SYMPOSIUM ESSAY

Race, School Policing, and Public Health

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Abstract. The ever-growing list of names of Black victims who have died at the hands of police has emboldened a new public narrative that frames police violence—and other more commonplace, though less lethal, disparate policing practices—as a public health crisis rooted in this country's history of racism and anti-Blackness. This public narrative in turn has spawned a diverse set of responsive actions in both the public and private sectors directed at addressing the effects of individual and structural racism on health. Yet missing from this linkage between police violence and racialized health disparities is any focus on the educational system, despite the increasing prevalence of police and standard policing practices in K-12 schools and the clear racial disparities of school policing. The central claim of this Essay is that school policing is an obvious public health issue. It sits at the nexus of two critical social determinants of health—education and racism—and requires targeted attention as such. The racialized nature of school-policing practices and the disparate outcomes for Black students are well documented. And, by applying a public health lens to this school police literature, specific individual- and aggregate-level health and mental outcomes become apparent. School policing negatively affects Black students' mental health and physical safety, diminishes protective health factors, and places students at heightened risk for justice-system entry. Finally, understanding school policing as a public health issue has significant potential benefits and practical implications, especially for the antiracist health-equity movement.

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Introduction

The deaths of George Floyd, Breonna Taylor, Tony McDade, and Ahmaud Arbery, and the long list of Black victims who preceded them have emboldened a new public narrative naming police violence as a public health crisis rooted in racism and anti-Blackness.[1] A growing body of research underscores such discourse, showing associations between a range of negative health and mental health outcomes for Black people and Black communities and both instances of excessive physical violence and death at the hands of police officers[2] and more commonplace usage of policing tactics including intimidation, verbal assaults, and stops.[3]

Following last year's national uprisings, government leaders, the public and private sectors, and academics all responded swiftly, taking actions including declaring racism a public health issue,[4] funding new health and racial-justice initiatives,[5] and calling for health-centered interventions to

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1. *See* Press Release, Am. Pub. Health Ass'n, APHA Calls Out Police Violence as a Public Health Crisis (June 4, 2020), https://perma.cc/8ZKM-NHD9; Livia Gershon, *Police Violence Is a Public Health Issue*, JSTOR DAILY (June 14, 2020), https://perma.cc/G559-9PYY; Press Release, Physicians for a Nat'l Health Program, Police Violence and Racism Are Public Health Emergencies (June 2, 2020), https://perma.cc/FW5V-K5WP; Jacqueline Howard, *Racism Is a Public Health Issue and "Police Brutality Must Stop," Medical Groups Say*, CNN (June 1, 2020, 9:01 AM ET), https://perma.cc/XU3E-7VPW; Jessie Hellmann, *Health Groups Call Police Brutality a Public Health Issue*, THE HILL (June 1, 2020, 6:34 PM EDT), https://perma.cc/X8ME-C6T7; Len Strazewski, *Why Police Brutality Is a Matter of Public Health*, AM. MED. ASS'N (June 8, 2020), https://perma.cc/NC2A-LPHR. This Essay utilizes Warren and Coles' definition of anti-Blackness as the "socially constructed rendering of [B]lack bodies as inhuman, disposable, and inherently problematic." Chezare A. Warren & Justin A. Coles, *Trading Spaces: Antiblackness and Reflections on Black Education Futures*, 53 EQUITY & EXCELLENCE IN EDUC. 382, 383 (2020).

2. *See* Sirry Alang et al., *Police Brutality and Black Health: Setting the Agenda for Public Health Scholars*, 107 AM. J. PUB. HEALTH 662, 662, 663 (2017); Jordan E. DeVylder et al., *Elevated Prevalence of Suicide Attempts Among Victims of Police Violence in the USA*, 94 J. URB. HEALTH 629, 630-31 (2017); Melissa N. McLeod et al., *Police Interactions and the Mental Health of Black Americans: A Systematic Review*, 7 J. RACIAL & ETHNIC HEALTH DISPARITIES 10, 23-25 (2019).

3. *See* Dylan B. Jackson et al., *Police Stops Among At-Risk Youth: Repercussions for Mental Health*, 65 J. ADOLESCENT HEALTH 627, 631 (2019); Nikki Jones, *"The Regular Routine": Proactive Policing and Adolescent Development Among Young, Poor Black Men*, in PATHWAYS TO ADULTHOOD FOR DISCONNECTED YOUNG MEN IN LOW-INCOME COMMUNITIES: NEW DIRECTIONS FOR CHILD AND ADOLESCENT DEVELOPMENT 34-52 (Kevin Roy & Nikki Jones eds., 2014); Abigail A. Sewell & Kevin A. Jefferson, *Collateral Damage: The Health Effects of Invasive Police Encounters in New York City*, 93 J. URB. HEALTH S42, S54 (2016).

