

# WINDSOR LOCKS PUBLIC SCHOOLS



## BOARD OF EDUCATION MEETING

**Special Meeting**

**August 29, 2024**

**6:00 p.m.**

**Windsor Locks High School - Library Media Center**

**In Person Attendance Open to All**

**Optional Public Attendance via Microsoft Teams**

**[Click Here for Teams Link](#)**

**Windsor Locks Board of Education**

**Kylee Christianson, Chairwoman**

**Dennis Gragnolati, Vice Chairman**

**Lindsay Cutler**

**Alba Osorio**

**Greg Guyette**

**Superintendent of Schools**

**Shawn Parkhurst**

### **DISTRICT 2022-2025 (3) THREE YEAR VISION**

*All students will meet or exceed grade-level standards because we want all students to feel a sense of accomplishment to pursue their passion.*

**Board of Education**  
**Town of Windsor Locks**  
**Special Meeting - Agenda**  
**August 29, 2024 - 6:00 pm**  
**Windsor Locks High School - Library Media Center**  
**In-Person Attendance Open**  
**Optional Public Attendance via Microsoft Teams - [Click Here for Teams Link](#)**

- I. Call to Order
  - A. Roll Call
  - B. Pledge of Allegiance
- II. Board of Education and Superintendent Communications
- III. Donation to WLPS: **Vote Needed** p. 5 Exhibit I
- IV. Approval of Minutes: **Vote Needed** p. 6 Exhibit II
  - June 3, 2024 Special Meeting
  - June 13, 2024 Regular Meeting
- V. Personnel Report
  - A. Resignations: **Vote Needed** p. 16 Exhibit III A
  - B. Job Descriptions: **Vote Needed** p. 17 Exhibit III B
    - Tutor
    - Nurse Supervisor (stipend position)
    - Executive Assistant to the Superintendent
    - Tutor - ELL
    - School Climate Coordinator
    - School Climate Specialist
    - High School Director of Guidance (stipend position)
  - C. Update on Open Positions p. 42 Exhibit III C
  - D. Director of Finance and Operations Search Update p. 43 Exhibit III D
- VI. Policy Priority List p. 44 Exhibit IV
  - A. Mandated Policy List
- VII. Policy Review: p. 45 Exhibit V
  - A. Second Read/Approval: **Vote Possible**
    - 5142.4 School Resource Officer *Revision* p. 46
    - 9170 Distribution of Diplomas *New* p. 48
  - B. First Read/Review:
    - 0521 Nondiscrimination *Revision* p. 49
    - 2400 Evaluation of Superintendent *Revision* p. 57
    - 3850 Pesticide Application *Revision* p. 65
    - 4000.1/4200.1/5145.44 Title IX *New* p. 68
    - 5145.12 Search and Seizure *Revision* p. 98

-	6141.323	Internet Safety Policy/Filtering	<i>New</i>	p. 110
-	6164.11	Student Use, Sale or Possession of Alcohol or Controlled Drugs	<i>Revision</i>	p. 112
-	6164.12	Exemption from AIDS Instruction	<i>Revision</i>	p. 113
-	6170	Homework: Change #6154	<i>Revision</i>	p. 114
VIII.	2024-2025 Revised School Calendar: <b>Vote Needed</b>			p. 117 Exhibit VI
IX.	Discussion of October 24, 2024 Board Meeting: <b>Vote Possible</b>			p. 118 Exhibit VII
X.	Capital Improvement Project – North Street School Partial Roof Replacement: <b>Vote Needed</b>			p. 119 Exhibit VIII
XI.	CSDE Bureau of Special Education Integrated Monitoring Report			p. 121 Exhibit IX
XII.	Medical Insurance Presentation & Discussion			p. 140 Exhibit X
XIII.	Board and Superintendent Comment			
XIV.	Public Audience (General)			
A.	<i>In Accordance with BOE Policy 1100 - The Windsor Locks Board of Education (Board) Chairperson shall recognize speakers, request proper identification and maintain proper order. The Board shall hear only concerns, views, and opinions on topics within the jurisdiction of the Board. The appropriateness of the subject being presented, the suitability of the time for such presentation, the number of speakers, and the time to be allowed for public comment will be determined by the Chairperson. The public is advised that any discussion of specific employees will not be allowed at meetings and should be addressed to the employee's immediate supervisor or the Superintendent.</i>			
XV.	Executive Session: To adjourn the meeting to Executive Session as permitted by Connecticut General Statutes Section 1-225(a) for the following purposes as allowed by Section 1-200(6), that is:			
A.	Confidential Student Matter - Out of Town Residency Request to Remain in Windsor Locks Public Schools			
	That attendance in the Executive Session shall be limited to:			
	<ol style="list-style-type: none"> <li>1. Members of the Board of Education</li> <li>2. Superintendent of Schools</li> <li>3. Windsor Locks High School Principal</li> <li>4. Windsor Locks Middle School Principal</li> <li>5. Others if Requested to Attend</li> </ol>			
B.	Superintendent Goals & Evaluation Discussion			
	That attendance in the Executive Session shall be limited to:			
	<ol style="list-style-type: none"> <li>1. Members of the Board of Education</li> <li>2. Superintendent of Schools</li> <li>3. Director of Human Resources</li> <li>4. Others if Requested to Attend</li> </ol>			

XVI. Action, if any, on Executive Session Items: **Vote Possible**

XVII. Adjourn Meeting

For the Chairperson of the Board of Education  
Shawn L. Parkhurst - Superintendent of Schools

Copy: Town Clerk - Please Post

## EXHIBIT I

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION

FROM: SHAWN L. PARKHURST, SUPERINTENDENT

DATE: AUGUST 29, 2024

RE: DONATION

During the late Spring, WLPS was contacted by AHLSTROM to view the variety of science supplies they had available for a donation to WLPS. Our Director of Curriculum, Megan Parrette, along with a few staff members, determined that these would be valuable resources to WLPS.

AHLSTROM has generously donated new unused science supplies including: test tubes, petri dishes, beakers, various glass and ceramic ware, and funnels to name a few. In total their donation is valued at \$20,605.88.

**BOARD MOTION:** “Move that the Board of Education accept the generous donation from Ahlstrom, and offer them our sincere gratitude.”

**EXHIBIT II**

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION  
FROM: SHAWN L. PARKHURST, SUPERINTENDENT  
DATE: AUGUST 29, 2024  
RE: APPROVAL OF MINUTES

June 3, 2024 Special Meeting

June 13, 2024 Regular Meeting

**Board Motion:** “**Move** that the Board of Education approve the minutes of the June 3, 2024 Special Meeting and the June 13, 2024 Regular Meeting.”

**Windsor Locks Board of Education  
58 South Elm Street  
Windsor Locks, CT 06096**

**These minutes are not official until approved at a subsequent meeting.**

**MINUTES OF THE SPECIAL MEETING  
June 3, 2024 at 4:00 p.m.**

Members Present: K. Christianson, D. Gragnolati, L. Cutler, A. Osorio, and G. Guyette  
Members Absent: None  
Administrators: S. Parkhurst, R. Bissonnette, and K. Krupa  
Staff: None  
Students: Student F  
Others: Mother of Student F

**I. Call to Order**

Chairwoman Ms. Kylee Christianson called the Special Meeting to Order at 4:00 p.m., in the Windsor Locks Public School Professional Development Room.

**II. Roll Call**

Board Members Mr. Dennis Gragnolati, Ms. Lindsay Cutler, and Ms. Alba. Osorio were present.

**III. Pledge of Allegiance**

Everyone present stood and pledged allegiance to the flag.

**IV. Executive Session**

It was **MOVED** (Cutler) and **SECONDED** (Osorio) and **PASSED** (U), that the Board of Education enters into Executive Session to conduct a student expulsion hearing and to preserve the confidentiality of student records, and that the following be invited to attend the executive session to offer testimony: Superintendent of Schools, High School Administration, witnesses to testify for the administration, student and parents, witnesses for student and parents, legal counsel for the Board of Education and the administration, and the student, if present.

Chairwoman Ms. Christianson asked all persons in attendance to identify themselves for the record:

Board of Education Members:

Mr. Greg Guyette  
Ms. Lindsay Cutler  
Mr. Dennis Gragnolati

Ms. Kylee Christianson  
Ms. Alba Osorio

Others:

Student F  
Mother of Student F  
Mr. Shawn Parkhurst, Superintendent of Windsor Locks Public School  
Dr. Rebecca Bissonnette, Principal of Windsor Locks High School  
Ms. Kirsten Krupa, Assistant Principal of Windsor Locks High School  
Ms. Denise Piotrowicz, Recording Secretary, Windsor Locks Board of Education

Witnesses were sworn in by Chairwoman Ms. Christianson.

**V. Action Regarding Expulsion**

Dr. Rebecca Bissonnette, Ms. Kirsten Krupa, and Student F gave testimony regarding the offense, followed by questions from the Board of Education Members.  
Board Recessed at 4:12 p.m.  
Board Reconvened at 4:17 p.m.

Chairwoman, Ms. Christianson indicated after a discussion, the Board had decided Student F engaged in conduct that violated Board policy and therefore committed an expellable offense.

**VI. Action Regarding Expulsion**

Testimony regarding the penalty phase of the expulsion was given by Dr. Rebecca Bissonnette, Ms. Kirsten Krupa, and Mother of Student F followed by questions from the Board of Education Members.  
Board Recessed at 4:30 p.m.  
Board Reconvened at 4:40 p.m.

Chairwoman Ms. Christianson indicated Student F shall be expelled in accordance with the terms and conditions of the administrations recommendations as amended.

It was **MOVED** (Osorio) and **SECONDED** (Gragnotati) and **PASSED** (U), that the Board of Education to reconvene into public session at 4:46 p.m.

**VII. Adjournment**

It was **MOVED** (Guyette) and **SECONDED** (Osorio) and **PASSED** (U) that the Board of Education adjourns the June 3, 2024 Special Meeting at 4:47 p.m.

Respectfully Submitted,

Denise M. Piotrowicz  
Recording Secretary



**Windsor Locks Board of Education  
58 South Elm Street  
Windsor Locks, CT 06096**

**MINUTES OF THE REGULAR MEETING  
June 13, 2024 at 6:00 p.m.**

These minutes are not official until approved at a subsequent meeting.

Members Present:	K. Christianson, D. Gragnolati, L. Cutler, A. Osorio, and G. Guyette
Members Absent:	None
Administrators:	S. Parkhurst, R. Stacy, K. Krupa, M. Parrette, and V. Breda
Student Representatives:	None
Students:	X. Angel
Staff:	D. Bole, J. Garcia, and L. Sullivan
Others:	D. Glazier, M. Hannaford and a few others and some participating on Microsoft Teams
Press:	None

**I. Call to Order**

Chairperson Ms. Kylee Christianson called the Regular Meeting to Order at 6:00 p.m. held at the Windsor Locks High School Media Center and via Microsoft Teams.

**A. Roll Call for Quorum**

All Board Members were present.

**B. Pledge of Allegiance**

All stood up and pledged allegiance to the flag.

**II. Board of Education and Superintendent Communications**

Vice-Chairman Mr. Gragnolati noted he attended the Windsor Locks Middle School Awards Ceremony. The program was well done!

Mr. Shawn Parkhurst, Superintendent of Schools, addressed the Board. He thanked the Board of Education and the community at large, for their support during the school year and finished the year out with graduation. Unfortunately, everyone had to weather the storm at graduation, but it was a great event nonetheless.

It was **MOVED** (Gragnolati) and **SECONDED** (Guyette) and **PASSED** (U) that the Board of Education move Agenda Item No. XII. Public Audience (General) and to include this Agenda Item with Agenda Item No. III Public Audience (only Agenda Items).

### **III. Public Audience (only Agenda Items)**

Mr. Douglas Glazier of 167 Taft Lane addressed the Board. He is a member of the Police Commission and he just found out that the Board of Education has eliminated one of the SROs after one year of service. He asked if it is true and the Chairwoman answered him in the affirmative. He indicated the Board received funding for four officers (SRO) last year, and unfortunately, the Board has eliminated one officer, who was stationed at North Street School. It is his opinion that this decision is a mistake. Police officers should be in all of the schools to protect the children. If there is a shooter on school grounds, an officer at the school is the quickest person to respond to the incident rather than waiting for another officer from another school which could take 5 or 10 minutes. Children will be killed. If the SRO is in the school, children will be saved. He asked how they will stand up to the community to justify why they cut that position, if something should happen. The Board is only saving about \$60,000, is it worth the savings? He offered to attend a Board of Finance Meeting to request for money to reinstate the SRO, perhaps out of the contingency fund. He understands the budget has been set, but he urged the Board to reconsider their decision about cutting the SRO position at North Street School.

Mr. Mike Hannaford of 78 Leslie Street addressed the Board. He is the Chairman of the Windsor Locks Police Commission and he was a police officer for over 35 years. He too is trying to understand the elimination of the SRO position at North Street School. He remembers the swatting incident that happened at the middle school, the public hearing after that incident and the public outcry for safety of the schools and the support of having SROs in all schools. He has lived in this town since 1990 and his sons have attended the public schools and he has always supported the schools. He understands the hardships with budgets and unfunded State mandates which makes budgeting very difficult; however, the safety of the children of Windsor Locks is very important. The Police Commission is not supporting this decision and the Commission hopes to the Board will maintain the SRO position as once you lose a position, it is very hard to get it back.

There was another person who wanted to speak and she was online, but she was having technical difficulty and the Chairwoman decided to move on with the meeting.

### **IV. Student Recognition**

#### **NCCC All-Conference Honors: Baseball and Softball**

Mr. Parkhurst celebrated and recognized two of student athletes that were recently honored at the NCCC Conference Tournament in Suffield. He congratulated to the following Windsor Locks High School Student Athletes:

- Alisha Burns - NCCC All-Conference Honors Softball (Not in attendance.)
- Xavier Angel - NCCC All-Conference Honors Baseball

### **V. Approval of Minutes**

#### **May 14, 2024 Special Meeting**

## **May 22 ,2024 Special Meeting**

It was **MOVED** (Guyette) and **SECONDED** (Osorio) and **PASSED** (U) that the Board of Education approve the minutes of the May 14, 2024 Special Meeting and the May 22, 2024 Special Meeting as presented.

### **VI. Personnel Report: Resignation**

#### **A. Staff Service Recognition**

Mr. Robert Stacy, Director of Human Resources, addressed the Board. He explained a series of charts were in their packets recognizing staff for longevity, retirement and tenure. Staff are recognized in five (5) year increments for service to the district. Forty-five (45) staff members are being recognized this year with service from five (5) to forty (40) years. Total years of service to the district equals 620 years. Nine (9) staff members are retiring from Windsor Locks this year. Total years of service to the district equals 199 years. Eight (8) educators achieved tenure at the end of this school year. This was the culmination of four (4) years of successful teaching service to the Windsor Locks Public Schools. He noted the Superintendent, the Board Chairwoman and himself surprised those eight teachers and notified them of achieving tenure.

#### **B. Resignations**

Mr. Stacy addressed the Board. He commented he has received the following four resignations:

- Ms. Sandra Zajac-Naylor, Windsor Locks Middle School Librarian, will resign effective June 30, 2024. Ms. Zajac-Naylor has served the students of Windsor Locks for 28 years.
- Ms. Melissa Ewing, Windsor Locks Middle School English Teacher, will resign effective June 30, 2024. Ms. Ewing has served the students of Windsor Locks for 1 year.
- Ms. Deb Luzetti, Windsor Locks High School Life Skills Teacher, will resign effective June 30, 2024. Ms. Luzetti has served the students of Windsor Locks for 2 years.
- Ms. Sara Dvorsky, Windsor Locks Middle School Music Teacher, will resign effective June 30, 2024. Ms. Dvorsky has served the students of Windsor Locks for one (1) year.

It was **MOVED** (Cutler) and **SECONDED** (Gragnolati) and **PASSED** (U) that the Board of Education accepts the resignation of Ms. Sandra Naylor, Ms. Melissa Ewing, Ms. Deb Luzetti, and Ms. Sara Dvorsky on the dates noted and offer our appreciation for their service to the students of Windsor Locks.

### **C. Job Descriptions**

Mr. Stacy noted the job descriptions were given to the Board for their review for a first and second read and approval.

Second Read and Approval:

- Director of Pupil Services (formerly Special Services)

First Read for Review:

- Tutor
- Nurse Supervisor (Stipend Position)

A brief discussion was held.

It was **MOVED** (Guyette) and **SECONDED** (Osorio) and **PASSED** (U) that the Board of Education approves the revised job description presented as a second read.

### **D. Director of Finance and Operations Search Update**

Mr. Stacy indicated a search committee has been established which is comprised of the Superintendent, the Director of Human Resources, the Director of Pupil Services, and the High School Principal. The committee will have pre-screened six (6) to eight (8) of the almost twenty (20) applicants. The goal is to pre-screen an initial group of candidates to bring back for full interviews the week of June 17th. The full interviews will include the following members: the Director of Facilities, the President of the Administrative Assistants Union, and a representative from the Teachers Union. The goal is to then identify two finalists to present to the Board for consideration the week of June 24th. As this is a challenging time of year, the scheduling of interviews and timeline are subject to change.

## **VII. Policy Priority List**

### **A. Mandated Policy List**

Mr. Stacy gave a mandated policy list for the Board to review and a basic timeline of when those policies will be presented to the Board for review and approval.

## **VIII. Policy Review:**

### **A. Second Read/Approval**

- **0200 Statement of Education Goals & Student Objectives *New***
- **4112/4212 Appointment (of staff) *Revise 4112/New 4212***

### **B. First Read/Review**

- **5142.4 School Resource Officer *Revision***
- **9170 Distribution of Diplomas *New***

It was **MOVED** (Guyette) and **SECONDED** (Osorio) and **PASSED** (U) that the Board of Education approves Policies 0200 State of Education Goals & Student Objectives, and 4112/4212 Appointment of Staff as presented.

The person online who wanted to speak during the Public Audience portion of the meeting but had technical difficulty interrupted the meeting. Chairwoman Ms. Christianson allowed Lauren to speak to the Board.

Lauren indicated she was very passionate about the topic of the elimination of the SRO. She remembers last year when she and others were begging the Board of Finance to fund the SROs in the schools for the safety of the children in the schools. After a stressful year with the multiple threats made to the schools, the community begged to have the SROs to have an additional line of defense. Since the SROs were approved one year ago, the incidents have decreased and parents are less stressed about sending their children to school. She has a daughter at North Street School, and the SRO has become a big part of her school environment, not just greeting the students to school and saying good-bye during dismissal. She understands the difficult decisions the Board has to make while constructing a budget and she does not envy their positions, but she would like the Board to reconsider their decision of eliminating the SRO at North Street School.

Chairwoman Ms. Christianson indicated the Board is not to respond to Public Audience, however, as the Board continues to navigate the challenges as Board Members, she encourages parents and the community to become involved and informed with decisions that the Board has to make through the year, including budgetary decisions. She encourages the community and parents to become involved and attend meeting to voice their opinions when hard decisions have to be made throughout the year.

### **IX. Special Education Tuition & Excess Cost Grant**

Mr. Parkhurst introduced Ms. Valerie Breda, Staff Accountant/Grants Manager, to the Board. Ms. Breda gave a status of the BOE Net Out-of-District Budget as of May 31, 2024 as follows:

- The 2023-2024 net out-of-district budget for special education was based on sixteen (16) Windsor Locks out-of-district placements, three (3) Hartford Choice out-of-district placements, and zero (0) DCF placements for a total of (19) nineteen students.
- The Actual 2023-2024 out-of-district projected expenditure for special education as of May 31, 2024, is for twelve point nine one (12.91) Windsor Locks out-of-district placements, five (5) Hartford Choice out-of-district placements, and zero (0) DCF placements for a total of seventeen point nine one (17.91) students.
- The current projection is for eleven (11) students to qualify for excess cost reimbursement at 69.0613% with a per-pupil cost of \$21,565 or \$97,042.50 (4.5 times the per-pupil cost). The capped entitlement

amount posted for the Town of Windsor Locks to receive is \$449,728.

· The district will not require the Special Education Excess Cost Grant to cover additional student outplacement costs for FY24.

A brief discussion was held.

#### **X. K-2 Reading Instructional Strategies Presentation**

Mr. Parkhurst introduced Ms. Megan Parrette, Director of STEAM Curriculum, Instruction and Assessment and Ms. Laura Sullivan, second grade teacher at North Street School to present the K-2 new reading curriculum. It was explained that adoption of a State approved reading program by July 2024 is a requirement from the Connecticut State Department of Education under the new Right to Read legislation. Over the past two years, the district Curriculum Department and K-2 Team reviewed various State approved reading programs and this past year, piloted *Amplify CKLA*. As a result of that work, and the work of our District Literacy Team, Ms. Parrette and Ms. Sullivan presented and recommended *Amplify CKLA* be the Windsor Locks Public Schools K-2 reading program to be used in all K-2 classrooms at the start of the 24-25 school year.

The pair gave a presentation of the program and explained the pilot which took place this past school year.

A brief discussion was held.

It was **MOVED** (Gragnolati) and **SECONDED** (Cutler) and **PASSED** (U) that the Board of Education approves *Amplify CKLA* to be the K-2 reading program as recommended.

#### **XI. Board and Superintendent Comment**

None.

#### **XII. Public Audience (General)**

Moved to the beginning of the meeting.

#### **XIII. EXECUTIVE SESSION**

It was **MOVED** (Cutler) and **SECONDED** (Guyette) and **PASSED** (U) that the Board of Education adjourn the meeting to Executive Session as permitted by Connecticut General Statutes Section 1-225(a) for the following purposes as allowed by Section 1-200(6), that is:

A. Discussion of United Public Service Employees Union (UPSEU) Local 424 - Unit 119 Custodial/Maintenance Employees Bargaining Unit Negotiations

That attendance in the Executive Session shall be limited to:

- Members of the Board of Education
- Superintendent

- Director of Human Resources
- Others as Requested to Attend

B. Superintendent Goals & Contract Discussion

That attendance in the Executive Session shall be limited to:

- Members of the Board of Education
- Superintendent of Schools
- Others as Requested to Attend

Board moved into executive session at 6:48 p.m.

Board returned to public session at 7:39 p.m.

It was **MOVED** (Cutler) and **SECONDED** (Osorio) and **PASSED** (U) that the Board of Education approves the UPSEU Local 424 Unit 119 Custodial/Maintenance Employees Bargaining Unit Contract as presented.

It was **MOVED** (Gragnolati) and **SECONDED** (Cutler) and **PASSED** (U) that the Board of Education extends the Superintendent of Schools contract through June 30, 2027 to the agreed upon terms and conditions as presented by the Board of Education.

**XIV. Adjournment**

It was **MOVED** (Gragnolati) and **SECONDED** (Cutler) and **PASSED** (U) that the Board of Education adjourn the Regular Meeting of June 13, 2024 at 7:42 p.m.

Respectfully submitted,

Denise M. Piotrowicz  
Recording Secretary

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION

FROM: ROBERT STACY, DIRECTOR OF HUMAN RESOURCES

DATE: AUGUST 29, 2024

RE: PERSONNEL REPORT - RESIGNATIONS

**Resignations:**

Stephanie Cota, a Special Education Teacher at South Elementary School, resigned effective June 30<sup>th</sup>. Stephanie served the students of Windsor Locks for 4 years.

Kristi Fields, a Pre-K Teacher at North Street School, resigned effective June 30<sup>th</sup>. Kristi has served the students of Windsor Locks for 23 years.

Eva Martinez, a Reading Teacher at South Elementary School, resigned effective June 30<sup>th</sup>. Eva has served the students of Windsor Locks for 6 years.

Stephanie McMeans, a Special Education Teacher at North Street School, resigned effective June 30<sup>th</sup>. Stephanie has served the students of Windsor Locks for 5 years.

Amanda Upchurch, a Special Education Teacher at North Street School, resigned August 12<sup>th</sup>, effective September 11<sup>th</sup>. Amanda has served the students of Windsor Locks for about 6 months.

Evan Woicik, a Special Education Teacher at Windsor Locks High School, resigned August 15<sup>th</sup>, effective September 14<sup>th</sup>. Evan has served the students of Windsor Locks for 5 years.

Nicole Ciccarelli, a Grade 6 Science Teacher at Windsor Locks Middle School, resigned August 16, 2024, effective September 15, 2024. Nicole has served the students of Windsor Locks for 6 years.

**BOARD MOTION:** “**MOVE** that the Board of Education accepts the resignations on the dates noted and offer our appreciation for their service to the Windsor Locks Public Schools.”



**EXHIBIT III B**

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION  
FROM: ROBERT A. STACY, DIRECTOR OF HUMAN RESOURCES  
DATE: AUGUST 29, 2024  
RE: PERSONNEL REPORT - JOB DESCRIPTION REVISIONS

The job descriptions attached are presented for Board approval.

Second Read and Approval:

- Tutor
- Nurse Supervisor (Stipend Position)

First Read for Review:

- Executive Assistant to the Superintendent
- Tutor - ELL
- School Climate Coordinator
- School Climate Specialist
- HS Director of Guidance (Stipend Position)

NOTE: ~~Strike through~~ indicates language to be deleted.  
Underline means language to be added.

**BOARD MOTION:**

“**MOVE** that the Board of Education approve the revised job description(s) presented as second reads.”

**WINDSOR LOCKS PUBLIC SCHOOLS  
POSITION DESCRIPTION**

**Position Title:** School Based Tutor – Special Education Classroom

Department: Special Services

Reports to: <sup>[OBJ]</sup> ~~Special Services~~ Director of Pupil Services

Created: 2011 Revised: June 2024

**SUMMARY:** <sup>[OBJ]</sup>

To provide ongoing educational programs to children in the district, including special education instruction.

