



March 20, 2023

Catherine E. Lhamon
Assistant Secretary, Office of Civil Rights
Department of Education
400 Maryland Ave, SW
Washington, DC 20202

Re: Request for an Investigation of the Provision of General and Special Education for the Children in the Custody of the Office of Juvenile Justice (OJJ) While Imprisoned at Angola State Penitentiary and Other Secure Care Facilities.

Dear Ms. Lhamon,

We are writing to express our profound concern about the recent decision to move vulnerable students in the custody of Louisiana’s Office of Juvenile Justice (OJJ) to the Louisiana State Penitentiary at Angola (“Angola Penitentiary”), and its dire implications for the educational opportunities of these children. This misguided and unprecedented move raises a number of serious questions under state and federal law, the Individuals with Disabilities Education Act (“IDEA”), Section 504 of the Rehabilitation Act of 1973 (“Section 504”), and Title II of the Americans with Disabilities Act (“ADA”). It is also entirely inconsistent with decades of juvenile justice and public safety best practices, years of investment in juvenile justice reform efforts, and our growing understanding of childhood development and safety.¹ We write today to request a federal investigation of the impact of the state’s decision on the general and special education rights of the children in OJJ custody who have been moved to Angola Penitentiary.

Additionally, we are requesting a broader investigation into the system of education in Louisiana’s secure care facilities. Children in secure care facilities are the most vulnerable students in the state and in the most need of educational support. There is growing evidence that these children are not receiving the required educational services. Black children and their families are the most affected by these systemic failures and this reflects the alarming disparities within the juvenile justice system and the educational system.

Background

¹ As Glenn Holt, the deputy director of Arkansas’ juvenile justice agency, recently expressed, “Moving kids to your adult maximum security prison campus, where you send adults to die, is the worst juvenile justice policy decision probably ever made in modern times.” Erin Einhorn, *Teens in a Louisiana Juvenile Justice Facility Are Being Sent to Angola Prison. Experts Say It’s Not Only Cruel, It Could Violate the Law*, NBC News, <https://www.nbcnews.com/news/us-news/louisiana-sending-youth-angola-prison-rcna39150>.



Angola Penitentiary encompasses twenty-eight square miles and is located on a former slave plantation in West Feliciana Parish. Larger than the island of Manhattan, the prison is surrounded by water on three sides and is situated in an isolated, rural portion of the state. It is the largest maximum-security facility in the United States, with over 5,000 incarcerated individuals.² In this isolated setting, correctional officers, staff, and their families live on the prison's grounds with little oversight. Angola Penitentiary has a deplorable record of human rights violations that spans decades and has endangered the lives of incarcerated adults and resulted in their deaths.³

The Louisiana Office of Juvenile Justice (“OJJ”) is the state agency responsible for the care of youth in the juvenile system. OJJ operates an overcrowded, failing system of juvenile detention facilities. Approximately 83% of youth in OJJ’s custody are Black⁴ in a state where Black people only comprise 31% of the population. These are children charged with delinquency or adjudicated delinquent; these are civil proceedings, not criminal. At a press conference on July 19, 2022, Louisiana Governor John Bel Edwards announced that to address severe system failings at another juvenile facility, the state would begin transferring children to Angola Penitentiary.⁵

Angola is not equipped to provide the necessary education to children. OJJ has had difficulty hiring teachers, therapists, and staff at several juvenile facilities located in more populous areas of the state, which has contributed to violence at several juvenile facilities and severe staffing shortages in both agencies, according to OJJ officials.⁶ In order to attract more employees to OJJ, the agency recently removed some of its requirements for screening employees for pedophilia threats.⁷ Angola Penitentiary has also experienced severe staffing shortages due to its isolated

²David Oshinsky, *THE VIEW FROM INSIDE THE NEW YORK TIMES* (2010), <https://www.nytimes.com/2010/06/13/books/review/Oshinsky-t.html> (last visited Sep 8, 2022).