4. *See, e.g.*, DECLARATIONS OF RACISM AS A PUBLIC HEALTH ISSUE, AM. PUB. HEALTH ASS'N, https://perma.cc/LX72-2DUC (archived Jan. 21, 2021) (disaggregated and cataloged declarations by state, city, county, and locality).

5. *See, e.g.*, Press Release, Robert Wood Johnson Found., Policies for Action: Public Policy Research to Advance Racial Equity and Racial Justice—2020 Call for Proposals (Sept.
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mitigate racism's impact.[6] Though distinct, all of these actions were grounded in addressing the effects of individual and structural racism on health.[7] Yet the specific national and subnational attention on police violence[8] and racialized health disparities has not permeated into discussion of the educational system despite the increasing prevalence of police in K-12 schools,[9] documented racial disparities in school policing,[10] and the use of standard policing tactics in educational settings.[11]

30, 2020), https://perma.cc/GJQ2-VWDK; Press Release, California Wellness Found., Announcing $11.3 Million for COVID-19 Relief & Racial Justice (Aug. 24, 2020), https://perma.cc/GKF8-Y5YP.

6. *See, e.g.*, Jordan DeVylder, Lisa Fedina & Bruce Link, *Impact of Police Violence on Mental Health: A Theoretical Framework*, 110 AM. J. PUB. HEALTH 1704, 1708-10 (2020); Catherine dP Duarte et al., *Applications of the American Public Health Association's Statement on Addressing Law Enforcement Violence as a Public Health Issue*, 110 AM. J. PUB. HEALTH S30, S30-S32 (2020); J. Nwando Olayiwola et al., *Making Anti-Racism a Core Value in Academic Medicine*, HEALTH AFF. BLOG (Aug. 25, 2020), https://perma.cc/L7JG-YDGZ.

7. *See, e.g.*, Press Release, Robert Wood Johnson Found., Statement from Richard Besser, MD, on Racial Injustice, Violence, and Health in America (June 2, 2020), https://perma.cc/8F3A-XMHY ("[H]ealth disparities, and often the diseases themselves, stem in part from the stress of being silenced, ignored, oppressed, and targeted for violence—too often by those institutions and individuals entrusted to protect all people").

8. For purposes of this Essay, I adopt Osagie Obasogie and Zachary Newman's broad definition of the term "police violence" indicating both a systemic nature and far-reaching scope. Osagie K. Obasogie & Zachary Newman, *Police Violence, Use of Force Policies, and Public Health*, 43 AM. J.L. & MED. 279, 279 n.1 (2017).

9. *See* F. CHRIS CURRAN, EDUC. POL'Y RSCH. CTR., UNIV. OF FLA., THE EXPANDING PRESENCE OF LAW ENFORCEMENT IN FLORIDA SCHOOLS: RESEARCH REPORT 2020, at 3 (2020) (ten-year analysis of law enforcement in public schools showing a 33% increase nationally); SAMUEL CORREA & MELISSA DILIBERTI, INST. OF EDUC. SCIS., U.S. DEP'T OF EDUC., POLICIES OUTLINING THE ROLE OF SWORN LAW ENFORCEMENT OFFICERS IN PUBLIC SCHOOLS 1 (2020) (finding that in the 2017-2018 school year a sworn law enforcement officer was present at least once a week in 51% of public schools); Ben Brown, *Evaluations of School Policing Programs in the USA, in* HANDBOOK OF SCHOOL SECURITY, SURVEILLANCE AND PUNISHMENT 327-28 (Jo Deakin, Emmeline Taylor & Aaron Kupchik eds., 2018).

10. *See* GEORGETOWN L. CTR. ON POVERTY & INEQUAL., DATA SNAPSHOT: 2017-2018— NATIONAL DATA ON SCHOOL DISCIPLINE BY RACE AND GENDER 1-4 (2020); AMIR WHITAKER, SYLVIA TORRES-GUILLÉN, MICHELLE MORTON, HAROLD JORDAN, STEFANIE COYLE, ANGELA MANN & WEI-LING SUN, ACLU S. CAL., COPS AND NO COUNSELORS: HOW THE LACK OF SCHOOL MENTAL HEALTH STAFF IS HARMING STUDENTS 7 (2019); ADVANCEMENT PROJECT, WE CAME TO LEARN: A CALL TO ACTION FOR POLICE-FREE SCHOOLS 52-54 (2018).

11. *See, e.g.*, BrieAnna J. Frank, *Officer Used Pepper Spray to Break up Phoenix Middle School Fight, Police Confirm*, ARIZ. REP. (last updated Oct. 25, 2019, 8:33 PM MT), https://perma.cc/W7L3-WPAA; Emma Ockerman, *A School Police Officer in Florida Was Arrested for Body-Slamming a 15-Year-Old Student*, VICE (Nov. 6, 2019, 7:56 AM), https://perma.cc/X7RW-TYGB.

