



**FourPoint**  
Education Partners

Hartford Public Schools

# Independent Monitoring Report: HPS Action Plan Implementation



4/3/18

## Table of Contents

---

Introduction	3
Report Two Methodology	4
Overarching Findings	6
Findings by Concern Area	9
Overarching Recommendations	55
Appendix: Interviewees	57

## Introduction

---

Hartford Public Schools contracted with FourPoint Education Partners in October 2017 to monitor its implementation of an action plan in response to a sobering report from the State of Connecticut’s Office of the Child Advocate (OCA) regarding the district’s compliance with state laws related to mandatory reporting of child abuse and neglect.<sup>1</sup> In December 2017, FourPoint submitted the first of three monitoring reports.<sup>2</sup> The initial report focused on contextual factors impacting the district’s ability to successfully change policies, practices, and culture to ensure student safety and well being. It also considered the extent to which action plan implementation is likely to improve HPS’ prevention, identification, reporting, and response to incidences of child abuse and neglect as well as sexual discrimination, harassment, or abuse within the school community. Finally, the report outlined nine recommended preliminary steps HPS can take to ensure effective implementation of the action plan and included a number of metrics that the district could use to measure its progress.

The first report, by design, did not assess HPS’ implementation of the action plan. Rather, it outlined a methodology that FourPoint would use to assess district implementation in this, its second report. The sections that follow summarize the steps that HPS has taken to date to implement its action plan and assess its progress in accomplishing indicators of success. The monitoring team has also developed a series of recommendations regarding revisions to the action plan or areas that require further attention or support.

FourPoint will submit a third and final report to HPS in June 2018 following another site visit in April 2018. This third report will:

- 1) Describe additional steps that HPS has taken to implement its action plan and assess the degree to which it has accomplished indicators of success.
- 2) Summarize the monitoring team’s analysis of the extent to which HPS has achieved its larger goal of creating school environments in which all students feel safe and ready to learn.
- 3) Summarize results of planning efforts that HPS will take with FourPoint to transform its action plan into an implementation plan, a key recommendation of this report.

---

<sup>1</sup> Connecticut Office of the Child Advocate. *Investigative Report Regarding Compliance of Hartford Public Schools with State Laws Regarding Mandated Reporting of Child Abuse and Neglect*. Author, Feb. 2017. <https://www.hartfordschools.org/wp-content/uploads/2017/02/OCA-Report-HPS-2017.pdf>

<sup>2</sup> FourPoint Education Partners. *Hartford Public Schools Independent Monitoring Report: Context and Methodology*, Author, Dec. 2017. [https://www.hartfordschools.org/wp-content/uploads/2018/01/HPS\\_Monitoring-Report-One\\_Final\\_122017.pdf](https://www.hartfordschools.org/wp-content/uploads/2018/01/HPS_Monitoring-Report-One_Final_122017.pdf)

## Report Two Methodology

---

The methodology for this report was described in detail in FourPoint’s first report to HPS.<sup>3</sup> In summary, FourPoint sought to answer three research questions:

- 1) To what extent has HPS addressed each of the nine overarching concerns identified by OCA?
- 2) To what extent has HPS implemented each of the 59 action steps supporting the nine concerns?
- 3) To what extent has HPS demonstrated progress on each of the high-level indicators of success developed by FourPoint?

FourPoint gathered information and data pertaining to action plan implementation during a January 24-26, 2018 visit to HPS. While on site, members of the monitoring team interviewed and held focus groups with approximately 110 individuals—including district administrators, principals, teachers, parents, advocates, and service providers—and collected additional extant data and implementation artifacts. Following the visit, FourPoint analyzed data, reviewed artifacts, and applied the monitoring methodology to evaluate HPS’ implementation progress.

The first step in evaluating progress involved summarizing what the district has done to address each action step in the plan. FourPoint then considered whether implementation of each step was full, partial, or not yet started, as well as the extent to which HPS was meeting the indicators of success tied to each action step. The monitoring team then color-coded each step, using “red” to indicate that the action step has not yet been implemented or is off track, “yellow” to indicate that HPS has partially implemented the action step, but that it needs additional attention, and “green” to indicate that the action step has been completed.

FourPoint also assigned general ratings to each concern area by considering the level and quality of implementation of action steps related to each area. This was done using the following five-point scale:

---

<sup>3</sup> Ibid.

- 1 - Few or no action steps are fully implemented and/or significant questions remain about quality of implementation
- 2 - Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality
- 3 - All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions
- 4 - HPS has implemented action steps in a way that moves beyond compliance and has changed district culture
- 5 - HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement.

Given HPS' relatively early stage of implementation, neither FourPoint nor district leaders anticipated receiving ratings of 4 or 5 in this assessment and report. However, these levels have been included to encourage continuous improvement and enable the district to continue to refine its implementation approaches so that it reaches its ultimate goal of culture change in central office and schools.

In addition to findings and ratings, FourPoint offers a number of suggestions for improved action plan implementation for each concern area and in the Overarching Recommendations section of this report.

## Overarching Findings

---

FourPoint’s detailed findings are included in the monitoring tool. However, several key findings merit highlighting:

- 1) HPS has largely addressed the central challenge identified in the OCA report—the lack of reporting and prompt and full response to suspected child abuse, neglect, and harassment of students by employees. To address this challenge quickly, the district has insisted—as required by law—that all HPS staff report any and all instances in which students are *possibly* being mistreated by school or district staff and has enacted disciplinary measures for those who do not fulfill their mandated reporting duties as well as staff who are the subject of reports. This emphasis on comprehensive and uniform reporting and consequences was necessary and important. However, as the detailed findings show, it has also led to significant increases in reports and introduced some confusion and fear among school leaders and staff as well as disruptions in teaching and learning as some educators and staff are placed on administrative leave, substitutes are deployed to fill staffing gaps, and school and district leaders’ time and attention is spent fulfilling reporting obligations.

HPS is now in a position where it must balance a firm and aggressive stance on child abuse, neglect, and harassment with a need to help school staff use professional judgment in making reports versus dealing with inappropriate professional conduct within the school and district. Program concerns issued in unsubstantiated reports (and data related to reports that are not “picked up” by DCF) can also help the district to identify re-occurring challenges related to professional conduct and/or needs for additional professional learning, alternate staffing patterns, and/or other supports to schools to ensure safe learning environments.

- 2) To strike this delicate balance, principals must be engaged in a meaningful way. Currently, district administrators engage principals through training and communication of expectations. The superintendent has also met individually with principals to discuss concerns or issues they are having with implementation. Going forward, it will be critical that the new project manager and superintendent meet regularly with principals to uncover and address issues related to reporting of suspected abuse and neglect, effectively addressing program concerns issued by the Department of Children and Families, improving school culture, tracking

improvements of school culture, and using data effectively to support those improvements.

- 3) While HPS is making progress implementing the action plan, project management and cross-departmental coordination can be improved. Since the beginning of this work, Superintendent Torres-Rodriguez has repeatedly pointed to a need for increased capacity building within central office in order to fulfill both the activities and intent of the action plan, ultimately improving culture and climate in schools district wide. In its initial report, FourPoint highlighted several issues related to effective implementation of the plan, including its integration into other district work. Since that time, district leaders have embedded student-safety measures into its Key Performance Indicators and identified how school safety fits within its larger improvement strategy. A new Deputy Superintendent is working with central office leaders to clarify roles and responsibilities and improve communication and workflow across divisions. A Systemic Continuous Improvement Team has been established with a goal of better using data to drive implementation and improvement in the district.

The district has not, however, yet addressed several key recommendations, including developing an implementation plan or identifying a new project manager with authority to direct and coordinate the work of multiple offices as they undertake implementation. Findings in this report highlight the importance of multiple offices and schools working together in a coordinated, thoughtful, data-informed way to ensure that the district is compliant with state laws, able to fully implement the activities laid out in its action plan, and achieve its overarching student safety goals. Project and performance management will require both greater and sustained attention for the district to reach its goals.

