


**Expectations of the Board through 3.A  
Treatment of Students/Public**

To: Board of Education

From: Dr. Chris Fiedler, Superintendent of Schools

Re: Expectations of the Board – 3.A Treatment of Students/Public

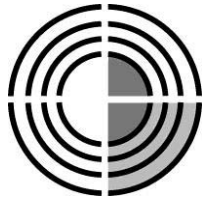
I hereby present the report on the Expectations of the Board in regard to Treatment of Students/Public, Executive Limitation 3.A, in accordance with the schedule as set forth in Board policy. I certify the information in this report is true.

Signed:   
Dr. Chris Fiedler  
Superintendent, School District 27J

Date: May 27, 2014



**SCHOOL DISTRICT 27J**  
**GOVERNING POLICY OF**  
**THE BOARD OF EDUCATION**



## **Policy III.A – TREATMENT OF STUDENTS/PUBLIC**

*Date Adopted/Last Revised: January 27, 2009 Management Limitations*

With respect to interactions with students and the public, the Superintendent will not cause or allow conditions or procedures that are unclear, unfair, unsafe, untimely, undignified or unnecessarily intrusive.

*I interpret “students” to mean: all children and young adults served by staff and programs of School District 27J, including preschool children, students enrolled in kindergarten through twelfth grade programs, young adults ages 18 to 21 served in special education programs, and students who are seeking enrollment in district programs. In addition, “students” includes former students who were enrolled at one time who are seeking re-entry into School District 27J, including students who have completed an expulsion.*

*I interpret "unclear" to mean: published information or interactions which do not result in clearly defined expectations, opportunities or intent.*

*I interpret "unfair" to mean: unjust, inequitable, prejudicial, or discriminatory.*

*I interpret "unsafe" to mean: dangerous or insecure.*

*I interpret "untimely" to mean: longer than necessary for required or requested actions to be carried out.*

*I interpret "undignified or unnecessarily intrusive" to mean: disrespectful or unwarranted.*

### **Data Reported:**

During the cycle of this report, one complaint was filed with the Office of the Superintendent of Schools and the General Counsel by parents/guardians asserting that their student has been denied equitable educational options and opportunities. This complaint has been resolved through the court system with School District 27J being successful in that the court upheld the district’s position that the student was provided with the required opportunities.

Also during this cycle of reporting, an Office of Civil Rights a random audit was conducted at Brighton High School. This audit was based on School District 27J’s relationship with community colleges through the Carl Perkins Grant. The audit had various findings that required staff at the building and district level to create a voluntary compliance plan related to policy, procedures and facilities. The following conditions were noted:

- Partial noncompliance in grievance procedures
- Incomplete communication of required information and coordinators of compliance
- Exceptions in policies and procedures

- Promotional materials in English only
- Incomplete assurances in work-based learning materials
- Accessibility findings

The complete “Letter of Findings” was shared with the Mr. Biner and Dr. Fiedler on April 4, 2014. It was also shared with the 27J Board of Education on April 21, 2014.

In a large organization like School District 27J, the interpersonal exchanges each day number in the millions. In School District 27J compliance is evident in the clear, consistent valuing and monitoring of a climate that is characterized by support and encouragement of high student achievement and the well-being of all students.

General Counsel provides technical assistance, policy development, monitoring of legal issues (e.g., special education, contractual, employment, open government, etc.), training and legal information for district staff to insure their ability to perform their duties in a legal and ethical manner thus ensuring compliance with this and related monitoring reports.

New employees are required to have background checks conducted by the Colorado Bureau of Investigation or the Colorado Department of Education. School volunteers are also required to receive a criminal background check, which is conducted through a paid service. All school buildings use a visitor screening and badging system, and controlled entry systems are being added this year to the ten elementary and two middle schools.

To support school safety and security, secondary school campuses have School Resource Officers (SROs) from the Brighton or Commerce City Police Departments, and high schools have 27J campus supervisors. Prairie View High School has one officer from both Commerce City and Brighton, although the staff was impacted this school year by an officer’s injury. One Brighton police middle school SRO serves both Vikan and Overland Trail Middle Schools. While there are no secondary schools in Thornton, the Thornton Police Department actively supports West Ridge and Brantner Elementaries. One example of this support includes conducting lockdown drills at those schools this year.

