services, timely special education evaluation, and access to high quality instruction serve as protective factors for youth with disabilities who are disproportionately at risk of incarceration (National Council on Disability, 2015).

University based studies provide further evidence that stable academic programming and trauma informed educational environments reduce behavioral escalation and prevent later system involvement. Research conducted by Benner and colleagues shows that rigorous instructional models, explicit intervention systems, and credentialed teacher staffing produce measurable academic gains in detention settings and reduce recidivism (Benner et al., 2016). Studies in urban education contexts demonstrate that culturally sustaining instruction, restorative practices, and strong community partnerships strengthen engagement and reduce exclusionary discipline, which decreases the likelihood of court involvement (González, 2015; Mitra, 2018).

State and national research also demonstrates that youth benefit when agencies collaborate to provide coordinated support. Studies show that cross agency collaboration, integrated behavioral and academic systems, and structured transition planning reduce recidivism and increase educational continuity after release (Owens and McLanahan, 2020; Annie E. Casey Foundation, 2021). These findings align with national frameworks emphasizing the importance of continuous reentry support, mentoring, and cognitive behavioral interventions that address both academic and social emotional needs (Wong et al., 2010; Zeldin et al., 2013).

Taken together, national research identifies the following components as essential to interrupting the school to prison pipeline:

- early intervention in school settings
- consistent mental health and behavioral support
- stable and standards aligned academic programming
- cross agency collaboration
- trauma informed educational leadership
- coordinated case management

- mentoring and cognitive behavioral supports
- clear and monitored graduation pathways
- meaningful partnerships with community organizations
- structured transition and reentry planning

These evidence based strategies provide a national blueprint for countywide reform and must guide the comprehensive assessment required by Mandate 5.

Programs such as Total Quality Training provide integrated case management, mentoring, cognitive behavioral strategies, academic monitoring, reentry preparation, and cross agency coordination. This model demonstrates how external partners can support educational continuity and reduce recidivism.

The mandated report must align the county's strategy with these evidence based frameworks and incorporate national best practices into system-wide reform.

Cross Reference to Appendix A, Appendix B, Appendix C

Mandate 5 aligns with:

- **Appendix A:** SMART Goals for data integration, case management, reentry, cross agency collaboration, and monitoring of school to prison indicators
- **Appendix B:** Staffing projections for transition counselors, case managers, mental health providers, behavioral specialists, and data analysts
- **Appendix C:** Quarterly reporting indicators for school to prison metrics, intervention participation, reentry outcomes, and disparities

APPENDIX A. SMART GOAL IMPLEMENTATION FRAMEWORK

Appendix A contains four Major SMART Goals and thirty five SMART Sub Goals, aligned with Mandates 1–5, the EJC recommendations, and the structural failures identified by Jackson in August and December 2023.

APPENDIX A SMART GOAL IMPLEMENTATION FRAMEWORK

This appendix operationalizes all reforms required by the Los Angeles County Board of Supervisors across the five mandates. Each SMART Goal specifies clear actions, measurable indicators, responsible entities, and timelines. All accountability is assigned to LACOE or the contracted educational organization providing services, in alignment with the Board’s directive that education partners must guarantee consistent implementation across all juvenile facilities.

MAJOR SMART GOAL 1

Implement a Countywide A–G and Standards Based Instructional System

Sub Goal 1.1: Develop a Countywide Suspension and Absenteeism Dashboard

Specific: Establish a real time digital dashboard tracking suspensions, reasons, duration, instructional minutes lost, chronic absenteeism, demographic disparities, and probation initiated removals.

Measurable: Dashboard displays daily, weekly, and monthly data; quarterly reports submitted to the POC.

Achievable: Data is collected through attendance systems, referral logs, and escort tracking.

Relevant: Supports Mandate 1 requirements for transparency, root cause analysis, and instructional access.

Time Bound: Fully operational within 120 days.

Sub Goal 1.2: Implement Root Cause Engagement Practices

Specific: Train teachers in project based learning, culturally sustaining pedagogy, and collaborative instructional models.

Measurable: Eighty percent of teachers demonstrate implementation through lesson plans and observations.

Time Bound: Training completed within six months.

Relevant: Reduces suspension and disengagement (Mandate 1).

Sub Goal 1.3: Establish a Countywide A–G Aligned Course Sequence

Specific: Provide youth access to a full A–G sequence regardless of facility assignment.

Measurable: Course availability documented quarterly; student enrollment tracked.

Relevant: Aligns with EJC Recommendations 1, 2, 3, and 4.

Time Bound: Full alignment within twelve months.

Sub Goal 1.4: Standards Aligned Project Based Learning Implementation

Specific: Require that all project based learning units include explicit California standards and mastery criteria.

Measurable: Ninety percent of submitted units show alignment.

Relevant: Prevents worksheet based instruction documented by Jackson in 2023.

Time Bound: Six months.

Sub Goal 1.5: Provide Foreign Language Instruction

Specific: Staff at least one credentialed foreign language teacher per facility.