- 4) The district has made important progress in addressing OCA concern areas and implementing action steps. Most of this progress to date comprises relatively straightforward steps that the district has taken to communicate expectations, train staff, and improve systems for reporting. What remains, not surprisingly, are the more complicated and ambiguous tasks that will ultimately transform school and district culture: Creating a deep and universally held understanding of reporting requirements and disciplinary consequences; continuing to improve systems of support for students impacted by abuse, neglect, or harassment; ensuring supports for the district's most vulnerable students; using data to pinpoint and address challenges on an ongoing basis; continuing to refine and use

communications mechanisms with families and the community, etc.

HPS' partnership with DCF—formed in response to the OCA report—stands out as a mechanism that is allowing the district to uncover and substantively address issues related to child abuse and neglect and its reporting. It can serve as a model for how internal and external stakeholders can use data to solve problems transparently and effectively.

- 5) Special education services continue to be an area of concern among district stakeholders, who repeatedly raised questions about whether the district is meeting its obligations for providing a full continuum of services, whether student's Individualized Education Programs are being implemented with fidelity, and about the quality of services and supports currently available to HPS' students with disabilities. District leaders have recently created a new plan for improved special education programs and services and their oversight. It is critical that the district ensure this plan comprehensively addresses its ongoing needs and is implemented in full.

## Findings by Concern Area

---

Detailed findings are presented in the rubric that follows. For all nine OCA concern areas, FourPoint rated implementation of each action step (using red, yellow, and green) and presented evidence for each rating. FourPoint then provided a rating on a 1-5 scale that assesses the extent to which the district has addressed each OCA concern through its implementation of related action steps.

Again, it should be noted that a rating of a 3 indicates that the district has fully addressed the concern area. To earn a rating of a 4 or 5, the district must have begun to change culture and incorporate performance management processes, respectively. FourPoint acknowledges that a rating of a 4 or 5 is unlikely given the early stage of action plan implementation.

## Concern Area and Action Step Findings

OCA Concern 1 Strand: Human Resources & Labor	FourPoint Rating of HPS Implementation
1. Failure to exercise appropriate diligence in the review of and action on allegations against Eduardo Genao.	4

### Rubric for Overarching Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

### Rubric Rating Rationale

- Hartford Public Schools has addressed each of the two action steps related to this concern area. Because the first involves staff who are no longer employed by the district, no additional follow up is needed. The second action step has been completed and recommendations from the Shipman & Goodwin have also been addressed.
- Since the time of allegations against Mr. Genao in 2016, the district has adopted a “no tolerance” stance on abuse or neglect of students in the system. Many stakeholders report a belief that current district leadership would handle a similar incident swiftly and soundly, suggesting a positive shift in district culture.

Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
<p>1. Review handling of allegations against Mr. Genao in 2016 and hold those failing to fulfill their required reporting duties to account.</p>	<ul style="list-style-type: none"> <li>• Systematic review process used</li> <li>• Report completed</li> <li>• Report disseminated widely</li> <li>• Relevant individuals disciplined or trained as appropriate</li> </ul>	
<p>Evidence of Implementation</p>		
<ul style="list-style-type: none"> <li>• According to OTM leaders, no official review of the handling of allegations against Mr. Genao has been conducted by HPS; the district relies on the account included in the February 2017 OCA report.</li> <li>• Hartford Public School staff who were involved in the handling of those allegations are no longer employed in the district, making further investigation and disciplinary actions unnecessary.</li> </ul>		
<p>2. Outside review of administrative actions and decision-making regarding allegations against Mr. Genao in 2007, including:</p> <ul style="list-style-type: none"> <li>• Identify mandated reporters who were aware of Mr. Genao’s conduct and did not report on such conduct, and hold those responsible to account.</li> <li>• Identify responsibility for failures to exercise due diligence in investigating and responding to allegations against Mr. Genao, and hold those responsible to account.</li> <li>• Identify responsibility for failure to appropriately document findings concerning Mr. Genao’s conduct, and hold those responsible to account.</li> <li>• Identify responsibility for providing the superintendent and the board of education with relevant information concerning the findings as to Mr. Genao’s conduct, and hold anyone failing to do so to account.</li> </ul>	<ul style="list-style-type: none"> <li>• Mandated reporters who were aware of Mr. Genao’s conduct and did not report on such conduct identified and held to account</li> <li>• Responsibilities for investigating and responding to allegations against Mr. Genao identified, and individuals neglecting these held to account</li> <li>• Responsibilities for failure to appropriately document findings concerning Mr. Genao’s conduct identified, and individuals neglecting these held to account</li> <li>• Responsibilities for providing superintendent and the board of education with relevant information concerning the findings as to Mr. Genao’s conduct identified, and individuals neglecting these held to account</li> </ul>	

## Evidence of Implementation

- Shipman & Goodwin LLP conducted a thorough review of administrative actions and decision-making regarding allegations against Mr. Genao in 2007, which was delivered to Superintendent Torres-Rodriguez on December 3, 2017.
- Recommendations from that review included meeting with individuals who had failed to report suspected behaviors by Mr. Genao in 2007 to DCF and providing them with proper instruction and training. OTM leaders have met with those staff members who are still employed by the district and are assured that these individuals now understand their mandatory reporting obligations.
- Shipman & Goodwin further recommended that HPS revise its policies and administrative regulations to require that administrators review personnel files for any internal candidates for open positions. According to OTM leaders, the district adopted a new practice of reviewing personnel files for internal candidate well before the release of the OCA report and subsequent Shipman & Goodwin review. That practice is documented in a formal OTM protocol for internal hiring.

^Include timeline and/or date completed as appropriate

\*Red=not started or off track; Yellow=started and on track; Green=completed

## Concern Area 1 Recommendations

FourPoint considers these actions complete and has no further recommendations related to this concern area.

OCA Concern 2 Strands: Professional Development, Policy & Compliance	FourPoint Rating of HPS Implementation
2. Staff failure to comply uniformly with mandatory child abuse and neglect reporting requirements.	2

Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

Rubric Rating Rationale

- Hartford Public Schools has addressed most of the action steps related to this concern area, though questions remain about two specific steps, their meaning, and what successful implementation would look like for the district (see steps 4 and 10).
- The district has shored up many of the compliance issues related to mandatory reporter training and report monitoring. It continues to rely on statutory definitions of abuse and neglect, and has taken some steps to promote those definitions and disciplinary consequences for engaging in abusive or neglectful behaviors or failing to report a suspected incidence. Further, HPS has developed and enacted a report and abuse checklist that school leaders now use to address reports of suspected incidences in schools.
- There is, however, a continued and urgent need to develop a more concrete, universal understanding of what constitutes abuse and neglect by employees. This includes reaching clarity about which behaviors are aligned with the DCF/statutory definitions for abuse and neglect versus those behaviors that may not fit those definitions but still break with the district’s expectations for employee professional conduct and how processes for handling each differ.

### Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
<p>1. Research and obtain outside expertise to develop more comprehensive understanding of “abuse,” including grooming behavior, and of “neglect,” including failure to provide appropriate supervision.</p>	<ul style="list-style-type: none"> <li>• Research conducted on outside expertise</li> <li>• Outside expertise hired</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• HPS continues to rely on the definitions of abuse and neglect included in state statute (Connecticut General Statute 46b-120) and promoted via CT mandatory reporter training for school employees. These definitions and related evidence can also be found on the DCF website at: <a href="http://www.portal.ct.gov/DCF/Policy-Homepage/Chapter-34/34-2-7">http://www.portal.ct.gov/DCF/Policy-Homepage/Chapter-34/34-2-7</a>.</li> <li>• While grooming behaviors are listed as evidence of sexual abuse/exploitation, HPS has not updated formal policies or definitions to include examples of these behaviors. The district has developed a self-evaluation to clarify ways in which failure to provide appropriate supervision to a child can qualify as neglect, though it is unclear how many staff have received and/or used that tool.</li> <li>• While HPS’ formal definitions have stayed close to those set out by DCF and in legislation, district leaders describe their next level of work to be to further unpack those definitions to develop a more concrete, universal understanding of what constitutes abuse and neglect by school employees. This includes reaching clarity about which behaviors are aligned with the DCF/statutory definitions for abuse and neglect versus those behaviors that may not fit those definitions but still break with the district’s expectations for employee professional conduct.</li> </ul>		
<p>2. Define and publicize what conduct between a staff member and a student is prohibited, including contact through social media.</p>	<ul style="list-style-type: none"> <li>• Inappropriate conduct defined using high-quality references</li> <li>• Definition communicated widely</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• As noted above, HPS relies primarily on DCF’s working definitions of abuse and neglect (Educational Neglect, Emotional Maltreatment – Abuse, Emotional Neglect, Medical Neglect, Moral Neglect, Physical Abuse, Physical Neglect, and Sexual Abuse/Exploitation), as well as DCF-articulated examples of evidence indicative of each type of abuse or neglect. Definitions for each type of abuse or neglect are promoted through the mandatory reporting training. This training does not, however, include the evidence types included on the DCF website.</li> <li>• The HPS Employee Handbook (dated 1/2017 and updated/disseminated annually) lists “behaviors [that] illustrate major interference in the educational process and represent the kinds of conduct that may result in immediate corrective action up to and including termination of employment with the Hartford Public Schools” including: <ul style="list-style-type: none"> <li>– any substantiation of neglect or abuse or otherwise from the Department of Children and Families;</li> <li>– the use of threatening or abusive language to supervisors, colleagues, students, parents, or community members;</li> <li>– participating in horseplay in the workplace or with students, or the deliberate destruction of Hartford Public Schools’ property or the property of an</li> </ul> </li> </ul>		

<p>employee or student;</p> <ul style="list-style-type: none"> <li>– mistreatment or abuse of students, staff, or other individuals;</li> <li>– threatening, intimidating, coercing, or interfering with fellow employees and/or students; and</li> <li>– inappropriate relationships with students or staff, <i>including through social media</i>.</li> </ul> <ul style="list-style-type: none"> <li>• HPS also disseminates the Connecticut Codes of Responsibility for Teachers and Administrators annually, which indicate that teachers shall not: (A) Abuse his or her position as a professional with students for private advantage; (B) Sexually or physically harass or abuse students; (C) Emotionally abuse students; or (D) Engage in any misconduct which would put students at risk. And administrators shall: (12) Ensure that all students are provided educational opportunities in environments safe from sexual, physical, and emotional abuse.</li> <li>• Further, leaders from OTM have developed and begun to administer training to further delineate and publicize prohibited behaviors between staff and students (see concern area 2, action step 6).</li> </ul>		
<p>3. Publicize disciplinary rules applicable to all staff, including administrators, for engaging in abusive or neglectful behaviors, or failing to report suspicion of abuse or neglect, with clear consequences.</p>	<ul style="list-style-type: none"> <li>• Disciplinary rules developed using high-quality references</li> <li>• Clear consequences for breaking rules developed</li> <li>• Rules and consequences communicated widely</li> <li>• Rules and consequences implemented consistently</li> </ul>	
<p>Evidence of Implementation</p>		
<ul style="list-style-type: none"> <li>• The HPS Employee Handbook (distributed annually) indicates that employees demonstrating behaviors consistent with abuse, neglect, or mistreatment of students may receive corrective action up to and including termination.</li> <li>• HPS leaders are using “progressive discipline” – letter of counsel, verbal warning confirmed in writing, reprimand, additional training requirements, suspension, and termination – to address employee misconduct (see also concern area 3, action step 8). According to February 2018 OTM data, 76 HPS staff members have been placed on administrative leave since August 2017 in connection with a child abuse or neglect report, 28 staff members are currently on leave pending a DCF investigation, and the district is pursuing more advanced disciplinary measures (e.g., termination) with nine staff members following internal and DCF investigations. Between February 2017 and May 2017, eight staff members were placed on administrative leave in connection to abuse or neglect reports.<sup>4</sup></li> <li>• The district’s increasing use of advanced discipline (i.e., administrative leave, suspensions and terminations) has reportedly made it clear that abuse/neglect will not be tolerated within the system and that there are significant consequences for those behaviors and/or failing to comply with reporting duties.</li> </ul> <div data-bbox="1585 922 1932 1161" style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p><i>“The superintendent has thrown the gauntlet down when it comes to safety of students. There’s no a no tolerance policy.”</i></p> <p>– District administrator</p> </div>		

<sup>4</sup> OTM provided two files containing information about staff who have been placed on administrative leave in relation to a child abuse or neglect-related incident for the current school year. Each file is maintained by a different subset of OTM staff. While the numbers were close, there were some discrepancies between the files. OTM leaders report that as part of their tracking upgrades, they are moving towards a single system for tracking and maintaining information for staff involved in child abuse or neglect reports (including those who have failed to report suspected abuse/neglect) and related disciplinary actions.

<ul style="list-style-type: none"> <li>School leaders and staff reported that a lack of clarity around definitions of abuse and neglect versus inappropriate professional conduct coupled with the increased application of advanced disciplinary measures has introduced an element of fear and increased reporting in schools (see action step 9, this concern area).</li> </ul>	<p style="text-align: center;"><i>"I am reporting things that I don't believe are abuse or neglect because I don't want to be put on admin leave."</i></p> <p style="text-align: right;">– Principal</p>
<p>4. Establish mechanisms for assuring that appropriate contact with students is not exploited for inappropriate purposes.</p>	<ul style="list-style-type: none"> <li>Mechanisms drawn from high-quality references are established</li> <li>Mechanisms communicated widely</li> <li>Mechanisms implemented consistently</li> </ul>
<p>Evidence of Implementation</p>	
<ul style="list-style-type: none"> <li>There is a lack of clarity about what this action step means and how to accomplish it.</li> <li>HPS employees (teachers, coaches, principals, etc.) regularly use multiple platforms to communicate with students and families (email, text, ClassDojo or other on-line platforms). Communications made using district property can be reviewed without notification, but HPS does not have (nor does it expect to establish) mechanisms for regular monitoring of staff communications.</li> <li>OTM has recommended that principals direct school staff to copy school leaders on communications to students and families to make them aware of messages.</li> </ul>	

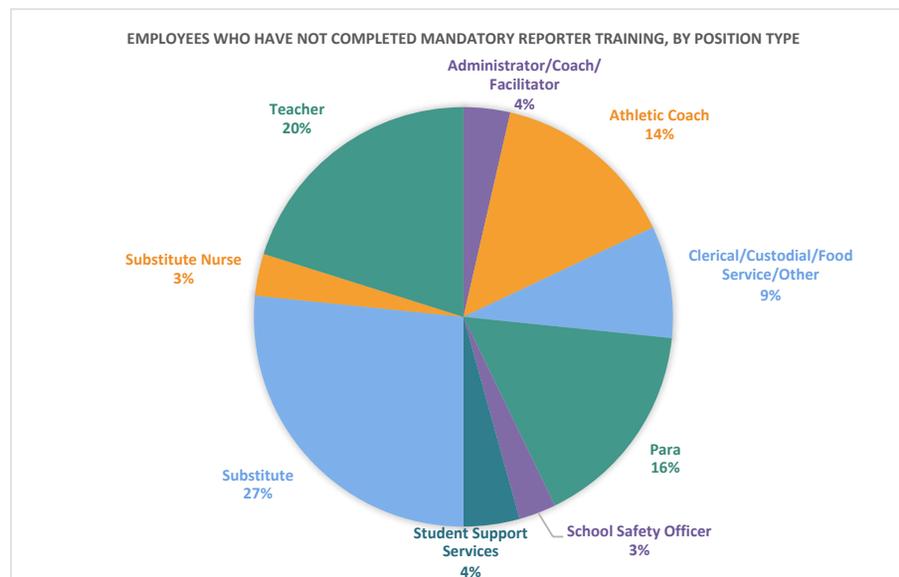
5. Assure compliance with training obligations and refresher course completion for all school employees as provided by Conn. Gen. Stat. Section 17a-101i(f), including refresher course completion at least every three years.

