# TRUANCY TROUBLES CHRONIC ABSENTEEISM IN THE BADGER STATE

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# **Executive Summary**

Since the COVID-19 pandemic, there has been a growing trend across the nation of students being absent from school. Missing substantial amounts of school can have negative implications for the intellectual and social development of students. But how big is this problem in Wisconsin? To answer that question, we gathered several years of data on truancy from school districts across the state. In short, Wisconsin mirrors national trends, but there are bright spots and areas for particular concern.

Among the key findings of this report:

- Chronic Absenteeism in Wisconsin has more than doubled since 2012. About 10% of students were chronically absent in 2012 compared to more than 20% today.
- Wisconsin is middle-of-the-pack when it comes to rates of chronic absenteeism. The state ranks 24<sup>th</sup> overall in terms of the lowest rate.
- Low-performing districts have some of the highest absenteeism rates. Beloit, Racine, and Milwaukee are among the districts with the lowest Forward Exam proficiency, but highest absenteeism.
- Some municipalities don't have local ordinances for truancy. Of the fifty principal
  municipalities containing districts with the highest truancy rates, 14 have no local truancy
  ordinance.
- The most rural districts suffer from high absenteeism. Like their urban counterparts, sparsely populated districts see significantly higher absenteeism rates than other districts.
- Making schools safer is a key to increasing attendance. When students don't feel safe in school, they are less likely to attend. Replacing discipline policies that let students get away with misbehavior with policies that protect students and teachers is a key to fixing absenteeism.

# Introduction

In the aftermath of the COVID-19 pandemic, there has been increased attention to the number of days that students are missing from school. Nationally, at least 16 million school-age children—about one third of all children in this group—missed more than 10% of school days during the 2021-22 school year. In order for students to learn and succeed, it is critical that they be regularly present in the classroom, particularly in light of the learning loss that has been experienced after a year or more of at-home education for many children.

In this paper, I examine where Wisconsin stands in terms of absenteeism rates. We look at national and district-level data to highlight which parts of the state are doing well, and which need improvement. In the end, we find that absenteeism rates vary widely around the state. And while the rates are correlated with some expected factors, there are some districts saddled with those challenging factors that are nevertheless "punching above their weight" and can therefore serve as a model for others.

# Why Does it Matter?

When a student misses significant amounts of school, the effect on their overall education can be dramatic. A 2018 study<sup>iii</sup> that used national data found that students who missed 3-4 days of school or more saw, on average, a 0.33 standard deviation reduction in their math scores. For students who miss 10 or more days, that loss grew to 0.66 standard deviations. Similar results have been found in other studies. One study of North Carolina schools<sup>iv</sup> estimated that a reduction of absences by 10 days would result in a 5.5% increase in math outcomes, and a 2.9% increase in reading outcomes. And the effects of absenteeism may reach beyond academic performance, to mental health: another study found that high rates of absenteeism are related to thoughts of suicide and self-harm.<sup>v</sup>

For this paper, we will apply the Department of Public Instruction (DPI) definition of "Chronic Absenteeism" to examine truancy. While in the past, students' missing school was evaluated with the term "Truancy," this word has generally been replaced with a measure known as "Chronic Absenteeism." This measure, aligned with federal standards under the "Every Student Succeeds Act" (ESSA), defines a student as chronically absent if they are enrolled in a school for more than 90 days and attend less than 90% of those days. The truancy metric had attempted to account for whether a student's absence from school was excused or not, but the new measure only counts total absences from school, whether excused or not."

# Truancy Statutes in Wisconsin

In this section, we examine Wisconsin's truancy statutes, which are covered in both criminal and education chapters.

# *Wis. Stat.* § 948.45

The criminal statute states that anyone 17 or older who, either by act or omission, encourages or contributes to truancy of a person under 17 is guilty of a Class C misdemeanor.