Students learn standard emergency protocols – Evacuate, Shelter, Lockout and Lockdown – during routine all-hazard drills conducted by every school. There is room for improvement at some schools to comply with drill requirements, and action steps will be taken to audit these during the upcoming school year. The audits will focus on two additional compliance areas, student and staff emergency training. School Safety Team members are required to complete incident command training in compliance with the School Safety Act, and currently 153 of 177 staff members have completed the module.

Students in Colorado can anonymously report all types of school safety concerns and threats through Safe2Tell. School District 27J actively promotes Safe2Tell to its students.

**Conclusion: I report compliance.**

**The Superintendent will not:**

1. **Elicit information for which there is no clear business necessity.**

*I interpret “no clear business necessity” to mean requesting student information without a clear and reasonably articulated need to know the information in order to provide educational services according to current best business (educational) practices.*

**Data Reported:**

Information about students elicited outside the regular enrollment procedures and instructional assessment needs are in compliance with superintendent policies governing education research (LC and LC-E Conduct Educational Research).

Superintendent Policy ILA-R Testing Programs strictly governs the administration of group achievement testing, but also includes language regarding the collection of survey information, specifically stating: *“Prior to the administration of any questionnaire, survey or examination which contains questions concerning parents’ or students’ beliefs or practices in sex, family life, morality or religion, written permission must be obtained from the parent or guardian of the student.”*

Between the beginning of the school year and the date of this report, one survey, Adams County Youth Initiative - Student Survey, was pre-approved and was in compliance with this executive limitation. After the administration of this approved survey, no complaints were received regarding the content.

**Conclusion: I report compliance.**

**2. Collect, review, transmit, store or destroy student information in a manner that fails to protect against improper access to that information.**

*I interpret “collect, review, transmit and store” to mean the gathering and maintenance of electronic data.*

*I interpret “destroy” as causing the inability to utilize the resource.*

*I interpret “student information” to mean: information as defined in COLO> REV. STAT. §§ 24-72-201 et seq. (Colorado Public Records Act).*

*I interpret “improper access” as access to a resource that is not approved or allowed.*

**Data Reported:**

State statute C.R.S. §§ 22-1-123 and C.R.S. §§ 24-72-201 *et seq.* (Colorado Public Records Act) and Superintendent Policies (JRA, JRA-E, JRA-R, JRC, JRC-E Student Records/Release of Information on Students) have provisions for collection and use of student information. Schools may disclose, without consent, directory information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance (*Source: The Legal Handbook for Colorado School Administrators.*) However, schools are required to inform eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA 20 U.S.C. § 1232g (Family Educational Rights and Privacy Act of 1974). The actual means of notification (special letter, inclusion in a PTA bulletin, student handbook, or newspaper article) is left to the discretion of each school. Evidence of compliance of notification occurred at the beginning of the current academic year, as the information

is contained in the student handbook that is available on the 27J website.

Student information is maintained in Infinite Campus (IC), the district's student information database. Access to IC is restricted according to the job description of each employee and is password protected. Access to IC by parents is limited to the records of their own student and is also password protected. Electronic information is backed up offsite to IC's secure data center, this redundant system is also an indicator of compliance with the asset protection monitoring report.

Confidentiality of student records is guaranteed under several federal laws, including Individuals with Disabilities Education Improvement Act (IDEIA) 20 U.S.C. §§ 1400-1487, FERPA (Family Educational Rights and Privacy Act) 20 U.S.C. § 1232g, and No Child Left Behind Public Law 107-110 (which guarantees confidentiality of a student's entitlement to receive free or reduced lunch).

School District 27J is a signatory to the state archive standards which govern the length of time records are kept and the procedures around destruction of records.

