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Critical Race Feminism, Health, and Restorative Practices in Schools: Centering the Experiences of Black and Latina Girls

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CRITICAL RACE FEMINISM, HEALTH, AND RESTORATIVE PRACTICES IN SCHOOLS: CENTERING THE EXPERIENCES OF BLACK AND LATINA GIRLS

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ABSTRACT[**]

Restorative practices (RP) in K-12 schools in the United States have grown exponentially since the early 1990s. Developing against a backdrop of systemic racism, RP has become embedded in education practice and policy to counteract the harmful and persistent patterns of disparities in school discipline experienced by students of color. Within this legal, social, and political context, the empirical evidence that has been gathered on school-based restorative justice has framed and named RP as a behavioral intervention aimed at reducing discipline incidents—that is, an "alternative" to punitive and exclusionary practices. While this view of RP is central to dismantling discriminatory systems, we argue it reflects an unnecessarily limited understanding of its potential and has generated unintended consequences in the field of RP research. First, the reactive RP model of analysis focuses more exclusively on behavioral change, rather than systemic improvement, to address discipline disparities. Second, RP research has insufficiently examined the potential role of RP in achieving health justice. Third, RP research too rarely engages in intersectional analyses that critically examine gendered racism. This study is intended as a course correction. Building on the work of legal scholars, public health researchers, sociologists, restorative justice practitioners, and our own prior work, this original study is the first to examine non-disciplinary RP through a critical race feminist lens, and—just as importantly—a public health praxis. Our findings reveal that the interplay between RP and adolescent health, race, and gender can no longer be overlooked. Proactive non-disciplinary RP was found to promote supportive school environments that enhance five key protective health factors for Black and Latina girls. Additionally, results indicate that RP improved the mental health and wellbeing of Black and Latina girls, building fundamental resilience skills that can help overcome

the complex array of social structures that serve to disempower and disenfranchise girls and harm their educational and health outcomes.

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INTRODUCTION

For decades, civil rights and education justice reformists have sought to address structural discrimination and bias[1] as fundamental drivers of

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1. KIMBERLÉ WILLIAMS CRENSHAW, PRISCILLA OCEN & JYOTI NANDA, COLUM. L. SCH. CTR. FOR INTERSECTIONALITY & SOC. POL'Y STUD. & AFR. AM. POL'Y F., BLACK GIRLS MATTER: PUSHED OUT, OVERPOLICED AND UNDERPROTECTED 16-18 (2015); CHERYL STAATS, KIRWAN INST., IMPLICIT RACIAL BIAS AND SCHOOL DISCIPLINE DISPARITIES: EXPLORING THE CONNECTION 4-8 (2014); REBECCA EPSTEIN, JAMILIA J. BLAKE & THALIA GONZÁLEZ, GEO. L. CTR. ON POVERTY & INEQ., GIRLHOOD INTERRUPTED: THE ERASURE OF BLACK GIRLS' CHILDHOOD 9-11 (2017) [hereinafter EPSTEIN ET AL.]; Jamilia J. Blake, Bettie Ray Butler, Chance W. Lewis & Alicia Darensbourg, *Unmasking the Inequitable Discipline Experiences of Urban Black Girls: Implications for Urban Educational Stakeholders*, 43 URB. REV. 90 (2011); Jamilia J. Blake, Verna M. Keith, Wen

education laws and policies that serve to police, punish, and exclude students with intersectional identities.[2] Racial and gender inequities in school discipline and policing practices have been clearly established, dating back to this country's earliest days[3] and continuing today,[4] with anti-Blackness and racism at their core. In 1975, extensive research by the Children's Defense Fund (CDF) found that Black students experienced

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Luo, Huong Le & Phia Salter, *The Role of Colorism in Explaining African American Females' Suspension Risk*, 32 SCH. PSYCH. Q. 118, 118-30 (2017) [hereinafter Blake et al., *The Role of Colorism*]; Jamilia J. Blake, Bettie Ray Butler & Danielle Smith, *Challenging Middle-Class Notions of Femininity: The Cause of Black Females' Disproportionate Suspension Rates, in* CLOSING THE SCHOOL DISCIPLINE GAP 75, 76 (Daniel J. Losen ed., 2015); Subini Ancy Annamma, Yolanda Anyon, Nicole M. Joseph, Jordan Farrar, Eldridge Greer, Barbara Downing & John Simmons, *Black Girls and School Discipline: The Complexities of Being Overrepresented and Understudied*, 54 URB. EDUC. 211 (2019) [hereinafter Annamma et al.]; MONIQUE W. MORRIS, PUSHOUT: THE CRIMINALIZATION OF BLACK GIRLS IN SCHOOLS 34, 2016; NATHAN BARRETT, ANDREW MCEACHIN, JONATHAN N. MILLS & JON VALANT, EDUC. RSCH. ALL. FOR NEW ORLEANS, DISPARITIES IN STUDENT DISCIPLINE BY RACE AND FAMILY INCOME, 30-32 (2017); SETH GERSHENSON & THOMAS S. DEE, BROOKINGS INST., THE INSIDIOUSNESS OF UNCONSCIOUS BIAS IN SCHOOLS (2017), [https://perma.cc/22WH-CFZK]; Russell J. Skiba, Robert H. Horner, Choong-Geun Chung, M. Karega Rausch, Seth L. May & Tary Tobin, *Race Is Not Neutral: A National Investigation of African American and Latino Disproportionality in School Discipline*, 40 SCH. PSYCH. REV. 85, 85-89 (2011) [hereinafter Skiba et al., *Race Is Not Neutral*]; AJMEL QUERESHI & JASON OKONOFUA, THURGOOD MARSHALL INST., LOCKED OUT OF THE CLASSROOM: HOW IMPLICIT BIAS CONTRIBUTES TO DISPARITIES IN SCHOOL DISCIPLINE 4-6 (2017); Jason P. Nance, *Student Surveillance, Racial Inequalities, and Implicit Racial Bias*, 66 EMORY L.J. 765, 784-95 (2017).

2. The collateral consequences of school discipline and policing is well established, including its centrality in the school-to-prison pipeline. Elana Needle, *National Racial Justice Coalition Renews Demand that Schools Address Racial Disparities in Discipline and that OCR, U.S. Department of Education, Enforce Laws Prohibiting Discrimination in Student Discipline*, ADVANCEMENT PROJECT (Aug. 5, 2019), [https://perma.cc/BZM5-3AHC]; DANIEL J. LOSEN & AMIR WHITAKER, CTR. FOR CIV. RTS. REMEDIES & AM. C.L. UNION S. CAL., 11 MILLION DAYS LOST: RACE, DISCIPLINE, AND SAFETY AT U.S. PUBLIC SCHOOLS, 5, 10-12 (2018); ADVANCEMENT PROJECT, EDUCATION ON LOCKDOWN: THE SCHOOLHOUSE TO JAILHOUSE TRACK, 15-16, 24 (2005); DSC FACT SHEETS ON SCHOOL PUSHOUT, DIGNITY IN SCHOOLS (2017), [https://perma.cc/D8NV-4NMC]; *Reducing Student and Teacher Dropout Rates in Mississippi*, S. POVERTY L. CTR. (Apr. 1, 2008), [https://perma.cc/M55A-RY9E].

3. *See, e.g.*, Michael J. Dumas, *Against the Dark: Antiblackness in Education Policy and Discourse*, 55 THEORY INTO PRAC. 11, 16 (2016); Steven L. Nelson & Ray Orlando Williams, *From Slave Codes to Educational Racism: Urban Education Policy in the United States as the Dispossession, Containment, Dehumanization, and Disenfranchisement of Black Peoples*, 19 J.L. SOC'Y 82, 85 (2019); Connie Wun, *Against Captivity: Black Girls and School Discipline Policies in the Afterlife of Slavery*, 30 EDUC. POL'Y 171, 173, 179 (2016).

4. CHILD.'S DEF. FUND, SCHOOL SUSPENSIONS: ARE THEY HELPING CHILDREN?, WASH. RSCH. PROJECT, INC. 6, 63-75 (1975).

educational conditions marked by "a pervasive school intolerance for children who are different"[5]; contemporary research and data document continuous, clear, and persistent patterns of systematic racialized and gendered discipline disparities.[6]

A range of responses have emerged to address education inequality resulting from the disparate use and impact of disciplinary practices in K-12 schools. This Article specifically focuses on a principal intervention in law, policy, and practice: school-based restorative justice.[7] First introduced in educational systems in the 1990s, restorative justice has not only been increasingly adopted in practice, but has been formalized

5. *Id.* at 22.

6. *See* Am. Psych. Ass'n Zero Tolerance Task Force, *Are Zero Tolerance Policies Effective in the Schools?: An Evidentiary Review and Recommendations*, 63 AM. PSYCH. 852 (2008); Yolanda Anyon, Chalane Lechuga, Debora Ortega, Barbara Downing, Eldridge Greer & John Simmons, *An Exploration of the Relationships Between Student Racial Background and the School Sub-Contexts of Office Discipline Referrals: A Critical Race Theory Analysis,* 21 RACE, ETHNICITY & EDUC. (2018); Yolanda Anyon, Jeffrey M. Jenson, Inna Altschul, Jordan Farrar, Jeanette McQueen, Eldridge Greer, Barbara Downing & John Simmons, *The Persistent Effect of Race and the Promise of Alternatives to Suspension in School Discipline Outcomes*, 44 CHILD. & YOUTH SERVS. REV. 379 (2014); Russell J. Skiba, Choong-Geun Chung, Megan Trachok, Timberly L. Baker, Adam Sheya & Robin L. Hughes, *Parsing Disciplinary Disproportionality: Contributions of Infraction, Student, and School Characteristics to Out-of-School Suspension and Expulsion*, 51 AM. EDUC. RSCH. J. 640 (2014); Skiba et al., Race Is Not Neutral, *supra* note 1, at 85. Analysis of the most recent CRDC data, for example, shows that Black girls are 4.19 times more likely to be suspended and 3.66 times more likely to be arrested at school. GEO. L. CTR. ON POVERTY AND INEQ., DATA SNAPSHOT: 2017-2018 NATIONAL DATA ON SCHOOL DISCIPLINE BY RACE AND GENDER (2020). Students with disabilities continue to experience higher rates across all categories of discipline and policing (e.g., suspension, expulsion, referrals to law enforcement, and school-based arrests) than their non-disabled peers. Disaggregation of data by gender reveals that Black girls with disabilities represent the most significantly impacted student population—they are five times more likely to be suspended than their white, non-disabled female students. U.S. DEP'T EDUC. OFF. C.R, CIVIL RIGHTS DATA COLLECTION, (2020) https://ocrdata.ed.gov/.

7. Thalia González, *Restorative Justice from the Margins to the Center: The Emergence of a New Norm in School Discipline*, 60 HOW. L.J. 268, 285-95 (2016); Thalia González, Rebecca Epstein, Claire Krelitz & Rhea Shinde, *Restorative Justice, School Reopenings, and Educational Equity: A Contemporary Mapping and Analysis of State Law*, 55 U.C. DAVIS L. REV. 43, 45-63 (2021); Barbara Katic, Laura A. Alba & Austin H. Johnson, *A Systemic Evaluation of Restorative Justice Practices: School Violence Prevention and Response*, 19 J. SCH. VIOLENCE 4, 10-11 (2020); Adriaan Lanni, *Taking Restorative Justice Seriously*, 69 BUFF. L. REV. 635, 651-654, 668 (2021); Shannon M. Sliva & Carolyn G. Lambert, *Restorative Justice Legislation in the American States: A Statutory Analysis of Emerging Legal Doctrine*, 14 J. POL'Y PRAC. 77, 80, 88-90 (2015).

in school and district policies and codified into state law.[8] While core principles guide the application of restorative practices (RP) in schools, there is no single, universal definition. A survey of the existing literature shows that multiple terms are used to refer to RP in schools, including restorative interventions,[9] restorative practices,[10] restorative measures,[11] restorative approaches,[12] restorative discipline,[13] and restorative justice.[14] The variances in these terms reflect the wide spectrum of scholarly and disciplinary approaches to RP, as well as RP's association with other school policies and practices.