# Wis. Stat. § 118.15

In Wisconsin, there are two primary sets of education statutes related to truancy, along with four additional statutes that touch upon attendance and truancy matters. One of the central legal provisions addressing compulsory attendance and defining what constitutes an absence is found in Wis. Stat. § 118.15. This statute outlines the requirement that parents or guardians must ensure regular and full-time school attendance for their children between the ages of five (if the child participates in 5-year-old kindergarten) and 18, during school sessions. The legal responsibility for ensuring attendance ceases at the conclusion of the school year in which the child turns 18. It's important to note that compulsory attendance rules are applicable to both public and private schools, as well as tribal schools, but they do not extend to students enrolled in virtual charter schools.

Under § 118.15, there are several scenarios where full-time "compulsory attendance" can be excused or modified. The allowable scenarios include a child attending a technical college, a program that leads to a high school equivalency diploma, or a modification in the child's curriculum or program. A curriculum or program modification can include enrollment in an alternative public school or program, enrollment in any nonsectarian private school or program, enrollment in a tribal school, enrollment in any public educational program outside the district the child resides, or any homebound study.

The statute also delineates the requirements and guidelines for excused absences due to illness and parentally approved absences. A school board may grant an excused absence when a child is temporarily unable to attend school due to physical or mental health reasons, with the expectation that the child will return to the regular school program within 30 days. However, this period of excused absence should not extend beyond 30 days, or the conclusion of the current school year. To obtain an excused absence, both a written note from a parent or guardian and a medical practitioner are required.

Importantly, this section of the statute specifies that a child's truancy, disciplinary issues, or academic performance problems cannot serve as a basis for seeking an exemption from compulsory attendance or the related regulations. Furthermore, pregnant girls cannot be compelled to withdraw from their school program by the school board or governing agency. In cases where a child is excused from attending school with written consent from their parent or guardian, the child is obligated to complete any missed coursework. It's worth noting that a child

may not be excused for more than ten days under these provisions.

If a parent or guardian is found guilty under the criminal statute, Wis. Stat. § 948.45, or violates Wis. Stat. § 118.15, they can be penalized as follows: (1) first offense is a fine of <\$500 or imprisonment for up to thirty days, or both; (2) second offense is a fine of <\$1,000 or imprisonment of up to ninety days or both; (3) the court may require community service in lieu of penalties; (4) the court

may order any person who violates the compulsory attendance statute into counseling at the person's own expense, or attend school with his or her child, or both. If the defendant proves he or she is unable to comply with the law because of the disobedience of the child, then the action shall be dismissed and the child shall be referred to the court.

There have been several cases that have impacted the interpretation of Wisconsin's truancy laws over the years, primarily *State v. Yoder* and *State v. Kasuboski*. In *State v. Yoder*, 49 Wis. 2d 430, 182 N.W.2d 539 (1971), the Court determined that compelling Amish parents to send their children to high school infringed upon their religious liberties. In *State v. Kasuboski*, 87 Wis. 2d 407, 275 N.W.2d 101 (Ct. App. 1978), the court determined that a parent's refusal to send children to school based on alleged religious grounds was a personal, philosophical choice by the parents, rather than a protected religious expression.

# Wis. Stat. § 118.16

While Wis. Stat. § 118.15 establishes mandatory attendance requirements, Wis. Stat. § 118.16 dictates how schools enforce it. Under Wis. Stat. § 118.16, "truancy" means a student is absent all or part of one or more days from school during which the school attendance officer, principal, or teacher has not been notified of a legal cause of such absence.

Under Wis. Stat. § 118.16, a child is "habitually truant" if the child is absent from school without an acceptable excuse for all or part of five or more days of school during any given semester. Teachers are to submit to the school attendance officer their attendance roles on a daily basis. No public school, under this statute, can deny a student credit in any course or subject solely because of the pupil's absences or suspensions from school.

Additionally, school boards are to establish a written attendance policy specifying the reasons for which a pupil may be permitted to be absent from public school, and must provide these policies to each student. The school board may establish policies that provide detention or a supervised directed study program. When a school board does not count a suspension as an excused absence, under the state statute a suspension cannot be used as an "acceptable excuse" or "legal cause" for the absence when counting days missed for a charge of habitual truancy. The child who was absent because of a suspension will have those days absent because of the suspension counted toward the truancy standard of five days in any given semester.

