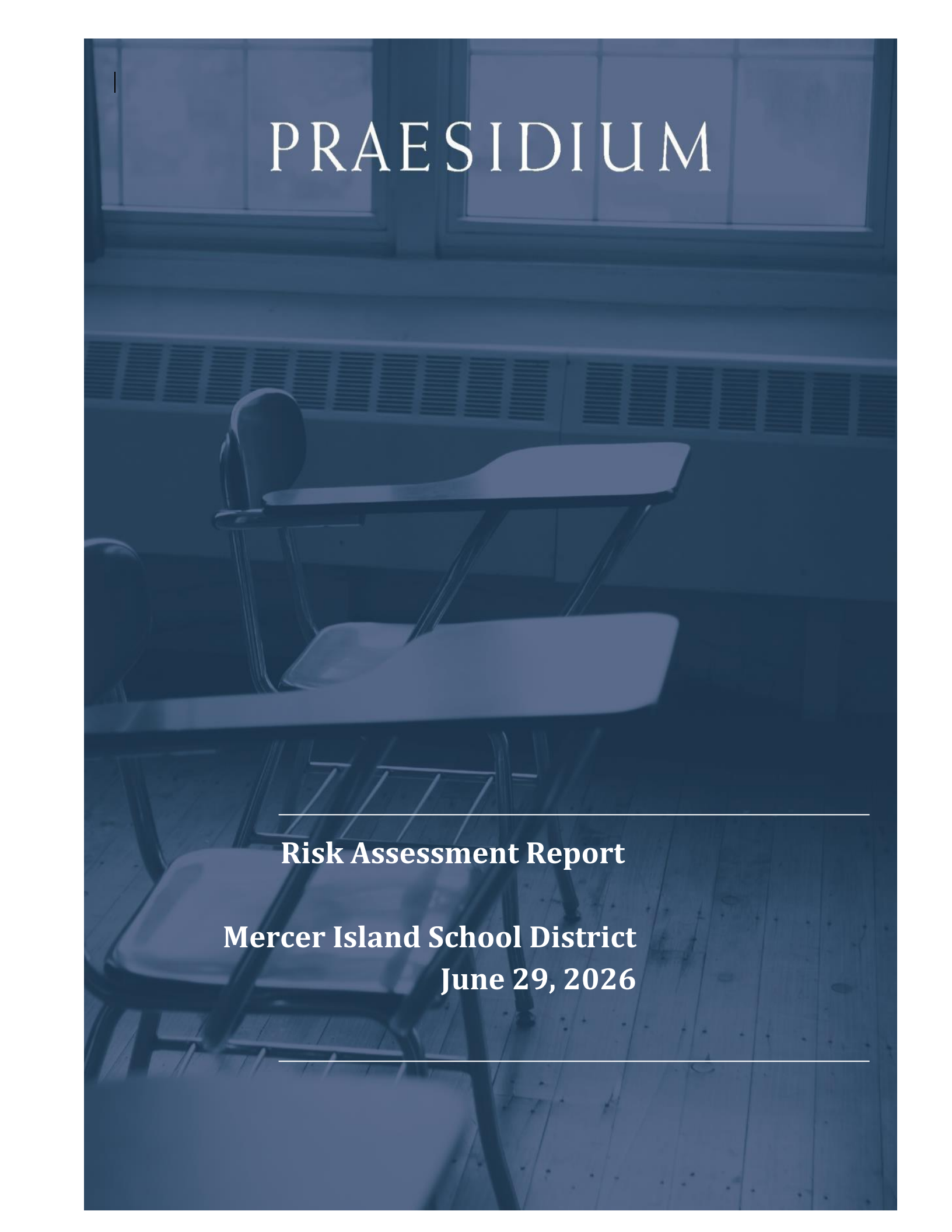




PRAESIDIUM

Risk Assessment Report

**Mercer Island School District
June 29, 2026**

Indemnity Statement

Praesidium provides a Risk Assessment to assist in the prevention of organizational abuse. However, it must be noted that no system can guarantee prevention of abuse. This information is not legal advice, either expressed or implied. Consultation with qualified legal counsel is recommended.

When all recommendations are implemented and maintained, a risk for abuse continues to exist, as the problem of abuse is pervasive and no system to date can assure complete safety.

Accordingly, **PRAESIDIUM MAKES NO WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND MERCHANTABILITY, REGARDING THE SUCCESS OR FAILURE OF THE PRAESIDIUM RISK ASSESSMENT™ IN PREVENTING OR REDUCING THE INCIDENCE OF ABUSE.**

Introduction

Praesidium was recently retained by Mercer Island School District to conduct a Risk Assessment of its campuses and programs. The review assessed the physical environment of all six campuses as well as policies/procedures regarding youth protection and abuse prevention. This report presents the results of the policy review, site visit, and MISD staff, parent, and student interviews conducted between January 8 and April 30, 2026.

Mercer Island is an island community located at the southern end of Lake Washington. The Mercer Island School District has a K-12 student population of approximately 4,000 and a teaching and support staff of 500. Their mission is to “foster learning by engaging students in thinking critically, solving problems creatively, and working collaboratively.”

Campuses visited and reviewed for this Risk Assessment include Lake Ridge Elementary, West Mercer Elementary, Island Park Elementary, Northwood Elementary, Islander Middle School, and Mercer Island High School, including CREST campus. Additional meetings were conducted in the District Office.

As part of this review, Praesidium reviewed the following documents:

- StudentAthleticEligibilityHandbook2025-2026
- 2025.10.17 MIHS Athletics Parent Communication and Participation Guide
- _MIHS Coaches Education Meeting 2025-2026
- 2025_26 IP_ Ultimate Guide to Island Park Elementary
- West Mercer Family Handbook 2025-2026
- NW Parent Student Handbook
- 2025-26 Parent Handbook (Lakeridge)
- IMS Rules & Handbook
- MIHS Student Handbook 2025-26
- 2025.10.15 Volunteer Handbook 2025-26.docx and Volunteer Webpage
- 3207F Incident Reporting Form
- Policy 5010: Nondiscrimination and Affirmative Action & Procedure
- Policy 5000: Recruitment and Selection of Staff
- Policy 5005: Employment: Disclosures, Certification Requirements, Assurances and Approval
- Policy 5001: Employment of Retired School Employees
- Policy 5004: Employment: Disclosures, Certification Requirements, Assurances and Approval
- Policy 5610: Substitute Employment & Procedure
- Policy 5631: Background Checks for Volunteers and Individuals Under Contracted Services & Procedure
- Policy 5641: Student Teachers
- Policy 5280: Separation from Employment

- Policy 5281: Disciplinary Action & Discharge
- Policy 5201: Drug-Free Schools, Community and Workplace
- Policy 5202: Drug and Alcohol Testing Policy for Employees in Positions Requiring a Commercial Driver's License
- Policy 5006: Harassment-Free Environment and Prohibition of Discrimination of or by Employees
- Policy 5011: Sexual Harassment & Procedure
- Policy 5232: Certificated Staff Presence at Buildings
- Policy 5253: Maintaining Professional Staff/Student Boundaries & Procedure
- Policy 5251: Conflicts of Interest
- Policy 3205, Sexual Harassment of Students Prohibited, and Procedure
- Policy 3207, Prohibition of Harassment, Hazing, Intimidation and Bullying, and Procedure
- Policy 3210, Nondiscrimination of Students, and Procedure
- Harassment Page
- Policy 3211, Gender Inclusive Schools, and Procedure
- Policy 6605, Student Safety Walking, Biking & Riding Buses to School, and Procedure
- Policy 6625, Private Vehicle Transportation, and Procedure, Form 1 (Adult Driver Private Vehicle)
- Policy 6601, Passenger Conduct on School Buses
- Policy 6625 F2, Student Driver Private Vehicle
- Policy 2321 F4, Guidelines for Volunteer Chaperones and Acknowledgment Form
- Policy 4200, Safe & Orderly Learning Environment (Visitors), and Procedure
- Policy 3241, Student Discipline Procedures, and 3241P
- Policy 2320 F, Secondary Student Trip-Behavior Agreement
- Policy 2330 F3.1, Elementary Student Trip-Behavior Agreement
- Policy 2321, Extended and International Field Trips, Athletic Trips, and Outdoor Education, Procedure
- Policy 2320, Day Field Trips, Athletic Trips, and Outdoor Education, and Procedure
- Policy 2321 F3, Student Trip-Behavior Agreement
- Policy 2321 F1, Day Field Trip Application
- Policy 2022, Electronic Resources and Internet Safety, and Procedure
- Policy 4260, Community Use of School Facilities, and Procedure
- Policy 3421, Electronic Resources and Internet Safety Procedure, and Procedure & Form
- Contents of the Student Safety and Wellbeing Committee Google Drive, and all subfolders

Between April 28-April 30, Praesidium conducted the follow in-person interviews – all were conducted as panel interviews/group discussions.

