


**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

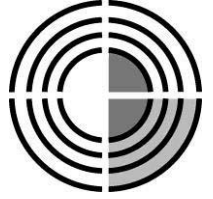
I hereby present the report on the Expectations of the Board in regard to Treatment of Students/Public, Executive Limitation 3.A, in accordance with the schedule as set forth in Board policy. I certify the information in this report is true.

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

Date: May 28, 2019



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.

The Superintendent will not:

- 1. Elicit information for which there is no clear business necessity.**
- 2. Collect, review, transmit, store or destroy student information in a manner that fails to protect against improper access to that information.**
- 3. Operate without communicating to students and the public a clear understanding of what may be expected from District services offered.**
- 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.**

Data Reported:

During the cycle of this report there have been a few complaints filed with the Colorado Department of Education.

1. Riverdale Ridge High School – allegation of failure to provide a Free and Appropriate Public Education (FAPE). District entered into mediation which was initially unsuccessful; however, the district and complainant continue to work through the issues and student is receiving necessary supports to be successful. Although discussions of strategy are ongoing, matter is considered closed.
2. PVMS – allegation of failure to provide FAPE based on failure to provide a manifestation hearing for student who had not yet qualified for special services. Allegation upheld and training has been conducted and will be reviewed in July 2019 with all administrators. Corrective Action Plan has been created around training and will be submitted to CDE. Matter should be closed by August 1, 2019.
3. Westridge Elementary – allegation of Title IX violation was received, but no formal complaint was filed. Investigation completed by Intervention Services and no wrong doing was found. Worked with parents of both students to come up with appropriate resolution. Matter is considered closed.
4. Brighton High School – allegation of IDEA violation and Title IX violation. IDEA matter resulted in a complaint being filed with CDE. Title IX matter has resulted in a Federal Lawsuit being filed. Due to ongoing nature of both situations, no further details will be given at this time.
5. Eagle Ridge Academy – student has been expelled due to charges of sexual assault being filed. Student is a special needs student and allegations of failure to provide FAPE have been filed with CDE. Both ERA and 27J are in process of responding to this matter. As it is ongoing, no further details will be provided at this time.

Safety and security are key considerations in the treatment of students and the public. Training programs, policies and procedures, and physical safety and security measures implemented in 27J help protect anyone at our sites. New and remodeled schools have received enhanced security systems, and existing schools continue with improvements through bond funding.

New employees are required to have background checks conducted by the Colorado Bureau of Investigation as managed by the Colorado Department of Education. Daytime school volunteers are screened with Raptor Technologies, and after hour volunteers are screened online by HR via a commercial criminal background check. Procedures are in place to verify that contractors have appropriate background checks and proper identification while working at district sites.

Access control at all school buildings includes use of a visitor screening and badging system. All schools (Except PVHS which will be added with the atrium addition to the front of the school) have controlled entry systems operated during school hours that allow staff to view and talk to entrants before allowing access into the building during school hours. Prairie View HS and Brighton HS now have a security kiosk in the main lobby.

School Resource Officers (SROs) from local police departments are assigned to district secondary schools and play an important role in safety and security. The district has officers from the Commerce City, Thornton and Brighton Police Departments. The Commerce City Police Department provides one SRO at Stuart MS and the Thornton Police Department provides one SRO at Riverdale Ridge HS/Rodger Quist MS. The Brighton Police Department provides officers at Brighton HS, Brighton Heritage Academy Campus, Prairie View HS, Overland Trail MS, Vikan MS, and Prairie View MS. The district has formally requested SRO coverage for Rodger Quist Middle School when that program moves into the new building in Jan. 2020. SRO costs are shared between the district and the cities.

While the original goals of the SRO programs were related to proactive work through community policing, SRO's and district staff regularly meet to provide assistance and response to a variety of critical incidents or emergencies. Quarterly safety and security meetings take place between Emergency Response Specialist and Law Enforcement agencies to build a greater capacity to promote safe schools across the district. Working alongside law enforcement agencies all schools now have law enforcement lock boxes for emergency access into each school during a critical incident. Each lock box at every school site contains critical information pertaining to that school in the event of an emergency.