- High-quality training developed
- All school employees participate in training
- Participants perceive training as being informative and helpful



Evidence of Implementation

- According to OTM records, almost all (98%) employees have completed the on-line [mandatory reporter training for school employees developed by DCF](#).<sup>5</sup> The training is in accordance with Sec. 17a-101i(f)(1) of Chapter 319a of the General Statutes of Connecticut and was required by the State before the OCA report. However, there is now more accountability and an explicit expectation that staff members comply with this requirement. The Assistant Superintendent of Talent Management Peter Dart keeps track of this requirement and verifies the district’s compliance in a report to the Connecticut State Department of Education each Fall.
- According to February 2018 data from the district’s Safe Schools platform, 275 HPS staff members have not yet completed mandatory reporting training, with substitute teachers, teachers, and paraeducators, and athletic coaches accounting for 77 percent of all non-completers. OTM reports that of these, many are on long-term medical leave or are not currently working in the system. OTM leaders follow up directly with individuals who have not completed trainings via in-person meetings and through written reprimands. Safe Schools also generates automatic reminders to individual staff who have not completed mandatory training requirements, and to principals who are able to follow-up with school-based staff to encourage their participation.



<sup>5</sup> HPS is not able to rely on its Safe Schools platform for accurate compliance rates. Because it pulls from MUNIS (the city/school district’s human resources data system), the platform flags non-completers who – because they are on leave, are new to the system, have seasonal employment (e.g., coaches) or are not consistently working in schools (e.g., substitutes who are not currently taking assignments) – are not active employees and therefore do not need to be counted in the compliance rates. OTM leaders report having to compare Safe Schools reports to building and district staffing lists to generate up-to-date compliance rates and is working to find a technological solution that will reduce and/or eliminate this manual step in the calculation process.

6. Review and, as necessary, revise training to assure that it is effective and that it incorporates current best practices as recommended in the literature.	<ul style="list-style-type: none"> <li>• Training is evaluated</li> <li>• Training revised based on evaluation results and literature</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• While school employees are fulfilling the mandatory reporter training requirement, many indicated that the on-line training (consisting of a series of videos followed by short assessments) is not very helpful and that the assessments can be passed even without watching the videos. Teachers and principals shared a perception that the on-line training is not helping to improve the overall situation in the district with regard to child abuse and neglect.</li> <li>• OTM leadership has identified a need for more effective professional learning to: <ul style="list-style-type: none"> <li>– Raise awareness of situations of possible child abuse and neglect,</li> <li>– Ensure that all staff understand the process for reporting potential or alleged abuse, and</li> <li>– Delineate between situations of abuse and neglect, professional misconduct, and/or poor professional judgment.</li> </ul> </li> <li>• Accordingly, the Assistant Superintendent of Talent Management Peter Dart created a training program that uses case studies and scenarios to help clarify possible child abuse and neglect situations and the processes for reporting to the Department of Children and Families (DCF) and within HPS schools and central office. School-based staff who have participated in the training describe it as helpful and effective, indicating that it has increased their understanding of specific reporting situations and processes.</li> <li>• Mr. Dart has conducted this training at several monthly principal meetings (in February, March, August, November and December of 2017). Additionally, in-person trainings have been conducted with various support groups (nurses, paraeducators, food service workers, teacher’s union building reps, etc.). According to teachers, some principals (though not all) have repeated the training for staff in their schools. Several principals (17 out of 49) have reportedly requested that Mr. Dart provide the training directly for their school staff. To date, nine schools’ staffs have received the training provided by Mr. Dart.</li> <li>• The district also created the Safe Schools Online Training System (<a href="https://hartford-ct.safeschools.com/training/extra">https://hartford-ct.safeschools.com/training/extra</a>) that provides training modules in various, specific areas of student and school safety including mandatory reporting, restraint and seclusion, identification of child abuse, and many others to support employee understanding of expectations and processes.</li> <li>• Mr. Dart is considering other ways in which professional learning might help to create a shared understanding of what constitutes abuse and neglect, as well as how to build capacity in areas related to student safety (e.g., sharing protocols around ensuring student safety during transition time, creating “look fors” and conducting walkthroughs related to active supervision).</li> </ul>		
7. Provide monthly reminders at faculty meetings or by email.	<ul style="list-style-type: none"> <li>• Reminders provided monthly</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• Several of the monthly school administrator meetings have included training and discussions regarding preventing child abuse and neglect (see previous action step).</li> <li>• HPS’ Safe School platform generates bi-weekly reports for supervisors, including principals, indicating which staff members need to complete initial or refresher child abuse and neglect training.</li> </ul>		

8. Audit and monitor reports quarterly and follow-up with individual schools.	<ul style="list-style-type: none"> <li>• Reports audited and monitored quarterly</li> <li>• Follow ups with schools held as appropriate based on findings</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• Labor Relations Specialists Suhail Aponte and Milly Ramos monitor DCF reports on an on-going basis, participate in DCF investigations in schools, and lead investigations for reports not “picked up” by DCF.</li> <li>• Mr. Dart works with OTM staff to audit reports and follows up with schools regarding disciplinary actions for involved staff. Mr. Dart has also recently begun coding reports and to get a clearer understanding of the types of incidences being reported and related investigation outcomes. This is expected to inform future monitoring, training, and supports to schools.</li> <li>• OTM reports having identified “target schools” based on the frequency and severity of reports. These schools receive more intense follow-up, monitoring, and support.</li> <li>• Superintendent Torres-Rodriguez and DCF leaders have begun to meet quarterly to discuss reporting trends and to identify ways to partner together to address shared challenges.</li> <li>• DCF staff also report meeting with OTM leaders to similarly discuss ways to work together more efficiently to prevent and address issues related to child abuse and neglect in schools. This includes working to identify trends in reports and investigation results (especially program concerns) and ways to partner to solve for them proactively.</li> </ul>		
9. Identify and eliminate organizational impediments to assuring that staff members understand and fulfill their responsibilities as mandated reporters.	<ul style="list-style-type: none"> <li>• Staff members assessed about their responsibilities</li> <li>• Organizational impediments to staff member understanding and implementation identified</li> <li>• Identified impediments addressed</li> <li>• All staff members report understanding and fulfilling responsibilities</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• HPS created an Employee Misconduct Child Abuse/Neglect Incident checklist to help staff members understand their responsibilities and the procedures they must follow as mandated reporters. This includes reporting suspected child abuse or neglect to DCF (by calling the Careline within 12 hours and completing and faxing a DCF-136 form within 48 hours of calling), taking appropriate steps to ensure the student’s safety in the school (contacting parents and guardians, assessing physical harm of student, creating a student safety plan, etc.), and completing internal reporting requirements, including by submitting an unusual incident report in i-Sight (the district’s report tracking system) and notifying appropriate staff within HPS to handle issues related to employee discipline, Title IX, use of seclusion and restraint, etc.</li> <li>• School administrators and teachers report knowing about and using the checklist, which continues to be refined over time. Still, stakeholders shared continued confusion about the district’s internal processes for handling abuse and neglect reports. For example: <ul style="list-style-type: none"> <li>– Mandated reporter training indicates that reporters are not expected to investigate suspected cases of abuse and neglect, but the checklist specifies that employees should (Step 5) “Obtain statements from all parties involved (include student and staff witnesses and alleged wrong-doer). <i>Collect statements separately and make sure they are signed — do not allow for communication regarding the statements among witnesses. Upload to i-Sight. <b>This should be completed on the same day of the incident</b></i>” [Emphasis in original] and (Step 12) “Determine if incident requires <b>further investigations</b>” [Emphasis in original].</li> </ul> </li> </ul>		

