



MONITORING REPORT

January 17, 2025

Policy: **3.2 & 3.4**

Policy Category: **Ends**

Period Monitored: **2023 - 2024 School Year**

*This is the monitoring report on the Board of Education's Ends Policy 3.2 & 3.4.
This report is presented in accordance with the Board's monitoring schedule.
I certify that the information is true and complete.*

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BOARD END POLICIES AND INTERPRETATION

Jeffco Public Schools is deeply committed to fostering equity and inclusion across all facets of our organization. This commitment is demonstrated in our policies, budget allocations, and curriculum and resource decisions, which are intentionally designed

to honor and reflect the diverse identities, strengths, experiences, and needs of our students, families, and staff.

Recognizing the interconnectedness between the establishment of these distinct practices and the importance of communicating, training, and implementing them, we are monitoring these two End policies together.

3.2 - Policy, budget, and curriculum decisions will be reflective of students' abilities, socioeconomics, ethnicities, races, religions, sexual orientations and gender identities.

3.4 - Every student's, family's, and employee's abilities, ethnicities, races, religions, sexual orientations, and gender identities will be respected in all Jeffco Public Schools spaces.

We interpret this to mean:

Board Ends 3.2 ensures an inclusive and equitable learning environment, district policy, school/department budgets and curriculum and resource decisions must be reflective of our students' diverse needs across a wide range of abilities and demographics.

Board Ends 3.4 ensures our stakeholders understand the district's commitment to non-discrimination through the offering of professional learning/training, policies, committees and complaint processes, and that violations of these standards will be taken seriously. The district will develop resources, structures and systems designed to ensure equal opportunity for staff, families and students regardless of background.

We fulfill this promise through:

- Ensuring policy revisions and/or adoptions reflect and recognize diverse student needs
- Aligning Title I and student-based at-risk allocations to diverse student needs
- Implementing curriculum and resources that make learning accessible and engaging for all students
- Adopting and disseminating comprehensive anti-discrimination policies
- Creating and implementing effective informal and formal complaint processes
- Providing non-discrimination training districtwide
- Tracking internal and external civil rights complaints to spot issues and improve systems
- Making available a district Ombudsman to help resolve issues between parties through informal processes

- Partnering with JCEA to create the Equity Accountability Committee representative of diverse stakeholders devoted to working towards advancing equity (racial, sexual orientation, gender, age, access to learning in relation to socio-economic concerns, etc.) in Jeffco

CONTEXT & BACKGROUND

This monitoring report provides an overview of Jeffco Public Schools' efforts to comply with Board of Education's Ends Policies 3.2 and 3.4, ensuring equitable and respectful district policies, budget, curriculum, training, and programming practices for all stakeholders during the 2024-2025 school year.

Jeffco Public Schools remains steadfast in its dedication to **Board Ends 3.2 and 3.4**, focusing on fostering an inclusive and equitable environment where all students, families, and staff feel respected and supported. These Ends policies guide the district's efforts to ensure that policies, budgets, training, curricula, and resources reflect the diverse identities, needs, and experiences of our community.

Jeffco Public Schools serves a diverse student population*:

- Gender: Males 51%, Females: 49%
- Free or Reduced Lunch eligible students: 32.5%
- Race/Ethnicity: White 66%, Hispanic 25%, two or more races 4%, Asian 3%, Black 1% and American Indian or Alaska Native and Pacific Islander less than 1%
- Gifted/Talented: 11.2%
- Individualized Education Plans: 12.8%
- Multilingual learners: 7.4%

We are committed to addressing the unique and diverse needs of each student we serve through a variety of focused efforts, recognizing that every student deserves to be known by name, strength, and need, feel a true sense of belonging, and have access to the opportunities and resources they need to achieve academic success.

*Descriptive demographics are provided on the [CDE District Dashboard](#)

Key Definitions are provided in the [Appendix](#).

