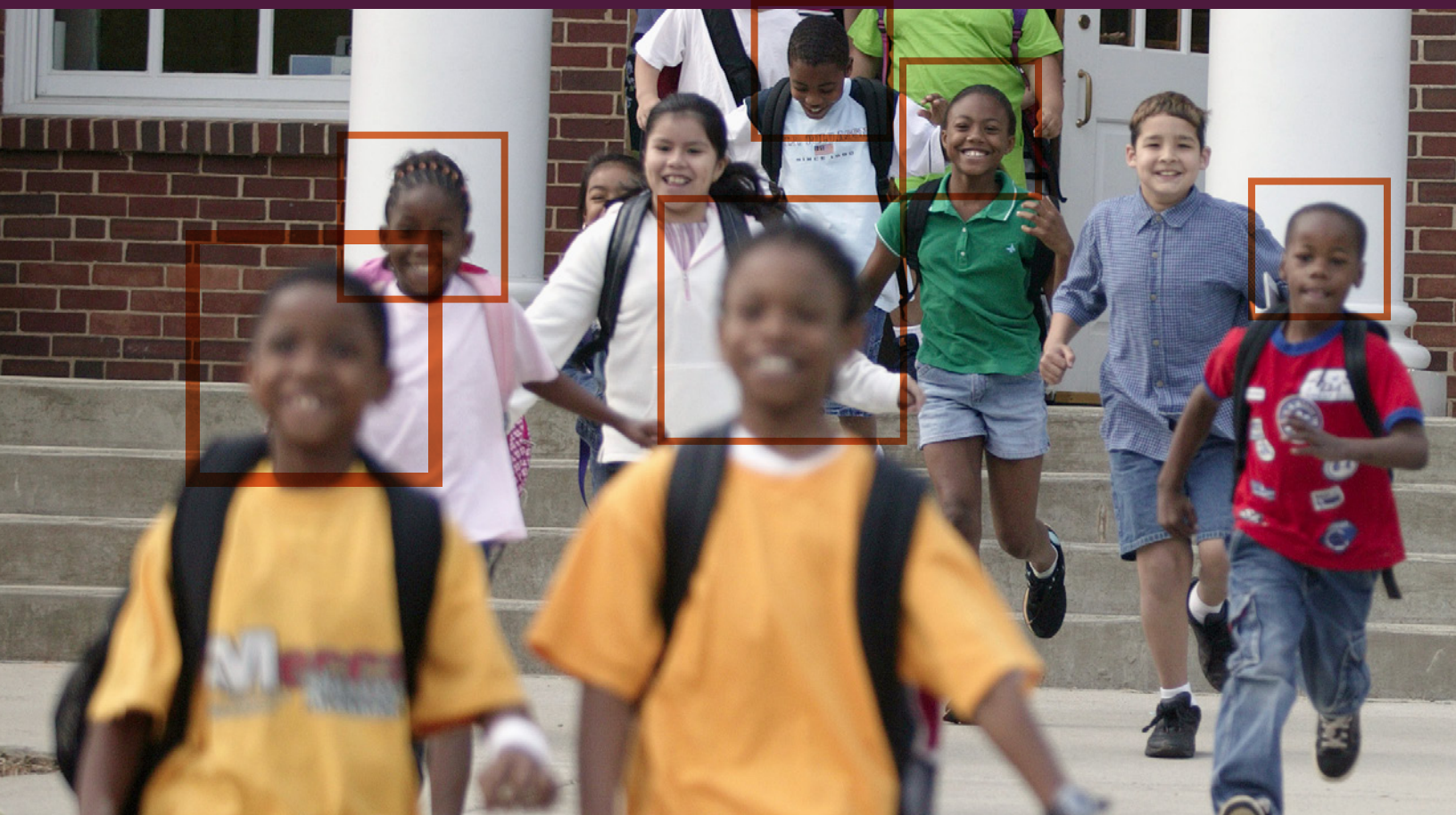


DIGITIZING THE SCHOOL-TO-PRISON PIPELINE

Pasco County's At-Risk Youth Program



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ACKNOWLEDGEMENTS

We would like to thank the following individuals for their editorial and research contributions: **Kesha Moore, Sandhya Kajeepeta, Clarence Okoh, Sarah Seo, Amia Trigg, Alaizah Koorji, Kaisha Oliver, Puneet Cheema, Jin Hee Lee, Carli Raben, Sam Boyd.** We are grateful for the partnership of the PASCO coalition and its members without whom this report would not be possible.

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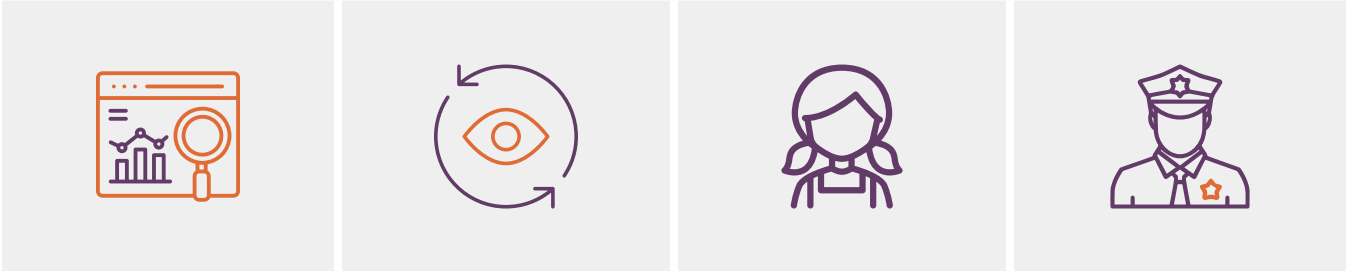
EXECUTIVE SUMMARY



The Pasco County Sheriff’s Office in Pasco County, Florida has operated an At-Risk Youth program, which produces a secret list of children that the Sheriff deems as “destined to a life of crime.” The list—developed in part by a rudimentary predictive policing¹ algorithm—classified children into various categories based on their perceived risk of engaging in future criminal activity. It was assembled without notifying either the children or their parents, and at one point contained over 17,000 students, with children as young as kindergartners and first graders flagged by law enforcement for additional monitoring.

The Sheriff’s Office constructed the list by combining information about children’s arrest records, abuse histories, and school performance. Building on the work of the *Tampa Bay Times*² and the People Against the Surveillance of Children and Overpolicing (P.A.S.C.O.) Coalition,³ this report finds that the aggregation of these data sources risks compounding racial biases and digitizing the school-to-prison pipeline for Black youth and other marginalized children in Pasco County, Florida.

Findings



In constructing the At-Risk Youth List, the Pasco County Sheriff’s Office used data points that are highly prone to bias against Black, Latinx, and queer children. These include various kinds of contact with the criminal legal system, educational demerits, and records of childhood trauma on file with child welfare agencies.

The number of students on the At-Risk Youth List from 2019-2021 ranged from 10,000 to over 17,000.⁴ Each year, 300-500 students were flagged for heightened monitoring.

Some children in the At-Risk Youth List were extremely young. At times, it included children as young as pre-kindergarten, and the January 2020 list included three kindergartners who were labeled “At-Risk” and flagged for additional monitoring.

In just four months between August and December 2018, law enforcement made at least 219 contacts with students who were labeled in the At-Risk Youth List as “critical,” “off-track,” or “at-risk.”

Recommendations:



End federal funding for predictive policing programs across the country.

Prohibit the use of police surveillance technologies in schools.

