California Appellate Court Clarifies Knowledge Standard for School District Negligent Supervision Claims

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In a significant decision for school districts and institutional defendants, the California Court of Appeal, Fourth District, granted a writ of mandate reversing a trial court's denial of summary adjudication in *Rancho Cucamonga Central School District v. Superior Court of San Bernardino County (Rancho)*. No. E084855, 2025 WL 3471360, at *2, ___ Cal.Rptr.3d ___ (Cal. Ct. App. November 7, 2025) (published December 3, 2025). The ruling provides important guidance on the evidentiary threshold required to establish a school district's liability for abuse allegations premised on negligent supervision of personnel operating programs on school property.

Background

Kristopher Flowers, a former student of Rancho Cucamonga Central School District (the District), alleged that he was sexually abused by Christine Johnson, the director of an after-hours childcare program operated by the West End YMCA at one of the District's middle schools. *Id.* at *1. In his November 2022 complaint, Flowers asserted several causes of action against the District arising from the alleged abuse, including a negligent supervision claim based on the District's alleged failure to supervise Johnson. *Id.* The Superior Court of San Bernardino County denied the District's motion for summary judgment and motion for summary adjudication as to the negligent supervision claim. *Id.* Thereafter, the District petitioned the appellate court for a writ of mandate, which it granted. *Id.*

The Legal Standard: Actual or Constructive Knowledge

Under California law, a school district may be liable for negligent supervision when supervisory employees “knew or should have known of [a school employee's] dangerous propensities, but nevertheless hired, retained and failed to properly supervise” the individual. *Roe v. Hesperia Unified Sch. Dist.*, 85 Cal. App. 5th 13, 25 (2022), quoting *C.A. v. William S. Hart Union High School Dist.*, 53 Cal.4th 861, 875 (2012).

Critically, this requires a showing that supervisory employees had actual or constructive knowledge of the individual's dangerous propensities. *Roe*, 85 Cal. App. 5th at 26. California courts have defined constructive knowledge as that which “may be shown by circumstantial evidence which is nothing more than one or more inferences which may be said to arise reasonably from a series of proven facts.” *Id.* at 28–31 (finding school district had constructive knowledge of abuse by school janitor where two supervisory district employees witnessed students sitting on janitor's lap and janitor escorting students across campus to empty rooms in violation of school policy).

The Court's Analysis in *Rancho*

In *Rancho*, the appellate court found Flowers' evidence insufficient to create a triable issue of material fact. 2025 WL 3471360, at *2. While the alleged abuse occurred on school grounds, district employees did not witness any of the alleged sexual misconduct or any other actions by Johnson that raised concerns about her interactions with students. *Id.* at *1–2. Additionally, Flowers did not report the abuse to anyone at the District. *Id.* at *2. Thus, Flowers failed to demonstrate that the District had actual or constructive knowledge of Johnson's dangerous propensities. *Id.*

The court also addressed an important doctrinal distinction that had been conflated in the trial court proceedings. The

plaintiff attempted to apply the standard for negligent supervision of students—which requires only a showing that school personnel failed to exercise ordinary prudence—to claims alleging negligent supervision of employees—which requires a showing of actual or constructive knowledge. *See id.* at *3; *Roe*, 85 Cal. App. 5th at 29; *C.A.*, 53 Cal.4th at 869. The appellate court clarified that these separate causes of action have distinct elements and that the more demanding knowledge standard applies only to employee supervision claims. *Rancho*, 2025 WL 3471360, at *3.

Unresolved Issues Regarding Duty to Supervise Nonemployees

Notably, because the absence of actual or constructive knowledge was dispositive in *Rancho*, the appellate court expressly declined to address a threshold question that may prove significant in future cases: whether a school district owes a duty to supervise individuals who, like Johnson, are nonemployee third parties operating programs on district property. *Id.* at *2 n.1. This leaves an important issue unresolved as schools increasingly partner with outside organizations to provide on-campus programs. Until California courts directly address this question, institutional defendants should be mindful about the potential liability stemming from negligent supervision of nonemployees.

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