Measurable: Course rosters, schedules, and student assessments.

Relevant: Supports A–G readiness.

Time Bound: Twelve months.

Sub Goal 1.6: Ensure Curriculum Equity Across Facilities

Specific: Adopt a unified curriculum across all county facilities.

Measurable: Curriculum audits completed quarterly.

Relevant: Addresses disparities identified in Mandate 5.

Time Bound: Six months.

Sub Goal 1.7: Maintain Instructional Continuity During Lockdowns

Specific: Implement plans that guarantee grade level instruction during quarantines, unit lockdowns, and staffing shortages.

Measurable: Continuity plans audited monthly.

Relevant: Required under Mandate 3 and supported by national guidelines.

Time Bound: Ninety days.

MAJOR SMART GOAL 2

Ensure Fully Credentialed Teachers and Adequate Staffing

Sub Goal 2.1: Achieve One Hundred Percent Credential Coverage

Specific: Staff all classes with appropriately credentialed teachers.

Measurable: Staffing audit demonstrates one hundred percent coverage.

Time Bound: Twelve months.

Relevant: Required by EJC Recommendations 5 and 6.

Sub Goal 2.2: Full Compliance With IDEA Requirements

Specific: Ensure IEP implementation fidelity, related service delivery, special education evaluations, and compensatory services.

Measurable: Weekly and monthly documentation logs.

Time Bound: Ninety days.

Relevant: Required under Mandate 3.

Sub Goal 2.3: Staff Mental Health Services at Appropriate Ratios

Specific: Assign one clinician for every twenty five students.

Measurable: Staffing reports.

Time Bound: Six months.

Relevant: Mandate 5 requires integrated behavioral and mental health supports.

Sub Goal 2.4: Staff Behavior Intervention Specialists

Specific: Assign intervention specialists to support de-escalation and restorative practices.

Measurable: Incident logs show reduced classroom removals.

Time Bound: Six months.

Sub Goal 2.5: Annual Trauma Informed Training for All Staff

Specific: Provide countywide training in trauma informed practice and youth development.

Measurable: Completion logs and observation cycles.

Time Bound: Annually.

Sub Goal 2.6: Implement Recruitment and Retention Incentives

Specific: Establish incentives for hard to staff positions.

Measurable: Reduction in vacancy rates.

Time Bound: Twelve months.

MAJOR SMART GOAL 3

Build an Integrated System of Academic, Behavioral, Mental Health, and Special Education Supports

Sub Goal 3.1: Implement a Multi Tiered System of Support (MTSS)

Specific: Integrate academic, behavioral, and mental health interventions across all facilities.

Measurable: Tier assignment, intervention logs, and progress monitoring reports.

Time Bound: Twelve months.

Sub Goal 3.2: Establish Countywide Restorative Practices

Specific: Adopt restorative circles, mediation structures, and harm repair protocols.

Measurable: Reduction in suspensions and classroom removals.

Time Bound: Six months.

Sub Goal 3.3: Integrate Mentorship and Wraparound Supports

Specific: Partner with community organizations and mentoring providers to support youth.

Measurable: Participation logs and youth surveys.

Time Bound: Three months.

Sub Goal 3.4: Provide Daily Tutoring and Remediation

Specific: Offer one to one or small group tutoring at least three times weekly outside instructional hours.

Measurable: Intervention logs; mastery checks.

Time Bound: Ninety days.

Sub Goal 3.5: Establish Academic Case Management

Specific: Assign each youth an individualized academic plan monitored weekly.

Measurable: Case notes and academic progress reports.

Time Bound: Thirty days after intake.

Sub Goal 3.6: Implement Integrated Data Systems

Specific: Track instructional access, discipline, IEP compliance, mental health services, and reentry progress.

Measurable: Monthly data summaries.

Time Bound: Six months.

MAJOR SMART GOAL 4

Establish a Comprehensive Transition, Reentry, and Youth Leadership System

Sub Goal 4.1: Develop Individual Reentry Plans for All Youth

Specific: Create a reentry plan thirty days before release for each youth.

Measurable: Documentation audits.

Time Bound: Immediate.

Sub Goal 4.2: Implement Cross Agency Case Management

Specific: Establish a unified case management system integrating education, probation, mental health, and community services.

Measurable: Case management logs.

Time Bound: Six months.

Sub Goal 4.3: Establish Youth Led Councils

Specific: Create youth councils that meet twice monthly.

Measurable: Meeting minutes and action plans.

Time Bound: Ninety days.

Sub Goal 4.4: Integrate CBO and Credible Messenger Participation

Specific: Ensure every youth council includes a CBO or credible messenger representative.

Measurable: Participation logs.

Time Bound: Ninety days.

Sub Goal 4.5: Track School to Prison Indicators

Specific: Document histories of suspension, expulsion, absenteeism, and recidivism.

Measurable: Quarterly reports.

Time Bound: Six months.

Sub Goal 4.6: Implement Family Engagement Structures

Specific: Hold quarterly family engagement meetings.

