Washington Central Unified Union School District

WCUUSD exists to nurture and inspire in all students the passion, creativity and power to contribute to their local and global communities.

1130 Gallison Hill Road
Montpelier, VT 05602
Phone (802) 229-0553
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WCUUSD
Policy Committee Agenda
September 3, 2025
4:45-6:00 PM
U-32
930 Gallison Hill Rd.
Montpelier, VT
(Virtual/In-Person)

Virtual Meeting Information
https://tinyurl.com/48ja9wnr
Meeting ID: 829 9218 0624
Password: 778549
Dial by Your Location: 1-929-205-6099

1. Call to Order

2. Approve Minutes of 6.11.25 – pg. 2

3. Review and Affirm Policy Workplan - pg. 5

4. Policies for Review (Discussion/Action)
   4.1. (Review and Recommend to the Board the Adoption) AOE Model Policy: Behavioral Threat Assessment Teams and Model Procedures – pg. 9
   4.2. (Recommend to maintain current policy) D4: Title I Comparability (Procedure) – pg. 31
   4.3. (Determine Next Steps) C47: Student Exchanges (neither VSBA required or recommended) – pg. 34
   4.4. (Determine Next Steps) C34: Use of Restraint and Seclusion; VSBA Model Policy C70: Use of Restraint and Seclusion – pg. 36
   4.5. (Determine Next Steps) F46: Flag Raising (request from students to modify to every 3 years for a renewal request) – pg. 43

5. Future Agenda Items
   5.1. Next Meeting: October 8, 2025

6. Adjourn

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WCUUSD
Policy Committee
June 11, 2025
4:30-5:45 PM
(Virtual)

Present: Superintendent Dellinger-Pate, Ursula Stanley, Chris McVeigh, Natasha Eckart

1. **Call to Order: Chris McVeigh called the meeting to order at 4:34.**

2. **Approve Minutes of 5.7.25: Natasha Eckart moved to approve the minutes of May 7, 2025. Seconded by Ursula Stanley, this motion carried unanimously.**

3. **Policy Work Plan:** The committee reviewed the work plan. Chris McVeigh asked for any updates on the plan to bring together a committee to work on health/wellness-related policy/ policies. Superintendent Dellinger-Pate stated that this committee has not been formed to begin its work yet. Chris McVeigh suggested an update on the agenda for a future meeting
   3.1. Procedures Update

4. **Policies for Review**
   4.1. AI Policy Draft: Members of the team that drafted this will attend a future committee meeting. Superintendent Dellinger-Pate had shared a draft for an AI (Artificial Intelligence) policy. He asked members of the committee whether there is any initial feedback or questions that he could bring back to those who helped to draft this. He stated that re: "ethical use," he does not want to get involved in "banning," but would like to guide students to use the tool ethically, as part of broader digital citizenship. Natasha Eckart asked whether there is any language in the policy referencing deliberate education for students around the use of AI. Superintendent Dellinger-Pate indicated that nothing formal has been developed yet; this has been something that is brought to students as needed. Natasha Eckart stated that it seems wise to create something more concrete around providing explicit education to students re: use of AI.Ursula Stanley stated that there are many aspects and uses of AI. Committee members agreed that this is a "deep well". Natasha Eckart noted that this might be more process than procedure - and is most of this covered in our plagiarism policy? The question will be are we teaching and using AI appropriately? Chris

McVeigh stated that the goal is to teach students to have skills needed for information seeking, with or without AI. Stephen Dellinger-Pate indicated that this is an evolving technology and he would like to avoid creating a policy that is so restrictive that it ties the hands of teachers in their jobs of teaching such tools. He stated that he would like to focus on professional development for teachers. How do we want to embrace technology but at the same time, limit it to educational uses? Not to leave it to individual teachers - create a process and a curriculum of sorts. Stephen Dellinger-Pate suggested the questions to take back to those who have worked on the draft of this policy:

- What does related professional development look like?
- How do we envision integrating this into current curriculum and instruction?
- How do we envision teaching kids about AI? (In addition, make sure that the policy supports these answers.)

Natasha Eckart stated that the NEA had offered much training in this past year, webinars, etc., around AI. Chris McVeigh asked, How do we educate students about what our expectations regarding the use of AI? (He expressed concerns about using AI to do their work.) How to use AI to enhance your work versus DO your work? Natasha Eckart wondered if this conversation, at this depth, about AI, was within our purview as the Policy Committee? Ursula Stanley stated that in our goal to develop learners who are able to go into the world as critical thinkers, we need policy and procedure around AI, and then the board implements it . We will need to be able to flex with AI. Chris McVeigh stated that there could come a point when procedure overwhelms the policy. Some discussion followed around how much value there is in creating a policy, which is, generally, create and review procedure regularly. Natasha Eckart suggested that we look at some of the other policies that would apply to this (e.g., the responsible digital citizenship policy), and apply to the concept of AI so that we are consistent. Chris McVeigh asked, is this more of a procedure, that we are considering today? Natasha and Ursula wondered - Can we combine two policies or does AI need its own policy and is there a way to start with the one that is already in place (re digital citizenship) to create an AI specific policy? Discussion followed around academic integrity and "misrepresentation" - e.g. if a student asks another student to write their paper…. this idea is already addressed within other policies/ procedures. How to encompass AI? Provide a guideline regarding expectation for students, specifics around enforcement - these are addressed in other policies - how to roll AI into this? Committee members would like to compare the policy in existence (re: responsible use of technology) to further this discussion around AI, based on the draft policy that was provided today. Ursula Stanley asked whether VSBA is already working on an AI policy. Natasha Eckart will check whether NEA has created a model policy around AI. She will share this with the Policy Committee in advance of the next meeting.

4.2. Student Discipline Policy: (C15 VSBA Student Conduct and Discipline; C20 WCUUSD Student: Conduct and Discipline) Draft of Combined Policy: Superintendent Dellinger-Pate had mocked up this policy draft for the committee's consideration. Superintendent Dellinger-Pate shared that some of the changes that had been made from C20 are aligned with law (e.g. related to definition of expulsion versus suspension). Ursula Stanley asked whether item #6 from C20 is covered in the proposed updated C15. Chris McVeigh stated that it would be important to explicitly reference how to access due process rights, and where the "plan" can be accessed. Superintendent Dellinger-Pate will make changes to the draft based on tonight's discussion, for the committee to consider at the next meeting.

4.3. Act 150 Policy Requirement Review: Sec. 7a of this act establishes a requirement for each school board and each approved independent school to develop, adopt, and ensure

enforcement of a library material selection policy and procedures for the reconsideration and retention of materials that affirms the importance of intellectual freedom, guided by the First Amendment, the Civil Rights Act of 1964, Vermont laws prohibiting discrimination in places of public accommodation, the American Library Association's Freedom to Read Statement, Vermont's Freedom to Read Statement, and that reflect Vermont's diverse people and history, including diversity of race, ethnicity, sex, gender identity, sexual orientation, disability status, religion, and political beliefs. (Current WCUUSD Policy: D22 Library Media Center Selection and Reconsideration, VSBA Required Policy: D8 Selection of Library Materials) Superintendent Dellinger-Pate stated that our policy (currently D22) is comprehensive. Do we expand this to include curricular materials (as well as library materials)? Or do we create a separate policy? Natasha Eckart stated that the VT NEA is working on creating a policy specific to this (curriculum content in the classroom); the draft uses the current selection of library materials policy as a starting point. It will be shared with VSBA; she can share the outcome with this committee for further work on this. Chris McVeigh would like to include language from the Vermont Constitution as well. Superintendent Dellinger-Pate would like to more carefully review the policy to see what details are more appropriate for a procedures document versus a policy document.

4.4. EV Policy: Chris McVeigh shared that this draft comes from various EV policies that are circulating; he would like to use this as a starting point for creating policy. Stephen Dellinger-Pate shared that we currently have an EV charging station only at Rumney. We are working on installing at U-32. He suggested that we not indicate a specific company within the language of a policy. Some discussion followed around rates for the use of EV charging stations. E.g., would the policy indicate that the Finance Committee designates rates? Or superintendent? Etc. Superintendent Dellinger-Pate stated that he would bring this information/ draft to students tomorrow when he meets with them; so that they can consider and provide input.