Campus supervisors are 27J employees who work as security monitors in safety and security. These employees provide additional monitoring and security presence at the schools to promote additional safety and security. Prairie View HS has five campus supervisor, Brighton HS has three, Riverdale Ridge HS has two, and Prairie View MS and Stuart MS each have one.

There are many training programs that address school safety and security. Students learn four actions of a standard response protocols (SRP) – Evacuate, Shelter, Lockout and Lockdown – during routine all-hazard drills conducted by every school. Training on these protocols is also included in annual site-specific presentations provided to the schools for staff training. School Safety Team members are required to complete incident command training for schools (online FEMA module) in compliance with the School Safety Act. There are also required after action meetings and reports for every initiated SRP.

During this school year, additional training programs provided to schools included Evacuation Assistance, campus supervisor training, summer custodian training and Psychological First Aid. The 27J All School Drill in October had schools practice several scenarios for evacuation assistance, use of the evacuation chairs in two-story schools and HAZMAT Shelter in place. Agency observers are at most locations for the drill, and schools invite parents and guardians to observe the All School Drills.

The 27J interoperable radio system utilizing SchoolSafe technology is operational at all campuses, including Riverdale Ridge High School. Charter schools; Eagle Ridge Academy, Belle Creek Charter School and Bromley East Charter School have accepted the district's offer to provide the technology to charter campuses. In addition to these charter schools, Landmark Academy and Foundations Academy are on board to join the interoperable radio system in 2019-2020 school year. Adcom 911 and the Thornton Communications Center can bridge school radios to public safety, although this has not been utilized during an incident to date. District wide radio bridging is tested each month to ensure the functionality and purpose of true interoperability amongst several agencies.

The district has received additional funding from the 2019 School Security Disbursement Grant. The \$350,000 grant funds will be utilized to provide all schools with more communication radios and training. The grant funds will also be used to enhance communication inside schools, between schools and across the district for added security and safety.

Schools continue to promote Safe2Tell with students, which provides safe, anonymous reporting for all types of school safety concerns and threats. School staff and parents and guardians have also utilized the system. Tips are promptly dispatched by Safe2Tell, via text messaging and email, to police and school administration to address. Police departments continue to do an excellent job of responding overnight to urgent tips, such as suicide or security threats, to provide immediate intervention.

Administrators and mental health support staff are trained in the Adams County Threat Assessment Protocol. Every building has specific staff trained in threat assessment as well as in the ASIST suicide intervention model. In February 2019, 27J Schools was awarded a Suicide Prevention and Intervention Grant, from the Colorado Department of Public Health and Safety for the next three years with the purpose to serve in increasing the number of school and district staff trained in comprehensive suicide prevention and crisis response, increase the number of staff and students reporting a positive school environment and climate, and increase the number comprehensive suicide prevention polices being implemented at the school and district level.

Below is a summary of data collected. It also represents the continued work that 27J does to collaborate with various partners to protect and ensure student safety.

27J also regularly tunes into student, parent, and teacher perception data around student safety, and all sources of data are used to guide school UIP planning each summer. UIP training on School Culture and Climate held in December 2018 based on the data from the Adams County Student Survey. All 27J schools are expected to have an academic achievement goal as well as a climate and culture goal.

Sources of Strength was implemented at PVHS and BHS beginning in Fall 2018. Sources of Strength is a universal suicide prevention program, is designed to build protective influences and reduce the likelihood that vulnerable youth will become suicidal. The program trains students as peer leaders and connects them with adult advisors at school and in the community. Advisors support the peer leaders in conducting well-defined messaging activities that aim to change peer group norms influencing coping practices and problem behaviors (e.g., self-harm, drug use, unhealthy sexual practices). The program is strength-based and promotes eight critical protective factors that are linked to overall psychological wellness and reduced suicide risk. Specifically, program activities aim to reduce the acceptability of suicide as a response to distress, increase the acceptability of seeking help, improve communication between youth and adults, and develop healthy coping attitudes among youth. The program is also designed to positively modify the knowledge, attitudes, and behaviors of the peer leaders themselves. Further expansion of the programming in 2019 is scheduled.

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.”*

Three requests to conduct research in 27J were approved during the 2018/2019 school year.