Measurable: Attendance logs and follow up notes.

Time Bound: Quarterly.

APPENDIX B

Staffing and Fiscal Resource Projections

Appendix B translates the structural requirements of **Mandates 1–5** into specific staffing and fiscal projections. These projections reflect national best practices, the recommendations of the Education Justice Coalition, and the deficiencies documented by Jackson in his August 2023 and December 2023 analyses of Los Padrinos.

APPENDIX B

Staffing and Fiscal Resource Projections

Appendix B outlines the staffing infrastructure and fiscal resources required to implement the SMART goals and reform mandates. Each category identifies minimum staffing ratios, essential positions, and estimated fiscal impacts across facilities. These projections reflect the operational realities of juvenile education, including the need for consistent instructional access, intensive intervention, robust special education services, mental health supports, transition planning, and youth voice structures.

All responsibilities identified in this appendix are assigned to LACOE or the contracted educational organization providing services, consistent with the Board’s directives.

1. Instructional Staffing Requirements

1.1 Credentialed Teachers

Each facility must ensure that core academic instruction is delivered by fully credentialed teachers. The recommended ratio is one credentialed teacher per classroom, with facilities offering:

- English Language Arts
- Mathematics
- Science
- Social Science
- Career Technical Education
- Foreign Language

Fiscal Projection:

Annual cost per credentialed teacher ranges from one hundred ten thousand to one hundred thirty thousand dollars, including salary and benefits. Facilities with persistent vacancies must allocate funds for recruitment bonuses, retention incentives, and hard to staff stipends.

1.2 Special Education Teachers

Special education teachers must support youth receiving services under the Individuals with Disabilities Education Act. A ratio of one special education teacher per twelve students is required to ensure appropriate service delivery, progress monitoring, and compliance.

Fiscal Projection:

Annual cost ranges from one hundred fifteen thousand to one hundred forty thousand dollars per position.

1.3 Instructional Coaches and Curriculum Specialists

Each facility must assign instructional coaches to support teachers in:

- standards aligned instruction
- project based learning
- culturally sustaining pedagogy
- trauma informed classroom practice
- progress monitoring

Fiscal Projection:

One instructional coach per facility at an estimated cost of one hundred twenty thousand dollars annually.

2. Special Education and Related Services**2.1 School Psychologists**

School psychologists must complete evaluations, conduct functional behavioral assessments, support mental health needs, and contribute to multidisciplinary teams. A ratio of one psychologist per seventy five students is recommended.

Fiscal Projection:

One hundred twenty thousand to one hundred fifty thousand dollars per psychologist annually.

2.2 Speech and Language Providers, Occupational Therapists, and ERICS Providers

These staff must deliver all related services required by IEPs. Facilities must budget for:

- speech services
- occupational therapy
- educationally related intensive counseling services

Fiscal Projection:

Ten to fifteen percent budget increase for full compliance with IDEA related services.

2.3 Special Education Compliance Specialists

Compliance specialists monitor IEP implementation, service delivery, and documentation. Each facility requires one specialist.

Fiscal Projection:

Ninety thousand to one hundred ten thousand dollars annually.

3. Mental Health and Behavioral Support Staffing

3.1 Licensed Clinical Social Workers or Marriage and Family Therapists

The recommended ratio is one mental health clinician per twenty five youth. These staff provide counseling, crisis support, suicide prevention, and trauma informed intervention.

Fiscal Projection:

One hundred thousand to one hundred twenty thousand dollars per clinician annually.

3.2 Behavior Intervention Specialists

Specialists support de escalation, restorative practices, conflict mediation, and implementation of the Multi Tiered System of Support.

Fiscal Projection:

Eighty five thousand to one hundred thousand dollars annually per specialist.

One specialist should serve each cluster of classrooms.

3.3 Restorative Practices Facilitators

Facilities must staff trained professionals who coordinate circles, mediation, harm repair, and re entry conversations.

Fiscal Projection:

Seventy five thousand to ninety five thousand dollars annually.

4. Transition, Reentry, and Case Management Staffing

4.1 Transition Counselors

Transition counselors support graduation planning, school re enrollment, and continuity of education. The recommended ratio is one counselor per forty youth.

Fiscal Projection:

Ninety five thousand to one hundred ten thousand dollars annually per counselor.

4.2 Case Managers

Case managers provide academic, behavioral, and reentry case management. The recommended ratio is one case manager per twenty five youth. These positions are critical for implementing Mandate 5.

Fiscal Projection:

Seventy thousand to eighty five thousand dollars per case manager annually.

4.3 Workforce and Postsecondary Navigators

Each facility must staff one navigator who connects youth to community college, trade schools, workforce programs, and adult education.

Fiscal Projection:

Eighty five thousand to one hundred thousand dollars annually.

4.4 Records and Credit Analysts

Analysts ensure accurate credit tracking, transcript management, transfer documentation, and re enrollment packets.

Fiscal Projection:

Sixty five thousand to eighty thousand dollars annually.