Increase local, state, and federal investments in school-based counseling, supportive services, and restorative justice programs

INTRODUCTION



Predictive Policing in Pasco County

The dramatic expansion of the criminal legal system since the 1970s has recently coincided with explosions in digitization and computation.⁵ Law enforcement agencies have increasingly relied on personal and surveillance data to direct their policing and enforcement approaches.⁶ This proliferation in police surveillance has been supported by federal grant funding, from “intelligence-led policing” initiatives in the aftermath of September 11, 2001, to local police departments’ current predictive policing programs.⁷ Research shows that the growth in the use of “big data” surveillance in policing has not only amplified traditional police surveillance, but has also transformed it by lowering the thresholds for inclusion in police databases and facilitating law enforcement’s access to and integration of records that do not have an explicitly criminal-legal purpose.⁸

In 2020, the *Tampa Bay Times* published an investigative series on the Pasco County, Florida Sheriff’s Intelligence-Led Policing (ILP) program, revealing “an intelligence operation that monitors, intimidates[,] and harasses families across the county.”⁹ Sheriff Chris Nocco launched the ILP in 2011,¹⁰ describing it as an approach that “emphasizes analysis and intelligence as pivotal to an objective, decision-making framework that prioritizes crime hot spots, repeat victims, prolific offenders and criminal groups.”¹¹

As part of the ILP, the Sheriff’s Office implemented a rudimentary, person-based predictive policing system, which entails law enforcement using certain data, criteria, and statistical models to classify specific individuals as “at risk” of committing future crime.¹² The ILP included¹³ at least three person-based predictive policing programs:¹⁴

→ **At-Risk Youth Program.** A secret list of children who were considered “destined to a life of crime,” which was assembled by law enforcement without notifying either the children or their parents.¹⁵ The Sheriff’s Office created this list by combining law enforcement records with children’s abuse histories and school performance records, which are made available to them by the Department of Children and Families and the Pasco County School Board.¹⁶ School Resource Officers (SROs)¹⁷ were instructed to use this list to surveil students.¹⁸ The At-Risk Youth Program received federal funding through the Department of Justice’s (DOJ) Students, Teachers, and Officers Preventing (STOP) School Violence Program.¹⁹ Court documents indicate that the Sheriff’s Office no longer uses the At-Risk Youth List, but it is unclear whether it continues to maintain and/or utilize the list’s underlying data.

→ **Prolific Offender Program.** A risk scoring system that incorporated the number and severity of offenses that an individual has been arrested for, regardless of whether they were found guilty, along with any purported gang affiliation and the amount of time since their most recent arrest to identify those whom the Sheriff’s Office characterized as “not likely to reform” and having “taken to a career of crime.”²⁰ The Sheriff’s Office surveilled and increased the scrutiny of individuals labeled “prolific offenders” and their families, a process that one former deputy described as “mak[ing] their lives miserable until they move or sue.”²¹ At least 10% of the people targeted by this program were under 18-years-old.²² The Prolific Offender Program received federal funding through DOJ’s Smart Policing Initiative.²³ While the Prolific Offender Program was discontinued in 2022, the Sheriff’s Office still permits surveillance of individuals they identify as “focused offenders.”²⁴

→ **Focused Deterrence Program.** A risk assessment system that used data on criminal history; gang membership; suspected victimization in a shooting; involvement with drug distribution, possession, and use; and contact with the Pasco County Sheriff’s Office to create two lists: Violent Prolific Offenders (VPOs) and Narcotic Prolific Offenders (NPOs).²⁵ The Sheriff’s Office sent letters to those labeled NPOs or VPOs, pressuring them to participate in social services or face “the highest level of accountability for [all current and] future [criminal acts],” and sharing their names and criminal histories with other local, state, and federal law enforcement entities.²⁶ In contrast to the Prolific Offender Program, underaged youth were excluded from these lists.²⁷ The Focused Deterrence Program received federal funding through DOJ’s Smart Policing Initiative.²⁸ Prior to its assessment of the focused deterrence program in 2021, the Bureau of Justice Assistance issued a stop-work order to the Sheriff’s Office.²⁹

While these programs appear to have been discontinued, the Sheriff’s Office may, at any time, restart them or initiate new programs with similar operations and functions.

The At-Risk Youth Program

To create its list of children “destined to a life of crime,” the Sheriff’s Office employed a network of intelligence officers and School Resource Officers (SROs). In 2019, the Sheriff’s Office used federal funding to station a criminal intelligence analyst³⁰ in Pasco County public schools,³¹ who worked in collaboration with schools, law enforcement, mental health providers, and other stakeholders to implement research techniques to identify children who would ultimately be targeted by the program.³² Records from schools and child welfare agencies about children’s educational performance and childhood trauma were incorporated into the analysis.³³





Between August 2018 and December 2018, SROs made at least 219 contacts with students labeled “critical,” “off-track,” or “at-risk,” documented as Field Incident Reports in the Sheriff’s Record Management System (RMS)

Similarly, the Sheriff’s Office instructed SROs—who are also stationed within schools—to “identify students who are at-risk of developing into future prolific offenders.”³⁴ SROs were directed to routinely review the At-Risk Youth List, plan home visits for youth labeled “at risk,” issue truancy checks when a student labeled “at risk” was absent from school, and document “mentoring” and “counseling” meetings with students labeled “at risk,” enabling the Sheriff’s Office to better interpret the “criminal environment” within schools.³⁵ Between August 2018 and December 2018, SROs made **at least 219 contacts** with students labeled “critical,” “off-track,” or “at-risk,” documented as Field Incident Reports in the Sheriff’s Record Management System (RMS).³⁶

While the Sheriff’s Office claims that the At-Risk Youth Program was intended to provide “at-risk youth” with services (see Appendix), the ILP’s description of “at-risk youth”—as those who are “destined to a life of crime”—implies a prioritization of law enforcement as the primary objective. In fact, it is unclear if any meaningful services were ever rendered to youth placed on the At-Risk Youth List. As one young person impacted by the Sheriff’s Office’s predictive policing systems said, he was “never offered any kind of diversion program or support at school or home, only harassment and punishment.”³⁷ In fact, the Bureau of Justice Assistance commissioned a review of the Focused Deterrence Program in Pasco County and found that the Sheriff’s Office did not connect targeted residents to local services because the County substantially lacks the scale of social services necessary to meet community demand.³⁸ Additionally, in jurisdictions with similar predictive policing programs, such as Chicago’s Strategic Subjects List,³⁹ researchers found no evidence of

meaningful service provision to targeted individuals despite law enforcement’s claims.⁴⁰

Research shows that even when SROs are assigned tasks outside law enforcement’s traditional purview, such as counseling, they end up reinforcing racialized criminalization and punishment.⁴¹ This can be harmful to children, as increased contact with law enforcement can adversely impact the mental and physical health of Black and Latinx youth, harm students’ educational trajectories, and have criminogenic effects.⁴² Indeed, Field Incident Reports show that SROs interviewed targeted students at school through periodic check-ins, in which they would attempt to gather “intelligence” to map out a student’s familial and social networks and determine if they were connected with other targeted individuals.⁴³ In practice, it appears that SROs were, at least in part, using the At-Risk Youth List as a pretext to criminally investigate children and expand the scope of surveillance, rather than offer supportive services.

Pasco County is under-resourced in school counselors, social workers, school psychologists, and school nurses, yet the number of police officers increased from 31 officers in 2014-15 to 89 officers in 2018-19.⁴⁴ **Programs like the At-Risk Youth List risk digitizing the existing school-to-prison pipeline into a “cradle-to-prison algorithm.”**⁴⁵

In 2021, the People Against the Surveillance of Children and Overpolicing (P.A.S.C.O.) Coalition formed to advocate for the eradication of Pasco County’s predictive policing program.⁴⁶ Since then, the Coalition has repeatedly called attention to the harms of systematic police surveillance, the violation of student privacy rights, and the risk of discrimination due to biased data sources.⁴⁷

(left) Officer Joe Plazio, of the Fairfax County Police Department, patrols the hallways where he is stationed at West Springfield High School on Friday, January 18, 2012, in Springfield, VA. Each of the high schools and middle schools have a Fairfax County school resource officer, who is an armed sworn officer with the Fairfax County Police. Photo by Jahi Chikwendiu/The Washington Post via Getty Images

THE AT-RISK YOUTH PROGRAM: A CASE STUDY IN DIRTY DATA POLICING



The Pasco County Sheriff’s Office utilizes multiple, interconnected predictive policing programs that many residents experience as one surveillance system.⁴⁸ Nevertheless, this analysis focuses on the At-Risk Youth Program because it so clearly captures a number of intersecting issues that raise urgent concerns about modern policing: the use of “dirty data,” the hyper-surveillance of young people, and the collaboration between police and non-law enforcement entities (e.g., schools and child welfare agencies) to perpetuate a cycle of racially discriminatory criminalization, especially for Black youth.

What is “Dirty Data” Policing?