Schools can initiate a court proceeding against a habitually truant child or their parent/guardian if certain criteria are met. Mainly, the school must provide evidence that appropriate school personnel have, within the school year when the truancy occurred, done all of the following: (1) attempted to meet or met with the child's parent/guardian to discuss the child's truancy; (2) provided an opportunity for educational counseling to the child to determine whether a change in the child's curriculum would resolve the child's truancy; (3) evaluated the child to determine whether learning problems may be a cause of the child's truancy, and, if so, have taken steps to overcome the learning problems; and (4) conducted an evaluation to determine whether social problems may be a cause of the child's truancy.

Court proceedings can be brought without the four previous requirements if the parent was notified via email or phone call, and or if the school attendance officer provides evidence that the appropriate school personnel could not carry out the activity due to the child's absence in school. Once the requirements are met, a school attendance officer may file information on any child who continues to be truant with the court. Filing the information on a child does not prohibit concurrent prosecution of the child's parent or guardian. If any school district administrator, principal, teacher, or school attendance officer violates Wis. Stat. § 118.16, they must forfeit between \$5 and \$25.

A school attendance officer who determines a child is habitually truant may also designate any of the following individuals to take a child who resides in the district, and who has been absent from school without acceptable excuse, into custody: (1) an employee of the school district who is directly involved in the provision of educational programs to the truant child; (2) an employee of the school district who is directly involved in the provision of a modified program or curriculum, a program for children at risk, or an alternative educational program; (3) a social worker employed by the school district; (4) an employee of social l services who is directly involved in the provision of social services to the truant child or the child's family; and (5) a school attendance officer.

### Other Statutes

Besides § 118.15 and § 118.16, there are several tangential statutes that deal with truancy. § 118.153 provides that habitual truants, or "dropouts," are considered "children at risk" for purposes of risk-programs. § 118.155 says that a school board must permit students who have written permission from a parent or guardian to be absent from school between 60 and 180 minutes per week to obtain religious instruction outside the school during required school hours. The religious instructor under this statute is to report monthly to the principal of the school the names of the students who attended such weekly instruction.

Wis. Stat. § 118.162 states that at least once every four years, in every county, the school district administrator shall convene a committee to review and make recommendations to the school boards of all the school districts in the county on revisions to the school district's truancy plans. Then, at least once every two years, the school board will review and, if appropriate, revise the truancy plan.

### **Local Ordinances**

Under Wis. Stat. § 118.163 a county, city, village, or town can enact it's own laws to prevent truancy. We examined the principal municipality for the fifty districts with the highest truancy rates. At the municipal level, there is a great deal of variation on the extent to which districts have no specific truancy policy, adopt the state statute, or create their own punishments. We analyzed the home municipality for fifty school districts in the state with the highest rates of chronic absenteeism to see what laws were in place in each.

Table 1. Count of Municipal Truancy Ordinances (50 Highest Truancy Districts)

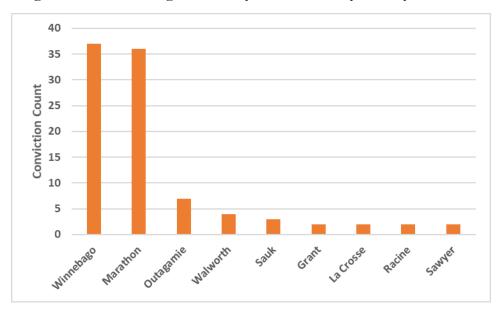
Category	Count
Adopts State Law	12
County Ordinance	5
Follows State Law	11
Local Law	8
No Mention	14

23 districts either adopt state law or cite state law in their statutes. An additional 5 districts are in counties that have an ordinance on the books. 8 districts have their own municipal law, while 14 districts have no mention of truancy whatsoever in the documents we examined. See the appendix for a complete listing of ordinance status by municipality. A full analysis of these ordinances can be found in Appendix 1 at the end of this report.

