Supreme Court No. 95973-1
Court of Appeals No. 77032-2-I

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

A.J.L.,

Petitioner,

v.

EVERETT SCHOOL DISTRICT,

Respondent.

ANSWER TO PETITION FOR REVIEW

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I. COURT OF APPEALS DECISION

The Petitioner, A.L., a truant student, has asked the Court to grant discretionary review of the unanimous unpublished decision of Division 1 of the Court of Appeals *In re Matter of Truancy of A.J.L., DOB: 12/3/01, A.J.L. v. Everett School District,* No. 77032-2-I (Wash. Ct. App., May 14, 2018).

II. ISSUE PRESENTED FOR REVIEW

Did the Court of Appeals correctly affirm the decision of the Superior Court when it held that (1) Everett School District (the "District") presented sufficient evidence through a sworn declaration to support the court's findings and assertion of jurisdiction over A.L. and (2) A.L. was provided with sufficient due process at his truancy hearing?

III. STATEMENT OF THE CASE

A. The District Filed a Truancy Petition on A.L.

On February 1, 2017, as required by law, the District filed a Petition Regarding Truancy in Snohomish County Superior Court (the "Petition"). Clerk's Papers ("CP") 116. The Petition requested that the court assume jurisdiction over A.L. and A.L.'s parent and issue an order compelling school attendance under RCW 28A.225.090. *Id*.

The District filed the Petition pursuant to RCW 28A.225.030 based upon A.L.'s excessive number of absences. *Id*. The Petition listed A.L.'s

28 unexcused absences and set forth the numerous actions the District had taken to eliminate or reduce A.L.'s absences, including

- contacting A.L.'s parent multiple times,
- holding a conference with A.L.,
- conducting the Washington Assessment of the Risks and Needs of Students ("WARNS")
- providing interventions consistent with A.L.'s WARNS profile, including tutoring, remedial instruction, and morning calls, and
- referring A.L. to a community truancy board.

CP 117–18.

The Petition further stated that the actions the District had taken were unsuccessful in substantially reducing A.L.'s unexcused absences and that court intervention was necessary to assist the District in reducing A.L.'s unexcused absences. CP 118. The facts set forth in the Petition were provided under penalty of perjury by Doug Plucker, an Assistant Principal at Everett High School. CP 119. Mr. Plucker declared:

> I, Doug Plucker, am employed as a(n) Assistant Principal at the Everett School District. I declare under the penalty of perjury under the laws of the state of Washington that the above information is true and accurate and that the Everett School

> District has complied with the statutory requirements of RCW 28A.225.020.
>
> I further declare under penalty of perjury under the laws of the state of Washington that I am a custodian of or supervisor over the attendance records of this student. That these records are kept in the ordinary course of business of said school and school district, are the records that are made near or at the time of the taking of attendance, and are relied on by the school and school district for all purposes related to attendance and truancy.

On February 3, 2017, A.L. and A.L.'s parent were served with the Notice and Summons to Juvenile for Truancy Hearing by U.S. Mail. CP 114–15. On February 27, 2017, Mr. Plucker also personally served A.L. with the Petition and the Notice and Summons. CP 99–100. A.L. acknowledged his receipt of the documents. CP 100. That same day, A.L., his mother, and Mr. Plucker signed a "Behavior Contract" to "clarify the school's attendance and behavior expectations, and to help establish systems that will help the student be successful at Everett High School." CP 107.

On February 7, 2017, the Snohomish County Public Defender Association filed a notice of limited appearance and a request for discovery to the District. CP 112–13.