The implementation, e.g., form and function, of school-based RP falls primarily into three main categories: proactive, reactive, or integrated (whole-school).[15] The central aims of proactive RP are developing

8. González, *supra* note 7, at 268-280. *See also* Ernesto Lodi, Lucrezia Perrella, Gian Luigi Lepri, Maria Luisa Scarpa & Patrizia Patrizi, *Use of Restorative Justice and Restorative Practices at School: A Systematic Literature Review*, 19 INT'L. J. ENV'T. RSCH. & PUB. HEALTH 96 (2022) (a meta-analysis of school-based restorative justice studies from 2010-2021).
9. Yolanda Anyon, Anne Gregory, Susan Stone, Jordan Farrar, Jeffrey M. Jenson, Jeanette McQueen, Barbara Downing, Eldridge Greer & John Simmons, *Restorative Interventions and School Discipline Sanctions in a Large Urban School District*, 53 AM. EDUC. RSCH. J. 1663 (2016).
10. ANNE GREGORY & KATHERINE R. EVANS, NAT'L EDUC. POL'Y CTR., THE STARTS AND STUMBLES OF RESTORATIVE JUSTICE IN EDUCATION: WHERE DO WE GO FROM HERE?, 3 (2020); SONIA JAIN, HENRISSA BASSEY, MARTHA A. BROWN & PREETY KALRA, OAKLAND UNIFIED SCH. DIST., RESTORATIVE JUSTICE IN OAKLAND SCHOOLS: IMPLEMENTATION AND IMPACTS, 53-57 (2014) [hereinafter JAIN ET AL.]; JON KIDDE, VT. AGENCY EDUC., WHOLE-SCHOOL RESTORATIVE APPROACH RESOURCE GUIDE 4 (2017); Ann Schumacher, *Talking Circles for Adolescent Girls in an Urban High School: A Restorative Practices Program for Building Friendships and Developing Emotional Literacy Skills*, SAGEOPEN (2014).
11. *Restorative Practices*, MINN. DEP'T EDUC., [https://perma.cc/5J6T-E4MM] (last visited Oct. 29 2022).
12. Thalia González, Heather Sattler & Annalise J. Buth, *New Directions in Whole-School Restorative Justice Implementation*, 36 CONFLICT RESOL. Q. 207 (2019).
13. *See* LORRAINE STUTZMAN AMSTUTZ & JUDY H. MULLET, THE LITTLE BOOK OF RESTORATIVE DISCIPLINE FOR SCHOOLS: TEACHING RESPONSIBILITY; CREATING CARING CLIMATES (2014); Marilyn Armour, *Restorative Practices: Righting the Wrongs of Exclusionary School Discipline*, 50 U. RICH. L. REV. 999, 1034 (2016) (discussing the history of restorative justice in schools in relationship to zero tolerance and presenting contemporary case studies in Texas).
14. *See* TREVOR FRONIUS, SEAN DARLING-HAMMOND, HANNAH PERSSON, SARAH GUCKENBURG, NANCY HURLEY & ANTHONY PETROSINO, WESTED JUST. & PREVENTION RSCH. CTR., RESTORATIVE JUSTICE IN U.S. SCHOOLS: AN UPDATED RESEARCH REVIEW (2019); GREGORY & EVANS, *supra* note 10, at 3.
15. FRONIUS ET AL., *supra* note 14, at 1-3; GREGORY & EVANS, *supra* note 10, at 3; GONZÁLEZ ET AL., *supra* note 12, at 208-09; Lydia Nussbaum, *Realizing Restorative*

relationships, community building, social-emotional learning, and empowerment and resilience skill-building.[16] Reactive RP is principally focused on remediating harm and restoring relationships in response to incidents of harm or breaches of community norms.[17] Integrated and whole-school RP models are implemented as multi-tiered systems of interventions[18] that include both proactive and reactive practices to support a relational ecology.[19] The objective of whole-school approaches is to dismantle authoritarian cultures and construct in its place a "culture of high expectations with high levels of support that emphasizes doing things 'with' someone as opposed to doing things 'to' or 'for' someone."[20] As school-based RP has gained prominence in education law, policy, and practice, scholars and practitioners have called for development of race-conscious, resilience-building strategies and resistance to reinforcing matrices of oppression.[21]

The framing and naming[22] of RP as an "alternative" to punitive and exclusionary discipline has shaped the current literature in several ways, most significantly by focusing on RP as a behavioral intervention that is reactive, aimed at reducing discipline incidents and a replacement

Justice: Legal Rules and Standards for School Discipline Reform, 69 HASTINGS L.J. 583 (2018).

16. González et al., *supra* note 12.
17. *See, e.g.*, Armour, *supra* note 13. This is in contrast to proactive RP which are applied before a specific harm or breach of the community norms has occurred. *See, e.g.*, Schumacher, *supra* note 10.
18. Armour, *supra* note 13, at 1017; KIDDE, supra note 10; Brenda E. Morrison & Dorothy Vaandering, *Restorative Justice: Pedagogy, Praxis, and Discipline*, 11 J. SCH. VIOLENCE 138, 144-45 (2012).
19. *See, e.g.*, González et al., *supra* note 12, at 209; GREGORY & EVANS, *supra* note 10, at 3.
20. Armour, *supra* note 13, at 1017.
21. *See* GREGORY & EVANS, *supra* note 10, at 3; David Knight & Anita Wadhwa, *Expanding Opportunity Through Critical Restorative Justice: Portraits of Resilience at the Individual and School Level*, 11 SCH.: STUD. EDUC. 11, 14-16 (2014); *see also* TALAYA L. TOLEFREE, KOINONIA LEADERSHIP ACADEMY, A COMPREHENSIVE APPROACH FOR IMPLEMENTING SCHOOL-BASED RESTORATIVE PRACTICES: RESTORATIVE PRACTICES PILOT SITE: UPPER MIDWEST URBAN ELEMENTARY SCHOOL PRE-K-5 19 (2017).
22. Sociolegal scholars have long examined the role of framing and naming in social movements. *See, e.g.*, Robert D. Benford & David A. Snow, *Framing Processes and Social Movements: An Overview and Assessment*, 26 ANN. REV. SOC., 611, 614, 631 (2000). A parallel body of literature exists in political science that studies the relationship of beliefs, attitudes, political behaviors, and even voting patterns. *See, e.g.*, Hannah E. Brown, *Racialized Conflict and Policy Spillover Effects: The Role of Race in the Contemporary U.S. Welfare State*, 119 AM. J. SOC. 400-01 (2013); Micah English & Joshua L. Kalla, *Racial Equality Frames and Public Policy Support: Survey Experimental Evidence,* OSF 2-4, 6 (2021).

for punitive and exclusionary practices.[23] Studies of RP in this context—which have taken several forms, including randomized controlled trials,[24] qualitative analyses,[25] and single group design[26]—have demonstrated positive outcomes across a host of indicators, but they have consistently contextualized RP as nested within and adjacent to school discipline, racial justice, and civil rights. This framing is essential to dismantling highly harmful learning structures and environments[27] that perpetuate structural race discrimination, but it has also generated a host

23. MARYLIN ARMOUR, THE INST. RESTORATIVE JUST. AND RESTORATIVE JUST. DIALOGUE, ED WHITE MIDDLE SCHOOL RESTORATIVE DISCIPLINE EVALUATION: IMPLEMENTATION AND IMPACT, 2014/2015 SIXTH, SEVENTH & EIGHTH GRADES, 22-28 (2015); CATHERINE H. AUGUSTINE, JOHN ENGBERG, GEOFFREY E. GRIMM, EMMA LEE, ELAINE LIN WANG, KAREN CHRISTIANSON & ANDREA A. JOSEPH, RAND CORP., CAN RESTORATIVE PRACTICES IMPROVE SCHOOL CLIMATE AND CURB SUSPENSIONS? AN EVALUATION OF THE IMPACT OF RESTORATIVE PRACTICES IN A MID-SIZED URBAN SCHOOL DISTRICT 2, 47-60 (2018); Paul Gregory Carroll, *Evaluating Attempts at the Implementation of Restorative Justice in Three Alternative Education High Schools*, PROQUEST 1, 1-12 (2017); Anne Gregory, Francis L. Huang, Yolanda Anyon & Eldridge Greer, *An Examination of Restorative Interventions and Racial Equity in Out-of-School Suspensions*, 47(2) SCH. PSYCH. REV. 167-82 (2018); Mara Schiff, *Can restorative justice disrupt the 'school-to-prison pipeline'*, 21(2) CONTEMP. JUST. REV. 121, 121-39 (2018); Ayesha K. Hashim, Katharine O. Strunk & Tasminda K. Dhaliwal, *Justice for all? Suspension Bans and Restorative Justice Programs in the Los Angeles Unified School District,* 93 PEABODY J. EDUC. 174, 174-89 (2018); Thalia González, *Keeping Kids in Schools: Restorative Justice, Punitive Discipline, and the School to Prison Pipeline*, 41 J. L. & EDUC. 281 (2012); González, *supra* note 7.

24. Joie Acosta, Matthew Chinman, Patricia Ebener, Patrick S. Malone, Andrea Phillips & Asa Wilks, *Evaluation of a Whole-School Change Intervention: Findings from a Two-Year Cluster-Randomized Trial of the Restorative Practices Intervention*, 48 J. YOUTH ADOLESC. 876 (2019); AUGUSTINE ET AL., *supra* note 23, at 9; Amy E. Green, Cathleen E. Willging, Kim Zamarin, Layla M. Dehaiman & Patricia Ruiloba, *Cultivating Healing by Implementing Restorative Practices for Youth: Protocol for a Cluster Randomized Trial*, 93 INT. J. EDUC. RES., 168 (2019).

25. Hsiu-Fang Hsieh & Sarah E. Shannon, *Three Approaches to Qualitative Content Analysis,* 15 QUALITATIVE HEALTH RSCH. 1277, 1278 (2005); John B. Gates, *Content Analysis: Possibilities and Limits for Qualitative Data,* 73 JUDICATURE 202, 202–03 (1990); Jung Jin Choi, Diane L. Green & Michael J. Gilbert, *Putting a Human Face on Crimes: A Qualitative Study on Restorative Justice Processes for Youths*, 28 CHILD & ADOLESC. SOC. WORK J., 336, 351 (2011).

26. FRONIUS ET AL., *supra* note 14, at 21-32; Bailey Maryfield, Roger Przybylski & Mark Myrent, *Research on Restorative Justice Practices*, JUST. RSCH. STATS. ASS'N, 1, 5 (2020).

27. Brenda E. Morrison & Vaandering, *Restorative Justice: Pedagogy, Praxis, and Discipline* 11 J. SCH. VIOLENCE 138, at 144-45 (2012); Pamela Cantor, David Osher, Juliette Berg, Lily Steyer & Todd Rose, *Malleability, Plasticity, and Individuality: How Children Learn and Develop in Context*, 23 APPLIED DEVELOPMENTAL SCI. 307, 311 (2019); Cathy Smeltzer Erb & Peyton Erb, *Making Amends: A Restorative Justice Approach to Classroom Behavior*, 11 TCHR. EDUCATORS' J. 95, 96 (2018).

of unintended consequences. Using original empirical research on the experiences and perceptions of Black and Latina girls with school-based RP, we focus on the need to construct more proactive, inclusive frameworks of RP to counteract an understanding of RP as predominantly reactive.

I. THE REACTIVE FRAME OF RESTORATIVE JUSTICE

The dominant understanding of RP, as discussed by legal scholars and racial justice advocates, exists in the context of a civil-rights and racial-justice responses to zero-tolerance policies, the school-to-prison pipeline, and pernicious effects of discipline and policing.[28] Policymakers and lay people alike define RP as an intervention that produces student-level behavioral and structural change.[29] Under this framing,[30] the role of RP is to remediate harm caused by disciplinary infractions, change the behaviors of individuals and, to some extent, communities.[31] This is evidenced by the language of school policies and state law. As shown by an empirical analysis of the codification of restorative justice in-

28. Thalia González & Emma Kaeser, *School Police Reform: A Public Health Imperative*, 74 SMU L. REV. F. 118, 125-29 (2021); Samantha Kobbah, *Why Exclusionary School Discipline Practices are a Civil Rights Issue*, EDUC. TRUST (Apr. 11, 2018), [https://perma.cc/627D-NRP3]; Fania Davis, *How schools are using restorative justice to remedy racial disparities in discipline*, SALON (Apr. 21. 2019), [https://perma.cc/H9SC-B9UX]; FANIA E. DAVIS, THE LITTLE BOOK OF RACE AND RESTORATIVE JUSTICE, BLACK LIVES, HEALING, AND US SOCIAL TRANSFORMATION 1, 1-120 (2019).

29. Lodi et al., *supra* note 8; Thomas G. Ryan & Sean Ruddy, *Restorative Justice: a Changing Community Response*, 7 INT'L ELEC. J. ELEMENTARY EDUC. 253, 258-59 (2015); Jeffrey M. Pavlacic, Karen Kate Kellum & Stefan E. Schulenberg, *Advocating for the Use of Restorative Justice Practices: Examining the Overlap between Restorative Justice and Behavior Analysis*, ASS'N BEHAV. ANALYSIS INT'L 4 (2021); Glenn Rideout, Roland Karen, Geri Salinitri & Frey Marc, *Measuring the Impact of Restorative Justice Practices: Outcomes and Contexts*, 21 J. EDUC. ADMIN. FOUND. 35, 55-56 (2010); Alia Nahra & Hernandez D. Stroud, *There is No One Answer to Over-Policing and Mass Incarceration—There are Many*, BRENNAN CTR. JUST. (Nov. 15, 2021), [https://perma.cc/7WXP-YZ9H]; Amanda Alexander & Danielle Sered, *Making Communities Safe, Without the Police*, BOSTON REV. (Nov. 1, 2021), [https://perma.cc/3KDC-5BYS].

30. Dennis Chong & James N. Druckman, *Framing Theory*, 10 ANN. REV. POL. SCI., 104 (2007) ("Framing refers to the process by which people develop a particular conceptualization of an issue or reorient their thinking about an issue [and] [a] frame in communication can be defined only in relation to a specific issue, event, or political actor.").

31. Davis, *supra* note 28; FRONIUS ET AL., *supra* note 14, at 1; Skiba et al., *supra* note 1, at 85–89.

to state education law, RP is implemented with greatest frequency in the context of school discipline and remedying disciplinary disparities.[32] This has generated conceptual analyses and an empirical record that predominantly view RP as an "alternative" to punitive discipline and a "fix" for student behavioral issues.

