



August 11, 2023

Honorable Judge Michael D. Coughlan
Presiding Judge of the San Joaquin County Superior Court
180 E. Weber Avenue, Suite 1306J
Stockton, CA 95202

RE: Grand Jury Report: “School Safety in San Joaquin County: Developing a Culture of Safety”: Case No. 0322

Dear Judge Coughlan:

The Banta Unified School District (“District”) has reviewed the Facts, Findings, and Recommendations in the Grand Jury Report “*School Safety: A Shared Responsibility*” filed on June 13, 2023. Pursuant to California Penal Code section 933(c), the following constitutes the response of the District and its Governing Board (“Board”) to the findings and recommendations pertaining to matters under the control of the District.

RESPONSE TO FINDINGS 2.0: COMPREHENSIVE SCHOOL SAFETY PLAN

F2.1. A review of CSSPs demonstrated many Districts have failed to create a CSSP that addresses safety issues unique to the individual school sites, and rather use a template and/or boilerplate language, leaving the school site unprepared in an emergency.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that a template was used to create the original CSSP document. The District does not know the practices of other districts and only has knowledge of our practices in the development of our CSSPs. The District disagrees with the finding that boilerplate language is used throughout the document, as much work has been done to make the document unique to our District. For instance, as the school is located less than one thousand (1,000) feet from the railroad tracks, information regarding chemical spills, train derailment, and evacuation has been included in the document. The District disagrees that it is unprepared for an emergency, as staff is trained yearly on safety protocols, students and staff participate in monthly drills, and safety professionals are consulted multiple times a year in regard to teacher and staff responses and training. The District works with multiple city and county agencies to ensure the safety of our students.

F2.2. Many Districts have not involved teachers, support staff, students, and parents/guardians when updating each school site's CSSP, missing an opportunity to create a culture of school safety.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that parents were not consulted in the creation of the original CSSP document. The District does not know the practices of other districts and only has knowledge of our practices in the development of our CSSPs. The District agrees that the involvement of staff, teachers, and students in the development of the CSSPs was a valuable tool to help the District create the best possible safety plan that it could and has used each of these subgroups in the development of the CSSPs. The District has not used a parent subgroup specifically for the development of the CSSPs, although the parent club was consulted for areas of safety concern that they identified within the District.

F2.3. Many Districts have not collaborated with local law enforcement and other first responders during the annual process to update the CSSP, which could result in a prolonged and inefficient emergency response.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees partially with the finding regarding collaboration with local law enforcement. The District does not know the practices of other districts and only has knowledge of our practices in the development of our CSSPs. Although in previous years, representatives from the Sheriff's Office were available to meet with the District and review the yearly updated CSSP, the District has been unsuccessful this year in reaching anyone in the Sheriff's Office to work with. The availability of a school resource officer is not something that is offered to rural schools through the Sheriff's Office. The District has made numerous phone calls, has sent many emails to various contacts, and has even given a copy of the CSSP to a deputy who was responding to a separate matter. As of this date, we cannot get the Sheriff's Office to respond to our request for safety collaboration.

F2.4. Many District CSSPs show a lack of meaningful collaboration between Districts and local law enforcement agencies, causing confusion and chaos during an emergency.

Response: The District partially disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that there is a lack of meaningful collaboration between our District and the local Sheriff's Office. Although the District disagrees that this will cause confusion and chaos during an emergency. The District does not know the practices of other districts and only has knowledge of our practices in working with local law enforcement. It should be noted that the District wants to work with local law enforcement in collaboration on the CSSPs, and has reached out to the

County Sherriff's Office multiple times but has not had a response. In regards to the finding that lack of collaboration causes confusion and chaos, the District disagrees in that staff and students have been trained on how to respond to multiple emergency situations, and protocols are in place for off-site staging, notification, and reunification. It should also be noted that although Banta is closer to the city of Tracy, and although it is the Tracy Police Department that will most likely respond first in a crisis situation, we are unable to collaborate with Tracy due to jurisdictional reasons between city and county departments/agencies. We believe that this practice should change. Response times of the Sheriff's Office to school needs are usually multiple hours.

