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## The School to Prison Pipeline: The Role of Culture and Discipline in School

Can PBIS Build Justice Rather Than Merely Restore Order?

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# CHAPTER 7

## CAN PBIS BUILD JUSTICE RATHER THAN MERELY RESTORE ORDER?

Joshua Bornstein

### ABSTRACT

*In a multicase qualitative study, inclusive school leaders attempted to move their schools from the excessive use of suspension; they employed positive behavioral intervention and support (PBIS) as an alternative they thought would be therapeutic rather than punitive. However, the PBIS system traded a disciplinary system of control for a medicalized system of restoring order. Unwanted behavior came to be defined as evidence of possible behavioral disability. Hence, the PBIS system exchanged one deficit identity of “disorderly” student for another of “disordered” student, subsuming other considerations of race, class, and gender identity. Following the study’s findings, this chapter proposes more liberatory practices for PBIS that interrupt dominant culture discourses of normal behavior and power, and hold promise for establishing justice, rather than simply reinstating order.*

**Keywords:** PBIS; deficit identity; ableism; critical disability studies

Disrupting the school-to-prison pipeline will be significantly influenced by the way that school leaders encourage their schools to adopt new practices and systems for dealing with unwanted behavior and even to reconceptualize

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the issue. Ideally, we want to build justice in our schools, rather than simply restore order. We know from research that a hallmark of such inclusive efforts must be stopping the excessive use of school push-out and suspension to deal with unwanted behavior (Kim, Losen, & Hewitt, 2010; Skiba et al., 2003). If we conceive of the project as a social justice effort to build inclusive schools, then we know from the literature that successful leaders envision a place for all students with respect to race, class, disability, sexual orientation, gender identity, and language fluency (Marshall & Oliva, 2006; Ross & Berger, 2009; Shields, 2010; Theoharis, 2009; Vilbert & Portelli, 2000). Positive behavioral interventions and support (PBIS) has been indicated as one of the hopeful possible systems to disrupt excessive suspension (Netzel & Eber, 2003; Vincent & Tobin, 2010).

However, a recent study of inclusive school leaders in five diverse school districts (Bornstein, 2014) indicates that PBIS has its own pitfalls. Although the five school districts varied by size, race, and economics, two dynamics were consistent. First as they implemented PBIS, they fundamentally used it to restore disruptive students to compliance. Thus, PBIS became another mechanism for enforcing order. Second, when intervention efforts failed to achieve compliance, the educators involved with PBIS came to treat the students as potentially having emotional behavioral disorder, even if they lacked the clinical authority to make a diagnosis themselves. Consequently, students who were formerly regarded as disorderly increasingly came to be regarded as disordered.

These outcomes were the ramifications of structural imperatives of PBIS, not simply the results of misguided attempts by a select group of individuals. Qualitative research can illuminate the complexity and contradictions of systems like PBIS as they are lived (Bogdan & Biklen, 2007) as opposed to how they are intended to work in theory. Indeed, programs rarely work as logically and beneficently as intended.

With that caveat in mind, this chapter summarizes the earlier study (Bornstein, 2014) as a cautionary tale to leaders who choose PBIS as the alternative to excessive and disproportionate discipline. In his final book, *Where Do We Go from Here: Chaos or Community?* King (1968, 2010) argued for the likely necessity of social welfare programs as a measure of progress in the Civil Rights Movement, “but not for use as supplicants” he cautioned: “We require programs to hold up to our followers which mirror their aspirations” (King, 1968, 2010, p. 145). Likewise, we can acknowledge that social justice for students requires significant programmatic change to disrupt the school-to-prison pipeline, and that PBIS may be an attractive option. However, it would be hard to imagine that students would prefer

to be regarded as possibly having an emotional or behavioral disorder rather than delinquent. Students aspire to belong to a community that embraces them, rather than holds them at arms' length.

Truly dismantling the school-to-prison pipeline requires leaders who will build schools with core ethics, policies, and practices that build King's beloved community. Thus, the study presented here may be read as an admonition about making too facile a move from one system of disciplinary control to another medicalized one. Best practices are offered that may well enhance the promise of PBIS and have a better chance of establishing justice in our schools, rather than merely reimposing order.

## CONCEPTUAL FRAMEWORK

This study attempted to understand the actions of leaders by examining power as it was encoded in policy, implemented in systems, and enacted in decision-making practices. As such, it relied on Foucauldian discourse analysis (Baker & Heyning, 2004; Hall, 2001; Jones & Ball, 1995) to unpack the interplay of knowledge and power. In particular, this discourse analysis helped to identify how schools constructed deficit identities for students who showed unwanted behavior and who may thus have been regarded as emotionally disabled (Harwood, 2006) and impossible to include (Youdell, 2006). Furthermore, it relied on an emerging area of analysis known as DisCrit Theory (Annamma, Connor, & Ferri, 2013) that applies both critical race theory and disability studies in education to understand the complex interactions of whiteness and ableism in school systems.

### *Difference Interpreted as Deviance and as Possible Disability*

Disability studies is a powerful framework for understanding how difference can be cast as deviance, which can in turn be cast as disability when institutions analyze individuals in putatively scientific systems. Conrad and Schneider (1992) described this dynamic between families, schools, and medical professionals, creating a discourse that regarded energetic children as hyperactive. Informal and formal diagnoses of attention deficit hyperactivity disorder (ADHD) were powerfully framed by the schools' inability to accommodate active learning. This became a switch from "badness to sickness" (Conrad & Schneider, 1992).

Deficit identities are constructed by comparison to what is considered acceptable or normal. Since so much of the PBIS system is about comparing students' behavior to normative behavior standards, it is instructive to take Davis' (2006) point that

To understand the disabled body, one must return to the concept of the norm, the normal body. So much of writing about disability has focused on the disabled person as the object of study. Just as the study of race has focused on the person of color. But as with recent scholarship on race, which has turned its attention to whiteness, I would like to focus not so much on the construction of disability as on the construction of normalcy. I do this because the "problem" is not the person with disabilities; the problem is the way that normalcy is constructed to create the "problem" of the disabled person. (Davis, 2006, p. 3)

Broderick and Leonardo (2016) extended and complicated this analysis with DisCrit theory by understanding that school's codes of conduct institutionalize White behavioral patterns as the basic definition of acceptable and normal conduct. This analysis build on similar work from Ferri (2012) and Artiles (2007) regarding response to intervention's (RTI) reliance on White norms for acceptable academic performance. With that baseline established, school systems such as child study and intervention teams examine learning styles and behaviors that deviate from the norm. Brantlinger (2006) encapsulated the dynamic elegantly when she described efforts to fix students who measure up as deficient by established school standards. She took on both meanings of the word "fix" (1) to remedy purported deficits and (2) to "determine a place for certain individuals such as through classification or other specialized classroom arrangements" (Brantlinger, 2006, p. viii). Hence, these efforts operate within systems whose goal is to return all students to normalcy and which do so by placing them in some form of classification scheme, such as the PBIS pyramid.