The failure to approach school policing as an obvious public health issue is a flaw within the current movement that requires targeted attention.[12] While there exist multiple empirical pathways to constructing a racial-health-equity agenda inclusive of school policing,[13] that agenda cannot be constructed until it is *first* conceptually located within the domain of public health. That is the aim of this Essay.

The Essay proceeds in three parts. First, it presents some brief background on school policing, with specific attention to the racialized nature of police practices and disparate outcomes for Black students. Second, it exposes the ways in which school policing is not just a criminal justice or civil rights issue. Specifically, it argues that when one applies a public health lens to school police literature it reveals specific individual- and aggregate-level health and mental outcomes. These associations, while not conclusive, strongly suggest that school policing should be, at a minimum, investigated from a public health perspective. Lastly, the Essay describes potential benefits and practical implications of a public health approach to school policing.

I. Police and Schools

Historical evidence from the era of state-sanctioned slavery to the present illustrates how schools regularly have employed often-violent policing and disciplinary practices rooted in racism and anti-Blackness to control students.[14] While many policies and practices have changed over

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12. I have argued a similar disconnection exists in the context of exclusionary and punitive school discipline. *See* Thalia González, Alexis Etow & Cesar De La Vega, *Health Equity, School Discipline Reform, and Restorative Justice*, 47 J.L. MED. & ETHICS 47, 47-48 (2019); Thalia González, Alexis Etow & Cesar De La Vega, *School Discipline Is a Public Health Crisis*, BILL OF HEALTH (Oct. 6, 2020), https://perma.cc/7CQX-VSEB.

13. *See, e.g.,* Chandra L. Ford & Collins O. Airhihenbuwa, *Critical Race Theory, Race Equity, and Public Health: Toward Antiracism Praxis*, 100 AM. J. PUB. HEALTH S30, S34 (2010) (introducing and describing a new public-health–critical-race framework that adapts Critical Race Theory for public health research and practice); Angela P. Harris & Aysha Pamukcu, *The Civil Rights of Health: A New Approach to Challenging Structural Inequality*, 67 UCLA L. REV. 758, 825 (2020) (defining "the civil rights of health" framework for addressing health disparities); Chandra L. Ford, *Graham, Police Violence, and Health Through a Public Health Lens*, 100 B.U. L. REV. 1093, 1095, 1097 (2020) (utilizing the public-health–critical-race framework to consider "whether police killings of Black people with impunity constitutes a public health issue").

14. *See* Michael J. Dumas, *Against the Dark: Antiblackness in Education Policy and Discourse*, 55 THEORY INTO PRAC. 11, 16 (2016) (describing how the design of the American educational system is grounded in anti-Blackness); Steven L. Nelson & Ray Orlando Williams, *From Slave Codes to Educational Racism: Urban Education Policy in the United States as the Dispossession, Containment, Dehumanization, and Disenfranchisement of Black Peoples*, 19 J.L. & SOC'Y 82, 85 (2019) (arguing that urban education policy is rooted in the

time, the use of school-based law enforcement, most commonly represented as school resource officers (SROs),[15] as a mechanism of social control has not diminished. In fact, the opposite is true. Over the last fifty years, Black students have faced a growing epidemic of policing and criminalization in their schools.[16] The increasing number of police officers in schools during the 1960s and 1970s was linked to social and political attitudes and legislation that viewed youth through the lens of criminal justice.[17] In the 1980s and 1990s, Black students were subject to law-and-order approaches, including broken-window policing strategies, that characterized them as "superpredators."[18] Criminal justice priorities shaped zero-tolerance educational environments and enlarged the scope of law enforcement practices in schools.[19]

In the aftermath of high-profile school shootings and under the banner of safety and prevention, federal and state policies have further broadened the scope and power of school policing and expanded funding for school-based law-enforcement officers.[20] Research has shown this has not only failed to create safer schools, but resulted in significant racialized consequences. For example, in 2018, the Government Accountability Office found that Black students were "disproportionately disciplined" relative to their peers, whether

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"dispossession, containment, dehumanization, and disenfranchisement of Black peoples in the United States"); Connie Wun, *Against Captivity: Black Girls and School Discipline Policies in the Afterlife of Slavery*, 30 EDUC. POL'Y 171, 173, 179 (2016) (describing school discipline as an "instrument in the 'afterlife of slavery'" that prioritizes the "captivity" of Black people and positions Black students as "perpetually and involuntarily open to surveillance and control.").

15. *See* ANTHONY PETROSINO, TREVOR FRONIUS & DARIUS TAYLOR, REG'L EDUC. LAB'Y AT WESTED, RESEARCH IN BRIEF: SCHOOL-BASED LAW ENFORCEMENT 1-2 (2020) (defining the main types and primary role of school-based law enforcement).

16. *See* MEGAN FRENCH-MARCELIN & SARAH HINGER, ACLU, BULLIES IN BLUE: THE ORIGINS AND CONSEQUENCES OF SCHOOL POLICING 10-12 (2017); *see also supra* notes 9-11 and accompanying text.