The Sheriff’s Office advertised the ILP as a “research-based” approach when, in actuality, the ILP contradicts current research on best-practices for building long-term public safety. Contrary to what the Sheriff’s Office asserts, no one is “destined to a life of crime.”⁴⁹ Moreover, there is relatively little empirical evidence that proactive policing is effective in creating long-term public safety,⁵⁰ in contrast to the considerable evidence that police surveillance and proactive policing increase the risk of Black and Brown people’s encounters with law enforcement, often leading to arrests, police violence, and harm to entire communities.⁵¹ Unsurprisingly, research has shown that exposing vulnerable youth to law enforcement officers can be counterproductive and even harmful.⁵²

One fundamental flaw of the ILP is the funneling of “dirty data” into its predictive policing system, which then amplifies the systemic racial biases embedded in the input data. “Dirty data” can refer to missing and incorrect data, information that has been corrupted or manipulated, or data that has been derived from practices that reflect individual or societal biases.⁵³ Dirty data policing perpetuates histories of racial and social disadvantage by creating feedback loops where historical patterns of biased policing are used to justify biased policing practices of the future. This is especially concerning given the history of systemic rights violations and

abuses directed at marginalized communities.⁵⁴ Data derived from unconstitutional, or otherwise unlawful, conduct should never be used to train, tune, test, or deploy algorithmic systems, especially in sensitive domains such as education and public safety.⁵⁵ Dirty data policing also raises additional concerns regarding interagency data-sharing—where designations based on dirty data are shared and amplified among various public agencies and private vendors, thus causing greater harms to targeted individuals.⁵⁶

As we describe below, the predictive policing practices of the Pasco County Sheriff’s Office represent a powerful example of what Princeton sociologist Ruha Benjamin calls the “New Jim Code”⁵⁷ in the context of public education.⁵⁸ Using data-driven design, the Sheriff’s Office reproduced and reinforced social hierarchies through algorithmic and statistical presumptions of risk, criminality, and identity that view and treat students—especially Black students and other students of color—in disparate, unequal, and unjust ways.

Building on the work of the *Tampa Bay Times* and the P.A.S.C.O. Coalition, this report compiles evidence demonstrating that the Sheriff’s Office relied on racially biased data to predict which schoolchildren are more likely to engage in future criminal activity.

CONTRARY TO WHAT THE SHERIFF’S OFFICE ASSERTS, NO ONE IS “DESTINED TO A LIFE OF CRIME.”

The Targets of the At-Risk Youth List

The Sheriff’s Office constructed its list of children to monitor by combining data from its own Records Management System (RMS)⁵⁹ with information from the Florida Department of Children and Families and the County School Board’s Early Warning System (EWS).⁶⁰ Neither families nor students were made aware of these practices or consented to the agencies’ disclosure of *student personal data to the Sheriff’s analysts*.

With this data, the Sheriff’s Office developed and utilized nine criteria to evaluate whether a young person was “destined to a life of crime.”⁶¹ The data and criteria are rife with inherent biases and inappropriate sources. The table below lists these criteria, using the Sheriff’s Office’s terminology:

Criterion	Category	Source
1. Off-Track Offenders	Criminogenic Risk Factors	Sheriff's Office's Records Management System (RMS) ⁶²
2. At-Risk Offenders		
3. Personal Victimitizations		
4. Lack of Supervision		
5. Drugs / Alcohol		
6. Mental Health Concerns		
7. Runaway		
8. ACE Score – based on factors including incarceration of household member, physical abuse, emotional abuse, witness to household violence, physical neglect, household substance abuse, and sexual abuse. ⁶³	Adverse Childhood Experiences (ACEs)	RMS, via a partnership between the Department of Children and Families’ Florida Safe Families Network and the Sheriff’s Office Child Protective Investigations Department ⁶⁴
9. EWS Overall Risk Indicator – based on factors including course performance, GPA, credits, attendance, office discipline referrals.	Educational Risk Factors	Pasco County School Board's Early Warning System (EWS)

FIGURE 1. Data from January 2020 At-Risk Youth List

School	Grade	Off Track Offender	At Risk Offender	Personal Victimization	Lack of Supervision	ACE Score	Drugs/Alcohol	Mental Illness	Runaways	EWS Overall Risk Indicator	Total ARY
Achieve Center of Pasco-2102 (XX)	11	6	17	4	9	11	2	7	15	Off-Track	71
Gulf High School 0331 (HS)	10	8	11	2	6	10	3	2	9	Off-Track	51
Hudson High School - 0521 (HS)	09	1	6	1	2	7	1	17	13	Off-Track	48
Raymond B Stewart Middle School - 0102 (MD)	08	0	5	0	8	6	0	11	16	Off-Track	46
Achieve Center of Pasco - 2102 (XX)	08	0	6	2	3	5	0	30	0	Off-Track	46
Center Pasco Girls Academy - 4081 (XX)	08	3	10	4	4	6	0	7	10	Off-Track	44
Sheriffs Detention Center - 5881 (XX)	08	2	13	0	4	4	1	6	14	Off-Track	44
Sheriffs Detention Center - 5881 (XX)	10	13	17	0	7	4	3	0	0	Off-Track	44
Achieve Center of Pasco - 2102 (XX)	11	1	12	1	3	14	1	2	8	Off-Track	42
James Irvin Education Center - 7071 (XX)	08	13	8	0	5	3	6	2	4	Off-Track	41
Achieve Center of Pasco - 2102 (XX)	10	1	11	0	2	13	0	11	0	Off-Track	38
James Irvin Education Center - 7071 (XX)	08	2	6	0	2	14	0	13	0	Off-Track	37

On file with the PASCO coalition.

The Sheriff’s Office used its own scoring thresholds to assign young people as “on-track,” “at-risk,” “off-track,” or “critical” depending on their history of prior arrests, while the School District uses its own risk scoring system for the Early Warning System (see Appendix).⁶⁵

To generate a total At-Risk Youth score for each child, the Sheriff’s Office added up the number of incidents across all criminogenic factors, added the child’s ACE score to that sum, and factored in the child’s overall score in the EWS. Young people who scored over 30 were classified as “critical,” those who scored between 16-30 were considered “off-

track,” those with scores between 6-15 were deemed “at-risk,” and those who scored 0-5 were considered “on-track.”

It is worth noting that terms such as “on-track,” “off-track,” “at risk,” and “critical” take on different meanings when they are used as part of the criminogenic risk factors, educational risk factors, and the overall At-Risk Youth score. In the criminogenic risk factors, these terms relate to a child’s exposure to arrests; in the educational risk factors, it refers to their academic and disciplinary performance; and the overall score is a combination of these factors along with a child’s ACE score.

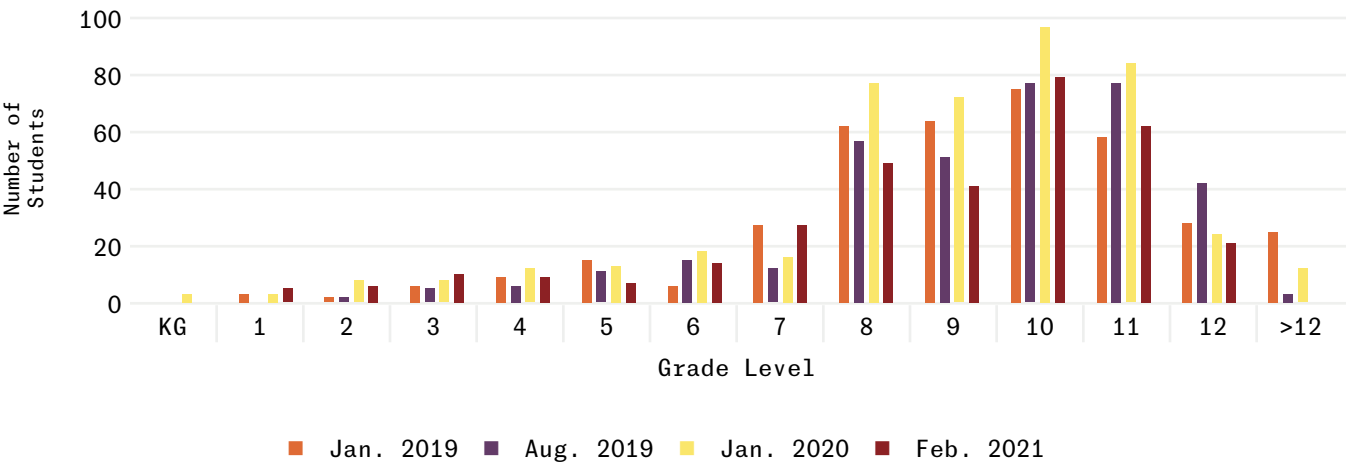
Number of Students in Each Risk Category

Date ⁶⁶	On-Track	At-Risk	Off-Track	Critical	Total
August 2018 ⁶⁷	13,990	1751	176	26	15,943
January 2019	15,225	326	50	12	15,613
August 2019	14,468	313	37	17	14,835
January 2020	16,836	420	54	17	17,327
February 2021	10,082	285	38	8	10,413

Grade Levels of Students Labeled At-Risk, Off-Track, or Critical.⁶⁸

Strikingly, the At-Risk Youth List includes children in kindergarten. On the At-Risk Youth List that dates to January 2020, three kindergartners were labeled “At-Risk,” and were flagged by the Sheriff’s Office for heightened scrutiny due to their ACE scores, histories of personal victimization, and/or mental illnesses. The Sheriff’s Office also flagged students labeled “critical” or “off-track” who were aging out of the school system in order “to identify juveniles who will have the highest likelihood of committing criminal acts as adults.”