- Six interviews with building administrators
- Three interviews with staff
- Two interviews with counselors/security
- Teaching/Learning and Business Teams
- Members of the PTSA
- Members of the Student Safety and Wellbeing Committee
- Athletics/Activities and Boosters
- Three interviews with parents
- Two interviews with students

In addition, two training sessions were provided for faculty and staff of the elementary and middle schools.

Praesidium analyzed the existence of abuse risk management systems in the eight operational areas of The Praesidium Safety Equation™



The findings and recommendations in this report are presented within this framework. Please note that while this project's scope did include onsite visits to all six campuses, observations were limited to assessing the physical environment and not sufficient to verify the implementation of all existing policies and practices related to Monitoring and Supervision.

Policies

Clear and comprehensive policies define the bandwidth of acceptable behavior in an organization, guide staff conduct and play a significant role in abuse risk management. Organizations should develop policies that send a clear message to applicants, current staff, volunteers, and third parties with access to youth of the organization's commitment to the protection of everyone.

Findings:

District Policies

Policy information is shared with staff electronically annually, as well as through a policy refresher with all staff at the beginning of the school year. Some staff members report that policy implementation is different at every campus, and it can be difficult to locate policies. Interviews and policy review dates indicate that many policies are not regularly reviewed and updated.

Policy 5253 and 5253P on Maintaining Professional Staff/Student Boundaries provides examples of inappropriate behaviors and expectations for appropriate behavior and student rights. However, students report that they do not feel policies are clear and want more information on student rights.

This and other policies address requirements for mandated reporting, but do not include any contact information for agencies to make a report.

Pre-existing relationships with students and families are also mentioned, and employees are encouraged to discuss them with their building administrator or supervisor. Interviews indicated that several years ago, staff were supposed to disclose pre-existing relationships, but were unclear if that was still expected, indicating it no longer takes place in practice.

Administrators report that they share reminders for staff not to “friend” students or parents on social media; refrain from communicating with families via personal cell or texts; not to be alone with students or keep the door open; and be mindful of protecting themselves and children. However, students indicated that it was common for students and teachers to follow each other on social media. There is a policy prohibiting phone and smart watch use in school.

There are comprehensive policies on student transportation in personal vehicles, but some staff report being unsure what the expectation is currently. There are also policies detailing communication expectations with students and parents/guardians, but some staff report still being confused and receiving mixed messaging as technology evolves.

Policy 3205 and 3205P on Sexual Harassment of Students provide detailed information on the process for responding to an allegation of sexual harassment, even

if the harassment takes place off campus.

Policy 5251 on Conflicts of Interest states that “No District employee will engage in or have a direct financial interest in any activity which conflicts with the employee’s duties, responsibilities, and/or ability to act objectively in matters affecting the District. Further, no District employee may employ or use any person, money, or school property under the employee’s official supervision, control, or direction for the private gain of that employee or another” and that written permission is required from the Superintendent or principal to do so. Additionally, the MISH annual coaches training states that district and volunteer coaches only connection to students is through the district as an employee; therefore, connecting with them under other circumstances could be misinterpreted.

However, interviews indicated this is not the case in practice, with frequent overlap between school-sponsored and community-sponsored sports organizations, as well as district employees or volunteers also acting as paid private coaches outside their role with the school. Policies 5253 and 5253P requests that pre-existing relationships with a students should be reported to supervisors and/or school administrators. Interviews also consistently indicated that this policy is not followed in practice. It is well known that some staff members operate their own personal businesses as tutors, instructors, consultants, etc. on campus, not all of whom have obtained written permission.

Some staff interviewees also indicated confusion about policy specifics and requested additional guidance. Parents reported significant crossover with private tutoring, as well as electronic communication between staff and students/parents, and many ways in which lines are blurred.

The gifting policy states that repeat gifts and gifts from families to staff over \$500 should be declined.

None of the policies have guidelines for the number of youth per bed during overnight trips. Interviews indicated it can range from 1-2 students per bed depending on the event (field trips, international trips, athletic events, etc.).

MISD High School Athletics policies include limited information on maintaining appropriate boundaries for athletic coaches and student athletes. Some interviews indicated there is no policy stating that athletic coaches cannot text with student athletes, and the MISH athletic handbook and parent communication materials do not state this explicitly. However, district policies and the annual coaches education meeting does address refraining from texting 1:1 with student athletes. Other interviews indicated that athletic coaches were generally aware of this expectation, but parents are not, and that it sometimes happens anyway.

Handbooks and Code of Conduct

Each campus has its own student and parent handbook. While differences are necessary to address the differences in programs, contact information, schedules, pickup and drop-off procedures, etc., there are some key elements that are not consistent across the handbooks:

- Naming convention. On the website the handbooks are all labeled for students, which may cause parents to think their information can be found in a separate document
- Title I parent and family engagement expectations
- Contact information and links for key individuals and offices/services
 - Different information for the Disability Discrimination contact person, unclear if this is due to different contact persons for different schools, or outdated information
- Detailed information on student behavior and discipline including the Elementary Response to Behavior table for all elementary schools
- Detailed information on Counseling Services and differing names for the ELD
- Accessibility in communications in compliance with the ADA is only included in the MIHS handbook

Families sign the Code of Conduct for the district as part of the forms for the beginning of the school year. Every elementary classroom also comes up with its own conduct guidelines.

Praesidium Recommendations:

1. Suggest updating and expanding Policy 5253 to include:
 - a. Zero tolerance for abuse statement. This sends a clear message that MISD places student safety as a top priority, can deter someone with intentions to cause harm, and raises the level of awareness of everyone who reads the document. *See sample language in Appendix A, Policies on page 1.*
 - b. Suggest revising some examples of inappropriate behaviors and expectations for appropriate behavior. These include:
 - Adding that staff must ask for and obtain student consent before any type of developmentally appropriate physical contact with a student that is reasonably necessary for instructional purposes, (e.g., an athletic coach asking for permission before guiding a student swinging a baseball bat or golf club).
 - Change the statement about favorably commenting on a student's appearance to not commenting, even favorably, about a student's physical appearance, unless it is an issue of their clothing being inappropriate for the school environment.
 - As part of the Appearances of Impropriety, specify that being alone with an individual student in a location that is not reasonably observable or interruptible by others includes classrooms, offices, and rehearsal spaces.
 - c. Include Washington state mandated reporting requirements and contact information in the policy, as well as all parent/student, employee, and

- volunteer handbooks. Additionally, consider including the procedure portion of Policy 5253 in all handbooks, similar to the HIB policy.
- d. Consider requiring that pre-existing relationships between employees and students and families be formally documented, not just discussed with the building administrator or supervisor. *See sample language in Appendix A, Policies on pages 1-3.*
2. Consider including policy 3205 in all student/parent, volunteer, and athletic handbooks as well.
 3. Review student-parent handbooks to address inconsistencies noted in the findings above. Additionally, recommend addressing the following for IMS and MIHS:
 - a. IMS does not include:
 - Mission, vision, values
 - Parent information about ways to stay connected with the school, parent orientation, activities, and ways to get involved
 - Times students are not allowed to arrive early
 - Full information on volunteering and links to additional information
 - Community resources
 - b. MIHS recommendations:
 - Communication guidelines – also include expectations for appropriate communication between students and teachers (see examples of appropriate verbal communications)
 - Add links to websites and resources mentioned
 - Consider including how counselors are assigned to students by last name to minimize confusion
 - Consider removing the option for open periods allowing students to be alone with a teacher, if the teacher has a free period – unless it specifies group meetings only and no 1:1 meetings unless in the public spaces listed (not a teacher’s classroom or office unless it is easily visible from the outside)
 - Make visitor policy consistent with other schools, that visitors must check in at the front office with their identification AND receive and wear a badge while on campus
 4. Expand on and enforce existing formal written policies for school campuses and athletics that define appropriate and inappropriate physical and verbal interaction and boundaries between employees, volunteers, and students, as well as guidelines for one-on-one interactions in-person and online. Regularly communicating these policies in writing and verbally to all employees helps staff understand how to have warm and caring interactions with a student, while maintaining important boundaries. These should include, but not be limited to, policies defining:

