



August 11, 2023

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

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

Dear Judge Coughlan:

The San Joaquin County Office of Education Superintendent of Schools (“SJCOE” or “SJCOE Superintendent”) has reviewed the Facts, Findings, and Recommendations in the Grand Jury Report “*School Safety in San Joaquin County: Developing a Culture of Safety*” filed on June 13, 2023. Pursuant to California Penal Code section 933(c), the following constitutes the response of the SJCOE Superintendent to the findings and recommendations pertaining to matters under the control of the SJCOE.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to other districts’ CSSP documents. As it pertains to the SJCOE school sites, we disagree with the finding. Although our CSSPs may use a consistent format that appears to be boilerplate, our CSSPs include an area where school sites address the safety issues unique to the site. We do not believe the use of templates leaves a school site unprepared in an emergency. Rather, we believe the use of consistent language and format can be appropriate and beneficial. For example, it helps to ensure that the various Education Code requirements are met and could ease the review process for outside agencies, such as local law enforcement. Further, language in the plans is often consistent because it is a best practice for schools to respond to like incidents in a like manner.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding the finding. As it pertains to the SJCOE's process for updating each school site's CSSP, we disagree with the finding. The SJCOE includes participation from individuals noted in the finding through regular school site council meetings.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding the finding. We disagree with the finding as it pertains to the SJCOE. The SJCOE's Emergency Preparedness Coordinator communicates regularly throughout the year with first responder agencies, such as law enforcement and fire as well as the San Joaquin County Office of Emergency Services regarding the SJCOE's sites and plans, such as the Emergency Operations Plan. Additionally, law enforcement and first responder agencies are invited to school site council meetings when the CSSP is on the agenda and we send a copy of the CSSPs for review.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. We disagree with the finding as it pertains to the SJCOE. The SJCOE's Emergency Preparedness Coordinator communicates regularly throughout the year with first responder agencies, including law enforcement, regarding the SJCOE's sites and plans, such as the Emergency Operations Plan. Additionally, law enforcement agencies are invited to school site council meetings when the CSSP is on the agenda and are provided a copy of the CSSPs for review. Further, the SJCOE is unaware of any specific incidents impacting its sites when there was chaos and confusion caused by a lack of collaboration between the SJCOE and local law enforcement agencies.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(1).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. We disagree with the finding as it pertains to the SJCOE because we provide an opportunity for public input through regular school site council meetings. The time and agenda for the meetings are made available to the public as required by law.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding the finding. The SJCOE disagrees with the finding as it pertains to the CSSPs for SJCOE school sites because we include the assessment of the status of crime in our CSSPs in accordance with Education Code requirements as it applies to the program operated at the school site.

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

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As it pertains to the SJCOE, we partially disagree with the finding because while the unique needs of students with disabilities may not be addressed in every CSSP, the SJCOE ensures their safety in other ways. For instance, at our specialized school sites where every student has a disability, planning for the safety of students is done on an individual basis.

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

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As it pertains to the SJCOE, we partially disagree with the finding because the public has the opportunity to review the SJCOE CSSP at the school site council meetings. Additionally, the SJCOE makes CSSPs available for review by the public upon request; however, we could do more to make this known. SJCOE does not share tactical response information that is in its CSSPs.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding the finding. As the finding pertains to the SJCOE, we disagree because we assign incident command roles as applicable to the site and identify them in the CSSPs.

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

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As it pertains to the SJCOE, we agree with the finding that the CSSPs for SJCOE school sites do not describe the system to reunite parents/guardians with their children in the event of a campus-wide evacuation. The SJCOE has reunification plans as part of its Emergency Operations Plan and a mass notification system (Edulinks) that would be used to communicate during events that impact a campus. However, we agree that including the information in the CSSP could be beneficial, even though it is not required by law. We do not agree that the absence of this information in the CSSP has created confusion and anxiety during safety emergencies.

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

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

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As the finding pertains to the SJCOE, we agree with the finding. This information is not always in the CSSPs; however, we think it is important to note that SJCOE addresses unique dangers to school sites in other ways. For instance, the SJCOE conducts site safety assessments at each site bi-annually. Findings are recorded and discussed with program and

site administrators and are addressed as needed. Sometimes specific plans are created as part of the Emergency Operations Plan that may impact a site, such as a flood plan. More detail pertaining to specific threats are included in flipcharts at school sites and the SJCOE Emergency Operations Plan.

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 SJCOE will continue to address safety issues unique to the site in the update of its CSSPs.

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 SJCOE will continue to include participation from representatives of teachers, support staff, students, and parents/guardians through regular school site council meetings.

R2.3. By December 15, 2023, while updating the school's CSSP, each school site collaborate and receive 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 SJCOE will continue to communicate with first responder agencies regarding SJCOE's emergency response plans.