- Teachers shared an understanding that reports could be submitted to DCF anonymously, but also an expectation that they also report incidences to their supervisors (the latter being consistent with board policy).
- There is also confusion about who is responsible for making decisions about whether or not “alleged wrong-doers” should be placed on administrative leave. The checklist indicates that paid leave is an automatic response to any report involving “physical or sexual abuse or any other behavior that is seriously disruptive to the educational/work environment or otherwise compromises student or school safety” and that Milly Ramos is the point of contact for instructions related to placing a staff member on leave. OTM staff indicated that employees are automatically put on paid leave if a report involves sexual abuse, but that for other incidences, decisions about leave are made by a combination of Mr. Dart, principal supervisors, Dr. Torres-Rodriguez and, until recently, the district’s former chief of staff.
- School-based staff noted that they feel pressured to report “everything,” leading to increased reporting, increased administrative leave among educators and school staff, increased demand for substitutes (often inadequately trained or without access to information about specific student needs) who fill in for those on leave, increased duties for other school staff while someone is leave, compromised professional reputations, and significant amounts of time spent on DCF and internal reporting and investigation processes, all leading to a negative impact on school culture and reduced capacity to focus on instructional improvement.
- DCF data confirms increased reporting rates. According to those data, school-only reports accepted by DCF increased by 57 percent from school year 2015-16 to school year 2016-17 (from 62 to 92). In the first quarter (September to November) of the 2017-18 school year, DCF received 57 reports, suggesting that this year’s total reports will be higher than last year’s total. In 2016-17, the average investigation time for a report was 54 days; this year, that average is lower (47 days), with investigations resulting in substantiation taking longer than unsubstantiated reports, on average. In 2016-17, 7 percent of report investigations resulted in a substantiation (6 out of 92). So far in 2017-18, that rate is 16 percent (9 out of 57), with approximately 65 percent of unsubstantiated reports resulting in a program concern.
- HPS is now in a position where it must balance a firm and aggressive stance on child abuse, neglect, and harassment with a need to help school staff use professional judgment in making reports versus dealing with inappropriate professional conduct within the school and district. Program concerns issued in unsubstantiated reports can also help the district to identify re-occurring challenges related to professional conduct and/or needs for additional professional learning, alternate staffing patterns, and/or other supports to schools.
- While HPS is trying to mitigate these issues through continued dialogue with school staff and more effective professional development, limited capacity for providing in-person training impedes its ability to do so effectively. DCF staff are also committed to being part of school- and district-level conversations to try to provide clarity about reporting roles and what constitutes abuse or neglect, but increases in reporting levels also stretches DCF staff capacity, limiting their ability to do so.

*“It is, ‘Report or I will report you.’”*  
 – Teacher

*“I no longer have the authority to decide what is an accident or mistake or what is reportable. I no longer want to make that call because I don’t want to be put on admin leave.”*  
 – Principal

*“How do you make a safe environment for students when teachers and principals don’t feel safe?”*  
 – Teacher

*“Everyone is too scared to do anything.”*  
 – Student Police Officer

*“I don’t trust anything unless it comes directly from Peter Dart. We need to clone him to help us all understand what’s reportable and what’s not.”*  
 – Teacher

10. Identify and eliminate cultural impediments to assuring that staff members understand and fulfill their responsibilities as mandated reporters.	<ul style="list-style-type: none"> <li>• Cultural impediments identified through engagement with community</li> <li>• Identified cultural impediments addressed</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• There is a lack of clarity about what this action step means and how to accomplish it.</li> </ul>		

\*Red=not started or off track; Yellow=started and on track; Green=completed

### Concern Area 2 Recommendations

- a) Expand scenario-based training to further delineate and publicize prohibited behaviors between staff and students.
- b) Establish mechanisms for district and school leaders to work together to find ways to balance a firm and aggressive stance on child abuse, neglect, and harassment with a need to help school staff use professional judgment in making reports versus dealing with inappropriate professional conduct within the school and district.
- c) Review data from program concerns and reports not-picked up by DCF on a regular basis to identify re-occurring challenges related to professional conduct and/or needs for additional professional learning, alternate staffing patterns, and/or other supports to schools.
- d) Address stakeholders' confusion about the district's internal processes for handling abuse and neglect reports, possibly by developing flowcharts that help to show how various types of reports should be handled and who is involved in key decisions.
- e) Revisit action step 2.4 to determine what, if any, additional mechanisms are needed. If none, consider removing this step from the action plan. Similarly, clarify or eliminate action step 2.10.

OCA Concern 3 Strand: Professional Development, Policy & Compliance, Human Resources & Labor	FourPoint Rating of HPS Implementation
3. Failure to comply with certain legal obligations and best practices related to child abuse and neglect prevention and reporting.	2

Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

Rubric Rating Rationale

- HPS is able to articulate systems that have been put in place to support students who are involved in suspected abuse or neglect reports or are potentially impacted by sexual abuse or assault, but implementation appears to be incomplete and/or limited in scope.
- HPS has implemented new tracking systems for abuse and neglect reports and is starting to use those systems to better understand the nature of reports and address systemic issues that are contributing to them, including a need for additional training on seclusion and restraint practices.
- The district has taken a more aggressive stance on discipline for staff who are out of compliance with training or mandated reporting duties, or those who have been found to have engaged in abusive or neglectful behaviors.

## Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
1. Provide support to affected students after a staff member is reported for suspected abuse or neglect to assure safety and emotional well-being.	<ul style="list-style-type: none"> <li>• Plan in place for supporting students</li> <li>• Relevant students identified</li> <li>• Relevant students receive appropriate support</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• The Employee Misconduct Child Abuse/Neglect Checklist (see concern area 3, action step 9) includes two specific steps related to providing support to affected students after a staff member is reported for suspected abuse or neglect to assure their safety and emotional well being. These are: <ul style="list-style-type: none"> <li>– Step 2: Assess physical harm of student; send student to the nurse for assessment and documentation</li> <li>– Step 4: Create a safety plan (separating child from adult)</li> </ul> </li> <li>• According to district leaders, a social worker at each school is designated to provide direct support to students and assist in accessing needed community resources to further assure students’ safety and emotional well being.</li> <li>• Further, school crisis teams can be tapped to help create safety plans for students that take into consideration the context, event, alleged perpetrator, school/program, and services available in schools. District records suggest that crisis teams have been fully established in 33 of the district’s 49 schools. The school crisis team is reportedly able to review confidential reports sent to DCF so that they may consider relevant details in creating the student safety plan. Reports that involve students with disabilities are also passed to the district’s Director for Student Support Services, who reviews them with the Executive Director of Special Education to identify additional or further supports for specific students and schools.</li> <li>• While community service providers are available to provide supports to affected students, providers report that they have difficulty accessing schools and providing these supports. Leaders from provider organizations indicated that they are working to inform school staff and parents of their offerings, including by presenting at staff meetings and making marketing collateral (e.g., brochures) available in schools.</li> <li>• The Executive Director of Special Education’s proposal for restructuring the Office of Student Support Services includes a new Program Administrator for Social Services position and a plan for expanding the City Connects methodology, leveraging community resources to address the full needs of HPS students. That proposal is under review.</li> </ul>		
2. Establish a central repository for DCF reports as required by Conn. Gen. Stat. Section 10-220(f).	<ul style="list-style-type: none"> <li>• Repository established consistent with Section 10-220(f)</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• The district has created and implemented i-Sight as the central repository for reports. It also uses the Safe Schools platform to keep track of required training completion rates and to generate summary reports.</li> <li>• Currently, child abuse and neglect reports can also be entered through the HPS Intranet. Primarily used by School Police Officers, the Intranet is not connected to i-Sight. Those using the Intranet site may not realize that they must (or forget to) log the report in both systems. Recognizing this disconnect, the Director of Information Management and OTM staff are working to automatically redirect any reports related to child abuse and neglect started in the Intranet system to</li> </ul>		