This construction, whether in research, policy advocacy, or state law, is unnecessarily limited, overlooking the growth of integrated proactive and reactive whole-school models[33] and a burgeoning movement toward more critical approaches to RP[34] that can improve the health of vulnerable adolescents.[35] It also implicitly and explicitly reinforces a deficit-based model of youth development,[36] which focuses on students' flaws or inabilities rather than approaching youth development by asking "what a student can do: their strengths, skills, talents, interests, and competencies."[37] For example, if a student underachieves, a deficit model assumes that a lack of effort is the cause, blaming the student rather than examining the role that school context or other externalities, such as trauma or adversity, might be playing.[38] So, unlike deficit-based approaches, which do not critically examine the system's flaws, such as the reinforcement of principles of white supremacy, anti-Blackness, settler

32. Of the 38 identified laws, 16 associate restorative justice with school discipline. This is true even in Maine and Maryland, both of which support whole-school models. *See* González et al., *supra* note 7, at 52-55.

33. Thalia González, Heather Sattler & Annalise J. Buth, *New Directions in Whole-School Restorative Justice Implementation,* 35 CONFLICT RES. Q. 1 (2018); Martha Brown, *Being Heard: How a Listening Culture Supports the Implementation of Schoolwide Restorative Practices*, 5 RESTORATIVE JUST.: INT'L J., 53, 53-69 (2017); KIDDE, *supra* note 10, at 4; Knight & Wadhwa, *supra* note 21, at 14-16.

34. DAVIS, *supra* note 28; Mika Dashman, Katherine (Kat) Culberg, David Dean, Anna Lemler, Mikhail Lyubanksky & Julie Shackford-Bradley, *Bringing a Racial Justice Consciousness to the Restorative Justice Movement: A Call to White Practitioners*; LISTENING TO THE MOVEMENT: ESSAYS ON NEW GROWTH AND NEW CHALLENGES IN RESTORATIVE JUSTICE (Ted Lewis & Carl Stauffer eds., 2015).

35. THALIA GONZÁLEZ & REBECCA EPSTEIN, INCREASING SCHOOL CONNECTEDNESS FOR GIRLS: RESTORATIVE JUSTICE AS A HEALTH EQUITY RESOURCE, GEORGETOWN L. CTR. POVERTY & INEQ., 10-12 (2020).

36. Shannon Renkly & Katherine Bertolini, *Shifting the Paradigm from Deficit-oriented Schools to Asset Based Models: Why Leaders Need to Promote Asset Orientation in Our Schools*, 2 EMPOWERMENT RSCH. EDUCATORS, 23, 23-27 (2018).

37. *Id.*

38. As researchers and advocates with more than two decades of experience, we have observed the application, and impact of, deficit models in educational communities. *See also*, AN ASSET-BASED APPROACH TO EDUCATION: WHAT IT IS AND WHY IT MATTERS, NYU STEINHARDT (2018), [https://perma.cc/9KKR-PF2D] (a brief explanation of asset-based approaches in education and equity).

colonialism,[39] and social control, asset-based models challenge assumptions that blame students and recognize their "untapped strengths."[40] Asset-based approaches can thus operate to recenter the education system as the failed actor, rather than faulting those harmed by the system.

The importation of a deficit-based model into school-based RP research risks deepening social constructs, assumptions, and tropes that cause unique harm to girls of color. This is particularly acute for Black girls, whose lives exist at the intersection of multiple axes of oppression[41] and, as such, are at high risk of disconnection and disengagement from school.[42] For example, marginalized girls can become detached from school by institutional bias, including the disproportionate use of punitive

39. Settler colonialism is employed by a broad range of scholarly disciplines, including law, to understand the "three foundational processes upon which the United States was built—Indigenous elimination, anti-Black racism, and immigrant exploitation…. [I]n other words, a settler colonialism framework acknowledges the endurance of three ongoing 'strategies of colonization' that continue to maintain settler colonialism's structure of invasion: 1) strategies of elimination targeting Indigenous peoples; 2) strategies of subjugation targeting Black people (anti-Black racism); and 3) strategies of exploitation and exclusion targeting immigrants of color." Monika Batra Kashyap, *U.S. Settler Colonialism, White Supremacy, and the Racially Disparate Impacts of COVID-19*, 11 CALIF. L. REV. ONLINE 517, 518-19 (2020).

40. Lois Weiner, *Challenging Deficit Thinking*, 64 EDUC. LEADERSHIP, 70 (2006).

41. For Black girls, intersectionality is not simply a theoretical tool for analyzing power, systemic harm, and injustice in a specific system or time, but essential as elevating their erasure as both children and adults. Stewart M. Coles & Josh Pasek, *Intersectional Invisibility Revisited: How Group Prototypes Lead to the Erasure and Exclusion of Black Women*, TRANSLATIONAL ISSUES PSYCH. SCI. 1-11 (2020) (examining how Black women are rendered invisible by associations with race over gender and undifferentiation from Black men); EPSTEIN ET AL., *supra* note 1 (investigating how adultification alters Black girls beginning as early as age 5).

42. MONIQUE W. MORRIS, *supra* note 1, at 34; EPSTEIN ET AL., *supra* note 1, at 9-11; Traci Baxley, *Classroom Inequity and the Literacy Experiences of Black Adolescent Girls*, *in* GLOBALIZATION EDUC. SOC. JUST. 145–59 (2010); Dorinda J. Carter Andrews, Tashal Brown, Eliana Castro & Effat Id-Deen, *The Impossibility of Being "Perfect and White": Black Girls' Racialized and Gendered Schooling Experiences*, 56 AM. EDUC. RSCH. J. 2537, 2563 (2019); Thedamarie Gibbs Grey & Lisa Harrison, *Call Me Worthy: Utilizing Storytelling to Reclaim Narratives about Black Middle School Girls Experiencing Inequitable School Discipline,* 53 EQUITY & EXCELLENCE EDUC. 325-41 (2020); KIMBERLÉ CRENSHAW, PRISCILLA OCEN & JYOTI NANDA, BLACK GIRLS MATTER: PUSHED OUT, OVERPOLICED AND UNDERPROTECTED, AFR. AM. POL'Y F., 8 (2015); LETICIA SMITH-EVANS & JANEL GEORGE, NAACP LEGAL DEF. FUND & NAT'L WOMEN'S L. CTR., UNLOCKING OPPORTUNITY FOR AFRICAN AMERICAN GIRLS: A CALL TO ACTION FOR EDUCATIONAL EQUITY 1 (2014); Edward W. Morris, *"Ladies" or "Loudies"? Perceptions and Experiences of Black Girls in Classrooms*, 38 YOUTH & SOC'Y 490 (2007).

discipline,[43] educators' expectations that undermine students' sense of potential academic success,[44] and teachers' comparative lack of attention to students of color.[45] Bias also can influence teachers' punitive responses to girls who have experienced trauma. As research indicates, though girls report a higher prevalence of childhood trauma, the symptoms they express tend to receive less attention from teachers than the symptoms boys express.[46]

Girls of color are also penalized by rules based on race and gender normativity, and, for Black girls, harmful stereotypes—that portray them as angry, aggressive, and hypersexualized—exacerbate the biases they face.[47] Black girls are cast as defiant[48] or promiscuous[49] and disci-

43. Data collected by the U.S. Department of Education's Office for Civil Rights shows that almost all girls of color were at a greater risk of all categories of discipline than white girls in the 2017-2018 school year. REBECCA EPSTEIN, ERIN GODFREY, THALIA GONZÁLEZ & SHABNAM JAVDANI, GEO. L. CTR. ON POVERTY & INEQ., DATA SNAPSHOT: 2017-2018: NATIONAL DATA ON SCHOOL DISCIPLINE BY RACE AND GENDER (2020).

44. ADAKU ONYEKA-CRAWFORD, KAYLA PATRICK & NEENA CHAUDHRY, NAT'L WOMEN'S L. CTR., LET HER LEARN: STOPPING SCHOOL PUSHOUT FOR GIRLS OF COLOR (2017). *See also* SMITH-EVANS & GEORGE, *supra* note 42, at 1; Edward W. Morris, *supra* note 42.

45. Joanne Deak, *How Girls Thrive: An Essential Guide for Educators (And Parents)* (1998), *cited in* CAROLINE ERISMAN, WHERE THE BOYS AREN'T: THE POWER OF AN ALL-GIRLS EDUCATION, WBUR (July 22, 2014); Rebecca Bigler, Amy Roberson Hayes & Veronica Hamilton, *The Role of Schools in the Early Socialization of Gender Differences*, ENCYCLOPEDIA ON EARLY CHILDHOOD DEV. (Dec. 2013); Cecilia L. Ridgeway & Shelley J. Correll, *Unpacking the Gender System: A Theoretical Perspective on Gender Beliefs and Social Relations*, 18 GENDER & SOC'Y 510, 519 (2004). *See also* Diane Schwendenman, *Gender Role Expectations of Classroom Teachers*, Ph.D. dissertation, University of Dayton (2012); Sian L. Beilock, Elizabeth A. Gunderson, Gerardo Ramirez & Susan C. Levine, *Female Teachers' Math Anxiety Affects Girls' Math Achievement*, 107 PROC. NAT'L ACAD. SCIS. 1860 (2010); Feyza Erdena & Charles H. Wolfgang, *An Exploration of the Differences in Pre-Kindergarten, Kindergarten and First Grade Teachers' Beliefs Related to Discipline when Dealing with Male and Female Students*, 174 EARLY CHILD DEV. & CARE 3 (2003); Rebecca S. Bigler, *The Role of Classification Skill in Moderating Environmental Influences on Children's Gender Stereotyping: A Study of the Functional Use of Gender in the Classroom*, 66 CHILD DEV. 1072 (1995).

46. Allison A. Friedrich, Linda M. Raffaele Mendez & Stephanie T. Mihalas, *Gender as a Factor in School-Based Mental Health Service Delivery*, 39 SCH. PSYCH. REV. 122 (2010).

47. EPSTEIN ET AL., *supra* note 1.

48. *See, e.g.*, Blake et al., *The Role of Colorism*, *supra* note 1, at 90-106; Edward W. Morris, *supra* note 42, at 490-515.

49. Cynthia Godsoe, *Contempt, Status, and the Criminalization of Non-Conforming Girls*, 35 CARDOZO L. REV. 1091, 1091 (2014); Francine T. Sherman, *Justice for Girls: Are We Making Progress?*, 59 UCLA L. REV. 1584 (2012).

plined for infractions that are "largely based on school officials' interpretations of behavior,"[50] including behavior deemed as "violat[ing] gender norms of obedience and sexual purity,"[51] such as "disobedience," "disruptive behavior," and "dress code violations."[52] Black girls are also uniquely subjected to adultification bias, which holds them to a higher standard than their white peers.[53] The first empirical study of adultification bias against Black girls found that when compared to white girls, adults tend to perceive Black girls as more adult, as needing less protection or nurturing, and as more knowledgeable about sex, beginning as early as age five.[54] In a follow-up national qualitative evaluation of Black women and girls ranging from age twelve to sixty, it was found that adultification bias was normalized and near universal and perceived to be linked to harsher treatment in school.[55]

II. INTERSECTIONAL ANALYSES AND SCHOOL-BASED RESTORATIVE JUSTICE

In contrast to other fields—including law,[56] criminology,[57] political science,[58] and public health[59]—that have drawn attention to the im-

50. Edward W. Morris & Brea L. Perry, *Girls Behaving Badly? Race, Gender, and Subjective Evaluation in the Discipline of African American Girls*, 90 SOC. EDUC. 127, 144 (2017). *See also* Blake et al., *The Role of Colorism*, *supra* note 1, at 100; Subini Ancy Annamma, Tamara Handy, Amanda L. Miller & Elizabeth Jackson, *Animating Discipline Disparities Through Debilitating Practices: Girls of Color and Inequitable Classroom Interactions,* 122 TCHRS. COLL. REC., no. 5, May 2020, at 1 (2020).

51. Godsoe, *supra* note 49, at 1109.

52. Morris & Perry, *supra* note 50, at 127, 138; *see, e.g.*, Edward W. Morris, *supra* note 42; Blake et al., *The Role of Colorism*, *supra* note 1, at 90-106, 118-30; Jamilia J. Blake, Bettie Ray Butler & Danielle Smith, *Challenging Middle-Class Notions of Femininity: The Cause of Black Females' Disproportionate Suspension Rates*, *in* CLOSING THE SCHOOL DISCIPLINE GAP: EQUITABLE REMEDIES FOR EXCESSIVE EXCLUSION 75, 76 (Daniel J. Losen ed., 2015); EPSTEIN ET AL., *supra* note 1.

53. EPSTEIN ET AL., *supra* note 1.

54. *Id.*

55. JAMILIA J. BLAKE & REBECCA EPSTEIN, GEO. L. CTR. ON POVERTY & INEQ., LISTENING TO BLACK WOMEN AND GIRLS: LIVED EXPERIENCES WITH ADULTIFICATION BIAS (2021), [https://perma.cc/P7FB-YETB].