17. *See* Elizabeth Hinton, *Creating Crime: The Rise and Impact of National Juvenile Delinquency Programs in Black Urban Neighborhoods*, 41 J. URB. HIST. 808, 815 (2015) (describing legislation that "firmly embedded the carceral state in black urban neighborhoods" and "brought surveillance equipment, patrol forces, and probation officers into the everyday lives of young Americans who survived on public assistance, lived in housing projects, or attended urban public schools").

18. FRENCH-MARCELIN & HINGER, *supra* note 16, at 7.

19. *See id.* at 7-9.

20. *See id.* at 8, 10-11; F. CHRIS CURRAN, UNIV. OF FLA., THE EXPANDING PRESENCE OF LAW ENFORCEMENT IN FLORIDA SCHOOLS 3 (2020); Denise C. Gottfredson et al., *Effects of School Resource Officers on School Crime and Responses to School Crime*, 19 CRIMINOLOGY & PUB. POL'Y 905, 907-08 (2020).

through suspensions or referral to law enforcement.[21] The following year, research drawing on the Department of Education's Civil Rights Data Collection indicated that Black students were arrested in schools at a rate three times that of white students[22] yet did not have higher rates of school misbehavior than their white peers.[23] Such racial disparities in school policing are not an anomaly and are documented by civil rights advocates, public-policy organizations, and researchers alike.[24] Furthermore, the United States incarcerates youth at higher rates than other countries[25] with the burden falling most heavily on youth of color.[26] Together, these data underscore how school police and policing practices not only fuel the persistent school-to-prison pipeline but function to disrupt the overall educational experience of Black students, especially those with disabilities.

II. School Policing and Public Health

Public health can be defined as the "[t]he art (i.e., practice) and science (i.e., research) of protecting and improving the health of communities."[27] The central aim of the field is to solve fundamental challenges of population health by addressing a range of externalities or determinants (such as social, political, economic, and environmental conditions and contexts) that contribute to health inequities.[28] As the World Health Organization explains,

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21. U.S. GOV'T ACCOUNTABILITY OFF., GAO-18-258, K-12 EDUCATION: DISCIPLINE DISPARITIES FOR BLACK STUDENTS, BOYS, AND STUDENTS WITH DISABILITIES 12 (2018).

22. *See* WHITAKER et al., *supra* note 10, at 5.

23. *See* ADVANCEMENT PROJECT, *supra* note 10, at 38.

24. *See* ACLU OF FLA., THE COST OF SCHOOL POLICING: WHAT FLORIDA'S STUDENTS HAVE PAID FOR A PRETENSE OF SECURITY 17 (2020); Kristen Harper & Deborah Temkin, *Compared to Majority White Schools, Majority Black Schools Are More Likely to Have Security Staff*, CHILD TRENDS (Apr. 26, 2018), https://perma.cc/DD9E-XL74; DANIEL J. LOSEN & PAUL MARTINEZ, LEARNING POL'Y INST. & CTR. FOR C.R. REMEDIES, LOST OPPORTUNITIES: HOW DISPARATE SCHOOL DISCIPLINE CONTINUES TO DRIVE DIFFERENCES IN THE OPPORTUNITY TO LEARN 6 (2020); *Which Students Are Arrested the Most?*, EDUC. WEEK (2017), https://perma.cc/A8PD-2L3D (showing that Black students are just 15.5% of overall enrollment but represent 33.4% of students arrested and 25.8% of students referred to law enforcement); ADVANCEMENT PROJECT, *supra* note 10, at 38.

25. *See* Peter Wagner & Wendy Sawyer, *States of Incarceration: The Global Context 2018*, PRISON POL'Y INITIATIVE (June 2018), https://perma.cc/NV7M-RSFG.

26. *See* Wendy Sawyer, *Youth Confinement: The Whole Pie 2019*, PRISON POL'Y INITIATIVE (Dec. 19, 2019), https://perma.cc/E9QU-CNH9.

27. Ford & Airhihenbuwa, *supra* note 13, at S31.

28. Health inequities are systematic differences in the opportunities groups have to achieve optimal health, leading to disparate and *avoidable* differences in health outcomes. *See* Paula Braveman, *Health Disparities and Health Equity: Concepts and Measuremen*t., 27 ANN. REV. PUB. HEALTH 167, 180-81 (2006).

the "overall vision is to promote greater health and well-being in a sustainable way, while strengthening integrated public health services and reducing inequalities."[29] For the last ten years, the social determinants of health (SDOH) have functioned in the United States as an explanatory mechanism and organizing principle to recognize how social factors lead to health disparities.[30] Defined, the SDOH represent the "conditions in the places where people live, learn, work, and play that affect a wide range of health and quality-of-life risks and outcomes."[31] The SDOH framework also "includes feedback loops that represent the nonlinear and iterative nature of social determinants."[32] And while institutional and interpersonal racism are accepted as aspects of the social environment that impact the risk for violence, the current SDOH framework does not formally define police violence as a social determinant.[33]

Under the SDOH framework, education functions as a key determinant and strong predictor of chronic disease, social and economic instability, incarceration, and even life expectancy.[34] For example, by age twenty-five, individuals with a high school degree can expect to live over ten years longer than those without one.[35] Given this, it is beyond dispute that policies and

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29. *Public Health Services*, WORLD HEALTH ORG., https://perma.cc/H9TV-DABD (archived Jan. 21, 2021).