B. The Commissioner Finds Facts Sufficient to Declare A.L. Truant and Enters an Order to Abate Truancy

The initial hearing on the Petition was set for March 9, 2017. CP 114–15. See RCW 28A.225.035(6), (10). A.L., A.L.'s mother, and A.L.'s attorney James Owens were all present at the proceeding. CP 111. The parties agreed to continue the hearing to April 20, 2017, so that A.L. could attend an intake session at a different District high school, Sequoia High School. CP 109. The parties also agreed that A.L. would continue attending Everett High School while completing the intake process at Sequoia High School. *Id.*

The hearing on the Petition was heard on April 20, 2017 before Commissioner Jacalyn D. Brudvik. CP 85–86. A.L. was again represented by his attorney, James Owens. CP 85. Neither A.L. nor his mother attended the hearing, despite having agreed to the April 20 hearing date. *See* CP 85, 109. Commissioner Brudvik found by a preponderance of the evidence that there were "facts sufficient to enter an order to abate truancy" and entered findings and an order on the Petition. CP 85–87; 4/20/2017 Report of Proceedings 20. *See* RCW 28A.225.035(12).

C. The Superior Court Finds the District Had Taken Appropriate Steps to Abate Truancy and that Court Supervision of A.L. Is Necessary

A.L.'s attorney filed a motion to revise the Commissioner's ruling. CP 34. *See* RCW 28A.225.095. At the revision hearing on May 17, 2017,

Superior Court Judge Marybeth Dingledy gave A.L.'s attorney the opportunity to present evidence and make an offer of proof regarding the questions he claimed to have been denied the opportunity to ask at the hearing before Commissioner Brudvik. 5/17/2017 RP 35–36. A.L.'s attorney failed to subpoena any witnesses or call any witnesses to testify. A.L.'s attorney also failed to make an offer of proof of any objections or evidence he would have presented at the hearing. Judge Dingledy thus denied A.L.'s motion for revision of the Commissioner's ruling and found by a "preponderance of the evidence that the school district has taken steps as appropriate and based on those efforts, court supervision is still necessary." CP 33; *see also* 5/17/2017 RP 41.

IV. ARGUMENT

A. This Case Does Not Warrant Supreme Court Review

The Rules of Appellate Procedure state that a Petition for Review will be accepted by the Court only

> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
>
> (2) If the decision of the Court of Appeals is in conflict with another decision of the Court of Appeals; or
>
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or

(4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13.4(b).

A.L.'s Petition does not identify any one of these criteria as a basis for the Court's review. Even if one were to infer that A.L.'s basis for seeking discretionary review was that there is a significant question of law under the Constitution of the United States, there is still no reason for the Court to grant review of A.L.'s case, as A.L.'s constitutional argument is incorrect and the statute on which A.L. relies has been amended, rendering the issue moot.

B. No Significant Question of Constitutional Law Warrants Further Review

1. A.L. Was Not Deprived of a Constitutionally Protected Liberty Interest and, Moreover, Was Afforded Due Process

A state may not deprive persons of "life, liberty, or property" without providing them with "due process of law." U.S. Const. amend. XIV, § 1. Procedural due process, "unlike some legal rules, is not a technical conception with a fixed content unrelated to time, place and circumstances." *Mathews v. Eldridge*, 424 U.S. 319, 334 (1976). Rather, it "is flexible and calls for such procedural protections as the particular situation demands." *Id.* "The fundamental requirement of due process is

the right to be heard at a meaningful time and in a meaningful manner." *In re Dependency of R.L.*, 123 Wn. App. 215, 222, 98 P.3d 75, 78 (2004).

The due process a person is entitled to receive in a particular circumstance takes into account three factors: (1) "the private interest that will be affected by the official action"; (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards"; and (3) "the [g]overnment's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Mathews*, 424 U.S. at 335. Here, A.L.'s claim fails at the threshold because he was not deprived of his liberty or any constitutionally protected interest. Moreover, a weighing of these factors shows that A.L. received the due process to which he was entitled.[1]

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[1] A.L. bases his argument on the proceedings before Commissioner Brudvik, rather than those before Judge Dingledy. *See, e.g.*, Petition for Review at 4 (citing to Report of Proceedings before Commissioner Brudvik); *id.* at 3 (citing to Commissioner Brudvik's order). The proceedings before Judge Dingledy and Judge Dingledy's findings and order, however, are the appropriate subject for review. Opinion at 5.