Thomas and Glenny (2000) argued that when schools characterize students as needing emotional and psychological therapy, this can often be a diversion that is fundamentally about the schools' exercise of disciplinary power over students. Qualitative research has borne this out with respect to specific diagnoses such as ADHD (Conrad, 1988, 2006) and conduct disorder (Harwood, 2006), noting that psychopathologizing of students brought them in line as purposefully as did explicit school discipline. Compliance through clinical intervention was thereby more prevalent and preferred to the alternative of creating classrooms and schools that accepted a broad range of student behaviors (Danforth & Smith, 2005; Smith, Danforth, & Nice, 2005).

Two senses of disorder have figured prominently in these discourses that prioritize compliance: disorder-as-organizational-turmoil and disorder-as-illness. In the first sense of disorder, students who routinely, dramatically,

or dangerously disrupt class and school, have come to be regarded as too disorderly for school to handle, and thus also legitimately excludable (Fabelo et al., 2011; Losen & Gillespie, 2012; Reid & Knight, 2006; Skiba et al., 2003). These policies and practices associated with this meaning of disorder will be well known to readers of this volume on the school-to-prison pipeline.

The second sense of “disorder” connotes illness or disability, as in Conrad and Schneider’s (1992) “medicalization of deviance.” The formal diagnosis of emotional behavioral disorder has historically been vastly disproportionately applied to males, students of color, and students who live with poverty (Harry & Klingner, 2006; Hosp & Reschly, 2003; Oswald, Coutinho, & Best, 2002). Furthermore, the diagnosis has been used across the nation to rationalize segregated placements out of general education classrooms and yet further to alternate schools (Fierros & Conroy, 2005). Research with principals indicates that they regarded disruptive behavior as their greatest challenge when building inclusive schools (Avisar, Reiter, & Leyser, 2003; Houser, Bell, Dickens, & Hicks, 2010). Even inclusive principals have been willing to segregate students who were regarded as having diagnoses of emotional and behavioral pathologies (Barnett & Monda-Amaya, 1998; Praisner, 2003). Thus, an examination of the school-to-prison pipeline can also quite legitimately take up medicalized segregation as a twin practice to disciplinary exclusion via suspension.

### *PBIS as Policy and Practice*

The leaders in this study worked within the framework of the Individuals with Disabilities in Education Act (IDEA) (United States Department of Education, 2004), reauthorized in 2004. IDEA established PBIS and RTI as major features of the landscape of inclusion. PBIS intended to replace exclusionary discipline practices such as suspension and expulsion with more therapeutic supports in the classroom and the school when students showed emotions and behaviors that were most troubling in the context of school (Sugai, 2010). RTI intended to do likewise with respect to disabilities that impacted academics (Jimerson, Burns, & VanDerHeyden, 2007). The system was based on a public health triage model for diagnosing the most critical cases and applying appropriate interventions to return a basic stasis to the situation (Merrell & Buchanan, 2006). Importantly, both RTI and PBIS prioritized giving all students access to high-quality instruction

for academics and clear expectations for behavior as precursors to any further examination of learning or behavior that may go awry.

The terms RTI and PBIS have sometimes been used interchangeably (Gresham, 2005; Hawken, Vincent, & Schumann, 2008). For example, Gresham (2005) proposed the systematic use of RTI as an alternative means to effectively identify up to 20% of the student population he believed had undiagnosed emotional disabilities. Whether called RTI or PBIS, the essential protocols and assumptions of this public health model remain adroitly similar. The pyramid graphic below typifies the images used to represent the RTI/PBIS pyramid, as for example, at a Fairview board of education meeting. The “Academic” side of the pyramid was conventionally referred as RTI, whereas the “Behavioral” side was known as PBIS (Fig. 1).

PBIS established several significant system-wide practices. First, schools and districts established and promulgated consistent behavioral norms and expectations across all spaces and times (Dunlap, Sailor, Horner, & Sugai, 2009), represented by the base of the pyramid. In the parlance of PBIS, this was the Universal Tier I. Indeed, most schools implement PBIS thoroughly only at Tier I.

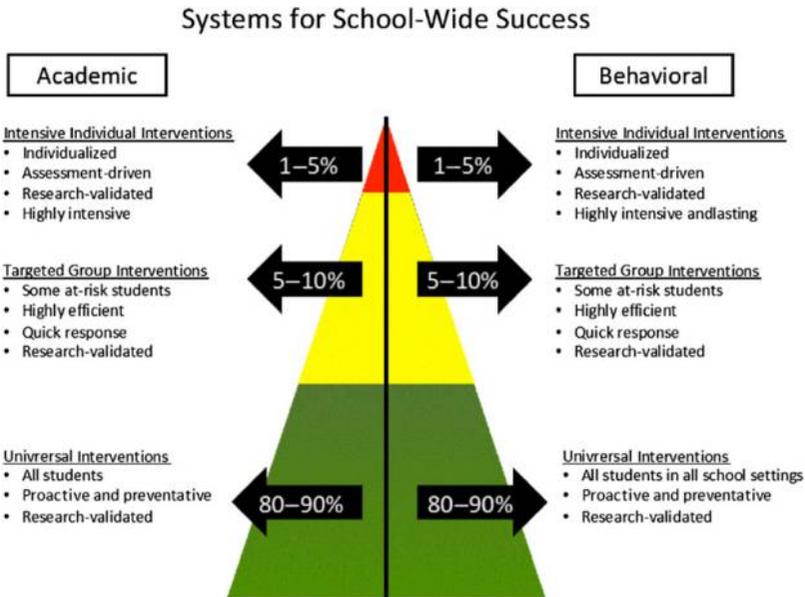


Fig. 1. RTI/PBIS Model.

Nonetheless, the upper tiers of the system have remained important. The upper tiers of the pyramid have represented an escalation of the severity of the labels assigned to the unwanted behavior and the interventions as applied to return the student to baseline expectations. The use of interventions have had two roles: restoring Tier I behavior, and providing data on the student that could be relevant for further analysis and diagnosis. If an intervention at a given tier has restored the student to Tier I behavior, then all was well and good. However, if an intervention has failed in this regard, then this has been taken to indicate that the student had more intense needs, and thus required more intensive interventions (Dunlap et al., 2009). While school personnel themselves have not been diagnosticians, this system became a powerful medicalized discourse, in which unwanted behavior is increasingly seen to originate in an inherent deficit within the student – medicalization of deviance.

