

Collaborate

Advocate

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ARE YOU PREPARED FOR A CRISIS ON CAMPUS?

School safety can be endangered by any number of threats. Stories in the news about school shootings are a constant reminder that schools no longer provide a our children with a safe haven. Additionally, with hundreds of earthquakes occurring across California every week, and the recent spate of wildfires, schools face the challenge of dealing with natural disasters. Having effective plans and procedures can help school districts handle and respond to a crisis, and potentially minimize the harm resulting from an unanticipated event.

All school districts are required to establish a safety plan under the California Education Code. Additionally, every California employer must provide and maintain a safe and healthful workplace for employees. Safety is the foundation of school success; without a safe school environment, teachers cannot teach and students cannot learn.

The following are some tools to assist districts with these challenges:

COMPREHENSIVE SAFETY PLAN:

The law requires that each school district develop a comprehensive safety plan, aimed at the prevention of, and education about, potential incidents involving crime, violence and other threats to safety on the school campus. Effective safety plans incorporate procedures for reporting child abuse. They should also include policies for pupils who commit serious acts which would lead to recommendations for suspension, expulsion, or mandatory expulsion. Accordingly, procedures for notifying teachers of dangerous pupils should also be adopted. Anti-harassment and anti-discrimination policies are also an essential part of a comprehensive safety plan. Provisions for school-wide dress codes prohibiting "gang apparel" are recommended. Additionally, school discipline guidelines, hate crime reporting protocols, response plans in case of release of pesticide and/or other toxic substances, and response plans for natural disasters should all be developed and disseminated.

EARTHQUAKE PROCEDURES:

The California Education Code also requires that all districts develop earthquake procedures as part of their safety plans. All school districts should have a building disaster plan. Additionally, protocols should be in place that explain protective measures for before, during, and after an earthquake. Schools must hold a "drop and cover" drill, whereby each pupil and staff member takes cover under a table or desk, once every quarter for elementary schools, and once per semester for secondary schools. Certificated and

classified employees should be knowledgeable of the district's earthquake emergency procedures. Lastly, school districts need to establish procedures to allow the Red Cross to use school buildings as shelters.

SCHOOL SAFETY & VIOLENCE PREVENTION:

In addition to the above mentioned areas, schools must also implement a strategic program designed to prevent school violence. The plan must assure pupils a safe physical environment as well as a respectful, accepting, and emotionally nurturing environment. Plans should also include zero tolerance policies for violence, guns, and/or drugs, and prohibit bullying.

COMPLIANCE ISSUES:

In addition to establishing school safety plans, there are statewide safety requirements. These requirements are mandatory and require schools to revise safety plans annually, and forward those safety plans to the school district or county office for approval. Schools must also report the status of school site safety plans annually in their School Accountability Report Cards. Districts are obligated to notify the State Department of Education of any school that fails to develop a comprehensive site safety plan. Additionally, as schools develop and revise their plans annually, notice to the public must be provided to allow for public input on the safety plans. Once a safety plan is finalized, each school must provide written notice of its safety plan to the mayor, representatives of employee and teacher organizations, local churches, and civic leaders.

WORKPLACE INJURY & ILLNESS PREVENTION PROGRAM:

As of 1991, every California employer must have a written and effective Injury and Illness Prevention Program ("IIPP"), under the Occupational Safety and Health Act (OSHA). Your IIPP should include: management commitment to the Program; assignment of a person with authority and responsibility for safety and health; safety communications system with employees; systems for assuring employee compliance with safe work practices; scheduled inspections and/or evaluation system of the program; accident investigation procedures; procedures for correcting unsafe/unhealthy conditions; safety and health training and instruction; and policies to ensure accurate records are kept and documented.

Ruiz & Sperow, LLP is available to assist schools and districts in developing or improving school safety plans to comply with all relevant laws, and to best ensure a safe work and learning environment for students, staff and administrators.

☐ M. Delgado and M. Nakano

**RESPONDING TO SPECIFIC
THREATS FROM THE PUBLIC:
TEMPORARY RESTRAINING ORDERS**

What should a school district do if one of its teachers is being stalked by a parent? What if a disgruntled ex-employee threatens a school administrator? Or if a general member of the public threatens to harm a school board member unless that member votes a particular way in an upcoming meeting? These are some of the issues that school districts across the state face in trying to maintain the delicate balance between providing a welcoming public school environment while protecting their students and employees and maintaining a controlled setting for education and public discourse.