30. *See* Ruqaiijah Yearby, *Structural Racism and Health Disparities: Reconfiguring the Social Determinants of Health Framework to Include the Root Cause*, 48 J.L. MED. & ETHICS 518, 518 (2020); *see also* SAMANTHA ARTIGA & ELIZABETH HINTON, HENRY J. KAISER FOUND., BEYOND HEALTH CARE: THE ROLE OF SOCIAL DETERMINANTS IN PROMOTING HEALTH AND HEALTH EQUITY 2-3 (2018).

31. *Social Determinants of Health: Know What Affects Health*, CTRS. FOR DISEASE CONTROL & PREVENTION (Aug. 19, 2020, 12:00 AM), https://perma.cc/W46H-DQ64 (hyphenation altered).

32. Theresa L. Armstead, Natalie Wilkins & Maury Nation, *Structural and Social Determinants of Inequities in Violence Risk: A Review of Indicators*, 49 J. CMTY. PSYCH. 878, 879 (2021).

33. *See* McLeod et al., *supra* note 2, at 10 (arguing that "police brutality is a social determinant of health and can lead to poor health outcomes among Black Americans."); Yearby, *supra* note 30, at 523-24 (discussing the incomplete nature of the current SDOH framework and arguing that it must be revised to include structural racism as the root cause of racial health disparities).

34. *See* Off. of Disease Prevention & Health Promotion, U.S. Dep't of Health & Hum. Servs., *Social Determinants of Health*, HEALTHYPEOPLE.GOV, https://perma.cc/5PC5-DEQ5 (archived Jan. 21, 2021); *see also* CTR. ON SOCIETY & HEALTH, VA. COMMONWEALTH UNIV., WHY EDUCATION MATTERS TO HEALTH: EXPLORING CAUSES (Feb. 13, 2015), https://perma.cc/4TU9-2GVT; S. Jay Olshansky et al., *Differences in Life Expectancy Due to Race and Educational Differences Are Widening, and Many May Not Catch Up*, 31 HEALTH AFFS. 1803, 1805-06 (2012).

35. *See* BRIAN L. ROSTRON, JOHN L. BOIES & ELIZABETH ARIAS, U.S. DEP'T OF HEALTH & HUMAN SERVS., EDUCATION REPORTING AND CLASSIFICATION ON DEATH CERTIFICATES IN

practices within schools are health policies and practices.[36] However, this Essay argues that school policing is not a public health issue just because education is a social determinant of health. Rather, school policing is also a public health issue because it sits at the nexus of two critical social determinants of health: education and racism.[37] And that, at a minimum, it negatively affects Black students' mental health, disrupts their educational attainment, diminishes their social supports (school-based health protective factors), and places them at heightened risks for justice-system involvement.

Under the social-ecological model of public health,[38] the presence of such social contexts and outcomes should alone justify consideration of school policing within that model's domain. However, when viewed in totality—and given the ever-growing evidence base demonstrating relationships between policing and negative health outcomes for Black Americans—the coexistence and operation at multiple levels of influence within one system (education) substantiates an argument for including school policing in the public health discussion and racial health equity agenda.

THE UNITED STATES 7 (2010). The precise effect is 10-12 years for women and 11-16 years for men. *Id.*

36. While there is no literature or public discourse that contends school policies are not health policies, there remains a disconnect between the fields of education and public health. *See supra* note 12.

37. *See* Jennifer Jee-Lyn García & Mienah Zulfacar Sharif, *Black Lives Matter: A Commentary on Racism and Public Health*, AM. J. PUB. HEALTH, Aug. 2015, at e27, e28; Maria Trent, Danielle G. Dooley & Jacqueline Dougé, *The Impact of Racism on Child and Adolescent Health*, PEDIATRICS, Aug. 2019, at 1; Yin Paradies et al., *Racism as a Determinant of Health: A Systematic Review and Meta-Analysis*, PLOS ONE, Sept. 23, 2015, at 1, 2. An alternative view of structural discrimination, including racism, is presented by public health law scholar Ruqaiijah Yearby. Yearby argues that the SDOH framework should be revised to position structural discrimination as the "root cause of racial health disparities, which influences all of the key systems." Yearby, *supra* note 30, at 524.

38. A social–ecological model considers the dynamic interplay between social contexts and environmental factors and influences, which interact to affect individual and population health outcomes.