56. *See, e.g.*, Kimberlé Williams Crenshaw, *The First Decade: Critical Reflections or "a Foot Closing in the Door,"* 49 UCLA L. REV. 1343 (2002); Trust Kupupika, *Shaping our Freedom Dreams: Reshaping Intersectionality Through Black Feminist Legal Theory*, 107 VA. L. REV. 27 (2021); Gregory Scott Parks*, Toward Critical Race Realism*, 17 CORNELL J. L. & PUB. POL'Y 683, 708, 713, 714 (2008); KIMBERLÉ WILLIAMS CRENSHAW, NEIL GOTANDA, GARY PELLER & KENDALL THOMAS, CRITICAL RACE THEORY, THE KEY WRITINGS THAT FORMED THE MOVEMENT (1996).

portance of intersectional analyses of structural discrimination in public systems, empirical and theoretical research on RP has been largely silent about the unique harms of racial and gender bias in school and how RP might contribute to systemic reform. A recent national review of school-based RP research, for example, only identified and cited one study specific to girls' of color experiences with RP.[60] Instead, quantitative and qualitative analyses of RP most often use aggregated racial categories in evaluating its effects, including female students within the larger racial categories but not examining outcomes unique to race and gender.[61]

57. *See, e.g.*, Kenneth S. León, *Critical Criminology and Race: Re-examining the Whiteness of US Criminological Thought*, 60 HOWARD J. CRIME & JUST. 388 (2021); Michelle Brown & Eamonn Carrabine, *The Critical Foundations of Visual Criminology: The State, Crisis, and the Sensory*, 27 CRIT. CRIM. 191, 195, 201 (2019); Michael J. Coyle & Judah Schept, *Penal Abolition Praxis*, 26 CRIT. CRIM. 319, 319-23 (2018).

58. *See, e.g.*, Johanna Kantola & Emanuela Lombardo, *Feminist Political Analysis: Exploring Strengths, Hegemonies and Limitations*, 18 FEMINIST THEORY 323, 328-32 (2017); Kathy E. Ferguson, *Feminist Theory Today*, 20 ANN. REV. POL. SCI. 269, 275 (2017); Mary Hawkesworth, *From Constitutive Outside to the Politics of Extinction: Critical Race Theory, Feminist Theory, and Political Theory*, 63 POL. RSCH. Q. 686, 688, 693 (2010).

59. Chandra L. Ford & Collins O. Airhihenbuwa, Commentary, *Critical Race Theory, Race Equity, and Public Health: Toward Antiracism Praxis*, 100 AM. J. PUB. HEALTH (SUPP. 1) S30 (2010); Chandra L. Ford, *Public Health Critical Race Praxis: An Introduction, an Intervention, and Three Points for Consideration*, 2016 WIS. L. REV., 478-91 (2016); Keon L. Gilbert & Rashawn Ray, *Why Police Kill Black Males with Impunity: Applying Public Health Critical Race Praxis (PHCRP) to Address the Determinants of Policing Behaviors and "Justifiable" Homicides in the USA*, 93 J. URB. HEALTH 122, 130-40 (2015).

60. FRONIUS ET AL., *supra* note 14, at 21-32 (citing Featherston's 2014 dissertation of Black adolescent girls' participation in Real Talk 4 Girls that used restorative circles). Our research review of school-based restorative justice literature, coding for race and gender (female), revealed less than 10 published and unpublished studies. The most cited studies were Schumacher's two-year ethnographic examination of weekly talking circles with an ethnically diverse cohort of adolescent high school girls and Featherston's experimental analysis of restorative justice on social aggression and problem-solving. *See* Schumacher, *supra* note 10, at 1, 4; Tonya R. Featherston, An Experimental Study on the Effectiveness of a Restorative Justice Intervention on the Social Aggression, Social Problem Solving Skills, and Prosocial Behaviors of African American Adolescent Girls (Apr. 2014) (Ph.D. dissertation, Capella University) (ProQuest). *See also* Vanessa Marie McPhail, Perceptions of Restorative Practices Among Black Girls: Talking Circles in an Urban Alternative Middle School (Dec. 2019) (Ph.D. dissertation, University of Louisville) (on file with University of Louisville). There is currently no published research specific to Latina, Asian Pacific Islander, American Indian or Native Alaskan girls' experiences with RP.

61. While some studies of RP outcomes analyze results by racial and ethnic categories, they do not disaggregate race and gender. As a result, data about girls of color is not separated, but instead absorbed into the wider category of *either* their race *or* their gender.

Even then, as critical feminist legal scholar Angela P. Harris has highlighted, "[r]estorative justice theorists and practitioners have been slow to make the leap . . . from their vision of 'making things right' to undoing gender violence"[62] and "[r]estorative justice advocates have had surprisingly little to say about racial subordination."[63] The dominance of this single-axis approach—one that focuses exclusively on race, without accounting for the compounding intersectional factor of gender—reinforces intersectional invisibility, effectively erasing Black and Latina girls from RP practice, research, and advocacy. As transformative and restorative justice scholar Johonna Turner has argued, critical race feminist approaches are imperative in becoming "more analytical, more visionary, more creative, and more radical in our approaches to safety and justice."[64]

The use of race as the single, or even principal, demographic variable in RP studies, as opposed to multi-axis analyses with specific attention to gendered racial oppression, is not surprising. The failure of research to center gender has a long history and is well documented,[65] including in the field of education. With a handful of exceptions,[66] research and resources focused on boys' experiences have consistently out-

62. Angela P. Harris, *Beyond the Monster Factory: Gender Violence, Race, and the Liberatory Potential of Restorative Justice*, 25 BERKELEY J. GENDER L. & JUST. 199, 210 (reviewing SUNNY SCHWARTZ & DAVID BOODELL, DREAMS FROM THE MONSTER FACTORY: A TALE OF PRISON, REDEMPTION, AND ONE WOMAN'S FIGHT TO RESTORE JUSTICE TO ALL (2010)) (arguing that in order to address the realities of racial subordination and gender violence, restorative justice should integrate critical feminist approaches).

63. *Id.* at 216-17.

64. Johonna Turner, *Race, Gender and Restorative Justice: Ten Gifts of a Critical Race Feminist Approach*, 23 RICH. PUB. INT. L. REV. 267, 294-95 (2019).

65. *See, e.g.*, Stephanie S. Covington & Barbara E. Bloom, *Gendered Justice: Women in the Criminal Justice System*, *in* GENDERED JUSTICE: ADDRESSING FEMALE OFFENDERS 1, 2 (Barbara E. Bloom ed., 2003) (research has been "tainted by . . . male approaches to social reality"); Aleksandra Cislak, Magdalena Formanowicz & Tamar Saguy, *Bias Against Research on Gender Bias*, 115 SCIENTOMETRICS 189, 190 (2018) ("[S]cientific inquiries often disregard the moderating roles of sex or gender . . . ."). *See also* Meg Upchurch, *Gender Bias in Research*, *in* COMPANION TO WOMEN'S AND GENDER STUDIES 139 (Nancy A. Naples ed., 2020).

66. SUSAN MCGEE BAILEY, WELLESLEY COLL. CTR. FOR WOMEN, HOW SCHOOLS SHORTCHANGE GIRLS: THE AAUW REPORT: A STUDY OF MAJOR FINDINGS ON GIRLS AND EDUCATION (1992); *See, e.g.*, Shawn Arango Ricks, *Falling Through the Cracks: Black Girls and Education*, 4 INTERDISC. J. TEACHING & LEARNING 10, 11 (2014); Rosaly Correa-de-Araujo, *Serious Gaps: How the Lack of Sex/Gender-Based Research Impairs Health*, 15 J. WOMEN'S HEALTH 1116 (2006); MYRA SADKER & DAVID SADKER, FAILING AT FAIRNESS: HOW OUR SCHOOLS CHEAT GIRLS (1994); PEGGY ORENSTEIN, SCHOOLGIRLS: YOUNG WOMEN, SELF-ESTEEM, AND THE CONFIDENCE GAP (1995).

weighed those directed toward girls in schools.[67] Education research often does not recognize gender and race/ethnicity as "simultaneously lived and intersecting" characteristics with unique factors and outcomes.[68] Furthermore, as discussed *infra*, RP has been cast as a remedy to systemic and structural racism without interrogating the extent to which "women [and girls] of color are disproportionately stalled at the bottom of every society."[69]

III. RESTORATIVE PRACTICES AND PUBLIC HEALTH FRAMEWORKS

Despite the limits and harms of the dominant reactive framework, the evidence base demonstrating the benefits of school-based RP has matured and grown. Researchers have examined student- and community-level effects of RP in multiple categories, including school connectedness,[70] peer respect and relationships,[71] school climate,[72] conflict resolution capacities,[73] resilience,[74] and social-emotional skills.[75] Although

67. Marcus Weaver-Hightower, *The "Boy Turn" in Research on Gender and Education*, 73 REV. EDUC. RSCH. 471 (2003); Patrice Juliet Pinder & Edith L. Blackwell, *The "Black Girl Turn" in Research on Gender, Race, and Science Education: Toward Exploring and Understanding the Early Experiences of Black Females in Science, a Literature Review*, 18 J. AFR. AM. STUD. 63, 64 (2014).

68. Catherine Riegle-Crumb & Melissa Humphries, *Exploring Bias in Math Teachers' Perceptions of Students' Ability by Gender and Race/Ethnicity*, 26 GENDER & SOC'Y 290, 294 (2012); *See also* KIMBERLYN LEARY, GEO. L. CTR. ON POVERTY & INEQ., MENTAL HEALTH AND GIRLS OF COLOR 3 (2019); Lisa C. Ikemoto, *In the Shadow of Race: Women of Color in Health Disparities Policy*, 39 U.C. DAVIS L. REV. 1023, 1035 (2006); Annamma et al., *supra* note 1, at 211; SMITH-EVANS & GEORGE, *supra* note 42, at 1.

69. Adrien K. Wing, *Critical Race Feminism*, *in* THEORIES OF RACE AND ETHNICITY 162 (Karim Murji & John Solomos eds., 2014).

70. MARILYN ARMOUR & JELENA TODIC, INST. RESTORATIVE JUST. & RESTORATIVE DIALOGUE, RESTORATIVE PRACTICES AT A CHARTER K-3 ELEMENTARY SCHOOL FIRST YEAR IMPLEMENTATION EVALUATION 1 (2015); TOLEFREE, *supra* note 21.

71. GONZÁLEZ & EPSTEIN, *supra* note 35, at 1; SARA TERRILL, MIDAM. NAZARENE U. COLLOQUIUM, DISCIPLINE THAT RESTORES: AN EXAMINATION OF RESTORATIVE JUSTICE IN THE SCHOOL SETTING (2018).

72. AUGUSTINE ET AL., *supra* note 23, at 47-60; Anne Gregory, Kathleen Clawson, Alycia Davis & Jennifer Gerewitz, *The Promise of Restorative Practices to Transform Teacher-Student Relationships and Achieve Equity in School Discipline*, 26 J. EDUC. & PSYCH. CONSUL., 325, 343-45 (2014).

73. Lilyana Ortega, Mikhail Lyubansky, Saundra Nettles & Dorothy L. Espelage, *Outcomes of a Restorative Circles Program in a High School Setting*, 6 PSYCH. VIOLENCE, 459, 464-66 (2016).

74. Knight & Wadhwa, *supra* note 21, at 11, 14-16.

these outcomes are clearly linked to the fields of public health and health law,[76] RP research has not been squarely situated within the contexts of social determinants of health or public health.[77] This is a missed opportunity to form bridges that transcend disciplines and deconstruct gendered and racialized institutions,[78] policies, and laws that harm youth health. It is also surprising as each of these outcomes serve as protective health factors for youth that are associated with decreased risks for negative health behaviors and positive lifelong health effects.[79] We are not without hope that this work will develop. There is early evidence, distinct from our study, of an interdisciplinary interest in a broader approach to research on school-based RP that acknowledges its association with public health. While nascent, the scholarship makes conceptual and empirical connections, framing RP as a health equity in-

75. MARTHA A. BROWN, CREATING RESTORATIVE SCHOOLS: SETTING SCHOOLS UP TO SUCCEED 1 (2020); JAIN ET AL., *supra* note 10, at 53, 57; Schumacher *supra* note 10, at 3-4.

76. Thalia González, Alexis Etow & Cesar De La Vega, *A Health Justice Response to School Discipline and Policing*, 71 AM. U. L. REV. (2022).

77. Consider for example the concept of connectedness and its importance to health and well-being. *See, e.g.*, Cynthia Ewell Foster, Adam Horwitz, Alvin Thomas, Kiel Opperman, Polly Gipson, Amanda Burnside, Deborah M. Stone & Cheryl A. King, *Connectedness to Family, School, Peers, and Community in Socially Vulnerable Adolescents*, 81 CHILD & YOUTH SERV. REV. 321, 323-29 (2017). Connectedness has the potential to be a target of interventions designed to increase protective factors for youth. *See* CENTERS FOR DISEASE CONTROL, ADOLESCENT AND SCHOOL HEALTH: ADOLESCENT CONNECTEDNESS (Aug. 2019), [https://perma.cc/N8UE-WPSP] [hereinafter ADOLESCENT CONNECTEDNESS]. Studies of peer connectedness indicate that youth who have positive relationships with peers are less likely to engage in violence and delinquency. *See, e.g.*, Dustin A. Pardini, Rolf Loeber, David P. Farrington & Magda Stouthamer-Loeber, *Identifying Direct Protective Factors for Nonviolence*, 43 AM. J. PREVENTATIVE MED. S29, S30-S32, S39 (2012). Social positive peer relations in adolescence predict better health and lower healthcare costs in early adulthood. Marlon P. Mundt & Larissa I. Zakletskaia, *That's What Friends Are For: Adolescent Peer Social Status, Health-Related Quality of Life and Healthcare Costs*, APPLIED HEALTH ECON. & HEALTH POL'Y 191, 200 (2014).