First, it is important to remember that if there is ever a threat of violence or harm at any school site, local law enforcement should be called in immediately. One additional option, where one individual has received specific threats, is to obtain a restraining order against the person who has made the threat. A restraining order is a court order that legally prohibits an aggressor from stalking, harassing, sexually assaulting, or threatening violence against another person. The restraining order will specifically order the aggressor not to harass, contact, or go near the victim, and also order the aggressor not to have a gun. However, before the court grants a restraining order, the victim must demonstrate that he or she has suffered harassment, such as: violence or a credible threat of violence, or been subject to conduct that seriously alarms, annoys, or harasses the victim and has no legitimate purpose.

The court will first issue a temporary restraining order, which will typically last up to fifteen (15) days. Before expiration of the fifteen (15) days, a formal hearing is held where a judge will determine whether to issue a longer-

lasting order called an injunction, which extends the prohibition on contact to up to three (3) years. A restraining order is designed only to protect a specific person from threats.

If the restrained person violates the order, the district may call the police to enforce the provisions of the order. Also any breach of a restraining order is punishable by imprisonment up to one (1) year and a \$1,000 fine. This punishment usually serves as a powerful deterrent to prevent the aggressor from continuing to make threats or harass.

While a restraining order is an effective tool available to protect employees from outside threats, it is recommended that you consult with an attorney to determine whether a restraining order is the appropriate response for a specific situation. Depending on the nature and severity of the threat, it may be necessary to explore alternative or additional options.

□ M. Nakano

DISCIPLINING STUDENTS WITH DISABILITIES

Under the 2004 Individual with Disabilities Education Act (“IDEA”), school districts may discipline identified students with disabilities. However, when disciplining students with disabilities, districts must be careful to follow certain procedural safeguards, briefly outlined below.

DISCIPLINE LESS THAN 10 DAYS:

A student with disabilities can be suspended or otherwise removed from his or her educational program for ten (10) school days during any given school year. During this period, the district is NOT required to:

- Provide any educational services, unless the same are provided for students without disabilities;
- Conduct a functional behavioral assessment;
- Implement a behavioral intervention plan;
- Convene an Individualized Education Plan (“IEP”) team meeting; or
- Conduct a “manifestation determination.”

DISCIPLINE MORE THAN 10 DAYS:

However, if the district institutes a removal lasting more than 10 school days, or a series of shorter removals totaling more than 10 days in a school year, a complex series of procedural events is triggered under the IDEA. If the district wishes to suspend a student with a disability for a total of more than ten (10) days, the district MUST:

- Provide the pupil with free appropriate public education (“FAPE”) services to enable the student to continue to participate in the general curriculum;
- Convene an IEP meeting, within 10 days of the date the discipline was imposed;
- Notify parents in writing of the school's proposed change to the student's placement; and
- Conduct a “manifestation determination” to determine if the student's behavior was a “manifestation” of his/her disability. After a “manifestation determination” is conducted, the student’s parents or the district may appeal the results of the “manifestation determination” by requesting a hearing. The following procedures then apply to the appeal hearing:
- Hearing appealing the “manifestation determination” must take place within twenty (20) school days of the date the hearing is requested; and
- Pending appeal, the student may remain in an interim alternative educational setting, unless a parent and the state agree otherwise.

SERIOUS OFFENSES:

A student may be placed in an interim alternative educational setting, for *not more than* 45 school days *regardless* of whether the behavior is determined to be a manifestation of the child’s disability, if the child:

- Carried a deadly weapon;
- Possessed illegal drugs and/or controlled substances; or
- Inflicted serious bodily injury on another.

The areas of student discipline, special education, suspension, and expulsion are complex and constantly evolving. The procedures to be followed require familiarity with the IDEA, Education Code, and federal regulations.

□ M. Delgado

LEGAL UPDATES

EMPLOYMENT CASES

TEXT MESSAGES AND EMPLOYEE RESOURCES



With the growing use of text messaging as a common means of communication, another door is opened for potential employee misuse of employer resources and/or work time. Employers should be aware that their employee technology use agreements should be clear, strict, and formally enforced. A recent federal case demonstrates the dangers that are created for employers who fail to formally and consistently enforce use agreements with employees.