Third, PBIS brought with it data collection and analysis as a first level of screening for the entire population of students (Burke et al., 2010). The most prominent data in PBIS – and the most relevant for this chapter – were office discipline referrals (ODRs), used to determine when the level of concern about a student moved from one tier to another (Flannery, Fenning, McGrath Kato, & Bohanon, 2011; McIntosh, Campbell, Carter, & Zumbo, 2009). Some concern has been raised about the validity of using ODRs, in that some researchers believe that early referrals did not necessarily predict a pattern of more referrals to follow (McIntosh, Frank, & Spaulding, 2010). On the opposite end of concern, Bezdek's (2011) study of ODRs revealed the possibility of false negatives, in which students with grave emotional or psychological needs slipped through the cracks of ODR analysis as conducted by PBIS teams.

Herein, some of the confusion between RTI and PBIS has arisen. Some schools may use the PBIS process solely as a Tier I education and universal screening tool to evaluate the entire school (Mass-Galloway, Panyan, Smith, & Wessendorf, 2008), and save RTI for identifying and intervening with individuals of concern (Hawken, Adolphson, MacLeod, & Schumann, 2009; Hawken et al., 2008; Pearce, 2009). Others however, use PBIS for both, ascending the pyramid with more intense identification of an individual's emotional and psychological needs and more intense interventions to match (Eber et al., 2009; Sailor, Dunlap, Sugai, & Horner, 2009; Sugai et al., 2000). Indeed, as the findings below demonstrate, the same confusion existed among leaders in this study. Nevertheless, for the purposes of this chapter in considering PBIS as an alternative to discipline, it is important to identify the basic dynamics of a system that can locate a deficit within the student and avoid other dynamics of institutional power that may be at work.

When school leaders have believed that establishing an orderly school environment requires them to choose between inclusion and exclusion, therapy and discipline, the logics of badness-as-illness and compliance-as-health have been further entangled. The critical lens offered by the present study provides insight into paradoxes that arose in the work of inclusive leaders endeavoring to build schools that worked for all students. For educators who seek to disrupt the school-to-prison pipeline and establish justice in practice, the examples described here may help emphasize how thoroughly we must examine even the reforms put in place with the best intentions.

## METHODS

This multicase study was undertaken in five school districts in a Northeastern state. Participating districts and individuals were selected as a criterion sample (Patton, 2002) of inclusive leaders. All five districts and 15 of 18 individual participants had participated in university partnerships or professional development programs on inclusive leadership (Table 1).

Greendale was the largest city in this region. Pleasant Hills and Fairview were adjacent to Greendale, where Fairview operated like an extension of the city itself and Pleasant Hills the middle class suburb. Lakeview was a small rural community an hour from Greendale. Finally, Clearwell was a mix of rural and suburban, adjacent to a different small college city in the region.

The sites' demographic differences as urban, rural, and suburban were a deliberate part of the study's design because of the opportunities for comparing and contrasting practices and policies among them. Since they were all in one state, the districts were also subject to the same governing policies on discipline and special education. Greendale is the largest city in this economically depressed region of the state. The city was identified in the top tier of cities across the nation with the highest concentration of poverty in African American and Latino communities for the period covered by this study (Jargowsky, 2015).

Within each district, I included the superintendent, the director of special education (or central office equivalent), and at least one principal. The participants were positioned both to set a vision for inclusion and to implement it via policy and application, thereby potentially manifesting principles and practices of inclusive leadership (Frattura & Capper, 2007). Superintendents set the tone and policy for the entire district. Directors of Special Education

**Table 1.** District Demographics.

	Greendale	Clearwell	Fairview	Lakeview	Pleasant Hills
Number of schools	>30	<10	<5	<5	<10
Total enrollment	>20,000	1,000–3,000	1,000–3,000	<1,000	3,000–5,000
<i>Race and ethnicity</i>					
American Indian or Alaska Native	2%	1%	1%	1%	2%
Black or African American	53%	3%	3%	1%	4%
Hispanic or Latino	12%	0%	5%	1%	1%
Asian or native Hawaiian/ other Pacific Islander	6%	1%	1%	1%	2%
Multiracial	0%	0%	4%	0%	1%
White	28%	96%	86%	97%	90%
<i>Additional services</i>					
Limited English proficiency	10%	1%	4%	0%	1%
Students with disabilities (all)	19%	17%	13%	14%	14%
Students with emotional or behavioral disabilities	3%	4%	2%	0%	1%
Free or reduced-price lunch	79%	37%	46%	51%	29%

*Note:* Data collated from annual State Education Department school district report cards and reports of students receiving special education programs and services (State Education Department, 2010, 2012a, 2012b, 2012c, 2012d, 2012e).

and their equivalents implemented PBIS, especially in terms of establishing an alternative to suspension as per Individuals with Disabilities in Education Act (2004). Principals set the discourse and implemented practices for their schools (Table 2).

### *Data Collection and Analysis*

This study triangulated data from multiple sources and data collection strategies (Denzin, 1978). I conducted individual semistructured interviews (Rubin & Rubin, 2005) ranging from 60 to 90 minutes with the 18 respondents individually from January 2011 to June 2012. Initial interviews helped to establish the discourses that each participant employed and

**Table 2.** Sites and Participants.

Greendale	Clearwell	Fairview	Lakeview	Pleasant Hills
<i>Superintendent</i>				
Angela Silva	Ruby Trumbull	Lesley Newsome	Bill Boniwell	Carol Ferrara
<i>District office personnel</i>				
Patrick Quinn, Director of Special Education	Denise Galliano, Director of Special Education	Mary Danton, Chair of Committee on Special Education	Claire Carson, Director of Special Education	Alice DeMartino, Director of Special Education
		Rob Nielsen, Director of Admin.		Michelle Vinter, Coordinator of Youth Development
<i>Principal (school, grades)</i>				
Sian Ingraham (Jones, K-8)	Erin Sanders, Asst. Principal (Clearwell Elementary K-5)	David Underwood (Fairview Middle, 4–8)	Vanessa Blanton (Lakeview Elementary, K-5)	Marcia Brumson (Heights Elementary, K-5)
	Grace Lowthian (Warren, K-8)			

identified opportunities for field observation and pertinent district documents. Final member check interviews (Lincoln & Guba, 1985) with all but two participants who had left their posts during the course of the study probed two essential questions on developing theories: (a) “Do I have this correct?” and (b) “What is the story to be told about this?” I also presented the respondents with the interpretive theories about those data points that I had developed during data analysis (Denzin, 1994) and repeated the same questions in order to verify the validity of my data and conclusions.

For 12 months beginning in March 2011, I conducted 19 field observations (Adler & Adler, 1994; Bogdan & Biklen, 2007). Participants indicated that their leadership on relevant matters could be observed in these sessions. The observations included planning and implementation meetings for PBIS, data review sessions on individual students and on aggregate data, staff development sessions, and faculty meetings.

Documents gathered from the field and from websites associated with the districts constituted another data set (Hodder, 1994; Zeeman, Poggenpoel,

Myburgh, & Van, 2002). Participants volunteered artifacts of field observations and documents to me during interviews, such as data recording forms, meeting agendas, and supporting graphics. I also gathered documents from websites of the five districts and of the State Department of Education.