- a. Appropriate and inappropriate physical and verbal interactions
 - b. Acceptable interactions with students outside of regularly scheduled program activities, including but not limited to tutoring, babysitting, and contact after program participation has ended
 - c. Consistently enforce existing policies about the use of electronic communication (such as cell phones, text messages, emails, and social networking sites) with students
 - d. *See sample language in Appendix A, Policies on pages 1-3.* Some policies provided in .doc or .pdf format have been returned with comments providing specific recommendations to those documents
5. Enhance Student and Parent handbooks to include comprehensive Codes of Conduct for students. Current handbooks rely primarily on “making good choices”, but what constitutes a “good choice” can vary considerably from person to person and may be impacted by backgrounds, experiences, cultural expectations, etc. It is important to provide more specificity and context to help students and families understand expectations, and to allow the schools and district to better enforce those expectations. *See sample language in Appendix A, pages 10-13.*
6. Initiate enforcement of Policy 5251 on Conflict of Interest and require all employees operating personal businesses on campus to obtain written permission, and treat those as a third-party vendor or renter, and require that they provide their own insurance and sign a Hold Harmless form. To more effectively minimize potential conflicts of interest, consider prohibiting district employees from operating personal businesses with students on campus that conflict with their role.
7. Revise the MISH athletic handbook and parent communications materials to include the policy against individual texting between athletic coaches and student athletes and include approved communication methods.
8. Consider adding language to the gift-giving policy that gifts from staff to students must be distributed equally and not to single out one student or subgroup of students. Additionally, consider lowering the gift limit that athletic coaches and employees may accept (currently \$500). *See sample language in Appendix A, Policies on page 4.*
9. In addition to having staff sign that they have reviewed MISD’s Employee Handbook, consider communicating MISD’s policies verbally with staff. This could be done as part of staff in-service days, new employee orientation, and in staff/departamental meetings, etc. Sharing the policies in writing and verbally provides staff with a clear understanding of MISD’s policies and procedures.

10. Review policies with faculty and staff regarding their obligation to cooperate with investigations, including expectations for speaking with authorities and how to obtain support from leadership and administration.
11. If not in place already, require all staff, volunteers, and students/parents to sign receipt and acknowledgement of handbooks annually. *See sample language in Appendix A, Policies on page 5.*

Screening and Selection

The first thing an organization can do to keep its programs safe is carefully screen everyone who has access to youth. Offenders look for employment or volunteer positions where they have access to vulnerable populations. Specific screening and selection procedures can prevent a potentially harmful applicant from gaining access to youth or vulnerable adults.

Findings:

Policy 5000 on the Recruitment and Selection of Staff has not been updated since 2015. Specific information on screening criteria, behaviorally based interview questions, and response rating scale are not included. The minimum number of references is not specified, though administrators indicate that three references are typically done. Sample behaviorally based interview questions were not included in the policy.

The district requires applicants to allow MISD to contact previous school employers regarding prior acts of sexual misconduct. Additionally, prior to employment, applicants are required to disclose crimes against persons, including sexual assault, exploitation, or physical abuse of a minor.

According to the policy, employees and high access volunteers are required to complete a Washington state criminal identification check annually and are fingerprinted every two years. However, background checks and fingerprinting are not being re-run; interviews indicated there are staff who have been in the district for 20+ years without additional screening. Teacher unions do not currently allow additional screening for employees and are negotiating against repeat screenings.

Staff and volunteers without unsupervised access to children will undergo a name and birth date background check with the Washington State Patrol. Rescreening is required annually with fingerprinting done every two years. However, some parents report that the volunteer process has not been redone after initial signup. Parent volunteers also sign in when arriving on campus and complete the Raptor ID scan. As with employees, volunteers are not supposed to be 1:1 with students, but parents report that does happen.

Volunteer athletic coaches must complete WIAA Coaches School & requirements, fingerprinting, Vector training, and volunteer paperwork before working with student athletes. Some interviews indicated that while fingerprint screening was always completed (and must be redone every 2 years), ensuring Vector training completion has not been consistent. Interviews indicated that if an athletic coach needed to be put on leave during the season, it would be extremely challenging to receive support to do so, and would be more accepted at the end of the season –

unless it is someone who is a beloved member of the community and then there would be significant pushback regardless of the time of year.

Some staff interviews indicated that as a school community, they sometimes have too much trust in someone once they go through the screening process.

Praesidium Recommendations:

1. Update Policy 5000 to include:
 - a. Specific information on screening criteria
 - b. Links to behaviorally based interview questions for applicants and references
 - c. Response rating scale
 - d. Specify requirement for 3 references (2 professional, 1 personal)
 - e. Establish a centralized file location for all applicant materials and include it in the policy
 - f. *See attached resources in Appendix B, Screening and Selection, on pages 10-31.*
2. Require all applicants to complete a standardized application before hire that includes the MISD employee Code of Conduct and zero-tolerance policy for abuse. This allows MISD to gather information about their qualifications, assess their level of risk to abuse, clearly communicate that MISD has zero tolerance for abuse, and may encourage applicants who pose a risk to students to self-select out of the application process. *A sample application is provided in Appendix B, Screening and Selection on pages 1-9.*
3. Whenever feasible, utilize behaviorally based interview questions that can raise potential red flags for applicants to high access volunteer/contractor positions. These types of questions are designed for applicants to discuss their previous behaviors and responses to certain types of situations, which may help indicate future behavior. Additionally, having a set of questions that leadership can refer to creates institutional memory for future leaders to use in the screening process. *Sample behaviorally based interview questions and high-risk screening indicators are provided in Appendix B, Screening and Selection on pages 10-21.*
4. Ensure all volunteer and district coaches consistently complete training requirements. Utilize a tracking mechanism and establish a person/role responsible for tracking and enforcing compliance.
5. Repeat criminal background checks on all continuously employed staff once every two years, or more frequently if required by state or program-specific regulations. Periodically repeating criminal background checks helps ensure that MISD's employee information is current and limits the ability of those who present a risk to have access to students.

Training

Having staff well-trained in abuse prevention is essential for creating a safe environment. The more staff know, the more comfortable they will feel reporting any concerns. In addition, well-trained staff are better able to avoid placing themselves or their program or services in compromising situations. Abuse risk management training sends a powerful message to everyone. It tells student members and parents, *"We care enough about your well-being and safety to require training for all staff."* It tells potential abusers, *"Abuse will not go undetected."*

Findings:

Policy 5253P states that all new Staff Members will receive training on appropriate staff/student boundaries within the first three months of employment. New staff members are assigned a mentor when they start. The first three years of employment require a combination of formal and informal observations/evaluations, and staff are required to reapply annually. High school students indicated they would like to see more informal staff observations; their perception is that if they see an administrator, then something is wrong. Interviews indicated that staff hired during the school year may not receive the same robust training as pre-schoolyear new hires, and that they attend the two-day orientation at the start of the following year.

Principals receive annual training on policies and procedures that they can then deliver to staff. The staff policy refresher is at the beginning of each school year, along with district mandates and expectations. Additionally, staff are required to complete Vector online training modules that include sexual abuse and other safety related issues. Interviews indicate that there is some pushback from teachers about completing these trainings and maintaining the expected boundaries, primarily due to preexisting relationships in the community. Some staff indicated they want more in-depth training opportunities, while others indicated they would not like to dedicate additional time.

Staff interviews indicated that campuses no longer do professional development together throughout the school year, rather they are offered separately by campus. Interviews indicated these do not often include boundaries and mandated reporting training, but do include some prevention elements. There is a Professional Learning Community that meets every other week to work on projects/processes together and discusses students and supports that are needed. Additionally, this school year, there were weekly meetings with paraprofessionals about outside supervision and children who need additional supervision.

The Island Park Elementary Handbook states that "All volunteers at MISD elementary schools are required to watch a training video and complete paperwork on the school website. However, there is no training video available via the link

provided, and staff interviews indicated that training is not required for parent volunteers. Additionally, some parents who chaperone field trips or volunteer in the classroom do not feel they were given much education on what is considered appropriate. Handbooks and parent interviews stated that the elementary schools host "parent recess" that provides rules and expectations.