The Ninth Circuit Court of Appeals recently held that an employer violated the U.S. and California constitutions by obtaining and reviewing employees' text messages, even though the text-messaging services were available through the municipal employer's contract with a text messaging service provider. The Court decided against the employer, even though the employer had established a technology use policy and communicated to its employees that text messaging would be considered as e-mail, and therefore was subject to review and audit by the employer.

The city employer contracted with a wireless company to provide text-messaging services for its employees. The city maintained a general Computer Usage, Internet and E-mail Policy ("Policy") which stated that the use of the city's computers, other electronic equipment, networks, etc., was limited to city-related business, and access was not confidential. The Policy warned that "users should have no expectation of privacy or confidentiality when using these resources."

A city employee signed an acknowledgment of the Policy. He also attended an informational meeting, where attendees were informed that text messages would be treated the same as e-mail messages, and could be audited by the department. Employees were told, however, that the content of messages would not be audited if employees

reimbursed the department for charges associated with use over the contract's limits provided in each billing cycle.

A supervisor grew concerned that employees would exceed the contracted limit on text messages, and the department contacted the wireless provider to request transcripts of the messages. Internal affairs conducted an investigation of whether employees were wasting the city's time, and learned that many of the employees' messages were personal (not work-related), and that many were even sexually explicit. One employee and others he texted sued the wireless provider for violating the Stored Communications Act ("SCA"), and the municipal employer for violating the U.S. Constitution's Fourth Amendment prohibition against unlawful searches, as well as the California Constitution's privacy protection provision.

The Court held that the wireless provider violated the SCA, and found that the plaintiff employee, and those he had texted, had a reasonable expectation of privacy in the messages they exchanged. Despite the fact that the employer had a written Policy in place to remove the employee's expectation of privacy, the Court found that the Policy was insufficient to overcome the employee's expectation of privacy, because the employer was lax in actually enforcing its written Policy.

This case offers an example of one of the growing concerns employers face in maintaining control of their employees' use of resources, and managing employees' lawful expectations of privacy.

□ D. Jou

FOR INFORMATION ON TRAINING OR LEGAL GUIDANCE

Our attorneys are available to assist you with any of the topics contained in our newsletter as well as many other issues, including drafting policies, training and legal guidance. Please contact us as 510-594-7980 or ruizlaw@ruizlaw.com.

CALIFORNIA SUPREME COURT TO HEAR MEAL AND REST PERIODS CASE

On October 22, 2008, the California Supreme Court agreed to hear an important case about California Labor Code sections regarding break and meal periods requirements and applicable Industrial Welfare Commission Wage Orders.

Employees in the lawsuit claimed that the employer violated wage and hour laws in the way that it timed meal periods and provided break periods to its employees. The California Court of Appeals, disagreeing with the lower trial court, found that California law only requires employers to make available meal periods and rest periods, and not to ensure that their employees actually take the breaks offered them.

While the facts raised primarily focus on private employers, a California Supreme Court decision in this case may have broader implications for employers statewide.

□ D. Jou

NEW OPENING FOR LAWSUITS BY EMPLOYEES WHO CLAIM RETALIATION

The federal appeals court that controls California and several western states has recently made it easier for public employees to maintain lawsuits alleging that their employers retaliated against them for exercising free speech rights. In a recent decision by the Ninth Circuit Court of Appeals, the plaintiff, a former specialist for a school district had expressed concerns about the district's safety and emergency policies to district administrators. After he expressed his concerns, the plaintiff's position as a security specialist at one school was closed, and he was not rehired to the district in a different position. The plaintiff sued the district, alleging that he was denied the new position in unlawful retaliation for his complaints about the safety procedures, which constituted speech protected by the First Amendment of the U.S. Constitution.

In determining whether an employee engaged in constitutionally protected speech, courts consider whether

the speech in question was made as a public employee or a private citizen. Only speech made as a private citizen is protected by the First Amendment. Speech made in furtherance of a public employee's official job duties is not protected speech because it is made as an employee, not a private citizen.

In this case, the lower court dismissed the plaintiff's case at an early stage in litigation, on the grounds that the plaintiff did not act as private citizen when he made the complaints, because they were made pursuant to his job duties. On appeal of the dismissal, the Ninth Circuit reversed the dismissal, and instead found that where there is a genuine dispute about the scope of an employee's job duties (in order to determine whether the employee acted as a private citizen), courts cannot dismiss the case until a fact-finding process has occurred.