5. Youth Leadership and Engagement Staffing

5.1 Youth Council Facilitators

The facilitator manages youth council meetings, supports youth participation, organizes communication with county agencies, and maintains documentation.

Fiscal Projection:

Seventy thousand to eighty five thousand dollars annually.

5.2 Community Based Organization Liaisons

The liaison connects youth councils and facilities with community partners and credible messengers. This role ensures that youth voices receive external support and continuity during transitions.

Fiscal Projection:

Seventy five thousand to ninety thousand dollars annually.

6. Data and Assessment Infrastructure

6.1 Data Analysts

Data analysts maintain integrated systems that track:

- instructional access
- suspensions
- absenteeism
- IEP compliance
- mental health and behavioral interventions
- tutoring and remediation
- reentry indicators
- school to prison metrics

These analysts ensure accuracy, transparency, and compliance with Mandates 1 and 5.

Fiscal Projection:

One analyst per facility at approximately one hundred thousand dollars annually.

6.2 Technology Infrastructure

Each facility requires secure platforms for:

- learning management systems
- student information systems
- IEP systems
- progress monitoring tools
- suspension and escort tracking
- credit tracking
- reentry case management systems

Fiscal Projection:

Three hundred thousand dollars annually per facility for licenses, hardware, data security, and maintenance.

7. Facility Level Administrative Capacity**7.1 Assistant Principals or Instructional Administrators**

Facilities must staff administrative positions responsible for:

- supervision of classroom instruction
- discipline oversight
- data analysis
- staff evaluation
- youth council integration
- support for special education compliance

Fiscal Projection:

One hundred twenty thousand to one hundred forty thousand dollars annually.

7.2 Professional Development Budget

Annual budget allocations must support:

- trauma informed training
- project based learning training
- restorative practices certification
- culturally sustaining pedagogy
- progress monitoring systems
- data analysis and decision making

Fiscal Projection:

Eighty thousand to one hundred thousand dollars annually per facility.

8. Summary of Fiscal Need

Full implementation of all staffing and resource requirements across Los Angeles County juvenile facilities will require a significant but essential investment. Costs vary by facility size but reflect the fundamental principle that educational equity for justice involved youth demands adequate professional staffing, integrated systems, and sustained oversight.

A comprehensive fiscal summary will appear in the final formatted version of the Board submission once the full document is assembled, if you would like it included as a consolidated budget table.

APPENDIX C**Quarterly Reporting Template for Board Oversight**

This appendix includes the metrics required to ensure full compliance, transparency, and continuous improvement.

APPENDIX C**Quarterly Reporting Template for Board Oversight**

Appendix C provides the monitoring structure the Board of Supervisors requires to ensure transparent, accurate, and timely reporting from LACOE or the contracted educational organization providing services. It aligns directly with the SMART Goals in Appendix A, the staffing and resource requirements in Appendix B, and all mandates issued by the Board.

Each quarterly report must be submitted to:

- The Board of Supervisors
- The Probation Oversight Commission
- The Department of Youth Development
- The Probation Department
- The Commission for Children and Families
- Relevant educational stakeholders

The template below defines the indicators that must be reported every quarter.

1. Instructional Quality and Access**1. Curriculum and Course Access**

- Number of A to G courses offered
- Number of youth enrolled in A to G courses
- Availability of foreign language instruction
- Implementation of standards aligned curriculum

2. Instructional Access

- Average number of instructional minutes provided per student per week
- Number of instructional minutes lost due to movement delays or staffing shortages

- Number of classes taught by credentialed vs. un-credentialed teachers
- Implementation of continuity of learning plans during lockdowns or quarantines

3. Instructional Monitoring

- Frequency of classroom observations
- Lesson plan submission and standards alignment
- Evidence of culturally sustaining instruction
- Project based learning implementation metrics

2. Staffing and Human Capital

1. Credentialed Teacher Coverage

- Percentage of classes staffed by credentialed teachers
- Number of unfilled positions
- Retention and vacancy rates

2. Special Education Staffing

- Percentage of IEP services delivered
- Number of overdue evaluations
- Documentation of compensatory services provided

3. Mental Health Staffing

- Clinician to student ratios
- Average caseload
- Types of mental health services delivered

4. Behavioral and Restorative Staffing

- Number of restorative facilitators, behavior intervention specialists, and de escalation staff
- Number of staff trained in trauma informed practice

3. Youth Engagement and Leadership

1. Youth Councils

- Number of youth council meetings held
- Number of youth participating
- Number of CBO or credible messenger representatives present

- Summary of recommendations made by youth
- Written response from facility leadership to youth recommendations

2. Student Participation in School Governance

- Number of youth involved in School Site Council or similar structures
- Leadership roles held by youth
- Documented contributions to program decisions

4. School Climate and Discipline

1. Suspension Metrics

- Total suspension incidents
- Reasons for suspensions
- Duration of each suspension
- Instructional minutes lost
- Demographic disparities in suspensions