F2.5. Many Districts do not offer an opportunity for public input during the drafting or approval stages of the annual CSSP, which renders the Districts out of compliance with State law.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(1).)

Explanation: The District provides many opportunities for parents, staff, students, and community members to provide input to the CSSP either in person or via email or phone. Opportunities include the Annual Parent/Student survey, Parent Club meetings, English Language Advisory Committee Meetings, Board meetings, staff in-service days, and monthly staff meetings. Banta is a single-campus school District making the Superintendent accessible daily to receive input and opinion through an open-door policy.

F2.6. Most Districts do not include an assessment of the status of crime at the school and school related functions in their CSSPs, which renders the Districts out of compliance with State law and causes potential harm and liability.

Response: The District agrees with this finding. (Pen. Code, § 933.05(a)(1).)

Explanation: The District agrees with the finding that an assessment of crime was not included in the annual CSSP document, in chart form and was only included in writing. The District has made changes to the CSSP document and has inserted incident reports from our CALPADS data, and these changes will go to the August board meeting for approval. The District does not know the practices of other districts and only has knowledge of our inclusion of the status of crime data in the development of our CSSPs.

F2.7. Many Districts do not adequately address the unique needs of students with disabilities during emergencies. The lack of planning for the most vulnerable students can cause harm during a time of confusion and crisis.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees with the finding that the District may not adequately address the unique needs of students with disabilities during an emergency. Although the District does annual planning for special needs students, the District has made changes to its processes and will be meeting with all special needs teachers in August to identify

specific accommodations that they may need for their students during an emergency. The District is also a host to county special education programs, and their teachers will be included in the August planning meeting. The District does not know the practices of other districts and only has knowledge of our specific planning to address the needs of students with disabilities during an emergency.

F2.8. A few Districts do not make any part of the CSSPs available to the public, withholding important information about steps taken by the District to reduce the probability and impact of safety risks. Other Districts post the CSSPs in their entirety, failing to keep confidential information about tactical responses, potentially revealing sensitive information to the public.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees that the CSSP is not posted on our websites in order to keep confidential information about tactical responses confidential. The District believes that the public has ample opportunity to give input on the CSSP in our annual public hearing. The District does not know the practices of other districts and only has knowledge of our practices in the posting of the CSSP. The District currently prints the annual CSSP for all teachers and staff members. The CSSP is reviewed by staff, both collectively and individually, annually, and new safety risks are evaluated, addressed, and added each year. The District believes that posting the CSSP online creates an unnecessary safety risk to the staff, teachers, administrators, and children of the District.

F2.9. Many Districts have CSSPs that fail to identify incident command roles and the individuals who are to perform those roles in case of an emergency, exposing students and staff to the potential for confusion and increased risks during an emergency.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees with the finding that the District failed to identify incident command roles but agrees that failure to do so would cause increased risk during an emergency. The District does not know the practices of other districts and only has knowledge of our practices in the identification of incident command roles. Incident command roles are called out in the CSSP, with contact information and roles. Incident command individuals are aware of their role during an emergency. The District appreciates that the incident command roles are extremely important, and taken the finding, will make sure to meet with the incident command individuals more than once a year.

F2.10. Many Districts have CSSPs that fail to describe the system to reunite parents/guardians with their children in the event of a campus wide evacuation, creating confusion and additional anxiety in the event of a safety emergency.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees with the finding that the District failed to describe the system to reunite parents with their children in the event of a campus-wide evacuation but agrees that failure to do so would cause confusion and anxiety during an emergency. The District does not know the practices of other districts and only has knowledge of our practices in the identification of parent/child reunification.

F2.11. Many schoolsite CSSPs do not account for specific dangers unique to the school site (e.g., train tracks, flooding, freeways).

Response: The District agrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(1).)

Explanation: The District disagrees with the finding that the District CSSP does not account for specific dangers unique to the school site but agrees that failure to do so would cause increased risk during an emergency. The District does not know the practices of other districts and only has knowledge of our practices in the identification of specific dangers unique to the school site. The District has included evacuation to adjacent fields, evacuation due to train derailment and exposure to chemical spills, as well as evacuation due to levy/river flooding in the CSSP.