i-Sight so that all reports are captured there.		
3. Maintain all guidance from the State Department of Education concerning child abuse and neglect reporting in said central repository.	<ul style="list-style-type: none"> <li>• Guidance maintained in repository</li> <li>• Process in place for any new guidance to be handled properly</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• State Department of Education guidance is maintained in i-Sight.</li> <li>• The Director of Information Management is responsible for updating i-Sight with new guidance as needed and as received from OTM.</li> </ul>		
4. Continue to implement and monitor the sexual abuse and assault awareness program required by Conn. Gen. Stat. Section 17a-101q.	<ul style="list-style-type: none"> <li>• HPS program defined in writing and supervised appropriately</li> <li>• Activities defined by program description are being implemented effectively</li> <li>• Systematic process in place for monitoring performance of program</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• Connecticut General Statute Section 17a-101q requires districts to implement sexual abuse and assault awareness and prevention programs for teachers and students. This law overlaps with Title VI of the Civil Rights Act of 1964 (prohibits discrimination on the basis of race, color, or national origin), Title IX of the Education Amendments of 1972 (prohibits discrimination on the basis of sex), Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act (prohibiting discrimination on the basis of disability), and Erin’s Law, which is Connecticut General Law Sections 14-196 and 17-1012 (requires schools to teach students about healthy relationships and “safe touching”). Sexual abuse is also a specific type of child abuse defined in Connecticut General Statute 46b-120.</li> <li>• As noted in concern area 3, action step 5, almost all (98%) HPS staff have completed the state-required mandated reporter training program, which includes information related to sexual abuse and assault awareness. The Assistant Superintendent for Talent Management monitors this program. The Safe School on-line platform keeps track of the participants and completion information.</li> <li>• Joanne Jackson, Director of Student Support Services, oversees and monitors implementation of Erin’s Law and Title IX. Over the last two years, her office has been implementing various aspects of the laws’ requirements. Title IX requires schools to have a Title IX coordinator and an anti-discrimination policy and grievance process to address sexual discrimination, including sexual harassment. It creates a legal obligation to take steps to prevent and address any harassment that occurs (this includes students harassing other students, which was misunderstood in the district prior to last year). Erin’s Law requires schools to teach students about healthy relationships, “safe touching,” and what to do if students feel uncomfortable or threatened by a child or adult touching them inappropriately. To meet these requirements, the district has: <ul style="list-style-type: none"> <li>– Asked schools to identify a Title IX coordinator who is trained on regulations and responsible for school-based processes and procedures.</li> <li>– Required that Title IX coordinators provide training to all school staff at the beginning of each school year and to students in grades 6-12.</li> <li>– Required schools with websites to post Title IX language to those sites.</li> <li>– Asked schools to develop plans for rolling out age-appropriate curricula for addressing Erin’s Law. In the first year of implementation (2016-17), one grade per “grade band” (1-4, 5-8, and 9-12) was to be taught; schools are to scale up until all grades are taught the curriculum by 2019-20.</li> </ul> </li> </ul>		

<ul style="list-style-type: none"> <li>– Launched a “Tell Someone” campaign (in May 2017), requiring schools to place posters in student-accessible locations with information about what to do/who to contact if they have been hurt or made to feel uncomfortable. These are in addition to posters that schools must post with DCF Careline contact information.</li> <li>• According to district data, 30 of its 49 schools have completed an Erin’s Law plan. At a February 2018 principals’ meeting, district leaders gave an updated deadline for submitting all plans (that month) and met with each principal who did not have a plan in place to make sure they understood the expectation and had support needed to create and submit their plan.</li> <li>• District records also show that 30 schools have provided Title IX presentations to all staff. It is unclear how many schools have active Title IX coordinators or how they have been trained or supported to fulfill their roles.</li> <li>• While the district has only partially implemented Title IX requirements, data are showing that early activities are having an impact. The district has reportedly experienced a significant increase in Title IX reports—from one report in school year 2016-17 to 114 reports between July and November 2017.</li> </ul>		
<p>5. Review compliance with statutory duties regarding restraint and seclusion, including compliance with limitations on use of restraint and seclusion and compliance with record-keeping and parental notification requirements.</p>	<ul style="list-style-type: none"> <li>• Review of policies and procedures conducted</li> <li>• Corrective action outlined by review and implemented in timely manner</li> <li>• Training provided for relevant educators and staff</li> <li>• Record-keeping and parental notification requirements met</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• Public Act 15-141 (the Connecticut statute defining restraint and seclusion requirements and procedures passed in 2015) requires that only staff trained in legally appropriate restraint or seclusion may utilize restraint and seclusion.</li> <li>• If a staff member utilizes restraint or seclusion practices, they are required to complete an incident form in the district’s PowerSchool system. HPS’ eight Directors of Special Education as well as that department’s Executive Director report reviewing new reports on a weekly basis and following required procedures related to parental notifications and submissions of incident reports to the CT State Department of Education.</li> <li>• District administrators recognize a need to improve school-level communications with parents about incidences of seclusion or restraint. Lack of transparency or communications with parents have reportedly been noted in several situations, exacerbating issues.</li> </ul>		
<p>6. Assure compliance with the statutory requirement that all employees receive a copy of the board’s policy on reporting suspected child abuse or neglect each year, as required by Conn. Gen. Stat. Section 17a-101i(e).</p>	<ul style="list-style-type: none"> <li>• Board policy up to date and consistent with statute</li> <li>• All employees have received copy of policy</li> <li>• Employees knowledgeable about policy</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• According to district leaders, the board’s policy on reporting suspected child abuse or neglect is disseminated to all staff at the beginning of each school year via email. The policy is also included in the district’s employee handbook, which is similarly distributed. The policy has also been highlighted in a weekly principal newsletter and discussed with principals during various monthly leadership meetings.</li> </ul>		