**ESSENTIAL DUTIES, FUNCTIONS AND RESPONSIBILITIES:**

- Tutors are expected to provide direct instruction under the supervision of a certified teacher ~~in specified subjects~~ to identified students. This responsibility is designated by the ~~supervisor~~, special education case manager, building administrator and/or Director of ~~Special~~ Pupil Services.
- A building level special education teacher will ~~be assigned to~~ supervise each Tutor.
- The tutor will collaborate with the special education teacher and general education teachers to identify academic and behavioral supports to address IEP goals and objectives.
- The tutor will provide individualized instruction under the guidance of the special education teacher.
- The tutor will work in conjunction with the special education teacher to promote a positive learning environment that builds students confidence and promotes academic success.
- The tutor will receive Safety Care training which includes best practices in de-escalation, ABA practices, and the use of restraint and seclusion.
- The tutor will support certified staff in Safety Care procedures as directed.
- The tutor will be responsible for collecting data under the supervision of the teacher on academic and behavioral goals.
- The tutor will maintain clear communication
- ~~Contact with the supervising teacher will be made weekly to discuss student progress, instructional expectations, grading and lesson plans.~~
- School rules as outlined in the student handbooks are to be reinforced. Any problems should be reported to the building Principal/Assistant Principal.

- ~~Student attendance will be recorded daily and shared with the tutor's supervisor at the end of each month.~~
- ~~Supply requests (such as books, supplemental instructional materials, quizzes, tests, worksheets) should be directed to the supervising teacher.~~
- ~~Each Tutor is hired for a specified number of hours per week.~~
- ~~All student tutoring hours will be scheduled by the Tutor during the established work week hours. Any alteration to this regular schedule will require written prior approval from the building level administrator or Director of Special Services.~~
- ~~Tutoring schedules will follow the Windsor Locks school calendar.~~
- Performs other duties as appropriate and required.

### **Work Schedule**

- Tutors will receive all holidays and non-instructional days (~~or partial days~~) off without pay.
- Tutors are provided a ½ hour duty-free, non-paid lunch when employed full time.
- Tutors will receive two days of professional development over the course of the school year.
- Tutors will work full days on PLC days to collaborate and plan with case managers.
- Tutors will work full days on early release days to collaborate and plan with case managers.

### **SUPERVISORY RESPONSIBILITIES:**

None

### **QUALIFICATION REQUIREMENTS:**

*To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.*

### **EDUCATION AND/OR EXPERIENCE:**

Bachelor's degree or higher.

### **LANGUAGE SKILLS:**

Ability to read and comprehend simple instructions, short correspondence, and memos. Ability to write simple correspondence. Ability to effectively present information in one-on-one and small group situations to clients and other employees of the organization.

### **MATHEMATICAL SKILLS:**

Ability to add, subtract, multiply and divide in all units of measure, using whole numbers,

common fractions and decimals. Ability to compute rate, ratio and percent and to draw and interpret bar graphs.

**REASONING ABILITY:**

Ability to apply common sense understanding to carry out detailed but uninvolved written or oral instructions. Ability to deal with problems involving a few concrete variables in standardized situations. Ability to understand the integrity and confidentiality of certain matters pertaining to the work of the system.

**OTHER SKILLS AND ABILITIES:**

Ability to develop effective working relationships with students, staff, and the school community. Ability to communicate clearly and concisely, both orally and in writing. Ability to perform duties with awareness of all district requirements and Board of Education policies.

**PHYSICAL DEMANDS:**

*The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.*

While performing the duties of this job, the employee is regularly required to reach with hands and arms. The employee frequently is required to stand, walk, sit, and talk or hear. The employee is occasionally required to use hands to finger, handle or feel objects, tools, or controls; climb or balance; and stoop, kneel, crouch, or crawl. The employee may be required to lift 40 pounds and/or push/pull up to 100 pounds. Specific vision abilities required by this job include close vision, distance vision, and peripheral vision. The employee needs to be able to tell where a sound is coming from and hear in a noisy environment.

**WORK ENVIRONMENT:**

*The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.*

While performing the duties of this job, the employee occasionally works near moving mechanical parts in some vocational settings. The noise level in the work environment is usually moderate. The employee is frequently exposed to infection at a greater risk than the average person. May be responsible for the safety, well-being, and/or work output of students.

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*The information contained in this job description is for compliance with the Americans with Disabilities Act (A.D.A.) and is not an exhaustive list of the duties performed for this position. Additional duties are performed by the individuals currently holding this position and additional duties may be assigned.*

**WINDSOR LOCKS PUBLIC SCHOOLS**  
**POSITION DESCRIPTION**

Position Title: Nurse Supervisor  
Department: Special Services  
Reports to: Director of Special Services  
Revised: 7/13/11; June 2024

SUMMARY:

Under the direction of the Director of Special Services and Windsor Locks Board of Education with the advice and consent of the school medical advisor, is responsible for administration and supervision of the nursing services and oversight of the district LPNs in the Windsor Locks school system.

ESSENTIAL DUTIES, FUNCTIONS AND RESPONSIBILITIES:

In addition to the duties of a school nurse, the supervisor:

- Provides direction and supervision for all aspects of the school health program, ensuring compliance with state regulations and board of education policies.
- Schedules nurses and district LPNs.
- Schedules and staffs sports physicals and supports the medical advisor in the actual activity.
- Orders health room supplies for all schools and submits purchase orders for the health services program.
- Provides yearly performance evaluations and professional development opportunities to nurses and LPNs.
- Presents annual budget to the Director of Pupil Services.
- Provides consultation to school administrators on student health issues, including protocols for handling emergencies, the administration of medicine during the school day and managing chronic conditions.
- ~~Provides and/or coordinates training to principals, teachers and other licensed nursing personnel in the administration of medications. Supports and assists other licensed nursing personnel, principals, and teachers in preparing for and implementing their responsibilities relating to the administration of specific medications during school hours and observes medication administration by licensed nursing personnel, principals, and teachers who have been newly trained.~~
- Notifies the principals of any students not properly immunized or of emergencies and other atypical or necessary happenings.
- Develops and implements health policies and procedures in collaboration with school administration, the school medical advisor, and the board of education.
- Prepares activity and related reports for the Superintendent and Director of Pupil Services, as necessary.
- Assists in recruitment, interviews, and hiring of qualified nursing staff.
- Assists in the recruitment and training of substitutes for nurses.

- Assists in the improvement of a district-wide program of safety education and accident prevention.
- Makes recommendations for the improvement of health services for regular as well as special needs pupils.
- Performs such duties as are customarily related to the position of school nurse supervisor and school nurse.
- Performs other duties as appropriate and required.

#### SUPERVISORY RESPONSIBILITIES:

Nursing and health aide staff

#### QUALIFICATION REQUIREMENTS:

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

#### EDUCATION AND/OR EXPERIENCE:

BSN degree preferred. Minimum of five years of experience as a school nurse, with supervisory experience preferred. License to practice nursing. R.N. and qualifications as a school nurse in accordance with State requirements.

#### LANGUAGE SKILLS:

Ability to read, analyze and interpret health periodicals, professional journals, technical procedures and governmental regulations. Ability to write reports, business correspondence, health notes, and procedure manuals. Ability to effectively present information and respond to questions from groups of administrators, students, staff and the general public.

#### REASONING ABILITY:

Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form. Ability to understand the integrity and confidentiality of certain matters pertaining to the work of the system.

#### OTHER SKILLS AND ABILITIES:

Pleasant personality. Capable of administering program and working well with subordinate staff and the ability to relate to various levels within an organization as well as various organizations. Considerate and sensitive to the needs of students.

#### PHYSICAL DEMANDS:

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is regularly required to sit, stand, walk and talk or hear. The employee is occasionally required to run, stoop and kneel. The employee must occasionally lift and/or move up to 50 pounds. The employee must occasionally push items of 50 pounds such as pushing children on a bike or moving/rearranging furniture. While performing the duties of the job, the employee occasionally may visit a child's home. Specific vision abilities required by this job include close vision, distance vision and depth perception.

#### WORK ENVIRONMENT:

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

The noise level in the work environment is usually loud and is a standard acceptable level for this environment. Is directly responsible for students safety, work output and well-being.

*The information contained in this job description is for compliance with the Americans with Disabilities Act (A.D.A.) and is not an exhaustive list of the duties performed for this position. Additional duties are performed by the individuals currently holding this position and additional duties may be assigned.*

## **WINDSOR LOCKS PUBLIC SCHOOLS**

### **POSITION DESCRIPTION**

**Position Title: Executive Assistant to the Superintendent**

**Department: Central Administration**

**Reports to: Superintendent**

Revised: October 11, 2002 **August 2024**

#### **SUMMARY:**

To provide administrative assistance for the Superintendent and to maintain the confidential nature and integrity of the Superintendent/

Central Office and Board of Education.

The Executive Assistant is responsible to the Superintendent of Schools for professional assistance in the general administration of the Superintendent's responsibilities. The person holding this position shall advise the Superintendent and make recommendations/suggestions to the Superintendent regarding Central Office organization, procedures, and functions on all levels, including the schools. In addition, this person shall work within local, state and federal statutes and regulations; Board of Education policies; and regulations and directives of the Superintendent of Schools.

#### **ESSENTIAL DUTIES, FUNCTIONS AND RESPONSIBILITIES:**

- I. Serve as Executive Assistant to the Superintendent:
  - Maintain confidentiality and integrity of the Central Office, Superintendent, Board of Education and the Windsor Locks Public Schools. The Executive Assistant will be the support for the Superintendent in the following areas:
    - A. Board of Education
      - Communications including agenda publication and Board Packets.
      - Confidential negotiations with bargaining units.
      - Acting Board of Education Recording Secretary, **in the absence of that person**
      - Student Affairs
      - Public/Parent Concerns
      - Control of access to secured files
      - All other matters deemed to be confidential
    - B. Coordinate, Schedule, and assist the Superintendent in all activities.
      - Maintain and coordinate Superintendent's calendar and schedule.
      - Screen and receive incoming telephone calls to the Superintendent and Board of Education



- Screen and compose drafts to routine mail directed to the Superintendent and Board of Education, pending the approval of the Superintendent.

C. Communications

- Under the direction of the Superintendent of Schools, draft routine and responsive letters for signature

D. Maintain and update files for Superintendent's office, including state reports.

E. Serve as a Central Office Liaison to School Office Personnel.

F. Miscellaneous projects as assigned by the Superintendent.

G. Compose and publish district publications, under the direction of the Superintendent.

II. Perform Operational Duties Connected with the Superintendent's Office

A. General Knowledge of Budget

- Work under the direction of the Superintendent ~~and Business Manager~~ in developing the ~~budget and the~~ presentation of the budget to the Board of Education and Board of Finance
- Distribute budget documents to Board of Education members and Board of Finance members.

B. ~~State and Federal Reports~~

- ~~Independently complete and assist in the completion of a variety of government reports.~~
- ~~Review and route other government reports to proper personnel for completion along with due dates.~~

C. ~~Coordinate and Draft Annual Report~~

- ~~Appraise administrators, Board of Education recording secretary, and Superintendent of time lines for report~~
- ~~Proofread and format individual reports~~
- ~~Update information regarding teachers and staff~~
- ~~Update school calendar information~~
- ~~Gather all necessary information from appropriate sources/organize and compose draft of report~~

D. General Function of the Central Office

- Maintain petty cash account
- Contribute to maintenance of a pleasant working environment
- Update Superintendent on Central Office operations

E. Special Responsibilities

- Act as intermediary between the Superintendent and certified staff, non-certified staff, administrators and legal counsel, parents, students, government officials, town officials, as well as the general public

- Assist in maintaining the image of the school system by being professional, affable, and helpful to all with whom contact occurs.

III. Performs other appropriate duties as assigned by the Superintendent

**SUPERVISORY RESPONSIBILITIES:**

~~Clerical Aide-Superintendent's Office~~ Temporary or seasonal staff as assigned.

**QUALIFICATION REQUIREMENTS:**

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**EDUCATION AND/OR EXPERIENCE**

- Associates Degree with three to five years experience in the business/education field or an equivalent combination of experience and training as determined by the Superintendent.
- Familiarity with current computer systems, including Word, Excel, Power Point, Access, and Publisher, Powerschool, Microsoft TEAMS, Infinite Visions and related software
- General knowledge of office procedures and related equipment
- Ability to maintain a high-level of confidentiality
- Proven ability to exercise professional judgment and attitude in dealing with staff members and the public.
- Proven ability to interact as an office team member with potential leadership qualities.
- Initiative and creativity.

**LANGUAGE SKILLS:**

Ability to read and interpret documents such as safety rules, operating and maintenance instructions and procedures manuals. Ability to create routine and complex reports and correspondence and publications. Ability to disseminate information and answer questions from students, staff and parents. Ensure proper telephone techniques and etiquette are always in place.

Multilingual (Spanish) preferred.

**REASONING ABILITY:**

Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram or schedule form. Ability to understand the integrity and confidentiality of certain matters pertaining to the work of the system.

**OTHER SKILLS AND ABILITIES:**

- Multi-task oriented and able to perform calmly and accurately in a stressful, high paced environment.
- Must have strong communication, computer and interpersonal skills.
- Must have ability to learn and utilize new software programs as systems are upgraded.
- ~~Typing and shorthand required (or transcription experience)~~–Must pass a typing test of 55 words per minute.
- Ability to apply knowledge of current research and theory in specific field.
- Ability to establish and maintain effective working relationships with students, staff, **Board of Education Members** and the school community.
- Ability to communicate clearly and concisely, both orally and in writing.
- Ability to perform duties with awareness of all district requirements and Board of Education policies.

### **PHYSICAL DEMANDS:**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is regularly required to sit and talk or hear. The employee frequently is required to walk and use fingers, tools or controls. The employee is occasionally required to stand and reach with hands or arms. Specific vision abilities required by this job include close vision. The employee must be able to transport from building to building for meetings.

### **WORK ENVIRONMENT:**

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

The noise level in the work environment is usually quiet.

The information contained in this job description is for compliance with the Americans with Disabilities Act (A.D.A.) and is not an exhaustive list of the duties performed for this position. The individuals currently holding this position perform additional duties and additional duties may be assigned.

**WINDSOR LOCKS PUBLIC SCHOOLS**  
**POSITION DESCRIPTION**

**Position Title:** Tutor - ELL  
**Department:** Special Services/Curriculum Department  
**Reports to:** Director of Special Services and Director of C.I.A.  
**Revised:** 10/07 August 2024

**SUMMARY:**

To provide ongoing educational programs to children in the district, including ELL, special education, and homebound instruction.

**ESSENTIAL DUTIES, FUNCTIONS AND RESPONSIBILITIES:**

1. Responsible for assisting the ELL teacher in identifying all ELL students.
2. Responsible for direct instruction in language acquisition and support for content areas.
3. Responsible for communicating and collaborating with regular classroom teachers.
4. Devises, with the advice of the student's general education teacher or teachers, an instructional program for each assigned student.
- ~~5. Responsible for conducting annual evaluations and reviews.~~
6. Responsible for completing Individualized Service Plans (ISPs), report cards, CST/PPT/EIP forms and other necessary paperwork in a timely and accurate fashion **in collaboration with staff.**
- ~~7. Files written progress reports on each assigned student with the student's general education teacher(s).~~
8. Responsible for communicating with parents of ELLs.
9. Attend quarterly ELL Consortium meetings.
10. Attend ELL meetings within district (dates to be determined by ELL teacher).
11. Responsible for helping ELL Teacher with other ELL tasks.
12. Meets with each assigned student on a regularly-scheduled basis for the purpose of providing instruction.
13. Assumes responsibility for obtaining textbooks and other teaching materials necessary through the procedures established.
14. Keeps, maintains, and files such reports and records as the Director of Special Services, Director of Curriculum, Instruction and Assessment or ELL Teacher may require, including attendance reports, and the like.
15. Acquires a personal acquaintance with the student's parents or guardians and works to establish with them an understanding and cooperative relationship based on the student's individual needs.
16. Works cooperatively with members of the Special Services and pupil personnel teams as appropriate.
17. Performs other duties as appropriate and required.

**SUPERVISORY RESPONSIBILITIES:**

None

**QUALIFICATION REQUIREMENTS:**

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**EDUCATION AND/OR EXPERIENCE:**

Bachelor Degree or higher.

**LANGUAGE SKILLS:**

Ability to read and comprehend simple instructions, short correspondence and memos. Ability to write simple correspondence. Ability to effectively present information in one-on-one and small group situations to clients and other employees of the organization.

**Bilingual (Spanish) preferred.**

**MATHEMATICAL SKILLS:**

Ability to add, subtract, multiply and divide in all units of measure, using whole numbers, common fractions and decimals. Ability to compute rate, ratio and percent and to draw and interpret bar graphs.

**REASONING ABILITY:**

Ability to apply common sense understanding to carry out detailed but uninvolved written or oral instructions. Ability to deal with problems involving a few concrete variables in standardized situations. Ability to understand the integrity and confidentiality of certain matters pertaining to the work of the system.

**OTHER SKILLS AND ABILITIES:**

Ability to develop effective working relationships with students, staff and the school community. Ability to communicate clearly and concisely, both orally and in writing. Ability to continually learn new technological skills. Ability to perform duties with awareness of all district requirements and Board of Education policies.

**PHYSICAL DEMANDS:**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is regularly required to reach with hands and arms. The employee frequently is required to stand, walk, sit and talk or hear. The employee is occasionally required to use hands to finger, handle or feel objects, tools or controls; climb or balance; and stoop, kneel, crouch, or crawl. The employee may be required to lift 40 pounds and/or push/pull up to 100 pounds. Specific vision abilities required by this job include close vision, distance vision, and peripheral vision. The employee needs to be able to tell where a sound is coming from and hear in a noisy environment.

**WORK ENVIRONMENT:**

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee occasionally works near moving mechanical parts in some vocational settings. The noise level in the work environment is usually moderate. The employee is frequently exposed to infection at a greater risk than the average person. May be directly responsible for the safety, well-being and/or work output of students.

*The information contained in this job description is for compliance with the Americans with Disabilities Act (A.D.A.) and is not an exhaustive list of the duties performed for this position. Additional duties are performed by the individuals currently holding this position and additional duties may be assigned.*

**WINDSOR LOCKS PUBLIC SCHOOLS  
POSITION DESCRIPTION**

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**Position Title: School Climate Coordinator**

Department: Central Office

Reports to: Superintendent

Revised: July 2024 **Draft start for 2025**

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**1 BROAD FUNCTIONS:**

The School Climate Coordinator must assure that the District is in compliance with the state and federal regulations **and implement the District's Climate Improvement Plan.**

**2 ESSENTIAL DUTIES, FUNCTIONS AND RESPONSIBILITIES:**

1. Providing district-level leadership and support for the implementation of the ~~school~~ **District eClimate i**Improvement ~~p~~**Plan** for each school;
2. Collaborate with the school climate specialists for each school, **the Superintendent, and the Board** to prevent, identify and respond to inappropriate behavior;
3. Collect and maintain data **and information derived from the school climate assessments, in collaboration with the Superintendent,** regarding school climate improvement and restorative practices for the purposes of tracking continued improvement;
4. Meet with the school climate specialists for each school at least twice during the school year to:
  - (A) identify strategies to improve school climate and implement restorative practices
  - (B) propose recommendations for revisions to the ~~school~~ **District eClimate i**Improvement ~~p~~**Plan**
  - (C) assist with the completion of the **district and** school climate surveys;
5. Performs other duties as appropriate and required.

**3 SUPERVISORY RESPONSIBILITIES:**

None

**4 QUALIFICATION REQUIREMENTS:**

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**5 EDUCATION AND/OR EXPERIENCE:**

~~Administrator~~ **Experience as a building administrator.**

**6 LANGUAGE SKILLS:**

Ability to read and interpret documents such as safety rules, operating and maintenance instructions, and procedure manuals. Ability to write routine reports and correspondence. Ability to speak effectively before employees of organization. Ability to utilize proper telephone etiquette.

**Bilingual (Spanish) preferred**

**7 MATHEMATICAL SKILLS:**

Ability to add, subtract, multiply and divide in all units of measure, using whole numbers, common fractions and decimals. Ability to compute rate, ratio and percent and to draw and interpret bar graphs.

**8 REASONING ABILITY:**

Ability to apply common sense understanding to carry out detailed but uninvolved written or oral instructions. Ability to deal with problems involving a few concrete variables in standardized situation.

Ability to understand the integrity and confidentiality of certain matters pertaining to the work of the system.

**9 OTHER SKILLS AND ABILITIES:**

Ability to operate a personal computer and related software. Ability to lead a team in establishing and achieving goals. Strong communication skills, both written and oral. Organizational and management skills, with appreciation for attention to detail. Commitment of and ability to facilitate cooperation within a team and between academic areas. Knowledge of and commitment to effective instructional strategies. Ability to perform duties with awareness of all district requirements and Board of Education policies.

**10 LENGTH OF APPOINTMENT:**

Continuous based upon satisfactory evaluation.

**11 PHYSICAL DEMANDS:**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**12 WORK ENVIRONMENT:**

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

The noise level in the work environment is usually moderate. The employee is continuously interacting with the public, staff and students.



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*The information contained in this job description is for compliance with the Americans with Disabilities Act (A.D.A.) and is not an exhaustive list of the duties performed for this position. Additional duties are performed by the individuals currently holding this position and additional duties may be assigned.*

**WINDSOR LOCKS PUBLIC SCHOOLS  
POSITION DESCRIPTION**

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**Position Title: School Climate Specialist**

Department:

Reports to: School Principals

Revised: July 2024 – **Draft start for 2025**

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**1 BROAD FUNCTIONS:**

The School Climate Specialist must assure that the school is in compliance with the state and federal regulations **and lead the implementation of the school climate improvement plan.**

**2 ESSENTIAL DUTIES, FUNCTIONS AND RESPONSIBILITIES:**

1. Act as the primary school official responsible for preventing, identifying and responding to inappropriate behavior, including but not limited to reports of alleged bullying, harassment, and teen dating violence reports in the school
2. Identification and response to inappropriate behavior, including, but not limited to, reports of alleged bullying, ~~and~~ harassment, and teen dating violence reports;
3. Collect and maintain records of reports and investigations of inappropriate behavior, including but not limited to alleged bullying, harassment, and teen dating violence in the school;
4. Implementing restorative practices;
5. Scheduling meetings for and leading the school climate committee;
6. Leading the implementation of the school climate improvement plan;
7. Performs other duties as appropriate and required.

**3 SUPERVISORY RESPONSIBILITIES:**

None

**4 QUALIFICATION REQUIREMENTS:**

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**5 EDUCATION AND/OR EXPERIENCE:**

Certification as a teacher in designated area.

**6 LANGUAGE SKILLS:**

Ability to read and interpret documents such as safety rules, operating and maintenance instructions, and procedure manuals. Ability to write routine

reports and correspondence. Ability to speak effectively before employees of the organization. Ability to utilize proper telephone etiquette.  
Bilingual (Spanish) preferred

**7 MATHEMATICAL SKILLS:**

Ability to add, subtract, multiply and divide in all units of measure, using whole numbers, common fractions and decimals. Ability to compute rate, ratio and percent and to draw and interpret bar graphs.

**8 REASONING ABILITY:**

Ability to apply common sense understanding to carry out detailed but uninvolved written or oral instructions. Ability to deal with problems involving a few concrete variables in standardized situations.

Ability to understand the integrity and confidentiality of certain matters pertaining to the work of the system.

**9 OTHER SKILLS AND ABILITIES:**

Ability to operate a personal computer and related software. Ability to lead a team in establishing and achieving goals. Strong communication skills, both written and oral. Organizational and management skills, with appreciation for attention to detail. Commitment of and ability to facilitate cooperation within a team and between academic areas. Knowledge of and commitment to effective instructional strategies. Ability to perform duties with awareness of all district requirements and Board of Education policies.

**10 LENGTH OF APPOINTMENT:**

Continuous based upon satisfactory evaluation.

**11 PHYSICAL DEMANDS:**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**12 WORK ENVIRONMENT:**

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

The noise level in the work environment is usually moderate. The employee is continuously interacting with the public, staff and students.

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*The information contained in this job description is for compliance with the Americans with Disabilities Act (A.D.A.) and is not an exhaustive list of the duties performed for this position. Additional duties are performed by the individuals currently holding this position and additional duties may be assigned.*

**WINDSOR LOCKS PUBLIC SCHOOLS**

**POSITION DESCRIPTION**

**Position Title:** ~~Director of Guidance~~ Director of School Counseling  
**Department:** ~~Guidance~~ School Counseling  
**Reports to:** Building Principal  
**Revised:** ~~11/07~~ 8/24

**1 BROAD FUNCTIONS:**

In addition to the primary function of the ~~guidance counselor~~ school counselor and all ~~guidance counselor~~ school counselor responsibilities and duties, the ~~Director of Guidance~~ Director of School Counseling will be involved in the following major responsibilities under the direction of the principal. This is a teacher plus stipend position. The stipend is based on the teacher's daily rate for up to 12 additional days.

**2 ESSENTIAL DUTIES, FUNCTIONS AND RESPONSIBILITIES:**

**A DEPARTMENT COORDINATION:**

1. Directs and coordinates the work of ~~guidance counselors~~ school counselors and ~~guidance secretary~~ administrative assistant; conducts department meetings.

**B REGISTRATION OF STUDENTS: Administrative assistant will inform the Team Leader about the transfer student. Based on where the student falls on the alphabet, the administrative assistant will assign the student to the appropriate school counselor.**

1. Registers all new and transfer students. Support administrative assistant with new student registrations
2. Orients new students to school services, policies and procedures and provides with a Student Handbook. Support school counselors with communicating information to transfer students. Give the student and family the new student welcome packet.

**C Student Course Selection and Scheduling:**

1. Provides recommendation forms to teachers in sequential courses.

2. Organizes recommendation forms for use by counselors in student course selection.
3. ~~Cooperates with the administration in revising "Program of Studies" booklet.~~ Works with administration on reviewing and revising the program of studies that is published annually.
4. Assists Principal/Assistant Principal with building Master Schedule.
5. ~~Directs and oversees the ninth grade scheduling process at the Middle School.~~ Works with Windsor Locks Middle School school counselors and respective building principals to plan and implement the 9th grade scheduling process.