FIGURE 2. Grade Level Breakdown of Students Labeled At-Risk, Off-Track, or Critical



Regardless of their actual involvement in criminal behavior, the use of dirty data to construct the At-Risk Youth List is inherently harmful. Being included in a predictive policing database exposes individuals to the risk of heightened suspicion and police contact regardless of their past, present, or future behavior. As sociologist Sarah Brayne has noted, “individuals are more likely—correctly or incorrectly—to be identified as suspicious” if they are included in police surveillance systems.⁶⁹

UNPACKING THE DIRTY DATA

In this section, we look at seven of the At-Risk Youth Program’s nine criteria for inclusion in the list, and we demonstrate how they are predisposed to biased or otherwise unjust outcomes because they incorporate dirty data.

Criminogenic Risk Factors

Contact with the Criminal Legal System

The At-Risk Youth List incorporates data about children’s contact with the criminal legal system to assess whether they are “destined to a life of future crime.” If a child appears in the Sheriff’s Record Management System (RMS) as having previously been arrested for offenses such as burglary, robbery, assault, or battery, they are designated as an “Off-Track Offender.” If they are listed in the RMS for any other offense, they are designated as an “At-Risk Offender.” A child is scored on the “Lack of Supervision” criterion based on the number of times they are listed as an offender in the RMS for a crime like violating probation or curfew or allowing minors to possess alcohol or drugs at a party they host.⁷⁰

These data inputs inherently have a disproportionate impact on Black Floridians. Police tend to conduct enforcement activity in predominantly Black communities at higher rates, both in Florida and around the country.⁷¹ As a result, Black children from these communities are bound to appear in the RMS at disproportionately higher rates simply by virtue of how police departments focus their resources. By designating people with increased law enforcement contact as a future criminal, the At-Risk Youth List perpetuates and reinforces these existing racial disparities in police practices.

- In 2020, Black people made up 13.6% of the total arrests in Pasco County, despite constituting only 7.7% of the total population.⁷²
- In FY 2017-18, Black youth ages 10-17 in Florida were nearly four times as likely to be arrested than white youth in the same age group.⁷³
- In 2019, Florida law enforcement officers made more than 1,400 youth arrests for “‘disorderly conduct,’ a charge so prone to bias” that Black youth are seven times more likely to be arrested for that offense.⁷⁴

Nationwide, Black people continue to be disproportionately represented in data measuring contact with the criminal legal system, due to systemic bias at every stage of the process.⁷⁵

Substance Use

The At-Risk Youth List also relies on information related to drug- and alcohol-related offenses, such as “possession of drug paraphernalia, any drug possession, intent to sell/distribute, allowing minors alcohol and drugs at party, etc.”⁷⁶ This, too, has a strong tendency to reinforce racial biases in policing. Throughout the War on Drugs and in the present day, Black people have been unjustly funneled into the criminal legal system on drug-related charges.⁷⁷

- In 2014, the *Sarasota Herald-Tribune* found that Black people in Florida were 4.2 times as likely to be arrested for marijuana possession than white people,⁷⁸ and a 2020 ACLU report found that Black people across the country were 3.6 times more likely to be arrested for marijuana possession than white people, despite similar usage rates across both groups.⁷⁹
- Another *Sarasota Herald-Tribune* investigation in 2016 revealed that college-aged Black people off-campus were nine times more likely to be arrested on drug-related charges, compared to white college students at the University of Florida. The investigative reporters concluded that local law enforcement was “targeting those with darker skin for petty infractions that ultimately spur a drug search. . . . The stop-and-search tactics produce at least one arrest every day – a constant pressure that has left the [B]lack neighborhood feeling persecuted and fatigued.”⁸⁰

Because of racially biased policing practices, Black people are more likely to appear in police record systems for substance use, even though they do not use or sell drugs at disproportionately high rates.⁸¹ As with other criminogenic factors, the inclusion of substance use as a risk factor on the At-Risk Youth List amplifies existing racial biases in law enforcement practices and widens the gap in officers’ disparate treatment of white and Black people for similar behavior.

Personal Victimitizations

The At-Risk Youth List scores children based on the number of times they were listed as a victim of a crime like assault or battery.⁸² The use of a child’s history of victimization to demonstrate that same child’s increased proclivity to be “destined to a future of crime” shocks the conscious. This is particularly alarming because Black youth and other children of color are disproportionately the

victims of certain types of crimes, particularly violent crime, resulting in their racially disparate criminalization by the Sheriff’s Office based on tragic circumstances.⁸³ Considering the anecdotal evidence that children on the At-Risk Youth List more often had law enforcement contact rather than connection to social services, this criterion is an alarming example of pathologizing and criminalizing Black children who are confronting enormous challenges due to the failures of multiple governmental systems.

Contact with Mental Health Services

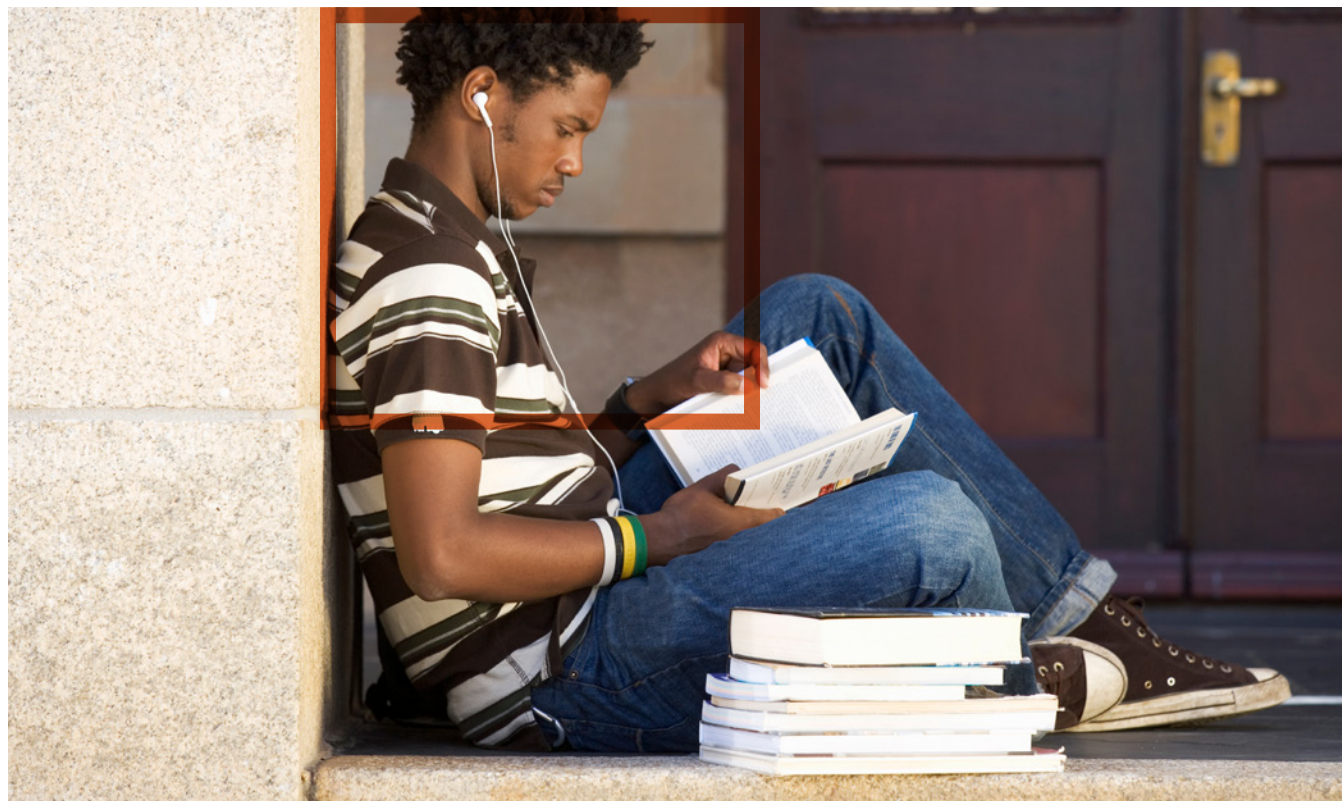
The At-Risk Youth List relies on a child’s interaction with mental health services to classify them as future criminals. In Florida, the Baker Act⁸⁴ and the Marchman Act⁸⁵ create mechanisms for schools, residential facilities, and police to subject children to involuntary arrest and/or psychiatric examination,⁸⁶ and these events were used as a criterion for the Sheriff’s At-Risk Youth List.⁸⁷ These invasive procedures have been criticized as a “behavioral management tool for far too many Florida classrooms, schools and residential foster care facilities. Children as young as 5 and 6 are handcuffed and forcibly taken by police to psychiatric hospitals, where they legally can be held for up to 72 business hours in conditions that would harm and traumatize even adults.”⁸⁸