DISTRICT POLICY

In the summer of 2024, the District updated a number of key anti-discrimination policies. The changes were partially informed by two significant legal changes. The first was Colorado [SB23-296](#) (Prevent Harassment and Discrimination in Schools), which required certain new policies effective July 1, 2024, including development of a formal process for student discrimination complaints. The second, SB23-172 (Protecting Opportunities and Workers' Rights Act), revised the statutory framework

for employee harassment claims and required improved systems for maintaining records of discrimination complaints.

The policy update did more than address statutory changes, it sought to improve navigation by separating out employment non-discrimination policies (for employees and applicants) and student non-discrimination policies.

Policy AC (Non-discrimination and Equal Opportunity). Revised Policy AC has been abbreviated substantially, stating the district's commitment to non-discrimination while mapping to more specific policies for students (J series), staff (G series), and the general public. Policy AC was also revised to align the definition of "harassment" to changes in state law.

Policy GBA (Equal Employment Opportunity and Discrimination Complaint Process). Content reflecting the district's commitment to equal opportunity hiring and non-discrimination in employment was previously located in former Policy Regulation AC-R2. Not only were those commitments relocated, but Policy GBA was overhauled to link to the district's new and more robust discrimination complaint form and process.

Policy JB (Equal Educational Opportunity). Policy JB reflects the district's full commitment to educational opportunity for all students. While the policy itself was not revised in 2023-24, the district adopted several regulations regarding complaint processes available to students who believe they have been subject to discrimination or harassment on the basis of protected status:

- **Policy Regulation JB-R1 (Student Discrimination Complaint Process).** In 2023, the Colorado General Assembly passed Senate Bill 296 regarding protected status discrimination against students in public schools. Among other things, the bill required school districts to develop and publicize a process under which students could file discrimination and harassment complaints. New Policy Regulation JB-R1 reflects the Jeffco Policy. The availability of the complaint process is advertised in posters that are displayed in all buildings and is also linked in the student handbook.
- **Policy Regulation JB-R2 (Equal Education Opportunities - Transgender students).** Regulation JB-R2 (revised from former JB-R1) This regulation has been streamlined slightly from its predecessor, with more detailed guidance regarding accommodations for transgender students moved to a separate guidance document available for Jeffco administrators. The revised regulation also contains new language explaining how both "preferred gender" and "legal gender" are addressed in the district's student information system.
- **Policy Regulation JB-R3 (Grievance Procedure for Section 504 of the Rehabilitation Act).** New regulation JB-R3 creates a process for complaints under Section 504 (disability).

Policy JBB (Sexual harassment grievance policy). New Policy JBB moves the student sexual harassment complaint process to a standalone policy for ease of navigation. The new policy and process reflects minor adjustments to reflect the

2024 amendments to the Title IX rules. Finally, it contains a link to a user-friendly [complaint form](#) that allows students or staff to report incidents of sex discrimination or harassment directly to the District's Title IX coordinator.

BUDGETING AND FINANCIAL RESOURCES

The district prioritizes financial resources to support our at-risk students and students with diverse needs in several ways. Research shows that supporting the needs of students who are at-risk typically involves spending approximately 20% more per student.

The district allocates supplemental financial resources to schools as follows:

- All schools receive supplemental funds per at-risk student, as part of their school budget allocation; in 2024-25, this adds **\$1,217** to the per student budget allocation for each at-risk student in the district for a combined investment of approximately **\$27 million**
- Designated Title I schools receive additional funds (on top of the at-risk supplement) for each at-risk student; Title I designation explicitly recognizes that schools with higher concentrations of poverty have additional needs; three tiers of funding distribute **\$559, or \$897, or \$923** per at-risk student in addition to the standard at-risk allocation for a combined investment of approximately **\$8.5 million**

Schools budget these resources in a streamlined process. Analysis shows that schools receiving higher amounts of at-risk funding generally have smaller class sizes and lower overall ratios of students per staff. Effectively, these funds are spent on personnel that help differentiate learning and experiences for our at-risk students.