D Public Relations:

1. Organizes and supervises junior orientation program for parents.
2. Provides press releases on ~~guidance~~ school counseling activities.
3. ~~Edits and publishes "Guidance Notes" newsletter periodically.~~ In charge of communication through Parent Square
4. Prepares material for publication of school profile ~~and other guidance publications such as college guides.~~
5. ~~Posts Honor Roll each marking period in Guidance Department.~~
6. Prepares year-end report on plans of graduating class.
7. Serves as Chair of the Middle School-High School transition team.
8. Supervises "Moving Step Up Day"; and conducts presentations on school expectations to middle school students.
9. Conducts presentations to the Board of Education regarding various academic programming information.

E Student Records: This has been handled by various departments and employees. Currently, the records have been maintained by the administrative assistant

1. Supervises the Administrative Assistant in the sending of transcripts and school records of students transferred to other schools.
2. Supervises the Administrative Assistant in the sending of requests for transcripts and school records of students transferred to Windsor Locks.

3. ~~Works with Administration in~~ **Monitors monitoring** all graduation requirements based on Board of Education policy.
4. Conducts grade recording and reporting
5. ~~Serves as IPASS technical assistant/IMG liaison for teachers when the Coordinator of Instructional Technology is unavailable.~~

F Testing Program:

1. ~~Organizes and supervises the administration of in-school testing programs; Otis-Lennon, CAPS, Kruder, etc.~~
2. ~~Cooperates~~ **Works** with the Armed Services in scheduling ASVAB test.
3. Organizes and supervises the administration of the College Board Testing program; SAT, PSAT, Advanced Placement.
4. ~~Organizes and supervises State of Connecticut Testing programs.~~

G Preparation of Budget:

1. Prepares ~~Guidance~~ **School Counseling** Department budget for all accounts including testing budget.

H College Visitations:

1. ~~Supervises Coordinates and supervises~~ **the Administrative Assistant in the coordination of** visits of college admissions personnel to the High School.
2. ~~Supervises Publicizes~~ **the Administrative Assistant in the publicizing of** college visits through ~~bulletin board and public address announcements~~ **various platforms.**

**I Special Instructional Programming**

1. ~~Assists the Media Specialist with enrollment for Virtual High School. Confers with various VHS agencies, including CREC.~~
2. Coordinates the Asnuntuck Community College's Tech Prep. And College Connections Programs for Windsor Locks High School students.
3. Serves as liaison to Magnet school programs.

J Scholarship Information:

1. Announces scholarship and award programs as received.

2. ~~Maintains “scholarship box” in the guidance office with up-to-date scholarship information.~~
3. ~~Conducts meetings for seniors eligible for Connecticut State Achievement Grant.~~
4. ~~Publishes booklet of local scholarships.~~
5. ~~Chairs and coordinates the scholarship selection committees.~~
6. ~~Prepares year-end report on scholarship recipients.~~
7. Publicizes financial aid informational programs ~~conducted by Adult Education and local colleges.~~
8. Collaborates with local Dollars for Scholars chapter.

K Summer School Information:

1. Makes summer school information available to students.
- ~~· —Registers all students for summer school.~~
2. Maintains records of students attending summer school.
3. Supervises posting of summer school grades and credits to permanent record.

L State Department of Education Reports:

- Compiles data and complete guidance related state reports such as ED 540, ED 525, and other reports as needed by the Principal.

Performs other duties as appropriate and required.

**3 SUPERVISORY RESPONSIBILITIES:**

None

**4 QUALIFICATION REQUIREMENTS:**

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**5 EDUCATION AND/OR EXPERIENCE:**

Master of Arts degree in counseling, counselor endorsement. Certification as Intermediate Supervisor (092) preferred.



**6 LANGUAGE SKILLS:**

Ability to read, analyze and interpret general business periodicals, professional journals, technical procedures, or governmental regulations. Ability to write reports, business correspondence and procedure manuals. Ability to effectively present information and respond to questions from students, staff and parents. Ability to use proper telephone etiquette.

Bilingual (Spanish) preferred

**7 REASONING ABILITY:**

Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram or schedule form. Ability to understand the integrity and confidentiality of certain matters pertaining to the work of the system.

**8 OTHER SKILLS AND ABILITIES:**

Ability to apply knowledge of current research and theory to instructional program, ability to plan and implement lessons based on division and school objectives and the needs and abilities of students to whom assigned. Ability to establish and maintain effective relationships with students, peers and parents. Skills in oral and written communication.

Ability to perform duties with awareness of all district requirements and Board of Education policies.

**9 PHYSICAL DEMANDS:**

The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is continuously required to sit and talk or hear. Occasionally the employee will repeat the same hand, arm or finger motion many times. The employee must be able to attend meetings in the evening and at other locations. Specific vision abilities required by this job include close vision such as to read handwritten or typed material, and the ability to adjust focus. The position requires the individual to meet multiple demands from several people and interact with the public and other staff.

**10 WORK ENVIRONMENT:**

The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

~~The noise level in the work environment is usually quiet.~~

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION  
FROM: ROBERT A. STACY, DIRECTOR OF HUMAN RESOURCES  
DATE: AUGUST 29, 2024  
RE: PERSONNEL REPORT - UPDATE ON OPEN POSITIONS

The following list of positions are currently open as of August 15<sup>th</sup>. The hiring process is extremely fluid with new hires and resignations happening daily. Hiring Managers are working hard to fill these vacancies on an ongoing basis. Some of these positions are in shortage areas and will be difficult to fill, especially as a result of last minute resignations.

Districtwide

- Director of Finance and Operations
- Housekeepers (5)
- Technology Support Specialist
- Custodian I/HVAC Technician
- Facilities Attendant

High School

- Special Education Teachers (2)
- ParaEducator
- ISS Tutor
- Building Substitutes (2)
- PM Receptionist
- Athletic Coaches (4)

Middle School

- ParaEducator (2)
- Athletic Coach (1)
- Grade 6 Science Teacher (1)

North Street School

- Special Education Teacher
- ParaEducator (2)
- Tutors – General Education (1.5)
- Building Substitutes (2)
- Food Services General Worker

South Elementary School

- Tutor

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION

FROM: ROBERT A. STACY, DIRECTOR OF HUMAN RESOURCES

DATE: AUGUST 29, 2024

RE: PERSONNEL REPORT - DIRECTOR OF FINANCE AND OPERATIONS SEARCH UPDATE

A search committee has been established comprised of the Superintendent, two members of the Board of Education, the Director of Human Resources; the Director of Pupil Services; the High School Principal; the Middle School Assistant Principal; the Principal of South Elementary School; and representatives from both the Teachers Union and the Administrative Assistants Union.

Initial interviews in June did not produce a finalist. The search was reopened and outreach broadened to both traditional and non-traditional candidate pathways.

Candidates were screened and an interview held in August. The interview did not produce a finalist.

The CT Association of School Business Officials (CASBO) has a list of retired business officials to contact for potential interim assignments. We made outreach to everyone on the list. About half did not respond, and the half that did were already involved in interim assignments in other districts.

There are currently 6 CFO/Business Manager vacancies statewide at this time.

The search has again been reopened. We will continue to actively recruit qualified candidates for consideration.

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION  
FROM: ROBERT STACY, DIRECTOR OF HUMAN RESOURCES  
DATE: AUGUST 29, 2024  
RE: POLICY PRIORITY LIST

**August 29, 2024 BOE Meeting**

Second Reading

- 5142.4 School Resource Officer Revision
- 9170 Distribution of Diplomas at HS Graduation New

First Reading

- 0521 Nondiscrimination Mandatory Revise
- 2400 Evaluation of Superintendent Revised
- 3850 Pesticide Management/Application Mandatory/Revise and Renumbered to 3524.1
- 4000.1/4200.1/5145.44 Title IX Mandatory New
- 5145.12 Search and Seizure Revise
- 6141.323 Internet Safety Policy/Filtering New
- 6164.11 Drugs, Tobacco, Alcohol Mandatory/Revise
- 6164.12 Exemption from AIDS Instruction Mandatory/Revise
- 6170 Homework Revise: Renumber to 6154

**September 12, 2024**

- 5121.3 Academic Dishonesty/Plagiarism New
- 5131.911 School Climate Mandatory Revise

**September 26, 2024**

- 4115 Educator & Leader Evaluation and Support New
- 6141.3273 Generative AI (Artificial Intelligence) New
- 6148 FAFSA Completion Program Mandatory Revise

**October 24, 2024**

- 4000 (look at mandated policies for the series and present any needed after review)
- Review any policies from CABE monthly recommended policy packet

**EXHIBIT V**

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION  
FROM: ROBERT STACY, DIRECTOR OF HUMAN RESOURCES  
DATE: AUGUST 29, 2024  
RE: POLICY REVIEW

The following policies are being presented for a **Second Read/Possible Approval** :

- 5142.4 School Resource Officer *Revise*
- 9170 Distribution of Diplomas at High School Graduation *New*

The following policies are being presented for a **First Read/Review**:

- 0521 Nondiscrimination *Mandatory Revise*
- 2400 Evaluation of Superintendent *Revise*
- 3850 Pesticide Application *Mandatory Revise and*  
*Renumber to 3524.1*
- 4000.1/4200.1/5145.44 Title IX *Mandatory New*
- 5145.12 Search and Seizure *Revise*
- 6141.323 Internet Safety Policy/Filtering *New*
- 6164.11 Student Use, Sale or Possession of Alcohol or Controlled Drugs *Mandatory Revise*
- 6164.12 Exemption from AIDS Instruction *Mandatory Revise*
- 6170 Homework *Revise and*  
*Renumber to 6154*

**Possible Board Motion:** “**MOVE** that the Board of Education approve the revision of policy 5142.4 School Resource Officer and approve the new policy 9170 Distribution of Diplomas at High School Graduation as presented.”

## Students

### Safety

#### School Resource Officer

In order to make schools more orderly, safer and secure, the district may employ police officers to deliver security services as school resources officers (SROs).

The utilization of school resource officers in district schools is to accomplish the following goals:

1. Provide a safe learning environment and help reduce school violence.
2. Improve school/law enforcement collaboration.
3. Improve perceptions and relations among students, staff and law enforcement officials.
4. Collaborate with designated members of the school and District staff and with local law enforcement, fire service, public safety and emergency management agencies, and parents/guardians in the development of school safety/crisis plans.

Additionally, School Resource Officers may be involved in:

- Investigating and documenting specific incidents;
- Assisting in identifying, intervening and communicating with at-risk students;
- Provision of crime prevention education;
- Promoting a positive student attitude towards law enforcement;
- Operating as a liaison between the community and the District.

The Superintendent of Schools will develop administrative regulations as necessary to implement this policy.

The Board shall enter into a Memorandum of Agreement (MOA) with the local police department that defines the officer's role and responsibilities. The MOA must address daily interactions among students, school personnel, and police officers, and must include a graduated response model for student discipline. It shall also include a provision requiring all school resource officers to complete, while in the performance of their duties as school resource officers, and during periods when such officers are assigned to be at the school, any separate training specifically related to social-emotional learning and restorative practices provided to district certified employees.

The Board will work in cooperation with the law enforcement agency/police department in the placement of school resource officers in its high/middle/elementary schools. The objectives and qualifications of resource officers will be determined by the police department and shall be subject to approval by the Board.

(cf. [5114](#) - Suspension/Expulsion; Student Due Process)

(cf. [5131](#) - Student Conduct)

(cf. 5131.2 - Assault)

(cf. [5131.21](#) - Terrorist Acts/Threats)

- (cf. 5131.4 - School Grounds Disturbances)
- (cf. 5131.41 - In-School Disturbances)
- (cf. [5131.5](#) - Vandalism)
- (cf. [5131.6](#) - Drugs, Tobacco, Alcohol)
- (cf. 5131.61 - Inhalant Abuse)
- (cf. 5131.612 - Surrender of Physical Evidenced Obtained from Students)
- (cf. [5131.7](#) - Weapons and Dangerous Instruments)
- (cf. [5131.8](#) - Off School Grounds Misconduct)
- (cf. [5131.9](#) - Gang Activity or Association)
- (cf. [5141.6](#) - Crisis Management)
- (cf. [5142](#) - Safety)
- (cf. 5144 - Use of Physical Force)
- (cf. [5145.11](#) - Questioning and Apprehension)
- (cf. [5145.12](#) - Search and Seizure)
- (cf. [5145.121](#) - Vehicle Searches on School Grounds)

Legal Reference: Connecticut General Statutes

[4-176e](#) through [4-180a](#). Contested Cases. Notice. Record.

[10-220](#) Duties of boards of education.

[10-233a](#) through [10-233f](#). Suspension, removal and expulsion of students, as amended by PA 95-304, PA 96-244, and PA 98-139.

[53a-3](#) Definitions.

[53a-217b](#) Possession of Firearms and Deadly Weapons on School Grounds.

PA 94-221 An Act Concerning School Discipline and Safety.

GOALS 2000: Educate America Act, Pub. L. 103-227.

18 U.S.C. 921 Definitions.

Title III - Amendments to the Individuals with Disabilities Education Act.

Sec. 314 (Local Control Over Violence)

Elementary and Secondary Act of 1965 as amended by the Gun Free Schools Act of 1994.

P.L. 105-17 The Individuals with Disabilities Act, Amendment of 1997.

Kyle P. Packer PPA Jane Packer v. Thomaston Board of Education.

**Policy adopted:** April 26, 2018 WINDSOR LOCKS PUBLIC SCHOOLS

**Revised** Windsor Locks, Connecticut

## **Bylaws of the Board**

### **9170 – Distribution of Diplomas at High School Graduation**

The Board of Education (“Board”) believes it is important to recognize students with the presentation of diplomas at High School graduation. Typically diplomas are handed to graduating students by the Board Chairperson. However, at the request of a student, through the High School Principal, another Board Member may be asked to hand out a diploma(s) to individual students that are in the student’s immediate family.

Former Board Members, who served successfully on the Board of Education, may also be requested to hand a diploma(s) to a graduating student if that student is an immediate family member of the former Board Member. This request would also go through the High School Principal.

Adopted:



## Mission Goals Objectives

### Nondiscrimination Policy and Notice

Pursuant to Title IX and its regulations ("Final Rule" released on April 19, 2024), the Windsor Locks Board of Education has adopted and implemented a policy stating that the District does not discriminate on the basis of sex and prohibits sex discrimination in any education program or activity it operates, including admission and employment.

The Windsor Locks Public Schools does not discriminate based on race, color, religion, sex, sexual orientation, gender identity or expression, status as a veteran, status as a victim of domestic violence, marital status, pregnancy or related conditions, national origin, protective hairstyles, alienage, ancestry, age, disability, or any other basis prohibited by law and prohibits discrimination, including harassment, in any education program or activity it operates. The District shall promote nondiscrimination and an environment free of harassment based on an individual's race, color, religion, sex, sexual orientation, gender identity/expression, national origin, ancestry, disability, (including, but not limited to, intellectual disability, past or present history of mental disorder, physical disability or learning disability), genetic information, marital status or age or because of the race, color, religion, sex, sexual orientation, gender identity or expression, national origin, disability, genetic information, marital status or age of any other persons with whom the individual associates or status as a Veteran. The District provides equal access to the Boy Scouts and other designated youth groups.

The Board shall provide protections from all forms of sex-based harassment, including sexual violence and unwelcome sex-based conduct that creates a hostile environment by limiting or denying a person's ability to participate in or benefit from a school's education program or activity.

The District shall take prompt and effective action to end any sex discrimination in its education programs or activities to provide for the prompt and equitable resolution of sex discrimination complaints, prevent recurrence, and remedy its effects. To that end, the District shall act promptly and effectively in response to information about conduct that reasonably may constitute discrimination, including sexual violence and other forms of sex-based harassment. The district shall also ensure that all school employees are trained about their obligations to address sex discrimination and their obligations to notify or provide contact information for the Title IX Coordinator.

The Windsor Locks Board of Education Non-discrimination policy includes protections for students, employees, and applicants against discrimination based on pregnancy, childbirth, termination of pregnancy, lactation, related medical conditions, or recovery from these conditions and shall provide reasonable modifications for students based on pregnancy or related conditions, allow for lactation for employees, and access to a clean, private lactation space for students and employees.

The District shall not disclose personally identifiable information obtained through complying with Title IX, with limited exceptions, such as when there had been prior written consent or when the information is disclosed to the parent of a minor.

Retaliation against anyone who, in good faith, makes a report of harassment or discrimination, files a complaint of harassment or discrimination, serves as a witness, or participates in an

investigation or grievance process is also a violation of the Windsor Locks Board of Education's non-discrimination policy and is prohibited.

The Windsor Locks Public Schools shall notify students, employees, parents, and others of this policy and publish it widely. The Board recognizes that due to size and format restrictions of different publications, to ensure the broadest level of distribution, the Board shall publish a statement (Short Version) that the District prohibits sex discrimination in any education program or activity that it operates and that individuals may report concerns or questions to the Title IX Coordinator and provide a link to the "Long Version" of the non-discrimination notice on the District's website.

**The "Short Version" of the Board's Non-Discrimination statement shall be as follows:**

The Windsor Locks Public Schools prohibits sex discrimination in any educational program or activity that it operates. Individuals are encouraged to report concerns or questions to the Title IX Coordinator. The notice of non-discrimination is located at [www.wlps.org](http://www.wlps.org).

**The "Long Version" of the Board's Non-Discrimination Statement shall be as follows:**

The Windsor Locks Public Schools does not discriminate on the basis of sex and prohibits sex discrimination in any education program or activity it operates, as required by Title IX and its regulations, including admission and employment.

The Windsor Locks Board of Education has designated the following individual(s) to coordinate efforts to comply with and carry out its non-discrimination responsibilities under Title IX (2024's "Final Rule," applicable State laws, and court decisions). Questions regarding the District's non-discrimination commitments, as well as related laws, regulations, and District policies, may be referred to this/these designated employee(s):

**District Title IX Coordinator:**

Robert A. Stacy, Director of Human Resources

58 South Elm Street, Windsor Locks, CT 06096

[rstacy@wlps.org](mailto:rstacy@wlps.org)

(860) 292-5705

**District's Other Designees Under Section 504**

Joshua Robinson, Director of Pupil Services

58 South Elm Street, Windsor Locks, CT 06096

[jvrobinson@wlps.org](mailto:jvrobinson@wlps.org)

(860) 292-5706

The Windsor Locks Public School District is required not to discriminate on the basis of sex by Title IX and its implementing regulations. Inquiries about Title IX may be referred to the District's Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both.

**The U.S. Department of Education's Office for Civil Rights Contact Information:**

U.S. Department of Education

Office for Civil Rights

Lyndon Baines Johnson Department of Education Bldg

400 Maryland Avenue, SW

Washington, DC 20202-1100

OCR@ed.gov

800-421-3481

To report information about conduct that may constitute sex discrimination or make a complaint of sex discrimination under Title IX, please refer to the District website at [www.wlps.org](http://www.wlps.org). Any person may also report sex discrimination, including harassment, using the contact information listed for the Title IX Coordinator.

~~In keeping with requirements of federal and state law, the District strives to remove any vestige of discrimination in employment, assignment and promotion of personnel; in educational opportunities and services offered to students; in student assignment to schools and classes; in student discipline; in location and use of facilities; in educational offerings and materials; in accommodating the public at public meetings; as well as the District website.~~

The Board encourages staff to improve human relationships within the schools and to establish channels through which citizens can communicate their concerns to the administration and the Board.

~~The Superintendent shall appoint and make known the individuals to contact on issues concerning the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1974, Title VI, Title VII, Title IX and other civil rights or discrimination issues. The Board will adopt and the District will publish grievance procedures providing for prompt and equitable resolution of student and employee complaints.~~

~~Federal civil rights laws prohibit discrimination against an individual because he/she has opposed any discrimination act or practice or because that person has filed a charge, testified, assisted or participated in an investigation, proceeding or hearing. ADA further prohibits anyone from coercing, intimidating, threatening or interfering with an individual for exercising the rights guaranteed under the Act.~~

- (cf. [4000.1](#) - Title IX)
- (cf. [4111](#) - Recruitment and Selection)
- (cf. [4111.1/4211.1](#) - Affirmative Action)
- (cf. [4118.11/4218.11](#) - Nondiscrimination)
- (cf. [4118.112/4218.112](#) - Sex Discrimination and Sexual Harassment in the Workplace)
- (cf. [4118.113/4218.113](#) - Harassment)
- (cf. 5145.4 - Nondiscrimination)
- (cf. [5145.5](#) - Sexual Harassment)
- (cf. [5145.51](#) - Peer Sexual Harassment)
- (cf. 5145.52 - Harassment)
- (cf. [5145.6](#) - Student Grievance Procedure)
- (cf. [6121](#) - Nondiscrimination)
- (cf. [6121.1](#) - Equal Educational Opportunity)

Legal Reference: Title VII, Civil Rights Act, 42 U.S.C. 2000e, et seq.

29 CFR 1604.11, EEOC Guidelines on Sex Discrimination.

Title IX of the Educational Amendments of 1972, 20 U.S.C. 1681 et seq.

Title IX Final Rule, May 6, 2020

Age Discrimination in Education Act, 29 U.S.C. §621

Americans with Disabilities Act, 42 U.S.C. §12101

Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §794

Title II of the Genetic Information Act of 2008

Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d et. Seq.

34 CFR Section 106.8(b), OCR Guidelines for Title IX.

Definitions, OCR Guidelines on Sexual Harassment, Fed. Reg. Vol 62, #49, 29 CFR Sec. 1606.8 (a) 62 Fed Reg. 12033 (March 13, 1997) and 66 Fed. Reg. 5512 (January 19, 2001)

20 U.S.C. 7905 (Boy Scouts of America Equal Access Act

Meritor Savings Bank. FSB v. Vinson, 477 U.S. 57 (1986)

Faragher v. City of Boca Raton, No. 97-282 (U.S. Supreme Court, June 26, 1998)

Gebbs v. Lago Vista Indiana School District, No. 99-1866, (U.S. Supreme Court, June 26, 1998)

Davis v. Monro County Board of Education, No. 97-843, (U.S. Supreme Court, May 24, 1999.)

The Vietnam Era Veteran's Readjustment Act of 1974, as amended, 38 U.S.C. §4212

Title II of the Genetic Information Nondiscrimination Act of 2008

Connecticut General Statutes

[46a-51 Definitions](#) [\(as amended by PA 17-127, PA 21-2 and PA 22-82\)](#)

[46a-58](#) Deprivation of rights. Desecration of property. Placing of burning cross or noose on property. Penalty. [\(as amended by PA 17-127 and PA 22-82\)](#)

[46a 60](#) Discriminatory employment practices prohibited. [\(as amended by PA17-127, PA 21-69 and PA 22-82\)](#)

[46a-81a](#) Discrimination on basis of sexual orientation: Definition

[10-15c](#) Discrimination in public schools prohibited. School attendance by five-year olds. (Amended by P.A. 97-247 to include "sexual orientation" and P.A. 11-55 to include "gender identity or expression")

[10 153](#) Discrimination on account of marital status.

[17a-101 Protection of children from abuse.](#)

P.A. 17-127, An Act Concerning Discriminatory Practices Against Veterans, leaves of Absence for National Guard Members”

Public Law 111-256

Meacham v. Knolls Atomic Power Laboratory 128 S.Ct. 2395, 76 U.S.L.W. 4488 (2008)

Federal Express Corporation v. Holowecki 128 S.Ct. 1147, 76 U.S.L.W. 4110 (2008)

Kentucky Retirement Systems v. EEOC 128 S.Ct. 2361, 76 U.S.L.W. 4503 (2008)

Sprint/United Management Co. v. Mendelsohn 128 S.Ct. 1140, 76 U.S.L.W. 4107 (2008)

Bostock v. Clayton County, Georgia, 140 S.Ct. 1731, 2020 WL3146686 (June 15, 2020)

[2024 Amendments to the U.S. Department of Education’s Title IX Regulations \(“Final Rule”\)](#)

**Policy Adopted: March 25, 2024**

**Revised:**

## **Mission-Goals-Objectives**

### **Nondiscrimination**

#### **Grievance Procedure for Section 504 and Title VII Regulations**

The Board of Education does not knowingly condone discrimination on the basis of an individual's race, color, religion, sex, sexual orientation, gender identity/expression, national origin, ancestry, disability, (including, but not limited to, intellectual disability, past or present history of mental disorder, physical disability or learning disability), genetic information, marital status or age or because of the race, color, religion, sex, sexual orientation, gender identity or expression, national origin, disability, genetic information, marital status, status as a Veteran or age of any other persons with whom the individual associates in admission or access to, or treatment, or employment in its programs or activities.

Inquiries regarding compliance, including receipt and investigation of any complaint alleging non-compliance may be directed to the Superintendent of Schools, or in the Superintendent's absence, the ~~Director~~<sup>Supervisor</sup> of Special Services.

### **Definitions**

A "grievance" is a complaint by an employee, or group of employees, or a student or group of students based upon an alleged violation of the provisions of Section 504, or Title VII.

The term "employee" is considered to apply to any employee of the Nutmeg Board of Education. The term "student" is considered to apply to any student enrolled in the Nutmeg Public Schools. The term "teacher" is considered to apply to any teacher employed by the Nutmeg Board of Education. The "teacher", "employee", or "student" may include a group of teachers or a group of employees or a group of students who are similarly affected by a grievance.

An "aggrieved person" is the person or persons making the claim.

The term "days", when used in this article, shall, except when otherwise indicated, mean working days.

### **Purpose**

The purpose of this procedure is to secure, at the lowest possible administrative level, equitable solutions to the problems which may arise under the provisions of Section 504, or Title VII.

The parties agree that these proceedings shall be kept as informal and confidential as may be appropriate at any level of the procedure.

Nothing herein contained shall be construed as limiting the right of the complainant having a problem to discuss the matter informally with any appropriate member of the administration.

Any complainant shall have the right at any time to present any grievance to such persons and through such channels as are designated for that purpose in this article.

## **Time Limits**

Since it is important that grievances be processed as rapidly as possible, the number of days indicated at each level should be considered as a maximum, and every effort should be made to expedite the process. The time limits specified may, however, be extended by mutual agreement in writing.

If a complainant does not file a grievance in writing as provided herein within 30 days after the aggrieved person knew or should have known of the act or condition on which the grievance is based, then the grievance shall be considered waived.