Prior to this decision, a court could dismiss a case upon its own determination that the employee did not act as a private citizen. Following this decision, any time a genuine dispute about whether a public employee acted as a private citizen exists, an employer cannot expect to have a case dismissed at an early, less expensive stage of litigation.

□ B. Shukla

EDUCATION CASES

EDUCATION CODE ADDS CYBERBULLYING AS GROUNDS FOR SUSPENSION & EXPULSION

California's Governor recently signed into law Assembly Bill ("AB") 86, introduced nearly two years ago by Assemblyman Ted Lieu (D-Torrance). The bill authorizes school officials to suspend or recommend for expulsion pupils who engage in bullying, including but not limited to, bullying by means of an electronic act. The rise in cyberbullying in particular, and its harmful effects, was tragically illustrated by the death of thirteen-year-old Megan Meier, the Missouri teen who committed suicide after being tormented through her account on MySpace.

AB 86 defines bullying as:

One or more acts by a pupil or group of pupils directed against another pupil that constitutes sexual harassment,

hate violence, or severe or pervasive intentional harassment, threats, or intimidation that is disruptive, causes disorder, and invades the rights of others by creating an intimidating or hostile educational environment, and includes acts committed personally or by means of an electronic act.

In enacting the bill, the legislature was careful to limit educators' responsibility over cyberbullying. To this end, a pupil cannot be suspended or expelled unless the bullying is related to school activities or school attendance. The bill says that principals can address bullying that takes place: (1) on school grounds, (2) while students are going to or coming from school; (3) during a lunch period, even if off campus; and (4) at off-campus school-sponsored activities.

□ M. Delgado

**CALIFORNIA COURT UPHOLDS \$300,000
VERDICT AGAINST DISTRICT FOR
PEER SEXUAL ORIENTATION HARASSMENT**

Earlier this month, a California court of appeals upheld a jury verdict of \$300,000 in monetary damages, plus attorney fees, against a school district for failing to effectively address peer sexual orientation harassment under the California Education Code. The court is the first to recognize that individual plaintiffs may bring a lawsuit for money damages for harassment under this provision of the Education Code.

The plaintiffs, two former students of the same high school, were verbally abused over a period of years by anti-gay slurs and threats. One of the students was physically assaulted and had his car vandalized. The students reported the bullying to school administrators and teachers, both in person and in writing. Both students eventually stopped attending the high school and completed studies toward their high school diplomas at home because of the harassment they suffered at school. The court found that the school district and individual defendants (the principal, assistant principal and superintendent) failed to sufficiently respond to the complaints to protect the students from the pervasive harassment.

Given this case and recent legislative changes in anti-discrimination laws and other bills regarding student safety, it is imperative that districts implement effective policies to prevent and address harassment, discrimination, hate violence, and bullying. School districts are encouraged to promulgate and aggressively enforce those policies to ensure student safety and equal access to educational opportunities.

□ M. Delgado

"ICE" ON CAMPUS - WHAT TO DO?




Over the last few years, U.S. Immigration and Customs Enforcement ("ICE") has markedly increased its neighborhood and workplace enforcement actions nationally, and in particular in the Bay Area. As recently as last spring semester, school districts reported concerns about ICE officers approaching students and/or parents on or near school campuses. School employees are particularly concerned about the effect of ICE officers' activities on district pupils and their families. How can ICE activity (or rumors of ICE activity) impact students' attendance or ability to participate effectively in class? How should your district respond if an ICE enforcement action approaches a school site? What controls does the district maintain over its school sites when faced with an ICE investigation or enforcement action? What, if anything, can or should your district do if students or employees are taken into ICE custody? Does the District have contact information for trusted adults for students in case their parents are taken into ICE custody and unable to pick up their children from school? What, if any, information is the District required to give to ICE if an investigation unit comes to campus?

The best response for a District is to be prepared with a contingency plan in case any of these or other ICE-related issues arise. For help devising a response plan for your district, or to schedule a training on basic facts of immigration law that every school district should have, please contact us.

□ H. Coffman

EEOC ISSUES NEW COMPLIANCE MANUAL ON RELIGIOUS DISCRIMINATION


 Title VII of the Civil Rights Act of 1964 (Title VII) provides numerous discrimination protections for employees, including protection from discrimination and harassment in employment due to personal religious beliefs or practices. From 1992 to 2007, the number of religious discrimination claims filed with the U.S. Equal Employment Opportunity Commission (EEOC), the federal agency in charge of enforcing Title VII laws, has doubled. At the same time, the EEOC has observed an increase in religious diversity in the United States.

