

Orange County Equality Coalition School Compliance Task Force
Sub Committee for Reforming the California Dept. of Education Equal
Opportunity Office

Respectfully Submitted by:
Karyl E. Ketchum, Ph.D.
Thomas J. Peterson, M.B.A.
Gialisa Gaffaney, J.D.

5405 Alton Pkwy., Suite A-250
Irvine CA 92604
ocequality@gmail.com

Specific Demands made to CDE EO for Reform:

1. CDE EO has 30 days to submit their report on progress and policy changes per the Auditor's mandate or CDE must hire an outside agency to come in and implement computer logging and tracking systems, data entry on Appeals for the last 5 years and initiate appropriate policies and procedures so that CDE EO may meet their obligations to protect California's K-12 students per state and federal law. The Orange County Equality Coalition School Compliance Task Force Sub Committee for Reforming the California Dept. of Education Equal Opportunity Office will oversee this process and certify its completion.

2. Within one year CDE EO should implement an online computerized tracking and logging system that also allows complainants and related parties to file and track appeals. This system should include retroactive data for 5 years minimum and may use an internal coding system for specific identifying information in compliance with FERPA laws.

3. A formalized and standardized investigation process be immediately mandated for each appeal in-process at CDE EO and for all future appeals. Given the importance of a swift response in cases of discrimination, bullying and harassment, and the possibility that students filing appeals in cases of discrimination, bullying and harassment may also experience additional retaliation, investigations of all appeals must be completed within 6 months of receipt by CDE EO. Investigations must include site visit(s) and in-person interviews with complainants and school representatives. This process and resolution must be based on the principles of restorative justice and give CDE EO the power to mandate additional education for school employees as one method of restorative justice. A list of approved classes relating to protected categories of discrimination and other safe school best practices (such as FAIR Ed) will be immediately developed and approved in consultation with OCEC.

4. An annual comparative data analysis process be instated at CDE EO that compares complaints of discrimination/harassment/bullying at the school and district levels to other measures of school climate health (like the state School Climate Survey). This process should culminate in an annual report of potential problem schools and districts in the state and an action plan detailing methods whereby CDE EO will actively work to address these problems before the next year's annual report

- in one calendar year. This report must be publicly available and may use an internal coding system for specific identifying information in compliance with FERPA laws. The first of these annual reports must be filed by January 1, 2016.

5. In recognition of the well-documented and devastating emotional, intellectual and pedagogical effects of harassment, bullying and discrimination on youth in K-12 schools, CDE must immediately create a separate office designated to respond only to complaints of student harassment, bullying and discrimination. (Currently CDE EO also must investigate faculty/staff complaints.)