78. *See* Joan Acker, *From Sex Roles to Gendered Institutions*, 21 CONTEMPORARY SOCIOLOGY 5, 565-569, 567 (1992) ("The term 'gendered institutions' means that gender is present in the processes, practices, images and ideologies, and distributions of power in the various sectors of social life. Taken as more or less functioning wholes, the institutional structures of the United States and other societies are organized along lines of gender. The law, politics, religion, the academy, the state, and the economy, areas covered in the reviews below, are institutions historically developed by men, currently dominated by men, and symbolically interpreted from the standpoint of men in leading positions, both in the present and historically. These institutions have been defined by the absence of women.").

79. Robert A. Hahn & Benedict I. Truman, *Education Improves Public Health and Promotes Health Equity*, 45 INT'L J. HEALTH SERV. 657, 660, 671-73 (2015).

tervention in the context of schools.[80] Using the California Healthy Schools Survey, for example, researchers conducted secondary data analysis to examine the effects of school-based restorative justice on physical health, mental health, and academic achievement.[81] Their findings indicate that students who attend schools that use RP have lower rates of school absences due to adverse health and better academic outcomes.[82]

IV. STUDY DESIGN AND METHODS

As an interdisciplinary project, our study aims to bridge gaps in the fields of law, education, restorative justice, and public health.[83] The research design is grounded in critical race feminism[84] and employs youth participatory action research methods.[85] The importance of intersection-

80. EPSTEIN ET AL., *supra* note 1, at 9-11; Thalia González, Alexis Etow & Cesar De La Vega, *Health Equity, School Discipline Reform, and Restorative Justice,* 47 J. L. MED. & ETHICS 47-50 (2019); Jelena Todic, Catherine Cubbin & Marilyn Armour, *Restorative Justice in K-12 Schools as a Structural Health Equity Intervention*, *in* ROUTLEDGE INT'L HANDBOOK OF DELIQ. & HEALTH (M.G. Vaugh, C.P. Salas-Wright & D.B. Jackson eds. 2019); Jelena Todic, Catherine Cubbin, Marilyn Armour, Michele Rountree & Thalia González, *Reframing School-Based Restorative Justice as a Structural Population Health Intervention*, 62 HEALTH & PLACE 1, 2-3, 8 (2020) [hereinafter *Reframing School-Based Restorative Justice*].

81. *Reframing School-Based Restorative Justice*, *supra* note 80.

82. *Id.*

83. An earlier version of this study was presented by the Georgetown Center on Poverty & Inequality.

84. Legal scholars Kimberlé Crenshaw, Angela P. Harris, Dorothy Roberts, and Adrien Wing are widely accepted as leading theorists of critical race feminism. In each of their works they derive ideas from critical race theory, critical legal studies, and feminist theory but draw attention to the deficits of each approach. *See, e.g.*, DOROTHY ROBERTS, KILLING THE BLACK BODY: RACE, REPRODUCTION, AND THE MEANING OF LIBERTY (1997); Kimberlé Crenshaw, *Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics*, 1989 U. CHI. LEG. F. 139 (1989); Angela P. Harris, *Race and Essentialism in Feminist Legal Theory*, 42 STAN. L. REV. 581 (1990). We also drew project design elements from what has been named as the public health critical race praxis methodology. *See, e.g.*, Ford & Airhihenbuwa, *supra* note 59, at S30-35.

85. *See, e.g.*, Yolanda Anyon, Kimberly Bender, Heather Kennedy & Jonah Dechants, *A Systematic Review of Youth Participatory Action (YPAR) in the United States: Methodologies, Youth Outcomes, and Future Directions*, 45 HEALTH EDUC. & BEHAV. 865 (2018); Fran Braum, Colin MacDougall & Danielle Smith, *Participatory Action Research*, 60 J. EPIDEMIOL. CMTY. HEALTH 854-57 (2006); Steven Jacobs, *The Use of Participatory Action Research Within Education-Benefits to Stakeholders*, 6 WORLD J. ED. 48 (2016); Dana Mitra, *Student Voice in Secondary Schools*: *The Possibility for Deeper Change*, 56 J. EDUC. ADMIN. 473 (2018). In this study, for example, qualitative instruments, including focus group and survey questions, were co-designed with

ality, and, more specifically, critical race feminism as a theoretical approach and analytic framework[86] to conduct RP research, cannot be overstated. As scholars, we are committed to minimizing the harms of structural and systemic racism by advancing methodologies in health research that center the lived experiences of girls of color.[87]

Two research questions guided this project: (1) How do girls of color perceive non-disciplinary RP? (2) Do outcomes of non-disciplinary RP function as protective health factors for girls of color, e.g. lowering their likelihood of negative health outcomes or reducing impacts of risk factors?[88] To gather in-depth perceptions of RP, we conducted nine semi-structured focus groups across the country, representing a diverse array of demographics. Sixty-seven students between the ages of thirteen and eighteen years old participated in the study. All participants identified their gender as female and their racial backgrounds as Black or Latina. All affirmed that they participated in RP circles in school, whether female-only or mixed-gender, that were not a part of school disciplinary processes.[89]

Black and Latina high school students who lead restorative practices in their high school and throughout the Midwest region.

86. Critical race feminism "evinces that race and gender interact in a multiplicative fashion to influence both the identity of and discrimination against women of color. Because the connection between race and gender has traditionally been ignored or subordinated under the law and in American society, critical race feminism is an invaluable elaboration of the meaning of the intersection of race and gender." Leila Hilal, *What is Critical Race Feminism?*, 4 BUFF. HUM. RTS. L. REV. 367, 367 (1998); *See also* ADRIEN K. WING, CRITICAL RACE FEMINISM: A READER 1-19 (2003); ENAKSHI DUA & ANGELA ROBERTSON, SCRATCHING THE SURFACE OF RACISM: CANADIAN ANTI-RACIST FEMINIST THOUGHT 7-35 (1999).

87. This is consistent with critical research approaches in other fields. *See, e.g.*, Rita Kohli, Marcos Pizarro & Arturo Nevárez, *The "New Racism" of K-12 Schools: Centering Critical Research on Racism*, 41 REV. RSCH. EDUC. 188, 188-90, 196 (2017).

88. To examine these questions, we first hypothesized that girls of color would report positive changes in their educational experience after participating in non-disciplinary RP participation. Second, we expected that reported outcomes would be associated with known health protective factors.

89. To recruit participants for the study, emails were sent to school principals, teachers, and RP practitioners nationally. Responses were collected and short interviews were conducted with potential school host sites. School sites were selected based on four criteria: (1) duration of RP implementation; (2) use of RP separate from school discipline processes; (3) school demographics; and (4) geographic location. Selected school sites were located in the Northeast, Midwest, and Western regions of the country and located in rural and urban districts. Focus groups were conducted in person at individual schools or at a site in close proximity to the school. Strategies to recruit individual student participants at each school site varied depending on co-development with a local school contact. The collaboration with a local school contact was key because RP is built on relationships and trust, and researchers are often viewed as out-

Data was analyzed during collection to allow for the iterative nature of qualitative research. Analysis employed the constant comparative method, derived from grounded theory.[90] Grounded theory is a structured yet flexible methodology aimed at uncovering processes about which little is known.[91] Independent field notes were taken throughout the collection process to compare and explore ideas and themes raised.[92] This also provided theoretical directions for the research. Each focus group was recorded with participant and parental permission and consent and then transcribed. Transcripts were coded line by line, and key ideas and themes were developed by open and axial coding.[93] A codebook[94] was developed from a sample of early transcripts and used to code later transcripts in an ongoing process as data was collected.[95] As more transcripts were coded, the codebook was refined to reflect newly emerging ideas or themes. Utilizing an interpretive and inductive approach provided an immediate feedback system for identifying new and co-occurring codes. Ongoing analysis included returning to the original transcripts to ensure text was coded within context.[96] Once coding was completed on a single transcript, a domain analysis was created to identify

siders in school communities. There are several limitations to this study. First, the sample study size is not representative of all Black and/or Latina girls who participate in RP at each school site. In addition, participants were excluded from this study if their participation in RP related exclusively to the school's discipline policy. Second, no participants were assigned to the study. All participants elected to join the focus groups. Thus, selection bias may have occurred. Finally, findings from this study are only generalizable to other schools that have similar practices and serve a comparable population of students. Further investigation of the patterns using a larger sample of schools and students will substantially further knowledge development.

90. BARNEY G. GLASER & ANSELM L. STRAUSS, THE DISCOVERY OF GROUNDED THEORY: STRATEGIES FOR QUALITATIVE RESEARCH 161-75, 185 (1967).
91. Anthony Bryant & Kathy Charmaz, *Grounded Theory Research: Methods and Practices*, *in* THE SAGE HANDBOOK OF GROUNDED THEORY 1-28 (Anthony Bryant & Kathy Charmaz eds., 2007).
92. KATHY CHARMAZ, CONSTRUCTING GROUNDED THEORY: A PRACTICAL GUIDE THROUGH QUALITATIVE ANALYSIS 96-100 (2006).
93. JULIET CORBIN & ANSLEM STRAUSS, BASICS OF QUALITATIVE RESEARCH: GROUNDED THEORY PROCEDURES AND TECHNIQUES 65-70 (1990).
94. Code were words or phrases applied to an excerpt of data to capture a specific pattern, theme, meaning or relationship. Codes for the study were both predetermined from the literature review (e.g., a priori) and defined by participants in the focus groups (e.g., in vivo).
95. Codes in this study included single words (e.g., "safe") and phrases ("safe space" or "safe place").
96. Coding was carried out using Dedoose qualitative data analysis software.

categories and subcategories.[97] In subsequent analyses, codes were consolidated or expanded based on clusters of coded data from multiple focus groups to yield more refined categories and subcategories. Based on the patterns that emerged from the data, we identified four domains of outcomes with corresponding sub-outcomes and domain metrics: connectedness, school climate, social-emotional literacy skills, and improved conditions for mental health, resilience, and empowerment. (Table 1).

TABLE 1. OUTCOMES

Outcome	*Sub-outcome*	Domain metric
Connectedness	School connectedness Peer connectedness Familial connectedness	Social belonging, shared experiences, trust, relationship growth and development, mutuality, vulnerability, respect, care, concern, collaboration
School climate		Supportive relationships, positive learning environments, safety, trust, authentic expression, non-judgment, and decreased sense of isolation
Social emotional literacy		Self-awareness, self-management, social awareness, relationship skills, responsible decision-making, empathy, listening skills, confidence
Mental health and resilience		Navigation and perseverance through adversity, self-esteem, empowerment, social cohesion, decreased physical and mental health symptomologies, decreased sense of isolation

This Article *intentionally* includes the voices of Black and Latina girls, rather than referring only to coded metrics or aggregate response rates, in an attempt to dismantle hierarchical and disciplinary distinctions of power, especially in the field of law. In developing upstream in-

97. Mojtaba Vaismoradi, Jacqueline Jones, Hannele Turunen & Sherrill Snelgrove, *Theme Development in Qualitative Content Analysis and Thematic Analysis*, 6 J. NURSING EDUC. & PRAC. 100, 101–03 (2016).

terventions that advance equity, the expertise of Black and Latina girls is essential. We therefore choose to center those who have been most disenfranchised by gendered and racialized institutional power systems and inequities as experts in their own lives, strengths, and needs. In addition to confronting the neglect of Black and Latina girls in the field of school-based RP, this research seeks to shift the traditional framing for communicating about and studying RP as well as system-level reform. Simply put, RP is more than a remedy to the punishment, exclusion, and policing of students of color. It is a practice that exists squarely within the growing health justice framework[98] and is applicable at micro-levels, including schools, and macro-levels, such as law and policy aimed at disrupting structural discrimination in social determinant systems—in this case, education.[99]

IV. DISCUSSION

A. *Connectedness*

In employing the term "connectedness" for youth, we use the widely accepted definition of "a sense of being cared for, supported, and belonging," which "can be centered on feeling connected to school, family (i.e. parents and caregivers), or other important people and organizations in their lives."[100] As Table 1 indicates, analysis of girls' descriptions of their experiences with school-based RP revealed associations in three sub-categories of connectedness: school, peer, and familial. Though each construct is distinct, many overlap, including feelings of commonality or shared experience, social belonging, vulnerability, respect, trust, care, and concern.

98. *See, e.g.*, Emily A. Benfer, *Health Justice: A Framework (and Call to Action) for the Elimination of Health Inequity and Social Injustice*, 65 AM. U. L. REV. 275, 306-20 (2015); Emily A. Benfer, Seema Mohapatra, Lindsay F. Wiley & Ruqaiijah Yearby, *Health Justice Strategies to Combat the Pandemic: Eliminating Discrimination, Poverty, and Health Disparities During and After COVID-19*, 19 YALE J. HEALTH POL'Y LAW & ETHICS 122, 130-36 (2020); Lindsay F. Wiley, *Health Law as Social Justice*, 24 CORNELL J. L. & PUB. POL'Y 47, 47 (2014). Health justice scholars embrace an expanded conceptualization of discrimination as "not limited to what courts recognize as a basis for legal remedies; it also includes actions described as discrimination, bias, and unfair treatment in public health and sociology literature, even though they may not be deemed legally actionable by US courts."