## **Informal Procedure**

Any student, employee or applicant to a program who feels that he/she has been discriminated against on the basis of race, color, national origin, sex, sexual orientation or handicap shall contact the building Principal/supervisor within 30 days of the alleged occurrence to discuss the nature of the complaint.

The Principal/supervisor shall maintain a written record which shall contain the following:

1. Full name and address of complainant.
2. Full name and position of person(s) who allegedly discriminated against the complainant.
3. A concise statement of the facts constituting the alleged discrimination.
4. Dates of the alleged discrimination.

At the time the alleged discrimination complaint is filed, Principal/supervisor shall review and explain the grievance procedures with the complainant and answer any questions. An investigation of the complaint shall begin as soon as practical, but in no case, more than ten (10) working days from the time the complaint was received. Within this time limit, the Principal/supervisor shall meet informally with the complainant and the individual(s) against whom the complaint was lodged and shall provide confidential counseling where advisable and shall finally seek an informal agreement between the parties concerned. Every attempt shall be made to seek a solution and resolve the alleged discrimination complaint at this level.

If the complainant is not satisfied with these initial informal procedures, within twenty (20) school days from the date of the original discussion with the principal/supervisor, more formal procedures may be initiated by the complainant to further explore and resolve the problem.

## **Formal Procedure**

### **1. Level One - School Principal**

If a complainant is not satisfied with the disposition of the problem through informal procedures, he/she may submit his/her claim as a formal grievance in writing to the Principal.

The Principal shall within five (5) days render a decision and the reasons therefore in writing to the complainant, with a copy to the Superintendent of Schools.

### **2. Level Two - Superintendent of Schools**

If the complainant is not satisfied with the disposition of his/her grievance at Level One, or if no decision has been rendered within five (5) days after presentation of the grievance in writing, the complainant may file a written appeal for a hearing by the Superintendent of Schools within five (5) days.

The Superintendent of Schools shall represent the administration at Level Two of the grievance procedure. Within ten (10) days after receipt of the written appeal for a hearing by the Superintendent, the Superintendent shall meet with the complainant for the purpose of resolving the grievance. A full record of such hearing shall be kept by the Superintendent. The Superintendent shall within three (3) days of the hearing render the decision and the reasons therefore in writing to the complainant.

### **3. Level Three - Board of Education**

If the complainant is not satisfied with the disposition of the grievance at Level Two, or if no decision has been rendered within three (3) days after first meeting with the Superintendent, the person may file the grievance again with the Board of Education within five (5) days.

Within fifteen (15) days after receiving the written appeal, the Board shall meet with the complainant for the purpose of resolving the grievance. The decision of the Board shall be rendered in writing within three (3) days.

### **General Provisions**

Decisions rendered at all levels of the formal grievance shall be in writing setting forth the decision and the reasons therefore.

All documents, communications and records dealing with the processing of a grievance shall be filed separately from the existing files of the participants.

Any person may also file a complaint of illegal discrimination with the Office for Civil Rights, Washington, D.C., at the same time he/she files the grievance during or after use of the grievance process, or without using the grievance process at all. If a complaint is filed with the Office for Civil Rights, it must be filed in writing no later than 180 days after the occurrence of the possible discrimination.

The Director of Human Resources is the Title VII, and Section 504 Coordinator and may be contacted at: [RStacy@WLPS.ORG](mailto:RStacy@WLPS.ORG)

Regulation Approved: March 25, 2024



## Administration

### 2400 - Evaluation of Superintendent

The Board of Education and the Superintendent of Schools understand that an effective working relationship is essential to the successful operation of our school district. This relationship is greatly enhanced by an annual review of the Superintendent's diverse responsibilities and performance.

The Superintendent shall be evaluated annually using ~~the C A B E~~ a form that outlines the following areas:

- ~~Overview~~ Relationships with Board of Education
- ~~Curriculum Development~~ Community Relations
- ~~Professional Development~~ Staff and Personnel
- ~~Supervision~~ Business and Support Services
- ~~Budget/Business and Finance~~ Educational Services
- ~~Infrastructure~~ Comprehensive Planning and General Management
- ~~Staff and Personnel~~ Professional and Personal Guidelines
- Policy

The Board and the Superintendent will meet on or before September 30 of each year to discuss goals for the coming year, based on feedback from the previous year's evaluation. The discussion will be held in executive session.

In January, the Superintendent will provide to the Board of Education a written report and presentation on the goals determined in September. This information will provide an opportunity to identify and strategize for new and/or unexpected changes and/or challenges not previously identified. The discussion will be held in executive session.

In May, the Superintendent will provide the Board of Education a written report and presentation, "Year in Review" self-assessment using the ~~C A B E format~~ form attached to this policy as well as information pertaining to the goals set in September. This will provide the documents to be used by the Board of Education in completing a comprehensive and fair evaluation of the Superintendent. With input from all Board of Education members, the evaluation will be conducted in executive session prior to meeting with the Superintendent.

A formal evaluation is completed consisting of a cover letter and the ~~C A B E~~-form attached to this policy and presented and discussed with the Superintendent no later than June 30 of each year by the Board of Education Chair and/or Vice-Chair. A copy of the Superintendent's performance evaluation must be placed in the Superintendent's official personnel file.

Policy Adopted: September 13, 2023

Windsor Locks Public Schools  
Windsor Locks, Connecticut

## Annual Evaluation of Superintendent

### I. Relationships with Board of Education

	5	4	3	2	1	DK	Comments
A. Keeps Board informed on issues, needs, and operation of the school system.							
B. Apprises Board in a prompt and anticipatory manner regarding any exceptions to normal school operations.							
C. Plans agendas and supportive information for Board meetings that permit effective and productive conduct of district affairs.							
D. Provides effective support to the Board through knowledgeable and responsive comments at Board meetings and hearings and provides written information as appropriate.							
E. Maintains liaison between the Board and staff, working toward a high degree of mutual understanding and respect between the staff and the Board.							
F. Promotes a harmonious working relationship with the Board, remaining impartial toward individual Board members.							

**Rating Scale**

**5 = Outstanding**

**4 = Above average**

**3 = Satisfactory**

**2 = Marginal**

**1 = Unsatisfactory**

**DK = Don't know**

II. Community Relations

	5	4	3	2	1	DK	Comments
A. Provides programs to keep community informed concerning district accomplishments and needs.							
B. Provides opportunities to identify community expectations and concerns.							
C. Responds to community, as well as individual, concerns, using appropriate channels for timely resolution.							
D. Represents the schools in the general community and before community organizations.							
E. Gains the confidence and support of the community in the conduct of school district operations.							
F. Encourages parent and community involvement in the schools consistent with Board policies on community relations.							
G. Works cooperatively and effectively with public and private agencies and government leaders at the local and state level.							
H. Works cooperatively and effectively with business and other community leaders within the region.							
I. Develops and maintains cooperative relationships with the news media.							

Rating Scale

5 = Outstanding

4 = Above average

3 = Satisfactory

2 = Marginal

1 = Unsatisfactory

DK = Don't know

**III. Staff and Personnel**

	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>DK</b>	<b>Comments</b>
A. Develops and executes sound personnel procedures and practices.							
B. Administers all Board/employee agreements and Board personnel policies in a fair and impartial manner.							
C. Sees that personnel evaluations policies are well implemented for all employees.							
D. Provides a program for continuing growth and professional development of the staff.							
E. Supports the staff, promotes good staff morale, and has their confidence and respect, while expecting their best effort.							
F. Encourages participation of appropriate staff members and groups in planning and problem solving.							

**Rating Scale**

**5 = Outstanding**  
**4 = Above average**  
**3 = Satisfactory**

**2 = Marginal**  
**1 = Unsatisfactory**  
**DK = Don't know**

**IV. Business and Support Services**

	5	4	3	2	1	DK	Comments
A. Manages resources effectively to carry out the district's educational mission.							
B. Makes budget recommendations for funding which reflect district needs and priorities.							
C. Provides financial reports consistent with good practices.							
D. Supervises development and presentation of annual budget.							
E. Plans for space requirements to meet student enrollment and program needs.							
F. Provides for security and safety in the use of school facilities.							
G. Provides direction to promote a well-maintained appearance of buildings.							
H. Provides for a safe, reliable, and efficient pupil transportation system.							
I. Provides for a nutritious and cost-effective food service program.							

**Rating Scale**

5 = Outstanding	2 = Marginal
4 = Above average	1 = Unsatisfactory
3 = Satisfactory	DK = Don't know

V. Educational Services

	5	4	3	2	1	DK	Comments
A. Plans for an educational program consistent with the educational philosophy, goals, and priorities of the district.							
B. Organizes and plans program of curriculum evaluation and improvement and reports student achievement trends.							
C. Recommends to the Board for its adoption all courses of study, curriculum guides, and textbooks.							
D. Directs the supervision of teachers and administrators in the delivery of instruction.							
E. Reports to the Board and discusses at Board meeting curriculum and instruction topics.							
F. Plans for a comprehensive program of student services, i.e., guidance, social work, psychology.							
G. Plans for involvement of appropriate community agencies in the delivery of services to students.							
H. Provides for a safe, well-disciplined learning environment.							
I. Maintains contact and communication with the student body.							

Rating Scale

5 = Outstanding  
4 = Above average  
3 = Satisfactory

2 = Marginal  
1 = Unsatisfactory  
DK = Don't know

**VI. Comprehensive Planning and General Management**

	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>DK</b>	<b>Comments</b>
A. Interprets and executes the intent of Board policy.							
B. Advises Board on the need for new or revised policy and presents policy to Board.							
C. Develops short and long range plans to solve current problems and meet future need.							
D. Ensures that each school develops improvement plans with prioritized activities and assessment of activities.							
E. Delegates duties and responsibilities when appropriate and monitors follow-up.							
F. Involves school and community personnel in decision making as appropriate.							
G. Coordinates work of the administrative staff and foster development of the administrative team.							
H. Acts on own discretion if action is necessary in any matter not covered by Board policy.							

**Rating Scale**

**5 = Outstanding**  
**4 = Above average**  
**3 = Satisfactory**

**2 = Marginal**  
**1 = Unsatisfactory**  
**DK = Don't know**

VII. Professional and Personal Guidelines

	5	4	3	2	1	DK	Comments
A. Bases positions upon principal and professional judgment without regard to their popularity.							
B. Keeps abreast of current trends in education and management and participates in professional development activities.							
C. Stimulates Board, staff, and community awareness of local, state, and national education issues.							
D. Maintains high standards of ethics, honesty, and integrity in all personal and professional matters.							
E. Demonstrates ability to work effectively with individuals and groups.							
F. Accepts and utilizes constructive criticism for personal and professional growth.							

Rating Scale

5 = Outstanding  
4 = Above average  
3 = Satisfactory

2 = Marginal  
1 = Unsatisfactory  
DK = Don't know



## Non Instructional

### 3524.13850 – Pesticide Management/—Pesticides Application in Schools

The Board of Education believes that structural and landscape pests can pose significant hazards to people, property and the environment. Pests are living organisms such as plants, animals or microorganisms that interfere with human uses for the school site. Strategies for managing pest populations will be influenced by the pest species and the degree to which that population poses a threat to people, property or the environment. Further, the Board also believes that pesticides can also pose hazards to people, property and the environment. The intent of this policy is to ensure the health and safety of students, teachers, staff and all others using district buildings and grounds

The school administration shall adopt and utilize an integrated pest management (IPM) plan for the Windsor Locks Public Schools that is consistent with an applicable model plan provided by the Commissioner of Energy and Environmental Protection and shall amend such plan, as required, from time to time. IPM procedures will determine when to control pests and whether to use mechanical, physical, chemical, cultural or biological means. Chemical controls shall be used as a last resort. The Board of Education (Board) establishes that the school district shall use pesticides only after consideration of the full range of alternatives, including no action, based upon an analysis of environmental effects, safety, effectiveness and costs. The Superintendent and his/her designee shall be responsible to implement IPM procedures and to coordinate communications with members of the staff who are responsible for pest control, such as maintenance personnel and custodians, and hired contractors when utilized by the district to control a pest problem. The Maintenance and Director of Facilities Supervisor shall be designated as the IPM supervisor and shall direct and supervise all IPM procedures to be carried out by assigned custodial staff and/or licensed contractors.

The goal of this pest management program is to manage pests in order to:

- Reduce any potential human health hazard and/or to protect against a significant threat to public safety;
- Prevent loss or damage to school structures or property;
- Prevent pests from spreading in the community or to plant and animal populations beyond the site;
- Enhance the quality of life and to provide a safe and healthy learning environment for students, staff and others.

All district employees who use chemicals to control a pest problem must be trained and shall follow all precautions and application regulations. The District will only employ certified pesticide applicators for any necessary and non-emergency pesticide use in school building or on school grounds. Contractors hired to do this work shall give evidence of appropriate training and certification in the proper use of pesticides. Pest control contractors shall be utilized, when deemed necessary, to inspect for conditions conducive to pest problems and to develop appropriate prevention measures. Pest control contractors will be expected to write recommendations for structural improvements or repairs and housekeeping and sanitation measures required to reduce or prevent recurrence of pest problems.

Someone other than a certified pesticide applicator may apply a pesticide in an emergency to eliminate an immediate human health threat when (1) it is impractical to obtain the services of a certified pesticide applicator and (2) a restricted use pesticide is not used.

Whenever it is deemed necessary to use a chemical substance that school must provide notification to all parents and staff who have registered for advanced notification in conformity with state statutes. The District, prior to any application of pesticide within any building or on school grounds shall provide such notice by electronic mail no later than twenty-four hours prior to the pesticide application. Notices shall also be posted in designated areas at school at least (suggested) forty-eight (48) hours prior to the application, except in emergency situations.

At the beginning of each school year and at the time a student is registered, parents/guardians shall be informed of the District's pest management policy. Those parents/guardians and staff who register a request shall be notified prior to every pesticide application. Parents/guardians who have registered for prior notice shall receive a transmittal of notice by electronic mail no later than twenty-four hours prior to such application. Notice shall be given by any means practicable to school staff who have registered for such notice.

Pesticide applications shall be limited to non-school hours and when activities are not taking place. An emergency application may be made to eliminate a human health threat in any school with students through grade eight as determined by the Superintendent of Schools.

The Superintendent of Schools shall establish regulations to accompany this policy to ensure compliance with state law regarding the application of pesticides in school and on school grounds. Notice of the IPM plan and its related procedures as well as notice of the application of pesticides in school or on school grounds will be provided to staff and parents and guardians of enrolled students in accordance with state law and this policy and its regulations.

#### Legal References:

##### Connecticut General Statutes

———10-231b Pesticide applications at schools; Authorized applicators. Exception, (as amended by P.A. 09-56)

10-231cd Pesticide applications at schools with an integrated pest management plan.

Prior notice (as amended by June 2015 Special Session PA 15-5)

22a-46 Short title: Connecticut Pesticide Control Act

22a-54 Pesticide applicators, certification, classification, notice, fees, reciprocity; financial responsibility; aircraft, tree, public employee applicators

22a-58 Records to be kept by distributors and applicators

23-61a Definitions. Tree protection examining Board within Department of Consumer Protection. Regulations

23-61b Licensing for arboriculture; examination; fees; renewal; suspension, revocation. Nonresidents. Records. Pesticides

PA 09-56 An Act Concerning Pesticide Applications At Child Day Care Centers and Schools

##### Federal law

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 7 U.S. Code 136 et seq.

Policy adopted: March 2007

Revised: October 2019, [September 2024](#)

4000.1

4200.1

5145.44

## **Personnel --Certified/Non-Certified/Students**

### **Sexual Harassment/Title IX**

#### **Prohibition of Sex Discrimination and Sexual Harassment In The Workplace**

*Nondiscrimination Policy, Notices of Nondiscrimination, and Grievance Procedures (under the 2024 Amendments to the U.S. Department of Education's Title IX Regulations)  
Prohibition of Sex Discrimination and Sexual Harassment (Sex-based Harassment) in the Workplace*

#### **Statement of Policy**

Pursuant with 2024's Title IX "Final Rule," The Windsor Locks Public Schools ("the District") prohibits any form of sex-based discrimination or sex-based harassment in all Board of Education ("the Board") programs and activities. All students, staff, and third parties under the Board's authority are expected to follow this policy to maintain a work and educational environment free from sex-based harassment, insults, or intimidation on the basis of sex stereotypes, sex characteristics, sexual orientation, gender identity, and pregnancy or related conditions.

Conduct that may constitute a violation of the Board's policy includes those occurring under the District's education program or activity in the U.S., including conduct that is subject to the District's disciplinary authority. The District shall address matters that create a sex-based hostile environment under its education program and activity, even when some conduct alleged to be contributing to the hostile environment occurred outside the education program or activity or outside the U.S.

Any employee or student who engages in conduct prohibited by this Policy shall be subject to disciplinary action, up to and including termination or expulsion, respectively. Third parties who engage in conduct prohibited by this policy will be subject to other sanctions, which may include exclusion from Board property and/or subject to civil and criminal penalties. All district employees are required to notify the District's Title IX Coordinator when the employee has information about conduct that reasonably may constitute sex discrimination and sex-based discrimination.

The Board shall not adopt or implement a policy/practice/procedure regarding, or discriminating in its education program or activity against any student or employee based on the student's/employee's current, potential, or past parental, family, or marital status that treats students/employees differently on the basis of sex. The District shall ensure that when students or parents tell an employee of a student's pregnancy or related conditions unless the

employee reasonably believes the Title IX Coordinator has been notified, the employee shall promptly provide the Title IX Coordinator's contact information and inform the person that the Coordinator can coordinate specific actions to prevent discrimination and ensure access. The District shall provide the student with information about the District's obligations, reasonable modifications, voluntary access to a separate comparable portion of the program/activity/or voluntary leaves of absence, and lactation space.

The Superintendent of Schools shall develop Administrative Regulations ("Grievance Procedures") implementing this policy in accordance with Title IX, Title VII, and Connecticut law. The Grievance Procedures shall provide for adequate, reliable, and impartial investigation for all sex discrimination complaints, with specific requirements regarding evidence, response, and privacy.

### **Definitions (Referenced in the District's Grievance Procedures)**

**Sex Discrimination:** occurs when an employer refuses to hire, discipline, or discharge any individual or otherwise discriminates against an individual with respect to his, her, their compensation, terms, conditions, or privileges of employment on the basis of the individual's sex or gender identity. Sex discrimination (sex-based discrimination) also occurs when a person, because of the person's sex or gender identity, is denied participation in or the benefits of any education program or activity receiving federal financial assistance.

**Sexual Harassment under Title IX and Connecticut Law:** means conduct on the basis of sex that satisfies one or more of the following:

1. An employee of the Board conditioning the provision of aid, benefit, or service of the Board on an individual's participation in unwelcome sexual conduct. (i.e., quid pro quo) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual;
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Board's education programs or activities. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment; or
3. "**Sexual Assault**" as defined in 20 U.S.C. 1092(f)(6)(A)(v), "**dating violence**" as defined in 34 U.S.C 1229(a)(10), "**domestic violence**" as defined in 34 U.S.C. 12291(a)(8), or "**stalking**" as defined in 34 U.S.C 12291 (a)(30).

**Sexual Harassment under Title VII and Connecticut Law:** means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or

3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

**Title IX Coordinator** is the person designated and authorized to coordinate the District's efforts to comply with its responsibilities under Title IX (2024 Final Rule) and the regulations. If the District has more than one Title IX Coordinator, it must designate one of its Coordinators to retain ultimate oversight over those responsibilities and ensure the District's consistent compliance with its responsibilities under Title IX. As appropriate, the District may delegate, or permit the Title IX Coordinator to delegate specific duties to one or more designees.

**Complainant** means:

1. A student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or its regulations; or
2. A person other than a student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or its regulations and who was participating or attempting to participate in the District's education program or activity at the time of the alleged sex discrimination.

**Complaint** means an oral or written request to the District that objectively can be understood as a request for the District to investigate and make a determination about alleged discrimination under Title IX or its regulations.

**Disciplinary sanctions** mean consequences imposed on a respondent following a determination under Title IX that the respondent violated the District's prohibition on sex discrimination.

**Party** means a complainant or respondent.

**Relevant** means related to the allegations of sex discrimination under investigation as part of these grievance procedures. Questions are relevant when they seek evidence that may aid in showing whether the alleged sex discrimination occurred, and evidence is relevant when it may aid a decision-maker in determining whether the alleged sex discrimination occurred.

**Remedies** means measures provided, as appropriate, to a complainant or any other person the recipient identifies as having had their equal access to the District's education program or activity limited or denied by sex discrimination. These measures are provided to restore or preserve that person's access to the recipient's education program or activity after the District determines that sex discrimination occurred.

**Respondent** means a person who is alleged to have violated the District's prohibition on sex discrimination.

**Retaliation** means intimidation, threats, coercion, or discrimination against any person under Board control, a student, or an employee or other person authorized by the Board to provide aid, benefit, or service under the District's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the person has reported information, made a complaint, testified, assisted, or participated or

refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations.

**Sex-based harassment** is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity, that is:

1. **Quid pro quo harassment.** An employee, agent, or other person authorized by the recipient to provide an aid, benefit, or service under the recipient's education program or activity explicitly or impliedly conditioning the provision of such aid, benefit, or service on a person's participation in unwelcome sexual conduct;

2. **Hostile environment harassment.** Unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from a District education program or activity (i.e., creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:

a. The degree to which the conduct affected the complainant's ability to access the recipient's education program or activity;

b. The type, frequency, and duration of the conduct;

c. The parties' ages, roles within the District's education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;

d. The location of the conduct and the context in which the conduct occurred; and

e. Other sex-based harassment in the District's education program or activity; or

3. **Specific offenses.**

a. Sexual assault meaning an offense classified as a forcible or non-forcible sex offense under the uniform crime system of the Federal Bureau of Investigation;

b. Dating violence meaning violence committed by a person:

i. Who is or has been in a relationship of a romantic or intimate nature with the victim; and

ii. Where the existence of such a relationship shall be determined based on a consideration of the following factors:

1. The length of the relationship;

2. The type of relationship; and

3. The frequency of interaction between the persons involved in the relationship.

- c. Domestic violence meaning felony or misdemeanor crimes committed by a person who:
  - i. Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction of the recipient, or a person similarly situated to a spouse of the victim;
  - ii. Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
  - iii. Shares a child in common with the victim; or
  - iv. Commits acts against youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.
- d. Stalking meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
  - i. Fear for the person's safety or the safety of others; or
  - ii. Suffer substantial emotional distress.

**Supportive measures** means individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

1. Restore or preserve that party's access to the District's education program or activity, including measures that are designed to protect the safety of the parties or a school's educational environment; or
2. Provide support during the District's grievance procedures or during an informal resolution process.

**Confidential employees** are those whose communications are privileged or confidential under federal or state law and whom the District has designated as confidential for the purpose of providing services to persons related to sex discrimination. "**Confidential employees**" are required to explain to any person informing them of conduct that reasonably may constitute sex discrimination (1) their confidential status and circumstances in which they are not required to notify the Title IX Coordinator about conduct that reasonably may constitute sex discrimination; (2) how to contact the Title IX Coordinator and to make a complaint; and (3) that the Title IX Coordinator may be able to offer and coordinate supportive measures and initiate an informal resolution process/investigation. The District shall notify all participants in its program or activity of how to contact confidential employees, if any.

### **Prohibition Against Retaliation**

The District expressly prohibits intimidation, threats, coercion, or discrimination against any person by the District, a student, an employee, or other person authorized by the District to provide aid, benefit, or service under the District's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the person has reported information, made a complaint, testified, assisted or



participated or refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations. When the District has information about conduct that reasonably may constitute retaliation under Title IX or this part, the District will respond promptly and effectively within its Title IX framework.

### **Reporting Sex Discrimination, Sexual Harassment, or Sex-Based Harassment**

The Board expressly encourages victims of sex discrimination, sexual harassment, or sex-based harassment to report such claims. Employees are encouraged to report complaints promptly in accordance with the appropriate process established in the grievance procedures provided in the Administrative Regulations

Employee violations of this Policy will not be permitted and may result in discipline, up to and including termination. Individuals who engage in acts of sex discrimination or sexual or sex-based harassment may also be subject to civil and criminal penalties.

The district administration will provide training to the Title IX Coordinator, those who may serve in the role of investigators, decision-makers, and any person who facilitates an informal resolution process. Training shall include the definition of sex and sex-based discrimination and sexual and sex-based harassment, the scope of the Board's education program and activity, how to conduct an investigation and implement the grievance process, and how to serve impartially, including by avoiding prejudice of the facts at issue, conflicts of interest and bias.

The Administration will periodically provide training to all Board employees on the topic of sex and sex-based discrimination and sexual and sex-based harassment under Title IX, Title VII, and Connecticut law, which includes but not be limited to when reports of discrimination and harassment must be made. The Administration will distribute this Policy and the Administrative Regulations to employees, union representatives, students, parents, and legal guardians and make the Policy and the Administrative Regulations available on the Board's website to promote an environment free from sex and sex-based discrimination and sexual and sex-based harassment. Administration will make the training materials used to provide these trainings publicly available on the Board's website.

The District Title IX Coordinator is Robert A. Stacy, Director of Human Resources. Any individual may make a report of sex and sex-based discrimination and/or sexual and sex-based harassment to the Title IX Coordinator using any one or multiple of the following points of contact:

- Office Address      58 South Elm Street, Windsor Locks, CT 06096
- Email Address      rstacy@wlps.org
- Phone Number      (860) 292-5705

Any Board employee in receipt of allegations of sex or sex-based discrimination or sexual or sex-based harassment or in receipt of a formal complaint shall immediately forward such information to the Title IX Coordinator. Board employees may also make a report of sex or sex-based discrimination or sex-based harassment to the U.S. Department of Education:

Office of Civil Rights, Boston Office, U.S. Department of Education, 8th Floor, 5 Post Office Square, Boston, MA 02109-3921 (Telephone: 617-289-0111).

Employees may also report sex or sex-based discrimination and/or sexual or sex-based harassment to the Connecticut Commission on Human Rights and Opportunities, 450 Columbus Boulevard, Hartford, CT 06103-1835 (Telephone: 860-541-3400 or Connecticut Toll-Free Number: 1-800-477-5737).