RESPONSE TO RECOMMENDATIONS 2.0: COMPREHENSIVE SCHOOL SAFETY PLAN

R2.1. By March 1, 2024, the annual updates for each school site's CSSP address safety issues unique to the site.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District has always followed the recommendation that the annual safety plan is updated by March 1st of each year in accordance with California Education Code section 32286 (a). The District has made changes to the CSSP document that was approved last year and will be taking our CSSP back to the school board in August. The CSSP for the District will be modified throughout the year and brought back for Board approval in February 2024.

R2.2 By December 15, 2023, while updating the school's CSSP, each school site collaborate and receive input from representatives of teachers, support staff, students, and parents/guardians.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District will continue to solicit input from representatives of teachers, support staff, students, and parents/guardians through the annual Healthy Student survey, as well as the annual Staff/Parent/Student surveys which are distributed each March. Input is also gathered from parent club meetings, English Language Advisory Committee Meetings, weekly staff meetings for classified and certificated employees, and school safety committee meetings. Input is also given at school board meetings, as well as directly to administration from staff, parents and the public, through email and phone calls.

R2.3. By December 15, 2023, while updating the school's CSSP, each school site collaborates and receives input from the appropriate emergency response agencies.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District will continue to collaborate and receive input from the appropriate emergency response agencies each year as we edit and review the CSSP. The District would like it noted that it has reached out to the County Sheriff's Office this past year and was unable to get a response from the Sheriff's Office in regards to collaboration or approval of the CSSP. Districts may need help in creating a sense of urgency on behalf of the County Sheriff's Office in order to meet the recommendation. Coordination between different jurisdictions, i.e., Tracy PD and the Sheriff's Office, might create more avenues for collaboration for rural Districts.

R2.5. By February 1, 2024, each school site council or safety planning committee hold an advertised public meeting at the school site to allow members of the community an opportunity to express an opinion about the school's proposed CSSP as required by California Education Code Sections 32288(b)(1) and (2).

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District discusses the CSSP each year at a monthly parent club meeting, the annual LCAP meeting as well as at District safety meetings. Due to low parent turnout at these meetings, feedback is also solicited through our annual parent survey. Parents are much more motivated to discuss safety concerns in writing.

R2.6. By March 1, 2024, each school site's CSSP includes the State mandated assessment of the status of crime at the school and school-related functions.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District reviewed the currently approved CSSP and made additions to the status of crime figures by including a chart. The CSSP will be brought back to the school board in August 2023.

R2.7. By March 1, 2024, each school site consult with the appropriate professionals to address the unique needs of students with disabilities when updating the CSSP.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District will continue to consult with the appropriate professionals to address the unique needs of students with disabilities when updating the CSSP and will do so before March 1, 2024. The District is planning on meeting with all special needs educators in August to determine if there are any modifications or accommodations that their individual students or classes need this year for emergency situations.

R2.8. By March 1, 2024, each school site's CSSP be available to the public with the exception of confidential information about tactical responses.

Response: This recommendation has not been implemented, but will be implemented. (Pen. Code, § 933.05(b)(2).)

Explanation: The District will create a public version of the CSSP this year and will make it available to the public on the District website, Home - Banta Unified School District (bantasd.org). Banta's confidential CSSP will continue only to be available to staff and local law enforcement.

R2.9 By March 1, 2024, each school site's CSSP identify the incident command roles and the individuals who are to perform those roles and their alternate in cases of an emergency.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District school site CSSP identifies the incident command roles and the individuals who are to perform those roles and their alternate in cases of an emergency. The District will continue to identify incident command roles in the CSSP and will update yearly with current staff before March 1, 2024. Incident command positions are currently listed in the CSSP on page 47.

R2.10 By March 1, 2024, each school site's CSSP describe the system to reunify parents/guardians with their student in the event of a campus-wide evacuation, including how parents/guardians are informed of reunification details.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District's CSSP describes the system to reunify parents/guardians with their student in the event of a campus-wide evacuation, including how parents/guardians are informed of reunification details on page 72 of the CSSP. The District will continue to describe the system to reunify parents/guardians with their students in the event of

campus-wide evacuation roles in the CSSP and will continue to do so before March 1, 2024.