During the 2018-19 fiscal year, 1,551 children in Pasco County underwent involuntary examinations under the Baker Act.⁸⁹ Across Florida, more than two-thirds of the involuntary examinations of children that year were initiated by law enforcement.⁹⁰ The Baker Act is “used disproportionately against children who already face systemic barriers, such as children with disabilities, those in foster care, and children of color.”⁹¹

In Pasco County, contact with mental health services may increase a child’s odds of receiving



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intensified police scrutiny, including through the At-Risk Youth program. For example, in June 2018, the Sheriff’s Office identified 24 children who were flagged as “Off-Track” in both the school district’s Early Warning System and the Sheriff’s Record Management System; one-third of those children had no previous arrests, but were recorded as having “documented mental illness.”⁹²

In March 2024, the Department of Justice’s (DOJ) Civil Rights Division reached a settlement agreement with the Pasco County School District after concluding that the district effectively discriminated against students with disabilities, in part through its use of threat assessments and law enforcement referrals.⁹³ By considering interactions with mental health services as a factor that contributes to inclusion in the At-Risk Youth List, the Sheriff’s Office effectively targets and criminalizes an already vulnerable population of young people with mental health conditions. This form of unfair criminalization can increase the likelihood of police encounters for young people with mental illness, which is not only unjust but also dangerous, as people with mental illness tend to experience higher rates of violence and even death at the hands of law enforcement.⁹⁴

“Runaway” Youth Status

The At-Risk Youth List targets youth with a history of running away from home—a criterion that also disproportionately impacts youth from marginalized communities.⁹⁵ LGBTQ+ youth are particularly vulnerable, as many run away to escape threats to their physical and emotional safety in their homes, while others are forced from their homes and onto the streets.⁹⁶ These factors lead to increased rates of homelessness for LGBTQ+ youth—between 20-40% of homeless youth in the U.S. identify as LGBTQ+,⁹⁷ compared to 7-10% of the overall youth population identifying as LGBTQ+.⁹⁸ Youth with multiple, intersectional identities are acutely

vulnerable to housing instability: A 2018 study found that 16% of youth (ages 18-25 in the study) who are Black and LGBTQ+ reported homelessness as compared to 8% of white and LGBTQ+ youth, and 4% of white and non-LGBTQ+ youth.⁹⁹

Thus, by incorporating “runaway” status into the At-Risk Youth List, the Sheriff’s Office again placed young people from marginalized and struggling communities in the crosshairs of police surveillance and undue criminalization.

Adverse Childhood Experiences

The At-Risk Youth List relies on sensitive information about a child’s home life and history of trauma to designate them as potential future offenders. The Sheriff’s Office checks if a child has been listed in its RMS as a victim of Adverse Childhood Experiences (ACEs), such as a history of physical abuse, neglect, sexual abuse, and domestic violence.¹⁰⁰ A child’s history of childhood trauma may significantly impact their likelihood of police surveillance: of the 24 children flagged by the Sheriff’s Office for being “off-track” by both the school district and the Sheriff’s Office in June 2018, each one had experienced childhood trauma, including 14 children with no prior arrests.¹⁰¹

Because Black families endure disproportionate contact with the child welfare system, the Sheriff’s reliance on ACE scores risks targeting Black children for inclusion in the At Risk Youth List. The Florida Safe Families Network documents child welfare cases “from the initial reporting of abuse and neglect, to foster care and adoptions case management and permanency planning.”¹⁰² Racial and socioeconomic disparities at each stage of this data collection are well-documented. In Florida in 2021, Black children made up 19.9% of the child population, but 29.1% of victims of child maltreatment¹⁰³ and 28.5% of children in foster care.¹⁰⁴ According to the American Bar Association:

“Over 50 percent of Black children in the U.S. will experience a child welfare investigation before their eighteenth birthday (nearly double the rate of white children). [9.1%] of Black children will be removed from their parents and placed into foster care (double the rate of white children). One in 41 Black children will have their relationship with their birth parent or parents legally terminated (more than double the rate of the general population).”¹⁰⁵

Racial and socioeconomic inequities critically shape these disparities in the child welfare system. Although ostensibly designed to identify and prevent child maltreatment, in practice, the child welfare system often criminalizes parents and guardians for structural problems rooted in poverty. For example, the category of parental neglect in current federal child welfare law often criminalizes families living in poverty, and this criminalization of poverty is racialized.¹⁰⁶ “In 2020 over 70 percent of all children . . . removed into the U.S. foster system were taken from their families for reasons related to ‘neglect.’”¹⁰⁷ By contrast, allegations of physical or sexual abuse only account for about 17% of children separated from their families and placed in foster care nationwide.¹⁰⁸ Research also demonstrates that mandatory reporters – among them medical professionals, school personnel, social workers, and law enforcement¹⁰⁹ – are more likely to screen and report Black families for child maltreatment compared to white families.¹¹⁰ Although rates of child abuse and neglect are equal across races, Black children are nine times more likely than white children to have their injuries reported by medical professionals as abuse.¹¹¹

ACE scores were designed to show how untreated trauma can cause people with adverse childhood experiences to have a higher risk of negative outcomes in the future, including adverse social outcomes (such as educational failure, absenteeism from school or work, and unemployment),

psychiatric and substance use disorders, health risk behaviors, and medical health problems.¹¹² Using the risk of these adverse social outcomes to inform a predictive policing program runs contrary to the very goals of ACE scores, as it further increases vulnerable young people’s likelihood of adverse outcomes through have harmful encounters with police, rather than decreasing that likelihood with helpful encounters with service providers. And like so many other aspects of the At-Risk Youth List, this criterion tends to reinforce structural racial inequities due to systemic failures in both social services and public safety systems for vulnerable Black youth.

Educational Risk Factors

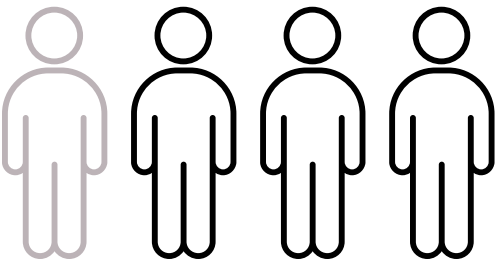
The School Board’s Early Warning System (EWS) incorporates information about a child’s academic performance, including their grades, disciplinary outcomes, and attendance, to place the child in a risk category. Yet again, this information reflects systemic biases. Racial inequity in the education system – due to intersecting racial disparities from school segregation, residential segregation, economic inequality, school disciplinary systems that punish Black students more harshly than white students for similar conduct,¹¹³ and the school-to-prison pipeline – has led to opportunity gaps for Black students.¹¹⁴

* In the 2017-18 school year, Black students made up 7.4% of the Pasco County School District’s overall student population, but they comprised 14.9% of students facing in-school suspensions, 14.4% of students facing out-of-school suspensions, 23% of students facing expulsion, 13.9% of students referred to law enforcement, and 18.5% of students who experienced school-related arrests.¹¹⁵