Within a grounded theory approach (Glaser & Strauss, 1967) to the data, I used open and axial coding via NVivo software to yield emerging themes (Richards & Richards, 1994; Welsh, 2002). Critical discourse analysis (Gee, 2012) and Foucauldian discourse analysis (Hall, 2001; Harwood, 2003) of the data helped to establish the discourses of order and medicalization that emerged. Numerous strategies validating my conclusions included data and method triangulation (Denzin, 1978), negative case analysis (Morse et al., 2002), sample adequacy and saturation (Morse, 1991), member check interviews (Lincoln & Guba, 1985), analytic humility (Kincheloe & McLaren, 1994), and noting my subjectivities (Walkerdine, Lucey, & Melody, 2002) via reflective journaling (Rolfe, 2006).

## SEEKING INCLUSION VIA COMPLIANCE

Inclusive leaders wanted earnestly to include all students. As they described their efforts and led others through planning inclusive systems and problem-solving sessions, they indicated the belief that the tenets of PBIS offered them the best opportunity to do so. Paradoxically, the systems they embraced built a logic that could ultimately justify excluding students who were regarded as having emotional or behavioral disabilities. The commitment to inclusion while simultaneously rationalizing moments of exclusion was neither hypocritical nor insincere. Indeed, it was painful, as all leaders acknowledged their own struggles when sending a disorderly student to a more restricted, segregated environment.

Pulling apart the logic of that rationalization took several steps. In these findings, I have reviewed first the participants' definitions of inclusion. In particular, they defined the principles of successfully including children whom they regarded as having emotional or behavioral disorders. Second, I have compiled their descriptions of the types of behaviors and emotions they found most challenging to include. Third, I have examined actual instances in which these students were identified. Finally, I have presented an extended scenario from one participant. The scenario is an example of how the discourses surrounding a PBIS approach could exchange one deficit identity of the disobedient student for the disabled one.

*Disciplinary Normalcy in Codes of Conduct*

Some of the leaders studied called their practice RTI. Some called it PBIS. Some called it both, and some called it neither. Regardless of the label, the leaders used several of the basic tenets of the RTI/PBIS system as described by theorists (Jimerson et al., 2007; Sugai, 2010). Notably, they (1) expected fidelity to standardized school rules and PBIS procedures; (2) used data to identify students in need of assistance, to determine their needs, and then to prescribe ways to meet those needs; (3) applied a graduated continuum of interventions they regarded as research-validated; and (4) regularly assessed students' behavior in the process known as progress monitoring.

The founding point for their work was how to include students who were regarded as disorderly. And the basis for that identity lay in codes of conduct established in each district and school. All school districts followed a state mandate to specify student behavioral expectations (Project Safe Schools Act, 2000). Normal behavior was codified in the "Student Responsibilities" section. All five districts' discipline policies were notably similar in their expectations. Following school rules was first or second on every list, thereby cementing school authority and power in determining what constituted a good or bad student (Table 3).

Every discipline code instituted normative behavior by requiring students to be responsible for an environment "conducive to learning." The students were thus not only responsible for themselves, but also for the

**Table 3.** Student Responsibility for Learning Environment as per Codes of Conduct.

District	Excerpt from "Student Responsibilities"
Greendale	Contribute to maintaining a safe and orderly school environment that is conducive to learning and to show respect to other persons and to property.
Clearwater	Contribute to maintaining a safe and orderly school environment that is conducive to learning and show respect to other persons and to property.
Fairview	Contribute to the maintenance of an environment that is conducive to learning and to show due respect for other persons' property.
Lakeview	To work to the best of his/her ability in all academic and extracurricular pursuits and strive toward the highest level of achievement possible.
Pleasant Hills	Contribute to the maintenance of an environment that is conducive to learning and to show due respect for other persons' property.  Be safe, and not interfere with the educational process.

common good. Individual students could be held accountable for disruption of the organization of school. Most codes aligned order and safety with learning. While Fairview did not explicitly call for safety and order, respect for property substituted as an equivalent.

In other sections of the codes of conduct, three districts identified some classroom behaviors presumably conducive to learning. Greendale, Clearwater, and Fairview wanted their students to ask questions when they did not understand what was going on in class or with their assignments. Within the text of the codes of conduct, students were not expected to collaborate, show curiosity, create, or even participate. Indeed, the verb “participate” arose only in the most passive sense in the clauses in which students were expected to behave well when “participating in” or “attending” extracurricular events. Typically, in those instances, the students’ good behavior was normalized as acting like “representatives” of the district when they might be on display for other members of the general public. Furthermore, although students were tasked with maintaining an environment conducive to learning, that environment was never actually described. A discourse analysis must examine what is not said along with what is made explicit. The codes of conduct were silent on other behaviors that could enhance environment for learning, such as collaboration and curiosity. This silence contrasted with explicit expectations for respectful and safe behavior created a discourse in which orderly compliance was the basis of normative behavior.

#### *Definitions of Disorderly Behavior: Runners, Biters, and Chair Throwers*

Disorderly behavior arose again and again in interviews and observations as the greatest challenge for inclusive leaders and their staffs. Several behaviors emerged from interviews and observations repeatedly as icons of disorder. Running from class, biting, and throwing furniture were shorthand monikers for the most significant challenges of building fully inclusive schools. In the initial interview, I asked each leader about the most difficult challenges to inclusion. Their responses are shown in [Table 4](#). All respondents focused on behavioral challenges.

Unpacking Director Denise Galliano’s description proves an instructive example of the discursive strategy that defined students based on disorder. She gave her example within an extended discussion of how she wanted Clearwell to use the diagnostic and prescriptive process of PBIS. She

**Table 4.** Descriptions of Behavior.

Participant/District	Behavioral Description
<i>Greendale</i>	
Superintendent Silva	“Basic insubordination, talking back. Not so much egregious behaviors. It’s mainly students being defiant to teachers.”
Director of Special Education Quinn	“We do have a lot of angry kids, and that is where we have got aggression replacement training in some schools.”
Principal Ingraham	“I have teachers right now with kids who are extremely violent. They bite a lot.”
Principal Lowthian	“She sees demons, threatens suicide when she sees demons approaching. She is interfering with her own education and the education of others.”
<i>Clearwell</i>	
Superintendent Turnbull	“Runners are very challenging. The kids who have a ‘flee’ response to stress are very challenging.”
Director of Special Education Galliano	“When their learning is so disrupted or when they are so disruptive to others’ learning, when there is a possibility of injury to others or injury to themselves, when they are spending more and more time out of the classroom due to behaviors, which is going to disrupt their learning, when there are constant office referrals.”
Assistant Principal Sanders	“We do have students with severe behaviors, as most schools do. Violent.”
<i>Fairview</i>	
Superintendent Newsome	“I look at, ‘How do we change any behavior that interferes with that child’s education or the education of others?’”
Principal Underwood	“The emotionally disturbed kids ... they had big breakdowns and meltdowns, a lot of noise.”
Director of Administration Nielson	“I think the kinds of behaviors are when a teacher’s authority is challenged or when they think that kids might be in danger of getting hurt. I think that those are the kinds of behaviors that are most challenging.”
Committee on Special Education Chair Danton	“Explosive. Harmful to self or others. I get involved there, when they rise to that level.”
<i>Lakeview</i>	
Superintendent Boniwell	“Disruption in classrooms. We do not get a lot of physical stuff here. It is mostly just disruptive behavior, upset.”