# **Truancy Prosecutions**

In most of Wisconsin, actual charges under the state's truancy laws are quite rare. The most common charge is under Wis. Stat. § 948.45 for contributing to the truancy of a minor. This charge has been levied 359 times between 2018 and 2022, with only 109 eventual convictions. Will A very small number of counties contribute to the overall numbers. Figure 1 depicts the nine counties where the most convictions for truancy occurred.

Figure 1. Contributing to Truancy Convictions by County, 2018-2022



Winnebago and Marathon County account for the largest share of convictions in the state. After these two, the drop off is substantial. After Sawyer County with 2 convictions, no other county has more than one. A number of large counties—including Milwaukee County—have 0 convictions (as well as no charges filed). We did not examine how many municipal charges have been levied as a part of this report.

# **National Data**

Nationally, data does exist on chronic absenteeism both pre- and post-pandemic. However, significant concerns exist about the quality of data that was gathered during the 2020-21 school year—the most recent year for which data is available. As detailed by The74, states varied in the stringency of their attendance measures during the pandemic. For that reason, the figure below presents the last pre-pandemic data, i.e. from the 2018-19 school year.

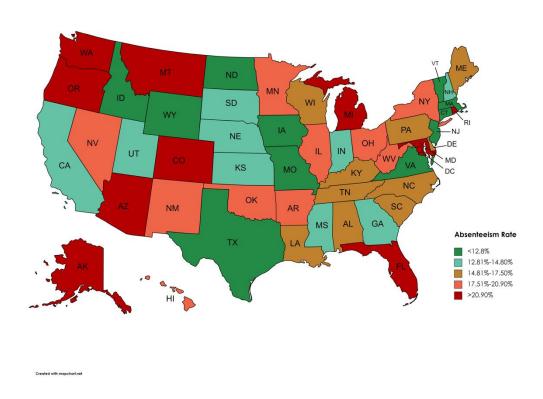


Figure 2. Chronic Absenteeism Rate by State, 2018-19

In the national dataset, Wisconsin ranks in the middle of the pack (24<sup>th</sup> lowest overall) with a reported chronic absenteeism rate of 15.3%. In the post-pandemic measurement, Wisconsin looks relatively better, with the 16<sup>th</sup>-lowest overall rate of absenteeism—though as already discussed there are problems with this data.

# Wisconsin Data

At the state level, we have the means to make better comparisons over time. DPI has retroactively applied the ESSA definition of Chronic Absenteeism to years of data that came prior to its passage at the federal level. Figure 2 shows the percentage of students who were reported to be chronically absent for each school year beginning with 2012-13.

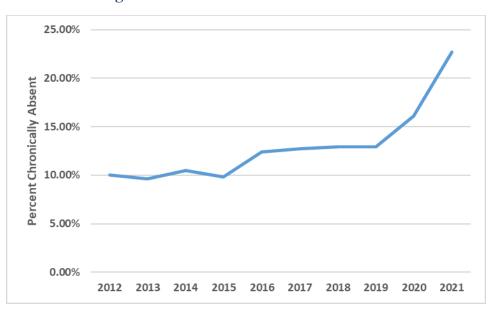


Figure 3. Chronic Absenteeism Over Time

Over the past decade, the rate had essentially plateaued with one bump in 2016—but the rate took a dramatic turn upwards during the 2021-22 school year. Chronic absenteeism in that year, the first year that most school districts were fully in-person post-pandemic, went up to 22.7%. There are many potential reasons for this, though they are mostly speculative. Perhaps a year of school at home made it hard for some students and families to get back into the swing of daily school attendance. Evidence for this lifestyle preference might be seen in the desire of many adults to continue working from home post-pandemic. But given the extremely negative consequences of schools failing to re-open for students, it his is a trend that needs to be reversed.

# **Predictors of Chronic Absenteeism**

In this section we use data from the most recent Forward Exam to examine what demographic and school-level factors are predictive of higher rates of chronic absenteeism.<sup>1</sup> The factors that show up

<sup>&</sup>lt;sup>1</sup> Note that the report card's measure of chronic absenteeism is over the past two school years, while the other data is measured in the current year. However, given the slow manner in which demographic patterns shift in schools, we think this variable is still serviceable.

as significant here are consistent with what has been found in national research. The higher the share of African American students in a school, the higher the rate of absenteeism is expected to be. Similar results are found for the rate of students with disabilities, and the share of low-income students.