7. Assure compliance with the statutory requirement that principals certify annually that staff members in their schools have received training in compliance with statutory requirements and related report by the Superintendent of such certifications to the State Department, as required by Conn. Gen. Stat. Section 17a-101i(f)(3).	<ul style="list-style-type: none"> <li>• School staff trained</li> <li>• Staff believe training to be of high quality</li> <li>• Principals certify staff training</li> <li>• Superintendent reports on principal certifications to State</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• According to Mr. Dart, principals no longer must certify annually that staff members in their schools have completed training; instead, Safe Schools generates a completion report and he verifies compliance as part of a report that is sent to CSDE each Fall.</li> </ul>		
8. Disciplinary action, including termination, for any district employee who fails to comply with these statutory duties.	<ul style="list-style-type: none"> <li>• Staff failing to comply with statutory duties identified</li> <li>• Identified staff disciplined appropriately</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• Most district employees have fulfilled their training obligations; OTM leaders report that they have not had to discipline any staff for not completing the required training. See concern 2, action step 3 for more information about increased use of administrative leave as a consequence of not fulfilling mandated reporter duties.</li> <li>• As noted in that section, the district has also begun to more aggressively pursue termination for staff who have abused, neglected, or harassed students. According to district leaders and external stakeholders, termination is primarily pursued if DCF substantiates a child abuse and neglect report. This is perceived as problematic for several reasons: <ul style="list-style-type: none"> <li>– DCF substantiations can be appealed and overturned. If this happens, it can directly impact the district’s proceedings. DCF leaders have begun requesting a legal opinion on substantiations before they are issued to prevent them from being overturned on appeal.</li> <li>– Some leaders believe that a DCF substantiation should not represent the bar for professional conduct in HPS and should not be the only appropriate basis for a termination decision.</li> </ul> </li> <li>• While HPS leaders are respectful of and sensitive to the rights of employees, they are also committed to ensuring the safety of students and have begun exploring additional disciplinary measures to handle issues related to employee misconduct, including use of extended suspension from duties, appeals to the State Department of Education to revoke licensure, and establishing settlement agreements with employees.</li> <li>• Because these efforts are relatively new (and potentially costly), it will take time to understand how successful the district will be in pursuing more severe disciplinary actions for staff who have egregiously impacted student safety.</li> </ul> <p style="text-align: right;"><i>“We need to get out of the business of DCF deciding what is and isn’t acceptable for us.”</i></p> <p style="text-align: right;">– District administrator</p>		

\*Red=not started or off track; Yellow=started and on track; Green=completed

### Concern Area 3 Recommendations

- a) Establish a crisis team in all schools that do not yet have one. Establish mechanisms for monitoring the effectiveness of these teams and provide additional supports as needed.
- b) Approve and fully implement a strategy for engaging community-service providers to provide supports to students in crisis or needing social-emotional supports.
- c) Fully connect the HPS Intranet and i-Sight to ensure that any reports related to child abuse and neglect started in the Intranet systems are captured in i-Sight.
- d) Ensure that all schools have a high-quality Erin's Law plan, a Title IX coordinator, and have received effective professional learning on Title IX compliance.
- e) Develop and train school administrators on protocols for communicating with families about incidences involving seclusion and restraint.
- f) Continue exploring disciplinary measures to handle issues related to employee misconduct, including use of extended suspension from duties, appeals to the State Department of Education to revoke licensure, and establishment of settlement agreements with employees.

OCA Concern 4 Strands: Human Resources & Labor, Policy & Compliance	FourPoint Rating of HPS Implementation
4. Failure to hold some staff members accountable for inappropriate conduct, whether or not abuse is substantiated.	2

Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

Rubric Rating Rationale

- The district has partially addressed five action steps related to this concern area and fully addressed another two.
- While it hasn't engaged external support to specifically examine organizational structures, HPS has streamlined decision-making processes related to employee discipline and leave related to suspected abuse and neglect reports and is reorganizing/staffing its cabinet to fill vacant positions and ensure leadership capacity for all of its key areas of work, including its student safety priorities.
- The district is also working to communicate standards of acceptable professional conduct and hold to account those failing to meet the standards.
- Finally, the district has enacted several routines to ensure the regular monitoring of suspected abuse, neglect, and harassment reports.

Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
1. Outside review of organizational structure to identify and, where necessary, change structure to assure compliance with child abuse and neglect reporting requirements, including training and appropriate documentation	<ul style="list-style-type: none"> <li>• Outside review of org structure conducted</li> <li>• Change in org structure as recommended by review</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• Over the past year, HPS' organizational structure has changed dramatically as a result of leadership shifts, including new cabinet configurations following</li> </ul>		

Superintendent Torres-Rodriguez' appointment and turnover of staff at the cabinet level. The district's Chief Academic Officer, Chief Financial Officer, Chief of Staff, and Chief of Elementary Education have left their roles over the past six months.

- FourPoint's first monitoring report laid out several recommendations for revisions to HPS' organizational structure to assure compliance with child abuse and neglect reporting requirements, as well as to aid in the prevention and handling of abuse and neglect within the system. These included:
  - Establishing or elevating a leadership role focused on student interventions and supports, including the provision of special education services to students with disabilities.
  - Including a talent management position on the senior leadership team.
  - Consolidating family and community engagement functions into one division led by a senior team member.
  - Including communications leadership on cabinet and assessing where communications should live within the organization.
  - Reconfiguring the ombudsman role.

That report also recommended clarifying roles of leaders and staff across divisions in fulfilling the various steps in the action plan.

- Since the time of that report, a new Deputy Superintendent, Alberto Vasquez Matos, has joined HPS' leadership team, replacing the Chief of Staff in a reconfigured role. Within his first few weeks in this position, Dr. Vasquez Matos worked with divisions to develop formal organizational charts and clarify roles and responsibilities – including those tied to child abuse and neglect reporting and student supports and services.
- The Executive Director of Special Education has developed a proposal – currently under review—for restructuring the Office of Student Supports and Special Education to advance and improve the oversight and implementation of services for students with disabilities.
- The district is currently seeking a new Chief Outreach Officer for Family & Community Engagement and Director of Communications.
- Its ILAT team – a group of leaders and staff charged with action plan implementation – has dissolved, though members are part of a Systemic Continuous Improvement Team (SCIT) that is meeting regularly to discuss the district's key performance indicators, including those related to student safety, and coordinate across offices to move work forward.
- The role of ombudsman has not yet undergone a thorough review. A district's ombudsman plays an important role in facilitating collaborative problem solving and conflict resolution among families, school staff, district staff, and other stakeholders in line with district policies and state law. Another critical function of the ombudsman is to identify trends and/or egregious issues and interface with other district leaders to address them in a systematic manner. HPS' current ombudsman also serves as its Welcome Center Director, responsible both for helping families navigate district systems and negotiate challenges within them. The ombudsman does not appear to be formally connected to other district leaders involved in implementation of this action plan, or have any role in implementing this plan or informing the district's systemic efforts to ensure student safety.

2. Outside review of the district's human resources function and decision-making regarding staff accused of abuse or neglect	<ul style="list-style-type: none"> <li>• Outside review of HR conducted</li> <li>• Change in HR as recommended by review</li> <li>• Outside review of decision-making regarding staff accused of abuse or neglect</li> <li>• Change in decision-making as recommended by review</li> </ul>	
--	--	--

**Evidence of Implementation**

<ul style="list-style-type: none"> <li>• OTM leaders have participated in The Urban Schools Human Capital Academy, a three-year learning community that allows district leaders to assess their own human capital approaches, as well as to work with and learn from experts and other districts. Through the Academy, OTM leaders report that they have developed a more robust talent strategy and identified ways to streamline talent work within and across various departments and roles in the district. While this hasn't specifically focused on the action steps outlined in their OCA plan, OTM noted that they have been able to apply some of the principles of cross-departmental work to hone structures and decision-making regarding staff accused of abuse or neglect.</li> <li>• OTM also reports that over the past year, decision-making regarding staff accused of abuse or neglect has become more streamlined as central office leaders have gained clarity on and experience with disciplinary options, processes, and roles. Still, leaders and staff note that there is still work to do to tease apart which disciplinary actions should be levered, by whom, and in what circumstances (see concern area 2, action steps 3 and 9).</li> </ul>	<p><i>“At first, we had too many people in the decision-making chain. It affected our ability to put someone on leave in a timely fashion. Decision-making used to go up the chain and then back down. We needed to figure out who needed to know versus who needed to act.”</i></p> <p>– District administrator</p>
--	--

3. Review protocols for coordinating internal investigations with DCF and police investigations in accordance with Conn. Gen. Stat. Section 10-221s	<ul style="list-style-type: none"> <li>• Protocols for coordinating investigations in place</li> <li>• Protocols reviewed and report completed</li> <li>• Actions responding to review implemented as appropriate</li> </ul>	
---	--	--