R2.11 By March 1, 2024, each school site's CSSPs account for dangers unique to the specific school site (e.g., train tracks, flooding, freeways).

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District CSSP accounts for dangers unique to the specific school site. Safety hazards such as train derailment/chemical spills, as well as flooding, and evacuation to farmer's fields are all currently listed in the CSSP. The District will continue to account for dangers unique to the specific school site in the CSSP and will continue to do so before March 1, 2024.

RESPONSE TO FINDINGS 3.0: TRAINING

F3.2 Some of the Districts failed to send representatives to the 2022 School Safety Summit, thereby missing an opportunity to work together to make schools safer.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees with the finding that the District failed to send a representative to the 2022 SJCOE Safety Summit. The District does not know the practices of other districts and only has knowledge of our practices in regard to attendance at the SJCOE Safety Summit. The District will continue to support attendance at the SJCOE School Safety Summit and will ensure that members of the District attend and bring back the information to the school site.

F3.3 The Grand Jury learned through interviews, surveys, and site tours that many Districts fail to include safety topics during regular meetings with teachers and support staff throughout the school year, minimizing the importance of safety.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District includes safety topics at various meetings throughout the school year. Classified and certificated staff meetings, in-service days, preservice days, and buyback days have all been used to discuss safety topics this past year.

F3.4 The Grand Jury learned through interviews, surveys, and site tours that many school sites fail to assure substitute staff receive the information they will need in the case of a school safety emergency, leaving the substitute staff ill-prepared for an emergency

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees with the finding that the school sites failed to ensure substitute staff receives the information they will need in the case of a school safety emergency.

The District does not know the practices of other districts and only has knowledge of our practices to ensure that substitute staff receives the information that they will need in the case of an emergency. The school district included long-term certificated, as well as classified substitutes, at the beginning of the year safety training. All substitutes have access to the color-coded safety flipbooks located in each classroom and common areas within the school, and substitute folders are used to welcome substitute staff to the site, complete with maps, safety protocols, bell schedules, and keys.

F3.5 Many Districts fail to include the utilization of communication and incident command protocols (ICS-100) during safety drills throughout the school year, causing miscommunication in an emergency.

Response: The District both agrees and disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that the district should include the utilization of communication and incident command protocols during safety drills throughout the school year. The District disagrees that it has a lack of safety protocols and believes that the protocols that are in place will prevent miscommunication during an emergency. The District does not know the practices of other districts and only has knowledge of our practices to ensure the utilization of communication and incident command protocols during safety drills throughout the school year.

F3.6 Many District cabinet-level positions (e.g., Superintendent, Chief Business Officer) are not trained in ICS protocols (ICS-402), causing a lack of unified response to Districtwide emergencies.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that the District cabinet-level positions should be trained in safety protocols and respond to a District-wide emergency with a unified response. The District disagrees that its cabinet-level positions lack safety protocols and believes that the protocols that are in place will allow for a unified response during an emergency. The District does not know the practices of other districts and only has knowledge of our practices to ensure unified communication and incident command protocols with the cabinet-level positions.

F3.7 Many school sites do not vary the time of day when routine safety drills are conducted or when students are not in classrooms, making drills predictable and leaving students unprepared for emergencies that may occur at any time.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that the school site should vary the time of day when routine safety drills are conducted. The District disagrees that its school site does not vary the time of day for scheduled drills. The District does not know the practices of other districts and only has knowledge of our practices for scheduling safety drills. The school site makes great efforts to vary the time of day of safety drills. It is important to the District that children are involved in safety drills that vary across location, time, and even place.

F3.8 Many school sites fail to include support staff (classified personnel) in probable real-life roles during safety drills, leaving them unprepared to assist students in emergencies.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that the school site support staff should participate in probable real-life roles during safety drills. The District disagrees that its school site does not include its support staff in real-life roles during safety drills. The District does not know the practices of other districts and only has knowledge of our practices for including support staff in real-life roles during safety drills. The school site ensures that all staff has a role during school safety drills.