5. Future Agenda Items

5.1. Next Meeting: The committee will meet again in September. (1st Wednesday in September: September 3rd)

6. Adjourn: The committee adjourned by consensus at 5:44 p.m.

Respectfully submitted,
Lisa Grace, Committee Recording Secretary

BOARD POLICY DEVELOPMENT & MAINTENANCE PROCEDURES

> The development and maintenance of school district policies is the central job of school boards. The Vermont statute entitled "Powers of School Boards" lists over twenty-five specific duties delegated to local boards by the General Assembly. The very first responsibility on the list is the duty to "Determine the educational policies of the school district…" *(VT School Boards Association Resource Directory, 2022)*

One of the standing committees of the Boards of WCUUSD is the Policy Committee. The board selects representatives to the Committee. In addition, three administrators (two local building administrators and one central office administrator) are on the committee. The committee meets once per month to review policies and each year a work plan is established outlining which policies will be reviewed or developed during the school year. Policies are identified for review or development three ways:

1. Mandatory review/development (State and federal law may require the adoption of new policies or revision of existing board policies and often have a deadline for doing so.)

2. Selected review/development (Board or Policy Committee requests a review ahead of the regular review cycle or identifies a need for a new policy that does not yet exist. The Policy Committee establishes a process for considering requests for policy review that come from the public.)

3. As part of the policy review cycle (Our goal is that all policies are reviewed no less than every five years and policies are reviewed in sequential order.)

As stated in the VSBA reference above, policy is different than procedures. Except when required by law, the Policy Committee generally does not include procedures in policy. Policy implementation and procedure development is the role of the administration. Sometimes guidelines are added to policy to provide guidance to the administration as it develops procedures and implements policy.

All board policies, by state law, must be warned before the board can adopt a new policy, revise and/or repeal an existing policy. This process helps all of the boards to efficiently address their policy governance role. We are continually making improvements to the system.

Month	**Goal #1: Educational and Academic Outcomes** **Goal #2: Broadening Communication with the Community** **Goal #3: Long Term Planning**		
	Mandatory Review/ Development	**Selected Review/Development**	**Policy Review Cycle** *(sequential order by adoption date - beginning from 2019)*
August			
September 3	Work Plan development		
	Act 29: Behavioral Threat Assessment D4: Title I Comparability C47: Student Exchanges C34: Use of Restraint & Seclusion (VSBA updated model policy to C70 in 2022) F46: Flag Raising (request from students to modify to every 3 years for a renewal request)		
October 1	Affirm work plan		
	C20: Student Conduct and Discipline (discussed in 22-23 & committee request admin feedback; VSBA updated in 2022 to C15) C8 Pupil Privacy (Revised 11/4/24 VSBA) C45: Bus discipline		
November 5	AI (Artificial Intelligence) Policy B32: Educator Supervision and Evaluation Animals in Schools Policy C50: Comprehensive Sexual Health Services		

December 3	C9 Nutrition & Wellness (AOE has issued a new model policy and replaces the VSBA policy) Triennial Policy Review		
January 7	D1: Proficiency-Based Graduation Requirements C22: Student Athletics, clubs and activities		
February 4	D2: Grade Advancement: Retention, Promotion and Acceleration of Students E46: Memorials		
April 1	C48: Foreign Exchange Students		
May 6			
June 3			

Policies to determine next steps

EV Charger Policy
Animals in Schools
VSBA Recommended Policies

- C22 Student Athletics, Clubs and Activities
- C25 Admission of Non-Resident Tuition Students
- D20 Curriculum Development
- D21 Education Support Systems
- D23 Selection of Instructional Materials
- E21 Distribution of non-school sponsored literature in schools
- F23 Capitalization of assets
- F27 Communicable Disease Mitigation for Students and Staff

B2, B3, B4, B5, B7
C1, C2, C4, C5, C7, C11, C13, C14
D3, D5, D6
E1

F1

Policies Approved/Revised 24-25
D24 Creating Learning Environments to Engage in Civil Discourse
F20: Fiscal Management & General Fiscal Accountability (VSBA Recommended policy)
F45: Fundraising
B41: Prevention of Conflict of Interest in Procurement
B30 Staffing and Job Descriptions
Rescinded: C30 Student Medication; **Replaced by** C71 Possession and Administration of Emergency and Non-emergency Medications
C51: Policy of Ensure Safety & Resources for Families Impacted by Immigration Enforcement
A31: Board Member Education
A32: Board Goal Setting & Evaluation
A34: Board Relations with School Personnel
A24: Board Supervision Relationship

Policies Approved/Revised 23-24
F3 Fire and Emergency Preparedness (8.23.23)
F4 Access Control and Visitor Management (8.23.23)
B20 Personnel Recruitment, Selection, Appointment and Background Checks (January)
C6 Home Study Students (November)
C3 Transportation (November)
D22 Instructional & Library Materials Selection (January)
A2 Policies and Procedures (January)
A20 Board Meetings, Agenda Preparation and Distribution (January)
A22 Notice of Non- Discrimination (January)
F26 Security Cameras (January)

Policies Discussed by the Committee - No Actions
School Choice - Board opted not to create a policy
D4-Discussed in February by committee, agreed to send to full board , has not been reviewed by the full board due to budget

Mandatory Review/Newly Revised
E21 Distribution of Non-School Sponsored Literature in Schools (6/5/24 by VSBA) WCUUSD Does not currently have a policy E21

Policies Removed by VSBA that we have
B31 Educator Supervision and Evaluation (1/12/24)
B30 Staffing and Job Descriptions (10/2/23)

Issue Date: May 23, 2025

School Behavioral Threat Assessment Model Procedures

Section 1: Background and Purpose

Behavioral Threat Assessment (BTA) is recognized as the best available tool to prevent targeted violence in schools, higher education institutions, workplaces, and communities. Vermont education law[1] requires that Vermont supervisory districts, supervisory unions, public and independent schools establish BTA teams[2] and utilize BTA procedures to prevent targeted violence and mitigate troubling, unsafe behaviors. This document provides BTA teams with detailed model procedures for engaging in a behavioral threat assessment in a K-12 setting. The threat assessment program shall operate in a manner that avoids bias, discrimination, and disproportionate impact on students due to the presence of particular traits.

These BTA model procedures should be used by Vermont School BTA teams in concert with training on BTA best practices and procedures. BTA teams should also consult the BTA Team Model Policy (or their local district or school's adopted BTA policy) and the BTA Best Practices Guide for additional details on BTA procedures and other aspects of developing and operating a BTA team and program. These BTA model procedures are not a replacement for school/district student conduct or disciplinary policies.

Information on how to access additional technical support can be found on the Behavioral Threat Assessment (BTA) in Schools | Agency of Education website.

Threat Assessment Models

The BTA model procedures detailed in this document follow the "NTAC Model" of school behavioral threat assessment, an empirically based model first issued by the U.S. Department of Education and U.S. Secret Service in 2004[3] and later reissued by

[1] 16 V.S.A. § 1485

[2] For districts or independent schools that have not yet established a BTA team, please refer to the BTA Model Policy for guidance on how to create a BTA team that complies with Vermont law. Additional information on creating and operating BTA teams is available in the BTA Best Practices Guide

[3] Fein, R., Vossekuil, B., Pollack, W., Borum, R., Modzeleski, W., and M. Reddy (2004). Threat Assessment in Schools: A Guide to Managing Threatening Situations and Creating Safe School Climates. Washington, D.C.: U.S. Seret Service and U.S. Department of Education.

the U.S. Secret Service National Threat Assessment Center (NTAC) in 2018[4]. These BTA model procedures also closely match the BTA procedures covered in training provided by the Vermont School Safety Center between 2022 and 2024. BTA teams in Vermont are not required to use the NTAC BTA model procedures and can elect to use another reputable school BTA model instead. Other reputable models include the CSTAG model[5] and the Salem-Keizer-Cascade model.

Overview of BTA Model Procedures

The behavioral threat assessment process is essentially a fact-finding process. It involves responding to threats of violence or other alarming behavior by finding out more about the person who has threatened, trying to determine if the person is planning or preparing for violence, and if so, trying to understand why – what is driving that behavior? People who engage in violence often do so when they are at a point of personal crisis or desperation.

The School BTA model procedures are designed to help Vermont BTA teams learn more about a student[6] who has engaged in threatening or troubling behavior, determine if they are in crisis or resorting to violence, and find ways to intervene to reduce that person's crisis or desperation.