**NATIONWIDE,
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3X

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- Across the country, the school-to-prison pipeline disproportionately targets Black students, increasing their risk of falling behind academically and being funneled into the criminal legal system. Nationwide, “Black students are more than three times as likely to be suspended or expelled from school compared to white students, even after controlling for socioeconomic status and alleged misbehavior.”¹¹⁶
- Students with disabilities are also disproportionately targeted in the school-to-prison pipeline, and these effects are exacerbated at the intersection of race and disability. In 2017-18, students with disabilities represented 17.7% of the overall student population in the Pasco County School District, but they comprised 34.3% of students facing out-of-school suspensions and 27.6% of students facing in-school suspensions.¹¹⁷ That same year, Black students represented 7.5% of students with disabilities, but they comprised 14.7% of students with disabilities facing out-of-school suspensions, 15.8% of students with disabilities facing in-school suspensions, and 14.1% of students with disabilities referred to law enforcement.¹¹⁸

EWS data obtained by the P.A.S.C.O. Coalition through public records requests indicate that all demographic groups had elevated rates of students labeled “at-risk” or “off-track” by the school district in 2018. Yet Black, Latinx, and American Indian or Alaskan Native students had the highest shares of those labeled at-risk or off-track. Approximately 83% of students in these groups were labeled at-risk or off-track on EWS in 2018, compared to 78% of white students, 56% of Asian or Pacific Islander students, and 80% of students labeled “Multiracial / Other.”¹¹⁹

CONCLUSION



The Pasco County Sheriff’s Office’s At-Risk Youth Program created and utilized a list of potential offenders based on inherently biased criteria. Children from marginalized communities – particularly Black, Brown, and LGBTQ+ children – are already subjected to harsher outcomes and heightened scrutiny in our criminal legal, educational, and child welfare systems. By recycling historically biased input data that disadvantages these children, the At-Risk Youth List perpetuates a cycle of injustice. Further, by singling out certain students whom it considers “destined to a life of crime” for heightened surveillance and police contact, the Sheriff’s Office increases the risk that Black, Brown, and LGBTQ+ children will experience acute stress, trauma, and potentially harmful law enforcement interactions that can lead to incarceration, involuntary commitment, or physical harm. Such policing has no place in our schools and communities, and should not receive the support of our federal government or the larger law enforcement community.

Instead, resources are better spent towards youth-oriented services that actually improve health, safety, and educational outcomes for Pasco County’s children. This includes shifting the understanding of school safety away from policing and toward practices like restorative justice, which promote long-term security and the emotional and social development of children without subjecting them to the deleterious effects of exclusionary school discipline, arrest, or incarceration. Further, to counteract the systemic and generational injustices that have disadvantaged marginalized children, material investments should be made in evidence-informed programs that increase access to food, health services, and economic opportunity for children and families. By moving toward a paradigm of opportunity and supportive services, all children will be better situated for a future of health, wellness and safety.

RECOMMENDATIONS

Pasco County’s At-Risk Youth Program is part of a disconcerting, nationwide trend of federal funds supporting predictive policing systems and expanding school surveillance technologies that threaten to digitize the school-to-prison pipeline for students of color and other marginalized youth. To address these troubling developments, federal, state, and local decision makers should implement the following recommendations to protect the most vulnerable youth and prevent criminalization that will create long lasting harms.

Eliminate federal funding for predictive policing. The At-Risk Youth Program, the Prolific Offender Program, and Focused Deterrence Program all received federal grants from the Department of Justice (DOJ).¹²⁰ And Pasco County is not alone. DOJ’s National Institute of Justice has spent \$10 million on predictive policing projects since 2009, and since 2005 the Bureau of Justice Assistance has funneled at least \$24 million to state, local, and tribal law enforcement agencies to fund police surveillance technologies.¹²¹ Despite the inherent risk that these technologies pose for Black and Brown people and other marginalized communities, DOJ “did not do basic risk assessment or racial justice evaluations before investing” in these technologies.¹²² Members of Congress expressed concern in a January 2024 letter to DOJ, urging DOJ to halt all grants for predictive policing programs until it can thoroughly investigate whether such grants are used for discriminatory technologies.¹²³ In light of existing evidence of biases embedded in predictive policing programs, DOJ should cease all funding to predictive policing programs at the local, state, tribal and federal levels, because of the clear risk that these programs and technologies pose, particularly for communities of color and other marginalized groups.

Prohibit the use of school-based police surveillance technologies. School surveillance technologies across the country are increasingly being pushed forward as school safety “solutions,” but risk funneling marginalized youth into a digital school-to-prison pipeline.¹²⁴ In a 2023 study of technologies in middle and high schools,¹²⁵ 38 percent of teachers reported that their schools share student data like grades, attendance, and discipline information with law enforcement. This percentage was higher for teachers in Title I schools (48 percent), which receive federal funding to serve students from low-income families, and for licensed special education teachers (57 percent). The study also found that 36 percent of teachers reported their schools use technology to analyze student data to predict which individual students would be more likely to commit a crime, an act of violence, or an act of self-harm. Again, this percentage was higher for teachers in Title I schools (45 percent) and for licensed special education teachers (55 percent).¹²⁶ Research shows that heightened school surveillance can subject students to more suspensions,¹²⁷ worse academic outcomes,¹²⁸ and increased contact with law enforcement¹²⁹ – consequences that are disproportionately experienced by students who are Black, identify as LGBTQ+, and/or have disabilities.¹³⁰

Police surveillance technologies have become a commonplace feature of public schools. Surveillance technologies ranging from predictive policing and facial recognition to affect recognition and AI vape sensors are present in thousands of school districts across the United States.¹³¹ The adoption of these technologies in schools can be at odds with students’ rights under civil rights and privacy laws.¹³² Thus, federal agency actions—like those listed below, which the NOTICE Coalition¹³³ requested in a March 2024 letter to the Department of Education¹³⁴—are urgently needed to ensure the rights of all students, but especially vulnerable and marginalized students, during the current digital age:

- “Banning the use of federal grants to procure or otherwise use police surveillance technologies in public schools;
- “Divesting all discretionary agency appropriations from funding police surveillance technologies in schools;
- “Issuing technical guidance and offering technical assistance to support school districts in conducting and disclosing algorithmic impact assessments and audits to determine scientific validation and legal compliance of AI and big data technologies that implicate students’ fundamental rights and/or may disparately harm students due to preexisting biases embedded in training datasets;
- “Studying the prevalence of police surveillance and other high-risk algorithmic technologies in public schools;
- “Prioritizing enforcement actions against algorithmic discrimination alongside other unethical and unlawful uses of AI and other data-driven technologies in public schools; and,
- “Centering the leadership and vision of youth and young adults alongside caregivers, people with disabilities, and other marginalized groups and community-based organizations in AI and data privacy governance.”

Shift the paradigm from policing to Restorative Justice and supportive services. Mitigating the risks of school surveillance technology must take place in tandem with building out restorative justice models of school safety, which aim to “repair harm while preventing further harm through accountability and support.”¹³⁵ Available evidence suggests that restorative justice programs can improve student perceptions of school climate, reduce instances of harmful behavior, and decrease reliance on exclusionary discipline.¹³⁶ Additionally, we recommend:

- Police-free schools (including School Resource Officers) and reductions in the use of punitive and exclusionary school discipline;¹³⁷
- Material investments in home and school resources through approaches like multigenerational policy design and expanded investments in evidence-informed, public benefits and antipoverty programs, such as the expanded Child Tax Credit, the Supplemental Nutrition Assistance program (SNAP), the School Lunch and Summer Nutrition Programs, the School Meals Program, Medicaid, the Workforce Innovation Opportunity Act (WIOA) and postsecondary assistance programs such as Pell Grants;
- Increased mental and behavioral health supports and services in schools through strategies like school-based youth mobile crisis response teams¹³⁸ and peer support models;¹³⁹
- Training and education for educators and other school staff to be trauma-informed and culturally responsive; and
- Hiring diverse school staff, including Black educators.