2. A.L. Was Not Deprived of a Constitutionally Protected Liberty Interest

The first factor of the *Mathews* balancing test looks to the private interest involved. *See* 424 U.S. at 335. This factor also presents a threshold requirement: The party claiming a due process violation must show that he was deprived of a constitutionally protected interest. *See, e.g.*, *Bloodworth v. City of Phoenix*, 26 F. App'x 679, 681 (9th Cir. 2002) ("To demonstrate a violation of their procedural due process rights, Plaintiffs must show that Defendants deprived them of a constitutionally protected property or liberty interest. . . . The district court properly granted summary judgment on Plaintiffs' due process claim because Plaintiffs fail to make a sufficient showing on the threshold question of a deprivation."); *Barnhouse v. Glebe*, No. 07-1991-MJP-JPD, 2008 WL 5263716, at *7 (W.D. Wash. Dec. 17, 2008) ("A court encountering a procedural due process claim must first determine whether the plaintiff has been deprived of a liberty or property interest that is constitutionally protected as a matter of substantive law.").

Here, A.L. raises the specter of a potential deprivation of liberty, but does not argue that he was, in fact, deprived of any constitutionally protected liberty interest. *See* Petition for Review at 6–7. The record confirms that A.L. was not deprived of any such interest. Neither

Commissioner Brudvik's nor Judge Dingledy's orders required A.L. to be placed in a crisis residential or HOPE center. *See* CP 33, 85–86. A.L.'s due process claim fails for this threshold reason alone.

3. The Procedures Used Created Little Risk of Erroneous Deprivation, and Additional or Substitute Procedures Would Have No Value

The second factor in the *Mathews* test also supports the conclusion that A.L. was not deprived of due process of law in the proceedings below: the procedures that were used provided little risk of erroneous deprivation, and additional or substitute procedures would not reduce the risk. *See* 424 U.S. at 334.

As the Court of Appeals held, A.L. was afforded a robust process that more than adequately protected his due process rights. Opinion at 8-12. A.L. was provided with adequate notice of the original hearing date, at which he appeared, and he agreed to the continued hearing date. CP 99–100, 109. He was served with the Petition on February 3, 2017, months in advance of the April 20, 2017 hearing, and was represented by counsel from February 7, 2017, through his appeal. *See* CP 15 (A.L.'s attorney giving District notice of appeal). A.L. and his counsel had ample opportunity to conduct discovery, call witnesses or marshal evidence contradicting the statements in the Petition, which were given under penalty of perjury by a District administrator. *See* CP 99–100, 113, 116–

18. A.L. was represented by counsel at the hearings before Commissioner Brudvik on March 9, 2017 and April 20, 2017, and on the motion for revision before Judge Dingledy on May 17, 2017. CP 33, 85.

A.L. elected not to appear at the April 20, 2017 hearing before Commissioner Brudvik or the May 17, 2017 hearing before Judge Dingledy. A party's choice not to avail himself of the procedures made available does not constitute a due process violation. *See In re Dependency of A.G.,* 93 Wn. App. 268, 279, 968 P.2d 424, 430 (1998), *as amended on reconsideration* (Feb. 1, 1999) (no due process violation in termination of parental rights when parent had notice but chose not to appear); *see also Alvin v. Suzuki*, 227 F.3d 107, 116 (3d Cir. 2000) ("In order to state a claim for failure to provide due process, a plaintiff must have taken advantage of the processes that are available to him…."); *Dusanek v. Hannon*, 677 F.2d 538, 543 (7th Cir. 1982) ("[A] state cannot be held to have violated due process requirements when it has made procedural protection available and the plaintiff has simply refused to avail himself of them."). Moreover, although A.L. chose not to appear, he was represented by counsel at every stage of the proceedings. *See generally* 4/20/2017 RP; 5/17/2017 RP; *see also* CP 33, 85–86.