**Table 4. (Continued)**

Participant/District	Behavioral Description
Director of Special Education Carson	“He [Superintendent Boniwell] is not going to tolerate kids throwing chairs and hurting other kids.”
Principal Blanton	[Regarding a boy who had hidden in the bathroom one week prior to the interview.] “And the next day he was fine. But who knows when that can happen again. That’s a real challenge. It makes me really nervous when I can’t be in the building. Not that I’m any miracle worker but to let somebody else be responsible for that kinda stuff – and that’s a dangerous situation, have him locked in the bathroom and then climbing on top of the walls. So those are challenges.”
<i>Pleasant Hills</i>	
Superintendent Ferrara	“Acting out behaviors can be avoiding work I have trouble doing. Also, there’s the kid who makes poor choices because experiences and role models have developed that pattern. Choices are impulsivity, rather than making good choices.”
Coordinator for Youth Development and Leadership Vinter	“Slapping, biting, hitting other children. There were really truly safety issues. Running out of the classroom.”
Principal Brumson	“The bigger challenge still remains for the cafeteria staff and it’s really about aides who don’t get it. You know, they just see somebody being naughty and needing to make him comply.”
Director of Special Education DeMartino	“Defiance and noncompliance.”

expected that the schools should identify a student as needing interventions when

[t]heir learning is so disrupted or when they are so disruptive to others’ learning, when there is a possibility of injury to others or injury to themselves, when they are spending more and more time out of the classroom due to behaviors, which is going to disrupt their learning, when there are constant office referrals.

“Disruption” grounded her description. The disruption was to classroom order regarded as necessary for learning. Galliano also signaled that her scope of concern was not simply the child herself, but also peers. Disruption was followed by the threat of injury early in the description and yet bore repeating in a reprise.

As for safety, Galliano reemphasized a duty to protect the student and peers. Furthermore, it was not the act of violence per se, but the potential of violence that she noted. In this phrase, the person who could predict or interpret “the possibility of injury” was unnamed. Tacitly, the listener was to assume this was an educator.

“...spending more and more time out of the classroom” described the establishment of a pattern. This was an important moment in the description. It indicated that single incidents may not warrant concern, but repeated and patterned ones did. Patterning was epistemologically significant. It conveyed the truth of interpreting student behavior as disruptive.

“...constant office referrals” reinforced two hallmarks of this troubling scenario. First, the constancy spoke to patterns. Second, sending a child to the principal’s office via a referral was an official action, resulting from adult judgment of something wrong. Thus, the adult’s judgment was verified as a way of knowing students as disorderly.

Referrals were more than acts, though. When they were collated, calculated, and tracked, they became data that evidenced disorder. Galliano embedded the example of problematic behavior in a discussion of the data-driven regime of PBIS, even if she did not specifically call it so at this moment. Moreover, her focus on reading the data and searching for causes in the patterns signaled the power of school authorities. In her view, they had a responsibility to maintain order and safety plus a further duty to diagnose the underlying etiology of unwanted behavior and do their best to find a therapeutic cure. Grounding that work in data – as she alluded to the PBIS tenets – demonstrated a positivist discourse that lay at the heart of medicalization.

Running, biting, and chair throwing showed up repeatedly in these descriptions as paradigmatic behaviors and were echoed in most interviews and observations. They were used so frequently that I chose to examine them as symbols of disorder. They held power as explanatory devices in discourses of alterity and mental illness. For example, chairs were ubiquitous classroom objects. How they were arranged in any classroom spoke volumes about the order of that learning space: Were they arranged in rows, indicating decades of stand-and-deliver teaching? Were they arranged around tables, hinting at cooperative learning pedagogies?

Thus, whenever these educators invoked “throwing a chair” in descriptions of student behavior, that language symbolized that the student was misusing the furniture according to the accepted social organization of a classroom. Also, students were to sit on their chairs. References to chairs thus not only spoke to the use of those objects but also to the regulation of

student bodies in the classroom. Sitting on chairs was passive, whether done in rows, at collective tables, or in a circle. Throwing was far more active – transgressively active – because sitting was the socially sanctioned use of chairs. Throwing chairs also signaled danger from an irrational threat. A thrown chair could not be caught like a ball in physical education class or at recess – the conventional ways of throwing anything in school. Thus, the phrase “throwing a chair” conveyed two ideas: (1) a student was harming others and (2) a student was irrational. In effect, that icon alluded to disorder in both its meanings: disorder-as-turmoil and disorder-as-pathology.

### *Applying PBIS Principles*

Pleasant Hills, Fairview, and Greendale had been cited by the State Department of Education for suspending too many students with disabilities in recent years. Furthermore, during the same period as this study, Greendale was investigated as one of 20 urban districts that regularly, excessively, and disproportionately suspended students of color and students with disabilities (Losen & Martinez, 2013). Impelled by these accountability measures, the leaders turned to PBIS as their systematic remedy.

In Pleasant Hills, Coordinator Vinter made her case for PBIS by focusing on the power of fidelity when an entire institution was using the same PBIS practices. She compared two schools in the district through the lens of a school nurse who transferred from one to the other. The nurse had moved from the school with the longest history of using PBIS to the newest.

They've been implementing for 10 years. She went from going to South Street Elementary to Rhodes Elementary. Rhodes was our last elementary on board with PBIS. She called me one day, and she said, “Michelle, there's a marked difference between the behavior of the kids at South Street,” which is our lowest socioeconomic, Title I school, “to the kids at Rhodes,” just typical kids.

The kids at South Street really embraced the model and understood the expectations and followed the rules better. To me that was just kind of anecdotal testimony that if you implement the model with fidelity, you're going to get positive results. South Street has the fewest discipline problems. I know some of that is based on the principal and the personalities of the teachers, but all in all, I think it's testimony to the fact that teachers really embrace PBIS.

Vinter found the nurse's analysis of such a disjuncture between the two schools compelling. As she described the power of implementing PBIS with fidelity, she was actually talking about social class more than each school's history with PBIS. Vinter decoded what was so shocking to the nurse. She

explained parenthetically that South Street was a school of the “lowest socioeconomic” class, as opposed to Rhodes’ population of “just typical kids.” Title I was a federal support program for schools whose academic performance and socioeconomic status were low. Thus, Vinter intimated that South Street was not only a poor school economically but also academically. In this narrative about South Street, orderly behavior was remarkable not only because it was pervasive, but also because one would expect good behavior more from “typical kids” than from those in a low performing and low socioeconomic class school. Those deficit identities did not fit with normative orderly behavior.