**Conclusion: I report compliance.**

**3. Operate without communicating to students and the public a clear understanding of what may be expected from District services offered.**

*I interpret "communicating" to mean informing by providing in a verifiable format.*

*I interpret "expected" to mean the intended outcome either of a product or of a behavior.*

**Data Reported:**

Standards of conduct and due process procedures are contained in the Code of Conduct which is posted on the District's website. Standard correspondence used in cases of referral for expulsion also contains due process advisements. Copies of these forms are consolidated in the District's shared electronic file storage.

Families of students receiving special education services are provided with a rights and responsibilities document that describes their rights under special education law.

The above are provided routinely in English and Spanish and can be produced in other languages upon request through the services of a translation bank.

The content of the student handbook also is available online through the 27J website, [www.sd27j.org](http://www.sd27j.org), under "Student Code of Conduct".

The policies and complaint procedures are explained in the student handbook in non-technical language.

The stated purpose of the student handbook is to clearly guarantee every student's right to lawful, fair and professional treatment as a school citizen in the 27J schools; to outline the responsibilities of each student in order to maintain a safe and positive atmosphere in which learning may take place, and to provide a document for reference on all student policies.

The handbook addresses topics including the most frequently utilized: admission; attendance and dismissal policies; student discipline, rights and responsibilities and due process; student health and immunizations; and other student policies. The handbook also contains the pupil nondiscrimination policy which applies to all areas of school operations, including all school-sponsored programs and activities.

Individual schools have the discretion to create informational handbooks in addition to the district student handbook. Both handbooks are based upon district policies and are incorporated into both into the policies of the district student handbook.

School District 27J has taken actions in order to increase communication with the community. The Public Information Officer position continues to report on individual schools and the District to promote the work of 27J. This includes the timely release of information from the District and schools by making them available online at [www.sd27j.org](http://www.sd27j.org), Facebook and Twitter. The Public Information Officer also focused on news releases to local and regional media at least weekly or more if necessary.

The School District 27J Annual Report is available online through the [www.sd27j.org](http://www.sd27j.org) website, in compliance with the Colorado Department of Education requirements. Letters were mailed to the residences of secondary students, and letters were sent home with elementary students. All schools were asked to forward requests for information to the Student Achievement Department. This spring there were no requests for a specific school or district information.

Information on the District Mission and Belief Statement are on the website in the “Superintendent” section.

Student Achievement data and information is located on the district website with information on the following topics: 27J Instructional Model, Federal Programs, Curriculum, Instruction, Assessment, and Gifted and Talented.

Other information on the website is provided to support students and parents. This information includes Special Education, Child Find, Preschool Programs, and transition services.

**Conclusion: I report compliance.**

- 4. Operate without informing students or the public, as appropriate, of this policy, and without providing a complaint response process to students and/or the public who believe they have not been accorded a reasonable interpretation of their protections under this policy.**

*I interpret “informing” to mean communicating by providing in a verifiable format.*

*I interpret “complaint response process” to mean a clearly communicated, published and articulated set of procedures which one can access to seek a resolution.*

*I interpret “protections” to mean those rights defined through state and federal legislation.*

**Data reported:**

The policies and complaint procedures are published annually in electronic format in the Student Handbook in English and Spanish and in Policy JII, Student Complaints and Grievances, and are accessible to all parents and students online in the Superintendent's Policies (These policies are listed below). The online student handbook provides summarized versions Superintendent's Policies with the option to link to the entire policy.

The procedures ensure that complaints are impartially and thoroughly investigated and that confidentiality is maintained to the extent possible.

Standard correspondence regarding due process notification in student expulsion matters has been centralized and is managed by the Director of Intervention Services.

The pupil nondiscrimination policy applies to all areas of school operations, including all school-sponsored programs and activities and is printed on page four of the student handbook. This policy clearly delineates the contact person within the organization who will investigate a complaint. As of the date of this monitoring report no reports of discrimination have been lodged.

The district website was constructed to allow maximum benefit to our external customers. The website can be translated into Japanese, Korean, French, German, Italian, Portuguese, Spanish, and Russian to meet the unique linguistic needs of our families. The flag icons at the bottom of the web page are the links to translation.

**Conclusion: I report compliance**