³ See Joe Gyan jr. jgyan@theadvocate.com, *JUDGE APPROVES AIR COOLING PLAN FOR DEATH ROW THE ADVOCATE* (2014), https://www.theadvocate.com/baton_rouge/news/article_3a983deb-a55e-5b84-912b-005b85104b5e.html (last visited Sep 8, 2022). (Chief U.S. District Judge Brian Jackson ruled in 2013 that heat indexes in Angola’s death row facility constituted cruel and unusual punishment); Lewis et al. v. Cain et al., *SOUTHERN POVERTY LAW CENTER*, <https://www.splcenter.org/seeking-justice/case-docket/lewis-et-al-v-cain-et-al> (last visited Sep 8, 2022) (Southern Poverty Law Center and litigation partners filed a class action lawsuit in 2015 detailing the ‘deliberate indifference’ of prison officials to the medical care and needs of numerous adults incarcerated in Angola); Four supervisory correctional officers at Angola prison sentenced for beating a handcuffed and shackled inmate, *THE UNITED STATES DEPARTMENT OF JUSTICE* (2020), <https://www.justice.gov/opa/pr/four-supervisory-correctional-officers-angola-prison-sentenced-beating-handcuffed-and> (last visited Sep 13, 2022).

⁴ *Office of Juvenile Justice 2019 recidivism analysis*. (n.d.). Retrieved January 29, 2023, from <https://ojj.la.gov/wp-content/uploads/2019/09/2019-Recidivism-Analysis.pdf>

⁵ JAMES FINN | Staff writer, *Teens from youth facilities statewide may end up at Angola Unit, Louisiana official says* *The Advocate* (2022), https://www.theadvocate.com/baton_rouge/news/crime_police/article_96d4972a-2ec4-11ed-a247-7fc1d88fdbcd.html (last visited Sep 8, 2022).

⁶ Julie O'Donoghue, L. I. S. 13. (2022, September 14). *Louisiana could face staffing shortage in moving incarcerated teens to Angola*. Louisiana Illuminator. Retrieved January 29, 2023, from <https://lailluminator.com/2022/09/13/louisiana-could-face-staffing-shortage-in-moving-incarcerated-teens-to-angola/>

⁷ Julie O'Donoghue, L. I. A. 9. (2022, August 12). *Louisiana Youth Prison Job Applicants Who Fail Abuse Screening Get Second Chance*. Louisiana Illuminator. Retrieved January 30, 2023, from <https://lailluminator.com/2022/08/09/louisiana-youth-prison-job-applicants-who-fail-abuse-screening-get-second-chance/>



location. In 2022, officials at Angola Penitentiary moved 600 incarcerated adults to another facility where it was easier to attract corrections officers.⁸ Initial plans to staff juvenile education services and programs in Angola relied on the school principal, head of healthcare for youth, and other staff, splitting time between Angola Penitentiary and the Bridge City Center for Youth, which is 150 miles away.⁹ Angola Penitentiary and OJJ’s lack of infrastructure for youth education, and the severe staffing shortages in both agencies, are creating severe educational neglect and deprivation for the children in Angola Penitentiary. Louisiana is legally obligated to provide consistent general and special education under federal law when incarcerating children.

The Louisiana Office of Juvenile Justice, the Department of Corrections (“DOC”), the Special School District (“SSD”), and the Louisiana Department of Education (“LDE”) are the state agencies responsible for providing education and rehabilitative services to children in youth detention. Many of the students entering into OJJ custody are already educationally disadvantaged and are more likely than their peers to have learning and behavioral disabilities that entitle them to special education reports and accommodations.¹⁰ We are concerned that youth currently incarcerated in Angola Penitentiary are suffering serious academic regression and will lose the opportunity to learn core skills necessary for their employment and success as adults.