2. Probation Initiated Removals

- Number of classroom removals initiated by probation staff
- Reasons for removal
- Whether removals met Education Code criteria

3. Restorative and Behavioral Interventions

- Number of restorative circles held
- Number of conflicts resolved without suspension
- Number of Opportunity Room entries
- Average duration of Opportunity Room visits
- Academic recovery activities provided

4. Classroom Access

- Number of delayed escorts
- Number of classes canceled
- Number of movement restrictions

5. Academic Intervention and Special Education

1. Remedial Instruction

- Number of youth receiving tutoring outside school hours
- Intervention hours per youth per week
- Standards mastered after intervention

2. Credit Recovery

- Number of youth enrolled in credit recovery
- Number of credits earned during the quarter
- Number of youth on track for graduation

3. Special Education Compliance

- Implementation of IEP goals
- Delivery of related services
- Missed services and compensatory actions

6. Transition, Reentry, and Post Release Outcomes**1. Transition Planning**

- Number of youth with completed reentry plans
- Number of youth receiving transition counseling
- Number of credits transferred to home districts

2. Cross Agency Case Management

- Number of youth receiving coordinated case management
- Documentation of communication between education, probation, mental health, and community organizations

3. Post Release School Enrollment

- Number of youth reenrolled in district schools within ten days
- Enrollment barriers encountered
- Attendance rates for reenrolled youth

4. Postsecondary and Workforce Readiness

- Number of youth connected to community college
- Number of youth completing FAFSA or California Dream Act
- Number of youth engaged in workforce programs

7. School to Prison Nexus Indicators

1. Prior Educational History

- Percentage of youth with histories of suspension
- Percentage with histories of expulsion
- Percentage with chronic absenteeism
- Percentage with incomplete special education evaluations

2. Facility Level Indicators

- Recidivism data for youth exiting each facility
- Geographic mapping of school districts sending youth to custody
- Analysis of disproportionality by race, disability, and socioeconomic status

8. Fiscal Accountability

1. Staffing Expenditures

- Salaries and benefits for each staffing category
- Use of contract employees
- Overtime costs
- Retention incentives used

2. Program Investments

- Spending on restorative practices
- Spending on tutoring and intervention
- Spending on instructional materials
- Technology expenditures

3. Contracted Partner Expenditures

- Community based organization contracts
- Credible messenger program costs
- Evaluation and data systems contracts

Summary

Appendix C provides the required quarterly oversight structure that ensures transparency, accountability, and alignment with Board mandates.

It supports continuous improvement, early detection of failures, and the use of data driven decision making across Los Angeles County juvenile facilities.

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Follow-Up: ADA Title II Record Continuity and CPRA Access Barriers – Reference E-13A (October 27 2025) Re: Public Records Act Request Dated September 30, 2025

Tamim Mohammad <tamimmohammad@gmail.com>

Mon, Nov 17, 2025 at 9:00 AM

To: Brian Le <BLE@counsel.lacounty.gov>, dharrison@counsel.lacounty.gov, jwhitehurst@counsel.lacounty.gov, Miguel Chavez <MChavez@counsel.lacounty.gov>, Emily Issa <Elssa@counsel.lacounty.gov>, rclaro@counsel.lacounty.gov, akatz@counsel.lacounty.gov, COCO_Contact_Us <Contact_Us@counsel.lacounty.gov>, egomez@counsel.lacounty.gov, dmhcpra@dmh.lacounty.gov, CKanashiro@counsel.lacounty.gov, Justin Kim <JYKIM@counsel.lacounty.gov>, BKishimoto@counsel.lacounty.gov
Cc: DHCS Civil Rights <civilrights@dhcs.ca.gov>, mhsoac@mhsoac.ca.gov, pracoordinator@auditor.ca.gov, mhsa@dhcs.ca.gov

Re: ADA Title II Record Continuity and CPRA Access Barriers – Reference E-13A (October 27 2025)

Dear Mr. Le,

Cc: County Counsel, Ms. Harrison, Ms. Whitehurst, Mr. Kim, Ms. Issa, Mr. Kishimoto, Ms. Victoria, Ms. Katz, Mr. Gomez, Mr. Chavez et al., DMH CPRA Unit, DHCS OCR, MHSOAC, Executive Office

I write to follow up on my October 27 correspondence titled *“Notice of Procedural Continuity and ADA / § 504 Access Obligations – CPRA Requests (September 8 and October 1 2025)”* (Exhibit E-13A), transmitted to County Counsel and copied to relevant oversight agencies.

For continuity, please note that this notice also encompasses prior correspondence issued by County Counsel staff on October 10, 2025 (Baron Kishimoto / Justin Kim), which provided a 14-day extension under Gov. Code § 7922.535(b) regarding the same CPRA request dated September 30, 2025. As outlined in Exhibit E-13A, that partial communication and the subsequent October 27 letter are hereby consolidated under a single procedural record for ADA Title II compliance and evidentiary attribution within the **Unified BCCP™ / B2C3A™ Framework**.