Below is an overview of the steps in the BTA procedures detailed herein:

1. Intake and review of the initial report and immediately available information
2. Screen the case:
    a. Determine if the situation is imminent or an emergency
    b. Determine if a behavioral threat assessment is needed. (If it is not needed, skip to Step 8)
3. Gather additional information from multiple sources
4. Organize and analyze the available information
5. Make the assessment
6. Develop and implement an intervention and safety plan

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[4] National Threat Assessment Center (2018). Enhancing School Safety Using a Threat Assessment Model: An Operational Guide for Preventing Targeted School Violence. Washington, D.C.: U.S. Department of Homeland Security.

[5] Cornell, D. (2024). Comprehensive School Threat Assessment Guidelines: Intervention and Support to Prevent Violence, 2d Edition.

[6] NOTE: These BTA procedures focus on assessment of students who have engaged in threatening or alarming behavior. However, these same procedures can also be used to address threatening behavior from non-students as well.

7. Monitor the plan and update the assessment and interventions
8. Close and document the case using local procedures.

Threat Assessment Team(s)

BTA Teams can be established at the district or school level and may include regional or local community partners. An individual is not required to be an employee of the [district/school] to serve on a threat assessment team. For more information about establishing a BTA team, see the School BTA Best Practices Guide available on the Behavioral Threat Assessment (BTA) in Schools | Agency of Education website.

The [superintendent/head of school] shall designate one member of the threat assessment team to serve as the standing coordinator and leader of the team.

The [superintendent/head of school] shall establish and ensure the annual training of a multidisciplinary threat assessment team members to serve [district schools/ the school].

Not every multidisciplinary team member needs to participate in every threat assessment.

Sample [District/School] BTA Team Member Contact List:

District/School BTA Contact Information:

Dr. Jane Doe, Superintendent

Designated BTA Team Coordinator

(802) 888-8888/ jane.doe@schools.com

Jack Frost, District Clinician

Core Team Member

(802) 888-9999/ jack.frost@schools.com

George Farmer, ABC Elementary School Principal

ABC Elementary School Team Member

(802) 888-1010/ george.farmer@schools.com

Local Law Enforcement (non-emergency):

XYZ City Dispatch

(802) 802-XXXX

Community and Local Resources:

County Mental Health Services

(802) 802-XXXX

When faced with a potential threat by, or directed towards, a student who is eligible for special education or is a qualified student with a disability under Section 504 of the Rehabilitation Act of 1973, the threat assessment team must include a team member who is a special education teacher or through consultation with an expert with this knowledge.

Although parents, guardians, or family members are often interviewed as part of the threat assessment process, neither the student nor the student's family members are part of the threat assessment team. This does not diminish the [district's/school's] commitment that school personnel will make every reasonable attempt to involve parents and the student in the resolution of the student's behavioral violations, consistent with [district/school] discipline policies.

Depending on the level of concern determined, the threat assessment team develops and implements intervention strategies to manage the student's behavior in ways that promote a safe, supportive teaching and learning environment, without excluding the student from the school.

Engagement with Law Enforcement

Law enforcement must be contacted immediately in case of imminent danger to individuals or the school community.

In the event of student behavior that is a violation of the school conduct code but that is not also a crime or indicative of severe or imminent threat to safety, the [superintendent/head of school] may authorize the BTA team to engage with local law enforcement consult to support the assessment of the BTA team. The role of law enforcement personnel is to respond to emergencies, investigate the credibility of a threat, investigate or respond to criminal activity, and provide consultative support to school BTA Teams as appropriate.

Not all BTA cases require law enforcement involvement or consult. Should law enforcement engage in an investigation based on the reported behaviors, the school BTA process should continue in collaboration with local law enforcement and in accordance with existing education laws and due process procedures.

Section 2: Step-by-Step Procedures

When a threat of violence or other troubling behavior is reported, take the following actions:

Step 1: Intake and Review Initial Report and Available Information

Capture basic intake information such as:

- Name of the student who made the threat or engaged in other troubling behavior (the “Student of Concern” or “SOC”)
- Other persons involved
- Who reported the information (“Reporting Party”)
- Description of what happened, when, where, etc.

AND

Review any other readily available information, such as:

- Known history of threats or violence
- Recent social media posts (if viewable)
- Known access to firearms or other lethal weapons
- Special education records or disability status for the SOC
- Harassment, hazing, and bullying records for the SOC

NOTE: If the Student of Concern has an IEP, 504, BIP, etc., or is suspected of a disability, alert the Special Education teacher / case manager and ask that they work with the BTA team for the duration of this case.

Step 2: Screen the Case

After reviewing the intake information and initial report, screen the case to determine if it is an emergency / imminent safety concern and to determine if a behavioral threat assessment is needed. The BTA team should answer the following screening questions:

Screening Question 1:

Based on currently available information, does the situation appear to be an emergency or significant safety concern that requires swift protective actions (i.e., lockdown, immediate engagement of law enforcement due to a weapon on campus)?

- **YES**
  - Immediately contact law enforcement
  - Initiate emergency operations procedures
  - Contact AOE and DPS through the Critical Incident Report
  - When safe to do so, run a behavioral threat assessment.
- **NO**
  - Move on to Screening Question 2

Screening Question 2:

2a. Does the Student of Concern have a current 504 plan, IEP, or other behavior plan or is suspected of having a disability?

- **NO**
  - Move on Question 3.
- **YES**
  - Contact the Special Education teacher or case manager and engage them in the screening process. Proceed to 2b.

2b. Has the Student of Concern's (SOC) IEP/504 been fully implemented, including all accommodations/services required?

- If **YES**, continue to 2c.
- If **NO**, could the behavior of concern be attributed to a failure to implement the IEP/504?
  - If yes, a Manifestation Determination Review is required.
  - If No, proceed to 2c.

2c. Considering the Student of Concern's disability and baseline behavior, is their threatening or alarming behavior part of their baseline behavior **and/or** can it be adequately addressed by the SOC's 504 plan / IEP or an FBA / BIP etc.?

- ☐ If **YES**, there is no need for a behavioral threat assessment.
  - Consult with the Student of Concern's case manage/504 Coordinator to discuss management.
  - Skip the rest of the BTA procedures and proceed directly to document and close the case.

- ☐ If **NO**, continue to screening question 3 (special education professional / case manager is to remain as a member of the BTA team for this case).

Note: *Should administration seek to change the placement of a student with a disability due to an infraction in the student code (i.e., suspension, home-bound school, etc.), a manifestation determination review is needed. This should NOT halt or delay the BTA team in following the BTA procedures but instead can be done as a parallel / concurrent review.*

Screening Question 3:

If the Student of Concern (SOC) has shown any of the following behaviors, a behavioral threat assessment is needed. Please check all that apply:

- ☐ Student of Concern made a threat of violence to others (or to self and others)
  - ➢ **If yes**, a behavioral threat assessment is needed.
- ☐ Student of Concern has engaged in other communications or behavior that raise concern about potential violence to others (or to self and others)
  - ➢ **If yes**, a behavioral threat assessment is needed.
- ☐ A person is significantly fearful of the Student of Concern and taking action to protect themselves
  - ➢ If **yes**, a behavioral threat assessment is needed.

Based on your answers to the screening question, should the team run a behavioral threat assessment?

- ☐ **NO - If the BTA team answers NO to ALL sections of Screening Question 3, the BTA team should:**

- Document the initial intake information and answers to screening questions.
- The documentation must support there was no intent to harm and how the situation was addressed/resolved.
- Skip the rest of the steps and proceed directly to closing the case.

☐ **YES - If the BTA team answers YES to ANY of the sections of Screening Question 3, the BTA team should:**

- Continue the remainder of the BTA process by moving to the next step (Gather Additional Information).

Step 3: Gather Additional Information from Multiple Sources

After determining that a behavioral threat assessment is needed, gather additional information from multiple sources about the Student of Concern and their situation. This step is also known as "*collecting the dots*."[7] Examples of information to gather include:

- Prior behavioral threat assessments (Was the Student of Concern screened or assessed previously and how long ago?)
- Current (and historical) academic performance
- Observations from current teachers, school counselors, and administrators
- Observations by staff (e.g., paraeducators, office staff, bus driver, food service personnel, custodial personnel, after-school staff, coaches, etc.)
- Disciplinary history
- Hazing, Harassment, Bullying or Title IX history
- Special education records (REMINDER: If the Student of Concern has an IEP, 504, Functional Behavior Assessment (FBA), Behavior Intervention Plan (BIP), etc., the case manager should be included in the BTA team discussions about this case).
- Information from local law enforcement about the Student of Concern and their home address (e.g., any prior complaints. involvement in incidents, known trauma exposure or family changes, domestic violence, substance use, incidents of animal cruelty, sexual violence, weapon use, cyberbullying, etc.)