Two of the youths incarcerated at Angola Penitentiary recently joined a lawsuit against the governor and OJJ.¹¹ In their court filing, they alleged prolonged isolation in windowless, filthy jail cells and their account of conditions and educational interruptions due to facility failures offer a first-hand account of the problems plaguing the state’s plan to place youth in this adult prison.¹² One youth notes that there is “only one permanent teacher” in Angola, who splits his time between two classrooms. All youth receive the same work, regardless of different grade levels. One youth who has an Individualized Education Program (“IEP”) and has been diagnosed with Attention-Deficit Hyperactivity Disorder (“ADHD”), Post-Traumatic Stress Disorder (“PTSD”), and bipolar disorder, reports that he has not received any IEP services or supports since he was taken into OJJ custody.¹³

This state of affairs is, sadly, unsurprising. In anticipation of the proposed transfer of youth to Angola during the fall of 2022, local advocates wrote a letter demanding a detailed written plan with specific information about how children at Angola Penitentiary will receive the general and special education guaranteed to them under state and federal law. A detailed written plan was not provided, instead documents obtained by local media outlets indicate that OJJ used an existing

⁸ Id.

⁹ Id.

¹⁰ Louisiana Center for Children’s Rights. (n.d.). *Learning Interrupted: The Educational Crisis in Louisiana’s Juvenile Secure Care Facilities*. DocumentCloud. Retrieved February 17, 2023, from <https://www.documentcloud.org/documents/22925375-learning-interrupted-1#document/p14/a2153006>

¹¹ Weill-Greenberg, E., O’Connor, M., Ganeva, T., Baskin-Sommers, A., Camacho, J., & Blackwell, C. (n.d.). *Louisiana imprisons children in a former death row unit. the kids say it haunts them*. The Appeal. Retrieved March 2, 2023, from <https://theappeal.org/angola-prison-children-death-row-louisiana/>

¹² Julie O’Donoghue, L. I. J. 6. (2023, January 6). *Youth held at Angola allege violence from guards, extended lockdown in lawsuit*. Louisiana Illuminator. Retrieved March 2, 2023, from <https://ailluminator.com/2023/01/06/youth-held-at-angola-allege-violence-from-guards-extended-lockdown-in-lawsuit/>

¹³ Google. (n.d.). *Doc 120 motion to intervene DD and ee.pdf*. Google Drive. Retrieved March 2, 2023, from <https://drive.google.com/file/d/1Df8thVeba1fWJcIDmqzJnJqzvNQSMYT/view>



program summary previously entitled “Acadiana Center for Youth St. Martinville Transitional Treatment Unit” and renamed the document “Bridge City Center for Youth at West Feliciana Transitional Treatment Unit” with some additional edits.¹⁴ The twenty-one page document makes ten references to education and simply states “Educational services will be provided to all youth. Educational instruction will be determined based on each students needs for courses according to their graduation plan, learning plan and IEP requirements. Students/ youths who are enrolled in school, will complete assigned coursework via online learning with the assistance of a teacher/facilitator.”¹⁵ The document lacks a plan for implementation and is woefully inadequate.

Repurposing a program outline from the St. Martinville detention center, a facility which routinely failed to provide consistent educational programming to detained youth and came under fire for holding youth in solitary confinement,¹⁶ indicates a lack of commitment by OJJ to provide consistent educational programming to the youth at Angola Penitentiary. Furthermore, the attempt by the agency to rebrand the death row facility at Angola Penitentiary as the “Bridge City Center for Youth at West Feliciana” indicates the agency recognizes the long history of abuse and neglect at Angola Penitentiary and is engaged in a public relations effort instead of developing a comprehensive plan to provide legally compliant programming.

These children are entitled to an education and an opportunity for rehabilitation guaranteed under state and federal law. It is the responsibility of OJJ, DOC, SSD, and LDE to ensure that these crucial services are delivered without interruption.