Figure

Sample of School Policing Studies and Public Health Categories

Health and Mental Health Categories	Finding / Outcome	Source
Physical violence	SROs use excessive force against students with disabilities.	Shaver & Decker (2017)[39]
Post-traumatic stress disorder	Students who experienced police stops in schools reported post-traumatic stress following stop.	Jackson et al. (2019)[40]
Emotional distress	Students who experienced police stops in schools reported emotional distress during stop.	Jackson et al. (2019)[41]
Educational attainment	Exposure to three-year federal grant for school police decreased high school graduation rates by 2.5 percent and decreased college enrollment rates by 4 percent.	Weisburst (2019)[42]
	Associations between increased levels of exclusionary discipline and poorer student achievement on end-of-year reading and math tests.	Perry & Morris (2014)[43]
Health protective factor (peer connectedness)	Some students who experienced police stops in schools felt social stigma and shame.	Jackson et al. (2019)[44]

39. *See* Elizabeth A. Shaver & Janet R. Decker, *Handcuffing a Third Grader? Interactions Between School Resource Officers and Students with Disabilities*, 2017 UTAH L. REV. 229, 229-31; *see also* ADVANCEMENT PROJECT, *supra* note 10.

40. *See* Jackson et al., *supra* note 3, at 631.

41. *See id.* Youth who were stopped at school experienced higher levels of emotional distress, social stigma and post-traumatic stress than youth stopped outside of school. *See id.*

42. Emily K. Weisburst, *Patrolling Public Schools: The Impact of Funding for School Police on Student Discipline and Long-term Education Outcomes*, 38 J. POL'Y ANALYSIS & MGMT. 338, 339 (2019).

43. Brea L. Perry & Edward W. Morris, *Suspending Progress: Collateral Consequences of Exclusionary Punishment in Public Schools*, 79 AM. SOCIO. REV. 1067, 1082-83 (2014).

44. Jackson et al., *supra* note 3, at 631.

Health and Mental Health Categories	Finding / Outcome	Source
Health protective factor (school connectedness)	Students with higher levels of SRO interactions experienced lower school connectedness.	Theriot (2016)[45]
Health protective factor (school climate)	Presence of SROs can increase students' negative feelings of school climates.	Kupchik (2010)[46]
Risk for justice system involvement	Students were more likely to be referred to the criminal justice system in schools with SROs.	Devlin & Gottfredson (2018)[47]
	Black girls were seven times more likely to be suspended from school and nearly four times more likely to be arrested at school than their white peers.	Inniss-Thompson (2017)[48]

As the mapping in the Figure indicates, it is likely that school policing has a net effect on individual or population health outcomes. Experiences of physical harm, stress, and trauma resulting from policing can lead to mental health disorders and conditions such as depression and anxiety.[49] Consider, for example, school connectedness and positive school climate, which can function as protective health factors to buffer youth against emotional distress and suicidal ideation and attempts.[50] When school connectedness—students' belief

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45. Matthew T. Theriot, *The Impact of School Resource Officer Interaction on Students' Feelings About School and School Police,* 62 CRIME & DELINQ. 446, 461 (2016).

46. *See* AARON KUPCHIK, HOMEROOM SECURITY: SCHOOL DISCIPLINE IN AN AGE OF FEAR 115-16 (2010) (co-authored in part with Nicole L. Bracy) (describing how police officers in schools can "contribute to students' sense of alienation from the school").

47. Deanna N. Devlin & Denise C. Gottfredson, *Policing and the School-to-Prison Pipeline, in* THE PALGRAVE INTERNATIONAL HANDBOOK OF SCHOOL DISCIPLINE, SURVEILLANCE, AND SOCIAL CONTROL 291, 299-300 (Jo Deakin, Emmeline Taylor & Aaron Kupchik eds., 2018).

48. MISHA N. INNISS-THOMPSON, NAT'L BLACK WOMEN'S JUST. INST., SUMMARY OF DISCIPLINE DATA FOR GIRLS IN U.S. PUBLIC SCHOOLS: AN ANALYSIS FROM THE 2013-2014 U.S. DEPARTMENT OF EDUCATION OFFICE FOR CIVIL RIGHTS DATA COLLECTION 5 (2017).

49. *See* McLeod et al., *supra* note 2, at 13, 23, 25; *see also* Chandni Sheth, Erin McGlade & Deborah Yurgelun-Todd, *Chronic Stress in Adolescents and Its Neurobiological and Psychopathological Consequences: An RDoC Perspective*, 1 CHRONIC STRESS 1, 1-4 (2017).