### **Notice of Non-Discrimination**

The Windsor Locks Board of Education (the "Board") is obligated to provide an educational environment free from discrimination on the basis of sex and, therefore, prohibits any form of sex discrimination in any education program or activity that it operates, pursuant to Title IX (Final Rule, August 1, 2024). Therefore, the Board assigns the task of providing a notice of nondiscrimination to the Superintendent of Schools. Such discrimination or harassment prohibition includes students, staff, or third parties under the Board's authority.

This notice is to be disseminated to students, parents, guardians, or other authorized legal representatives of elementary school and secondary school students, employees, applicants for employment, and all unions and professional organizations holding bargaining agreements with the District.

In addition to the above attestation, the notice of nondiscrimination shall direct all inquiries regarding Title IX to the District Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both. This notice shall include the name and title, office address, email address, and telephone number of the District Title IX Coordinator. This notice shall also include that the District's nondiscrimination policy and grievance procedures can be located at (include the link and location(s) to the District website). Finally, the notice shall include language that encourages those needing to report information about conduct that may constitute sex discrimination or make a complaint of sex discrimination under Title IX.

To ensure full compliance, the Superintendent shall prominently include all elements of the Board's notice of nondiscrimination on the District website and in each handbook, catalog, announcement, bulletin, and application form that the District makes available to people entitled to notice or which are otherwise used in connection with the recruitment of employees. Minimally, such notice shall be covered in the following statement:

*Pursuant to Title IX's 2024 Final Rule, the Windsor Locks Public School District does not discriminate on the basis of sex and prohibits sex discrimination in any educational program or activity that it operates, as required by Title IX and its regulations, including in admission and employment.*

*Inquiries about Title IX may be referred to the Windsor Locks Public School District's Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both. The Windsor Locks Public School District Coordinator is Robert A. Stacy and can be reached the following ways:*

*Robert A. Stacy, Director of Human Resources*

*58 South Elm Street, Windsor Locks, CT 06096*

*rstacy@wlps.org*

*(860) 292-5705*

*The Windsor Locks Public School District's nondiscrimination policy and grievance procedures can be located on the website at [www.wlps.org](http://www.wlps.org).*

*To report information about conduct that may constitute sex discrimination or make a complaint of sex discrimination under Title IX, please refer to the district policy.*

*Due to the format or size limitations of various publications, the District may instead include in those publications the information covered in the following statement:*

*The Windsor Locks Public Schools prohibits sex discrimination in any educational program or activity that it operates. Individuals may report concerns or questions to the Title IX Coordinator. The notice of nondiscrimination is located at [www.wlps.org](http://www.wlps.org).*

In developing administrative regulations conforming with 2024's Title IX Final Rule Regulations, the superintendent shall ensure the grievance procedures provide vital protections from all forms of sex-based harassment, including sexual violence and unwelcome sex-based conduct that creates a hostile environment by limiting or denying a person's ability to participate in or benefit from a school's education program or activity.

District schools are required to take prompt and effective action to end any sex discrimination in their education programs and activities, prevent its recurrence, and remedy its effects. To that end, the Board shall require and support the training of employees about the school's obligation to address sex discrimination and the employee's obligation to notify or provide contact information for the Title IX Coordinator.

### **Prohibition Against Retaliation**

The District expressly prohibits intimidation, threats, coercion, or discrimination against any person by the District, a student, an employee, or other person authorized by the District to provide aid, benefit, or service under the District's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the person has reported information, made a complaint, testified, assisted or participated or refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations. When the District has information about conduct that reasonably may constitute retaliation under Title IX or this part, the District will respond promptly and effectively within its Title IX framework.

### **Reporting Sex Discrimination, Sexual Harassment, or Sex-Based Harassment**

The Board expressly encourages victims of sex discrimination, sexual harassment, or sex-based harassment to report such claims. Employees are encouraged to report complaints promptly in accordance with the appropriate process established in the grievance procedures provided in the Administrative Regulations

Employee violations of this Policy will not be permitted and may result in discipline, up to and including termination. Individuals who engage in acts of sex discrimination or sexual or sex-based harassment may also be subject to civil and criminal penalties.

Legal Reference: United States Constitution, Article XIV

Civil Rights Act of 1964, Title VII, 42 U.S.C. §2000 e2(a).

Equal Employment Opportunity Commission Policy Guidance (N 915.035) on Current Issues of Sexual Harassment, Effective 10/15/88.

Title IX of the Education Amendments of 1972, 20 USCS §1681, et seq.

Title IX of the Education Amendments of 1972, 34 CFR §106, et seq.

Title IX Final Rule, 34 CFR §106.45, et seq., May 6, 2020

34 CFR Section 106.8(b), OCR Guidelines for Title IX.

Definitions, OCR Guidelines on Sexual Harassment, Fed. Reg. Vol 62, #49, 29 CFR Sec. 1606.8 (a) 62 Fed Reg. 12033 (March 13, 1997) and 66 Fed. Reg. 5512 (January 19, 2001)

The Clery Act, 20 U.S.C. §1092(f)

The Violence Against Women Act, 34 U.S.C. §12291(a)

Mentor Savings Bank, FSB v. Vinson 477 US.57 (1986)

Faragher v. City of Boca Raton, No. 97-282 (U.S. Supreme Court, June 26,1998)

Burlington Industries, Inc. v. Ellerth, No. 97-569, (U.S. Supreme Court, June 26,1998)

Gebbs v. Lago Vista Indiana School District, No. 99-1866, (U.S. Supreme Court, June 26,1998)

Davis v. Monro County Board of Education, No. 97-843, (U.S. Supreme Court, May 24, 1999.)

Connecticut General Statutes

[46a](#) 60 Discriminatory employment practices prohibited.

Conn. Agencies Regs. §46a-54-200 through §46a-54-207

Constitution of the State of Connecticut, Article I, Section 20.

P.A. 19-16 An Act Combatting Sexual Assault and Sexual Harassment

Title IX, Final Rule, August 1, 2024

**Policy adopted:**

**R4000.1**

**R4200.1**

**R5145.44**

## **Personnel - Certified/Non-Certified/Students**

### **Sexual Harassment/Title IX**

#### **Prohibition of Sex Discrimination and Sexual Harassment in The Workplace**

##### **Grievance Procedures**

Pursuant with 2024 's Title IX "Final Rule," the Windsor Locks Board of Education ("the Board") prohibits any form of sex or sex-based discrimination or sexual or sex-based harassment in its education programs and activities, whether by students, staff, or third parties subject to substantial control by the Board. Discrimination and harassment on the basis of sex include gender identity, sexual orientation, sex stereotypes, sex characteristics, and pregnancy or related conditions. Sex-based harassment includes harassment based on sexual orientation and gender identity and exists when "unwelcome sex-based conduct is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the District's education program or activity.

The District shall maintain an environment free from harassment, insults, or intimidation based on an employee's sex or gender identity and sex and sex-based discrimination. Verbal or physical conduct by a supervisor or co-worker relating to an employee's sex or gender identity that results in creating an intimidating, hostile, or offensive work environment, unreasonably interfering with the employee's work performance, or adversely affecting the employee's employment opportunities is prohibited.

Any employee or student who engages in conduct prohibited by this Board Policy shall be subject to disciplinary action. Any third party who engages in conduct prohibited by this Policy shall be subject to remedial measures, which may include exclusion from school property.

Conduct that may constitute a violation of the Board's policy includes those occurring under the District's education program or activity in the U.S., including conduct that is subject to the District's disciplinary authority. The District shall address matters that create a sex-based hostile environment under its education program and activity, even when some conduct alleged to be contributing to the hostile environment occurred outside the education program or activity or outside the U.S.

Any employee or student who engages in conduct prohibited by this Policy shall be subject to disciplinary action, up to and including termination or expulsion, respectively. Third parties who engage in conduct prohibited by this policy will be subject to other sanctions, which may include exclusion from Board property and/or subject to civil and criminal penalties. All district employees are required to notify the District's Title IX Coordinator when the

employee has information about conduct that reasonably may constitute sex discrimination and sex-based discrimination.

To allow for an appropriate level of discretion and flexibility in accounting for variations in school size, student populations, and administrative structures, the Title IX Coordinator, in consultation with the Superintendent and/or designee(s) shall determine whether or not to use a single-investigator model and to use this model in some but not all cases as long as the grievance procedures clearly state when this model will be utilized. The Title IX Coordinator shall also determine whether or not to offer an informal resolution process for sex discrimination complaints unless the complaint includes allegations that an employee engaged in sex-based harassment of an elementary or secondary school student or unless such a process would conflict with Federal, State, or local law.

## **Definitions**

**Sex Discrimination:** occurs when an employer refuses to hire, discipline, or discharge any individual or otherwise discriminates against an individual with respect to his, her, their compensation, terms, conditions, or privileges of employment on the basis of the individual's sex or gender identity. Sex discrimination (Sex-Based Discrimination) also occurs when a person, because of the person's sex or gender identity, is denied participation in or the benefits of any education program or activity receiving federal financial assistance.

**Sexual Harassment under Title IX and Connecticut Law:** means conduct on the basis of sex that satisfies one or more of the following:

1. An employee of the Board conditioning the provision of aid, benefit, or service of the Board on an individual's participation in unwelcome sexual conduct. (i.e., quid pro quo) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual;
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Board's education programs or activities. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment; or
3. "**Sexual Assault**" as defined in 20 U.S.C. 1092(f)(6)(A)(v), "**dating violence**" as defined in 34 U.S.C 1229(a)(10), "**domestic violence**" as defined in 34 U.S.C. 12291(a)(8), or "**stalking**" as defined in 34 U.S.C 12291 (a)(30).

**Sexual Harassment under Title VII and Connecticut Law:** means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or

3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

**Title IX Coordinator** is the person designated and authorized to coordinate the District's efforts to comply with its responsibilities under Title IX (2024 Final Rule) and the regulations. If the District has more than one Title IX Coordinator, it must designate one of its Coordinators to retain ultimate oversight over those responsibilities and ensure the District's consistent compliance with its responsibilities under Title IX. As appropriate, the District may delegate, or permit the Title IX Coordinator to delegate specific duties to one or more designees.

**Complainant** means:

1. A student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or its regulations; or
2. A person other than a student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or its regulations and who was participating or attempting to participate in the District's education program or activity at the time of the alleged sex discrimination.

**Complaint** means an oral or written request to the District that objectively can be understood as a request for the District to investigate and make a determination about alleged discrimination under Title IX or its regulations.

**Disciplinary sanctions** mean consequences imposed on a respondent following a determination under Title IX that the respondent violated the District's prohibition on sex discrimination.

**Party** means a complainant or respondent.

**Relevant** means related to the allegations of sex discrimination under investigation as part of these grievance procedures. Questions are relevant when they seek evidence that may aid in showing whether the alleged sex discrimination occurred, and evidence is relevant when it may aid a decision-maker in determining whether the alleged sex discrimination occurred.

**Remedies** means measures provided, as appropriate, to a complainant or any other person the recipient identifies as having had their equal access to the District's education program or activity limited or denied by sex discrimination. These measures are provided to restore or preserve that person's access to the recipient's education program or activity after the District determines that sex discrimination occurred.

**Respondent** means a person who is alleged to have violated the District's prohibition on sex discrimination.

**Retaliation** means intimidation, threats, coercion, or discrimination against any person under Board control, a student, or an employee or other person authorized by the Board to provide aid, benefit, or service under the District's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the person has reported information, made a complaint, testified, assisted, or participated or



refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations.

**Sex-based harassment** is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity, that is:

1. **Quid pro quo harassment.** An employee, agent, or other person authorized by the recipient to provide an aid, benefit, or service under the recipient's education program or activity explicitly or impliedly conditioning the provision of such aid, benefit, or service on a person's participation in unwelcome sexual conduct;

2. **Hostile environment harassment.** Unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from a District education program or activity (i.e., creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:

a. The degree to which the conduct affected the complainant's ability to access the recipient's education program or activity;

b. The type, frequency, and duration of the conduct;

c. The parties' ages, roles within the District's education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;

d. The location of the conduct and the context in which the conduct occurred; and

e. Other sex-based harassment in the District's education program or activity.

3. **Specific offenses.**

a. Sexual assault meaning an offense classified as a forcible or non-forcible sex offense under the uniform crime system of the Federal Bureau of Investigation;

b. Dating violence meaning violence committed by a person:

i. Who is or has been in a relationship of a romantic or intimate nature with the victim; and

ii. Where the existence of such a relationship shall be determined based on a consideration of the following factors:

1. The length of the relationship;

2. The type of relationship; and

3. The frequency of interaction between the persons involved in the relationship.

- c. Domestic violence meaning felony or misdemeanor crimes committed by a person who:
  - i. Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction of the recipient, or a person similarly situated to a spouse of the victim;
  - ii. Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
  - iii. Shares a child in common with the victim; or
  - iv. Commits acts against youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.
- d. Stalking meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
  - i. Fear for the person's safety or the safety of others; or
  - ii. Suffer substantial emotional distress.

**Supportive measures** means individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

1. Restore or preserve that party's access to the District's education program or activity, including measures that are designed to protect the safety of the parties or a school's educational environment; or
2. Provide support during the District's grievance procedures or during an informal resolution process.

**Confidential employees** are those whose communications are privileged or confidential under federal or state law and whom the District has designated as confidential for the purpose of providing services to persons related to sex discrimination. "Confidential employees" are required to explain to any person informing them of conduct that reasonably may constitute sex discrimination (1) their confidential status and circumstances in which they are not required to notify the Title IX Coordinator about conduct that reasonably may constitute sex discrimination; (2) how to contact the Title IX Coordinator and to make a complaint; and (3) that the Title IX Coordinator may be able to offer and coordinate supportive measures and initiate an informal resolution process/investigation. The District shall notify all participants in its program or activity of how to contact confidential employees, if any.

**All grievance procedures are required to ensure the following:**

- All schools must treat complainants and respondents equitably.
- Title IX Coordinators, investigators, decision-makers, and facilitators of an **informal resolution process** must not have a conflict of interest or bias for or against complainants or responders generally or an individual complainant or respondent.

- The grievance procedures must include a presumption that the respondent is not responsible for the alleged sex discrimination until a determination is made at the conclusion of the grievance procedures.
- The grievance procedures must require adequate notice to the parties of the allegations, dismissal, delays, meetings, proceedings, and determinations. (All such notifications and records must be in writing with copies maintained at Central Office.)
- The grievance procedures must give the parties an equal opportunity to present and access relevant and not otherwise impermissible evidence and provide a reasonable opportunity for each party to respond to that evidence.
- The decision-maker or the "single investigator" must objectively evaluate each party's relevant and not otherwise impermissible evidence.
- The grievance procedures must enable the decision-maker to assess a party's or witness's credibility when credibility is in dispute and relevant.
- In evaluating the party's evidence, the grievance procedures must use the preponderance of the evidence standard of proof (unless the District uses the clear and convincing evidence standard in all other comparable proceedings, including proceedings relating to other discrimination complaints, in which case the District may use that standard in determining whether sex discrimination occurred).
- The District must not impose disciplinary sanctions under Title IX on any person unless it determines at the conclusion of grievance procedures that sex discrimination for which the person was responsible has occurred.

### **Important Considerations:**

- The District has more than one Title IX Coordinator: one for employees and one for students or other differentiated roles. It is essential that they communicate and collaborate openly and regularly with each other to ensure one Title IX Coordinator remains responsible for all matters related to District Compliance with the implementation of 2024's Title IX Final Rule.
- Schools will use a single investigator model (combining the roles of the investigator and decision maker). Schools may choose to use this model in some but not all cases as long as the grievance procedures clearly state when the District will use it.
- All complaints should be handled immediately and kept at the lowest level.
- Continue to communicate to the "community" where to go and who is responsible for handling Title IX non-discrimination complaints and/or inquiries.
- Documentation is critical: When the complaint was filed/shared, notes from the investigation, whether or not the matter rose or didn't rise to the level of a Title IX violation. Describe what occurred without using "triggering" language. Describe what had occurred. Document how it was determined the matter will not become or continue to be an ongoing issue/concern.

- **Monitor the District Title IX Grievance Procedure to Ensure the Following:**

- o The intake process clearly identifies the initial report obligations of school staff: What is the intake process? Who makes the decision if it's a Title IX matter? What are the staff obligations? Who makes the determination whether or not the reported matter falls under Title IX? What are the time commitments? Who performs the investigation? Who makes the decisions and renders a determination? Who delivers the consequences?

- o When does a matter go beyond the "normal" student bumping into another? How are cases triaged and managed? When does the Title IX Coordinator become involved? How does the District build and ensure consistency among its schools - whatever is determined must be consistently applied?

- o Upon receipt of a complaint or inquiry, immediately respond. Email responses should include the attached policies and procedures.

- o Take all matters seriously. Report them to the correct person. Take immediate action to address conflicts and matters related to "challenging behavior:" (i.e., separate students while the investigation proceeds).

- o Avoid using terms such as "sexually harassed or bullied." Instead, describe the behaviors reported until such determinations can be justified.

- o Focus on setting the correct process in place. Do something. Avoid decision paralysis.

- o Contact the person making the complaint and indicate that you've immediately taken the necessary steps to address the concern. Document those communications.

- o When a parent is required to attend an interview with the child, express that it is important for you to hear from the child directly.

- o Review, document, and make a decision. Consider all factors relevant.

- o The standard of proof to determine whether sex discrimination occurred shall be based upon a "preponderance of evidence" standard unless a "clear and convincing" standard is used in comparable proceedings.

If Windsor Locks Public Schools has knowledge of conduct that reasonably may constitute sex discrimination, including sex-based harassment as defined in this policy in its education program or activity, it will respond promptly and effectively. These procedures apply to a complaint of sex-based harassment in the district's program or activity that includes those occurring on or off school grounds.

As used in these procedures, a "complaint" is an oral or written request to the District that objectively can be understood as a request to investigate and make a determination about alleged discrimination under Title IX or its regulations.

If the Title IX Coordinator reasonably determines conduct as alleged could not constitute sex-based discrimination under Title IX, the Title IX Coordinator is not required to implement the formal procedures under this policy. The reported conduct may, in such cases, be referred to

the appropriate administrator(s) for response under relevant policies and procedures (i.e., personnel policies, student code of conduct, student counseling, other student services, restorative practices, policies governing visitors to district property, technology use policies, etc.)

The Title IX Coordinator may serve as investigator and decision-maker in these procedures. The District requires that any Title IX Coordinator, investigator, or decision-maker not have a conflict of interest or bias for or against complaints or respondents generally or an individual complainant or respondent.

### **Protections for Students, Employees, and Applicants from Discrimination Based on Pregnancy or Related Conditions**

Schools must provide reasonable modifications for students based on pregnancy or related conditions, allow employees reasonable break time for lactation, and provide students and employees with access to a clean, private lactation space.

### **Prohibition Against Retaliation**

The Board prohibits all forms of intimidation, threatening, coercion, or discrimination against someone in order to interfere with their Title IX rights or because they reported sex discrimination, including sexual violence or other forms of sex-based harassment, or participated in, or refused to participate in, the district's Title IX process. The District shall protect students from peer retaliation by other students.

### **The Rights of Parents and Guardians to Act on Behalf of Their Children**

The Board expressly supports parents' and guardians' rights to act on behalf of a minor student, including when seeking assistance under Title IX and participating in a school's Title IX grievance procedures. While it is permissible for parents/legal guardians to attend meetings where their child is interviewed as a witness, complainant, or respondent, the staff member conducting the interview shall ensure the student has the opportunity to provide direct testimony.

### **Ensuring District Communication Regarding its Non-Discrimination Policies and Procedures**

The Board shall require its schools to clearly and effectively inform key people, including students, employees, and applicants, of the District's non-discrimination policies and procedures.

### **Prohibition Against Schools Sharing Personal Information (Confidentiality and Privacy)**

The Board prohibits any of its schools under its jurisdiction from disclosing personally identifiable information they obtain through complying with Title IX, with limited exceptions, such as when they have prior written consent or when the information is disclosed to the parent of a minor. Such consent should be in writing and maintained in secured district areas.

The District shall not disclose personally identifiable information obtained in the course of complying with Title IX, except in the following circumstances:

1. When the district has obtained prior written consent from a person with the legal right to consent to the disclosure;
2. When the information is disclosed to a parent, guardian, or other authorized legal representative with the legal right to receive disclosures on behalf of the person whose personally identifiable information is at issue;
3. To carry out the purposes of Title IX, including action taken to address conduct that reasonably may constitute sex discrimination under Title IX in the District's education program or activity;
4. As required by Federal law, Federal regulations, or the terms and conditions of a Federal award, including a grant award or other funding agreement; or
5. To the extent that such disclosures do not otherwise conflict with Title IX when required by state or local law or permitted under FERPA,

**Privacy During Grievance Process:** The District shall take reasonable steps to protect the privacy of the parties and witnesses during its grievance procedures. These steps shall not restrict the parties' ability to obtain and present evidence, including by speaking to witnesses, consulting with their family members, using confidential resources or advisors, or otherwise preparing for or participating in the grievance procedures.

### **In School Protections from Harm when Students Are Separated or Treated Differently Based on Sex**

Pursuant to Title IX (Final Rule), The Board prohibits separation or treating people differently based on sex in a manner that subjects them to more than de minimis harm, except in limited circumstances permitted by Title IX. The Board further recognizes that preventing someone from participating in school (including in sex-separate activities) consistent with their gender identity causes that person more than de minimis harm. This general nondiscrimination principle applies except in the limited circumstances specified by statute, such as in the context of sex-separate living facilities and sex-separate athletic teams.

### **Child Services or Law Enforcement Reporting**

Nothing in this policy or regulation modifies the District's legal responsibility for reporting child abuse and neglect or violations of the law. In cases where a Child Abuse and Neglect call has been made that concerns conduct that also triggers the District's obligation to respond under Title IX, the Title IX Coordinator will engage as appropriate and legally required with the Department of Children and Families (DCF), law enforcement agencies, and related service agencies as appropriate.

The Title IX response from the District should be integrated with, not replaced by, the DCF response to a report. In cases of law enforcement engagement with conduct reported, the District will coordinate with law enforcement concerning the District's response, including the provision of appropriate Title IX supportive measures to affected parties and the

sequencing of formal Title IX procedures relative to any law enforcement investigatory and adjudicatory process.

### **Special Education/504 Considerations**

If a complainant or respondent is a student with a disability, the Title IX Coordinator must consult with one or more members, as appropriate, the Team responsible for implementing the Student's Individualized Education Program, the Planning and Placement Team (PPT), or one or more members, as appropriate, of the group of persons responsible for the student's placement decision under Section 504, if any, to determine how to comply with the requirements of the District's implementation of grievance procedures and/or supportive measures.

### **Supportive Measures**

As part of promptly and effectively ending any sex-based discrimination in the district's program or activity, preventing its recurrence, and remedying its effect, the District will offer and coordinate supportive measures through the Title IX Coordinator, to complainants as appropriate and, if a grievance has commenced, to the respondent as appropriate.

For complaints of sex-based harassment, these supportive measures may include individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

1. Restore or preserve that party's access to the recipient's education program or activity, including measures that are designed to protect the safety of the parties or the recipient's educational environment; or
2. Provide support during the recipient's grievance procedures or during an informal resolution process.

For allegations of sex discrimination other than sex-based harassment or retaliation, the District's provision of supportive measures does not require the District, its employee, or any other person authorized to provide aid, benefit, or service on the District's behalf to alter the alleged discriminatory conduct during the grievance process for the purpose of providing a supportive measure.

Supportive measures may vary depending on what the District deems to be reasonably available. These Measures may include but are not limited to: counseling; deadline extensions and other course-related adjustments; campus escort services; increased security and monitoring of certain areas of the campus; restrictions on contact applied to one or more parties; leaves of absence; changes in class, work, or extracurricular or any other activity, regardless of whether there is or is not a comparable alternative; and training and education programs related to sex-based harassment.

The district may, as appropriate, modify or terminate supportive measures at the conclusion of the grievance procedures or the informal resolution process, or it may continue them beyond that point.

The District will provide a complainant or respondent with a timely opportunity to seek, from an appropriate and impartial employee, modification or reversal of the District's decision to provide, deny, modify, or terminate supportive measures applicable to them. The reviewing employee must be someone other than the employee who made the challenged decision and must have the authority to modify or reverse the decision if the impartial employee determines that the decision to provide, deny, modify, or terminate the supportive measure was inconsistent with the definition of supportive measures. The District shall also allow a party to seek additional modification or termination of a supportive measure applicable to them if circumstances change materially.

The District will not disclose information about any supportive measures to persons other than the person to whom they apply, including informing one party of supportive measures provided to another party, unless necessary to provide the supportive measure or restore or preserve a party's access to the education program or activity, or when an exception to this policy's prohibition on disclosures of personally identifiable information applies.

If the complainant or respondent is a student with a disability, the Title IX Coordinator will consult with one or more members, as appropriate, of the Team overseeing the student's IEP, if any, or one or more members, as appropriate, of the group of persons responsible for the student's placement decision, if any, to determine how to comply with the requirements of the 504 Plan in the implementation of supportive measures.

### **Complaint Procedures**

The following people have a right to make a complaint of sex discrimination in the program or activity of the District:

1. Any student or district employee;
2. A parent, guardian, or other authorized legal representative with the legal right to act on behalf of a complainant;
3. Any person other than a student or employee who was participating or attempting to participate in the district's education program or activity at the time of the alleged sex discrimination;
4. Title IX Coordinator.

**Limitation on Complaints of Sex-Based Harassment including Hostile Environment:** A person is entitled to make a complaint of sex-based harassment (a sub-category of sex discrimination), including a sex-based hostile environment, only if:

1. They themselves are alleged to have been subjected to the sex-based harassment;
2. They have a legal right to act on behalf of such person; or
3. The Title IX Coordinator initiates a complaint in cases where Title IX permits or requires the Title IX Coordinator to make the complaint.