What got the credit for breaking that expectation? Implementing PBIS with fidelity over time was the evident cause in this discourse. And, beyond 10 years of implementation, “embracing” PBIS also epitomized success. Systematic fidelity was more powerful than social class and even more powerful than the “personalities” of the teachers or the leadership of that school in this narrative, although Vinter believed they may have a part in South Street’s success as well. The major lesson of this account of two schools was that if fidelity led to success in a significantly deviant school, then it should certainly work in a normal one.

All the schools included in this study had teams that focused on troubling students. Although the precise composition of each team varied, they generally included the building administrator, social worker, psychologist, and academic specialists, such as a reading teacher and a nurse. Items pertaining to disorderly students dominated agendas of these teams. At Jones School in Greendale, Principal Ingraham presided over a weekly meeting of her Student Staff Support Team (SSST). In two hours, the SSST discussed 16 students. All but one were behavioral concerns.

The same pattern was evident in meetings of the Lakeview School Based Intervention Team (SBIT). The team worked through an agenda of 13 students in June 2011. As each child was discussed, emotions and behavior were not always presented first. However, for 12 of 13 students, the discussion turned to emotions and behavior as the presumed roots of the issues at hand.

When Principal Vanessa Blanton reflected on this afterward she was surprised, but believed it may have been due to the calendar. She reasoned that by May and June, teachers had tried all the strategies they knew. Having exhausted their repertoire and energies, teachers came to believe that behavioral or emotional causes were undermining their students’ success in class. Checking out that calendar explanation, I attended another SBIT team meeting in October 2011. That meeting was conspicuously

similar to the June gathering. Again, behavior became the eventual topic of discussion for all ten children on the agenda.

The SBIT team often employed two deficit discourses of family to explain students' disorderly behavior and unruly emotions. The first deficit discourse described students' homes as chaotic. Parents in jail, the loss of a job, the intermittent presence of pseudo-parental boyfriends or girlfriends of mother or father, prolonged illness, all figured in the SBIT team's analysis of causes for a student's disorderly behavior. Second, the team made comparisons to other family members. Team members explained the current child's behavior by referring to disorderly behavior and emotions of siblings, parents, and other relatives who attended Lakeview schools.

The team also used pathology as an identity marker in itself. This came in several forms. One version was using psychopathological diagnosis as shorthand for student need. Psychiatric diagnostic labels ([American Psychiatric Association, Task Force on DSM-IV, 2000](#)) such as Asperger's syndrome, pervasive developmental disorder, and attention deficit disorder mixed with other diagnostic references, such as "selective mutism," and "obsessive compulsive" (which only needs the word "disorder" to itself be a DSM-IV label). A second related strategy was invoking pharmacology as an effective response or intervention, as when the nurse reinforced her claim that a student had attention deficit disorder by commenting that she would be a good candidate for medication. Third, the team entwined pathology ("selective mutism"), bad parenting, and heredity as causes for disorder, noting that the parents allowed the children to "run the house."

### *Using Data*

These team meetings exhibited this kind of anecdotal data analysis. All the included districts identified disorderly students based on what they considered to be sound data. Greendale's Special Education Director Quinn presided over meetings of a broad district team of administrators, teachers, and mental health specialists from the district and the city. He had convened this diverse group to design Greendale's PBIS pyramid because he regarded the planning and implementation of PBIS as "bigger than special ed." The participants in those meetings came back repeatedly to endorsing ODRs and attendance records as data to identify students in need of support beyond Tier I and as trigger data to move a student up subsequent tiers of their PBIS pyramid.

In one pivotal meeting, that endorsement withstood challenges from the Director of Elementary Education and the Parent Advocate who questioned

how PBIS would function in a district with a discomfiting legacy of institutional racism. How could ODRs be trusted when “teachers who don’t look like our students” wrote petty referrals, according to the Director? Furthermore, behavioral data and analyses had a danger of being used to construct “our kids” as “buck wild and needing mental health services” in the view of the Parent Advocate. After some meandering discussion, a school psychologist asserted that she and other clinical specialists held the keys to solving that dilemma because “good assessment drives strategies.” Director Quinn allowed that declaration to stand. His clear message was that Greendale was choosing PBIS data analysis to diagnose students as a way to “deal with race” as the Elementary Director insisted they should.

Although he did not refer to it in this meeting, Quinn regarded Warren School’s use of data as a model for the district. During one of my field observations at Warren, Principal Lowthian highlighted for me the school’s “war room” that had earned Quinn’s approval. The room featured a wall of response to intervention charts for reading achievement facing a wall of PBIS charts for behavior (Fig. 2). A PBIS pyramid on which the teacher had written students’ names in the appropriate colored tier represented each class. The room gave Lowthian and colleagues an immediate way to know the school at a glance. They might also zoom in on a particular class or student to see where s/he was placed on the pyramid. The room’s nickname drew on military symbolism of course, in which the stakes are high, resources are precious, accurate “target” assessment is necessary, and the overall corrective system intends to work reliably on the population in question. In the context of regarding PBIS as dealing with emotional or behavioral disorder, the analogy was much like symbolism used in the “war on cancer” (Sontag, 1990).

*Medicalization Discourse Permeates Data Analysis,  
Identification, and Intervention*

On a staff development day, Assistant Principal Sanders called together the district’s social workers, counselors, and an elementary principal for a discussion on how to implement RTI strategies for children whose behaviors were regarded as disorderly. Sanders introduced a data review of ODRs to set the ground for when and how to apply interventions. She brought the group’s attention to an accounting that 36 students received 448 referrals last year, and translated that into percentages: “17% of the kids got 61% of the referrals.”

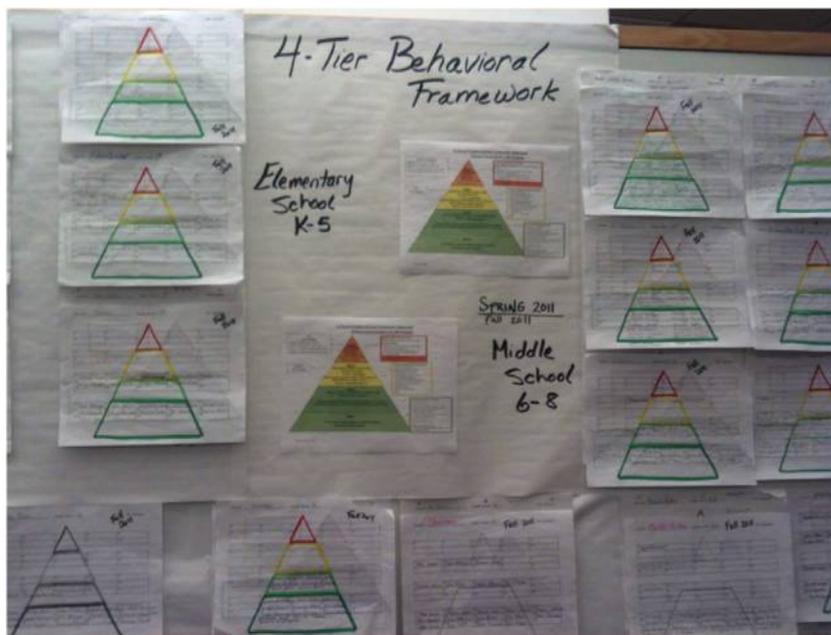


Fig. 2. PBIS Data Wall in the “War Room.”