Table 2. Correlates of Chronic Absenteeism

	(1)
VARIABLES	Absentee Rate
African American	33.41***
	(8.932)
Hispanic	8.461
	(9.202)
Disability Rate	32.07**
	(12.76)
English Learner	-15.08
	(15.59)
Low Income	19.92***
	(2.804)
K-8	-2.868**
	(1.408)
High School	4.110
	(2.523)
Enrollment (1000s)	0.306***
	(0.104)
Sparsity Aid	-2.002***
	(0.768)
Constant	3.615**
	(1.577)
Observations	411
R-squared	0.376
Standard among	in naronthagas

Standard errors in parentheses \*\*\* p<0.01, \*\* p<0.05, \* p<0.1

Enrollment in 1000s is also significant, indicating that districts with higher enrollment tend to have higher rates of absenteeism. However, the coefficient here is quite small (0.355) when compared to some of the others in this analysis, indicating district size is a minor factor overall. One variable that may need some explanation here is "Sparsity Aid." This variable is included to capture the most

rural districts in the state. It is provided to districts with less than 1,000 students and less than 10 students per square mile. These districts also see higher rates of absenteeism than others.  $x^{ii}$ 

# **Best and Worst Districts**

Table 3 shows the ten districts with the highest and lowest absenteeism rates on the most recent report card. Districts that only serve grades K-8 are denoted with (EO) in the table. The variation seen here is quite extreme—from just over 1% in Wauzeka to nearly half of the students in Racine. Of note is that many of the districts with the lowest rates of absenteeism are elementary-only districts—suggestive of the fact that students tend to skip school significantly more as they age and parental oversight declines. Many of Wisconsin's largest-enrollment school districts are found at the top, along with Milwaukee suburbs. Our previous analysis shows this is likely due more to demographic factors than pure size.

Table 3. Highest & Lowest Absenteeism Rates, 2020-21 & 2021-22 School Year

District	Absentee Rate	District	Absentee Rate
Racine Unified	47.60	Wauzeka-Steuben	1.40
Beloit	46.80	Stone Bank	1.80
Milwaukee	44.70	Paris J1 (EO)	2.30
Ashland	44.40	Swallow	2.30
Green Bay Area Public	41.80	Kohler	2.60
Brown Deer	41.10	Richmond	2.60
Adams-Friendship Area	40.50	Raymond #14 (EO)	2.80
Manitowoc	40.40	Rib Lake	2.90
West Allis-West Milwaukee	39.30	North Cape	3.10
Cudahy	37.60	Tomahawk	3.20

One more analysis is possible, given what we have learned in the previous section about the predictors of absenteeism. Using this data we can determine which districts, given their demographics, do a better (or worse) job than expected.

The results in Table 2 were used to create predicted absenteeism rates for each district. To put it simply, the coefficients on the variables in Table 2 allow for an estimate to be created for each school district's absentee rate based on their values on certain variables. For example, a district with

more students with disabilities would be expected to have a higher absentee rate because disability rates were found to be positively correlated with absenteeism. These predictions were then subtracted from the actual absenteeism rate in the district to arrive at an under- or over-performance number. The top and bottom ten districts on this metric are reported in Table 3.

For once, Milwaukee rises to the top in an analysis. This underscores the challenging demographics that the district deals with, even if a 45% rate of absenteeism is certainly still nothing to celebrate. Some rural school districts also appear in the left-hand (most overperforming) column. This is likely because relatively high poverty in these districts leads to a prediction of higher absenteeism that they overcome. Beloit is the only district to appear on the negative side in both Table 2 and Table 3, suggesting that this district is doing a particularly poor job in getting students to come to school.