The annual Coaches Education meeting includes a presentation for volunteer and district coaches that gives an overview of Child Abuse and Neglect (Policy 3421), mentions being inclusive for youth with disabilities, and that the district seeks to be a Gender Inclusive School (Policy 3211). The Gender Identity section includes a link to WIAA Gender Diverse Youth Inclusivity Toolkit, however the link is either broken or does not work for outside users.

The presentation and policy also include social media best practices.

Following recent incidents, interviews with high school staff indicate they would like more training and discussion on boundaries and abuse prevention.

Praesidium Recommendations:

1. All new Staff Members should receive training on appropriate staff/student boundaries **before** they have access to students.
2. Ensure abuse prevention training to identify red-flag behaviors and boundary violations is conducted for all employees and high access volunteers at least annually. Provide regular micro-learning opportunities through staff/departmental meetings, supervisor and employee check-ins, in-service days, etc. Consider seeking opportunities for in-person or live virtual training to increase opportunities for faculty and staff engagement and knowledge retention. Proper training helps faculty and staff create and maintain a safe environment for students. This may include:
 - MISD policies related to preventing abuse;
 - How to maintain appropriate boundaries with students;
 - How to recognize and respond to inappropriate behaviors and policy violations;
 - MISD policies and procedures for reporting and responding to red-flag behaviors, policy violations, abuse allegations, and incidents of abuse;
 - How to protect themselves from false allegations;
 - How abuse occurs in organizations (Access, Privacy, Control); and
 - How offenders operate.
 - *See Sample Policy in Appendix C, Training on pages 1-4.*
3. Increase training for administrators on abuse prevention topics and procedures on how to respond to concerns or incidents of abuse. Administrator training should be provided to individuals who initially enter a supervisory position upon hire and those internally promoted into a supervisory position. Consider seeking opportunities for in-person or live virtual trainings to increase the opportunity

for administrator engagement and knowledge retention. Administrator training topics should include:

- Overview of supervisor's role in abuse prevention;
 - Supervision strategies that can reduce risk, such as increased presence and observation of programs and locations;
 - Providing teaching moments in supervision;
 - Providing corrective feedback;
 - Creating and maintaining a culture for reporting and responding;
 - Steps for how to respond when employees, volunteers, or third-party contractors report suspicious or inappropriate behaviors, boundary or policy violations, or allegations of abuse;
 - Conducting internal investigations in collaboration with external authorities;
 - Responding with a trauma-informed lens to a student (and their family) who experienced an alleged violation or abuse;
 - How to recognize red flag behaviors between adults and students;
 - How to recognize red flag behaviors between students;
 - How to monitor and supervise students to reduce opportunities for inappropriate behaviors; and
 - How to respond to red flags and allegations of abuse.
 - *See Sample Policy in Appendix C, Training on pages 1-4.*
4. Review high-risk activities as part of training to prepare for events, including:
 - Transportation
 - Bathrooms
 - Overnight field trips, including 3rd and 5th Grade Camps, international trips, etc.
 5. Verify that all volunteers have received key teaching points prior to access to students and that they are able to access the volunteer training video via the link provided. If not in place consistently across campuses, consider offering a "parent recess" to provide rules and expectations to parent volunteers. Training topics should include:
 - Appropriate and inappropriate boundaries between adults and students
 - How to recognize red flag behaviors between adults and students
 - How to recognize red flag behaviors between students
 - How to monitor and supervise student members
 - How to respond to red flags and allegations of abuse

Monitoring and Supervision

Monitoring serves as a critical component in protecting youth, employees, volunteers, and the organization. When employees are monitored, potential abusers are less likely to act on their impulses because they face detection. Similarly, when youth are monitored, they are less likely to engage in behaviors that may result in problematic sexual behaviors or abuse between youth. Additionally, allegations of any impropriety or wrongful act are more easily and accurately investigated and resolved. Effective monitoring can be facilitated in five ways: 1) by the frequent or continual presence of other employees of youth, 2) by written monitoring requirements, 3) by easy identification of employees and volunteers, 4) by an open architectural setting, and 5) by organizational policies that prescribe how employees should behave in high-risk situations and youth behavioral expectations.

Findings:

Policy 5232 on Certificated Staff Presence at Buildings requires elementary and middle school certificated staff to be present 30 minutes before and after the school day, and high school certificated staff to be present 15 minutes before and after the school day. From interviews with administrators and staff and reviewing parent and student handbooks, it is unclear if this is the case in practice. Staff members indicate that students are often dropped off well before school starts, despite district policies that require students arriving early to be supervised by parents.

Policy 3241P on Student Discipline Procedures District states that staff members are responsible for supervising students during the school day and during school activities. There are no other district written policies on processes for monitoring and supervision of students during transition times or in hallways, bathrooms, locker rooms, playgrounds, etc. Additionally, interviews indicated that staff are not monitoring during transition periods, in hallways or bathrooms/locker rooms during the school day in accordance with labor union guidelines.

All campuses are open, and members of the community will frequently walk through campus, despite signage and requests to the community not to do so.

Some of the elementary playgrounds are very large and difficult to supervise and report a ratio as high as 50:1 on the playground. Cameras are present in public spaces like hallways and arrival/dismissal areas. Footage can be reviewed if there is an incident, but are not actively monitored and thus cannot replace line of sight monitoring.

Policy 2321 Guidelines for Volunteer Chaperones indicates that students on field trips should always use a buddy system and stay in groups of two or more. However, best practice for reducing risk of problematic sexual behaviors between youth is that students should not be in groups of two without adult supervision.

Overnight camp for 5th grade heavily involves parent chaperones supervising youth

overnight. The cabins have a main bunkroom with an open door to the chaperones in a separate space. Last year, interviews indicated there was no chaperone meeting, but they were asked to watch a video. Administrators found this to be a significant challenge with how parent volunteers handled issues that arose at camp. The 3rd grade camp hosted a meeting, but not all were able to attend and received a packet of information. However, interviews consistently indicated that boundaries at camps are clearer than the day-to-day at schools, particularly maintaining the rule of three.

After school programs are usually run by teachers, parent volunteers, or third-party contractors. The clubs often meet in different classrooms, and some staff questioned if it would be possible to have them meet in more open centralized spaces, since there are relatively few employees on campus after school.

Islander Middle School started using the Flex App this year to scan students in and out if they need to leave the room during class. A pass is also required when they are in the hall. The school is still adjusting to using this new system.

Athletic events provide district transport to and from events and include the bus driver and at least one coach. Student athletes are permitted to return home with a parent instead, and check out with coach before leaving, however there is no formal documentation requirement. A ratio of coaches to student athletes is maintained for trips, and co-ed trips require mixed gender chaperones. Rooming for overnight trips is decided per team, and may have 1-2 students per bed. Staff are not permitted in locker rooms. Weigh-ins are always done in front of adults and other students, and clothing is not removed.

Teachers have classrooms and offices that can be difficult to observe from the outside, particularly at the high school. The high school offers an open campus and has free periods; sophomores, juniors, and seniors are permitted to freely roam or leave campus.