As of today, I have not received confirmation that the County has acknowledged or entered that notice into its internal CPRA or ADA compliance record.

More immediately, I continue to experience barriers to effective access, including:

1. Inaccessible OneDrive portal links issued in your October 27 response letter (QPC / Auditor-Controller request). **The County login page blocks sign-in following administrative credential deactivation on April 10 2025.**
2. Fragmented communication channels across departments and contractors, resulting in incomplete delivery of responsive materials and duplication of “final” closure notices inconsistent with Title II effective-communication requirements.
3. Absence of an identified ADA liaison or designated staff contact to coordinate accessible record delivery and confirm continuity of pending CPRA requests.

For context, these continuity and access concerns are consistent with record-integrity issues previously documented in my July 1, 2025 correspondence to the Prevention and Promotion Systems Governing Committee (“PPSGC Public Record Response – Confirmation & Ethical Clarification Request”). That filing detailed omissions of publicly submitted frameworks from PPSGC meeting minutes and the subsequent release of materials replicating those frameworks without attribution. This history underscores the need for transparent docket management and ADA-compliant coordination to maintain a complete and accurate administrative record.

For additional context, I also note the convergence between the County's recent Board motions of November 4 2025—particularly "Access to Learning: Fighting for the Rights of Incarcerated Youth" and "Post-Secondary Education Services in Los Angeles County Probation Detention Facilities"—and the prevention and custody-pipeline constructs first introduced under ADA protection through the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Pipeline Prevention Model. Those motions employ the same analytic framing of the *school-to-prison nexus* that originated in my ADA-protected frameworks and have since been incorporated into County prevention governance materials.

For provenance continuity and ethical compliance under U.S. Copyright TXu 2-486-534 and ADA Title II obligations, I respectfully request that the County record reflect authorship linkage to the ADA-protected BCCP™ and B2C3A™ frameworks in any future policies, communications, or consultant materials that draw upon these constructs. To support this request, I have attached as Exhibit R-14 the November 4, 2025 Board motion package ("Access to Learning: Fighting for the Rights of Incarcerated Youth" and "Post-Secondary Education Services in Probation Detention Facilities"), which documents policy convergence with the prevention and custody-pipeline models previously entered into the ADA record. This exhibit is submitted solely for evidentiary preservation under ADA Title II and FEHA § 504. A corresponding Legal and Evidentiary Brief (R-14A) analyzing authorship and framework alignment will be filed following confirmation of docket entry.

For procedural clarity, please review Exhibit E-13A and confirm in writing:

1. The October 27 correspondence has been entered into the County's official CPRA and ADA record.
2. The County will provide ADA-compliant access to the referenced QPC/A-C materials via an alternative method (e.g., email transfer or an accessible download link).
3. County Counsel will identify the staff member responsible for ADA/Section 504 coordination in ongoing records-access matters.

This request is made under Title II of the Americans with Disabilities Act (28 C.F.R. § 35.160), which requires that communications with individuals with disabilities be as effective as communications with others, and under California Government Code §§ 7922.530–7922.545, which govern public-records access by state and local agencies. The purpose is solely to maintain lawful procedural continuity and prevent further fragmentation of the administrative record.

Attachments: Exhibit E-13A (October 27 2025); Exhibit R-14 (Board Motions, Nov 4 2025)

Respectfully,

Dr. Esroruleh T. Mohammad, Ph.D.

Clinical Psychologist (on ADA / § 504 Medical Leave)

Systems Equity Strategist & Family Advocate

Author, BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) / B2C3A™ Frameworks | U.S. Copyright TXu 2-486-534

tamimmohammad@gmail.com

Filed under: Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive

Submitted in accordance with confirmed ADA Title II / § 504 written-communication accommodation (CRD approval 10 / 23 / 25).

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This correspondence forms part of the **Unified BCCP™ / B2C3A™ Evidentiary Convergence Archive**, filed under **ADA Title II, FEHA § 12940, and U.S. Copyright TXu 2-486-534** protections. Portions of this material constitute protected intellectual property and ADA compliance records subject to federal and state confidentiality provisions.

On Mon, Oct 27, 2025 at 4:48 PM Brian Le <BLe@counsel.lacounty.gov> wrote:

Sent on Behalf of Justin Kim, Deputy County Counsel:

Good afternoon,

Attached please find our correspondence in regards to your Public Records Act Request Dated September 30, 2025.