[7] From Dr. Jeff Pollard's phrase regarding behavioral threat assessment: "In order to connect the dots, first you must collect the dots."

- Involvement with mental health or social services (Designated Mental Health Agencies, Local or Regional Community Partners, etc.), including school-based mental health professionals.
- Presence of known problems, grievances, or losses
- Online searches regarding the Student of Concern's internet activity, social media, email, etc.

More information on how to gather information is available in the School BTA Best Practices Guide, available on the AOE BTA webpage.

Step 4: Organize and Analyze the Available Information

After gathering information from multiple sources, organize and analyze the information by discussing and answering the Key Analysis Questions below. This step is also known as "*connecting the dots*."

NOTE: BTA team members can always discuss additional questions beyond the Key Analysis Questions below. School BTA Teams are not limited to only these questions.

Key Analysis Questions

1. **Why is the BTA team discussing the Student of Concern? What behavior(s) have raised concern – and what appears to be motivating the Student of Concern to act that way?**

2. **Has the Student of Concern communicated any ideas or intent to engage in violence? If so, where / how (e.g. on social media, in a homework assignment, in a conversation, in online comments, etc.)?**

3. **Has the Student of Concern shown any <u>inappropriate</u> interest in and/or identification with any of the following:**
   - Any incident(s) of mass or targeted violence (e.g., terrorism, rampage violence, school/workplace attacks, mass murderers, stalking, etc.)
   - Previous perpetrators of targeted violence / mass violence
   - Actions / behaviors of other perpetrators (e.g. weapons used, tactical gear used, specific components of a violent plan, writing a manifesto / keeping a journal of the planning

- Identifying with the motives, grievances, and/or desperation of previous perpetrators
- Desire for fame or notoriety of previous perpetrators
- Extreme ideologies (e.g. Incel communities, True Crime Communities)

4. **Has the Student of Concern engaged in "attack-related behaviors" (i.e., any behavior where they appear to move further down the Pathway to Violence, beyond just ideas of violence toward engaging in actual harm)?**

5. **Does the Student of Concern have (or are they developing) the capacity to carry out an act of targeted violence – meaning, do they have known access to lethal weapons (or are trying to gain access) and the ability to carry out a plan?**

6. **Is the Student of Concern experiencing hopelessness, desperation, and/or despair?**

   NOTE: Please refer the student for a safety assessment or suicide screening if you are concerned about potential self-harm.

7. **Does the Student of Concern have a positive, trusting, sustained relationship with at least one responsible person?**

   NOTE: Please note if this responsible person is someone that the BTA team can involve to check-in and support the Student of Concern if needed.

8. **Does the Student of Concern see violence as a way to solve their problem(s)? Do they see violence as the only option they have left?**

   NOTE: The BTA team can intervene by providing alternate ways to help the Student of Concern solve the problem(s) that is making them feel despondent or feel there is no other way out.

9. **Is the Student of Concern's "story" – what they are telling others -- consistent with his or her actions?**

10. **Are other people concerned about the Student of Concern's potential for violence?**

11. **What circumstances might affect the likelihood that the Student of Concern will engage in violence or resort to violence – circumstances that either increase the likelihood or decrease it?**

NOTE: The BTA team should refer to their answer to this question when developing an intervention and safety plan (Step 7 in these model procedures). The BTA team can look for ways to reduce the adverse impact of negative events that may be occurring or coming up for the Student of Concern. The BTA team can also identify what is working well for the Student of Concern, such as positive events they are looking forward to, and make sure interventions do not inadvertently remove those protective factors / positive events from the Student of Concern's life.

A more detailed version of these (11) Key Analysis Questions, with sample sub-questions for discussion, is available in the School BTA Best Practices Guide, available on the AOE BTA webpage.

Step 5: Make the Assessment

After organizing and analyzing the available information, make an assessment by answering the Assessment Questions below and following the guidance based on the team's collective answers. In discussing the Assessment Questions and deciding on their answers, consider the totality of the information gathered and the Student of Concern's behavior (and context that may explain that behavior). The team should NOT focus on the Student of Concern's traits or characteristics, nor on how "similar" the Student of Concern may appear to previous attackers.

Assessment Question 1

1. **Does the Student of Concern pose a threat of violence whether to others, to self, or both?** Put another way, does the Student of Concern appear to be on a pathway to violence (do they have ideas or plans for a violent act; are they taking steps toward carrying it out)?
   - ☐ **YES**
     - If the situation appears to be an emergency or imminent safety concern, call 911 and follow emergency procedures.
     - If Student of Concern appears to pose a threat of suicide, follow your district / school suicide screening process, transport the student to a local Emergency Department, or call local law enforcement for assistance with someone who is a risk to self.
     - Skip the remaining Assessment Questions and go to Step 5a (Choose Level of Concern) then Step 6 (Develop and Implement an Intervention and Safety Plan)
     - In consultation with legal counsel, make notifications as appropriate to parent/guardian of Student of Concern and any targets (or parent/guardian of minor targets).

☐ **NO** then Go to Assessment Question 2

Assessment Question 2

2. **If the Student of Concern does not pose a threat of violence at this time, does the Student of Concern otherwise need some help / intervention re – and/or does anything need to be done to address the situation to prevent recurrence or reduce fear?**
   ☐ **YES**
   - Go to Step 5a (Choose a Level of Concern) then Step 6 (Develop and Implement an Intervention and Safety Plan).

   ☐ **NO** then Go to Step 5a then skip to Step 8.

Step 5a: Choose a Level of Concern (optional step)

After making their assessment, determine a Level of Concern. While this step is optional, choosing a Level of Concern can help teams to sort cases by category and prioritize those cases at the highest levels of concern. These levels of concern each convey two pieces of information: the BTA team's assessment and the minimal level of intervention recommended for that level.

Levels of Concern

High Concern	The Student of Concern appears to pose a threat of violence or is otherwise planning or preparing for violence. BTA team should develop and implement a plan to intervene with the Student of Concern and implement other measures to enhance the safety of targets, the school community, and the SOC. BTA team should closely monitor how the SOC responds to interventions and adjust the Intervention and Safety Plan as necessary to reduce risk. Contact AOE for assistance with critical cases.
Medium Concern	The Student of Concern does not appear to pose a threat of violence at this time but exhibits behaviors that indicate a current need for support, intervention, or other resources. BTA team should develop a plan to refer SOC to appropriate resources and/or offices, periodically monitor SOC's progress, and adjust the referral plan if necessary.

Low Concern	The Student of Concern does not appear to pose a threat of violence at this time and does not appear to need any other support or intervention. Any underlying issues can be resolved easily. BTA team can refer the matter to administrators / other relevant staff to address any remaining issues using regular district / school policies and procedures.
Unfounded or Unsubstantiated Concern	The threat could not be corroborated or substantiated, or it was determined to be a misunderstanding or behavior taken out of context. No intervention, safety, or monitoring actions are necessary.

Step 6: Develop and Implement an Intervention and Safety Plan

If the BTA team's assessment in Step 5 is that the Student of Concern poses a threat of violence to others (or to self and/or others), develop and implement a plan to intervene with the Student of Concern to help them address the problem(s), challenge(s), and/or conditions that are leading them to be in crisis, feel despondent, and/or feel that violence is a way to solve those problems.

If the BTA's assessment in Step 5 is that the Student of Concern does NOT pose a threat of violence but does need help or intervention – or something needs to be done to address the situation to prevent recurrence and reduce fear –develop a similar intervention-type plan to identify what measures are needed. In either case, Intervention and Safety Plans should address the following:

- What problems and/or conditions appear to underlie the Student of Concern's threatening / troubling / dangerous behavior?
- What needs to be done to address those problems / conditions?
- Who needs to be involved to make it happen? (Is there someone the SOC already trusts?)
- When does it need to be done?

In addition, consider the following in developing and implementing an Intervention and Safety Plan:

If there is a concern that the Student of Concern poses harm to themselves, the BTA team needs to follow the district / school procedures for suicide screening. This can be run as a parallel process and should not halt or delay the BTA process.

For a Student of Concern that has a 504 plan, IEP, BIP, or other plan under IDEA or Section 504, the BTA team needs to consult with or involve the special education teacher or case manager who works with the Student of Concern. If the school places the student of concern on suspension or changes their placement, a Manifestation Determination Review (MDR) should be conducted parallel to the BTA process. For more information on MDRs, please review the IDEA law and consult your district attorney.