Praesidium Recommendations:

1. Ensure that all areas that are off-limits (such as storage sheds and closets, and unused spaces) remain locked or always blocked from student access. Particular areas of concern include stairwells, large outdoor spaces, and meeting spaces that should be blocked and have posted signage indicating that students are not permitted access or that 1:1 gathering is not allowed. Meeting spaces where students are allowed to gather during the day should keep blinds open and lights on at all times (excepting lockdown drills/procedures) to ensure private gatherings are not taking place.
 - a. Create and implement a plan for each campus to regularly monitor low traffic areas on a varied timetable to ensure students do not have access to unsupervised locations (for example, unused or isolated classrooms, bathrooms, sheds, lofts, etc.). Guidance on facility monitoring should be specific to each campus.
 - b. Include a checklist that is reviewed by an assigned supervisor on a weekly

- basis.
- c. The checklist should include notes on private spaces that are found to be accessible to students to determine if there is a pattern of being left unlocked or unsupervised.
 - d. *See sample procedures and checklist in Appendix D, Monitoring and Supervision on pages 1-5 and 9-10.*
 - e. Include who is responsible for implementing changes and how those changes will be communicated to all staff at the respective campuses.
2. Establish procedures for when one-on-one interactions are unavoidable. These include:
- a. Meet students in public spaces or high traffic areas, do not use classrooms or offices before or after school when there are relatively few people on campus, or during the school day if the classroom/office cannot be easily observed from the outside
 - b. If privacy is essential to the interaction, such as a counseling or disciplinary meeting, keep door cracked or window blinds open to classrooms and offices to increase visibility
 - c. Avoid physical interactions
 - d. Notify other employees and/or supervisors and encourage them to randomly drop in or pass by the interaction
 - e. Document and immediately report any unusual incidents including physical interactions, disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.
 - f. Share schedule and/or case notes with supervisor
3. Establish written monitoring and supervision procedures while off-site. This includes day and overnight trips, 5th grade camp, and international trips. Off-site programs may offer new challenges for supervising students. These procedures should include:
- a. Guidance to staff on how procedures differ if a parent is present or not;
 - b. Transportation monitoring and supervision procedures;
 - c. How to maintain appropriate supervision ratios; and
 - d. MISD policies for student sleeping arrangements and room assignments.
 - e. *See sample procedures in Appendix D, Monitoring and Supervision on pages 6-8.*
4. Include language in the field trip transportation policy that instructs employees and chaperones on monitoring this high-risk activity including:
- a. Ensuring an adult other than the driver is monitoring the students throughout the duration of the transport.
 - b. Monitoring adults should be spaced throughout the transport to maximize supervision. If possible, adults should not share seats with students.
 - c. Employees must have a list of the students on the trip. A designated supervisor should take attendance every time students board and leave the bus, and periodically throughout the trip. If the trip is an away sporting

event and the student will be riding home with a parent or pre-approved designee, this should be documented as well.

5. Consider adding age specific guidelines to the bathroom policies for younger and older students, including:
 - b. How to assist a student who has an accident to allow for the most privacy possible, where to document when assistance has been given, and who receives that information (a supervisor and parent);
 - c. How to manage interactions between younger and older students during bathroom breaks;
 - d. How to conduct bathroom breaks for older children and teens, such as only allowing as many students in the restroom as there are stalls, whenever possible.
 - e. Practicing supervision by being within hearing distance of group bathroom breaks.
 - f. Special considerations for bathroom breaks off-site, such as a teacher entering a bathroom and checking stalls before allowing children to enter.
 - g. *See sample policy language in Appendix D, Monitoring and Supervision page 8.*
6. Suggest changing Policy 2321 Guidelines for Volunteer Chaperones to:
 - a. Require Rule of Three for students, rather than a group of two or “buddy system.”
 - b. Include electronic communication expectations, i.e., what methods chaperones are permitted to use to contact students. If texting is permitted, specify that 1:1 texts are not permitted and must include groups of students
 - c. If a chaperone’s spouse or partner is granted permission to attend, they must also complete the entire volunteer application process including background checks
 - d. Insert clickable links into all policies/webpages referenced in the document
 - e. Ensure these rules and expectations are shared with students attending the trip and their parents/guardians

Internal Feedback Systems

This operation reviews the types of data collected that can be used to identify high-risk activities or individuals, and the climate for reporting suspicious or inappropriate behaviors, policy violations, or allegations of abuse. Data (including incident reports, survey results, turnover data, student member or parent complaints, and staff grievances) can provide valuable information for a wide variety of considerations, such as the identification of programs that may require additional monitoring or staff who may require additional supervision or training. It may also alert decision-makers to changes that must be made to reduce potential exposure. Data from programs and trends over time may show where additional risk management efforts are necessary.

Findings:

Anonymous reporting is offered via the See Something, Say Something website and app. Interviews indicate that while most staff and students are familiar with it, many parents are unaware. Some students indicated they think the app is rather a “joke,” and some suggested that perhaps if students understood why the app was available to them in the first place (reportedly in response to a student passing away due to suicide), then they might take it more seriously.

There is a district-wide building leadership team with nine representatives from across the schools, and each campus also has its own building leadership team to whom staff can report concerns. Security teams also meet weekly to address concerns.

The district conducts an annual staff survey to obtain feedback on staff training needs. Athletics conduct staff evaluations and anonymous student and parent surveys.

Staff fill out a SOAR form for behavior incidents or when they need support. The front office then enters it into a database to identify trends. The positive behavior support team reviews the data and may use it to reteach.

Staff indicated that the incident reporting form and centralized documentation system is new, and there has been mixed messaging around who to include. However, interviews indicated Parent Square has been helpful.

There is a Behavior Tracker Google form filled out by any staff directly observing or involved in student-to-student behavior issues. There is a Minor Vs. Major Behavior document as well to ensure minor behavioral concerns are also followed up on and communicated with families. Administrators indicated that sometimes teachers will handle behavioral issues in their own classrooms and often inform parents when a behavior issue occurs, but administrators are not always informed at the time.

Interviews indicated a desire for the behavior documentation forms to result in consistent meetings between students and school counselors. This would be

particularly beneficial for students targeted by behavioral issues, but is not yet occurring.

Other staff members report that documentation is still not centralized and that record keeping depends on who the current principal is; for example, it may be just hard copies in a file that cannot be accessed after that person leaves. Some staff said that historically they have been instructed not to document because some members of the community are very litigious. Other staff reported that prior reports of grooming behaviors and policy violations were ignored and not documented, causing them to lose faith and trust in reporting.

Many interviews with staff and students indicated that follow-up rarely happens after a report is received, which contributes to concerns of inaction. Counselors generally do not know what happens after a disciplinary or HIB concern is reported to administration, and they may be unaware of no contact orders between students. There is no process in place for involving counselors to assist with the targeted student in a HIB incident. An interviewee suggested utilizing a password protected incident outcome sheet for counselors to assist them in offering support and helping understand the whole picture of the student.

Praesidium Recommendations:

1. Establish and reinforce grievance procedures for staff, students, and parents/guardians. They should be encouraged to report concerns, and the feedback can alert leadership of potential issues. Communicate these procedures in writing and verbally to ensure everyone knows how to internally report suspicious or inappropriate behavior. Include the following:
 - a. Provide examples of behaviors or concerns MISD would like to know about regarding employee or student behavior
 - b. Provide age-appropriate information to students on how to report concerning behaviors to a variety of safe adults
 - c. Name and contact information of at least two members of staff to report a concern
 - d. Timeframe for someone within leadership to follow up with a reporter to confirm receipt of the concern
 - e. Provide the steps it takes to respond to a concern
 - f. Formal procedure and contact person(s) to remedy concerns for those who may feel their concern was ignored or unresolved after initial reporting
 - g. Follow up with all staff, students, or parent/guardians who report a concern letting them know they have been heard, and the matter is being addressed or investigated. This allows MISD to maintain appropriate privacy and confidentiality measures, while also communicating that MISD is taking steps to respond to their concern, as well as ensures they feel their report was taken seriously, and reinforces they were correct to report. *See sample policy language in Appendix E, Internal Feedback Systems pages 1-5.*

- h. Widely republicize that an anonymous reporting method is available, as staff and parents were not all aware of the See Something, Say Something app. While direct reporting methods may be encouraged, an anonymous method available is critical for those who may fear retaliation, feel discomfort, have communication issues, or other difficulties with reporting. Also republicize other formal reporting methods to employees, parents, and students. Consider the following methods:
 - i. Providing information in Handbooks and other documentation provided to employees, parents and students
 - ii. Posting signage in public spaces such as magnets and posters
 - iii. Making announcements at trainings, employee meetings, parent and student meetings and orientations
 - iv. Updating employee and parent newsletters
 - v. Parent online portal and employee human resource management system
 - vi. Sending emails and posting on the website
2. Complete centralization of the behavioral tracking system for reported student behavior issues. Review the existing Student Discipline Procedures (3242 and 3241P) with campus administrators and staff. See the Responding section of this report for more recommendations.
3. Establish a formalized process for involving the counseling team in HIB incidents, particularly for students reported to have been the targets of these incidents.
4. Consider providing a confidential method for counselors to know the outcome of disciplinary incidents involving students they are actively working with to assist in offering support and understanding the whole picture of the student.
5. Complete centralization of documentation for reported employee boundary and policy violations. Ensure that documentation is consistently completed when concerns are raised, and that the reporter has the option to receive a copy of their report including the date/time of the report and summary of the reported information.
 - a. Retrain employees on expectations for reporting, documenting, and follow-up processes, including expectations to share student behavioral concerns with campus administration.
 - b. Provide updated reporting requirements to students and parents.
6. Create and implement a policy that requires regular review of incident data by campus administrators and include how incident data will be used to facilitate improvement plans or updates to some or all campuses. *See sample policy in Appendix E, Internal Feedback Systems on page 6.* Areas of improvement may

include:

- a. Informing policy changes or revisions
- b. Highlighting training needs and providing resources and support
- c. Identifying monitoring and supervision needs
- d. Creating or modifying safety plans
- e. Identifying potential barriers to reporting concerns
- f. Evaluating responses to incidents
- g. Responding to drift from policies and expectations

Consumer Participation

Educated consumers— students, and parents/guardians—can contribute to overall safety of the school. If students and their parents/guardians know how to recognize suspicious or inappropriate interactions or policy violations, they can be a valuable part of the risk management team. Schools should educate and empower consumers and community members on how to share their concerns and provide feedback to the school.