Legal Rights of Students in OJJ Custody

Children do not forfeit their educational rights when they enter custody. Every student in Louisiana has the right to an education under state law, including the right to attend school through at least their 19th birthday.¹⁷ Louisiana law requires all schools to provide at least 360 minutes of instructional time per day and 177 days of instruction per year.¹⁸ State law makes no distinctions between students who attend schools in the community and those who are incarcerated. OJJ is responsible for providing educational services to students detained at secure care facilities.¹⁹ Education is one of the most integral parts of any successful rehabilitative plan for a child in OJJ custody, and the Louisiana Children’s Code explicitly requires OJJ to provide children with individualized and supportive education.²⁰ By statute, SSD provides special education and related services to students with disabilities in OJJ’s secure care schools.²¹ Under federal law, students in custody are guaranteed the right to continue to receive high school course

¹⁴ *Bridge City Center for Youth at West Feliciana Transitional Treatment Unit Program summary*. (n.d.). Retrieved March 3, 2023, from <https://thelensnola.org/wp-content/uploads/2022/08/Bridge-City-Center-for-Youth-at-West-Feliciana-Program-Summary.pdf>

¹⁵ *Id.*

¹⁶ NBCUniversal News Group. (n.d.). ‘no light. no nothing.’ *inside Louisiana’s harshest juvenile lockup*. NBCNews.com. Retrieved March 2, 2023, from <https://www.nbcnews.com/news/us-news/louisiana-juvenile-detention-st-martinville-rcna19227>

¹⁷ See La. R.S. § 17:221(B).

¹⁸ La. R.S. § 17:154.1(A)(1).

¹⁹ See La. R.S. §§ 17:10.9, 17:100.1.

²⁰ La. Ch. C. art. 905.1.

²¹ See La. R.S. § 17:1945(C).



credits and the opportunity to earn a diploma.²² State agencies are forbidden from forcing students into high school equivalency programs as an alternative to a diploma program.²³

Additionally, children with disabilities have a legal right to special education and related services under the federal IDEA and associated federal and state regulations. Children with disabilities are protected against discrimination under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act. The IDEA requires all public agencies responsible for providing education, including “[s]tate and local juvenile and adult correctional facilities,”²⁴ to provide a free appropriate public education (“FAPE”) to students with disabilities.²⁵ Every student with a qualifying disability under the IDEA must be provided with the special education and related services outlined in his or her IEP.²⁶ The IDEA applies to children in both adult and juvenile prisons.²⁷ When a student transfers to a new school, including a school located in a detention facility or prison, the new school must continue to provide services that are “comparable” to those the student previously received.²⁸ Although a new IEP meeting may be held to change a student’s IEP, all changes must be based on the individual needs of the student,²⁹ and a public agency must provide prior written notice before it proposes to change the services outlined on a student’s IEP.³⁰ Before changing a child’s educational placement as a disciplinary consequence, agencies must also conduct manifestation determination review meetings to determine whether the child’s behavior is a manifestation of his or her disability.³¹

Under federal law, agencies responsible for educating children have an affirmative obligation to identify, locate, and evaluate students with disabilities, also known as the agency’s “child find” obligations.³² The United States Department of Education has explicitly reminded states that the child find provisions of the IDEA apply to children in custody: “It is not sufficient to assume that a student who enters a correctional facility is not a student with a disability simply because he or she has not yet been identified as such.”³³

The IDEA imposes shared obligations on every public agency responsible for educating eligible children with disabilities.³⁴ As a result, both local education agencies and state education agencies must collaborate to ensure the continued provision of education to children in custody—

²² See, e.g., 20 U.S.C. § 6434(a)(2)(B).

²³ *Id.*

²⁴ 34 C.F.R. § 300.2(b)(1)(iv). See also Statement of Interest of the United State at 1, *G.F. v. Contra Costa Cnty.*, 2915 U.S. Dist. LEXIS 159597 (N.D. Cal. 2015); Arne Duncan & Eric H. Holder, Letter to Chief State School Officers and State Attorneys General (June 9, 2014), <https://www2.ed.gov/policy/elsec/guid/secletter/140609.html> (“[W]ith regard to students with disabilities, the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act of 1973, and Title II of the Americans with Disabilities Act of 1990 . . . obligate specific public agencies . . . to provide educational services to eligible youth in confinement.”).