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 SJCOE will continue to hold schools site council meetings as required by law where it will allow members of the community an opportunity to express an opinion on matters including the school's proposed CSSP.

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 SJCOE will continue to include the assessment of the status of crime in its CSSPs in accordance with Education Code requirements at sites where this is applicable.

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 SJCOE operates specialized school sites with on-site professionals who have expertise in working with students with special needs. We will continue to consult them on how to best ensure student safety, including when we update the CSSPs.

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 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 SJCOE will continue to make CSSPs, with the exception of confidential information about tactical responses, available for review by the public at a school site council meeting and upon request.

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 SJCOE will continue to assign incident command roles as applicable to the site and continue to identify them in the CSSPs.

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

Explanation: This recommendation will be implemented by the recommended timeframe. The SJCOE will continue to use its existing mass notification system (Edulinks) to notify people in the event of an incident impacting a school campus.

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 will not be implemented because it is not warranted or is not reasonable (with explanation). (Pen. Code, § 933.05(b)(4).)

Explanation: The SJCOE conducts site safety assessments at each site bi-annually. Findings are recorded and discussed with program and site administrators and are addressed as needed. If there are other plans to manage specific dangers, we will incorporate them into the CSSPs by reference.

RESPONSE TO FINDINGS 3.0: TRAINING

F3.1 Feedback forms completed by attendees of the San Joaquin County Office of Education School Safety Summit and reviewed by the Grand Jury demonstrate the value and necessity of a Countywide School Safety Summit.

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

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 SJCOE agrees with this finding. (Pen. Code, § 933.05(a)(1).)

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 SJCOE agrees with this finding. (Pen. Code, § 933.05(a)(1).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As it pertains to the SJCOE, we agree that we do not require sites to have safety topics at regular staff meetings. We discuss safety topics with staff at various times of the year, such as at professional development days before school begins and at quarterly safety meetings. We do not believe that failing to include safety topics at regular meetings minimizes the importance of safety.

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

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. The SJCOE agrees that it could do more to ensure substitutes are aware of safety protocols at its sites. However, we do not agree that the absence of a specific practice to assure substitute staff receive school safety emergency information necessarily means that substitute staff do not receive information or that they were ill-prepared for an emergency.

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

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. We agree that the SJCOE does not execute incident command protocols during safety drills because we do not believe it is appropriate to do so. Drills typically last only a few moments and are designed for practicing immediate responses to incidents. We believe practicing incident command systems and protocols is appropriate for more prolonged events or exercises. Additionally, we do not believe that the process we use has caused miscommunication in an emergency at the SJCOE.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. We disagree with the finding as it pertains to the SJCOE because SJCOE's emergency preparedness coordinator is trained to provide ICS-402 training and prior to the Grand Jury Report all cabinet members were trained in ICS-402.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As it pertains to the SJCOE, we disagree with the finding because the SJCOE conducts drills at random times throughout the day.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As it pertains to the SJCOE, we disagree with the finding because the SJCOE conducts drills at random times throughout the day and includes all school staff. Those staff members assigned a specific role in an emergency practice those roles during drills.

F.3.9 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 SJCOE partially disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. As it pertains to the SJCOE we agree that the SJCOE does not always implement post-incident reporting after drills. Although we believe conducting a post-incident report after drills is a good practice, we currently have no data to suggest that the effectiveness of drills was greatly undermined at those sites that had not previously been conducting post-incident reporting for drills. The SJCOE always conducts post-incident reporting for real-world incidents.

RESPONSE TO RECOMMENDATIONS 3.0: TRAINING

R3.1 By December 1, 2023, the San Joaquin County Office of Education and the San Joaquin County Office of Education Board of Trustees develop, adopt, and host an annual School Safety Summit.

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 SJCOE is committed to continue hosting an annual school safety summit for districts and schools countywide and will implement the recommendation by the recommended timeframe.

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: As the agency responsible for hosting the event, the SJCOE will continue to have many representatives present at the School Safety Summit.

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 will not be implemented because it is not warranted or is not reasonable (with explanation). (Pen. Code, § 933.05(b)(4).)

Explanation: Including a discussion about safety at every meeting of staff is both unreasonable and unrealistic. The SJCOE will continue to include safety topics at meetings with staff periodically throughout the year.

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 requires further analysis. (Pen. Code, § 933.05(b)(3).)

Explanation: The SJCOE will implement the recommendation by December 31, 2023. Due to the complexity and varied nature and locations of our programs, we cannot implement the recommendation by September 1, 2023.

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 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 SJCOE will continue to ensure that individuals who have been assigned incident command roles are trained and certified in ICS-100.

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

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: Cabinet members at the SJCOE have been trained in ICS-402. The SJCOE will continue this practice.

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 SJCOE will continue to conduct all drills that include all staff at various times throughout the day.