Findings:

Parent and student handbooks for each campus include detailed information about HIB policies, including definitions, how and when to report concerns, including contact information, and links for additional information including the reporting form and other methods of reporting. However, information about how to report concerns of boundary violations, policy violations, inappropriate behaviors or abuse are not included, nor is information and contact information about mandated reporting in Washington state. Policy 5253P states that the policy and procedure will be included on the district website and in all employee, student, and volunteer handbooks, and provided to students and parents/guardians each school year. While the policy is linked in the handbooks, it is not directly included within them like the HIB policy.

Staff reported that historically, boundary conversations were not held with parents, and there could be a lack of parent engagement. Interviewees note there has been a recent shift in practices and trying to provide more parent education.

Some policies are included in student handbooks which are presented to families at the start of the school year during registration. Students are provided the student handbook.

Parent/Guardians

Parents stay connected through online and in-person groups/events including Parent Square, Schoology (student LMS), online forums MYIFS, Parenting Mercer Island group, and social events through PTAs. Elementary schools also provide introductory coffee meetings and Curriculum & Community Night for families, and all schools offer parent/teacher conferences and open houses. The middle school hosts an incoming 6th grade parent night. Still, parents report a desire for more education about appropriate and safe ways to connect including boundaries and conflicts of interest. They often feel unclear about what their children are learning in the lessons offered, or that parent events are held at times when they cannot attend. Additionally, some parents are hesitant or misunderstand the title "sex ed" when the content is focused on boundaries.

Many parents indicated that recently the superintendent and school principals have significantly increased communication and transparency. For example, parents of students in band report receiving more specific communication about expectations, but for students not involved in those activities, their parents may only receive policies and a code of conduct. Parents of students in athletic programs feel they

receive varying levels of information depending on the sport.

Weekly newsletters include behavior expectations to address problems but are often seen as reactive rather than proactive. Parents indicated that the existing "meet the teacher" and curriculum nights could be a good opportunity to normalize engaging parents with bite-sized pieces of information about boundaries and conflicts of interest expectations.

Students

Students receive Child Protection Unit in grades 1 and 3 that include safe and unsafe touches, and lessons in the SEL curriculum about safe touching. Parents can opt out. Flash curriculum is provided to 3rd & 5th grade students that include understanding body parts, grooming, and bullying prevention. Some staff indicated they feel the curriculum does not make sense, and they should also include content on consent.

Staff indicate that these lessons are not aligned through middle school. At the middle school level, students receive information on boundaries and bullying, but there is no set curriculum, so quality varies – staff feel they rely more on posters and need more confidence and support. Most say that students have inherent trust and do not realize that it crosses a boundary to be alone with a teacher. Counselors report that 8th grade students receive education on healthy relationships, peer-to-peer issues, consent, identifying safe adults, and reporting processes.

In high school, these topics are covered in health class. However, some students can opt out of health class for a more rigorous academic schedule. Additionally, staff and students report that many students at increased risk for experiencing abuse or inappropriate behaviors do not take health or take a condensed summer course. Athletics staff indicate a desire for better student education.

A staff interview indicated that students who are nonverbal or have special needs that require AAC devices are given the language to be able to report boundary violations.

Middle school students indicated interest in having assemblies about boundaries and how to share concerns. They discussed web and in-person programs last year which included content on boundaries between staff and students, including only being alone with the door open.

High school students indicated that Schoology is not very effective for boundary communications despite being a learning management system. They have a desire for inappropriate behaviors to be treated as preventable. They requested resources be proactively provided to them rather than in response to an incident.

Students desire education that includes scenarios, explanations of healthy relationships, content on peer-to-peer and inappropriate behaviors, and critical thinking of how to handle concerns.

Praesidium Recommendations:

1. Provide students with developmentally and age-appropriate Code of Conduct and

information about appropriate and inappropriate behaviors from adults and with other students, what to do and who to tell if another person, including someone they know and trust, crosses a boundary or breaks a rule. *See Appendix F. Consumer Participation, pages 1-2. For a list of consumer education resources, see the included list of Consumer Participation Resources.*

2. Include information in the parent handbook on the child protection policies, including expectations for staff interactions with students in various settings (e.g., in school, trips, outside contact). Additionally, include Policy 5253P within the handbooks, not just a link. Like students, many parents may not know how to detect concerning behaviors. Clearly sharing these expectations with parents demonstrates MISD's commitment to taking child protection seriously. It also helps parents understand appropriate and inappropriate adult behavior with their children. It can encourage them to bring concerns to the school's attention to quickly put a stop to any inappropriate behaviors.
 - Include how to report concerns of boundary violations, policy violations, inappropriate behaviors or abuse, as well as mandated reporting and contact information for reporting concerns in Washington state.
3. Ensure parents are informed of MISD's policies and procedures related to abuse prevention. Include both written methods (such as providing parent letters, posting on parent portals, newsletters, including in handbooks and other existing forms of parent communication) and verbal methods (such as discussing in parent nights and teacher/parent conferences) to inform and involve parents.
4. Include expectations in the parent handbook and staff policies for how often education and training are provided to students or parents to create more accountability and institutional memory.
5. Provide parents with resources for how to talk to their children about their bodies and rules for appropriate touch, how to recognize boundary violations, and how to respond to their child if they disclose inappropriate behaviors or abuse. *See sample resources in Appendix F, Consumer Participation, pages 3-9.*
6. Include information for staff on how to intake student disclosures after safety education has been presented. Inform staff that disclosures are likely to increase after awareness information has been shared.

Responding

How an organization responds to suspicious or inappropriate behaviors and incidents or allegations of abuse can drastically minimize or exacerbate the impact on the individuals directly involved, on the organization, and on staff members. Once an employee, volunteer, or youth has expressed a concern or made an allegation about their treatment, steps should be taken immediately to reduce any subsequent risk to the victim, the reporter, to the accused staff, and to the organization.

Findings

Responding to Red-Flags and Policy Violations

SBIRT universal screening is done proactively to identify students at the 7th grade level who may need intervention referrals for anxiety, depression, self-harm, abuse, bullying/harassment, isolation, etc.

Policy 5253P includes requirements for reporting, documenting, and investigating concerns of boundary invasions and inappropriate behaviors including administrators documenting the concern in writing and providing a copy to the superintendent/designee who will then investigate and document in a centralized file. However, interviews indicate that those procedures are not followed in practice.

The 3207F HIB reporting form allows students and parents to report incidents of Harassment, Intimidation and Bullying, and they can also utilize the See Something, Say Something app.

Parents report that they do not clearly understand the process for reporting their concerns, fear how they will be treated and possible repercussions, and have experienced minimal if any follow up.

If there are concerns of abuse or neglect occurring at home, interviews indicated a CPS report is made in conjunction with the central office.

Responding to Youth-Youth Sexual Activity

At the elementary level for incidents between youth, administrators would typically meet with students and parents, and keep a record that the superintendent can access. If a parent brings a concern, they will interview the child and document the conversation. If any incident involves private parts the Assistant Superintendent of Compliance, Legal Affairs, & Human Resources conducts a full investigation that may result in safety plans and no contact orders between students.

Staff report the discipline processes are being revamped to include skill building.

However, sometimes the impacted students do not want anything to be done. Staff would like to improve how they talk to students, maintain confidentiality rules, and gather student input on the students' preferred outcome.