In addition to identifying resources, strategies, or other things that can be done TO or ABOUT the Student of Concern, the BTA team should consider resources that can help enhance the safety of targets and the school community, as well as any steps that can be taken to improve the Student of Concern's environment or setting.

The BTA team should refer to its responses to the Analysis Questions in Step 4 – particularly the last question that asks about what factors might change in the SOC's life that might increase or decrease their likelihood of engaging in violence. The BTA team can use that information to help the Student of Concern through – or find ways to defer -- upcoming adverse events. The BTA team can also strive to keep the Student of Concern connected to resources and supports that are positive for the Student of Concern.

When considering who will facilitate certain interventions, remember that personalities and chemistry matter and can impact the effect of the intervention. A given team member may be very skilled, but just not able to relate to certain persons of interest or targets. It is acceptable to switch to alternate personnel in such a situation.

BTA teams should consider that suspension or other consequences, such as removal from the school environment, can create the risk of triggering either an immediate or a delayed violent response from a student, unless such actions are integrated with containment and support. Should the reported behavior violate district policy and result in disciplinary action, the [superintendent/head of school] should consider the timing of the imposed discipline or other punitive actions to not increase risk.

Appendix A has a list of sample resources for Intervention and Safety plans. BTA teams are encouraged to develop their own lists of resources available in their school, district, community, region, and through remote access.

Step 7: Monitor Plan and Update Assessment and Interventions

After the BTA team implements an Intervention and Safety Plan, establish a regular cadence or schedule to monitor how the Student of Concern is responding to interventions and monitor other steps taken to address the situation and possible targets. If at any point concerns are raised by BTA team members (or other educators involved in the student's Intervention and Safety Plan) that the interventions and other measures are not reducing risk, discuss and consider alternative interventions.

After interventions have been implemented and monitored, update the assessment by returning to Step 5 and answering the Assessment Questions again (with updated information from monitoring). Adjust the Intervention and Safety Plan as needed. There is no specific amount of time that a Student of Concern should be monitored.

Step 8: Document and Close the Case

Continue to monitor the plan and modify it as needed, for as long as the Student of Concern might still pose a threat. The case should only be closed when the BTA team assesses that the Student of Concern no longer poses a threat of violence and no longer requires intervention / monitoring.

A person can continue to pose a threat even after they cease to be a member of the school community. It may be necessary for the BTA team to make further referrals for the Student of Concern and/or take other follow-up steps as needed. The BTA team should be particularly aware of important and meaningful dates or events that may trigger a person to become a threat, such as anniversaries, failing a course, termination of benefits, the ending of a relationship, or the occurrence of mass attacks elsewhere.

When the case is to be closed, follow applicable regulation to determine what aspects of the case to document and where case documentation should be stored – including information that would be protected under laws governing the confidentiality of student, medical, and mental health records. More information about case documentation options is available in the Best Practices Guide.

Follow your local SD/SU/ Independent school policy for data reporting and consult with your Information Technology specialist about the secure storage of student records.

Section 3: BTA Records and Data Reporting

Confidentiality and Information Sharing

No member of a threat assessment team, including [district schools/ the school] based members and community resource / law enforcement members, shall use any student record beyond the prescribed purpose of the threat assessment team or re-disclose records obtained by being a member of the threat assessment team, except as permitted by FERPA.

Members of the threat assessment team shall make every effort to document “no threat” created in the course of a threat assessment where relevant.

Student Records

Each threat assessment team member, whether a teacher, counselor, school administrator, other school staff, contractor, consultant, volunteer, or other individual, functions as a “school official with a legitimate educational interest” in educational records controlled and maintained by the [district schools / school]. The [district schools / school] provides the threat assessment team access to educational records consistent with the Family Educational Rights and Privacy Act (FERPA).

Records created by members of the threat assessment team in the course of conducting and concluding a threat assessment are not considered academic record(s) as defined by Vermont Education Quality Standards, section 2113.3 (c).

Annual State Reporting

As part of the requirements under Act 29, Supervisory Districts, Supervisory Unions, and independent schools are required to report BTA summary and case information to AOE on an annual basis. [District schools/ the school] shall establish a procedure for tracking and documenting BTA data for this purpose and in accordance with direction from the Agency Secretary.

Critical Incident Reporting

NOTE: If a BTA situation appears to be an emergency or significant safety concern that requires protective actions (i.e., lockdown, immediate engagement of law enforcement due to a weapon on campus), School Administrators will immediately contact law enforcement and initiate emergency operations procedures. Following emergency protocols, the [superintendent/head of school] shall complete a Critical Incident Report to ensure timely coordination with additional state-level resources. The Critical Incident

Report process is managed by the Department of Public Safety in collaboration with AOE.

Following, when safe to do so, a behavioral threat assessment would be conducted in collaboration with any potential law enforcement investigation.

Appendix A – Additional Resources for Intervention and Safety Planning

Sample List of Resources for Intervention and Safety Planning

The following are possible resources that the BTA team can consider as they develop a plan to intervene with the Student of Concern to reduce risk and enhance the safety of the school community and the Student of Concern:

- Check-in / Checkout to maintain channel of communication and engagement.
    - Gather information,
    - Build rapport and relationship
    - Decrease isolation
    - De-escalate volatile reactions
    - Provide feedback and mentoring
    - Monitor reactions to grievances, interventions and precipitating events.
- Problem solving about legitimate grievances
- Parental / Family involvement
- Referral for assistance or support services, such as:
    - Academic / work assistance
    - Accommodations
    - Alternative schooling / work
    - Social skills training
    - Behavioral contracting
    - Modifications of student classroom assignment or schedule
    - Modification of work schedule or assignments
    - Alternative schooling/home schooling
    - Involvement in extra-curricular activities
        - Performance improvement plans
        - Peer coaching/mentoring
- Counseling/mental health services:
    - Check-in/check-out with school counseling staff
    - Outpatient counseling/mental health care.
    - Emergency psychiatric evaluation
- Disciplinary measures
    - Confrontation or warning
    - Administrative orders for no contact of communication
    - Parental involvement
    - In school suspension /after-school detention
    - Suspension or expulsion

    NOTE: Exclusionary discipline such as suspension or expulsion can have lasting adverse impact on a student. Moreover, separating the Student of Concern from the school does not guarantee safety for the school, diminishes the school's ability to monitor and have a positive impact on the Student of Concern, and could inadvertently increase risk posed by the student.
    - Refer the matter to criminal justice services:
        - Law enforcement / juvenile justice involvement
        - Court issued protective orders
        - Diversion program

Involving a Trusted Adult

A key to establishing an effective working relationship with the Student of Concern (as well as some targets and witnesses) is to identify a responsible person they already trust. One key step to defusing a potentially violent situation involving someone with a grievance is to allow him or her to feel "heard" and validated. Even if they cannot get their way — which oftentimes they cannot — feeling as if someone has understood their position can go a long way toward moving the Student of Concern away from thoughts and plans of violence. If the BTA team cannot find someone that the Student of Concern already trusts, the BTA team can identify or suggest a trusted adult in the school or community to serve in this role.

Target Safety Planning Resources

Where targets are identified, consider ways to help target(s) reduce their vulnerability to harm where possible. Consider things the target can do (or be coached or supported in) that increase their safety. Examples include:

- Setting clear limits and boundaries with subjects regarding communications and contacts
- Monitor communications for changes / escalations by Student of Concern
- Minimize contact with or reaction to Student of Concern
- Document all contacts from/with Student of Concern
- Minimize social media activity or post events or plans after they have occurred.
- Maintain/enhance situational awareness (hard to do when we walk around looking at our phones!)
- Develop contingency plans for escape, shelter, defense
- Utilize support systems – being/feeling like a target can be stressful.

Environmental/Systemic Case Management Strategies

Cases often help teams identify environmental or systemic gaps that impacted on situations. As part of reducing the threat posed by a Student of Concern, consider necessary or desired modifications to the environment. Examples include:

- Address factors in a situation that may escalate concerning behavior
- Separate Student of Concern from associates or other influences that support violent behavior
- Enhance classroom management skills of relevant instructional staff
- Enhance school climate

Manage/Monitor Possible Precipitating Events

As the case moves forward, other circumstances in the lives of the Student of Concern, targets and others may impact the case. Not all of these can be anticipated. However, when the team does identify potential precipitating events, they should build a plan to prevent or lessen their impact (when possible) or to at least monitor for their impact. Examples include:

- Minimize unnecessary precipitants where possible (look to systemic issues that unnecessarily impact case)
- Consider impact of timing and location of interventions
- Monitor and plan for loss / perceived injustice
- Monitor and plan for key dates / events in the process of case management
- Monitor impact of any current high-profile violent events, suicides

State-level Anonymous Reporting

In establishing a BTA program and building a multi-disciplinary BTA team, SU/SD's and schools are encouraged to establish mechanisms for BTA teams to receive reports of concerning or unsafe behavior. Where needed, the Vermont State Police offers a "**Suspicious Activity Tip Line**" through the Vermont Intelligence Center and Law Enforcement Support Center. More information is available at https://vsp.vermont.gov/divisions/criminal/bci/tipline. Call **844-848-8477** or Submit a tip online.