One social worker’s reaction was immediate. “They’re mine! They’re ED!” By this she meant that they were part of her caseload because they had been classified as emotionally disturbed.

From there, the discussion moved to examining the referrals themselves, whether they were consistently entered in the electronic student database called SchoolTool, and what the coded behaviors meant. For example, Sanders noted that she and the principal of her school were continually reinforcing with teachers that they should log referrals in SchoolTool. At the same time, she challenged the usefulness of some codes. “Inappropriate behavior is not always a good descriptor,” she said. The social worker reinforced this point, noting that the statistics for “inappropriate language” would have been a lot higher “if we SchoolTooled every incident.”

Sanders responded assertively that students “need to know that we will suspend for threats of ‘I will kill you.’” As evidence that this sanction had become more accepted, she noted that suspensions were down for that behavior. Thus she believed students had gotten the message. “We talk about biculturalism, where they know that school is different.”

With “biculturalism,” Sanders used the discursive strategy of normalizing orderly behavior in this discussion. The “biculturalism” she referred to here picked up a point from an earlier exchange at this meeting in which the turmoil of many Clearwell families was attributed as a root cause for ODRs. Sanders was telling the group that a school culture of order and safety would prevail and would be the basis against which deviance was judged.

This “biculturalism” also harkened back to our initial interview, in which Sanders explained her position as an inclusive leader. Sanders understood her mission as “compassionate,” particularly in reference to negotiating the social class discourses of home and school.

You know, love is. I’m pretty tough on the kids. I grew up working class. I am not from an educated family. My older brother. I moved around a lot, my family, so I identify actually with some of our most severe families here. That’s my background. I have my degrees up on the wall because that’s a miracle to me. Those are a miracle. If you knew my upbringing, you would know that that’s a miracle. The dissertation’s a miracle. I identify with those kids. I’m getting emotional. I’m working class, and one of the things I always have to mitigate is middle class discourse, because sometimes our kids need tough love. No one’s going to save them. No one saved me.

Sanders preferred to read disorderly behavior as an expression of working class culture, rather than illness. She saw that her school’s behavioral expectations were grounded in middle class values, which she believed were likely different from the values of her students’ homes. Her heartfelt mission was to help students navigate school’s middle class norms for orderly behavior. She tacitly accepted that working class culture was constructed as a deficit by the school – “those kids” with whom she identified were from “some of our most severe families.” In essence, she was coaching working class on how to pass as middle class while in school.

During the staff development meeting, this tension between pathology and class emerged again. As the group worked their way through creating Clearwell’s set of “tiered interventions,” they contrasted two students as examples. In the excerpt below from my observation notes, Sanders and a social worker disagreed about one of the two children.

Principal: You [Sanders] mentioned children of incarcerated family members, and you’re [Social Worker’s] mention of kids with more needs is important. Let’s look more at that.

Sanders: We could go down the case list [of students getting Tier II support], to see what are the themes of what’s going on with them.

Social Worker: We have kids with emotional disabilities, or things going on that are emotional, and kids with bad behavior. Teachers have a hard time distinguishing.

Like S11,<sup>1</sup> crying and carrying on. He has emotional issues now, but not nearly what they were in 2nd grade. That's a bad example. There's no ED with him.

How about S12, who has emotional issues and will always have issues? He is emotionally disturbed. Tomorrow, he will be emotionally disturbed. He will always be emotionally disturbed.

S11 will tell you, "I have different rules at home and school, and sometimes I get mixed up." He hasn't got deep-seated emotional issues.

Sanders: I'd argue with you about S11. I worry about taking him out of this safe context.

Social Worker: [Chuckling] She always argues with me about him!

Sanders: I worry about him. He's been crying and crawling under his desk.

Social Worker: That's what he does at home.

Sanders: [Collecting her papers.] When can we meet again?

The group used the list of children receiving Tier II intervention as a reference point. The RTI/PBIS pyramid thus became the technology for defining students' deviant identities. Regardless of whether the etiology of deviance was coming from a home with an incarcerated family member or "deep-seated emotional issues," the pyramid showed the students to be comparable.

Could schools deal effectively or not with that deviance, and what did that mean for the student's identity? This was the subtext of disagreement between the social worker and Sanders. Indeed, it was the logic at the heart of diagnosing someone's response to intervention. Sanders implicitly concurred with the social worker that there were students like S12 who had a legitimate disability. She attempted to destabilize that category, however, stating that a "safe context" was crucial to this student. Furthermore, she signaled that a student with an emotional disability might legitimately be excluded by being taken out of that safe context.

The social worker asserted that the student's behavior was the "same at home." She acknowledged Sanders' list of disruptive or disorderly behaviors, such as crying and crawling. However, if they were the same at home, the social worker implied that the cause lay within the student, regardless of context. Thereby, she discursively constructed the student as having an emotional disability. Significantly, Sanders dropped her challenge at this point and shifted the agenda to scheduling their next meeting.

In a follow-up interview, Sanders reflected on that exchange. Although the moment had a playful, collegial tone, it underscored some tensions. "I think that's part of, probably, what we're wrestling with as a community. What is the difference between those two concepts of a student?"

Sanders laid out how best to make that distinction. Her description was a powerful statement of the diagnostic discourse of response to intervention.

I think part of it might be that, for the student who's naughty, there's a possibility that that child could self regulate and relearn behaviors and be shifted in their behaviors. I think, when we start looking at that Tier III level, we're also looking at students who may not have the capacity themselves to regulate, who are subject to ... They themselves don't have the skills in them. And I think that's where, with that one student, we go back and forth on, "Can the student regulate, can he not regulate? Will this student ever have a moment where they know what's right and what's wrong?"

For Sanders, a naughty child could learn, change behavior, and could internalize that change to the point of self-regulation. This was posed as normalcy. Within that normalcy, she had earlier signaled that she believed that someone who switches codes between working class behaviors and middle class behaviors is skillful and admirable. Thus, she expected students to have made school's behavioral expectations so thoroughly their own that they could self-discipline (Foucault, 1979) – and even do so nimbly.