50. *See* CTRS. FOR DISEASE CONTROL & PREVENTION, U.S. DEP'T OF HEALTH & HUM. SERVS., SCHOOL CONNECTEDNESS: STRATEGIES FOR INCREASING PROTECTIVE FACTORS AMONG YOUTH 3, 5, 7 (2009); Clea A. McNeely, James M. Nonnemaker & Robert W. Blum, *Promoting School Connectedness: Evidence from the National Longitudinal Study of Adolescent Health*, 72 J. SCH. HEALTH 138, 138 (2002); David Osher & Juliette Berg, EDNA BENNET

that adults in their school care about their learning and about them as individuals[51]—is diminished or students perceive their school climate as negative, it places them at risk for engaging in high-health-risk behaviors and increases feelings of distrust, disconnection, and trauma.[52] Research also shows that school connectedness and school climate can mitigate or exacerbate absenteeism, low academic engagement, and dropout.[53] Lower levels of educational attainment are not only correlated with a range of negative health outcomes, but detrimental socioeconomic outcomes.[54] Furthermore, considering the role of school police in the school-to-prison pipeline, the relationship to public health is straightforward: once involved in the justice system, Black youth experience deleterious health outcomes during and following confinement.[55] Lastly, studies on the impact of discrimination on health have found it to be associated with poorer physical health, and higher rates of stress, depression, and schizophrenia.[56]

It is also significant that the potential proximate health and mental health effects of school policing do not occur in isolation from a larger social context. Policing in schools exists against a backdrop of high levels of stress,[57] complex

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PIERCE PREVENTION RSCH. CTR., PA. STATE UNIV., *School Climate and Social Emotional Learning: The Integration of Two Approaches* 8 (2018), https://perma.cc/3Z6C-DCU5; *see also* Gwendolyn Puryear Keita, *Improving School Climate to Reduce Student Health Risks*, MONITOR PSYCHOL., Nov. 2015, at 54-55.

51. *See* CTRS. FOR DISEASE CONTROL & PREVENTION, *supra* note 50, at 3.

52. *Cf.* Thalia González & Rebecca Epstein, CTR. ON POVERTY AND INEQUALITY, GEO. U. L. CTR., *Increasing School Connectedness for Girls: Restorative Justice as a Health Equity Resource* 2, 4 (2020).

53. *See* TR. FOR AMERICA'S HEALTH, PAIN IN THE NATION: THE DRUG, ALCOHOL, AND SUICIDE CRISES AND THE NEED FOR A NATIONAL RESILIENCE STRATEGY 132 (2017).

54. *See* JENNIFER CHEESEMAN DAY & ERIC C. NEWBURGER, U.S. CENSUS BUREAU, THE BIG PAYOFF: EDUCATIONAL ATTAINMENT AND SYNTHETIC ESTIMATES OF WORK-LIFE EARNINGS 2 fig.1 (2002).

55. *See* Thalia González, *Youth Incarceration, Health, and Length of Stay*, 45 FORDHAM URB. L.J. 45, 46-47 (2017).

56. *See* Elizabeth A. Pascoe & Laura Smart Richman, *Perceived Discrimination and Health: A Meta-Analytic Review*, 135 PSYCHOL. BULL. 531, 543-44 (2009).

57. *See, e.g.*, O. Kenrik Duru et al., *Allostatic Load Burden and Racial Disparities in Mortality*, 104 J. NAT'L MED. ASS'N 89, 92-93 (2012); Marina Post et al., *Dimensions of Trauma and Specific Symptoms of Complex Posttraumatic Stress Disorder in Inner-City Youth: A Preliminary Study*, 29 VIOLENCE & VICTIMS 262, 262 (2014); Yadira M. Sanchez et al., *Adverse Life Events, Coping and Internalizing and Externalizing Behaviors in Urban African American Youth*, 22 J. CHILD & FAM. STUD. 38, 38 (2013); Jeremy J. Taylor et al., *The Manifestation of Depression in the Context of Urban Poverty: A Factor Analysis of the Children's Depression Inventory in Low-Income Urban Youth*, 26 PSYCHOL. ASSESSMENT 1317, 1317 (2014); Kathryn E. Grant et al., *Psychological Symptoms Affecting Low-Income Urban Youth*, 19 J. ADOLESCENT RSCH. 613, 625-28 (2004).

trauma,[58] and adverse childhood experiences[59] in Black communities, all of which can negatively impact health and mental health. And for students who are exposed to high rates of community violence, such experiences can amplify the cumulative negative influences of early life adversity on their physical and mental health in adulthood.[60] As a result, the public health consequences of school policing can compound and exacerbate preexisting health disparities for individuals and communities. This may be particularly acute for Black students whose community-based experiences with policing (including trauma, stress, racism, and the like) could act as a dose–response relationship or effect. Simply put, the higher levels of exposure to police that a Black student experiences (inside and outside school) may increase their probability of negative health and mental health outcomes.

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58. *See* Kristin L. Hunt, Patricia M. Martens & Harolyn M.E. Belcher, *Risky Business: Trauma Exposure and Rate of Posttraumatic Stress Disorder in African American Children & Adolescents*, 24 J. TRAUMATIC STRESS 365, 365-66 (2011); NAT'L CHILD TRAUMATIC STRESS NETWORK, COMPLEX TRAUMA: IN URBAN AFRICAN-AMERICAN CHILDREN, YOUTH, AND FAMILIES 2 (2017).