Policies 3242 and 3241P on Student Discipline Procedures provide student rights and detailed behavioral issues and possible responses. Staff indicated desire for more tier 2 strategies, such as needing a bank of responses and who is responsible.

Students requested to receive more information and understanding about their role when they are involved in investigations as witnesses,. Additionally, they report they do not feel their confidentiality is protected when making a report, that victims may be blamed, and they fear repercussions. Additionally, they discussed a newspaper article by students about how the basketball coach was "touchy" with students and he was let go, but "the school never talked about it." Regarding the incident with a prior soccer coach, the school and the community club sent out letters, but students felt the letter from the club was more transparent than the school's letter. High school students indicated feeling like there was no accountability for these incidents by school administration. They want an apology, more support, and to have more opportunities to talk openly because they are starting to feel desensitized.

There is a student care team for youth with greater needs or behavioral issues to offer additional support beyond the classroom.

Responding to Allegations

If there are concerns about staff boundary crossing behaviors, administrators indicated it will be discussed with involved parties and documented on a shared drive. Many staff interviewees indicated that this often does not happen. If action is taken then the Assistant Superintendent of Compliance, Legal Affairs, & Human Resources will likely also be involved for support and assistance and it may result in an HR Letter of Direction. Recurrences could be grounds for termination.

Most staff and administrators indicated they know they are all mandated reporters and would go to their supervisor or the central office about any concerns. However, many staff and students shared that reports are not taken seriously when reported internally. Staff shared an incident when another staff member reported that girls felt uncomfortable with a particular teacher and she was reprimanded, and many report of previous incidents that they feel were not adequately documented or addressed. Previous situations have created confusion about how to respond, and there is still not much faith that the system is set up to bring reports to the appropriate people, or raise flags and identify patterns particularly for lower-level incidents. Others feel that changes are happening and the district is doing a better job of responding and documenting.

Praesidium Recommendations:

1. Aside from anonymous reporting, there is no publicly available form available to employees, students, or parents/caregivers to report concerns of inappropriate behavior or policy and boundary violations, consider adapting the existing 3207F HIB reporting form to include those kinds of incidents and concerns as well.
 - a. Reflect those changes in the HIB policy and all student and parent facing documents such as the parent/student handbooks.
2. Establish a written procedure outlining how staff and administrators should appropriately respond to reports of red-flag behaviors, and policy violations. A swift and consistent response to these precursor behaviors can interrupt boundary-crossing behaviors before escalating to an incident of abuse or a false allegation. The procedures should include the following:
 - a. A description of what constitutes a red-flag behavior or policy violation;
 - b. What immediate steps should be followed if a red-flag behavior or policy violation has been identified;
 - c. Who should be notified of the behavior(s);
 - d. What information should be documented, and how it should be documented; and
 - e. Include examples of circumstances that must be reported.
 - f. *See sample language in Appendix G, Responding pages 1-2.*
3. Establish a written procedure outlining how staff and administrators should appropriately respond to allegations or incidents of abuse. A defined written procedure can better prepare employees for when they may need to respond to an incident. Additionally, a written procedure can more easily be referenced in times of crisis. The procedures should include the following:
 - a. A description of what constitutes as an allegation or incident of abuse;
 - b. What immediate steps should be followed when an allegation or incident occurs, including mandated reporting requirements;
 - c. Who should be notified (supervisors, external authorities, etc.);
 - d. What information should be documented, and how it should be documented; and
 - e. Include examples of circumstances that must be reported.
 - f. *See sample language in Appendix G, Responding pages 2-3.*
4. Develop a procedure for staff to respond to student-to-student sexual activity, even if it is considered to be “age appropriate”. *See sample language in Appendix G, Responding pages 4-5.*
5. Ensure a procedure is in place for supervisor and administrator response to various levels of concern including:
 - a. Responding to reports of red flags, inappropriate behaviors, policy violations, and allegations or incidents of abuse
 - b. Responding to student-to-student problematic sexual behaviors or abuse

- c. Responding to allegations of sexual abuse by a student.
 - d. Internal reviews of incidents of red-flag, inappropriate behaviors, policy violations, and allegations or incidents of abuse. *See sample policies in Appendix G, Responding, on pages 6-9.*
6. Include language that expressly stipulates that external investigations by the local authorities take precedence, providing a victim-centered response to disclosures and incidents, and using risk management tools to review root-cause analysis of incidents and take steps to address identified gaps.
7. Develop and implement a crisis response plan for instances of sexual abuse allegations and include how employees will respond to a victim that is actively disclosing abuse. The plan should also include campus resources and external resources to aid the campus in their response such as, counseling services on campus, vetted external counseling partners, insurance notification, and how to respond to parent or community questions. *For an example plan, see Appendix G, Responding, pages 10-19.*

Administrative Practices

Third party contractors and vendors need clear policies and expectations for screening, training, and monitoring and supervision expectations. Additionally, the governing body or school board is ultimately responsible for approving policies and safety protocols. Therefore, those entities must be well informed of the risks inherent within the organization, standard risk management practices across all programs, and operational practices in place to ensure the safety of all involved and affiliated with the organization. Organizational leadership must ensure that third party relationships are clearly monitored, and drift from standards of safety and care is quickly identified and remedied.

Findings:

Policies for third-party vendors, contractors, and facility rentals are thorough and include step by step processes for approval, screening, and providing insurance and hold harmless and indemnity – they are not permitted on campus until all steps have been completed. Facility rentals require a certificate of insurance and are not required to complete background screening.

School administrators, custodians, safety officers, SRO, and others all receive 2-week look-ahead emails with information about who will be on campus and when. Most programs take place before or after school, with some on the weekends. Third parties are expected to check in on arrival and use the Raptor system, but interviews indicated this frequently does not happen in practice. There is a particular challenge with music tutors following this policy.

The policy is clear and nearly all processes are handled at the district level, but some administrators and staff report being unclear on the process and not knowing who is supposed to be present and when. Administrators typically do not have access to contact information for those who are physically on site, but would have a primary point of contact. The point of contact is expected to be on campus, but this is not always the case. A possible solution identified was to require these third parties to wear a distinctive lanyard and identification that clearly designates that they are not employees or parents, but are permitted on campus.

Praesidium Recommendations:

1. Provide expectations for District and Campus leadership on training, communication, and transition plans to ensure that abuse prevention efforts remain a top priority.
For a sample transition plan checklist, see Appendix H, Administrative Practices, pages 1-5.
2. Establish guidelines or minimum standards that third-parties must follow to ensure that everyone with access to students is screened first, including those who may be brought in to cover for other staff from contractor/vendor organizations.
 - a. Consider reviewing MISD's code of conduct with contracted vendor

- supervisors, including the policies for interacting with children on campus and all vendor employees sign an acknowledgement
- b. Include required abuse prevention awareness training for vendors who have regular access to MISD campuses
 - c. Whenever feasible, include behaviorally based interview questions that can raise potential red flags for vendor positions
 - d. Enforce existing requirements for screening third parties and tracking their presence while on campus. Consider implementing consequences for failure to comply with policies to ensure compliance
 - e. *For sample procedures for managing abuse risk with third parties, see Appendix H, Administrative Practices pages 6-8.*
3. Require those renting facilities to also complete the same background screening as other third-parties with access to students.
4. Require vendors and contractors including non-district employee tutors, music instructors, and athletic coaches to wear a distinctive lanyard with identification that clearly designates that they are not employees or parents, but are permitted on campus. *For sample procedures for managing abuse risk with third parties, see Appendix H, Administrative Practices page 9.*

Additional Considerations

District leaders have consistently demonstrated strong commitment to change and identifying indicators of success, trends over time, and ways to measure cultural change. Indicators such as incident reports, tips, and disclosures are valuable indicators – particularly looking at trends over time. Additionally, prevention efforts such as trainings, monitoring and supervision practices, annual policy reviews, staff and volunteer background screening and rescreening, and student/parent communications and surveys are all important indicators of cultural change over time. The Student Safety and Wellbeing Committee will be an essential partner in these efforts and may be tasked with spearheading some of them.

School and Community Culture

Many interviews from administrators, staff, parents, and students discussed some elements of the culture and traditions on Mercer Island as a barrier to implementing change. Some parents mentioned a tendency to hold the district accountable more than the city because it is difficult to discern between the city, the district, and the union. Overall, there is a pervasive permissive community culture that spills over into schools, often outside of their control, and sets the tone for things to occur – including adages such as, "it's just the way it is" or "boys will be boys".