A.L.'s contention that he was subject to a default judgment on the Petition misrepresents the proceedings below. See Petition for Review at

8–10. Both Commissioner Brudvik and Judge Dingledy reviewed the Petition and found that the necessary elements to declare A.L. truant had been established by a preponderance of evidence through the Assistant Principal's sworn declaration. Commissioner Brudvik reviewed the Petition and found by a preponderance that there were facts sufficient to enter an order finding A.L. truant. 4/20/2017 RP 19–20 (The court: "I've gone through and looked at the petition . . . . I'm going to find there's facts sufficient to enter[] an order and I shall do so. . . . I've gone through everything that I've reviewed and this is preponderance of the evidence and I'm finding preponderance of the evidence."). On the motion for revision, Judge Dingledy considered A.L.'s counsel's evidentiary objection and legal arguments and nonetheless concluded that the necessary elements to assert jurisdiction over A.L. were established by a preponderance of the evidence. *See* 5/17/2017 RP 41 (agreeing with A.L.'s counsel that the court was finding by a preponderance of the evidence that the school district had taken appropriate steps and that based on those steps and interventions, court supervision was still necessary); *see also* CP 33. In sum, Judge Dingledy's order was not entered by default, but rather was based on a review of the evidence and factual findings by a preponderance of the evidence. Opinion at 11.

A.L.'s proposed additional safeguard is a mandatory evidentiary hearing on every truancy petition. *See* Brief of Appellant at 12. As an initial matter, the statute does not require an evidentiary hearing, contrary to A.L.'s assertion. Instead, the statute refers only to a "hearing." *See generally* RCW 28A.225.035 (consistently using "hearing," not "evidentiary hearing"). The legislature has used "evidentiary hearing" when that is what it intends. *See, e.g.*, RCW 74.34.135 (providing for evidentiary hearings related to protection of vulnerable adults); RCW 88.04.055 (allowing for evidentiary hearings under certain circumstances under the Charter Boat Safety Act). The procedure set forth by RCW 28A.225.035, which does not require an evidentiary hearing, is presumed to be constitutional, and A.L. has the burden of overcoming this presumption. *See Bellevue Sch. Dist. v. E.S.*, 171 Wn.2d 695, 704, 257 P.3d 570, 575 (2011) (RCW 28A.225.035(10), "like most statutes, is presumed to be constitutional, and the burden of overcoming that presumption resides with the challenger.").

A mandatory evidentiary hearing would not reduce the risk of erroneous deprivation. This case provides a chief example. Here, the District's Petition set forth the statutorily required information under penalty of perjury. CP 116–42. A.L. was not present to testify and dispute the sworn testimony, but he was represented by counsel and his

counsel could have called the District's declarant to be cross examined, requested or subpoenaed other witnesses to appear, or offered other evidence. A.L.'s counsel did none of those things. Indeed, A.L.'s counsel was given multiple opportunities to rebut or undermine the District's evidence, but provided no concrete reason for the commissioner or the judge to conclude that any of the statements by the District were incorrect. Before Commissioner Brudvik, A.L.'s counsel did not attempt to offer any evidence or testimony, but instead simply argued that the "declaration is not sufficient." 4/20/2017 RP 21.

On the motion for revision, Judge Dingledy gave A.L.'s counsel multiple opportunities to make an offer of proof, but A.L.'s counsel made none. *See* 5/17/2017 RP at 35–36 (The court: "So do you want to make an offer of proof as to what questions you were denied asking at that last hearing?"); *id.* at 36 (A.L.'s counsel: "[S]o aside from my inability to actually just carry out a fact-finding hearing in which I could attack the issues within the petition, there is the additional issue that . . . I was essentially barred from raising objections and putting them in the record."; the court: "So this is your chance to do that, if you'd like."). Despite these opportunities, A.L.'s counsel did not offer any evidence that contradicted the sworn statements in the District's Petition, but only speculation and general assertions that he could have identified deficiencies and made

objections based on the Rules of Evidence. *See* 5/17/2017 RP 35–36. A mandatory evidentiary hearing would not have altered the outcome of the truancy hearing and would not, as a general matter, reduce the risk of erroneous deprivation. Opinion at 11-12. The second *Mathews* factor counsels against requiring an evidentiary hearing.