APPENDIX

1) Evolution of the Sheriff’s Office’s description of the At-Risk Youth List

Between August and October 2020, the Sheriff’s Office changed the language they used to describe SRO involvement in the At-Risk Youth Program.¹⁴⁰ Public records obtained by the P.A.S.C.O. Coalition show that between August and October 2020, the Sheriff’s Office removed language about predicting the future criminality of youth from their At-Risk Youth documents and began asserting that SROs’ objectives were “meaningful youth engagement” and “counseling” rather than “crime prevention”:

August 2020 and Earlier ¹⁴¹	October 2020 and Later ¹⁴²
“Data was obtained from the Pasco Sheriff’s Office Report Management System and the Pasco County School Board’s Early Warning System (EWS) in relation to juveniles who could be at-risk of developing into offenders of crime or victims of crime and who currently live and/or are enrolled in Pasco County.”	“Meaningful youth engagement can lead to and support positive outcomes for young people. All student populations benefit from trust building, mentoring, and counseling. SROs are encouraged to build positive relationships with all students and staff through a variety of means. Student populations are vast, diverse, and continue to grow.”
“This list of juveniles will serve as a guide for what students SRO’s need to identify as a potential offender or threat to their school.”	“SROs should prioritize and seek engagement opportunities with students who may be at-risk or off-track.”
“For this analysis, 16 juveniles were identified as having a Critical Score of 31 or more. These juveniles are those individuals who pose the greatest risk to themselves and others.”	“For this analysis, 14 juveniles were identified as having a Critical Score of 31 or more. The 14 juveniles are those with the greatest potential of being at-risk to themselves or others and warrant the highest level of engagement by the SROs.”
“The 16 critical juveniles currently need the most intervention. If these juveniles are in school, resources from both the School Board and the SRO’s, need to be utilized to prevent future crime from occurring. The 29 students that are off-track need to be monitored by SRO’s, school officials, and the ILP juvenile analyst. The 368 students that are at-risk pose the greatest threat to potential acts of crime and they too should be monitored for behaviors that could potential[ly] lead to acts of crime.”	“The 14 critical juveniles currently need the most intervention. If these juveniles are in school, resources from both the School Board and SRO’s should be utilized to promote meaningful youth engagement, create trust building, mentoring, and counseling opportunities. The SRO should prioritize these students that are deemed critically at-risk. The 32 off-track students should be included in school wide prevention strategies, positive behavior intervention, supports, counseling, and tutoring as appropriate.”
“The juveniles that are about to leave the school system need to be monitored. Based on their criminal history’s as juveniles, it is likely they will continue to commit crime into adulthood. A monitoring system and criteria should be in place so that these juveniles do not fall off of the radar upon graduation or drop-out from school.”	“These juveniles [who are about to age-out of the school system] should be monitored and provided resources while in school and connected with resources upon leaving the school system.”

Regardless of whether this change in language actually represented a change in practice, law enforcement should not be the conduit for providing important social services to children, and our concerns about the At-Risk Youth program remain.

2) Pasco County Sheriff’s Office’s Method for Scoring Children as “On-track,” “At-risk,” “Off-track,” or “Critical.”

The Sheriff’s Office used the below thresholds to assign students one of four risk labels in each category of data from its Record Management System RMS: on-track, at-risk, off-track, and critical.

Data	Risk Thresholds			
	On-track	At-Risk	Off-Track	Critical
Off-track offenders	>0 offenses ^A			
At-risk offenders	>0 offenses ^B			
Personal victimizations		0	1–2	>2
Lack of supervision	0–2	3–4	>4 ^C	
Drugs / Alcohol	0	1	>2 ^D	
Mental health concerns	0	1–2	3–4	>4
Runaway	0–1	2–3	>3 ^E	
ACE Score	0	1–3	4–5	>5
ACE Score >5: critical;				
EWS Overall Risk Indicator				
Course performance	≥ C’s	≥ D’s	≥ F’s	
Credits	meets credits	1 behind	2 behind	
Attendance	0-2 absences	2-4 absences	5+ absences	
Office discipline referrals	0	1	2	
GPA	2.5+	2.0–2.49	<2.0	

A such as burglary, robbery, assault or battery
B not considered off-track
C offenses such as violation of probation, curfew violation, or allowing minors alcohol and drugs at a party
D offenses such as “possession of drug paraphernalia, any drug possession, intent to sell/distribute, allowing minors alcohol and drugs at party, etc.”
E instances of being listed as a runaway or missing juvenile

3) Pasco County School District’s Method for Scoring Children as “On-track,” “At-risk,” “Off-track,” or “Critical.”

The Pasco County School District uses the below factors to assign students one of four risk labels in its Early Warning System (EWS): on-track, at-risk, off-track, and critical. A child is designated as “On Track,” “At Risk,” or “Off-Track” in each of the five categories. Their overall score matches the worst score they have received in any category, and they are marked critical if they have received “Off-Track” in every category.

Data	Risk Thresholds			
	On-track	At-Risk	Off-Track	Critical
Course performance	≥ C's	≥ D's	≥ F's	
GPA	2.5+	2.0–2.49	<2.0	
Credits	meets credits	1 behind	2 behind	
Attendance	0-2 absences, or under 5% in a year	3–4 absences, or 5–9% in a year	5+ absences, or ≥10% in a year	
Office Discipline Referrals in a quarter	0, or 0–2 in a year	1, or 3 in a year	2, >2 in a semester, or ≥in year	
Overall Score	Matches the worst score they have received in any category, except that they are marked “Critical” if they have received “Off-Track” in every category.			



Endnotes

1 We use the term “predictive policing” in a manner consistent with the Brennan Center’s definition: “Predictive policing uses computer systems to analyze large sets of data, including historical crime data, to help decide where to deploy police or to identify individuals who are purportedly more likely to commit or be a victim of a crime.” Tim Lau, *Predictive Policing Explained*, Brennan Center for Justice (Apr. 1, 2020), <https://www.brennancenter.org/our-work/research-reports/predictive-policing-explained>.

2 Neil Bedi & Kathleen McGrory, *Targeted*, *A Tampa Bay Times Investigation*, Tampa Bay Times (2020), <https://projects.tampabay.com/projects/2020/investigations/police-pasco-sheriff-targeted/school-data/>.

3 The P.A.S.C.O. Coalition describes itself as a collection of “over 90 individual members and over 30 local, state, and national organizational members working together to end the Pasco Sheriff’s Office predictive policing program.” <https://www.splcenter.org/PASCOcoalition>.

4 We have access to the At-Risk Youth Lists, obtained through public records requests, from August 2018, January 2019, August 2019, January 2020, and February 2021. The numbers in this first finding are derived from the latter four spreadsheets; the August 2018 spreadsheet was not included here since the Sheriff’s Office made some changes to their algorithm between August 2018 and January 2019.

5 Nat’l Acads. of Sci., Eng’g, & Med., *Proactive Policing: Effects on Crime and Communities* (The Nat’l Acads Press, 2018), <https://doi.org/10.17226/24928>; Sarah Brayne, *Big Data Surveillance: The Case of Policing*. 82 Am. Socio. Rev. 977–1008 (2017), <https://doi.org/10.1177/0003122417725865>.

6 See generally Bedi & McGrory, *supra* note 2.

7 Brayne, *supra* note 5, at 981.

8 *Id.* at 979–80, 985–86.

9 Kathleen McGrory & Neil Bedi, *Targeted*, Tampa Bay Times, <https://projects.tampabay.com/projects/2020/investigations/police-pasco-sheriff-targeted/> (last visited June 17, 2024); Kathleen McGrory & Neil Bedi, *Pasco’s sheriff created a futuristic program to stop crime before it happens. It monitors and harasses families*, *Tampa Bay Times* (Sept. 3, 2020) [hereinafter *Pasco’s Sheriff’s Futuristic Program*], <https://projects.tampabay.com/projects/2020/investigations/police-pasco-sheriff-targeted/intelligence-led-policing/>.

10 McGrory & Bedi, *Pasco’s Sheriff’s Futuristic Program*, *supra* note 9; Pasco Cnty. Sheriff’s Off., *Innovations* 15 (July 2022) [hereinafter *Innovations*], <https://www.pascosheriff.com/wp-content/uploads/2022/07/Innovations-Documents-FINALv5.pdf>.

11 Pasco Cnty. Sheriff’s Off., *Innovations*, *supra* note 10, at 12.

12 Benajmin Carleton, Brittany Cunningham & Zoë Thorkildsen, *The Use of Predictive Analytics in Policing*. CNA & Bureau Just. 3 (2020), <https://apps.dtic.mil/sti/trecms/pdf/AD1145696.pdf> (defining person-based predictive policing as “approaches [that] identify offenders, perpetrators, and groups or individuals most at risk of committing crimes or becoming victims of crimes.”); see McGrory & Bedi, *Pasco’s Sheriff’s Futuristic Program*, *supra* note 9.

13 Based on statements made by the Pasco County Sheriff’s Office, it is presently unclear whether the At-Risk Youth program and the Prolific Offender program are still in operation, although there is no certainty as to whether or not similar ILP programs are still in operation. This report refers to the At-Risk Youth Program in the past tense, under the assumption of its termination.