**District-Initiated Complaints:** In the absence of a complaint or the withdrawal of any or all of the allegations in a complaint, and in the absence or termination of an informal resolution process, the Title IX Coordinator may determine whether to initiate a complaint of sex discrimination that complies with the grievance procedures. To make this fact-specific determination, the Title IX Coordinator must consider, at a minimum, the following factors:

1. The complainant's request not to proceed with the initiation of a complaint;
2. The complainant's reasonable safety concerns regarding the initiation of a complaint;
3. The risk that additional acts of sex discrimination would occur if a complaint is not initiated;
4. The severity of the alleged sex discrimination, including whether the discrimination, if established, would require the removal of a respondent from school grounds or the imposition of another disciplinary sanction to end the discrimination and prevent recurrence;
5. The age and relationship of the parties, including whether the respondent is an employee of the District;
6. The scope of the alleged sex discrimination, including information suggesting a pattern, ongoing sex discrimination, or sex discrimination alleged to have impacted multiple individuals;
7. The availability of evidence to assist the Title IX Coordinator or the assigned Decision-maker in determining whether sex discrimination occurred; and
8. Whether the District could end the alleged sex discrimination and prevent its recurrence without initiating its grievance procedures.

If, after considering these and other relevant factors, the Title IX Coordinator determines that the conduct as alleged presents an imminent and serious threat to the health or safety of the complainant or other person or that the conduct as alleged prevents the District from ensuring equal access on the basis of sex to its education program or activity, the Title IX Coordinator may initiate a complaint.

### **Complaint Consolidation**

The District may consolidate complaints of sex discrimination against more than one respondent, by more than one complainant against one or more respondents, or by one party against another party when the allegations of sex discrimination arise out of the same facts or circumstances. When more than one complainant or more than one respondent is involved, references below to a party, complainant, or respondent include plural, as applicable.

### **Complaints Concerning District Policy or Practice**

Not all complaints of sex discrimination involve active participation by complainants and respondents, including those alleging that the District's own policies and procedures discriminate based on sex. When a sex discrimination complaint alleges that the District's own policies or practices discriminate on the basis of sex, the District is not considered a

"respondent" for procedural purposes. However, the District shall fully implement and follow those parts of the grievance procedures that apply to such complaints and complainants, including when respondents allege that the District's policy or practice discriminates on the basis of sex.

For a complaint alleging that an individual engaged in sex discrimination based on actions the individual took in accordance with the District's policies or practices, the District shall treat the individual as a respondent and comply with the requirements in these grievance procedures that apply to respondents.

### **Upon Complaint Receipt**

When notified of conduct that reasonably may constitute sex discrimination under Title IX or its regulations, the Title IX Coordinator will:

1. Treat the complainant and respondent equally;
2. Offer and coordinate supportive measures as appropriate for the complainant. In addition, if the District has initiated grievance procedures or offered an informal resolution process to the respondent, the Title IX Coordinator will offer and coordinate supportive measures as appropriate for the respondent;
3. Notify the complainant - or if the complainant is unknown, the individual who reported the conduct - of the grievance procedures and the informal resolution process, if available and appropriate;
4. If a complaint is made, notify the respondent of the grievance and the informal resolution process, if available and appropriate;
5. In response to a complaint, initiate the grievance procedures or the informal resolution process;
6. Regardless of whether a complaint is initiated, take other appropriate, prompt, and effective steps, in addition to steps necessary to effectuate the remedies provided to an individual complainant, if any, to ensure that sex discrimination does not continue or recur within the District's education program or activity;
7. The Title IX Coordinator is not required to comply with 1-7 of this section upon being notified of conduct that may constitute sex discrimination if the Title IX Coordinator reasonably believes that the conduct as alleged could not constitute sex discrimination under Title IX or this part.

Upon initiation of the District's Title IX Grievance Procedures, the District will further notify parties of the following:

1. Sufficient information available at the time to allow the parties to respond to the allegations, including the identities of the parties involved in the incident(s), the conduct alleged to constitute sex discrimination, and the date(s) and location(s) of the alleged incident(s);

2. Retaliation is strictly prohibited; and
3. The parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence or an accurate description of this evidence. If the District provides a description of the evidence, the parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence upon the request of any party.

If, in the course of an investigation, the District decides to investigate additional allegations of sex discrimination by the respondent toward the complainant that are not included in the notice provided or that are included in a complaint that is consolidated, the District will notify the parties of the additional allegations.

### **Dismissal of a Complaint**

The Title IX Coordinator may dismiss a complaint of sex discrimination if:

1. The District is unable to identify the respondent after taking reasonable steps to do so;
2. The respondent is not participating in the District's education program or activity and is not employed by the District;
3. The complainant voluntarily withdraws any or all of the allegations in the complaint, the Title IX Coordinator declines to initiate a complaint, and the District determines that, without the complainant's withdrawn allegations, the conduct that remains alleged in the complaint, if any, would not constitute sex discrimination under Title IX even if proven, or
4. The District determines the conduct alleged in the complaint, even if proven, would not constitute sex discrimination under Title IX.

Before dismissing the complaint, the District will make reasonable efforts to clarify the allegations with the complainant. Upon dismissal, the District will promptly notify the complainant of the basis for the dismissal. If the dismissal occurs after the respondent has been notified of the allegations, then the District will also notify the respondent of the complainant, or simultaneously if notification is in writing.

When a complaint is dismissed, the District will, at a minimum:

1. Offer supportive measures to the complainant as appropriate;
2. If the respondent has been notified of the allegations, offer supportive measures to the respondent as appropriate; and
3. Take other prompt and effective steps, as appropriate, through the Title IX Coordinator to ensure that sex discrimination does not continue to recur within the District's education program or activity.

Dismissal on these grounds does not prevent the application of any other District policy that applies to the alleged conduct or referral of the alleged conduct to appropriate administrators.

### **Appeal of Dismissal of Complaint**

The District will notify the complainant that a dismissal may be appealed and will provide the complainant with an opportunity to appeal the dismissal of a complaint. If the dismissal occurs after the respondent has been notified of the allegations, then the District will also notify the respondent that the dismissal may be appealed. Dismissals may be appealed on the following basis:

1. Procedural irregularity that would change the outcome;
2. New evidence that would change the outcome and that was not reasonably available when the dismissal was made; and
3. The Title IX Coordinator (or the assigned investigator or decision-maker) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that would change the outcome.

If the dismissal is appealed, the District will:

1. Notify the parties of any appeal, including notice of the allegations, if notice was not previously provided to the respondent;
2. Implement appeal procedures equally for the parties;
3. Ensure that the decision-maker for the appeal did not take part in an investigation of the allegations or dismissal of the complaint;
4. Ensure that the decision-maker for the appeal has been trained consistent with the Title IX regulations;
5. Provide the parties a reasonable and equal opportunity to make a statement in support of, or challenging, the outcome; and
6. Notify the parties of the result of the appeal and the rationale for the result.

### **Investigation of the Complaint by the District**

The District will provide for adequate, reliable, and impartial investigation of complaints. The burden is on the District-not on the parties-to conduct an investigation that gathers sufficient evidence to determine whether sex discrimination occurred. Any employee or any other person authorized by the District to provide aid, benefit, or service under the District's education program or activity must, upon request by the Title IX Coordinator (or an assigned investigator or a decision-maker), participate as a witness in, or otherwise assist with, an investigation or proceeding under this policy, including these grievance procedures.

1. The District presumes that the respondent is not responsible for the alleged sex discrimination until a determination is made at the conclusion of its grievance procedures;
2. The District will objectively evaluate all evidence that is relevant and not otherwise impermissible, including both inculpatory and exculpatory evidence;

3. Credibility determinations will not be based on a person's status as a complainant, respondent, or witness;
4. The District will provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence that are relevant and not otherwise impermissible;
5. The District will review all evidence gathered through the investigation and determine what evidence is relevant and what evidence is impermissible regardless of relevance;
6. The District will provide each party with an equal opportunity to access the evidence that is relevant to the allegations of sex discrimination and not otherwise impermissible in the following manner:
  - a. The District will provide an equal opportunity to access either the relevant and not otherwise impermissible evidence or an accurate description of this evidence. If the District provides a description of the evidence, the District will provide the parties with an equal opportunity to access the relevant and not otherwise impermissible evidence upon the request of any party;
  - b. The District will provide a reasonable opportunity to respond to the evidence or the description of the evidence; and
  - c. The District will take reasonable steps to prevent and address the parties' unauthorized disclosure of information and evidence obtained solely through the grievance procedures. Disclosures of such information and evidence for purposes of administrative proceedings or litigation related to the complaint of sex discrimination are authorized.

**Evidentiary Exclusions:**

The following types of evidence, and questions seeking that evidence, are impermissible (i.e., will not be accessed or considered, except by the District to determine whether one of the exceptions listed below applies; will not be disclosed; and will not otherwise be used), regardless of whether they are relevant:

1. Evidence that is protected under a privilege recognized by Federal or State law, unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality;
2. A party's or witnesses' records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment to the party or witness unless the District obtains that party's or witness' voluntary, written consent for use in its grievance procedures; and
3. Evidence that relates to the complainant's sexual interests or prior sexual conduct, unless evidence about the complainant's prior sexual conduct is offered to prove that someone other than the respondent committed the alleged conduct or is evidence about specific incidents of the complainant's prior sexual conduct with the respondent that is offered to prove consent to the alleged sex-based harassment. The fact of prior consensual sexual conduct between the complainant and respondent does not by itself demonstrate or imply the complainant's

consent to the alleged sex-based harassment or preclude a determination that sex-based harassment occurred.

### **Questioning the Parties and Witnesses:**

The grievance decision-maker (or the Title IX Coordinator if applying the "single-investigator model) will question parties and witnesses to adequately assess a party's or witnesses' credibility to the extent credibility is both in dispute and relevant to evaluating one or more allegations of sex discrimination. Where the investigator (or the Title IX Coordinator) has interviewed a party or witness, and the investigator is also serving as the grievance decision-maker, credibility evaluation is inherent in the process of conducting the interview. In situations where credibility determinations are required from a grievance decision-maker who did not interview a party or witness, the Title IX Coordinator will facilitate an opportunity for the decision-maker's process of engaging with the evidence resulting from the investigation.

### **Determining Whether Sex Discrimination Occurred:**

Following an investigation and evaluation of all relevant and not otherwise impermissible evidence, the grievance decision-maker (or Title IX Coordinator) will:

1. Use the "preponderance of evidence" standard of proof to determine whether sex discrimination occurred.
  - a. The standard of proof requires the decision-maker (or Title IX Coordinator) to evaluate relevant and not otherwise impermissible evidence for its persuasiveness.
  - b. If the decision-maker (or Title IX Coordinator) is not persuaded by the evidence that sex discrimination occurred, whatever the quantity of the evidence is, the decision-maker (or Title IX Coordinator) will not determine that sex discrimination occurred.
2. Notify the parties in writing of the determination whether sex discrimination occurred under Title IX, including the rationale for such determination and the procedures and permissible bases for the complainant and respondent to appeal.
3. Identify recommended discipline for the respondent for sex discrimination prohibited by Title IX under the District's Code of Conduct.
4. Promptly transmit the grievance record and the determination to the Title IX Coordinator if the Title IX Coordinator did not serve as the decision-maker.

### **Disciplinary Sanctions for Sex-Based Harassment**

Notice is hereby given that following a determination that sex-based harassment occurred, the District may impose disciplinary sanctions, which may include consequences imposed on a respondent following a determination under Title IX that the respondent violated the District's prohibition on sex discrimination. For employees, prohibitions and consequences are stated in policies, labor contracts, and statutes.

The Title IX Coordinator shall provide the appropriate administrator with the findings and determinations arising from the grievance procedures to implement disciplinary sanctions against a respondent for violating the prohibition on sex discrimination.

### **Remedies**

Notice is hereby given that the District may provide remedies, which may include measures provided, as appropriate, to a complainant or any other person the District identifies as having had equal access to the District's education program or activity limited or denied by sex discrimination. These measures are provided to restore or preserve that person's access to the District's education program or activity after the District determines that sex discrimination occurred. A wide variety of remedies affecting personal circumstances may be appropriate depending on the circumstance. Remedies may cause additional burdens upon respondents who have violated the prohibition on sex discrimination. Remedies may include recommended adjustments in District Policies and Practices.

### **District Determination that Sex Discrimination Occurred**

When the respondent is found to have violated the prohibition on sex discrimination under this policy, the Title IX Coordinator will, as appropriate:

1. Coordinate the provision and implementation of remedies to a complainant and other people the District identifies as having had equal access to the District's education program or activity limited or denied by sex discrimination;
2. Coordinate the imposition of any disciplinary sanctions on a respondent, including notification to the complainant of any such disciplinary sanctions; and
3. Take other appropriate prompt and effective steps to ensure that sex discrimination does not continue to recur within the District's education program or activity; and
4. Comply with the grievance procedures before the imposition of any disciplinary sanctions against a respondent; and
5. Refrain from disciplining a party, witness, or others participating in the grievance procedures for making a false statement or for engaging in consensual sexual conduct based solely on the determination of whether sex discrimination occurred.

### **Appeal of the Determination that Sex Discrimination Occurred (Merits Appeals)**

All persons serving as decision-makers in appeals arising from the Title IX grievance process are subject to applicable training requirements. The Title IX Coordinator will continue to manage appropriate supportive measures during all appeals.

For *student respondents*, generally, a determination of whether sex discrimination occurred will be appealable by either the complainant or the respondent, or both. Appropriate supportive measures managed by the Title IX Coordinator will continue during the appeals. If the determination that sex discrimination occurred is affirmed, reversed, or modified on appeal, the grievance returns to the Title IX Coordinator to modify the District's response actions as and if appropriate.

For *employee respondents*, a determination that sex discrimination occurred will be appealable by either the complainant or the respondent, or both. Appropriate supportive measures managed by the Title IX Coordinator will continue during the appeals. If the determination that sex discrimination occurred is affirmed, reversed, or modified on appeal, the grievance returns to the Title IX Coordinator to modify the District's response actions as and if appropriate. However, when a final determination is made that an employee violated the prohibition on sex discrimination under Title IX, the concluded grievance record and determination will be sent to the Superintendent or a designee for purposes of determining disciplinary action specifically directed at that employee.

### **Timeframe**

The District has established the following timeframes for the major stages of the grievance procedure below. Timelines are not jurisdictional but merely establish expectations for being "prompt" in resolving Title IX matters in most cases. As used in this procedure, a "day" is a day the office of the Title IX Coordinator is open for business.

1. Evaluation of the complaint (i.e., decision whether to dismiss or investigate a complaint): *Not to exceed five full school days upon receipt of a complaint*
2. Notices and Investigation: *Not to exceed 24 hours after proceeding with an investigation*
3. Evidence organization, summarization by the Title IX Coordinator or a chosen Investigator: *Not to exceed five school days upon proceeding with an investigation*
4. Evidence review and response by parties: *Not to exceed 48-hours upon receipt of such materials*
5. Title IX Coordinator or a chosen Decision-maker evidence evaluation determination: *Not to exceed 48-hours upon receiving such evidence*
6. Appeal of determination: Completion of appeal process, including determination - *Five school days*

The District allows for reasonable extension of timeframes on a case-by-case basis for good cause with notice to the parties that includes the reason for the delay. The Title IX Coordinator may grant these extensions on the Title IX Coordinator's own initiative or upon a qualifying request or need presented by a party, investigator, decision-maker, district administration, DCF, juvenile officer or agency, or law enforcement agency. The circumstances warranting a qualifying extension will be noted in the District's Title IX records of the complainant's case.

### **Overlapping Discrimination Claims and This Procedure**

To the extent that the underlying facts and legal questions in a complaint handled under the Title IX grievance process overlap with and pertain to the District's compliance with another law or regulation concerning discrimination, the evidence and findings of the Title IX grievance process may be used for both purposes, in the discretion of the Title IX Coordinator.



### **Maintenance of Records**

The District is required to maintain for seven (7) years each notification received by the Title IX Coordinator of conduct that reasonably may constitute sex discrimination under Title IX or the regulations, documentations of the actions the District took to meet its obligations to respond promptly and effectively to complaints. Such records will be securely maintained in a locked file cabinet located in a secured office accessible to the Title IX Coordinator.

### **Regulation approved:**

## Students

### 5145.12 - Search and Seizure

Students have the right to be free of unreasonable searches and seizures under the Fourth Amendment of the Constitution of the United States. Balanced against this right is a school official's responsibility to create and maintain an environment consistent with the school's educational mission. School officials have a duty to protect the health, safety, and welfare of all students under their authority.

School administrators or their designee are authorized to search school lockers as well as other school property and to search students and their personal property (including student automobiles located on school property) with reasonable care for the Fourth Amendment rights of such students. Any such searches are subject to the following requirements:

1. *Reasonably justified from inception.* There must be reasonable grounds for suspecting that the search will turn up evidence that the student has violated or is violating either the law or the rules of the school.
2. *Reasonable Suspicion.* School officials must have individualized, reasonable suspicion to believe there is evidence of a violation of law, Board policy, or school rule. Reasonable suspicion includes when school officials have reasonable information that an emergency or dangerous circumstances exist.
3. *Reasonable in Scope.* The actual search must be reasonably related to the objectives of the search and not excessively intrusive in light of the age, sex, maturity of the student and nature of the alleged infraction.

Teachers and other personnel are directed to promptly notify school administration when a situation arises that in their opinion requires the search of student, his/her belongings, school locker/desk or other property. Teachers are not authorized to conduct a search themselves unless explicitly requested to do so by an administrator. Searches shall be conducted in the presence of another adult witness whenever feasible under the circumstances.

#### I. Student Searches

Students or their property, including personal automobiles parked on school property, may be searched according to the three requirements described above. Whenever possible, school officials will obtain consent from students prior to conducting any searches. It is the Board's policy to prohibit student strip searches by school officials. The parents/guardian of any student who is subjected to a student search shall be notified as soon as feasible. Any search conducted by a school administrator or his/her designee shall be carried out in the presence of another adult witness unless an emergency exists.

An administrator may search a student's cell phone or other electronic communication device if

the administrator has reasonable suspicion that a search will reveal that a law, Board policy, or school rule has been violated, and the search must be reasonable in scope. A student's cell phone or other electronic communication device shall not be searched if the student's conduct consisted solely of having such device out and/or using such device at an inappropriate time in violation of Board policy or school rules. If an administrator has reasonable suspicion that the search will turn up evidence of sexting (i.e., nude and/or sexually explicit pictures of children), the administrator should contact police officials and not conduct a search. This does not prohibit administrators from questioning students about their suspicions that sexting has occurred.

School administrators and/or teacher may seize any item which is evidence of a violation of the law, Board policy, or school rule.

If a search produces evidence of criminal wrongdoing, a school administrator or his/her designee shall notify the police. If police officials are notified, a school administrator or his/her designee shall advise the student's parents of this fact as soon as possible. Administrators shall document all searches including an inventory of items seized. It is recommended that photographs be taken of the seized items.

## II. Search of School Property (Lockers, desks, and other school property)

Lockers, other storage spaces, desks, school owned/leased technology (i.e., Chromebook and laptops), and similar school property are provided to students for their convenience. These items remain the property of the Windsor Locks Public Schools despite being provided to students for their use.

The right to inspect desks and lockers and other school property assigned to students may be exercised by school officials to safeguard students, their property and school property with reasonable care for the Fourth Amendment rights of students.

The exercise of the right to inspect also requires protection of each student's personal privacy and protection from coercion. An authorized school administrator may search a student's locker or desk under three (3) conditions:

1. There is reason to believe the student's desk or locker contains the probable presence of contraband materials.
2. The probable presence of contraband material poses a serious threat to the maintenance of discipline, order, safety and health in the school.
3. The student(s) has been informed in advance that Board policy allows desks and lockers to be inspected if the administration has reason to believe materials injurious to the best interests of students and the schools are contained therein.

Additionally, the periodic routine inspection of school lockers is permissible to ensure that school property is being used appropriately in a manner consistent with the health and safety of students. Notice shall be provided that routine inspection may occur.

In accordance with the board's acceptable use policy, Students shall have no expectation of privacy in school issued technology.

### III. Drug sniffing dogs

Use of drug-detection dogs may be used only on the express authorization of the Superintendent. The use of drug-detection dogs shall be conducted according to established guidelines and applicable law. To support an effort to eliminate the possession and use of illegal substances, the Board permits the Superintendent to invite law enforcement or individuals from other qualified agencies to use trained dogs on school property to sniff for the presence of substances prohibited by law or school policies such as those prohibiting use/sale/possession of drugs or alcohol. Safety precautions will be taken to ensure student safety while dogs sniff or searches are occurring.

### ~~IV. Use of Metal Detectors~~

~~Use of metal detectors, or similar detective devices may be used only on the express authorization of the Superintendent and in accordance with guidelines established for such use.~~

IV. Use of metal detectors, similar detective devices; and/or breathalyzers and other passive alcohol screening devices may be used only on the express authorization of the Superintendent, in accordance with such procedures as the Superintendent may devise.

### V. Seizure of Contraband

VI. District officials may seize any item which is evidence of a violation of the law, Board policy, or school rule. Law Enforcement Personnel

Searches of school property or students may be conducted by law enforcement personnel only with prior approval of, or at the request of, the school administration. Noted exceptions to this policy are when a police officer witnesses a crime on school property, suspects a student is armed, or a student is attempting to destroy evidence of the commission of a crime. If a Memorandum of Understanding (MOU) exists between the Windsor Locks Public Schools and the local police in place protocols contained in the MOU shall be followed.

### VII. Notification

Parents and students shall be notified of this search and seizure policy through its inclusion in District student handbooks, and/or placement on individual school and/or District websites. Students may be further notified of individual school practices related to random routine locker inspections, the use of drug sniffing dogs and/or use of metal detectors on school grounds through onsite postings, letters sent home or notices provided to students concurrent with locker assignment.

### Legal References:

Connecticut General Statutes:

10-221 Boards of education to prescribe rules  
54-33n Search of school lockers and property

Case Law

*New Jersey v. T.L.O.*, 469 U.S. 325; 105 S.Ct. 733

*Safford Unified District #1 v. Redding*, 129 S.Ct. 2633  
*Burbank v. Canton Board of Education*, 2009 WL 3366272, \*8 (Conn. Super. Ct. Sept. 14, 2009)

Policy Adopted: March 28, 2013  
Policy Revised: December 8, 2022

## **R5145.12**

### **Students**

#### **R5145.12 - Search and Seizure**

##### **Justification for Student Searches**

Students have the right to be free of unreasonable searches and seizures under the Fourth Amendment of the Constitution of the United States. Balanced against this right is the school officials' responsibility to create and maintain an environment consistent with schools educational mission. School officials have a duty to protect the health, safety, and welfare of all students under their authority.

##### **Prohibited Items**

Students are prohibited from bringing to school items or substances which would disrupt the education function of the school or which are prohibited by school Board policy or administrative regulations or by law. Examples of items or substances in this category are weapons, clubs, explosives, firecrackers, alcoholic beverages, and drugs or drug paraphernalia, vapes or other nicotine or marijuana delivery systems.

##### **Lockers and Other Property**

Lockers and other storage spaces are provided to students for their convenience. These storage areas remain school property, and as such, are subject to routine periodic inspections by school authorities as well as searches. Such inspections allow responsible school authorities to confirm lockers are being used appropriately in a manner consistent with the health and safety of all students. Students should not store items which violate school Board policy, administrative regulations, or law in school lockers.

##### **Emergencies**

Circumstances which could put the safety of students or school staff at risk or could result in substantial property damage also constitute sufficient reasons for school or police officials to conduct a thorough search of all school property. A bomb scare is an example of such an emergency.

Principals, or designees, may also conduct searches of student lockers, or property of students themselves, when there are reasonable grounds to suspect a particular student is in possession of an item or a substance that represents a material threat to school routine or is prohibited by school Board policy, administrative regulations, or law.

Student property shall include, but not be limited to, purses, knapsacks, book bags, and the like; outer coats and jackets; footwear; belts; pockets; hair; hats; and automobiles. If students do not have access to their cars during school hours, searching student automobiles should not be done.

School authorities in cooperation with police may use dogs to conduct searches of school property and student-driven automobiles.

School authorities shall cooperate with appropriate law enforcement agencies in investigations of incidents on school property and in other investigations as outlined in Board of Education policy.

### **Lockers and Other School Property (Desks)**

1. The school Principal or designee shall maintain an accurate list of all locker assignments and either a master key or combinations to all lockers.
2. At the time a student is assigned a locker or other storage space, he or she shall be informed that school authorities are empowered to conduct random periodical inspections of school lockers as well as searches based on reasonable suspicion of a student's having illegal items or items violative of Board policy or administrative regulation. Inspection policy also shall be posted in appropriate locations throughout the school.
3. Students will also be informed of the following locker regulation:
  - a. Students are responsible for the contents of the locker assigned to them.
  - b. Students are to keep their lockers locked.
  - c. Students are not to give other students access to their locker.
4. The exercise of that right to inspect also requires protection of each student's personal privacy and protection from coercion. An authorized school administrator may search a student's desk or locker under the following conditions:
  - a. When the administrator believes the search is justified at its inception and is reasonably related in scope to the circumstances justifying it;
  - b. There are reasonable grounds to believe the search will reveal evidence that a student has violated or is violating either school rules or laws.

The search of a group of students' desks or a group of students' lockers, where no particular student within the group is suspected, may be conducted only if there is a reasonable suspicion of conduct immediately harmful to students, staff, or school property.

### **Prescription/Nonprescription Drugs**

Students who have a legitimate need to bring prescription and nonprescription drugs to school should register this information in the nurse's office. No student shall possess, use, or sell/distribute drugs of any kind, inclusive of controlled substances, nonprescription and prescription drugs and medical marijuana, in a manner that violates state law or board policy. Students remain subject to possible search and seizure for the possession, use, sale or distribution of drugs where reasonable suspicion exists to believe a school rule, board policy or law has been violated.