F3.9 Most school sites fail to conduct a post-incident report after drills analyzing what went well, what went wrong, and what needs to be changed in the future to improve plans and drills, undermining the effectiveness of drills.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees with the finding that the school sites conduct a post-incident report after drills analyzing what went well, what went wrong, and what needs to be changed in the future to improve plans and drills. The District disagrees that its school site does not conduct a post-incident report after drills analyzing what went well, what went wrong, and what needs to be changed in the future to improve plans and drills. The District does not know the practices of other districts and only has knowledge of our practices for post-incident reports. Post-incident reports are held first among the site administration and then between administration and site staff after each incident.

RESPONSE TO RECOMMENDATIONS 3.0: TRAINING

R3.2 By December 1, 2023, each school District send one or more representatives to the annual School Safety Summit hosted by the San Joaquin County Office of Education.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District will continue to send one or more representatives to the annual School Safety Summit hosted by the San Joaquin County Office of Education. Last year, three of the District's administrators attended the conference.

R3.3 By September 1, 2023, safety topics be an agenda item at all school site staff meetings with teachers and support staff throughout the school year.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District will continue to have safety topics be an agenda item at all school site staff meetings with teachers and support staff throughout the school year. The District will continue to discuss safety items on a weekly basis, beginning with the August staff meetings.

R3.4 By September 1, 2023, Districts develop, adopt, and implement written procedures for school sites to provide substitute staff with the information they will need in case of a school emergency.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District has developed and implemented written procedures for the school site to provide substitute staff with the information they will need in case of a school emergency before September 1, 2023. The District will continue to utilize substitute folders to ensure that substitutes are apprised of safety procedures.

R3.5 By October 1, 2023, personnel identified in the school CSSP for incident command roles be trained and certified in ICS-100 protocols.

Response: This recommendation has not been implemented but will be implemented. (Pen. Code, § 933.05(b)(2).)

Explanation: The District's personnel identified on the CSSP's Incident Response Team will receive ICS-100 protocol training by October 1, 2023.

R3.6 By October 1, 2023, ICS-402 training be completed for all District-level executive leadership.

Response: This recommendation requires further analysis (Pen. Code, § 933.05(b)(3).)

Explanation: Banta's District-level leadership will receive ICS-402 training, but we have been unsuccessful in locating and scheduling training to be completed October 1, 2023. Banta's trainings are traditionally coordinated and scheduled through our liability insurer, but we have been informed by our insurer that Level 400 ICS trainings are not being offered anywhere right now, so the District will work on locating and securing ICS-402 training by December 13, 2023.

R3.7 By October 1, 2023, scheduled safety drills be conducted on different days throughout the school year and at various times throughout the school day, including when students are not normally in their classrooms.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District's scheduled safety drills are conducted on different days throughout the school year and at various times throughout the school day, including when students are not normally in their classrooms. The District will continue to conduct a variety of monthly drills throughout the school year, varying the time and setting of the drills. Some of the drills are known to staff, and others are implemented with no prior knowledge of the staff.

R3.8 By October 1, 2023, scheduled safety drills include support staff (classified) in probable emergency roles during the year and document their participation.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District's scheduled safety drills include support staff (classified) in probable emergency roles during the year. The District will continue to conduct a variety of monthly drills throughout the school year, in which all employees who are on-site that day will participate.

R3.9 By October 1, 2023, administrators create a post-incident report after all safety drills

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District currently meets with administration and staff in a collaborative manner, where all aspects of the drill or incident are analyzed and discussed. The time is used as an opportunity to identify areas that need to be improved, as well as create plans for future drills. Any documents resulting from these collaborative sessions are confidential.

RESPONSE TO FINDINGS 4.0: SCHOOL SITE VISITS

F4.1 Not all school sites have check-in procedures in place that were followed consistently, posing serious security threats.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees with the finding that not all school sites have check-in procedures in place that are followed consistently, posing serious security threats. The District does not know the practices of other districts and only has knowledge of its practices for check-in procedures. The District ensures all visitors are checked into the

RAPTOR system and identification is verified prior to allowing site access. All visitors are required to check in with office personnel, sign in/sign out, and a visitor badge is then printed, which they can display on their person. Only then are visitors buzzed in through a secured door. The District will ensure that all visitor badges are collected at the end of the visit upon checking/signing out.