Thank you,

Brian Le

LEGAL OFFICE SUPPORT ASSISTANT II

GOVERNMENT DIVISION

Office of the County Counsel

County of Los Angeles

213.584.1561



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2 attachments

 **E-13A_2025-10-27_CountyCounsel_ProceduralContinuityNotice_ADA-504_Access_and_Unified_BCCP-B2C3A_Framework.pdf**
381K

 **Exhibit R-14 – Convergence Excerpt (“School-to-Prison Nexus” Motion – Nov 4 2025).pdf**
194K

**MOTION BY SUPERVISORS HOLLY J. MITCHELL
AND JANICE HAHN**

November 4, 2025

Access to Learning: Fighting for the Rights of Incarcerated Youth

All Youth in California, including those who are incarcerated, have a fundamental right to education. The Education Justice Coalition (EJC) reviewed suspension rates for the 2023-2024 school year and found that, “one in three young people incarcerated in Los Padrinos graduated from high school while nearly one in four were suspended.”¹ The Los Angeles County Office of Education (LACOE) reports that 25.7% of students at Barry J. Nidorf Juvenile Court School and 29.2% of students at Dorothy Kirby Center were suspended at least once - far exceeding the statewide average. The unique setting of these schools can further exacerbate the impact of suspension.

Suspensions have grave long-term effects on student outcomes and can significantly alter the trajectory of a young person’s life. When students are suspended, they lose invaluable instructional time, which negatively affects academic performance over time. ² A 2018-2019 Youth Law Center report states, “It is likely that even before entering the juvenile justice system, court school students experienced prior suspension

¹ [Who has the power? Chronicling Los Angeles County’s systemic failures to educate incarcerated youth](#)

² <https://www.nea.org/nea-today/all-news-articles/school-suspensions-do-more-harm-good>

-MORE-

MOTION

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or expulsions, school attendance issues...”³ Even in non-carceral settings, suspensions have been linked to an “increased likelihood of subsequent arrest as well as failure to advance academically to the next grade, or to graduate.”⁴ Furthermore, suspension rates reported by EJC raise concerns about the disproportionate impact on Black students. Suspensions in juvenile halls and camps should be avoided as much as possible to ensure students do not miss valuable learning time. The suspension process must be transparent and clearly communicated to youth, as it can affect their legal case.

Following the court’s mandate to depopulate Los Padrinos Juvenile Hall, student transitions have led to a significant increase in suspension rates over the past six months. LACOE has begun addressing this increase by identifying contributing factors, expanding behavioral supports such as Positive Behavioral Interventions and Support, and improving training for teachers and substitutes. Still, the County of Los Angeles has ongoing work to do to address the increase of suspensions in probation facilities, which serve youth who have long faced systemic disparities. Students should also have agency in shaping solutions that foster a positive educational environment. There should be clear avenues for students to provide feedback and provide support to implement programming and school climate changes. Data presented by the Youth Law Center suggest that achieving zero suspensions and expulsions is possible, offering an opportunity to examine the practices that contributed to those outcomes.

WE THEREFORE MOVE THAT THE BOARD OF SUPERVISORS:

1. Request the Superintendent of the Los Angeles County Office of Education (LACOE) in coordination with the Probation Oversight Commission (POC) and a credible academic research institution, to review and analyze suspension rates, including chronic absenteeism in the juvenile camps and halls from the 2023-2024 school year and prior years, dating back to 2014-2015, to identify trends and disparities across the juvenile facilities and report back to the Board in writing, in

³<https://www.ylc.org/wp-content/uploads/2023/11/Out-of-Sight-Out-of-Mind-Report-Nov-2023.pdf>

⁴ <https://nij.ojp.gov/topics/articles/student-suspensions-have-negative-consequences-according-nyc-study>

60 days, with findings. The analysis should include but not be limited to:

- a. Reasons for suspensions, duration of suspensions, and instructional time lost, including, but not limited to, challenges related to escorting youth to classes.
 - b. Data for suspensions initiated by probation personnel paired with justifications.
 - c. Data for suspensions initiated by substitute teachers with justifications.
 - d. Demographic disparities present in suspension data.
2. Request the Superintendent of LACOE in coordination with the Director of the Department of Youth Development (DYD), the POC, community stakeholders, youth in Los Angeles County (County), and youth-led and centered organizations, to take steps to minimize the negative effects of exclusionary disciplinary policies and continue to prioritize positive behavior interventions and supports. The steps should include the following actions:
 - a. Review the existing criteria for *Student Suspension Process at Juvenile Halls and Camps*, that is accessible to the students, to ensure they have clarity of expectations to prevent the use of zero-tolerance policies.
 - b. Implement strategies to identify and remediate learning gaps caused by disciplinary removal from class or unintended consequences from student transitions.
 - c. Develop a plan for implementation of restorative justice models, with input from external stakeholders, in the juvenile camps and halls.
3. Request the Superintendent of LACOE in coordination with the Chief Probation Officer to review and implement the Education Justice Coalition's August 2025 report, including its 18 recommendations to improve educational access in the juvenile detention facilities. This should include a joint plan to ensure that student support services for academic intervention and college/career preparations are provided, and that critical special education supports for students with disabilities

are provided. A written report back on the status of all remediation efforts and action steps in response to each recommendation should be submitted to the Board in 60 days.