59. *See* Nadine J. Burke et al., *The Impact of Adverse Childhood Experiences on an Urban Pediatric Population*, 35 CHILD ABUSE & NEGLECT 408, 411 (2011). *See generally* Roy Wade Jr. et al., *Adverse Childhood Experiences of Low-Income Urban Youth*, PEDIATRICS, July 2014, at e13, e13-e14 (2014) (qualitative study of childhood adversity, trauma and stress of adults from low-income Philadelphia neighborhoods and the potential significance of a broader understanding of stress and trauma in childhood that can predispose children to poor health outcomes as adults); INST. FOR SAFE FAMILIES, FINDINGS FROM THE PHILADELPHIA URBAN ACE SURVEY 24-25, B-2 to B-3 (2013) (ACE study conducted in an ethnically diverse and lower-income community that confirmed dose response relationship between poor health outcomes and ACEs and identified new urban ACE indicators).

60. *See* Vincent J. Felitti et al., *Relationship of Childhood Abuse and Household Dysfunction to Many of the Leading Causes of Death in Adults: The Adverse Childhood Experiences (ACE) Study*, 14 AM. J. PREVENTATIVE MED. 245, 251 (1998) (finding that the impact of adverse childhood events on health can be "strong and cumulative"); Eunju Lee, Heather Larkin & Nina Esaki, *Exposure to Community Violence as a New Adverse Childhood Experience Category: Promising Results and Future Considerations*, 98 FAMILIES SOC'Y: J. CONTEMP. SOC. SERVS. 69, 69, 74 (2017) (finding that community violence can adversely impact children's health); Anita Jones Thomas et al., *African-American Youth and Exposure to Community Violence: Supporting Change from the Inside*, 4 J. SOC. ACTION COUNSELING & PSYCH. 54, 54 (2012) (same); Raja Staggers-Hakim, *The Nation's Unprotected Children and the Ghost of Mike Brown, or The Impact of National Police Killings on the Health and Social Development of African American Boys*, 26 J. HUM. BEHAV. SOC. ENV'T 390, 390-91 (2016) (finding that violence can adversely impact health outcomes); Julia Burdick-Will, *Neighborhood Violence, Peer Effects, and Academic Achievement in Chicago*, 91 SOC. EDUC. 205, 219 (2018) (finding that community violence can impact children's educational attainment, one of the social determinants of health).

A public health approach to school policing offers a number of benefits. It focuses on socio-ecological drivers of disparities,[61] supports interventions at preventative[62] and structural levels,[63] expands invested stakeholders,[64] unsettles disciplinary conventions,[65] and offers diverse methodologies[66] to advance a contemporary justice agenda in which research, policy, and practice intertwine to expose and address racism as the root cause of health inequities.[67] It also reveals how racialized outcomes are a consequence of structural determinants, not merely a group of isolated incidents.[68] From this inclusive context—where school policing is not siloed as an education problem or a civil rights issue—the potential to disrupt intersecting social, political, economic, and legal conditions that prevent Black students from experiencing "a state of complete physical, mental and social well-being"[69] begins to shift from a conceptual idea to a reality.

Conclusion

Future research on school policing applying public health methodologies is essential. Following national civil uprisings and protests, a clear focus on exposing and addressing policing within the domain of public health has emerged. This is a critical step in the right direction, but falls short of a bold vision for an equitable society where Black lives matter. This Essay offers a necessary intervention into the legal literature by distinctly naming policing in schools as a public health issue. In doing so, it expands the possibility of legal reforms and policy interventions beyond that of education equity or civil rights. The presence and behaviors of police in schools is a matter of public health with real and serious consequences for either exacerbating or mitigating racialized health disparities. And as we continue to apply a public health lens to policing *outside* our schools, we must also turn our attention to what is happening *inside* our schools.

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61. *See* CTRS. FOR DISEASE CONTROL & PREVENTION, THE SOCIAL–ECOLOGICAL MODEL: A FRAMEWORK FOR PREVENTION (Jan. 28, 2020), https://perma.cc/FV27-28LT; Yearby, *supra* note 30, at 524.

62. *See* LAWRENCE O. GOSTIN & LINDSAY F. WILEY, PUBLIC HEALTH LAW: POWER, DUTY, RESTRAINT 4 (3rd ed. 2016).

63. *See* Arleen F. Brown et al., *Structural Interventions to Reduce and Eliminate Health Disparities*, 109 AM. J. PUB. HEALTH S72, S72-S73, S77 (2019).

64. Harris & Pamukcu, *supra* note 13, at 813, 825-32.

65. *See id.* at 825-26.

66. *See supra* note 13 and accompanying text.

67. *See* Yearby, *supra* note 30, at 520-24.

68. *See* García & Sharif, *supra* note 37, at e28.

69. WORLD HEALTH ORG. CONST. pmbl., cl. 2.