From Sanders' perspective, if disruptive students were not naughty-turned-disciplined, then they might never show the capacity to tell right from wrong. Importantly, Sanders posited that tiered interventions would reveal the true pathology in a student. Thus, the technology of the pyramid discursively created the student as having a disability.

## CONCLUSIONS AND IMPLICATIONS

Paradoxically, the leaders in this study enacted discourses that pathologized and prioritized control, even as they sought to move away from punishment. To begin with, they rooted their description of ideal behavior in Codes of Conduct that emphasized compliance and order. Second, they used office discipline referrals as the fundamental data to measure students' deviation from that behavioral norm. Third, the protocols of PBIS drove them to interpret that data as evidence of behavioral disability. Such analysis led them to substitute one deficit identity – disordered student – for another – disorderly student. Indeed, it could even lead them to substitute one version of exclusion – medical placement at another facility – for disciplinary suspension.

A growing body of literature challenges the cultural proficiency of a one-size-fits-all PBIS system (Bal, Thorius, & Kozleski, 2012; Fallon, O'Keeffe, & Sugai, 2012; Sugai, O'Keeffe, & Fallon, 2011). In related

critiques of RTI, Artiles (2007) and Ferri (2012) dispute the validity of a medicalized approach to students that psychopathologizes them. Annamma, Morrison, and Jackson (2014) draw the two together in examining their connection to the school-to-prison pipeline.

The evidence in this chapter argues that in order to create a system that “mirrors the aspirations” of our students, social justice leaders should not only implement culturally responsive practice but also deconstruct the falsely scientific medicalizing discourses embedded in conventional PBIS practices. They ought not fall prey to a system that swaps one deficit identity for another. Both “bad” students and “disabled” students are marginalized students whom schools make impossible to include (Youdell, 2006).

Nonetheless, I would contend that there are several promising possibilities for culturally responsive and democratic practices that may significantly disrupt the school-to-prison pipeline. The first would be seeking balance in the analysis of PBIS data. As documented here, the upper tiers of PBIS as practiced were fundamentally analyzing deficits. Data-informed leadership could interrupt this practice simply by documenting strengths as thoroughly as documenting deficits. In another balancing data analysis, the lens of data analysis and intervention could be turned back on adults and the school’s systems as much as it is trained on students. For example, it is one thing to analyze who is receiving office discipline referrals and disciplinary consequences for student patterns. Better practice would be to profitably disaggregate for race, class, disability, gender, and language proficiency of the students, as suggested in a new wave of literature on culturally responsive PBIS (Bal, Kozleski, Schrader, Rodriguez, & Pelton, 2014; Bal et al., 2012; Jewell, 2012). If in theory, PBIS is supposed to address both student and staff behaviors, it would be equally profitable to turn the same focus on the teachers, administrators, and discipline codes that enact those referrals and consequences. In that way, analysis shifts from the passive voice in which students are the objects of disproportionate discipline to the active voice in which a school and its adults are the subjects. Disaggregating referrals by race, gender, disability, and economic status of the adults would constitute a balanced and culturally responsive data analysis. Likewise, examining codes of conduct for implicit sexism, ableism, racism, and classism would provide a richer and more just understanding of the culture, climate, policies, and practices of a school.

This balanced and culturally responsive data analysis will occur best in a democratic sharing of school power. With all stakeholders involved in analyzing data and setting behavioral expectations, other perspectives come to the table to guide the process, as some districts are doing in the work

described by Bal et al. (2014, 2012). Although broader participation is promising, it may not be sufficient, as the Greendale planning meeting illustrates. The literature on effective social justice leadership suggests strongly that democratic participation on implementation must be joined with uncompromising visionary leadership for just and inclusive schools (Capper, Theoharis, & Sebastian, 2006; Larson & Murtadha, 2002; Theoharis, 2007). To that end, leaders would do well to keep the focus on establishing justice rather than restoring order and avoid swapping disciplinary stigmas of “disorderly” students for medicalized stigmas of “disordered” ones. This chapter argues that maintaining a critical eye toward the allegedly scientific discourses of PBIS is one important component in doing so.

Some more early work on culturally responsive PBIS not only speaks of democratizing the process but also grounding the school’s expectations in terms that are relevant to the cultures of the students of that school. In one New Mexico school for example, much productive work went into reinterpreting Tier I expectations from a generic PAWS (*P* = Be Positive and Polite, *A* = Achieve Your Goals, *W* = Work Hard, and *S* = Stay Safe) to the Diné word *T’ahwija’iiteego*, meaning that an individual is “responsible and accountable for one’s own choices” (Jones, Caravaca, Cizek, Horner, & Vincent, 2006). Relevant biographies of Jim Thorpe, Chief Wilma Mankiller and others communicated the core principles in the Tier I lessons promoting those values.

One can imagine local stakeholder groups doing likewise in communities across the country. However, I would argue that the democratic process should go further than defining a locally relevant set of expectations. PBIS systems must use data that reflect those expectations and not default to disciplinary data such as office discipline referrals.

They may have to create such data points. For example, if a school used universal expectations such as mastery, belonging, independence, and generosity such as are found in a promising multicultural behavioral program known as the Circle of Courage (Brendtro, Brokenleg, & Van Bockern, 2002), many more kinds of data would count as identifying acceptable and unacceptable behavior. Likewise, different interventions would be applied, as the PBIS teams tried to encourage either mastery, belonging, independence, or generosity, rather than compliance alone. Developing those new definitions of acceptable behavior, signifying data, and interventions would involve the courageous conversations (Singleton & Linton, 2006) that deconstruct White privilege and culture as they manifest in behavioral data, as they then define more liberatory paradigms.

What these promising alternatives have in common is that they more closely resemble restorative justice paradigms. When disruption occurs in a community, these methods call into question the imbalance of power in that community. Understanding the root expectations of a community and its structures for maintaining them is crucial in establishing justice. Understanding how power comes to be expressed by individuals is likewise at the heart of building justice rather than restoring order. Changing the PBIS conversation in these ways would acknowledge that the structure is a fixed part of the current landscape, as King (1968, 2010) did in identifying the necessity of social welfare programs. Doing so and having the courage to analyze adults and the school culture as a whole I argue would be major contributions to creating school systems that builds justice rather than simply restores order.

Furthermore, restorative justice should be the first option rather than PBIS to disrupting the excessive discipline of the school-to-prison pipeline. Restorative justice fundamentally shifts away from blaming students for the conflicts in which they find themselves, and seeks just resolution rather than stigmatizing deficit labeling. Implementing culturally responsive PBIS can itself be a practice of restorative justice but only if it simultaneously takes on the medicalizing deficit practices and assumptions within conventional PBIS. Challenging the school-to-prison pipeline should be rooted in creating schools that affirm our students' aspirations, not replacing the disciplinary structure of enforcing compliance with another.

## NOTE

1. S11 and S12 are the eleventh and twelfth students discussed in the meeting.

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