Issue Date: May 23, 2025

AOE Model Policy:

Behavioral Threat Assessment Teams

Statement of Policy

The [SU/SD or School] is committed to providing a safe and secure learning environment for students and staff. This policy establishes a school behavioral threat assessment (BTA) and management program to conduct a fact-based, systematic process designed to gather information about, assess and manage behavior or communication that raises a concern that a person or situation may pose a threat of severe and significant targeted violence against the school community.

Nothing in this policy precludes [SU/SD or School] personnel from acting immediately to address an imminent threat, including immediately removing a student from school, subject to subsequent due process procedures when the student poses an immediate threat to themself, others, property, or the educational environment[1].

The threat assessment process is distinct from and does not supplant the [SU/SD or School's] student conduct and discipline policy. A behavioral threat assessment will not impose suspension or expulsion, including emergency suspension, solely for investigating student conduct or conducting a threat assessment. Any action that could result in removal of a student from the student's school environment pending or after a threat assessment will only be carried out in accordance with 16 V.S.A. § 1162, State Board of Education Rule 4300, and federal and state law applicable to students with disabilities. Behavioral threat assessment teams will operate in a manner that avoids bias, discrimination, and disproportionate impact on students in historically marginalized communities.

Threat assessment is not intended to refer students to the criminal justice system, but to facilitate the provision of resources and support to a student and to mitigate potential acts of violence. Law enforcement referral is not appropriate in the case of student behavior that is a violation of the school conduct code but that is not also a crime. This policy also exists to ensure compliance with 16 VSA § 1485.

[1] Vermont State Board of Education Rule 4311.3

Administrative Procedures

The Superintendent/Head of School or designee will establish procedures to:

1. Govern the functions of the Behavioral Threat Assessment Team. At minimum, the procedures will be consistent with the methodologies provided in the model BTA procedures and Best Practices provided by the Agency of Education;

2. Ensure an individual's behavior rather than an individual's demographic or personal characteristics will serve as the basis for a behavioral threat assessment;

3. Establish a mechanism which allows for students, staff and others to report threatening and troubling behavior to the behavioral threat assessment team;

4. Provide for:

    a. involvement of law enforcement (outside of the inclusion of a School or District Resource Officer), that aligns with the model procedures issued by the Agency of Education, or

    b. referral to law enforcement in the case of imminent danger to individuals or the school community when the conduct constitutes a crime.

5. Ensure that each threat assessment team member, whether a teacher, counselor, school administrator, other school staff, contractor, consultant, or other individual, functions as a "school official with a legitimate educational interest" in educational records controlled and maintained by the [SU/SD or School] as specified by the Family Educational Rights and Privacy Act (FERPA)

6. Provide for the collection and submission of data related to the behavioral threat assessment program to the Agency of Education as required by 16 VSA § 1485 (e).

7. Ensure behavioral threat assessment team members receive training at least annually in best practices of conducting behavioral threat assessments, as well as bias training.

Title I Part A Comparability Compliance Procedure
Washington Central Unified Union School District
School Year: 2021-2022
Date of last revision: April 28, 2021
Reviewed December 12, 2022
Reviewed November 1, 2023*
Reviewed October 14, 2024**

***School board policy D4: Title I Comparability linked to this document November 1, 2023**

****VT AOE is collecting data via Cognito forms for FY25, not the Grants Management System**

Comparability is an annual requirement for the Washington Central Unified Union School District to be eligible to receive Title I Part A funds. To demonstrate comparability on an annual basis, the Washington Central Unified Union School District Office of the Superintendent oversees the computation of the ratio of students to instructional staff at each school within a grade span. To ensure accuracy of reporting, data will be collected on the same date within the school year. The date is AOE fall DC 06 ADM collection date of October 1.

The Data Manager and CFP Team Leader will perform the comparability demonstration calculations using the Vermont Agency of Education comparability instructions and forms within the Grants Management System**. The comparability demonstration will be completed by November 1st of each year so that any necessary adjustments in staffing can be in place by December 1st.

When a Title I school does not meet comparability, State and local resources that are provided to the school will be adjusted to bring the school into comparability with the other schools at the same grade-span. The Washington Central Unified Union School District Superintendent and Business Administrator responsible for staffing will participate in making staff adjustments. Adjustments will be made in a timely manner by no later than December 1st to get schools back into a comparable position to avoid Title I financial sanctions.

Comparability Compliance Timeline

August - September- CFP Team Leader

- Conduct meetings with appropriate LEA representatives to discuss and review the requirements for completing the annual comparability calculations.

- Review and establish (if needed) participants' roles and responsibilities.
- Review and update procedures, including the timeline for completion of the calculations.
- Obtain preliminary information from appropriate LEA staff.
- Be aware and look for notifications from the Vermont Agency of Education regarding updates on the Title I Comparability Report module.

October - November

- Determine the date and collection methodologies for gathering data needed to complete calculations. Data Manager
- Complete Comparability Report within the Grants Management System. CFP Team Leader
- Make adjustments as needed to get schools back into a comparable position. CFP Team Leader and Business Administrator

December - July

- Periodically verify the data and check comparability throughout the second half of the school year by March 1. CFP Team Leader and Data Manager
- Continue to make adjustments as needed to get schools back into a comparable position.CFP Team Leader and Business Administrator
- The LEA will keep the comparability requirement in mind as it plans for the allocation of instructional staff and resources to schools for the coming school year. This would enable the LEA to minimize the potential for disruption in the middle of a school year, should adjustments need to be made to ensure that Title I schools are comparable to non-Title I schools.CFP Team Leader, Business Administrator and Superintendent
- Key stakeholders engage in LEA-level budget (State and local funds) discussions concerning staff assignments, and distribution of equipment and materials for the purpose of ensuring compliance with Title I comparability requirements for the upcoming school year. Business Administrator/Superintendent
- Identify LEA Title I schools and non-Title I schools. CFP Team Leader

Records:

- The Washington Central Unified Union School District will keep a PDF copy of the completed comparability report(s) with both the CFP Team Leader and Financial Accountant for audit purposes.
- The Washington Central Unified Union School District will maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all Title I schools are comparable. Any report used for documentation will be signed and dated by the person issuing the report.

References:

- Every Student Succeeds Act (ESSA) – Section 1118(c)
- The U.S. Department of Education Non-Regulatory Guidance: Title I Fiscal Issues
- The Vermont Agency of Education Title I Part A Comparability Guidance Document

WASHINGTON CENTRAL UNIFIED UNION SCHOOL DISTRICT

Board of Directors' Policy

POLICY: C47

WARNED: 6/1/19

ADOPTED: 6/26/19

EFFECTIVE: 7/1/19

STUDENT EXCHANGES

Exchanges of students between school districts can provide educational and personal benefits for the students involved. In many cases, such exchanges also benefit the school as a whole, as the participants make valuable contributions to the schools they attend.

In the acceptance of foreign or domestic exchange students, Washington Central Unified Union School District students and staff find unique opportunities to learn and understand people and cultures different from their own.

WCUUSD encourages such exchange programs and similarly encourages the providing of programs which allow WCUUSD students an opportunity to travel, live, and study in other cultural settings.

PROCEDURES

Area Schools Student Exchanges

The principal is authorized to approve one-for-one exchanges of WCUUSD resident students with students who reside in other school districts providing that the principal of the non-resident's school has similarly approved the proposed exchange. In approving such proposed exchanges, the principal shall follow the procedures as listed below:

1. Only one-for-one exchanges may be made. For every non-resident student accepted under this program a resident student must be accepted at the school that the non-resident students would have otherwise attended.

2. An application for an exchange must be made in writing to the Principal of the receiving school with a copy to the Principal of the sending school.