Consistent with state statute and federal grant compliance requirements, the district prepares and publicly presents regular financial reports and budgets each year. This report is not designed to supplant any of the regular and required financial reports and presentations.

CURRICULA AND RESOURCES

The [October 2024 Monitoring Report 1.3](#) provided an extensive review of curricula and resources to the Jeffco Board of Education.

DISTRICTWIDE TRAINING

Districtwide training is a cornerstone of advancing equity across Jeffco. These trainings are designed to equip staff with the knowledge, skills, and resources they need to promote equity both in the classroom and in the workplace. These professional learning opportunities empower educators and leaders to foster learning and work environments where all students and staff feel valued, supported, and able to thrive.

During the 2023-2024 school year, Jeffco employees were required to complete

training in the following areas:

- Jeffco Schools Child Protection Training (all employees)
- Jeffco Schools Title IX Responsible Employee Training (non-administrative employees)
- Jeffco Schools Title IX Regulations, Requirements, and Procedures for Administrators

Subsequently, during the 2024-25 school year, all district staff will be required to complete mandatory trainings on non-discrimination practices, emphasizing protections for students under Title IX and Senate Bill 23-296 including training in the following areas:

- Jeffco's Addressing Student Discrimination and Harassment Concerns - this training emphasizes protections for students against discriminatory practices at school as outlined in Title IX and Senate Bill 23-296. It references the district's nondiscrimination policies (AC, GBA, JB & JBB) as well as the student discrimination complaint process (JB-R1).

In addition to the required districtwide training, Jeffco partnered with the organization StandUp to co-design a "train-the-trainer" equity professional learning series. This collaboration resulted in the development of four equity-focused professional learning modules, which will be rolled out sequentially to Jeffco educators and staff on a staggered timeline. The first module, Understanding Implicit Bias, has already begun implementation in the 24/25 school year with early adopter schools and central teams actively participating in this foundational professional learning. The equity professional learning experience will equip our educators and leaders with actionable strategies to address biases, foster inclusion, and promote equity in classrooms and workplaces throughout the district through self-reflection and increasing adult emotional intelligence.

Conflict Mediation training was delivered to all school and central leaders during the July 2024 Leadership Launch. This professional learning was collaboratively developed by members of the Family and Community Partnerships team, the Restorative Practices team, and our Jeffco HR partners. The training was anchored in the resource "The Principal's Guide to Conflict Management," providing leaders with practical strategies and frameworks to effectively address and resolve conflicts within their school communities and teams. By training our leaders to address conflict effectively, we foster safe and inclusive communities that build trust, encourage collaboration, and ensure more equitable opportunities for all.

IMPROVED SYSTEMS FOR CIVIL RIGHTS COMPLAINTS

For 2023-24, District leadership prioritized the need to significantly overhaul systems for receiving and processing reports of discrimination or harassment. Through both improved reporting systems and committing greater staff resources to matters of equity and discrimination, Jeffco will continue its focus on equity and belonging for all.

In the summer of 2024, Jeffco unveiled a new online reporting system for civil rights complaints. Students, staff, and the general public all may report concerns through a new [webform](#) that uses the “Speakfully” platform.

The district also created two new positions—one in Legal and one in Human Resources—specific to handling discrimination complaints. In the Legal Department, the Staff Attorney for Non-Discrimination, Title IX, and Student Equity receives, evaluates, and investigates complaints of protected status discrimination or harassment involving students. In HR, the Executive Director for Equal Employment Opportunity Compliance similarly handles complaints involving workplace conduct and hiring practices. All complaints flow from the Speakfully form directly to the responsible member of #Team Jeffco. After submission, all complaints are now retained in a database, which then can assist staff in tracking patterns to drive intervention or training.