99. González et al., *supra* note 12.

100. ADOLESCENT CONNECTEDNESS, *supra* note 77.

1. School Connectedness

School connectedness is a key health-protective factor that can provide three health benefits: (1) it can reduce health-risk behaviors that are particularly high risks for girls, such as eating disorders and suicidal thoughts;[101] (2) it can promote self-efficacy, academic achievement, and resilience;[102] and (3) it can buffer against negative peer influence.[103] Positive teacher relationships are central to a strong sense of school connectedness.[104] Research reveals that girls, in particular, "place great value on teachers' support, both academic and personal,"[105] and they are more likely to seek support from teachers with whom they have strong relationships.[106]

Girls in all focus groups described RP as helping build stronger relationships with teachers. Most often, relationships were strengthened when, during RP, they discovered shared experiences or other commonalities with their teachers. Breaking down the sense of separation or dis-

101. Karen F. Osterman, *Students' Need for Belonging in the School Community*, 70 REV. EDUC. RES. 323, 327, 342-48 (2000); CTRS. FOR DISEASE CONTROL & PREVENTION & U.S. DEP'T OF HEALTH & HUMAN SERVS., FOSTERING SCHOOL CONNECTEDNESS: IMPROVING STUDENT HEALTH AND ACADEMIC ACHIEVEMENT 1 (2009), [https://perma.cc/QXH8-4ZDZ] [hereinafter FOSTERING SCHOOL CONNECTEDNESS]; Clea McNeely & Christina Falci, *School Connectedness and the Transition into and Out of Health-Risk Behavior Among Adolescents: A Comparison of Social Belonging and Teacher Support*, 74 J. SCH. HEALTH 284, 291 (2004). *See also* Linda M. Raffaele Mendez, Stephanie T. Mihalas & Robin Hardesty, *Gender Differences in Academic Development and Performance*, *in* CHILDREN'S NEEDS III: DEVELOPMENT, PREVENTION, AND INTERVENTION (George G. Bear & Kathleen M. Minke eds., 2006).

102. Adena M. Klem & James P. Connell, *Relationships Matter: Linking Teacher Support to Student Engagement and Achievement*, 74 J. SCH. HEALTH 262 (2004); Hilary D. Joyce & Theresa J. Early, *The Impact of School Connectedness and Teacher Support on Depressive Symptoms in Adolescents: A Multilevel Analysis*, 39 CHILD. & YOUTH SERVS. REV. 101 (2014); Shannon H. Andrus, Peter J. Kuriloff & Charlotte E. Jacobs, *Teaching Middle School Girls More Effectively: Initial Results from a National Study*, 74 INDEP. SCH. 16, 18 (2015) (noting "centrality of [girls'] connections with teachers and peers").

103. Alexandra Loukas & Keryn E. Pasch, *Does School Connectedness Buffer the Impact of Peer Victimization on Early Adolescents' Subsequent Adjustment Problems?* 33 J. EARLY ADOLESCENCE 245 (2013).

104. ADOLESCENT CONNECTEDNESS, *supra* note 77.

105. Andrus et al., *supra* note 102, at 18; *see* Jessica T. DeCuir-Gunby, *A Review of the Racial Identity Development of African American Adolescents: The Role of Education,* 79 REV. EDUC. RSCH. 103, 114 (2009) ("[T]eacher-student relations are viewed as a paramount dimension of the school environment.").

106. Clea McNeely & Christina Falci, *School Connectedness and the Transition into and out of Health-Risk Behavior Among Adolescents: A Comparison of Social Belonging and Teacher Support*, 74 J. SCH. HEALTH 284, 291 (2004).

connection shifted girls' perception of their teachers as unrelatable authority figures. In particular, they singled out how discussions during RP helped them recognize their teachers' emotional vulnerabilities, which both strengthened their connection to them and decreased their own sense of isolation: "Seeing [my teacher] cry, like, it, it, like, it touched my heart 'cause it's, like, 'She's scared, too. We're all scared.' So, everybody in that room . . . the look on their faces . . . they were all scared. So, I felt like I wasn't the only one there."

The social cohesion and feeling of safety established by RP translated into participants' increased partnership and cooperation with teachers. One participant described RP as opening new channels for dialogue, with teachers "checking up on you ... how you're doing . . . on schoolwork, your grades, and . . . how you're feeling." Another said that a conversation during a restorative intervention helped her teacher understand why a student was struggling and how to support him. "There is a reason behind why that kid is failing this class. Um, it's not just because he's lazy or he doesn't have time for it. And in that circle he can, like, reveal, like . . . what he's going through, and it changes, like, the teacher's perspective. He [the teacher] might give him more time, um, to turn in a work, an assignment." Relatedly, a girl described how she witnessed teachers incorporating the lessons that they learned from RP into other contexts: "[Teachers] actually take into consideration of what you said and actually, you know, apply it . . . to the class." Girls' ties to teachers also increased their sense of psychological safety in school–especially in schools with multi-year programs. "[S]he [the teacher who leads RP] makes you feel comfortable and safe. It's a place where . . . you're not judged. And you're not, you know, bashed about anything you say or do in the circle."

Multiple girls emphasized that core aspects of RP, including voluntariness, respect, and its non-hierarchical structure, were central to the development of feelings of trust and engagement with their teachers. As one participant explained, "[T]hey're not forcing me. They actually ask me. And, if you want to do restorative justice, you do it. But if you don't want to, you don't have to." Others stated that circles in their schools increased feelings of autonomy, self-efficacy, and mutual respect. As one girl explained, "[W]e feel, like, as if we actually have a voice and actually have, like, equal respect and power with the teachers. And that's really important." In a different focus group, a participant emphasized that "[teachers] actually take into consideration of what you said and actually, you know, apply it . . . to the class."

2. Peer Connectedness

It is well established that peer connections are critical to girls' health.[107] In fact, "[f]emale friendship is one of the most important dimensions of a girl's life, and its influence on her well-being may be surpassed only by family relationships in her growth toward adulthood."[108] Relationships among peers can improve girls' health and academic success by protecting against the initiation of high-risk behaviors.[109] Connections to peers also serve as a protective factor, or buffer, against victimization and violence for girls.[110] In addition, similar to the outcomes associated with school connectedness, support from peers can decrease health-risk behaviors for girls,[111] create a sense of belonging and attachment, increase self-esteem, and heighten motivation to achieve success at school.[112]

Across all focus groups, girls associated RP with the development of positive peer relationships, which they described by using affective statements, including a sense of support, social belonging, and being cared for. One girl characterized the experience of RP: "You walk in a room full of strangers. And you leave out that room with, like, your best friend." Girls also described RP as creating a physical and psychological environment that made them feel understood, rather than isolated—

107. Peer connections, often represented in the literature as prosocial peer relationships, are represented by a host of positive behaviors such as cooperation, sharing, and support. *See, e.g.*, Eva H. Telzer, Jorien van Hoorn, Christina R. Rogers & Kathy T. Do, *Social Influence on Positive Youth Development: A Developmental Neuroscience Perspective*, *in* 54 ADVANCES IN CHILD DEVELOPMENT AND BEHAVIOR 215, 222-23 (Janette B. Benson, ed., 2018). *See also* Beth Hossfeld, *Developing Friendships and Peer Relationships: Building Social Support with the Girls Circle Program*, *in* HANDBOOK OF PREVENTION AND INTERVENTION PROGRAMS FOR ADOLESCENT GIRLS 42, 43-44 (Craig Winston LeCroy & Joyce Elizabeth Mann eds., 2008).

108. Hossfeld, *supra* note 107, at 43.

109. ADOLESCENT CONNECTEDNESS, *supra* note 77.

110. Rebecca J. Shlafer, Barbara J. McMorris, Renee E. Sieving & Amy L. Gower, *The Impact of Family and Peer Protective Factors on Girls' Violence Perpetration and Victimization*, 52 J. ADOLESCENT HEALTH 365, 369-70 (2013).

111. Prosocial peers can prevent victimization and bullying—social peers can cause disconnection from school and negatively affect health behaviors. FOSTERING SCHOOL CONNECTEDNESS, *supra* note 101, at 1; *see* Yibing Li, Alicia Doyle Lynch, Carla Kalvin, Jianjun Liu & Richard M. Lerner, *Peer relationships as a context for the development of school engagement during early adolescence*, 35 INT'L J. BEHAV. DEV. 329, 340 (2011) ("[P]resence of supportive peer relationships significantly and positively predicted both emotional and behavioral school engagement across time.").

112. DEBRA PEPLER & KAREN BIERMAN, WITH A LITTLE HELP FROM MY FRIENDS: THE IMPORTANCE OF PEER RELATIONSHIPS FOR SOCIAL-EMOTIONAL DEVELOPMENT 5 (2018).

many described it as a "safe space." Another noted, "[Other students] express themselves and they tell the group what they've gone through. And it's like, 'Dang, you go through it, too?' And so, like, I could relate to that, too." A different girl identified that "[r]estorative justice has taught me that, um, someone else might be going through that uh, situation that I went—have went through." Additionally, multiple girls credited RP with creating a climate for interactions with peers that were more tolerant and supportive of individual differences. This benefit was most often described as a context in which "we [are] all contributing. Everyone's open and honest."

Girls were clear that new relationships developed between students because RP allowed them to connect about personal and academic experiences. Shared experiences led to feelings of social belonging: "[Restorative justice] is just being able to have someone to hear me out and having someone to, like, tell me the same thing I felt. And, just, like being—[we] creat[ed] a bond." Significantly, this sense of social belonging was not limited to times that students were actively engaged in RP.

Across all focus groups, girls characterized RP as creating an environment of collaborative problem-solving: "[B]y . . . speaking up and sharing what I felt, or what I went through ... someone else [could] relate to that, and that's how we can get to their root of the problem and how we can fix . . . the community, and . . . how to find . . . the problem within themselves." RP was also associated with cooperation, better understanding of social cues, and management of emotions and impulse control. As one girl explained, "[Y]ou talk about, like, stuff that happened and how it made you feel and, like, what you'd like to change, like, in the future and how you want to make things better to where things aren't awkward between you and the other person."

3. Familial Connectedness

Family connectedness is one of the most important protective health factors for youth. It can protect against a variety of health-risk factors, including substance use,[113] early onset of sexual behavior,[114] in-

113. Michael D. Resnick, Peter S. Bearman, Robert Wm. Blum, Karl E. Bauman, Kathleen M. Harris, Jo Jones, Joyce Tabor, Trish Beuhring, Renee E. Sieving, Marcia Shew, Marjorie Ireland, Linda H. Bearinger & J. Richard Udry, *Protecting Adolescents from Harm: Findings from the National Longitudinal Study on Adolescent Health*, 278 J. AM. MED. ASS'N 823, 823, 829-30 (1997) [hereinafter Resnick et al., *Protecting Adolescents*].

114. *Id.* at 823, 830.

ternalizing disorders,[115] and suicide attempts.[116] It can also help girls of color cope with the experience of chronic violence and other forms of adversity.[117] Research examining familial support for Black girls demonstrated that it is associated with lower levels of depression and anxiety.[118] Studies also show that girls with stronger connections to family, especially parents, achieve greater academic success.[119]

Girls in several focus groups reported that they used the skills they learned from their participation in RP at school to improve their relationships at home through better communication, improved conflict-resolution strategies, and increased empathy. One explained that her experience with RP more fully prepared her to address and improve a particularly difficult family relationship:

> I learned [from] restorative justice that there's probably a reason [that] led to me and my father not having a good relationship . . . [S]o I took a step back and then I started thinking about stuff . . . and I was like, 'Oh, um, it's better if we talk things out.' I'm not saying, like, right now our relationship is perfect, . . . but like, now lately with restorative justice, I feel like when I speak to him, it's not like I go out right away or we argue. It's that, 'Okay, I'm understanding your perspective. Now understand my perspective.'"

Girls also associated RP with increased openness at home. One girl observed that RP in school translated into skills she used in her home life: "[I could] be more vulnerable to not only peers and teachers, but to my own family."

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115. Randal D. Day & Laura M. Padilla-Walker, *Mother and Father Connectedness and Involvement During Early Adolescence*, 23 J. FAM. PSYCH. 900 (2009).

116. *See* Michael D. Resnick, Marjorie Ireland & Iris Borowsky, *Youth Violence Perpetration: What Protects? What Predicts? Findings from the National Longitudinal Study of Adolescent Health*, 35 J. ADOLESCENT HEALTH 424.e1, 424.e7 (2004) [hereinafter Resnick et al., Y*outh Violence Perpetration*].

117. *See id.* at 424.e7-24.e8; Shlafer et al., *supra* note 110, at 365, 369; Angelique Trask-Tate, Michael Cunningham & Lucinda Lang-DeGrange, *The Importance of Family: The Impact of Social Support on Symptoms of Psychological Distress in African American Girls*, 7 RSCH. HUM. DEV. 164, 164, 166 (2013). *See also* Resnick et al., *Protecting Adolescents*, *supra* note 113, at 823.

118. Trask-Tate et al., *supra* note 117, at 166.

119. *See, e.g.*, Ruth N. López Turley, Matthew Desmond & Sarah K. Bruch, *Unanticipated Educational Consequences of a Positive Parent-Child Relationship*, 72 J. MARRIAGE & FAM. 1377, 1377 (2010).