4. Direct the Chief Probation Officer and Director of DYD, to coordinate with the Superintendent of LACOE to establish a youth led council at each facility to inform programming and provide ongoing feedback. The Council should meet regularly and include a youth advocate and credible messenger. Recommendations should be shared with the POC, which will meet consistently with LACOE and Probation to review and provide feedback.
5. Request the Superintendent of LACOE, and the Director of DYD, in consultation with the Chief Probation Officer, POC, the Commission for Children and Families, the Directors of the Department of Mental Health, the Anti-Racism, Diversity, and Inclusion Initiative, and all relevant County departments, and education stakeholders within the County to report back to the Board in writing in 120 days, with a comprehensive assessment of the current landscape of the “school-to-prison” nexus and recommendations on interrupting this system. The report should include, but not be limited to:
 - a. An assessment of youth in the facilities who have histories of suspensions, expulsions, and/or chronic absenteeism prior to arrest.
 - b. Identification of regions and schools that have a high representation of youth in Probation, along with potential resource gaps.

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MOTION BY SUPERVISOR JANICE HAHN

AGN. NO. _____
November 4, 2025

Post-Secondary Education Services in Los Angeles County Probation Detention Facilities Click or tap here to enter text.

Education is a tool that has the power to change lives, and having access to high quality, consistent education is shown to be particularly impactful for those who are incarcerated. In 2021, the Brookings Institution reported that, “individuals who enroll in postsecondary education programs are 49% less likely to be reincarcerated than those who do not and the odds of being employed post release are 12% higher for individuals who participate in any type of correctional education.”¹ The Los Angeles County Probation Department has a duty to provide the young people who are detained in their facilities with opportunities to participate and thrive at all points of their educational journeys, whether they are in grade school, high school, or pursuing a post-secondary education.

Under Probation’s current structure, the Los Angeles County Office of Education (LACOE) provides educational services for incarcerated youth up to grade 12, and Probation oversees the provision of educational services for incarcerated youth who are high school graduates through their Probation Education Services unit. This structure is unique, as most other counties in California have their education departments leading

¹ Gibbons, Alexandra and Rashawn Ray. [“The societal benefits of postsecondary prison education.”](#) Brookings. August 20, 2021

MOTION

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The Education Justice Coalition (EJC) would like to thank Supervisors Mitchell and Hahn for co-authoring the motion entitled “Access to Learning: Fighting for the Rights of Incarcerated Youth” and express our support for this motion. EJC is an organizational partnership amongst ACLU of Southern California, Arts for Healing and Justice Network, Children’s Defense Fund-California, Disability Rights California, Public Counsel, and the Youth Justice Education Clinic at Loyola Law School. We aim to uplift young people’s lived experiences, provide education advocacy resources in the community, end the school-prison nexus, and hold decision-makers accountable.

In August 2025, EJC released a report documenting Los Angeles County’s systemic failures to address the needs of incarcerated students. In this report, we raised two critical questions: “Who has the power to make the necessary reform to ensure equitable education for detained young people in Los Angeles County? And, will those with power heed the call for increasing public accountability and community partnership to achieve this end moving forward?”

To address concerns with education and programming inside LA County Juvenile Halls and Camps, this motion seeks to implement several EJC report recommendations. We applaud this effort to address school suspensions and chronic absenteeism, lack of access to quality education (including special education) and programming, and the historic lack of accountability and transparency in the provision of education services in the facilities. We especially appreciate the emphasis on interrupting the school-prison nexus in LA County by asking our relevant county stakeholders to investigate and assess the way LA’s youth are being funneled into the juvenile criminal legal system by local education agencies.

With that said, EJC would like to note areas where we believe the motion could be improved and respectfully request that these items be revised. First, we do not believe that Opportunity Rooms are a solution to school suspensions or chronic absenteeism. In fact, in our experience as education advocates and attorneys, so-called “Opportunity Rooms” often serve as tools for ongoing school pushout and exclusion. Rather than determining suitable locations for Opportunity Rooms in LA County juvenile court schools, EJC would urge the Los Angeles County Office of Education (LACOE) to work with other stakeholders to address school suspensions in LA County juvenile court schools by implementing the critical steps outlined in this motion.

Next, EJC is concerned that the motion, as written, does not appear to address special education instruction and related services for students with disabilities. Although this motion references “special education accommodations,” some students with disabilities require more than accommodations to access and benefit from their education. For example, a student with a learning disability and language impairment will require more than an accommodation for extra time on assignments to receive meaningful benefit from their education. Federal and state law is clear that such students are entitled to specially designed instruction to meet their unique needs, as well as related services such as speech and language therapy. EJC urges consideration of agencies’ legal obligations to students with disabilities under Section 504 *and* the Individuals with Disabilities Education Act (IDEA).

Finally, EJC requests that LACOE and Probation be directed to report back to the Board of Supervisors on existing efforts to implement the EJC report recommendations *and* their plan to implement any recommendations or components of them that have yet to be implemented. This report back should be accomplished in 60 days rather than 90 given the urgent need to address the longstanding systemic concerns identified in the EJC report and this motion.

Thank you again to Supervisors Mitchell and Hahn for authoring this motion, and we respectfully encourage all of our honorable supervisors to vote to approve the motion with EJC's suggested changes.