F4.2 Perimeter fencing or an “open” campus each pose security challenges and require careful consideration to mitigate security shortcomings.

Response: The District agrees with this finding. (Pen. Code, § 933.05(a)(1).)

Explanation: The District agrees with the finding that perimeter fencing or an “open” campus each poses security challenges and requires careful consideration to mitigate security shortcomings. The district will continue to analyze the CSSP with all stakeholders to identify and mitigate security shortcomings.

F4.3 Evacuation maps that are posted inconsistently or do not adequately illustrate evacuation routes cause confusion and prolonged evacuation times, making staff and students vulnerable to harm in both classrooms and common areas.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(1).)

Explanation: The District does not know the practices of other districts and only has knowledge of its evacuation maps and routes. The District disagrees that District evacuation maps are posted inconsistently or do not adequately illustrate evacuation routes cause confusion and prolonged evacuation times, making staff and students vulnerable to harm in both classrooms and common areas. The District has specific evacuation maps and routes for every classroom and common area, which are posted at all exit doors. Evacuation maps and routes are reviewed and practiced throughout the year with all staff and students to eliminate confusion and reduce evacuation times.

F4.4 Inconsistent door-locking policies and failure to follow policies create opportunities for perpetrators to enter classrooms and common areas.

Response: The District agrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(1).)

Explanation: The District does not know the door-locking practices of other districts and only has knowledge of its door-locking policies. The District agrees that inconsistent door-locking policies and failure to follow policies create opportunities for perpetrators to enter classrooms and common areas. The District will continue to review door-locking policies and safety checks throughout the school year with all stakeholders.

F4.5 Most school sites utilized flip charts that identify steps to be taken in case of emergencies, however, none of the sites posted them in all rooms used by students, staff, parents/guardians, and the general public.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District does not know of the flip chart policies of other districts and only has knowledge of its own procedures and placements of flip charts in case of emergencies. The District disagrees that flip charts were not posted in all rooms used by students, staff, parents/guardians, and the general public. The District reviews and updates the Emergency Response Plan flip chart annually and places one in every classroom, office, and common area.

F4.6 Insufficient window coverings give perpetrators a clear line of sight, creating risk for students and staff.

Response: The District disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District agrees that insufficient window coverings give perpetrators a clear line of sight, creating risk for students and staff. The District does not know the practices of other districts and only has knowledge of its practices. The District has partnered with the Tracy Fire Department and other safety organizations to ensure window coverings meet fire codes and provide adequate cover to reduce a perpetrator's line of sight.

F4.7 Most school sites, regardless of age, were well maintained and showed school pride. One school site demonstrated multiple maintenance shortcomings, which can negatively impact safety.

Response: The District agrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(1).)

Explanation: The District agrees that it is important to maintain school grounds as a sign of school pride. The District does not know the practices of other districts and only has knowledge of its maintenance procedures. The District takes pride in sustaining a sound maintenance schedule to ensure a safe and welcoming environment for all stakeholders.

F4.8 Good relationships among administrators, certificated and classified staff, parents, and students are vital to promptly identify and address areas of concern, particularly regarding student behavior. Relationships varied greatly from campus to campus.

Response: The District agrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(1).)

Explanation: The District agrees that good relationships among administrators, certificated and classified staff, parents, and students are vital to promptly identify and address areas of concern, particularly regarding student behavior. The District does not know the practices of other districts and only has knowledge of its relationships with stakeholders. Some of the District's goals are: 1) as a school, we will foster continuous open lines of communication between students, staff, and parents; 2) Staff will encourage

a supportive relationship between the school, parents, and the community that will actively support school programs and activities; and 3) Staff will maintain a positive, safe, and clean environment that promotes learning and social growth. The District meets with staff weekly to ensure we are meeting such goals.