B. *School Climate*

School climate is defined as "the quality and character of school life,"[120] including, but not limited to, values and norms, relationships, and "quality of instruction and academic expectations."[121] While a distinct construct from connectedness,[122] there is a co-influential relationship between school climate and connectedness. In particular, they involve overlapping indicators and predictors, such as relational school climate, student perceptions of teachers, and peer relationships.[123] Additionally, student perceptions of safety are used to assess both school climate and connectedness.[124]

Positive school climate is foundational for girls' health: "Of the constellation of forces that influence adolescent health-risk behavior, the most fundamental are the social contexts in which adolescents are embedded."[125] Safe schools with positive climates serve as critical sites of wellbeing for girls who lack safety elsewhere in their lives.[126] Psychological safety can be particularly important to girls, who are keenly aware of the potential of experiencing harassment and sexual violence.[127] When

120. *What is School Climate and Why is it Important?*, NAT'L SCH. CLIMATE CTR., [https://perma.cc/8LS8-9N5X] (last visited Oct. 29, 2022).

121. Kelli Franco, Elizabeth Baumler, Elizabeth D. Torres, Yu Lu, Leila Wood & Jeff R. Temple, *The Link Between School Climate and Mental Health Among an Ethnically Diverse Sample of Middle School Youth*, CURRENT PSYCH. (Mar. 30, 2022), [https://perma.cc/7LUM-XT6Z]; *see, e.g.*, Amrit Thapa, Jonathan Cohen, Shawn Guffey & Ann Higgins-D'Alessandro, *A Review of School Climate Research*, 83 REV. EDUC. RSCH. 357, 358 (2013).

122. *See supra* Section A(i). Variances in indicators and predictors are also dependent on study design, including theoretical frameworks, measurements, experiments, etc. This distinction is also evidenced in policy and practice interventions that aim to independently as well as collectively positively influence school connectedness and school climate.

123. *See supra* Section A(i); Franco, *supra* note 119, at 2.

124. *Franco*, *supra* note 121, at 3-4.

125. Resnick et al., *Protecting Adolescents*, *supra* note 113, at 823; Resnick et al., *Youth Violence Perpetration*, *supra* note 116.

126. Gabriel P. Kuperminc, Bonnie J. Leadbeater & Sidney J. Blatt, *School Social Climate and Individual Differences in Vulnerability to Psychopathology Among Middle School Students*, 39 J. SCH. PSYCH. 141, 141-59 (2002).

127. SUSAN J. POPKIN, TAMA LEVENTHAL & GRETCHEN WEISMANN, METRO. HOUS. & COMMUNITIES CTR., GIRLS IN THE 'HOOD: THE IMPORTANCE OF FEELING SAFE 2, 4 (2008) (finding that of all youth who moved away from dangerous neighborhoods and into safer communities, only girls were particularly aware of having escaped a dangerous environment, and were able to let go of "the "constant need to be alert, aware and protective"; attributing result to girls' "reduced anxiety about harassment,

girls feel emotionally unsafe, they also feel physically unsafe,[128] which can limit their academic achievement[129] and their healthy development. And for girls, a sense of safety is rooted in connections to people.[130] Studies show that girls value social support and are more oriented toward relationships than boys;[131] relationships with supportive adults, in particular, are vital to marginalized girls' sense of safety and well-being.[132] Research has shown that Black girls' relationships with adults who affirm their strength, intelligence, and power are associated with a greater chance of school success, a strong and healthy sense of identity, and less stress.[133] In our study, girls' experiences with RP revealed asso-

pressure for early sexual activity, and sexual violence."); *see also* Shannon B. Wanless, *The Role of Psychological Safety in Human Development*, 13 RSCH. HUM. DEV. 6 (2016).

128. JUDY SCHOENBERG, TOIJA RIGGINS & KIMBERLEE SALMOND, GIRL SCOUT RSCH. INST., FEELING SAFE: WHAT GIRLS SAY 7 (2003).

129. *Id.* at 15.

130. *Id.* at 15, 17.

131. Hossfeld, *supra* note 107, at 47.

132. GINA ADAMS, MARY BOGLE, JULIA B. ISAACS, HEATHER SANDSTROM, LISA DUBAY, JULIA GELATT & MICHAEL KATZ, URB. INST., STABILIZING CHILDREN'S LIVES: INSIGHTS FOR RESEARCH AND ACTION 7 (2016).

133. Connection to race and culture is also key. Several studies affirm the importance of positive cultural and ethnic identity for Black girls' health, in particular, because it can help counteract harmful societal messages associated with race and gender. *See, e.g.*, AVIS A. JONES-DEWEEVER, INST. WOMEN'S POL'Y RSCH., BLACK GIRLS IN NEW YORK CITY: UNTOLD STRENGTH AND RESILIENCE 19 (2009) ("[T]o the extent that they are successful in internalizing a positive conception of their racial identity and embracing egalitarian gender role attitudes as part of the process of self-understanding, the more likely Black girls are to hold favorable views of their physical appearance, fitness, academic achievement, career aspirations, and attach an importance to health."); Madonna G. Constantine, Vanessa L. Alleyne, Barbara C. Wallace & Deidre C. Franklin-Jackson, *Africentric Cultural Values: Their Relation to Positive Mental Health in African American Adolescent Girls*, 32 J. BLACK PSYCH. 141, 149-50 (2006) ("[G]reater adherence to Africentric values was predictive of higher self-esteem in our sample of African American adolescent girls. . . . [H]aving both strong Africentric values and favorable Black racial identity attitudes appears to be related to African American adolescent girls' internalized feelings of mastery, value, and self-acceptance (i.e., self-esteem)."); Shanette M. Harris, *Family, Self, and Sociocultural Contributions to Body-Image Attitudes of African-American Women*, 19 PSYCH. WOMEN Q. 129, 141 (1995) ("Women with encounter (i.e., pro-Black/anti-White attitudes), internalization (i.e., positive views of Blackness without anti-White attitudes) and immersion (i.e., the process of rejecting pro-White perspectives and incorporating experiences of black culture) attitudes hold favorable views of appearance, fitness, health, and body areas and attach importance to health."). *See also* Jeneka A. Joyce, Maya E. O'Neil, Elizabeth A. Stormshak, Ellen H. McWhirter & Thomas J. Dishion, *Peer Associations and Coping: The Mediating Role of Ethnic Identity for Urban, African American Adolescents*, 39 J. BLACK PSYCH. 431 (2013); Jamilia J. Blake, Bettie Ray Butler, Chance W. Lewis & Alicia Darensbourg, *Unmasking the Inequitable Discipline Experiences of Urban Black Girls: Implications for Urban Educational*

ciations with school climate in four indicators: safety, trust, supportive relationships, and positive learning environments.

Within the category of safety, girls in every focus group stated that RP increased their perceptions of safety in three interrelated ways: connection and relationships, authentic expression, and non-judgment. One girl summarized RP as "a safe place to . . . let go of every pain you bring inside." Similarly, another girl stated: "A lot of people have gone through . . . a lot of stuff, and circle helps us . . . try to make them feel better . . . [T]hey're safe here." Another noted that "[restorative practices create] a 'safe environment' . . . surrounded by . . . people that you trust the most. . . . [T]hey're offering support." One student described the confidentiality of restorative practices as a significant factor in creating trust: "[Y]ou can trust everybody in the room . . . nothing will be spilled. It will stay inside the room." In each focus group, RP was characterized as creating safety and trust by establishing a non-judgmental space: "[Wh]at I liked about restorative justice [was that] it . . . allowed me to, like, share my feelings without anybody judging because, you know, we all go through stuff." Another participant described RP: "[I]t's like a home, basically . . . [my teacher] makes you feel comfortable and safe." During RP, girls felt that they could express vulnerability without fear of being shamed or ostracized. In two-thirds of the focus groups, girls indicated that RP supported an egalitarian and collaborative classroom culture.

In schools that have implemented long-term RP, girls reported that their sense of safety increased over time. More specifically, they described RP as building community connections by establishing shared values and expectations. This translated into classroom and school environments in which participants felt emotionally, socially, and/or physically safe to participate. They also described feeling safer because RP increased their sense of being respected and belonging as a valued member of the community. One girl characterized RP as "[doing a] good job at, um, building a community since our freshman year. It really uh, opened up a safe space and a—you know, a—yeah, a safe space." In a different focus group, girls discussed that sharing feelings during RP with their peers fostered a heightened sense of trust, social cohesion, and safety—in RP, they could be vulnerable without fear of shaming or social isola-

Stakeholders, 43 URB. REV. 90 (2011); Tamara R. Buckley & Robert T. Carter, *Black Adolescent Girls: Do Gender Role and Racial Identity: Impact Their Self-Esteem?*, 53 SEX ROLES 647 (2005); Oseela Thomas, William Davidson & Harriette McAdoo, *An Evaluation Study of the Young Empowered Sisters (YES!) Program: Promoting Cultural Assets Among African American Adolescent Girls Through a Culturally Relevant School-Based Intervention*, 34 J. BLACK PSYCH. 281 (2008).

tion. Reflecting on a circle that addressed community violence, one participant noted: "I felt safe in that circle because everyone was, like, crying and talking it all out, what they felt." In five focus groups, girls described the safety established in RP as extending into their larger school community.

In each focus group, participants underscored that RP uniquely supported relationships, and, in turn, positive school climate, by building trust and feelings of safety: "That bond and having a connection with someone . . . . [T]rust is, like, . . . you're feeling safe . . . ." RP established trust that allowed students to authentically share feelings and experiences without fear of exposure to others. As one participant explained, "[Y]ou can trust everybody in the room . . . nothing will be spilled. It will stay inside the room." Multiple girls explained that RP developed trust between students and their teacher, and this, in turn, shifted the teacher's response to classroom behaviors from punitive to restorative. In particular, RP created "a group of people that you can really trust. And when it comes to discipline it's giving, um, the—the person a chance to explain themselves and give them a voice and let them be comfortable with us so that—so, like, that we can get to the root of the problem."

The relationships developed and sustained by RP were central to perceptions of positive learning environments. Girls expressed that their willingness to participate and cooperate with others was grounded in the relationships built by RP, and cooperation in the classroom was associated with perceptions of a more positive academic environment. One girl described RP as the teacher "checking up on you, like, how you're doing, like, on school—like, on schoolwork, your grades, and, like, how you're feeling." The outcome of such caring relationships was identified as distinct from more formal modes of teacher-student academic engagement.

C. *Social and Emotional Learning and Skills*

Social-emotional learning (SEL)[134] reduces the risk of harmful behaviors and contributes to self-confidence, self-efficacy, motivation, in-

134. *Fundamentals of SEL*, COLLABORATIVE FOR ACAD., SOC., & EMOTIONAL LEARNING, [https://perma.cc/ZMN5-JPRH] (last visited Oct. 29, 2022) (defining social-emotional learning as "the process through which all young people and adults acquire and apply the knowledge, skills, and attitudes to develop healthy identities, manage emotions and achieve personal and collective goals, feel and show empathy for others,

terpersonal skills, self-regulation, stress management, and positive interactions with adults—all of which support long-term health and wellbeing.[135] As a primary space for social interactions during key developmental years, schools can play a critical role in building SEL skills.[136] While a lack of social-emotional skills can lead to school disconnectedness and associated negative health effects,[137] strengthening these skills can boost protective factors, decreasing adverse behaviors and providing a foundation for healthy development.[138] Social-emotional skills, for example, increase girls' ability to navigate social relationships, handle challenges, and care for their own health.[139]

Girls described firsthand how RP developed and enhanced five fundamental SEL skills: self-awareness, self-management, social awareness, relationship skills, and responsible decision-making. RP was described as an iterative process of learning, practicing, and building competencies, as well as navigating and persevering through adversity. Though social-emotional skill development was analyzed as an independent theme from connectedness, girls understood their social and emotional growth and development through the experiences and relationships they constructed with others during RP.

Primarily, girls characterized RP as creating an environment that promoted self-awareness and self-expression: "[You] realize that you're not perfect, and everybody has problems, and it's okay to have problems, and most importantly, speak about those problems and . . . not keep[] them inside." They also associated RP with developing keener introspection skills. "I was that hard-headed kid that didn't want to listen; that didn't respect people. I thought I knew everything, like I had been here before. You know, [restorative practices] just opened up my

establish and maintain supportive relationships, and make responsible and caring decisions.").

135. *What is the CASEL Framework?*, COLLABORATIVE FOR ACAD., SOC., & EMOTIONAL LEARNING [https://perma.cc/2QDZ-U8MD] (last visited Oct. 29, 2022); Joseph A. Durlak, Roger P. Weissberg, Allison B. Dymnicki, Rebecca D. Taylor & Kriston B. Schellinger, *The Impact of Enhancing Students' Social and Emotional Learning: A Meta-Analysis of School-Based Universal Interventions*, 82 CHILD DEV. 405, 406, 412-13 (2011); Damon E. Jones, Mark Greenberg & Max Crowley, *Early Social-Emotional Functioning and Public Health: The Relationship Between Kindergarten Social Competence and Future Wellness*, 105 AM. J. PUB. HEALTH 2283 (2015).

136. *See* Durlak et al., *supra* note 135, at 405-06, 412-13.

137. *Id.* at 405.