²⁵ See, e.g., 20 U.S.C. § 1400(d)(1)(A).

²⁶ 20 U.S.C. § 1414(d).

²⁷ 34 C.F.R. § 300.2(b)(1)(iv).

²⁸ 34 C.F.R. § 300.323(e).

²⁹ *Id.*; 20 U.S.C. § 1414(d)(4).

³⁰ See 34 C.F.R. § 300.503(a).

³¹ See 34 C.F.R. § 300.530(e).

³² 20 U.S.C. § 1412(a)(3)(A); 34 C.F.R. § 300.111(a)(1)(i).

³³ Dear Colleague Letter, OSEP, 114 L.R.P. 51903 (Dec. 5, 2014), at 11.

³⁴ 34 C.F.R. § 300.2(b)(iv).



whether they are in OJJ’s existing juvenile facilities or the former death row facility at Angola. Although there are a number of exceptions to the IDEA’s coverage for children who are *convicted* as adults, those exceptions do not apply to students who were adjudicated as juveniles and may be moved to an adult facility.³⁵ Ultimately, as the state education agency, the LDE bears responsibility for ensuring that all educational programs for children with disabilities comply with federal law.³⁶

The Educational Needs of Students in OJJ Secure Facilities

The risks of educational neglect and deprivation are high for children in state custody. Without access to meaningful learning opportunities, children in custody are at risk of dropping out of school upon release which will further isolate them from the programs, services, and supportive adults that can help them build ties to their community and establish economic and emotional security.³⁷

Over the past several years, OJJ and the Special School District (SSD) have struggled to provide coordinated general and special education to students at OJJ’s existing facilities. Together, OJJ and SSD are responsible for educating a population of students with an acute need for supportive and individualized education. Students in OJJ secure care facilities are disproportionately students of color, students with disabilities, and students who have experienced trauma.³⁸ OJJ and SSD have frequently neglected their duties to ensure high-quality and individualized learning for all children in custody.

OJJ's Past Failure to Provide Consistent Educational Programming at the Acadiana Center for Youth at St. Martinville Indicates Similar Failures Will Occur at Angola

In the summer of 2021, OJJ secretly opened a new facility, the Acadiana Center for Youth at St. Martinville, with the stated goal of providing a specialized environment to children with severe behavioral and mental health needs.³⁹ Although many of the students placed at St. Martinville were students with disabilities, OJJ and SSD did not provide general or special education

³⁵ 20 U.S.C. § 1414(d)(7).

³⁶ 34 C.F.R. § 300.149(a).

³⁷ See Southern Educ. Found., *Just Learning: The Imperative to Transform Juvenile Justice Systems into Effective Educational Systems*, 18, 27 (2014), <https://tinyurl.com/fvmpw286> (explaining that as many as two thirds of children who leave the juvenile justice system drop out of school).

³⁸ Nationally, up to 77% of students in the juvenile legal system have disabilities, and many students have experienced educational challenges—including grade retention, expulsion, and suspension—before entering the juvenile legal system. See OFF. JUV. JUST. & DELINQ. PREVENTION, *Education for Youth Under Formal Supervision of the Juvenile Justice System*, January 2019 OJJDP MODEL PROGRAMS GUIDE LITERATURE REVIEWS 1, 3-4, <https://ojjdp.ojp.gov/sites/g/files/xyckuh176/files/media/document/education-for-youth-in-the-juvenile-justice-system.pdf>. The vast majority of children in the juvenile justice system nationally, including in Louisiana, are Black. Joshua Rovner, *Disproportionate Minority Contact in the Juvenile Justice System*, SENT’G PROJECT (MAY 1, 2014), <https://www.sentencingproject.org/publications/disproportionate-minority-contact-in-the-juvenile-justice-system/>.