## **Lost and Abandoned Items**

### **Lost or abandoned items will be inspected by school authorities**

1. All searches of students shall be conducted or authorized by the Principal or designee, in the presence of a witness unless an emergency situation exists.
2. Students may be asked to consent to searches, but in no event shall the student be threatened with harsher punishment or treatment for refusing to consent, nor shall he or she be coerced or induced to give consent in any other manner. Consent, if given, shall be in writing. If the student is unwilling to give free and voluntary consent, the school administrator may order the student to submit to a search. No student shall forcibly be searched. Students who refuse to consent may be subject to school disciplinary action for insubordination or another appropriate offense.
3. Searches should be no more intrusive than necessary to discover that for which the search was instigated.
4. A search of a student's handbag, gym bag or similar personal property carried by a student may be conducted if there are "reasonable grounds" for suspecting the search will turn up evidence the student has violated, or is in violation, of the law or the rules of the school.
5. A locker search shall be conducted in the presence of another staff member and in the presence of the student responsible for the contents of the locker, if possible.
6. Searches may include, if school authorities think necessary, a frisk or pat down of student's clothing. Frisks, or pat down searches, shall be conducted by a member of the same sex as the student and in the presence of another staff member.
7. At no time should school officials conduct a search which requires a student to remove more clothing than shoes, hat, or jacket. If school authorities are convinced a more intrusive search is required, they should advise the proper law enforcement agency.
8. "Strip searches" of students are prohibited by employees of the Windsor Locks Public Schools.
9. Student searches, which disclose evidence of school misconduct, but not criminal misconduct, should be treated according to applicable policies and/or regulations.

In the event a student search discloses evidence of criminal wrongdoing, the school Principal or designee shall notify police officials of the fruits of the search. If police officials are notified, the student's parent/guardian should be advised of this fact as soon as possible.



## **Cooperation with Police and Other Authorities**

The Police Department and the school system work closely to protect the health and welfare of all students, and all school personnel shall cooperate fully with the police department. On occasion, it may be necessary for the police to interview a student in school or arrest a student during school hours. The following procedures shall guide the administration in such occurrences. If the District has entered a Memorandum of Understanding (MOU) with the police, applicable protocols set forth in the MOU shall be followed.

### **Questioning of a Student**

1. If the police wish to question a student regarding an incident that did not occur on school property during the school day, the administrator shall request of the police that the interviewing of the student take place, if possible, at the Police Department or at the home of the student rather than on school premises. Any administrator receiving such a request from the police, shall notify the Superintendent of Schools as soon as possible.
2. When it is necessary to interview a student on school grounds, the Principal shall ask the police officer for an explanation of the purpose of the interview and attempt to notify the parent/guardian of the student in order to have them present during the interview. The administrator shall request of the police that an interview not take place until the parent/guardian has been notified.
3. In cases where the parent/guardian is not present during an interview, the Principal (or his/her designee) must be present and must advise the student that participation in the interview is voluntary. As soon as possible, the Principal shall notify the parent/guardian that the interview took place.
4. The administrator present during the interview shall keep notes and retain such notes in his/her file pending resolution of the incident being investigated.

### **Arrest of a Student**

1. The Principal may request of the police that they not arrest a student in school for a non-school related offense.
2. If the police must arrest a student in school, the Principal shall ask to see the arrest warrant and attempt to have the arrest take place in as private a location as possible and as discreetly as possible.
3. The Principal shall notify the parent/guardian of a student who is arrested on school property during the school day as soon as possible.
4. The Principal shall also notify the Superintendent of Schools of the arrest as soon as possible.

## **Request for Information from the Police**

If the police request information from school personnel to assist them in their investigation of a complaint, personnel must be guided by the following:

1. Provide official student records only with parent/guardian consent or if a subpoena or court order to provide the records is presented. Note: if a subpoena or court order to provide student records is presented, notify the parent/guardian of the student that records have been released to the police. Consultation with the District's legal counsel is recommended before providing the requested records.
2. If the police request the names of students and/or staff that were interviewed in the school investigation of a situation in the school, the names of those who might be able to provide relevant information should be provided.
3. If the police request notes from the school investigation, the notes do not need to be provided unless ordered by subpoena or court order. Indicate to the police that notes are not official and that because they were taken in response to a school complaint rather than a police complaint, they would not be appropriate for police use.

## **Notification of Search and Seizure Policy and Practices**

Students shall be informed annually that Board policy allows for the legal search of students, their personal property including personal technology such as cellphones and student vehicles parked on school grounds, school property such as school desks/lockers and as well as the possible use of dog sniffing canine and metal detectors, if deemed appropriate and necessary by the Superintendent of Schools. Searches shall be in accordance with state and federal law and Board policy and regulations.

Parents and students shall be annually notified through one or more of the following methods:

1. Placement of Board Policy in Student/Parent handbooks;
2. Placement of Board Policy on individual school and/or District websites;
3. Postings at schools regarding locker/desk searches including random routine locker inspections, and/or the use of drug sniffing dogs and/or use of metal detectors;
4. Letters sent home to parents/guardians;
5. Written notification of Board policy/practice provided concurrent with the assignment of student lockers or student parking permits/spaces.

(cf. 5141.21 Administering Medications)

### **Legal References:**

Connecticut General Statutes  
10-221 Board of Education to prescribe rules.  
54-33n Search of school lockers and property  
*New Jersey v T.L.O.*, 53 U.S.L.W. 4083 (1985)  
*Safford Unified School District #1 v. Redding* (U.S. Sup. CT 08-479)

Regulation Approved: March 28, 2013  
Regulation Revised: December 8, 2022

**ADMINISTRATIVE REGULATION REGARDING SEARCH AND SEIZURE (OPTIONAL ADDENDUM  
REGARDING USE OF DOGS ON SCHOOL PROPERTY)**

The Board of Education (the “Board”) shall permit the administration to invite law enforcement agencies or other qualified agencies or individuals to search school property with dogs specially trained when necessary to protect the health and safety of students, employees or property of Windsor Locks Public Schools (the “District”), and for the purpose of detecting the presence of illegal substances or contraband, including alcohol and/or drugs.

The use of trained detection dogs is subject to the following:

1. The administration shall authorize the search and the principal or his/her designee shall be present while the search is taking place.
2. All school property such as lockers, classrooms, parking areas and storage areas may be searched.
3. Dogs shall not be used in rooms occupied by persons except as part of a program designed to inform students/parents of the capabilities of the dogs. Individual(s) shall not be subjected to a search by dogs.
4. Parents and students shall be notified of the Board’s policy concerning search and seizure and this regulation, which shall be publicized to students. Specific dates of planned searches need not be released
5. When conducting a search of an individual or his/her effects based upon a dog’s signal, the principal or his/her designee shall conform to the requirements of the Board’s policy and regulation pertaining to searches of a student, his/her effects and/or locker searches.
6. The administration of the District shall have sole authority for determining internal disciplinary action in regard to illegal substances or contraband on school property.
7. Although detection dogs may be under the control of law enforcement agencies, the administration of the District shall have sole determination as to when a sweep of school property will be conducted.
8. When detection dogs are employed, the school should follow standard protocol for a lockdown procedure prior to the dogs and their handlers entering the building.

7/11/16

Technical Rev. 9/21/2020

**ADMINISTRATIVE REGULATION REGARDING SEARCH AND SEIZURE (OPTIONAL ADDENDUM  
REGARDING USE OF BREATHALYZERS ON SCHOOL PROPERTY)**

The Board of Education (the “Board”) supports the use of both passive alcohol screening (“PAS”) devices and breathalyzers during the school day or at school-sponsored events, on or off campus, to deter the use of alcohol by students in the Windsor Locks Public Schools (the “District”) and to promote the health and safety of all students.

This regulation provides the basic structure for the use of passive alcohol sensors and breathalyzers in this District to detect/confirm alcohol consumption by students. Such instruments shall be used by the District to 1) to confirm a reasonable suspicion that a particular student has used or is under the influence of alcohol at school during the school day, or at a voluntary, extracurricular school-sponsored event; and/or 2) systematically screen students attending extracurricular/voluntary school-sponsored events for possible alcohol use.

The passive alcohol sensor (“PAS”) device is a non-invasive high-speed breath alcohol-screening instrument which can be used as a “sniffer” for overt or covert alcohol detection. This device may be used to sample a student’s breath in order to detect alcohol use, with results reported as either “positive” or “negative.” A breathalyzer is a device that detects and measures alcohol in expired air so as to determine the concentration of alcohol in a person's blood.

Only designated school personnel will be trained in the use of the PAS device and/or breathalyzer test. All testing instruments shall be properly calibrated and will be checked for accuracy and for full calibration in accordance with the manufacturer’s standards. Testing of students using these devices will be conducted in a separate area, to the extent practicable, to maintain student privacy.

Results from a PAS device or breathalyzer will be maintained in a confidential manner, and released in accordance with District policy and state and federal law.

**A. Testing to Confirm Reasonable Suspicion of Alcohol Use**

If there is reasonable suspicion that a student is under the influence of alcohol at school or at a school-sponsored event, the student shall be removed to a separate area for observation and questioning concerning alcohol consumption. The student will be informed as to how the PAS device operates and will be asked to breathe across the intake part of the device. Testing will be conducted by trained personnel, in a separate area whenever possible, to maintain student privacy. Any student who tests positive will be asked to submit to a second test using a breathalyzer. If the student tests positive for a second time, the school will contact the student’s parents. If necessary, the student will be brought to the school nurse for medical treatment and emergency medical protocols shall be followed.

If the student tests positive on either test, or if the student refuses to take the test when there is reasonable suspicion of alcohol use, the student may be subject to appropriate disciplinary action consistent with District policies and procedures.

**Reasonable suspicion shall include**, but not be limited to, any of the following:

1. Observed use or possession of alcohol;
2. Alcohol odor or the presence of an alcohol container;
3. Slurred speech, unsteady gait, lack of coordination, bloodshot or glazed eyes;  
or
4. Marked changes in personal behavior not attributable to other factors.

**B. Extracurricular/Voluntary School-Sponsored Events**

The Board also allows for the use of PAS devices and breathalyzers in connection with students’ participation in extracurricular/voluntary school-sponsored events and activities without the need for school personnel to first have reasonable suspicion of alcohol use. Such suspicionless testing will occur only if students are notified prior to the event or school-sponsored activity that a PAS or breathalyzer may be used, and that they may be denied entry and/or removed from the event or activity for either refusing to submit to such testing or for testing positive for alcohol use. Students will be notified through a variety of means, including orientation programs, student handbooks and/or electronic publications.

When PAS devices and/or a breathalyzer will be used at a voluntary school-sponsored event (i.e. school dances, proms, etc.), such devices shall be administered as follows:

1. All students participating in the activity or school-sponsored event will be asked to submit to a PAS screening. Students will be asked to breathe across the intake part of the device.
2. If the PAS device detects alcohol, the student shall be removed to a separate area for observation and questioning concerning alcohol consumption. After fifteen (15) minutes, the student will be asked to submit to a breathalyzer test to confirm the presence of alcohol.
3. Should the student test positive after the second test, school personnel will contact the student's parents and the student shall be removed/denied entry to the activity or school-sponsored event.
4. Any student who refuses to breathe into the PAS device, or who refuses to submit to the breathalyzer test, may be excluded or removed from the activity or school-sponsored event and may face additional disciplinary actions.
5. The District retains the right to contact local law enforcement officials at any time, as deemed appropriate, consistent with District practice and policy.

7/11/16

Technical Rev. 9/21/2020

## **Instruction**

### **Internet Acceptable Use: Filtering**

The Windsor Locks Public Schools is fortunate to have access to the Internet at all schools. This access provides increased opportunities for students and staff to conduct research and to communicate locally, nationally, and internationally.

This wonderful resource also provides access to material unsuitable for students and which has no educational value. It is the responsibility of all District staff to ensure that the Internet, as used in District Schools, is appropriately guided and monitored. Moreover, staff also has the responsibility to conduct themselves in an appropriate private manner when using the Internet.

The Board of Education provides computers, computer systems, software, electronic access privileges, and networks for students and staff to carry out the mission of the Board in an environment which ensures access to up-to-date information, management, and communication services. Responsible use of these systems and networks is expected of all students and staff.

The computers, computer systems, software, electronic access privileges, and networks are the property of the Board of Education and are to be used only for those activities directly related to teaching, learning, and/or management by students and staff. The equipment, infrastructure, and software are not to be used for personal gain by any student or staff member.

In order to ensure that the District's Internet connection is used in the appropriate manner and that all users are protected from any inappropriate information published on the Internet, the District has and is continuing to implement the following:

1. Professional development opportunities to help teachers integrate the use of the Internet into classroom teaching.
2. Use of the computers, computer systems, software electronic access privileges and networks shall be restricted to those users who have signed the District's "Acceptable Use Policy." In the case of minors, the "Acceptable Use Policy" must also be signed by the student's parent or guardian.
3. Implementation of a system developed to filter out Internet sites with content considered unacceptable for student viewing. A committee of teachers, parents, and administrators shall be used to receive appeals from users who have a specific use in mind for a filtered site.

The Internet changes rapidly making it impossible to filter all objectionable sites. Therefore, the staff role in supervising and monitoring student access to the Internet is critical. In addition, each individual has the responsibility to monitor their own navigation on the Internet to avoid undesirable sites.

The District recognizes its responsibility to educate students regarding appropriate behavior on social networking and chat room sites about cyberbullying. Therefore, students shall be provided instruction about appropriate online behavior, including interacting with other individuals on social networking sites and in chat rooms and cyberbullying awareness and response.

(cf. [6141.321](#) - Acceptable Use of the Internet)

(cf. [6141.322](#) - Web Sites/Pages)

Legal Reference: Connecticut General Statutes

[1-213](#) Access to public records. Exempt records.

[10-15b](#) Access of parent or guardians to student's records.

[10-209](#) Records not to be public.

[11-8a](#) Retention, destruction and transfer of documents

[11-8b](#) Transfer or disposal of public records. State Library Board to adopt regulations.

[46b-56](#) (e) Access to Records of Minors.

Connecticut Public Records Administration Schedule V - Disposition of Education Records (Revised 1983).

Federal Family Educational Rights and Privacy Act of 1974 (section 438 of the General Education Provisions Act, as amended, added by section 513 of PL 93-568, codified at 20 U.S.C. 1232g.).

Dept. of Education. 34 CFR. Part 99 (May 9, 1980 45 FR 30802) regs. implementing FERPA enacted as part of 438 of General Education Provisions Act (20 U.S.C. 1232g)-parent and student privacy and other rights with respect to educational records, as amended 11/21/96.

HR 4577, Fiscal 2001 Appropriations Law ( contains Children's Internet Protection Act)

Public Law 94-553, The Copyright Act of 1976, 17 U.S.C. 101 et. seq.

Public Law 110-385 Broadband Data Improvement Act/Protecting Children in the 21<sup>st</sup> Century Act

*Reno v. ACLU*, 521 U.S. 844 (1997)

*Ginsberg v. New York*, 390 U.S. 629, at 642, n.10 (1968)

*Board of Education v. Pico*, 457 U.S. 868 (1988)

*Hazelwood School District v. Kuhlmeier*, 484 U.S. 620, 267 (1988)

Policy adopted:

## Instruction

### Drugs, Tobacco, Alcohol

~~Because~~Since the use of these harmful agents ~~has~~ may have a deleterious effect on the health and welfare of the users, and ~~causes~~ far-reaching detrimental consequences to ~~the~~ users, ~~their~~ families, and society, ~~the Board of Education desires that every~~ efforts shall be made by ~~all~~ staff members to reduce ~~the chances that~~ students ~~will begin or continue~~ use of such harmful drugs, tobacco and alcohol.

The professional staff shall be provided information and skills to acquaint them with problems of drug, tobacco, and alcohol use and in~~become more aware of the problem and become more expert in~~ recognition of the symptoms of such use. At least annually, and as other opportunities arise, teachers in each grade shall emphasize the effect of alcohol, nicotine, tobacco and drugs on health, character, citizenship, and personality development ~~wherever appropriate~~ in ~~the~~ health education programs and other contexts~~which touch on the subject~~.

The Superintendent shall~~It is desired that the administration~~ make use of in-service training sessions for both certified and non-certified staff to achieve the goals of this policy. ~~and that~~ ~~Full~~ cooperation with community agencies shall be given wherever such cooperation is~~can be~~ advantageous to ~~the~~ students.

(cf. [5131.6](#) - Drugs, Tobacco, Alcohol)

Legal Reference: Connecticut General Statutes

[10-16b](#) Prescribed courses of study.

[10-19](#) Effect of alcohol, nicotine or tobacco and drugs to be taught.

[10-19a](#) Superintendent to designate substance abuse prevention team.

[10-19b](#) Advisory councils on drug abuse prevention.

[10-220](#) Duties of boards of education.

[10-221\(d\)](#) Boards of education to prescribe rules.

Policy Adopted: June 7, 2007

Policy Revised:



## Instruction

### **Exemption From Acquired Immune Deficiency Syndrome (AIDS) Instruction**

The Board of Education recognizes that a good health program is basic to the personal, social and emotional well being of our students. ~~The number of cases of Acquired Immune Deficiency Syndrome (AIDS) remains as a tragic reality of society. Therefore, it is important that the schools educate students about AIDS. It is recognized that however difficult it may be to communicate openly and honestly about AIDS and its implications it must be done. AIDS education has become a matter of life and death.~~

~~In accordance with the provisions of Section 10-19(b) of the Connecticut General Statutes, it is the policy of the Board of Education to provide, during the regular school day, planned, ongoing and systematic instruction on Acquired Immune Deficiency Syndrome (AIDS).~~

~~The Superintendent of Schools shall develop procedures concerning the exemption of students from such instruction upon the written request of the student's parent or guardian.~~

~~The study of AIDS is presented to enable students to develop an awareness and understanding of this serious disease. Pursuant to State Department of Education guidelines, instruction in AIDS must be planned, ongoing and systematic, with instruction by legally qualified teachers offered over the course of the following grade sequences: K-2, 3-5, 6-8 and 9-12. As children grow toward adulthood, it is important that they hear the AIDS prevention message frequently and consistently.~~

~~Parents or guardians may exempt their children from those units of classroom instruction dealing with Acquired Immune Deficiency Syndrome (AIDS). Students 18 years of age may exempt themselves from those units of classroom instruction. The request must be made in writing.~~

Legal Reference: Connecticut General Statutes

[10](#) 19(b) AIDS education.

Policy Adopted: May 9, 2007

Revised: September xx, 2024

**Windsor Locks Board of Education  
Manual of Policies, Regulations, and Bylaws**

Section:	<b>INSTRUCTION</b>	Definition:	POLICY
Title:	Homework	Number: <del>6170</del> 6154	
		Page:	1 of 3
Adopted:	September 1985		
Revised:	October 1996, August 2024		

### Philosophy

Learning involves active participation on the part of the learner. Homework is one of the processes by which the student becomes actively engaged in the learning, acquiring knowledge and skills while developing attitudes, values and ideals that make the students responsible and curious learners.

The teaching-learning process should be a shared experience between the teacher, the student and the parent.

Homework is a vital part of the process of learning. Homework should offer the student added opportunity to master course content and to think critically as well as to reinforce habits of reliability, self-discipline, responsibility and independence.

Homework should be relevant and meaningful to the learning experience to enable students to carry their learning into the home and the community. Assignments should be challenging and interesting while keeping in mind individual differences in order that all students feel pride in their accomplishments.

### Goals

The goals of homework assigned to students in the Windsor Locks Public Schools are as follows:

- homework should be an integral part of the total educational experience;
- homework should have a valid instructional purpose and should be an extension of the goals and objectives of the curriculum;
- homework should be designed to prepare students for new learning or to practice what has already been taught in the classroom;
- homework should be designed to develop a sense of responsibility and resourcefulness;
- homework should be designed to stimulate student interest through further exploration of a topic or concept;
- assignments or projects should be completed independently by the student (or a group of students assigned by the teacher) outside of the classroom;
- homework may be a long-range assignment and done over an extended period of time;
- the quality of homework should be held to high standards;
- homework should be structured to integrate and produce original responses or demonstrate transfer from the information to application level; and
- homework should acquaint parents with information about what students are learning and invite their appropriate participation.

# Manual of Policies, Regulations, and Bylaws

## Policy 6170 Homework REGULATION/PROCEDURES/FORMS

Page: 1 of 2

In order for a student to be successful in school, the responsibility must be shared. Students, parents and guardians, and staff must work together to promote and realize educational goals. The responsibility for homework will be shared as follows:

### Responsibilities

#### Student

- completes and submits the assignment on time;
- accepts responsibility for understanding the assignments and gathering the needed materials;
- plans a personal schedule which will allow sufficient time for research and the completion of quality work;
- is cognizant of each teacher's homework policy and is responsive to those expectations;
- takes initiative to obtain make-up work;
- seeks assistance from teachers and/or parents if needed; and
- is aware that homework may extend beyond writing or reading assignments including review and preview of material.

#### Teacher

- assures the students understand the purpose of the assignment;
- clarifies and ascertains students' understanding of the assignment;
- evaluates and gives feedback regarding completed work in a timely manner;
- provides differentiated assignments according to students' individual needs;
- coordinates assignments with other staff and specialists at the elementary and middle school levels;
- refrains from assigning homework as a punitive measure;
- emphasizes quality and encourages revision, if needed;
- teaches study skills needed for successful completion of assignments;
- informs parents and students in writing of homework policy;
- assigns homework which is an outgrowth of/or supportive of class work and curriculum goals;
- informs parents when expectations are not being met;
- varies assignments to accommodate different learning styles, interests and talents; and
- carries out homework policy in a consistent manner.

#### Administration

- supports and monitors the application of the homework policy;
- acts as a liaison for teachers, parents and students regarding homework issues;
- informs students, parents and teachers of the district homework policy; and
- reviews with all constituencies periodically the efficacy of the homework policy.

**Windsor Locks Board of Education  
Manual of Policies, Regulations, and Bylaws**

**Policy 6170  
Homework  
REGULATION/PROCEDURES/FORMS**

Page: 2 of 2

Parent

- reviews with student homework policy and expectations from teacher;
- establishes an appropriate place for student to work;
- assists students in assembling appropriate materials;
- helps student with homework as appropriate;
- assists student in developing a reasonable and appropriate homework schedule;
- displays active interest in the student's work;
- encourages student to take responsibility for own work and to seek out assistance when needed;
- maintains communication with student's teacher; and
- encourages student to read, write and explore areas of interest for pleasure, especially when there is little assigned homework.

Time Guidelines

Grad	Time	Times Per
K	10	2-3
*1	15	3-4
*2	20	4
*3	25	4
*4	30	4
*5	45	4
6	60	4-5
7	20-	4-5
8	30/subject	4-5
9	30-	5
10	30-	5
11	30-	5
12	30-	5

\*From time to time, long-term assignments or exams will be given which will necessitate work on weekends and over vacations.

**EXHIBIT VI**

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION  
FROM: SHAWN L. PARKHURST, SUPERINTENDENT  
DATE: AUGUST 29, 2024  
RE: 2024-2025 CALENDAR

In reviewing the 24-25 calendar with our leadership team, the following recommended changes are presented for your review, discussion and potential approval:

- December 11 & March 19 early dismissal times, due to conferences and PLC's, don't allow for North and WLHS to be dismissed at the same time. The proposal is to utilize the "early dismissal weather related schedule" which is as follows to alleviate the transportation concerns:

2024 - 2025 School Hours	
School	Weather/Emergency and ½ Day Early Dismissal
NSS	8:30 - 11:00
NSS	No pm Pre-K
NSS	8:40 – 1:15
SES	8:10 – 12:45
Middle	7:40 – 12:15
High	7:30 – 12:01
PMA	8:45 – 12:45
RISE	8:00 – 12:01

- Additionally, WLMS and WLHS are requested to switch the evening conference schedule so that WLMS will have evening conferences on October 24, 2024 and WLHS will have evening conferences on October 23, 2024.

**Possible Board Motion:** “**MOVE** that the Board of Education approve the changes to the 24-25 school calendar as presented.”

## EXHIBIT VII

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION

FROM: SHAWN L. PARKHURST, SUPERINTENDENT

DATE: AUGUST 29, 2024

RE: OCTOBER 24, 2024 BOARD OF EDUCATION MEETING

Windsor Locks High School has identified the week of October 21 - 26, 2024 as Homecoming Week. The week is filled with spirit days and a variety of events. While looking ahead, Thursday, October 24, 2024 is the annual Student PowderPuff Game which conflicts with the regularly scheduled Board of Education Meeting.

During October the Board is scheduled to meet on October 10 and 24, 2024. Due to the conflict with the Student PowderPuff Game, a discussion is warranted on how the Board would like to proceed with the October meetings.

### **Possible Board Motion to Follow**

**EXHIBIT VIII**

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION

FROM: SHAWN L. PARKHURST, SUPERINTENDENT

DATE: AUGUST 29, 2024

RE: CAPITAL IMPROVEMENT PROJECT – NORTH STREET  
SCHOOL PARTIAL ROOF REPLACEMENT

A pre-bid walkthrough for the Board of Education and Board of Finance approved FY 2024-2025 Capital Expenditure for a North Street School partial roof replacement took place at the school on Thursday, July 11<sup>th</sup>, 2024. Competitive bid results were due to the Director of Facilities by the close of business on Friday, July 26<sup>th</sup>, 2024. Attached you will find the results of the bids that were submitted by State contract list approved roofing vendors.

**Board Motion:** “**MOVE** that the Board of Education approve the recommended company, \_\_\_\_\_, to complete the partial roof replacement at North Street School.”



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## Windsor Locks PS-- North St Roof Project

Bidder	Base Bid	Add Alternate	Total		\$/SF Deck Repair
Silktown Roofing	\$ 858,700.00	\$ 93,000.00	\$ 951,700.00		\$ 6.25
GL Capasso Inc	\$ 883,425.00	\$ 63,387.00	\$ 946,812.00		\$ 22.00
Macri Roofing	\$ 1,120,800.00	\$ 56,500.00	\$ 1,177,300.00		\$ 5.50



**EXHIBIT IX**

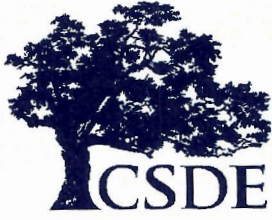
MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION

FROM: SHAWN L. PARKHURST, SUPERINTENDENT

DATE: AUGUST 29, 2024

RE: CSDE BUREAU OF SPECIAL EDUCATION INTEGRATED  
MONITORING REPORT

In late Spring, the Connecticut State Department of Education identified Windsor Locks as a district to be audited. The State spent time in our district onsite conducting file reviews and interviews with staff, students and parents. This evening, Josh Robinson, Director of Special Services, will share the State findings and areas of strength for the district and action plans to correct any targeted areas for improvement.