138. Mark T. Greenberg, Roger P. Weissberg, Mary Utne O'Brien, Joseph E. Zins, Linda Fredericks, Hank Resnik & Maurice J. Elias, *Enhancing School-Based Prevention and Youth Development Through Coordinated Social, Emotional, and Academic Learning,* 58 AM. PSYCH. 466, 468 (2003).

139. *Id.*

eyes; like, just sitting down, you know, talking." And as their self-awareness increased, girls reported feeling more confident and empowered and better able to recognize and celebrate their own identity, agency, and resilience.

Many girls expressed that RP helped to refine their self-management skills, equipping them to control anger and other strong emotions. One stated: "In RJ [restorative justice], you reflect on what happened. And, like, sometimes you're, like, noticing, 'Wow . . . I didn't know how angry I was . . . . I have to be careful what I say.'" Another stated that RP provided her with tools to cope with challenging moments by engaging in positive "self-talk", saying to herself: "You're not that person. Tell . . . that 6-year-old girl [inside you], 'That's not you anymore.' And calm down." Such skills are critical to academic success: in multiple focus groups, girls observed that when they were in more control of their emotional lives, they could better manage their academic lives.

Girls also characterized RP as promoting social awareness, empathy, and compassion by improving listening skills. One girl described the lesson she learned through RP: "[I]f you don't really listen to another person's, like, perspective, you're never going to solve the problem because . . . you're always going to think this way, you're never going to hear the other person out." Another noted that RP provided the space to learn others' perspectives: "I stayed quiet because I wanted to hear, like, everyone's story. I wanted to, like, know what they were going through and—and, I mean, it all made sense, like why they . . . were, like, the way they are . . . I just like hearing people out and seeing if I can help them." Similarly, RP contributed to conflict-resolution skills: "When I think of restorative justice, I think of, like, there was a problem that needs to be solved and that needs to be solved in, like, a mature way where we can have a mature conversation."

D. *Mental Health and Wellbeing*

Girls also associated RP with significant improvement in their mental health. They presented examples of RP benefits that including feeling empowered, resilient, less isolated, and less depressed than they had been before engaging in RP. This helped them heal from adversity, including the trauma of sexual violence. One girl began describing her impression of RP by noting: "When people feel like they're alone, that's what leads them to, like, depression and other mental issues that can even kill them, because people just don't feel like they have anyone there for them and they don't feel like they could open up to anybody." But

girls in our focus groups reported that during restorative practices, collective support formed around students who expressed feelings of fear and helplessness. Another girl shared a story of a striking experience during a restorative circle: a peer revealed the intent to engage in self-harm, which led to an effective school intervention: "Because we did a circle and that person was able to share out what they felt, . . . the teacher—the school, was able to prevent what[] that person was trying to do to themselves."

Often, observations about RP and its effect on mental health and empowerment were made in the context of gender-based violence. Though the study was not structured to examine the relationship between gender-based violence and RP, girls in four focus groups independently credited RP with establishing a safe space that facilitated discussion of incidents of sexual violence. Consistent with studies that have confirmed that girls experience gender-based violence at far higher rates than boys,[140] some participants in our study referred to this violence—including sex trafficking—as "girl stuff."

> Girl 1: It's ... a peace circle. 'Cause it's like all girls. . . . Like we talk about sex trafficking, self-defense. We talk about, you know . . .
>
> Girl 2: Abuse.
>
> Girl 1: Yeah. Abuse, um, boyfriends. You know, just girl stuff."

Sharing the experience of sexual abuse in single-gender RP connected girls to one another, making them feel stronger and helping them begin to address some of the harmful effects of these incidents, including depression, low self-esteem, and suicidal ideation. "[I]t helped me, um, cope, and also be able to speak, like, more freely about an experience that I went through, like in an abusive relationship."

Several girls shared that RP helped them recognize, for the first time, that they had experienced gender-based violence in past and current relationships.

> [Restorative practice] [c]ircles helped me realize, like, what he did was not okay. What I did was not okay. And . . . we did

140. CATHERINE TOWNSEND & ALYSSA A. RHEINGOLD, DARKNESS TO LIGHT, ESTIMATING A CHILD SEXUAL ABUSE PREVALENCE RATE FOR PRACTITIONERS: A REVIEW OF CHILD SEXUAL ABUSE PREVALENCE STUDIES 5 (2013).

> not have good communication. The fact that it was really one-sided. . . . And I realized, like, 'I'm too good for this. You don't deserve me. Like, I'm pretty, smart, talented, like, 'What is you—what is you doing? You messing up!'"

Girls also said that RP helped them address feelings of shame—a common response to experiencing sexual violence. "[S]eeing that I'm not the only one being impacted and hurt by it, I—I actually, like, spoke about it, too. And I feel like [RP] helps a lot of women speak about what happens to them because everybody is so scared to talk about it because they're, like, 'Probably I'm the only one and I don't want to be ashamed of it.'" RP also helped girls recognize and communicate about the abuse they experienced and manage its psychological impact:

> [M]y dad was abusive, and I always kept that to myself. And now because of restorative justice I've been able to let my emotions out and build much more trust and make that story much . . . easier to cope with and to share with others."

Girls repeatedly identified the need for RP to be available separately to students who identify as female. They stated that when participants in RP are all girls, they are best able to support each other against gender-based harms. One girl stated: "[G]irl to girl, we understand each other more, you know . . . . [W]e go through the same thing." Another discussed the sense of safety that single-gender RP provides to discuss objectification and fear of assault:

> I don't think we will be able to, like, talk about things if guys were here . . . because they wouldn't know how it feels . . . walking down, like, a hallway or somewhere and just, like, feeling really anxious about it because people are staring at you. . . . [T]hey're staring at your body, not at you because you're pretty, but mostly because of, like, your body. And it's just, like, being scared of, like, walking home at, like, at night, you know? And they [boys] are scared because, like, 'Oh, they can, like, beat me up,' but . . . us [girls], it's more like 'I really hope I don't get raped, I don't get, like—like, they don't get me in the car and, like, harm me or something.'

Relatedly, girls explained that creating dedicated spaces for female students helps them support one another in reducing self-harming behaviors that

can stem from experiencing gender-based bias and stereotypes: "[G]irls, what they most likely share is about . . . being catcalled and not being able to wear what they want because society just sees them as sluts, so they don't feel comfortable with . . . themselves, or they start trying to harm themselves. Like, for example, cutting and stuff like that." Girls also described RP as a place where they could safely discuss teen parenting and women's reproductive health, including hygiene, menstruation, and miscarriages.

In part, girls indicated that their preference for single-gender RP was based on their experience of social diminishment:

> A boy's perspective about . . . sexual assault or, um, discrimination . . . is different from a . . . female. And what could hurt us or, like, nearly destroy us would be something so small and irrelevant to a male . . . And sometimes [it's helpful to hear] that you're not being dramatic and that you're not over-exaggerating or, 'you're just that girl', you know."

These findings affirm criminal justice research on the benefits of gender-specific interventions,[141] as well as studies that have shown that boys' dominating behavior in the classroom can subdue girls and normalize harmful socialized gender differences.[142] Group connections can also be central to girls' health and wellbeing by promoting emotional bonds[143] and protecting against disengagement, which can be particularly important for girls living with chronic stress and/or trauma.[144] As one girl noted: "[T]he boys are just, like, 'Did you hear what you said? Your opinion, it's wrong.' And then they were just, like, getting at me, and I feel like that's not an environment that girls would create. It's just generally men tend to be, like, a little bit more harsher just because they feel like they don't have to deal with their feelings and they could just be

141. *See, e.g.*, BARBARA BLOOM, BARBARA OWEN & STEPHANIE COVINGTON, NAT'L INST. CORR., GENDER-RESPONSIVE STRATEGIES FOR WOMEN OFFENDERS: A SUMMARY OF RESEARCH, PRACTICE, AND GUIDING PRINCIPLES FOR WOMEN OFFENDERS 2 (2005).

142. *See, e.g.*, Kathleen Lynch & Anne Lodge, EQUALITY AND POWER IN SCHOOLS: REDISTRIBUTION, RECOGNITION AND REPRESENTATION 121 (2002); NELLY P. STROMQUIST, UNESCO, THE GENDER SOCIALIZATION PROCESS IN SCHOOLS: A CROSS-NATIONAL COMPARISON 30 (2007).

143. Renée Spencer & Belle Liang, *"She Gives Me a Break from the World": Formal Youth Mentoring Relationships Between Adolescent Girls and Adult Women*, 30 J. PRIMARY PREVENTION 109, 109 (2009); SCHOENBERG ET AL., *supra* note 128, at 15.

144. Hossfeld, *supra* note 107; Stephanie S. Covington, *Women and Addiction: A Trauma-Informed Approach*, 40 J. PSYCHOACTIVE DRUGS 377 (2008).

more blunt about things, and while honesty is something that, like, women, like, are really good at."

Though they were clear about the importance of female-only RP, some identified that mixed-gender RP can be beneficial, too, by balancing power dynamics present in other school contexts:

> I feel like restorative justice gives us, like, the even playing field, because I know in life it's like, the men have more power than women, but, like, once we're in circles and when we're in restorative justice it's that everybody has the same voice. Everybody has the same power . . . . I didn't have a voice in the class and the teacher mostly called on the boys. And when it came to circle it was like no, we all have the same voice. Like there's no . . . no dominant sex here, basically. And I feel like that empowered a lot of, um, girls here.

In addition, some girls felt that engaging in mixed-gender RP could improve students' understanding of one another's perspectives: "[H]aving a male presence . . . . I think sometimes it can [be a] benefit because a lot of guys do go through . . . what we go through. . . . I mean sexual abuse, a lot of men, you know, have been raped. There are a lot of men supporting of MeToo. So, I think that if you find someone who can relate to you that it's definitely important for them to—for y'all to connect because then y'all can support each other." Another stated, "[T]here was this one kid that was saying his story, and it was pretty emotional. . . . I never thought that . . . I would see that side of . . . him, or of any guy . . . ."

Regardless of the structure or form, participants uniformly recommended that girls should have access to RP. One girl summarized:

> Restorative justice would really benefit women. . . . [R]ight now I feel so empowered because I could, like, talk of anything just, you know—[I could be] crying, and I would not be ashamed." Another student said that because of her experience with restorative practices, "[I] realized that I shouldn't let people walk all over me. And, you know, I have a voice, and . . . what I feel is how I feel. And I shouldn't hide that because someone else might not feel that way about it.

CONCLUSION

Our study highlights the importance of understanding RP as a non-disciplinary intervention that is associated with a vast array of benefits to girls' health and wellness, including positive connectedness, school climate, social-emotional literacy skills, and improved conditions for mental health, resilience, and empowerment for Black and Latina girls.

The goal of this Article, however, is not simply to present those findings; it is also to offer a critique of the current state of RP research and reform. It challenges those engaged in dismantling structural discrimination in education—whether activists or academics—to depart from the dominant formulation of research, reform narratives, and public perception, and apply a critical race feminist lens to their work. We know that the idea of accounting for the unique experiences of those with intersectional identities may be met with skepticism and even hostility. But in the words of Frederick Douglass, "[i]f there is no struggle, there is no progress."[145]

And—more than simply studying girls as a unique and valued population—we challenge the field to treat girls as experts in their own lives. Girls should be co-producers of research that puts a critical lens on gendered racial oppression in social institutions and redesigns laws, policies, and practices. Our study centers the voices and experiences of Black and Latina girls. Across the country, in rural and urban districts, and over many months, we listened to girls themselves. Having consulted with them about their experiences and learned from their analyses, our study reveals the promise of proactive, non-disciplinary RP to restructure school environments to become more responsive to intersectional needs. This, alone, is a significant contribution to the extant literature.

In addition, this study extends the work of others in the fields of health and education by showing how RP—when disassociated from school discipline in both form and function—promotes protective health factors for girls of color. It provides evidence that RP can support the mental health and wellbeing of Black and Latina girls and create spaces that build tools of resilience that can serve to counteract the complex array of systemic structures and practices that disempower, disenfranchise, and harm educational and health outcomes.

145. Frederick Douglass, West India Emancipation, (Aug. 3, 1857), *in* Univ. Rochester Frederick Douglass Project, *West India Emancipation*, RIVER CAMPUS LIBR., [https://perma.cc/R3CB-27QT].

The girls who participated in our project show that school-based RP is, above all, an environment of connection. This is true at the micro-level, by providing students with a sense of safety, trust, supportive relationships, and positive learning environments, and the macro-level, by extending beyond traditional disciplinary boundaries. But these findings only establish a foundation, not a ceiling, for work that examines RP. Future research (theoretical or empirical) should probe intersectional invisibility in RP practice, policy, as well as antiracist education movements. In addition, in line with our findings, subsequent research should examine RP as a school-based intervention and as a means of improving individual and population health outcomes. Finally, upcoming work should focus not only on the reactive frame of RP, but also its proactive possibilities.

No matter what direction is taken, placing girls and women of color at the center of antiracist education theory, research, and practice is essential.[146] Without this centrality, it is unlikely that any law, policy, or practice can truly advance equity and justice in education.

146. Theodorea Regina Berry, *Engaged Pedagogy and Critical Race Feminism*, 24 EDUC. FOUNDS. 19, 23 (2010); Adrien K. Wing & Christine A. Willis, *From Theory to Praxis: Black Women, Gangs, and Critical Race Feminism*, 11 LA RAZA L. J. 1, 1-4 (1999).