EQUITY OMBUDS PROGRAM

The Equity Ombudsman, established through Article 22 of the JCEA agreement and led by Bill de la Cruz, serves as an independent, impartial resource addressing discrimination complaints, conflicts, communication breakdowns, and cultural issues. Key contributions during 2023/2024 include:

- **Conflict Resolution and Leadership Development:** The Ombudsman facilitated mediations and coached school and central leaders on conflict management best practices. This coaching directly engaged school leaders and community superintendents in mediations, emphasizing collaboration, support, and accountability.
- **Bias Awareness:** Recognizing biases as a root cause of conflicts, the Ombudsman was part of the district team that worked in partnership with StandUP to develop the district-wide equity professional learning series for rollout in 2024/2025.
- **Training and Development:** Over 40 training sessions focused on equity, bias awareness, culturally responsive leadership, and conflict transformation, fostering inclusive team cultures.
- **Data Tracking System:** To strengthen systemic responses, a data tracking system was developed to monitor trends and patterns in reported conflicts and complaints. This system supports targeted planning for future training and helps identify ongoing needs within the district, ensuring proactive and informed decision-making to address equity-related challenges.

EQUITY ACCOUNTABILITY COMMITTEE

The [December 19, 2024 presentation](#) to the Jeffco Board of Education provides an extensive overview of the Equity Accountability Committee.

The Equity Accountability Committee is fully engaged and invested in advising on district policies, procedures, and best practices to foster equity, inclusion, and

belonging throughout the district. Their work ensures that systemic changes align with the needs of our diverse community and support equitable opportunities for all students, staff, and families.

The Equity Accountability Committee (EAC) played a pivotal role in the development of the Inclusive Hiring Practices turnkey presentation. This resource is designed to train school and central based hiring managers on best practices for hiring, with the goal of strengthening efforts to recruit, retain, and promote a diverse and talented workforce within Jeffco. The EAC also has worked in partnership with our Talent Acquisition team to develop a set of standardized equity hiring questions to be used in all staff interviews moving forward. Collaborative subcommittees within EAC will further strengthen the efforts and impact of the committee, ensuring we remain on track to fulfill our commitments outlined in Article 22.

COMPLIANCE STATEMENT

On Track: District Policy Updates

Although this work was reported as “on track” last year, it significantly accelerated in 2024. Over the last year, #TeamJeffco prioritized policy updates specifically related to Board Ends 3.2 and 3.4. The overhaul of AC, GBA, JB, JB-R1, JB-R2, JB-R3, and JBB specifically reflect that effort. Although this work is identified as “completed” here, Jeffco recognizes that policy refinement is a continuing process, always adapting to changes in law and best practice.

On Track: Comprehensive Anti-Discrimination Complaint Process Implementation

Along with the updates to policy, the district also added a web-based complaint form, new staff, and an electronic database/tracking system to complete its new process for complaints of discrimination or harassment.

On Track: Differentiation of financial resources to align to student need

In addition to base level student-based allocations, schools receive additional funding for each at-risk student, either from the general fund or Title I. These additional resources enable differentiated supports to meet student needs.

On Track: Ensure every student in Jeffco has access to rigorous, grade level instruction

To close opportunity gaps in student learning, we continue to expand allocation of high quality instructional materials to ensure that every student has access to grade level instruction and opportunities to master Colorado Academic Standards.

On Track: Non-Discrimination Training

For the 24-25 school year, Jeffco updated its Title IX training to cover all forms of student non-discrimination. As of January 2025, approximately 96% of employees have completed this mandatory training which includes newly hired employees, many of whom are still working towards completion.

On Track: Equity Hiring Questions

The development of equity-focused hiring questions represents an important next step in ensuring intentional efforts to build a workforce that reflects the diverse demographics of our students in Jeffco. These questions set clear expectations that all employees are encouraged to demonstrate a growth mindset and a commitment to promoting equity and inclusivity in their roles, contributing to a culture where all students and staff feel safe, seen, and supported.