F4.9 The culture of safety is best developed by public transparency and involvement by all parties. Few of the school sites visited by the Grand Jury demonstrated meaningful public engagement in safety planning.

Response: The District agrees and disagrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(2).)

Explanation: The District disagrees with the finding that there is a lack of meaningful public engagement in safety planning. The District does not know the practices of other districts and only has knowledge of our practices in the development of our CSSPs. The District agrees that public engagement will improve the culture of safety, transparency, and involvement. The District has not used a parent subgroup specifically for the development of the CSSPs, although the parent club was consulted for areas of safety concern that they identified within the District. Banta Unified provides the CSSP document to the school board for annual approval and solicits comments from the public during a public hearing or during a discussion of the agenda item. The CSSP in-whole is part of the board packet and can be viewed by anyone who requests, downloads, or picks up a board packet from the District.

RESPONSE TO RECOMMENDATIONS 4.0: SCHOOL SITE VISITS

R4.1 By October 1, 2023, each school site implements an access control program that consistently includes verifying visitors' identity and collection of any issued badge before the visitor leaves the school site.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District continues to implement an access control program that consistently includes verifying visitors' identity and collection of any issued badge before the visitor leaves the school site. The District uses the RAPTOR System to verify the identification of each visitor at the school site. The District will continue to implement an access control program that consistently includes verifying visitors' identity and collection of any issued badge before the visitor leaves the school site and will continue to do so before October 1, 2024.

R4.2 By March 1, 2024, Districts develop, adopt, and implement a plan for effective perimeter control of access at all school sites.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District has implemented a plan for effective perimeter control of access to all school sites. The District will continue to ensure the perimeters of the school sites are controlled with fences, signs, lines, doors, locks, and landscaping maintenance. The District will continue to implement such perimeter controls by March 1, 2024.

R4.3 By September 1, 2023, all school sites post evacuation maps clearly showing routes from the “You Are Here” perspective be prominently posted at each entry or exit door location in both classrooms and common areas.

Response: The District agrees with this finding as it applies to the District. (Pen. Code, § 933.05(a)(1).)

Explanation: The District has evacuation maps posted in all classrooms and in all common areas.

R4.4 By March 1, 2024, Districts develop, adopt, and implement a plan for door-locking policies to secure classroom and common area doors.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District will continue to develop, adopt, and implement door-locking policies for all classrooms and common areas with staff by March 1, 2024.

R4.5 By March 1, 2024, all school sites post flip charts or similar summaries of emergency procedures be posted in all classrooms and common areas.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District continues to post flip charts of emergency procedures in all classrooms and common areas. The District will continue to review, update, and post-emergency flip charts in all classrooms and common areas each August.

R4.6 By March 1, 2024, all school sites ensure window coverings are provided for all windows, thereby not allowing a perpetrator a clear line of sight into a classroom or common area.

Response: This recommendation was implemented at all times prior to the Grand Jury Report and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The District has ensured that window coverings or window tinting is provided for all windows, thereby not allowing a perpetrator a clear line of sight into a classroom or common area. The District has partnered with the Tracy Fire Department and other safety organizations to ensure window coverings meet fire codes and provide adequate cover to reduce a perpetrator’s line of sight. The District will continue to ensure window coverings are provided for all windows by March 1, 2024.

R4.7 By October 1, 2023, the Board of Trustees, during a public meeting, review and discuss the findings and recommendations of the 2022-2023 San Joaquin County Civil Grand Jury report, Case #0322 – School Safety in San Joaquin County: Developing a Culture of Safety.

Response: This recommendation has not been implemented but will be implemented. (Pen. Code, § 933.05(b)(2).)

Explanation: The District will have the Board of Trustees, during a public meeting, review and discuss the findings and recommendations of the 2022-2023 San Joaquin County Civil Grand Jury report, Case #0322 – School Safety in San Joaquin County: Developing a Culture of Safety, before October 1, 2023.

CONCLUSION

On behalf of the Board of Trustees of the Banta Unified School District, we appreciate your concern for our District.

Sincerely,



Rechelle L. Pearlman, Ed. D.
Superintendent