1. Dana Linnell Wanzer, Researcher for Be Strong, and Dr. Laura Saurini, Counselor at Turnberry Elementary, conducting "An Evaluation of the Be Strong Resilience Program". The purpose of this study is to teach students and teachers about social aggression and bullying, strategies to reduce social aggression and bullying, and methods for promoting internal resilience. Students participated in a pre/post survey before and after the Be Strong Resilience program as well as a post-test teacher survey regarding fidelity of implementation. Parents were provided information about the study. Parents provided consent for their child to participate in the study. All student, class, and school information was anonymous through the study.
2. Cassie Green, Doctoral Student at University of Colorado Denver, conducting an "examination of teacher perceptions of how they are currently implementing culturally relevant teaching practices, as well as what the improved, optimal, or ideal culturally relevant teaching practices might look like in their classrooms". This research used focus group interviews of 8 volunteer teacher participants. The request didn't make requests of individual student data.
3. Della Palacios, Doctoral Student at University of Colorado Denver, conducting a quality improvement partner study "Redesigning Professional Development from a Strengths-based Perspective". Participants in this study would have included staff only. This quality improvement project was not completed in 27J as the researcher partnered with a different district upon her resignation of her position in 27J. There was no request of individual student data.

The Superintendent will not:

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 2016-17 school year, as the information is contained in the Rights and Responsibilities of Students and Parents 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, most notably the 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.

There are other systems, beyond IC, that are used to house student data – here is link to a document on the 27J website about [Third-Party Providers](#). Access to these systems are password protected. Most of these systems do not have a parent portal. When parent access is available, it is limited to the records of their own student and is also password protected. Access to these on-demand providers is restricted according to the job description of each employee and is password protected.

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.

The Superintendent will not:

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 student conduct and due process procedures are contained in the Student Code of Conduct and Handbook, which is posted on the District’s website. School administrators are trained in due process procedures and documentation, and have access to written reference and guidance materials electronically, as well as through direct conversations with district legal and administrative staff.

Families of students receiving special education services are provided with an additional rights and responsibilities document that specifically 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, under “Student Code of Conduct and Handbook”. Much of the information provided is in summary form with quick links to entire policies or related guide documents for those wanting additional information about a specific topic.

Due process policies and complaint procedures are explained in the Student Code of Conduct and Handbook with attention to using easy-to-understand, non-technical language as much as possible.

The stated purpose of the Student Code of Conduct and 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, 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 Student Code of Conduct and Handbook. However, the need for consistency of message and practice is stressed to schools to avoid misinformation or misunderstanding. Handbooks are based upon district policies and are incorporated into both the policies of the Student Code of Conduct and Handbook. Information on the District Mission and Belief Statement are on the website in the "About Us" "About Our District" section.

Student Achievement and data can be found on the CDE School View website at <https://www.cde.state.co.us/code/districtdashboard>. This website provides information on

demographic, achievement, growth, post-secondary, and accountability data. The link to this website can be found on the 27J Schools website under Student Learning tab.

Other programming and student achievement information will become available on its own channel on the district website. These areas of information are: Assessments; College and Career Readiness; Counseling; Career and Technical Education; English Language Acquisition; Federal Grants; Gifted and Talented Education; Health Services; Instructional Technology; Intervention Services; Preschool; Professional Learning; Special Education; Student Health and Wellness; Student Learning. Each of the areas within Student Achievement are/will be formatted around the Vision of 2039: *Empowering ALL students today to take control of their future tomorrow*. Each area will also display the district Mission statement as well as introduction and overall guiding statements relevant to each area. All Student Achievement areas will have multiple connections of finding supportive information for staff, students, and families. There will also be numerous connections and cross-referencing within each area to provide user-friendliness in navigating the websites.

The School District 27J Communications Department continues to evolve in its communication efforts. The Public Information Officer continues to provide timely information to parents and makes this information available online at www.sd27j.org, Facebook, and Twitter. The Public Information Officer plays a key role in crisis communications between schools and families, and works with local, regional, and even national media with news releases.

The Superintendent will not:

- 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. 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. This year an addition has been made to the policies that assure clarity of the appeal process for discipline, in Policy JKD.

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 other than those articulated on page 3 of this monitoring report have been lodged.

The district website was constructed to allow maximum benefit to our external customers. The website can be translated into nearly every language and meets the unique linguistic and visual needs of our families. The flag icons at the top of the web page are the links to support these needs.

Conclusion: I report compliance