3. Applications must be made annually. Number of years in the program will be considered in determining priority for renewal. Renewal requests must be received on or before May 1st prior to the year of the requested attendance. Renewal applications received after May 1st will be treated on the same basis as new requests.

4. All new requests will be considered according to the order in which they are received.

5. Special education students will be considered only if the proposed exchange is approved by the student's I.E.P. team and the receiving school determines that the student's special needs can be met without added burden of cost or resources to the school system.

6. Students will not be accepted who have a history of behavior or attendance problems unless it is mutually agreed by the two principals that the change in schools shows genuine promise of correcting the problem(s).

7. Transportation of the student will be the sole responsibility of the parent or guardian.

8. Students accepted under this exchange program will be entered on the school register as tuition non-resident students (for whom tuition payment is waived by the Board) thereby making them eligible to represent WCUUSD on all activities under the sponsorship of the Vermont Headmasters' Association.

9. No students will be approved for exchange after September 30 each year unless the circumstances are extenuating and beyond the control of the student.

10. Once a student has been notified of acceptance, his/her place is assured for the forthcoming school year.

Foreign and Domestic Exchange Programs

Application from a student applying for admission to WCUUSD under the sponsorship of an approved foreign or domestic exchange program will be screened by the principal to determine whether all of the below listed guidelines have been met and/or agreed to by all parties. Upon completion of said screening, the principal shall make a recommendation to the superintendent regarding the acceptance of the student. The superintendent shall in turn inform the Board of accepted students.

1. The student must be sponsored by a recognized and approved (as per the Vermont Headmasters' Association) agency or organization whose prime purpose is to provide pupil exchange programs

2. The student must have approved arrangements to reside with a family living within the school district.

3. The student must demonstrate a level or proficiency in written and spoken English sufficient to enable him/her to benefit from the academic program of the school without undue hardship to the instructors and other students.

4. The student will not be granted at U-32 High School diploma although the student, if a senior, will be allowed to participate in the graduation exercises and may be granted an honorary diploma at the discretion of the principal.

5. The students will not receive an official transcript or be granted any academic credit from a WCUUSD school, although, at the student's request, the school will supply the student with a statement indicating the student's program of study and level of achievement. The awarding of actual academic credit for work completed at WCUUSD school will be solely at the discretion of the student's home school.

6. The student will not be enrolled in driver education.

Exception

Students who do not meet all of the stated conditions, but who are worthy of special consideration in the judgment of the principal, may be granted admission by the Board upon the recommendation of the principal.

WASHINGTON CENTRAL UNIFIED UNION SCHOOL DISTRICT

Board of Directors' Policy

POLICY:	**C34**
WARNED:	**6/1/19**
ADOPTED:	**6/26/19**
EFFECTIVE:	**7/1/19**

USE OF RESTRAINT AND SECLUSION

Section 1. Statement of Purpose

1.1 It is the policy of this unified union school district that students not be subjected to inappropriate restraint or seclusion as defined by Vermont State Board of Education Rule 4500. It is the district/supervisory union's intent to create and maintain a positive and safe learning environment, and promote positive behavioral interventions and supports in district schools. This policy is further intended to assist in creating a common understanding within the district of appropriate interventions by district staff.

Section 2. Definitions. The following terms, as defined in State Board Rule 4500.3, shall apply to this policy.

2.1 **Behavioral Intervention Plan** means a plan that details strategies to address behaviors that impede learning, or are ongoing, and do not readily respond to general intervention or classroom management techniques, by teaching pro-social skills and other positive replacement behaviors. The plan may include positive strategies, program or curricular modifications, and supplementary aids and supports required to address problem behaviors.

2.2 **Chemical Restraint** means a drug, medication or chemical used on a student to control behavior or restrict movement that is not:

a. Prescribed by a student's licensed physician for the standard treatment of a student's medical or psychiatric condition; and

b. Administered as prescribed by the licensed physician.

2.3 **Functional Behavioral Assessment** means the analysis of a student's behavior patterns before, during, and after rule-breaking or other inappropriate behavior for the purpose of guiding the development of a behavioral intervention plan.

2.4 **Mechanical Restraint** means the use of any device or object that restricts a student's movement or limits a student's sensory or motor functions unless under the direction of a healthcare professional for medical or therapeutic purposes. The term does not include devices implemented by trained school personnel, or utilized by a student for the specific and approved therapeutic and safety purposes for which such devices were designed including:

a. Restraints for medical immobilization,

b. Adaptive devices or mechanical supports used to achieve proper body position, balance or alignment;

c. Vehicle safety restraints including a seat belt or harness used for balance or

safety on a car or bus; or
d. Seat belts in wheelchairs or on toilets.

2.5 **Parent** means:
a. A biological or adoptive parent of the child;
b. A legal guardian of the child;
c. A person acting in place of a biological or adoptive parent, including a grandparent, stepparent or other relative with whom the child lives, or a person legally responsible for the child's welfare;
d. A foster parent or developmental home provider who has been appointed the educational surrogate parent by the Educational surrogate Parent Program; or
e. An educational surrogate parent.

2.6 **Physical Escort** means the temporary touching or holding, without the use of force, of the hand, wrist, arm, or back of a student who is exhibiting minimal resistance for the purpose of directing movement from one place to another.

2.7 **Physical Restraint** means the use of physical force to prevent an imminent and substantial risk of bodily harm to the student or others. Physical restraint does not include:
a. Momentary periods of physical restriction by direct person-to-person contact, accomplished with limited force and designed either
i. to prevent a student from completing an act that would result in potential physical harm to himself/herself or another person; or
ii. to remove a disruptive student who is unwilling to leave the area voluntarily;
b. The minimum contact necessary to physically escort a student from one place to another;
c. Hand-over-hand assistance with feeding or task completion; or
d. Techniques prescribed by a qualified medical professional for reason of safety or for therapeutic or medical treatment.

2.8 **Positive Behavioral Interventions and Supports** means an approach to preventing and responding to targeted behavior that:
a. Is based on evidence-based practices;
b. Is proactive and instructional, rather than reactive;
c. Can operate on individual, group, classroom, or school wide levels;
d. Includes a system of continual data collection; and
e. Relies on data-driven decisions.

2.9 **Prone Physical Restraint** means holding a student face down on his or her stomach using physical force for the purpose of controlling the student's movement.

2.10 School means a learning environment receiving public funds or over which the Vermont Department of Education has regulatory authority.

2.11 **School Personnel** means individuals working in schools as defined in 4500.3(10) who are employed by the school or who perform services for the school on a contractual basis, and school resource officers, while acting in that capacity.

2.12. **Seclusion** means the confinement of a student alone in a room or area from which the student is prevented or reasonably believes he or she will be prevented from leaving. Seclusion does not include time-out where a student is not left alone and is under adult supervision.

2.13 **Substantial Risk** means an imminent threat of bodily harm where there is an ability to enact such harm. Substantial risk shall exist only if all other less restrictive alternatives to defuse the situation have been exhausted or failed or the level of risk prohibits exhausting other means.

2.14 **Supine Physical Restraint** means holding a student on his or her back using physical force for the purpose of controlling the student's movement.

2.15 **Student** means a student enrolled in a school as defined in paragraph 10.

Section 3. Policy

3.1 The superintendent or his or her designee shall develop administrative procedures to ensure district compliance with the requirements of Vermont State Board of Education Rule 4500. The administrative procedures shall include at least the following components.

3.2 Prohibitions against the imposition on students of mechanical or chemical restraints by school personnel and contract service providers.[1]

3.3 Prohibitions against the imposition on students of physical restraint in circumstances designated as impermissible by State Board of Education rules.[2]

3.4 Restrictions on the use of physical restraint and seclusion to circumstances allowed by State Board of Education rules, including provisions that allow the inclusion of restraint or seclusion as part of a student's individual safety plan only when that plan meets the conditions set forth in State Board of Education rules, and provisions that require the termination of restraint or seclusion, and the monitoring of students subjected to restraint or seclusion, as established by State Board of Education rules.[3]

3.5 Procedures to ensure that only school personnel or contract service providers who are trained in the use of restraint and seclusion are authorized to impose restraint or seclusion unless, due to the unforeseeable nature of the danger of a particular circumstance, trained personnel are not immediately available.[4]

3.6 Processes to ensure that impositions of restraint or seclusion are reported to school administrators, parents, superintendents and the Commissioner of the Vermont Department of Education under circumstances and within the time limitations required by State Board of Education rules.[5]

3.7 Processes to ensure that each school in the district maintains written records of each use of restraint and seclusion in accordance with the requirements of State Board of Education rules.[6]

3.8 Procedures to ensure that each school in the district implements follow-up procedures that are consistent with the requirements of State Board of Education rules.[7]

[1] *See* Vermont State Board of Education Manual of Rules and Practices Rule 4501.1.
[2] *See* SBE Rule 4501.2.
[3] *See* SBE Rule 4502.
[4] *See* SBE Rules 4502.3 and 4502.4.
[5] *See* SBE Rule 4503.
[6] *See* SBE Rule 4504.
[7] *See* SBE Rule 4505.