General Supervision – Integrated Monitoring  
 Bureau of Special Education  
 Connecticut State Department of Education

District/Program	Windsor Locks
Date	July 23, 2024
Activity	Onsite Monitoring: Public Act 23-137 (Section 48)
Contents:	Letter.....2
	Desk Audit.....4
	Service Verification.....5
	Classroom Observations.....5
	Staff Interviews.....6
	Parent Interviews.....7
	Conclusion.....8



STATE OF CONNECTICUT  
STATE DEPARTMENT OF EDUCATION



July 23, 2024

Joshua Robinson  
Director of Pupil Services  
Windsor Locks Public Schools  
58 S. Elm Street  
Windsor Locks, CT 06096

Dear Mr. Robinson:

As a condition of receiving IDEA funds, the state education agency (SEA) under IDEA Part B Sections 611 and 619 must have a general supervision system. This system includes multiple components including integrated monitoring to — (1) improve educational results and functional outcomes for infants and toddlers with disabilities and their families, and children with disabilities; and (2) ensure that local education agencies (LEAs) meet the requirements under IDEA. 20 U.S.C. §§ 1412(a)(11), 1416(a), 1435(a)(10) and 1442; 34 C.F.R. §§ 300.149, 300.600-300.604, 300.608; 303.120, and §§ 303.700-303.708.

With input from a variety of collaborators, the Connecticut State Department of Education (CSDE) has developed a vision statement for our General Supervision System.

***The CSDE envisions a high-quality, integrated system of General Supervision for the provision of special education and related services in Connecticut, resulting in positive outcomes for students with disabilities. Through a robust system of support and shared accountability our goal is to improve students' educational outcomes, empower educators, and promote an inclusive educational system that prepares all students to thrive academically, socially, and personally.***

One of the eight components of the General Supervision System is Integrated Monitoring. Integrated monitoring activities are a multifaceted formal process or system designed to examine and evaluate an LEA's implementation of IDEA with a particular emphasis on educational results, functional outcomes, and compliance with IDEA programmatic requirements.

The new state-level legislative requirements in Public Act 23-137 (Section 48), which went into effect on July 1, 2023, are a new component of the CSDE's integrated monitoring activities.

***P.A. 23-137 (Section 48). The Department of Education shall conduct audits of special education programs in randomly selected school districts each year to oversee the implementation of the Individuals with Disabilities Education Act, 20 USC 1400 et seq., as amended from time to time.***

**Such audits shall include, but need not be limited to, (1) interviewing teachers and staff who provide special education services and parents or guardians of children requiring special education, (2) conducting unannounced on-site visits to observe classroom practice and any other facet of the administration or provision of special education services in order to ensure compliance with individual education plans and all state and federal law and guidance, and (3) reviewing individualized education programs.**

The purpose of this report is to provide Windsor Locks Public Schools with a summary of the results of the integrated monitoring activity completed during the 2023-24 school year. The monitoring activities summarized within this report include the following:

1. A Desk Audit review of selected components of Individualized Education Program (IEP) and Prior Written Notice (PWN) documents for a sample of Windsor Locks students.
2. An unannounced on-site visit to four Windsor Locks Public Schools that included:
  - a. IEP service verification,
  - b. Classroom observations, and
  - c. Staff interviews.
3. Parent Interviews conducted by Connecticut Parent Advocacy Center (CPAC).

We appreciate your efforts to ensure compliance and improve results for students with disabilities. If you have any questions, please contact the Bureau of Special Education

Sincerely,



Bryan Klimkiewicz, Division Director  
Bureau of Special Education

BK/mp

## Report of Findings from Monitoring Activities

1. **Desk Audit:** The CSDE randomly selected five active student IEPs across grade levels. The selected IEPs were reviewed for compliance as well as the quality of present levels of performance and goals. Prior Written Notice documents were also reviewed for compliance and quality and rated (Poor/Fair/Good/Excellent).

### Summary of Findings:

#### IEP Reviews

- Annual Reviews completed on time.
- Three-year Reevaluations completed on time.
- Present Levels of Performance Quality Review – Generally good quality with some examples of assessment and scores not explained (e.g., “level J”).
- Annual Goals Review – Generally good quality. Ensure that goals contain a “measurable skill or behavior.”

#### PWN Reviews

- Checkboxes completed correctly.
- Overall quality of narrative information was rated as “low.” Including more specific details/information would improve the overall quality. There were some examples of more specific information found in related documents (e.g., “PPT Recommendations” section of IEP, Parent Consent Form) that could be included in the PWN narrative sections to improve PWN quality.

### Identified Noncompliance:

N/A

### Corrective Actions:

N/A

### Recommendation(s):

- If not already in place, the District should consider a systematic review process to assess the quality of IEPs and PWNs within each school and identify areas in need of further training and support.
- Advise staff completing IEPs to describe quantitative data in Present Levels of Performance in understandable terms from the parent perspective (or educator unfamiliar with the assessment).
- Ensure PWN documents Description/Reason for proposed or refused action are detailed and justifies the proposed or refused action.
- Consider the following Professional Learning Opportunities within the District:
  - IEP Quality Training (IEP Goal Development, PWN Modules)
    - Point of contact for suggested training: Georgette Nemr  
[Georgette.Nemr@ct.gov](mailto:Georgette.Nemr@ct.gov)

## 2. Site Visit Summary (March 26, 2024)

### a) Service Verification:

The CSDE integrated monitoring team conducted the IEP service verification process for 13 randomly selected Windsor Locks Public School students.

#### Results:

- The monitoring team verified services for 7 of the 13 students reviewed.

#### Potential Noncompliance (see “Required Actions”):

██████████ Academic Support – 165 minutes 1x per week in IEP; schedule indicates 75 minutes per week.

██████████ Academic Support – 135 minutes 1x per week in IEP; schedule indicates 230 minutes per week if academic support is delivered daily during iBlock, which is indicated by staff schedule. The student schedule shows 38 minutes of pull-out writing instruction, but there is no writing goal in the IEP.

██████████ Could not confirm 60 minutes per week of study skills support as the schedule indicated that this was being provided during recess and specials. The schedules did not confirm the provision of individual or group counseling services as specified in IEP.

██████████ Could not confirm with schedules that the student is receiving 195 minutes of transition services, 195 minutes of mathematics support and 195 minutes of Reading/Writing instruction per week based on the schedules provided.

██████████ Based on the student’s schedule, they are receiving 740 minutes of special education per week, not the 690 indicated in IEP.

██████████ Academic Skills – 150 minutes 1x per week could not be confirmed by schedule. Could not confirm 20 minutes per week of counseling in the schedule.

#### Recommendation(s):

- Related to frequency and duration of services documented in the IEP, use smaller time segments whenever possible. Example: Instead of 300 minutes 1x per week, use 60 minutes 5x’s per week.
- In some instances, it was difficult to verify services due to the practice of documenting frequency and duration of special education and related services in terms of minutes per week, which does not always align with the actual minutes reflected in the schedule, in particular at the secondary level when the schedule does not align to a 5-day rotation. Review with staff at the secondary level CT-SEDS functionality that permits service hours to be documented in accordance with the schedule rotation (e.g. minutes per 6-day rotation)

- b) **Classroom Observations:** A team of four (4) monitors completed observations in 16 settings across the District’s four schools: North Street Elementary School, South Elementary

School, Windsor Locks Middle School and Windsor Locks High School. Observations of special education students occurred in general education settings, special education and resource room settings, and while related services were being provided.

**Notes and Commendations:**

- High-quality inclusive supports and co-teaching observed at the secondary level. Students with disabilities were observed engaging in lessons in general education settings working alongside and interacting with typical peers.
- Special education teachers, general education teachers and paraeducators were observed as being adept and nimble with providing the appropriate supports based on student needs in the moment, ranging from gentle guidance to more intensive re-engagement strategies, including observed de-escalation strategies for students exhibiting dysregulated behavior.
- Appropriate and creative use of technology integration was observed across a variety of settings, including technology to support whole group, small group, individual instruction, and independent work.
- Generally speaking, the culture of the schools in Windsor Locks feels very inclusive. All members of the site visit team observed students of various needs successfully integrated into general education settings with appropriate supports.
- Classroom arrangements, and the proximity of students to one another and to teachers and paraeducators, reflected inclusive yet highly supportive classroom environments.
- The preschool classrooms are exemplary. Children are nurtured and supported, while independence is clearly being fostered among both children with special needs and typical peers. Young children in these classrooms are experiencing inclusion and acceptance as the norm, setting the stage for an inclusive culture as students progress through the grade levels.
- All schools appeared to have established a positive and encouraging climate and culture as evidenced by the observed positive behavior supports as well as the students' interactions with their teachers.

**Noted Concerns:**

N/A

**c) Staff Interviews:**

- Staff reported that they are very happy to work in Windsor Locks Public Schools. They acknowledged a wonderful sense of collegiality and cooperation within and across schools, and disclosed that they are very devoted to their students and families.
- Due to training, support, and time for collaboration, the SRBI process is becoming better understood, especially at the elementary level; staff appreciate the structure and framework to inform programming for students and would like for the administration to continue to support refinement of the process.
- Staff spoke to strong parent engagement and communication practices in place, including use of Parent Square for regular check-ins and communication with families.

- Special education staff would like more time for collaboration as a department and would also like more time for collaboration with general education staff.
- Special and general educators would like more opportunities to share and collaborate over accommodations and modifications and adapting curriculum and assessments.
- At the elementary level, related services staff are extremely flexible and work creatively to provide service delivery in the LRE.
- The biggest challenges reported by staff include: a lack of resources, training and support to address student mental health needs; tier 1 strategies for behavior at the elementary level; and coping with the number of staff vacancies and need for coverage on a daily basis.

**Staffing Support Considerations:**

- Examine staffing shortages and the impact this is having on staff being assigned different or additional duties and responsibilities.
- Evaluate current schedules to identify more opportunities for collaboration within special education and across general education and content area departments.
- Requests for training and professional learning opportunities:
  - a) CT-SEDS
  - b) Writing transition goals
  - c) Tier 1 behavior management strategies
  - d) SRBI (especially at the secondary level)
  - e) Supports for dyslexia (especially at the secondary level)

**Programming and Policy Recommendations:**

- Continue to refine SRBI structures and processes.

**Parent Interviews:**

The Connecticut Parent Advocacy Center (CPAC) reached out to 236 families of students with disabilities in Windsor Locks. Families were asked via email if they would like to participate in a phone interview to share their experiences with special education in the district. Six parents participated in either a telephone interview or an online survey (5 completed the survey). Please click on the following link to access the summary of responses: [Windsor Locks Parent Survey](#).

Positive and trusting relationships and consistent, proactive communication with families provides a strong foundation for the special education team process. The CSDE encourages the district to continue to build on its efforts to engage families and involve them in their child's education program. For additional resources regarding family involvement and engagement, please visit [School-Family-Community Partnerships--Related Resources \(ct.gov\)](#) and [Connecticut Parent Advocacy Center - CPAC \(cpacinc.org\)](#).

**Required Actions:**

- **Service Verification**
  - Please review the six cases documented above and reply to Michael Tavernier at: [michael.tavernier@ct.gov](mailto:michael.tavernier@ct.gov) with your findings and any actions that were taken no later than Friday, August 16, 2024.

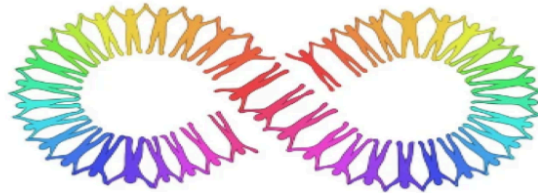


- **Staff Interviews**

- Please provide the CSDE with a list of the current special education vacancies within the district (including but not limited to: Special Education Teachers, Paraeducators, Related Service Providers).

**Conclusion:**

The integrated monitoring team would like to thank Windsor Locks Public Schools for its cooperation, administrative support, and participation in this process. The CSDE appreciates the communication and coordination between the central office and school leadership, which was critical in making the monitoring visit productive and successful. Thank you for your efforts to ensure compliance and improve educational and functional results for students with disabilities.



Windsor Locks Pupil Services

Integrated Monitoring Review

## Purpose and method of the Integrated Monitoring Visit

- New Legislative requirements in Public Act 23-137 (Section 48) requires the Department of Education to provide random audits on the implementation of the Individuals with Disabilities Education Act.
- The Site visit included:
  - *Interviews - General Education Teachers, Special Education Teachers, ParaEducators and parents or guardians of children requiring special services.*
  - *Unannounced on-site visits to schools to observe classroom practices and check for IEP compliance.*
  - *Reviewed 13 random IEPs to check for compliance and verify services at central office.*

## Desk Audit – IEP Review

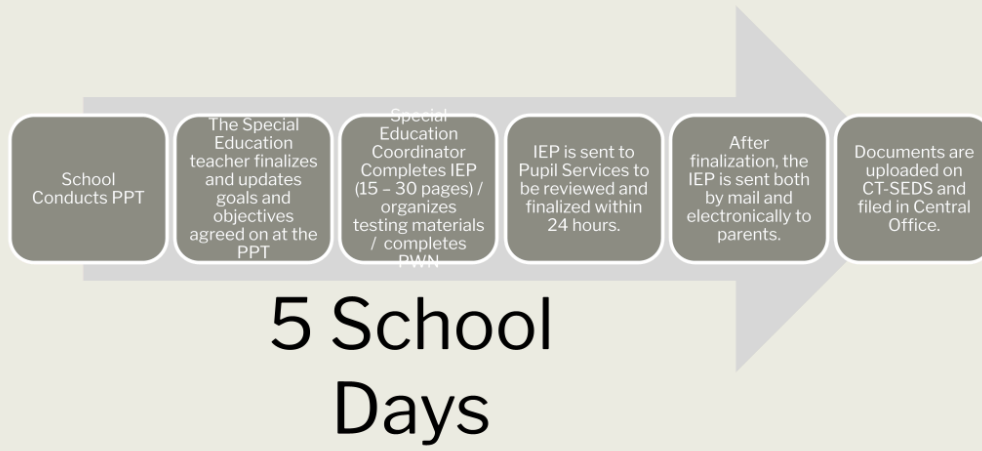
- Summary of Findings:
  - Annual reviews completed on time
  - Three-year evaluation completed on time
  - Present Levels of Performance Review – “Generally Good quality...”
  - Annual Goals Review – “Generally Good Quality”
  - Prior Written Notice – Checkboxes Completed correctly

**7 out of 13 IEPs required additional review. After additional review of student schedules “non-compliance was not identified, the district is not required to take any action.”**

## Desk Audit – IEP Review

- **Recommendations for Improvement**
  - Implement a systematic review process to assess the quality of IEPs and Prior Written Notice (PWN) within each school and identify areas in need of further training.
  - Advise staff completing IEPs to describe the quantitative data in Present Levels of Performance in parent friendly language. (Move away from technical language)
  - The overall quality of narrative information was rated as “low” including more specific details / information would improve overall quality. Ensure PWN documents description and reason for the proposed or refused action are detailed and justify the action.
  - Shift how we document services hours – From weekly duration to daily duration.
  - Continue utilizing IEP Quality training (Focus on goal development / PWN)

# WLPS Current Review Process



## Additional Review Process for 2024 – 2025 school year.

- Random Audit of one elementary and one secondary IEP every other week during Special Education Coordinators meeting.
  - *Audit will focus on:*
    - PWN
    - Measurable goals and objectives
    - Quantitative data written in parent friendly language
    - Maintenance of effort – review if goals are rigorous and focused on moving students towards mastery of grade level standards.

# What is Prior Written Notice

- Prior Written Notice is a form letter that describes the decisions made during a PPT.
- What kinds of decisions are discussed in this letter?
  - *Changes to the students special education services*
  - *Decisions on eligibility for special services*
  - *Student Placement (Public School, Outplacement)*
  - *A recap of evaluations provided to assess students growth towards goals and objectives.*
- Why is this important?
  - *It provides parents with an update on their child's educational plan*
  - *Provides parents with an opportunity to ask questions or disagree with the PPTs decisions.*

# Improvements to PWN

- Move away from legal ease to a more parent friendly narrative that clearly describes all of the decisions made at the PPT.

## PWN Questions

- Description / reason of proposed or refused action
- The reason for proposing or refusing action is:
- Description of each evaluation procedure, assessment record, or report the school district used as a bases for proposed or refused action:

**Prior Written Notice**  
(S.L.C.R. § 300.005)

*Document intended for internal use only—data must be entered in CT-0026*

**PURPOSE:** As a prerequisite of a student or an adult student suspended of receiving or receiving special education services, the school district is required to provide you with prior written notice whenever it proposes or refuses to initiate or change the identification, evaluation, educational placement or provision of a free and appropriate public education (FAPE) to your child. This notice should be given to you after a district makes a decision and 10 school days before action is taken on the decision, unless the school district and you both agree to an earlier implementation date.

To: \_\_\_\_\_ Date: \_\_\_\_\_  
Parent/Guardian/Child Student      Ref: \_\_\_\_\_  
Student Name

SAID: \_\_\_\_\_

**ACTION(S) PROPOSED/REFUSED**

(Insert District Name) Public Schools is providing notice of the following: (select one or more of the following)

1. <input type="checkbox"/> The District is proposing to	2. <input type="checkbox"/> initiate	3. <input type="checkbox"/> identification/eligibility
<input type="checkbox"/> The District is refusing the request to	<input type="checkbox"/> change	<input type="checkbox"/> an evaluation
		<input type="checkbox"/> an educational placement
		<input type="checkbox"/> the provision of FAPE (IEP)

**DESCRIPTION / REASON**

Description/Reason of the proposed or refused action:

The reason for proposing or refusing to take action is:

Description (including the date) of each evaluation procedure, assessment, record, or report the school district used as a basis for the proposed/refused action:

Date this action will take effect:

Other options the PPT considered and rejected:

instruction in the general education environment with supplementary aids and services

no other options were considered and rejected

Other:

Reason for rejecting other options:

The student would not receive an appropriate program in the least restrictive environment.

Other:

Other factors that are relevant to this action:

There are no other factors that are relevant to the PPT decision

Other:

July 2022
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## Frequency and Duration of Services

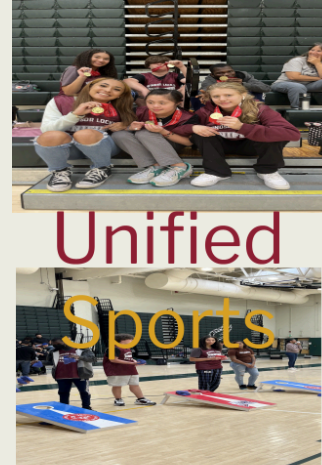
- Current IEPs list service hours on a weekly basis.
  - *For example – Josh will receive 900 minutes per week of ParaEducator support...*
- Requested Shift for 2024 – 2025
  - *Josh will receive:*
    - Monday – 180 Minutes ParaEducator support in Math and ELA
    - Tuesday – 180 Minutes of ParaEducator support in Math and ELA
    - Wednesday - 180 Minutes of ParaEducator support in Math and ELA
    - Thursday - 180 Minutes of ParaEducator support in Math and ELA
    - Friday - 180 Minutes of ParaEducator support in Math and ELA

## Present Levels of Performance

- *Advise staff completing IEPs to describe the quantitative data in Present Levels of Performance in parent friendly language. (Move away from technical language)*
  - *Shift away from general statements like, “Student is reading at level J.”*
  - *Shift towards - Josh is reading approximately two years below grade level as evidenced by his WIAT-4 Core reading assessment. This assessment demonstrated that Josh is experiencing difficulties with decoding, fluency, and comprehension of grade level text. This deficit impacts overall academic performance and limits access to grade level curriculum.*

## Site Visit Feedback

- High-quality inclusive supports and co-teaching observed at secondary level.
- Special education teachers, general education teachers, and paraeducators observed be adept and nimble with providing appropriate supports based on the students needs – Observed gentle guidance to more intensive engagement strategies / de-escalation strategies for students exhibiting dysregulated behavior.
- Observed creative use of technology integration across of a variety of settings.
- The culture of the schools in Windsor Locks feels very inclusive. All members of the site team observed students of various needs successfully integrated into general education classrooms with appropriate support.



## Site Visit Review Highlights

- The preschool classrooms are exemplary. Children are nurtured and supported, while independence is clearly being fostered among both children with special needs and typical peers. Young children in these programs are experiencing inclusion and acceptance as the norm, setting the stage for an inclusive culture as student progress through the grade levels.
- All schools appeared to have established a positive and encouraging climate and culture as evidenced by the observed positive behavior supports as well as the students' interactions with the teachers.



## Staff Feedback

- Staff reported that they are happy to work in WLPS. They acknowledge a wonderful sense of collegiality and cooperation within and across schools, and disclosed that they are very devoted to their students and families.
- Staff is feeling more comfortable with the SRBI process (especially at the elementary level). The staff appreciate this structure and framework to inform programming for students and would like administration to continue to support refinement of this process.
- Staff spoke to strong parent engagement and communication practices in place, including the use of Parent Square...
- Staff at the elementary level provided praise to related services for being flexible and creative in providing service delivery in the least restrictive environment.

## Staff Feedback

- Special Education staff would like more time for collaboration as a department and more time to collaborate with general education staff about adapting the curriculum/assessment tools and implementing accommodations and modifications.
- The staff (General Education / Special Education) would like to have more:
  - *Resources (Curriculum supplies to help with differentiation)*
  - *Training and support to address mental health*
  - *Tier 1 strategies (SRBI supports for behavioral supports)*
  - *They would like to be fully staffed*



## Parent Feedback

- SERC reached out to 236 families in Windsor Locks.
  - *They received six responses to phone interviews and completion of online forms.*
- Questions:
  - *What has worked well, or hasn't worked well?*
    - The school my child attends does a very good job of working with parents to schedule meetings. I felt like they were really listening to me and they did a great job of implementing IEP goals and accommodations that will help my child be successful. We have had a very positive experience!
    - Zoom meeting have made PPT meetings convenient for all. I haven't received paperwork electronically after the meetings though. It has to be printed and sent home with my child.
    - I get a detailed progress report each marking period. I receive one for his general education and one specific to his IEP goals. Both are similar in format and easy to understand. If I have questions or concerns, my child's teachers are always available.
    - I wish I was informed more about the testing process.
    - The reporting can be a little confusing and I don't know all of the terminology used in meetings.
    - Asking me to miss work for meetings and testing is difficult

## Parent Feedback

- Questions:
  - *If you contact the school, do staff members respond in a timely manner?*
    - 100% answered yes
  - *On a scale from 1-5 (with 5 being the best) how satisfied are you with your child's special education services and support?*
    - 40.0% Neutral
    - 60.0% Very Satisfied
  - *Do you think that the information/data used to determine the IEP services is easy to understand, adequate, and relevant?*
    - 40% Yes
    - 60% No
      - *"Sometimes the report is a little confusing or the terminology is something I don't understand, but I've always had that clarified when I asked about it."*
      - *"I prefer notes, not graphs"*

# Parent Feedback

- Questions:
  - *What data are shared with you regarding your child's progress? Is the information easy to understand?*
    - "Yes, not so much the data as teacher notes."
    - "I get a detailed progress report each marking period. I receive one for their general education and one specific to his IEP goals. Both are similar in format and easy to understand. If I have questions or concerns, my child's teachers are always available."
    - "Progress reports and sometimes."
    - "I receive all goals and benchmarks. Along with report cards I receive progress reports listing current progress. All goals include descriptions that make understanding goals easier."
  - *How effective is the communication between yourself and the school personnel regarding your child's special education services?*
    - 20% Fair
    - 20% Good
    - 60% Excellent

# Areas for Growth

## **State Visit Feedback**

- 1) Write measurable goals / present levels of performance in parent friendly language.
- 2) Write a narrative in PWN that explains the districts decision to revoke or provide services.
- 3) Update process for capturing duration of services in IEPs
- 4) Look for opportunities to provide more time for special education staff to collaborate as a department and with general education teachers.

## **Staff Feedback**

- 1) Provide additional professional development in conjunction with building administrators on tier 1 behavioral supports
- 2) Provide additional training on mental health supports
- 3) Continue refinement of SRBI Process.

## **Parent Feedback**

- 1) Provide parent friendly language on reports
- 2) Continue improvements in communication
- 3) Provide additional discussion time on dispute resolutions at meetings - Beyond legal statement and parental safeguards documentation.
- 4) Provide additional educational resources on school website.

## Vacancies

If there is a staffing vacancy that impacts the implementation of a student's IEP:

- 1) Pupil Services will communicate with the parents of student(s) impacted by the vacancy;
- 2) Pupil Services will continue to employ creative solutions to provide full IEP services while working to fill vacant positions;
- 3) Pupil Services will review individual student IEPs to assess implementation of special education and related services;
- 4) Pupil Services will create a system to track any IEP services not being provided;
- 5) Pupil Services will develop a plan to assess the need for compensatory services and the provision of those services; and
- 6) Pupil Services will provide ongoing communication to parents on students impacted by vacancies regarding staffing issues, the impact of staff shortages on the provision of IEP services, and the plan to address missed services.

# QUESTIONS

**EXHIBIT X**

MEMORANDUM TO: MEMBERS OF THE BOARD OF EDUCATION  
FROM: SHAWN L. PARKHURST, SUPERINTENDENT  
DATE: AUGUST 29, 2024  
RE: 24-25 MEDICAL INSURANCE PRESENTATION

In late August, the district was made aware of an insurance funding issue for the 24-25 year. This evening, Chris Monroe, will share a presentation on the issue and potential solutions and implications for the future.

**Windsor Locks Public Schools**

[www.wlps.org](http://www.wlps.org)

**Educational Leadership**

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**Superintendent of Schools 860-292-5000**

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