In response to these developments, the EEOC adopted a new compliance manual providing a comprehensive review of Title VII protections over religious discrimination in the workplace, titled Religious Discrimination. This document replaces the EEOC's previous manual, titled Religious Accommodation. Employers relying on the old manual are advised to update and replace Religious Accommodation with the new Religious Discrimination manual. The EEOC has also released a companion booklet, titled Best Practices for Eradicating Religious Discrimination in the Workplace, and a supplement, titled Questions and Answers: Religious Discrimination in the Workplace. Documents available at: www.eeoc.gov/policy/compliance.html.

Employers should carefully review these new guidelines to ensure that their religious tolerance and accommodation policies and procedures as well as their responses to religious discrimination complaints are aligned with the EEOC's recommendations. The new guidelines provide an explanation of Title VII laws protecting employees from religious discrimination and harassment, including practical examples, recommended best practices for employers, and valuable insight into the analysis EEOC investigators perform in conducting an investigation in response to religious discrimination complaints filed with the EEOC.

While the EEOC's new manual provides helpful advice, employers should be mindful that each request for

accommodation or complaint of discrimination arises from unique circumstances, and must therefore be addressed on a case-by-case basis.

□ M. Nakano

HOME SCHOOLING ALLOWED BY CALIFORNIA APPEALS COURT

Parents may now lawfully home-school their children in California, even if they do not hold a teaching credential. Generally, California law compels enrollment and full-time attendance of children at a public school, unless (1) the child is enrolled in a private full-time day school and actually attends that private school, (2) the child is tutored by a person holding a valid state teaching credential for the grade being taught, or (3) one of a narrow set of exemptions to this law applies to the child.

In a recent case before the California Court of Appeals, the parents in the matter had a history of abuse, neglect, and failure to prevent sexual abuse of their children. The two youngest children in the family were declared dependents of the court. The children's attorney sought an order from the dependency court that they be sent to private or public school rather than be home-schooled by their mother, so that they could have regular contact with mandatory reporters of abuse and neglect. The dependency court declined the request, on the grounds that parents have an absolute constitutional right to home-school their children.

In March 2008, the California Court of Appeals stated that parents do not have constitutional right to home-school their children, and that home-schooling did not fit into any of the exceptions for a child's compulsory attendance at a public school.

In a rare act, the California Court of Appeals reversed its own decision of a few months ago. In its latest decision, the court concludes that state law does permit home-schooling as a species of private school education. Therefore, the court found that home-schooling may, in fact, fit within one of the exemptions to compulsory public school attendance in the statute. However, the statutory permission to home-school a child may still be outweighed

by the requirement to protect the safety of a child who is a dependent of the court.

School districts need to be aware of the developing case law in home-schooling and other waivers of compulsory public education for children, as decisions like this may ultimately lead to changes in public school enrollment. We will continue to update our readers on home-schooling and related legal issues as they arise in the courts and legislature.

□ O. Shim

**SCHOOL DISTRICT FREED FROM
REIMBURSEMENT AND ATTORNEYS' FEE
AWARD IN A DUE PROCESS
CHALLENGE OF IEP**

A federal appeals court recently found that a school district's procedural flaw during the development of an individualized educational program (IEP) did not deprive parents of their right to meaningful participation in a due process hearing.

The case focuses on L.M., an autistic, developmentally disabled child of two parents who spared no expense to obtain private in-home treatment for their son. The school district balked at the idea of continuing the in-home educational plan at public expense, and instead, offered an alternative plan. The matter ended up before an administrative law judge (ALJ), who conducted a four-day hearing to resolve the dispute, ultimately ruling in favor of the District.

The federal trial court, however, reversed the ALJ's award and ordered the District to reimburse the parents for in-home services, based on a procedural flaw in the development of the IEP: the parents had been limited to twenty minutes of classroom observation, whereas the District had up to three hours to observe the private educational program.