3.9 Annual notification procedures to ensure that each school in the district informs school personnel and parents of students enrolled in the school of the policies and procedures pertaining to the use of physical restraint and seclusion, and the intent of the school to emphasize the use of positive behavioral interventions as well as supports and its intention to avoid the use of physical restraint or seclusion to address targeted student behavior.[8]

3.10 Processes for the filing, investigation and resolution of complaints by school personnel or parents regarding the use of restraint or seclusion, including the designation of school officials who are authorized to receive complaints. The procedures for resolving complaints shall require that any complaint regarding the use of restraint or seclusion is investigated and written findings are issued within thirty (30) days of the complaint's receipt. If a complaint regarding the use of restraint or seclusion is unresolved at the school building level, it shall be directed to the superintendent in accordance with the complaint processes established by the Board in Policy B22.[9]

Section 4. Implementation

The superintendent shall ensure that appropriate staff are provided training by programs recommended by the Vermont Department of Education unless he or she submits a plan to the Commissioner of Education demonstrating how a training program not recommended by the Department of Education contains the elements required of recommended programs and meets the purposes of the State Board of Education rules on restraint and seclusion.[10]

The superintendent shall report annually to the Board on the implementation of the administrative procedures required by this policy, and shall include in his or her report recommendations for changes, if any, to related school district/supervisory union policies or procedures.[11]

[8] *See* SBE Rule 4506.
[9] *See* SBE Rule 4507
[10] *See* SBE Rule 4509, 4510.
[11] 16 V.S.A. 563

CODE C70[1]
(Recommended)

USE OF RESTRAINT AND SECLUSION

Section 1. Statement of Purpose

It is the policy of the _____ school district/supervisory union that students not be subjected to inappropriate restraint or seclusion as defined by Vermont State Board of Education Rule 4500. It is the district/supervisory union's intent to create and maintain a positive and safe learning environment, and promote positive behavioral interventions and supports in district schools. This policy is further intended to assist in creating a common understanding within the district/supervisory union of appropriate interventions by district staff.

Section 2. Definitions

The following terms are defined in State Board Rule 4500.3 and shall apply to this policy.[2]

2.1 Behavioral Intervention Plan
2.2 Chemical Restraint
2.3 Functional Behavioral Assessment
2.4 Mechanical Restraint
2.5 Parent
2.6 Physical Escort
2.7 Physical Restraint
2.8 Positive Behavioral Interventions and Supports
2.9 Prone Physical Restraint
2.10 School
2.11 School Personnel
2.12 Seclusion
2.13 Substantial Risk
2.14 Supine Physical Restraint
2.15 Student

Section 3. Policy

The superintendent or designee shall develop administrative procedures to ensure district/ supervisory union compliance with the requirements of Vermont State Board of Education Rule 4500. The administrative procedures shall include at least the following components:

1. Prohibitions against the imposition on students of mechanical or chemical restraints by school personnel and contract service providers.[3]

[1] The State Board Rules do not require adoption of a policy by individual school boards, however the VSBA recommends that boards consider adopting a policy, based on this model, that requires compliance with the Rule 4500 and establishes criteria for the development of administrative procedures to implement practices consistent with the Rule.
[2] Each of the terms defined in this model policy is defined in State Board Rule 4500.3.
[3] *See* Vermont State Board of Education Manual of Rules and Practices Rule 4501.1.

2. Prohibitions against the imposition on students of physical restraint in circumstances designated as impermissible by State Board of Education rules.[4]

3. Restrictions on the use of physical restraint and seclusion to circumstances allowed by State Board of Education rules, including provisions that allow the inclusion of restraint or seclusion as part of a student's individual safety plan only when that plan meets the conditions set forth in State Board of Education rules, and provisions that require the termination of restraint or seclusion, and the monitoring of students subjected to restraint or seclusion, as established by State Board of Education rules.[5]

4. Procedures to ensure that only school personnel or contract service providers who are trained in the use of restraint and seclusion are authorized to impose restraint or seclusion unless, due to the unforeseeable nature of the danger of a particular circumstance, trained personnel are not immediately available.[6]

5. Processes to ensure that impositions of restraint or seclusion are reported to school administrators, parents, superintendents and the Secretary of the Vermont Agency of Education under circumstances and within the time limitations required by State Board of Education rules.[7]

6. Processes to ensure that each school in the district/supervisory union maintains written records of each use of restraint and seclusion in accordance with the requirements of State Board of Education rules.[8]

7. Procedures to ensure that each school in the district/supervisory union implements follow-up procedures that are consistent with the requirements of State Board of Education rules.[9]

8. Annual notification procedures to ensure that each school in the district/supervisory union informs school personnel and parents of students enrolled in the school of the policies and procedures pertaining to the use of physical restraint and seclusion, and the intent of the school to emphasize the use of positive behavioral interventions as well as supports and its intention to avoid the use of physical restraint or seclusion to address targeted student behavior.[10]

9. Processes for the filing, investigation and resolution of complaints by school personnel or parents regarding the use of restraint or seclusion, including the designation of school officials who are authorized to receive complaints. The procedures for resolving complaints shall require that any complaint regarding the use of restraint or seclusion is investigated and written findings are issued within thirty (30) days of the complaint's receipt. If a complaint regarding the use of restraint or seclusion is unresolved at the school building level, it shall be directed to the superintendent in accordance with the complaint processes established by the Board in Policy (insert reference to board policy on complaints).[11]

Section 4. Implementation

The superintendent shall ensure that appropriate staff are provided training by programs recommended by the Vermont Agency of Education unless a plan is submitted to the Secretary

[4] *See* SBE Rule 4501.2.
[5] *See* SBE Rule 4502.
[6] *See* SBE Rules 4502.3 and 4502.4.
[7] *See* SBE Rule 4503.
[8] *See* SBE Rule 4504.
[9] *See* SBE Rule 4505.
[10] *See* SBE Rule 4506.
[11] *See* SBE Rule 4507

of Education demonstrating how a training program not recommended by the Agency of Education contains the elements required of recommended programs and meets the purposes of the State Board of Education rules on restraint and seclusion.[12]

The superintendent shall report annually to the Board on the implementation of the administrative procedures required by this policy, and shall include any recommendations for changes, if any, related to school district/supervisory union policies or procedures.[13]

VSBA Version:	*January 25, 2022*
Date Warned:	
Date Adopted:	
Legal Reference(s):	*Vermont State Board of Education Rule 4500-4510* *16 V.S.A. 563*
Cross Reference:	*C1 Student Records*

[12] *See* SBE Rule 4509, 4510.

[13] 16 V.S.A. 563 authorizes, but does not require, boards to approve administrative rules and regulations. Likewise, the provision for annual reports from the superintendent in this model policy is not required by state law.

WASHINGTON CENTRAL UNIFIED UNION SCHOOL DISTRICT **Board of Directors' Policy** **FLAG RAISING**	**POLICY:** F46 **WARNED:** 3/17/21 **ADOPTED:** 4.28.21 **EFFECTIVE:**

Policy

It is the policy of WCUUSD that the School Board may, from time to time, decide to fly a flag on school grounds, in addition to the United States and Vermont flags, in accordance with the criteria set forth below. In all cases, the raising and display of a flag on a school flagpole in this District shall remain a matter of the Board's discretion and shall be considered an expressive act of the School District itself. This Policy is not intended to and does not create a forum for speech by students or any members of the school community.

Criteria include:

- The request to fly a flag must originate from a WCUUSD student group.
- The flag must represent ideas that align with and support the current District Mission, Goals and Student Learning Outcomes.
- The flag may not depict symbols or language that are understood to promote hate or the supremacy of one group over others.
- The flag may not include content that is vulgar, religious, commercial, or subject to trademark or similar restrictions.
- The flag shall remain on the school flagpole through the end of the school year and shall then be removed, unless the Board elects a different timeframe.
- The Board may invite comment from the community, including students.

School administration, in consultation with the School Board, will develop operating procedures to implement this Policy.