14 Person-based predictive policing uses data to identify specific individuals that are allegedly more likely to commit crimes in the future. By contrast, place-based predictive policing uses data to identify locations and times that are allegedly more likely to experience future crime. While we list the Pasco Sheriff’s Office’s person-based policing programs, additional programs under its Intelligence-Led policing program include the STAR box, a place-based predictive policing program that was “developed using crime statistics to help identify [the] area within our district that is experiencing consistent, heightened [crime].” STAR Manual, pp.1, Pasco County Sheriff’s Office (July 2015) (on file with the P.A.S.C.O. Coalition).

15 Neil Bedi & Kathleen McGrory, *Pasco’s sheriff uses grades and abuse histories to label schoolchildren potential criminals. The kids and their parents don’t know*, Tampa Bay Times (Nov. 19, 2020), <https://projects.tampabay.com/projects/2020/investigations/police-pasco-sheriff-targeted/school-data/>; Pasco Sheriff’s Off., *Intelligence-Led Policing Manual* 13 (Jan. 2018) [hereinafter *2018 ILPM*], https://www.documentcloud.org/documents/20412738-ilp_manual012918 (“Identifying at-risk youth who are destined to a life of crime and engaging them to prevent them from developing into prolific offenders also has significant crime prevention potential.”).

16 Pasco Sheriff’s Off., *2018 ILPM*, *supra* note 15, at 13.

17 Elizabeth J. Davis, *School Resource Officers, 2019-2020*, Bureau of Just. Stat. (NCJ 307334) (Nov. 2023), <https://bjs.ojp.gov/document/sro1920.pdf> (A School Resource Officer (SRO) is a “sworn law-enforcement officer with arrest powers who works, either full or part time, in a school setting.” According to the Bureau of Justice Statistics, “[a]lmost 100% of sworn SROs usually carried a firearm when working in their primarily assigned school during the 2019-2020 school year.”).

18 Pasco Sheriff’s Off., *2018 ILPM*, *supra* note 15, at 65–66.

19 DOJ Grant to District School Board of Pasco County (Block Grant FAIN: 2018YSBX0034), USASpending.gov, https://www.usaspending.gov/award/ASST_NON_2018YSBX0034_1550 (last visited June 18, 2024); see also *Student, Teachers, and Officers Preventing (STOP) School Violence Program – Overview*, Bureau of Just. Assistance, <https://bja.ojp.gov/program/stop-school-violence-program/overview> (last modified Oct. 20, 2022); Letter from P.A.S.C.O. Coalition, to Kharlton Moore, Bureau Just. Assistance, Director et al., 4 (Sept. 12, 2023) [hereinafter P.A.S.C.O. Coalition Sept 2023 Letter], <https://www.splcenter.org/sites/default/files/pasco-letter-doj-9-12-2023.pdf>.

20 Pasco Sheriff’s Off., *2018 ILPM*, *supra* note 15, at 75.

21 McGrory & Bedi, *Pasco’s Sheriff’s Futuristic Program*, *supra* note 9.

22 *Id.*

23 See DOJ Grant to Pasco County Sheriff’s Office (Project Grant FAIN: 2018WYBX0004), USASpending.gov, https://www.usaspending.gov/award/ASST_NON_2018WYBX0004_1550; see also *Pasco County, Florida, Smart Policing Initiative*, <https://www.smart-policing.com/spi-sites/pasco-county-florida-2018> (last visited June 20, 2024); P.A.S.C.O. Coalition Sept 2023 Letter, *supra* note 19, at 4.

24 Dan Sullivan, *Judge questions if Pasco deputies have stopped controversial policing tactics*, Tampa Bay Times (Apr. 6, 2024), <https://www.tampabay.com/news/pasco/2024/04/03/pasco-county-sheriffs-office-arrests-targeted-chris-nocco/>.

25 Travis Taniguchi & Katherine Hoogesteyn, *An Assessment of the Pasco County Sheriff's Office's Focused Deterrence Strategy*, Nat'l Policing Inst. (Sept. 13, 2022), <https://www.splcenter.org/sites/default/files/report-assessment-pasco-county-sheriffs-focused-deterrence.pdf>. Note: The Bureau of Justice Assistance report viewed the Focused Deterrence program as separate from the ILP, although there were many similarities between the Focused Deterrence and Prolific Offender systems.

26 Kathleen McGrory, *Pasco Sheriff's Office letter targets residents for 'increased accountability'*, Tampa Bay Times (July 24, 2021), <https://www.tampabay.com/investigations/2021/07/24/pasco-sheriffs-office-letter-targets-residents-for-increased-accountability/>.

27 See generally Bedi & McGrory, *supra* note 2; Taniguchi & Hoogesteyn, *supra* note 25, at 14–15.

28 See sources cited *supra* note 23.

29 See, e.g., Letter from Kristen Mahoney, Acting Director, Bureau of Just. Assistance, U.S. Dep't. of Just., to Chris Nocco, Sheriff, Pasco Cnty. Sheriff's Off. (Aug. 6, 2021), <https://s3.documentcloud.org/documents/21060774/bja-letter-to-sheriff-chris-nocco-pcso.pdf>.

30 The different documents on file with the P.A.S.C.O. Coalition use slightly different names for this position, but we use “criminal intelligence analyst” for the purposes of this report.

31 STOP School Violence Technology and Threat Assessment Solutions for Safer Schools Program Subrecipient Funding Agreement, p. 2 (on file with the P.A.S.C.O. Coalition).

32 Criminal Intelligence Analyst Job Description, p. 2, Pasco County Sheriff's Office (on file with the P.A.S.C.O. Coalition); FY 2019 STOP School Violence Technology and Threat Assessment Solutions for Safer Schools Program, Program Narrative, p. 6 (on file with the P.A.S.C.O. Coalition).

33 FY 2019 STOP School Violence Technology and Threat Assessment Solutions for Safer Schools Program, Program Narrative, p. 6 (on file with the P.A.S.C.O. Coalition).

34 Pasco Sheriff's Off., *2018 ILPM*, *supra* note 15, at 65–66.

35 *Id.*

36 P.A.S.C.O. Coalition, “At-Risk Juveniles Update 2018.” (on file with the PASCO Coalition).

37 Olivia Solon & Cyrus Farivar, *Predictive policing strategies for children face pushback*, NBC News (June 6, 2021, 6:00 AM EDT), <https://www.nbcnews.com/tech/tech-news/predictive-policing-strategies-children-face-pushback-n1269674>.

38 Taniguchi & Hoogesteyn, *supra* note 25, at 4, 34.

39 *Strategic Subject List – Historical*, City of Chic. Data Portal, https://data.cityofchicago.org/Public-Safety/Strategic-Subject-List-Historical/4aki-r3np/data_preview.

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62 In the Sheriff’s Office’s 2018 ILP manual, one of the performance expectations for intelligence collection across ILP programs is to “[d]ocument as much information as possible into RMS during arrest and booking.” Pasco Sheriff’s Off., *2018 ILPM*, *supra* note 15, at 48.

63 *Id.* at 72.

64 *Id.*

65 *Id.* In addition to the Child Protective Investigations (CPI) Department funneling ACE data from the Department of Children and Families’ Florida Safe Families Network into the At-Risk Youth Program, CPI supervisors were also “given the At-Risk Youth document to disseminate to their staff for intelligence and reporting purposes.” Pasco Sheriff’s Off., *At Risk Juveniles Update 2018* (SB18-556) (Dec. 2018) [hereinafter “Pasco Sheriff’s Office Dec 2018 Update”] (on file with the P.A.S.C.O. Coalition).

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68 The August 2018 At-Risk Youth spreadsheet (on file with the P.A.S.C.O. Coalition) does not have data on students’ grade levels. Also, due to unclear grade level data, students affiliated with “Pasco Home Education” were excluded from this grade level breakdown of students labeled at-risk, off-track, or critical – 9 students in August 2019 (on file with the P.A.S.C.O. Coalition) and 44 in January 2020 (on file with the P.A.S.C.O. Coalition). Age of onset and total number of arrests/offenses were removed as criteria starting October 2018. Previously, the criteria were allowing for “the double reporting of juvenile[-]involved incidents,” so this change “lowered the overall score of the juveniles and created a more meaningful interpretation [of] those involved.” Pasco Sheriff’s Office Dec 2018 Update, *supra* note 65, at 7; SPLC Analysis, *supra* note 67.

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70 Pasco Sheriff’s Office Feb 2021 Report, *supra* note 61, at 3.

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