On appeal of the trial court's decision, the Ninth Circuit Court of Appeals found that in reversing the ALJ award, the trial court failed to consider whether the parents' ability to participate in the development of their child's

educational program was "significantly affected." The court found that this procedural error was harmless, because the parents' ability to participate in the development of their child's educational program was not "significantly affected" by the limited observation time. The court found that the parents participated in the due process hearing before the ALJ with help from an informed and knowledgeable expert, and there was no evidence to suggest that an additional seventy minutes of continuous observation of the classroom would have provided the parents with any information to undermine the ALJ's findings in favor of the District. As a result, the Ninth Circuit overturned the trial court's decision and vacated the reimbursement and attorneys' fees award.

□ O. Shim

LABOR CASE

**"NO MATCH"
LETTERS INSUFFICIENT AS
BASIS FOR TERMINATION**



An employer fired thirty-three (33) janitors without following discipline procedures contained in the collective bargaining agreement (CBA) with the employees' union, SEIU, because the employer had received so-called "no-match" letters from the Social Security Administration (SSA), indicating that the SSA was unable to match the employees in question with its database of valid social security numbers. The Social Security Administration (SSA) regularly sends "no-match" letters when it cannot match these employees with information in its database.

SEIU filed a grievance against the employer, arguing that the dismissal lacked just cause and therefore violated the CBA. The employer argued that SSA's "no-match" letter, combined with the employees' failure to submit proof they were eligible for valid social security cards within ten days, gave the employer "constructive notice" that the employees did not have proper documentation for employment. Employers are prohibited by federal law from knowingly employing workers who are not authorized for employment.

The arbitrator in the grievance held that there was no “convincing information” that the employees were undocumented, and ordered back pay and reinstatement of the employees. When the case was brought to federal court, however, the trial court vacated the arbitration award based on public policy, on the grounds that the employer did have constructive notice of the employees’ undocumented status. On appeal of the trial court’s decision, the Ninth Circuit Court of Appeals reinstated the arbitrator’s findings. The appeals court found that an employer must have “positive information” of an employee’s undocumented status to compel terminating the employment. The SSA’s no-match letters did not amount to this type of positive information about an employee’s eligibility for work authorization, and therefore the employer was wrong to terminate its workers based on those letters as evidence.

□ O. Shim

Ms. Coffman earned a J.D. from the University of California-Hastings College of the Law, and a Master of Arts in Law and Diplomacy from the Fletcher School of Law and Diplomacy at Tufts University through a dual-degree program. In law school, she taught local middle school students through the StreetLaw program. In her graduate program in international relations, she focused on the nexus between human rights and conflict resolution in different conflict regions. Prior to entering graduate school in 2000, Ms. Coffman developed a nationwide program for youth mediators (including school peer mediation program participants) at a Washington, D.C.-based non-profit organization. She earned her undergraduate degree in International Relations and French from Tufts. Ms. Coffman speaks French, Spanish and basic Russian, and is a trained mediator.

Ms. Coffman is glad to be back with her colleagues at Ruiz & Sperow, LLP, and looks forward to (re)connecting with clients and to sharing her background in education, employment, conflict resolution and immigration law.

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FIRM UPDATES

MEET THE ASSOCIATE: HEATHER ROBERT COFFMAN RETURNS TO RUIZ & SPEROW, LLP



In September 2008, Heather Robert Coffman returned to Ruiz & Sperow, LLP as an associate of the firm. Ms. Coffman first joined Ruiz & Sperow, LLP in 2005, when she worked primarily on employment, special education, student discipline and charter school issues for our clients. Prior to her work with Ruiz & Sperow, Ms. Coffman was an associate in an employment and civil rights firm. From 2006 to 2008, Ms. Coffman took a hiatus from Ruiz & Sperow, LLP to serve as a deportation defense fellow at the San Francisco-based immigration law firm Van Der Hout, Brigagliano & Nightingale, LLP. In this position, Ms. Coffman developed expertise in immigration and federal court litigation.

RUIZ & SPEROW, LLP UPCOMING SPEAKING ENGAGEMENTS

ACSA ANNUAL CONFERENCE

Thursday, November 6, 2008 1:45PM
Manchester Grand Hyatt Hotel
San Diego, CA

Celia Ruiz presents:

How to deal with the Emerging Threats of Internet Use: Access, Privacy & Cyberbullying

CSBA ANNUAL CONFERENCE

Friday, December 5, 2008 10AM
San Diego Convention Center
San Diego, CA

Celia Ruiz presents:

Effective Partnership to Address Gang Prevention