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 SJCOE will continue to conduct drills and require those staff members assigned a specific role in an emergency to practice those roles during drills.

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

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

Explanation: The SJCOE will implement post-incident report procedures for drills by the recommended date at those sites that do not already have procedures in place.

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The SJCOE cannot speak to the practices of other districts regarding this finding. We disagree with the finding as it pertains to the SJCOE. Due to the specialized nature of the school sites under the SJCOE, each site has established check-in procedures that are tailored to suit the needs of the site.

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

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

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 SJCOE disagrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(2).)

Explanation: The availability of evacuation maps is one tool for emergency preparedness, which is why SJCOE uses them and is working to update its maps. Specifically, SJCOE is performing site safety assessments during the summer and fall and will be updating existing evacuation maps and reevaluating their placement. We do not agree that the availability of a map necessarily results in shorter evacuation times or lack of confusion during evacuations. Rather, we believe that practicing evacuations in drills is a more effective tool in emergency preparedness.

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

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

Explanation: The SJCOE agrees that door-locking policies are important and should consider the unique layout of campuses. The SJCOE school sites have access control on exterior doors. Due to the specialized nature of SJCOE sites, door-locking policies for interior doors will vary from site-to-site.

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 SJCOE agrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(1).)

Explanation: Updated flip charts are being delivered to SJCOE sites during the site safety assessments taking place throughout the summer and fall. We agree that the flipcharts are not in all rooms used by students, staff, parents/guardians, and the general public. Placement of flip charts will vary by site.

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

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

Explanation: The SJCOE agrees that window coverings could be useful for obstructing the view of perpetrators.

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 SJCOE agrees with this finding as it applies to the SJCOE. (Pen. Code, § 933.05(a)(1).)

Explanation: The SJCOE cannot speak to school site maintenance as it pertains to other districts. The SJCOE sites are maintained thoroughly and regularly.

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 SJCOE agrees with this finding. (Pen. Code, § 933.05(a)(1).)

Explanation: The SJCOE cannot speak to the nature of relationships as it pertains to other districts. The SJCOE prioritizes good relationships amongst all staff parents and students. The SJCOE makes efforts to foster those relationships regularly across all programs and sites.

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

Explanation: The SJCOE agrees that the culture of safety is best developed by public transparency and involvement by all parties, but disagrees with the implication that the SJCOE does not demonstrate meaningful public engagement in safety planning. The SJCOE involves the public in planning through open school site council meetings.

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 will not be implemented because it is not warranted or is not reasonable (with explanation). (Pen. Code, § 933.05(b)(4).)

Explanation: The SJCOE school sites are equipped with access control. SJCOE will continue to follow its existing visitor management process which varies from site-to-site.

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 has been implemented at all times prior to the Grand Jury Report in classrooms and will continue to be implemented in the future. (Pen. Code, § 933.05(b)(1).)

Explanation: The SJCOE school sites have perimeter control through access control on exterior doors, perimeter fencing, or both.

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

Explanation: The SJCOE will implement the recommendation by the recommended timeframe. Site safety assessments for SJCOE sites are underway throughout summer and fall. As part of the assessments, evacuation map placement and completeness will be evaluated and addressed/updated as needed.

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: SJCOE school sites have access control on exterior doors. Due to the specialized nature of SJCOE sites, door locking policies for interior doors will vary from site to site. Door locking policies will be reviewed with site staff prior to the start of the 2023-24 school year.

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

Explanation: Updated flip charts are being delivered to SJCOE sites during the site safety assessments taking place throughout the summer and fall. This will be completed by the recommended deadline. Placement of flip charts will vary by site.

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 will not be implemented because it is not warranted or is not reasonable (with explanation). (Pen. Code, § 933.05(b)(4).)

Explanation: The SJCOE agrees with the premise of the recommendation and is committed to ensuring that window coverings are provided to ensure student safety. However, we cannot commit to providing covers for all windows because we must also consider other student safety hazards that may be caused by obstructed views.

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 will not be implemented because it is not warranted or is not reasonable (with explanation). (Pen. Code, § 933.05(b)(4).)

Explanation: We believe this recommendation should not have applied to SJCOE because the San Joaquin County Superintendent of Schools was served in this case as an elected official. In contrast to school district superintendents, who are employed by the Governing Board of the school district, the County Superintendent of Schools is not an employee of the County Board of Education. These two entities are separate legal entities. The San Joaquin County Board of Education is not a party to the Grand Jury report.

CONCLUSION

On behalf of the SJCOE, we appreciate your concern for our students.

Sincerely,

A handwritten signature in blue ink that reads "Troy Brown". The signature is fluid and cursive, with a long horizontal stroke at the end.

Troy A. Brown, Ed.D.
County Superintendent of Schools
San Joaquin County Office of Education

c: Irving Jimenez, Staff Secretary to the Grand Jury