Table 4. Predicted vs. Actual Absentee Rate

District	Absentee Rate	Predicted	Difference	District	Absentee Rate	Predicted	Difference
Milwaukee	44.70	64.04	-19.34	Frederic	30.8	15.99	14.81
Wauzeka-Steuben	1.40	19.08	-17.68	Beloit	46.8	31.92	14.88
Mercer School	4.50	20.42	-15.92	Webster	34.9	18.96	15.94
Glendale-River Hills	12.10	27.64	-15.54	Lakeland UHS	33.2	17.07	16.13
Prairie du Chien Area	5.30	20.50	-15.20	Middleton- Cross Plains Area	31	14.41	16.59
Juda	4.50	19.28	-14.78	Washburn	32.7	15.43	17.27
Tomahawk	3.20	17.81	-14.61	Solon Springs	34.9	17.52	17.38
Abbotsford	7.80	22.13	-14.33	Fontana	26	8.55	17.45
Horicon	6.00	20.22	-14.22	Manitowoc	40.4	21.25	19.15
Alma Center	5.00	19.18	-14.18	Ashland	44.4	23.01	21.39

# Biggest Shifts

It is also important to look at which districts have seen the biggest changes in their rates of chronic absenteeism in recent years. Here, we compare the rates from the 2016-17 school year with the rates from the 2021-22 school year. Figure 4 shows the data for each of Wisconsin's school districts that existed in both 2016 and 2022. Bars below 0 would indicate districts where chronic absenteeism

declined during that time, while bars above 0 indicate where it has increased. Only 46 districts saw lower absenteeism in 2022 than in 2016, while the rest saw increases.

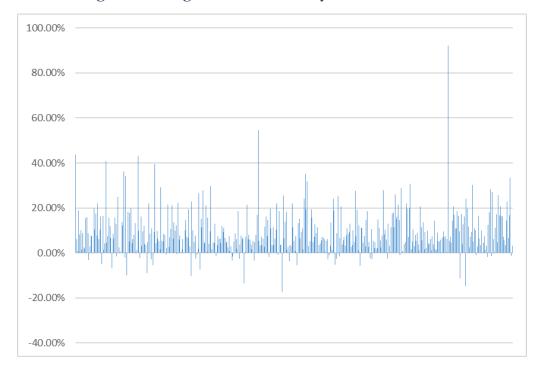


Figure 4. Change in Absenteeism by District—2016-2021

Table 5 lists the 10 districts with the largest increases in chronic absenteeism during this time period. Three Lakes reported an absentee rate of about 7% in 2016-17, and over 99% in 2021-22. There is obviously a caveat that something could be wrong with the data from this district, but if not this is a staggering shift.

Table 5. Districts with Largest Increase in Absenteeism

District	2016 Rate	2022 Rate	Change in Absentee Rate
Three Lakes	7%	99%	92%
Lac du Flambeau #1	5%	60%	55%
Beloit	15%	56%	41%
Crivitz	9%	48%	39%
Brown Deer	12%	48%	36%
Woodruff J1	6%	39%	33%
Waterloo	6%	36%	30%
Goodman-Armstrong Creek	17%	47%	30%
Weston	13%	41%	28%
Genoa City J2	5%	33%	28%
Racine Unified	25%	53%	28%

# What Can Be Done?

Some might argue that the power of schools and school districts to ensure students come to class is quite limited. This is of course true to some extent, but research shows that school districts *can* intervene to improve attendance rates.

In particular, there is conventional wisdom, especially among low-income parents, that attendance in early grades is less critical than, say, high school attendance.xiii But the reality is largely the opposite: students who fall behind early in subjects like reading are often never able to catch back up. Therefore, a campaign focused on making parents aware of how critical early education is could prove beneficial.

Another key factor in reducing absenteeism is making sure that students feel safe in school. A number of studies over the years have found that a negative school environment, xiv or even news of recent school violence, xv lead to higher rates of absenteeism. WILL has done extensive work over the years on the ways that politically correct discipline policies have harmed school safety. xvi Moving away from softer discipline policies and returning resource officers to schools where needed could improve not only safety, but also attendance.