Some discussed that hazing or sexual harassment may be permitted because some parents accept and allow them, or staff members do not want to “make waves.” Interviewees described the dynamics on the island as feeling like a community and also identified a variety of complex dynamics and experiences that contribute to the island's culture, such as:

- Power dynamics due to money, or length of time in the community and/or with the district. Culture of normalizing student to student issues because “everyone has lawyers” that prevent issues from being adequately addressed
- Extensive gossip in the community and particularly online, but the discourse is often not brought to the district directly
- Patriarchal/macho culture, many women experienced different level of frustration with this
- Dirty Dads podcast that reportedly includes sexualized discussions
- Reports that many kids will know of sexual assaults or inappropriate relationships that have not been reported. Lots of open secrets
- Former “mancave” culture. Even though the physical location has been dismantled, many report elements of the culture remaining and women feeling disadvantaged
- Upperclassman trying to take sophomores and freshman under their wing to “gain sexual experience before they go to college.”

- Some high school boys reportedly have websites targeting “7th and 8th grade virgins”
- "Snail Pound" and "Islander Girls" have a longstanding history in MIHS as spirit groups, but are not officially school affiliated, though the district has offered to make them official clubs that can be overseen by the school. There are rumors of hazing, sometimes of sexual nature; use of pills & alcohol, but parents protect these groups, and students are permitted to wear their gear to school.

Many students, parents, and the Student Safety and Wellbeing Committee discussed the changing demographics on the island, with increasing numbers of mixed and Asian families. Certain communities are less likely to attract attention to themselves, particularly first-generation immigrant parents who may not understand the culture or are concerned about questioning authority – there is a fear of limiting their ability to participate in extracurricular activities. Parents and students report that Asian girls are less likely to speak up, despite reporting feeling disproportionately targeted by inappropriate staff behavior. Parents report needing a set of advocates in the counseling and administrative staff, expressing that there is “not a single one of color” and that culture is not considered when sharing parent and student information. Youth of color are more likely to be reported and to receive harsher consequences.

Additionally, the CREST program reports feeling left out of conversation pertaining to abuse prevention, maintaining appropriate boundaries, and reporting. Teachers in the program feel, “it is just on them” to handle behavioral issues that arise.

Despite repeated concerns about boundary violations and reports not be taken seriously, many also said that the community is very trusting and there is a belief that, “they have been here a long time...so no need to worry about them”, and difficulty in holding one another accountable.

Specialized Resources and Staffing

As mentioned above, the Student Safety and Wellbeing Committee is a tremendous asset and will be an essential partner in ongoing prevention efforts and implementing change. The Committee currently consists of four sub-committees:

1. Students
2. Professional Boundaries
3. Reporting and Follow up
4. Student Learning & Staff Training

It is comprised of members of the school board, administration, staff and students, as well as parents and community members, including specialized agencies. While meeting with the Committee during Praesidium’s visit in April, we discussed the

longevity and future directions of the committee. It is recommended that the Committee continue indefinitely to continue its role in investigating and making recommendations for ongoing abuse prevention efforts. It functions as an important mechanism for involving consumers (parents, students, and the community) in maintaining the momentum for change and helping the district to prevent drift from new standards and policies. The Committee may also assist with maintaining accountability and fidelity to improvements made as a result of the recommendations provided here, as well as by the Committee itself. Members may consider future directions for continuous improvement and self-evaluation, that may result in changes to the existing subcommittees – for example, instituting an Implementation and Accountability subcommittee.

Site Visit Observations – General

Many unused/unoccupied classrooms and spaces remained unlocked, in some cases with metallic strips over the locking mechanism. Consider removing these and requiring that doors to classrooms and other spaces remain locked when not in use. This ensures that rooms are not accessible to students or adults where they cannot be observed.

Additionally, coverings on several classroom doors/windows do not allow visibility inside. This includes outdoor portables, which already pose additional difficulties for monitoring due to remote location. In some cases, this also included rooms where 1:1 interactions were likely to occur, such as counselor's offices, PT/OT rooms, and sensory rooms. Consider prohibiting permanent coverings (pull down shades or blinds are okay) on doors/windows to ensure visibility into classrooms, or explore other options to increase visibility.

Staff have their own restrooms which are unlocked. Consider keeping staff bathrooms locked so students cannot access them.

Cameras are located in public areas such as hallways, gyms, cafeterias, and busses. Cameras are not monitored in real time, but are reviewed if there is an incident. Cameras are not located or allowed in classrooms due to union rules. Cameras are also not located in sensory rooms or bathrooms.

Campuses are generally open and accessible to the public. A consistent concern that was brought up by school leadership and also was observed on our visit was that community members regularly wander through campuses on walks or with their dog. Often there are no gates, but if there is a gate it will generally be locked during the school day, unless open for students to pass through to other campuses or on their way home from school.

Site Visit Observations by Campus

Lake Ridge Elementary:

- Visitors were required to check in using the Raptor system before entering.
- There are some areas outside that are difficult to supervise due to very large outdoor space, outdoor courts, etc. Youth are mixed with younger and older grades taking recess at the same time. Zone monitoring occurs, but youth in different grades are not separated in different play areas. Interviews indicated additional supervision for recess would be beneficial especially given the large space. Consider additional staff for outdoor periods and/or increasing visibility in areas which are obstructed when/if funding/union rules allow. Otherwise, consider blocking off certain areas that are difficult to observe to reduce risk of unsupervised youth. Additionally, consider restructuring recess times to align with the other elementary schools, so that younger and older children are separated.
- Middle school students will go through parking lot to get through to their homes in the back, gates are unlocked at 3.
- Sign in sign out for bathrooms, one at a time. There is not active monitoring around the bathrooms, but there are cameras in the hallways and staff can easily hear from outside. Hallways are separated by primary and secondary, so older and younger kids are generally separated by their location.

West Mercer Elementary:

- Visitor check-in was available, but does not appear to be consistently applied. On the day of our visit, we were able to walk in without being asked to check in and use the Raptor system.
- Students sign out to use the restroom, and some have passes. One student from one class at a time is allowed to use the restroom. The bathroom is inside for recess. Students have to ask an adult to scan them into the building to use it.
- Recess is separated by K-2 and 3-5. Principal described zone monitoring.

Island Park Elementary:

- Visitors are required to check in and complete Raptor check.
- Youth are dismissed to go to bathroom alone. There are no outdoor bathrooms so when at recess, youth will get buzzed inside the hallway to go to bathroom, but it is not clear how staff would know who or when someone is inside the bathrooms. Consider strengthening bathroom procedures for when youth are outside/going inside to ensure consistent supervision and knowledge of student's whereabouts.
- There are some areas that are difficult to supervise due to obstructions like walls, behind shed, etc. Youth are separated into K-2 and then 3-5 for recess and zone monitoring occurs, but the it was mentioned that additional supervision for recess/entering and exiting spaces would be beneficial. Consider additional staff for

outdoor periods and/or increasing visibility in areas which are obstructed when/if funding/union rules allow. Otherwise, consider blocking off certain areas that are difficult to observe to reduce risk of unsupervised youth.

Northwood Elementary:

- Visitors were required to sign in and out using the Raptor system.
- Restroom sinks are out in the open. There is one gender neutral bathroom, otherwise stalls and urinals are inside. There are bathrooms out in portables for recess where a staff member is stationed nearby.
- Recess is separated by K-2 and 3-5, and is supervised by paraprofessionals. Zone monitoring occurs and staff are stationed on field with clear boundaries. There is a staircase that youth are not able to access, and typically a gate preventing access but it was broken. Consider repairing the gate as soon as possible.

Islander Middle School:

- Visitor check-in was available, but does not appear to be consistently applied. On the day of our visit, we were able to walk in without being asked to check in and use the Raptor system.

Mercer Island High School:

- Visitor check-in was available, but does not appear to be consistently applied. On the day of our visit, we were able to walk in without being asked to check in and use the Raptor system.
- Some classrooms and most offices are difficult to monitor due to physical location down hallways or within classrooms. Consider requiring that 1:1 student/teacher meetings must take place in publicly observable spaces such as classrooms with the door open, the library, cafeteria, or commons.