On Track: Equity Accountability Committee Collaborative Subcommittees

*Refer to the [December 19, 2024 presentation](#) to the Jeffco Board of Education for an overview of the Equity Accountability Committee Subcommittees.

The Equity Accountability Committee (EAC) continues to make significant progress through the work of its three dedicated subcommittees: Professional Learning and Equity Training, Family Engagement and Empowerment, and Classroom Staffing and Diversity.

- The Professional Learning Subcommittee is focused on designing and implementing equity-centered training for staff, aimed at fostering a culture of trust, belonging, and awareness of implicit biases.
- The Family Engagement and Empowerment Subcommittee has prioritized strategies to strengthen partnerships with families, ensuring their voices are central in decision-making processes and empowering them to support equitable outcomes for students.
- The Classroom Staffing and Diversity Subcommittee has made strides in supporting the development and promotion of the Inclusive Hiring Practices turnkey, while exploring innovative approaches to ensure diverse representation in classrooms across the district.

Challenge: Equity Professional Learning Rollout

As we prepare to roll out module one, “Understanding Implicit Bias,” of the equity professional learning series, a key challenge will be ensuring that every school and employee has the opportunity to engage in this critical learning. With competing demands for professional development time, successful implementation will require strategic coordination, collaboration, and strong partnerships with all employee groups. Balancing this priority with other timely and necessary training needs will be vital to achieving full, district-wide participation.

Challenge: Academic Freedom and Resource Coherence

*Refer to the [October 2024 Monitoring Report 1.3](#) for a closer look at the focused improvement areas for curriculum and resources.

At its core, ensuring the use of high-quality instructional materials is an equity issue, essential for closing achievement gaps and fostering consistency, coherence, and belonging in every classroom. While some teachers have expressed concerns about perceived limitations on academic freedom, the goal is not to undermine their expertise but to create a system that supports all students equitably.

Core curricular resources provide consistent, grade-level instruction, reduce learning gaps for mobile students, and allow teachers to focus on instructional delivery rather than material selection. They also ensure a research-based, transparent curriculum that connects learning logically across grade levels and supports all students in mastering standards.

Jeffco's data reveals a stark and predictable inequity in achievement along socioeconomic lines. To disrupt this pattern, we must embrace systemic changes that prioritize equitable access to high-quality resources and practices. Without intentional shifts in how we approach teaching and learning, we cannot expect different outcomes for our students.

Challenge: Hiring an Equity Ombudsman

Hiring an Equity Ombudsman has been a challenge. Currently, we are fortunate to have a skilled consultant serving effectively in this role, providing valuable support and leadership. While we remain committed to filling this position in a more permanent and ongoing capacity, identifying the right leader with the unique and specialized skill set required has proven difficult in the past. Finding the ideal candidate will be critical to ensuring the long-term success and impact of this role within Jeffco.

Challenge: Training Compliance

Due to time constraints and ease of access to workplace technology, some employees have experienced challenges in completing the mandatory training in a timely manner. Human Resources continues to monitor completion and communicates with supervisors to ensure employees are provided time, access, and any support necessary to meet this expectation.

APPENDIX

Key Definitions

Student-Based Budgeting:

A student-based budget allocation to a school is a method of distributing budgetary resources, aligned to the number of students served and the specific attributes and/or needs of the students. This approach recognizes that it takes more staff and materials to serve more students and generally fewer staff and materials to serve fewer students. Formulas are adjusted and calibrated to ensure that small schools have what they need in comparison to larger schools that have greater efficiencies of scale.

At-Risk Supplemental Allocation:

Jeffco's student-based budgeting (SBB) formula has always included a supplemental amount of funding that goes to schools along with every free and reduced lunch (FRL) eligible student. This supplemental funding reaches every FRL student in the district.

Title I Supplemental Funding:

Jeffco has traditionally allocated a portion of its Title I funding through a formula to a set of schools with higher concentrations of poverty. These supplemental funds are available as a pass through federal grant and are on top of the district's at-risk supplemental funding.