If the goal is to tighten up truancy regulations, lawmakers should be cognizant not to sweep up students who are using alternative means of education in the process. Students in homeschools, or learning pods are still being educated, and care must be taken to not create new definitions of truancy or penalties that include them.

# **Conclusions**

The first step in the education of a student is them being present to absorb the material. But when a student is regularly not in school, this process breaks down. Getting kids into school on a daily basis is a responsibility shared by school districts and parents. While there is no one change that can magically reverse the downward trend in attendance, it is vital that this issue be at the forefront for policymakers concerned about the education of the next generation.

# Appendix 1. Local Truancy Ordinances—50 Highest Absenteeism Districts

District	Summary	District	Summary
Ashland	Local Law	Marinette	Follows state law
Baraboo	Local Law	Marshall	Adopts state law
Bayfield	Local Law	Menominee Indian	No mention of truancy
Beecher-Dunbar-	County Ordinance	Milwaukee	Local Law
Pembine			
Beloit	Follows state law	North Lakeland	No mention of truancy
Bowler	County Ordinance	Osseo-Fairchild	No mention of truancy
Brown Deer	Follows state law	Palmyra-Eagle Area	Adopts state law
Butternut	No mention of truancy	Racine Unified	Follows state law
Crandon	Follows state law	Richland	No mention of truancy
Crivitz	Local Law	Rio Community	Follows state law
Cudahy	No mention of truancy	Saint Francis	No mention of truancy
Dodgeland	Adopts state law	Sauk Prairie	Local Law
Drummond Area	Adopts state law	Solon Springs	No mention of truancy
Elcho	County Ordinance	Three Lakes	Follows state law
Flambeau	County Ordinance	Two Rivers Public	Adopts state law
Frederic	Follows state law	Walworth J1	No mention of truancy
Genoa City J2	Adopts state law	Washburn	No mention of truancy
Goodman-Armstrong	Follows state law	Waterloo	No mention of truancy
Creek			
Green Bay Area Public	Adopts state law	Westfield	No mention of truancy
Independence	County Ordinance	Weston	No mention of truancy
Kenosha	Follows state law	Wheatland J1	Adopts state law
Lac du Flambeau #1	Local Law	White Lake	No mention of truancy
Lakeland UHS	Adopts state law	Wild Rose	No mention of truancy
Madison Metropolitan	Follows state law	Woodruff J1	No mention of truancy

### **Endnotes**

i https://news.yahoo.com/too-many-kids-are-chronically-absent-how-can-schools-bring-them-back-153547903.html

ii https://www.msn.com/en-us/news/politics/covid-learning-loss-is-a-five-alarm-fire-terry-schilling/vi-AA1dP3km

iii https://www.epi.org/publication/student-absenteeism-who-misses-school-and-how-missing-school-matters-for-performance/

iv https://eprints.lse.ac.uk/68655/1/Aucejo Assessing the effect of school days LSERO.pdf?gathStatIcon=true

v https://link.springer.com/article/10.1007/s00787-019-01327-3

vi https://dpi.wi.gov/wisedash/download-files/type?field wisedash upload type value=Habitual-truancy

vii https://dpi.wi.gov/spr

viii https://www.wicourts.gov/publications/statistics/circuit/statutereporting.htm

ix https://www.the74million.org/article/analysis-states-to-likely-see-a-doubling-of-pre-pandemic-chronic-absenteeism/

xi https://www.msn.com/en-us/news/other/youngest-kids-need-months-of-extra-school-to-close-covid-learning-gaps-study-says/ar-AA1dJzvV

xii https://dpi.wi.gov/sfs/aid/categorical/sparsity-aid-program#:~:text=Initially%20created%20under%20the%202007-09%20biennial%20budget%20%282007,school%20districts%20with%20relatively%20small%20economies%20of%20sc ale.

xiii https://files.eric.ed.gov/fulltext/EJ1196789.pdf

xiv https://www.sciencedirect.com/science/article/pii/S1438463918300713

xv https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7367090/

xvi https://will-law.org/wp-content/uploads/2021/10/SuspensionStudy.pdf