4. The Government Has an Interest in Ensuring School Attendance and in the Efficient Determination of Truancy Petitions

The third *Mathews* factor "considers the government's interest, including the fiscal and administrative burden of providing additional procedural safeguards." *City of Redmond v. Moore*, 151 Wn.2d 664, 687, 91 P.3d 875, 887 (2004). The government's interest weighs heavily against requiring an evidentiary hearing on every petition regarding truancy.

Washington's compulsory school attendance laws show the State's interest in ensuring regular school attendance and set forth the procedures for the districts and courts to follow in order to promote that interest, which were followed in this case. *See generally* Chapter 28A.225 RCW. The State also has an interest in keeping costs and administrative burdens associated with additional procedures low. *See, e.g.*, *State v. Derenoff*, 182 Wn. App. 458, 467, 332 P.3d 1001, 1005–06 (2014) ("[T]he governmental interest, including costs and administrative burdens of

additional procedures—weighs heavily in favor of the State."). There is also a governmental interest in "[m]aintaining the trial court's discretion to efficiently address" the issues before it. *State v. Beaver*, 184 Wn. App. 235, 250, 336 P.3d 654, 662 (2014) (quoting *Derenoff*, 182 Wn. App. at 467), *aff'd*, 184 Wn.2d 321, 358 P.3d 385 (2015).

Here, the additional procedure proposed by A.L.—a mandatory evidentiary hearing with live testimony in all truancy proceedings—would require school district employees to appear and repeat the same information provided already by way of a petition signed under penalty of perjury by school district administrators. This procedure would needlessly require principals and assistant principals to take time away from their schools to attend hearings when no challenge to the petition was presented. In addition, a mandatory evidentiary hearing would likely lead to school districts needing to hire counsel, rather than being represented by someone who is not an attorney. See RCW 28A.225.035(10). Mandatory evidentiary hearings would also require additional time and resources from the courts hearing these petitions and would restrict the court's discretion to tailor each hearing to the circumstances before it. The governmental interest therefore counsels against adopting a requirement of a mandatory evidentiary hearing. Opinion at 13.

In summary, A.L. has not met the threshold requirement for a procedural due process claim—deprivation of a constitutionally protected interest. Moreover, the *Mathews v. Eldridge* factors do not support a mandatory evidentiary hearing—the additional procedure proposed by A.L. This procedure would not materially reduce the risk of erroneous deprivation and would substantially increase the burdens on schools and the courts. Accordingly, A.L.'s due process claim does not provide a basis for overturning the decision below.

5. The Statute at Issue, RCW 28A.225.090, Has Been Amended to Eliminate Placement at a Residential Center and the Issue Raised by A.L. Is Moot

At the time of the hearing on A.L.'s truancy petition, RCW 28A.225.090(1)(f) provided that

> [a] court may order a child subject to a petition under RCW 28A.225.035 to . . . [s]ubmit to a temporary placement in a crisis residential center or a HOPE center if the court determines there is an immediate health and safety concern, or a family conflict with the need for mediation.

Second Sub. H.B. 2449, 64th Leg., Reg. Sess., (Wash 2016). *See* Laws 2016 ch. 205, § 9 (effective June 9, 2016). The statute was amended in 2017 and the provision was removed from RCW 28A.225.090(1). Second Sub. H.B. 1170, 65th Leg., Reg. Sess., (Wash 2017). *See* Laws 2017 ch. 291, § 5 (effective July 23, 2017).

Accordingly, the argument made by A.L. is moot and will not recur. The District never asked for and the superior court never ordered A.L. to be placed in a crisis residential center or a HOPE center. With the amendment of RCW 28A.225.090, no student will face the possibility of a temporary placement in a crisis residential center or a HOPE center at an initial truancy hearing. Review by the Supreme Court is therefore unnecessary. See *Bellevue Sch. Dist.*, 171 Wn.2d at 698 n.1.

V. CONCLUSION

For the reasons set forth above, the District respectfully requests that the Court deny A.L.'s Petition for Review of the Court of Appeals decision.

DATED: July 13, 2018

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