³⁹ Beth Schwartzapel, Erin Einhorn, and Annie Waldman, “No Light, No Nothing.” *Inside Louisiana’s Harshest Juvenile Lockup*, The Marshall Project, <https://www.themarshallproject.org/2022/03/10/no-light-no-nothing-inside-louisiana-s-harshest-juvenile-lockup>.



programming to children at St. Martinville for at least four months.⁴⁰ Like at Angola, the failure to provide education services was due in part to a complete lack of planning prior to moving children to St. Martinville. Prior to transferring children to St. Martinville, OJJ failed to hire and train necessary staff, coordinate with SSD to ensure the seamless provision of special education services or develop a school program of any kind.⁴¹ In some cases, children lived at St. Martinville for several months without attending school for a single day.⁴² OJJ and SSD only began providing educational services to children at St. Martinville after LCCR and the Stuart H. Smith Law Clinic & Center for Social Justice at Loyola University New Orleans College of Law filed a complaint with the Louisiana Department of Education identifying the numerous legal violations caused by OJJ and SSD's conduct.⁴³ This flagrant violation of law demonstrates OJJ's failure to prioritize or plan for the education of children in its facilities, as well as SSD's failure to ensure consistent special education services when children are moved. We are concerned that a similar lack of state planning has occurred prior to the transfer of youth to Angola Penitentiary, and the children currently incarcerated in Angola are not receiving legally required educational services.

OJJ and SSD have struggled to provide consistent schooling to students on a daily basis, both before and after the COVID-19 pandemic. Schools in OJJ's secure care facilities are frequently closed for days, weeks, and even months at a time, leaving students without the rehabilitation and treatment they need to return to their communities successfully.⁴⁴ Because school is canceled so frequently in OJJ facilities, SSD is often unable to provide the special education and related services outlined on students' IEPs, requiring SSD to provide hundreds of hours of compensatory education outside of the regular school day to remedy educational deprivations. OJJ has a legal obligation to provide rehabilitative programming to children in custody,⁴⁵ and education precisely because the "foundation for programming in most juvenile institutions," is "critical to rehabilitation for troubled youth."⁴⁶ Denying students in custody their right to receive general and special education, OJJ and SSD are also denying them the means to succeed upon release.

Thus far, advocates' efforts to work directly with OJJ, LDE, and SSD to resolve these issues have proved unfruitful. For example, although advocates successfully secured a Resolution Agreement with OJJ and SSD regarding the provision of special education at St. Martinville, OJJ and SSD failed to achieve compliance for a period of approximately a year after the execution of the agreement. Rather than remedy substantial noncompliance with the agreement, OJJ informed advocates that it would be "opting out" and "cancel[ing]" the agreement. There is no "opt out" or "cancellation" provision in this binding agreement between the parties.

⁴⁰ *Id.*; see also See Office of Juvenile Justice, *Youth Services Policy: Transitional Treatment Unit (TTU)*, 5 (2021), <https://tinyurl.com/ex2wchw2>.

⁴¹ Schwartzapfel, *supra* note 24.

⁴² See *Youth Services Policy*, *supra* note 25.

⁴³ Schwartzapfel, *supra* note 24.

⁴⁴ See Eleanor Tabone, *Incarcerated Youth Aren't Getting the Education They Need to Live Outside Jail, Experts Worry*, WWLTV, <https://www.wwltv.com/article/news/crime/education-experts-fear-incarcerated-youth-arent-receiving-the-required-education/289-072c75b1-d9c1-403e-87fa-c9182ba701ca>.

⁴⁵ See La. R.S. § 15:906(B).

⁴⁶ *The case for quality education in juvenile correctional facilities*, Nat'l Center on Educ., Disability, and Juv. Just., <http://www.edjj.org/focus/education/#::-:text=Because%20education%20is%20critical%20to%20rehabilitation%20for%20troubled,p%20revention%20of%20delinquency%20and%20the%20reduction%20of%20recidivism..>



Although the LDE engages in regular monitoring of OJJ’s schools, we are concerned that these monitoring efforts also are insufficient to safeguard the educational rights of children in custody. LDE was not aware that OJJ opened St. Martinville without providing education to children for many months,⁴⁷ and the educational disruptions described above have persisted despite regular LDE monitoring. The lack of transparency and planning regarding the transfer of youth to Angola Penitentiary is a repetition of the state’s failures at the St. Martinsville youth facility and will likely result in the same outcome for the youth currently incarcerated in Angola: a lack of consistent and legally mandated educational and rehabilitative programming.

A System in Crisis

The schools in OJJ’s existing facilities are in a moment of crisis. These schools are understaffed,⁴⁸ rank at the very bottom of all schools in the state on school performance metrics,⁴⁹ and are failing to provide students with the credits they need to enroll in schools in their communities upon release.⁵⁰ In addition to the problems plaguing youth detention centers, the Department of Corrections is facing grave staffing shortages that will affect its ability to assist OJJ with developing a functioning and compliant school in Angola.⁵¹ We have serious doubts about the ability of OJJ, DOC, SSD, and LDE to implement a legally-compliant school in Angola.

Although Governor Edwards has stated that children will continue to receive all necessary educational services at Angola, conclusory assurances without detail or substance are simply not enough. As identified above, the students in OJJ custody are at serious risk of educational deprivation and a loss of the special education services and accommodations that will help them grow. The legal rights of these children under state and federal law must be protected and require urgent action.

We urge you to open an investigation into the educational services provided to the youth currently incarcerated in Angola Penitentiary as soon as possible. Federal intervention by the Department of Education is the only action that may ensure children at the deepest end of the juvenile legal system, those in state custody, have the opportunity to succeed in their communities and gain productive and meaningful employment upon release. We appreciate your

⁴⁷ Schwartzapfel, *supra* note 24.

⁴⁸ See, e.g., Kenny Kuhn, *Governor Edwards to Send State Police to Help Staffing Shortage at Two Troubled Youth Centers*, WWL Radio New Orleans, <https://www.msn.com/en-us/news/us/governor-edwards-to-send-state-police-to-help-staffing-shortage-at-two-troubled-youth-centers/ar-AAYBgsG>.

⁴⁹ See *Riverside Alternative High School Report Card: Student Breakdown*, LA. DEP’T OF EDUC., https://louisianaschools.com/schools/A02002/academic-performance/breakdown_student_groups (last visited June 30, 2022); *Central Southwest Alternative High School Report Card: Student Breakdown*, LA. DEP’T OF EDUC., https://louisianaschools.com/schools/A02004/academic-performance/breakdown_student_groups (last visited June 30, 2022); *Southside Alternative High School Report Card: Student Breakdown*, LA. DEP’T OF EDUC., https://louisianaschools.com/schools/A02003/academic-performance/breakdown_student_groups (last visited June 30, 2022).

⁵⁰ See Southern Educ. Found., *Just Learning: The Imperative to Transform Juvenile Justice Systems into Effective Educational Systems* (2014), <https://tinyurl.com/fvmpw286> (finding that just 8% of students in juvenile prisons in Louisiana earn high school course credits during their time in custody).

⁵¹ Paul Braun, *Low Wages, Poor Working Conditions Have Left State Prisons Understaffed, Officials Say*, WWNO, <https://www.wwno.org/2022-03-08/low-wages-poor-working-conditions-have-left-state-prisons-understaffed-officials-say>.



commitment to the core principles of equity and access to education, your commitment to stakeholder engagement, and evidence-based policies, and we stand ready to work with you to protect youth in Louisiana. If you have any questions or would like more information, please contact Nina Patel, Senior Policy Counsel, Decarceration and Criminal Legal System Reform at the Southern Poverty Law Center, at Nina.Patel@splcenter.org.

Sincerely,

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A handwritten signature in cursive script, appearing to read 'Nancy Rosenbloom'.

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Meghan Matt, Staff Attorney
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