**Evidence of Implementation**

<ul style="list-style-type: none"> <li>• OTM and DCF staff report coordinating closely on internal investigations and partnering with police as appropriate. OTM staff learn about reports in different ways: they are either contacted by a school principal, a district supervisor, or through an entry in the i-Sight system. If DCF picks up the report, they will also contact the Labor Relations Specialists, who are responsible for scheduling interviews with school staff and students, seeking parental approval for student interviews, and gathering any preliminary information from the school. Labor Relations Specialists conduct interviews and investigations with DCF staff. If a principal has not already done so, DCF contacts the police with any report involving sexual abuse of a student or any incidence where the student has experienced significant physical harm. If police are involved, HPS and DCF staff will make use of any reporting or documentation from police reports in an effort to prevent students and staff from having to give multiple accounts.</li> <li>• HPS and DCF leaders are able to discuss issues related to investigation coordination at newly established quarterly meetings and address them appropriately.</li> <li>• One of the charges of school Title IX coordinators is to investigate reports of sexual abuse or harassment. According to DCF staff, these investigations can, at times, overlap with their own. While they have standard protocols for working with HPS' Labor Relations Specialists, there is a need to work to delineate roles and responsibilities between DCF and OTM staff and Title IX coordinators to ensure that investigations are coordinated and do not place undo burden on students and school staff.</li> </ul>
--

4. Retrain administrators, as necessary, on standards of acceptable conduct and the difference between substantiation and acceptable professional conduct	<ul style="list-style-type: none"> <li>• Assessment of administrators requiring retraining conducted</li> <li>• Relevant training provided to identified administrators</li> <li>• Administrators attend and report on training effectiveness</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• The district is working to address this level of training through scenario-based professional learning, though saturation rates are relatively low (see concern area 2, action step 6). Further, the current focus of that training appears to be on helping administrators understand what is and is not a DCF-reportable situation (with the message being to err on the side of reporting). There is not currently a shared understanding among school-based and district staff of what situations might not meet the HPS bar of professional conduct but not warrant a DCF report and some confusion about how to handle both categories of behavior (see concern area 2, action steps 1, 2, and 3). Discussions of standards of acceptable professional conduct have not yet moved beyond the principal's role in handling DCF reports.</li> </ul>		
5. Follow through with disciplinary action for any deviations from reporting and training requirement, including termination, retraining and monitoring	<ul style="list-style-type: none"> <li>• Staff deviating from reporting and training requirements identified</li> <li>• Disciplinary action pursued for identified staff</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• Since the release of the OCA report (February 2017), the district has taken an aggressive stance on employee discipline, including by placing staff who are the focus of DCF reports on administrative leave for the duration of an investigation (see concern area 2, action step 3), placing staff on administrative leave for failing to report incidences to DCF, and pursuing terminations for staff involved in substantiated DCF reports (see concern area 3, action step 8).</li> <li>• Mandatory reporter retraining is required for staff who are found to have not reported an incident. DCF program concern letters can also result in re/training requirements for staff.</li> <li>• Given high training completion rates, the district has not yet enacted any discipline measures for those not meeting mandatory training requirements (see also concern area 2, action step 5).</li> </ul>		
6. Dissemination to all staff members of the Code of Professional Responsibility for Teachers and the Code of Professional Responsibility for Administrators	<ul style="list-style-type: none"> <li>• Code disseminated to all teachers</li> <li>• Code disseminated to all administrators</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• On February 24, 2017, then-acting Superintendent Torres-Rodriguez sent an email to all staff reminding them of their mandatory reporting responsibilities and providing them with copies of the most recent Employee Handbook as well as the Connecticut Codes of Professional Responsibility for Teachers and Administrators.</li> <li>• The Employee Handbook and Codes of Professional Responsibility are also distributed at the start of each school year.</li> </ul>		
7. Weekly review of DCF reports and/or outstanding investigations at OTM meetings (beginning week of 1/3/17)	<ul style="list-style-type: none"> <li>• DCF reports and/or outstanding investigations reviewed weekly at OTM meetings</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• Reports are reviewed on a weekly basis by the OTM.</li> </ul>		

\*Red=not started or off track; Yellow=started and on track; Green=completed

#### Concern Area 4 Recommendations

- a) Continue filling vacant cabinet positions and finalize a central-office organizational structure that ensures compliance with the action plan and implementation of district reforms.
- b) Reconfiguring the ombudsman role, including by creating a specific description of ombudsman duties and articulating linkages between the ombudsman function and district policies and procedures related to child abuse and neglect and harassment within the school community.
- c) Ensure project management of the action plan and clearly define staff responsibilities and reporting relationships for action plan and related reforms.
- d) Delineate roles and responsibilities between DCF, OTM staff, and Title IX coordinators to ensure that investigations are coordinated and do not place undue burden on students and school staff.
- e) Continue to develop scenario-based training on standards of acceptable conduct and the difference between reportable behaviors and acceptable professional conduct and how to handle both; build capacity among high-performing principals and other leaders to expand the reach of this training.

OCA Concern 5	FourPoint Rating of HPS Implementation
Strand: PD, Special Education/Vulnerable Populations, Human Resources & Labor, Policy & Compliance	
5. Special vulnerability of children with disabilities to possible abuse or neglect.	2

Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

Rubric Rating Rationale

- The district has enacted several partnerships to remedy programmatic deficiencies and provide supports to students with disabilities and students with special needs. These partnerships, however, are currently limited in scope. District leaders recognize the need to continue advancing and improving services and programs for students with disabilities and will be proposing further expansion of these partnerships to continue to build and enhance services and programs.
- There is also a recognized need to establish better systems for reviewing and using data from reports involving students with disabilities and/or seclusion and restraint practices to provide targeted supports to schools.
- The district is beginning to better articulate the roles and responsibilities of special education, student supports, culture and climate, and talent management administrators, as well as principal supervisors and the superintendent, in reviewing and using reporting data for decision making about specific staff, students, or schools.

### Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
<p>1. With the advice and assistance of outside experts, identify and remedy programmatic deficiencies that contribute to injuries, including deficient training or inadequate personnel or inadequate supervision.</p>	<ul style="list-style-type: none"> <li>• Outside experts identified and consulted</li> <li>• Programmatic deficiencies identified</li> <li>• Identified programmatic deficiencies addressed</li> <li>• Programmatic deficiencies resolved</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• The district is currently utilizing the services of the Center for Children with Special Needs (CCSN) and DomusKids Inc. for three of its service delivery models (a pre-K/kindergarten program serving students with Autism Spectrum Disorder, STEP – a transition program for 18- to 21-year olds, and the RISE program, which provides intensive supports for students with emotional disturbance). A partnership with DomusKids was started in January 2018 for the RISE program. CCSN supports the early childhood program.</li> <li>• While these partnerships are an excellent start, they are also relatively limited in scope. Additionally, community partners and outside experts expressed concerns that in doing away with a number of special day classes, the district has reduced its continuum of services, potentially bringing it out of compliance with state and federal requirements. Stakeholders also expressed concerns over understaffed and under-resourced special education services.</li> <li>• The district is aware of needed improvements related to state and federal requirements for a continuum of service delivery to meet the needs of students with disabilities in the least restrictive environment. Leaders are in the process of assessing, identifying, and addressing programmatic deficiencies district wide.</li> <li>• The district contracted with District Management Group (DMG) to conduct a review of special education services in 2016. Since that time, HPS hired a new Executive Director of Special Education, who is developing a proposal for restructuring of the Offices of Student Support Services and Special Education. The proposal includes the Executive Director’s recommendations based on:             <ul style="list-style-type: none"> <li>○ Her own assessment of areas for improvement;</li> <li>○ Multiple areas of improvement previously identified in the Connecticut State Department of Education response to identified trends leading to continued non-compliance in the areas of appropriate allocation of entitlement funds under IDEA;</li> <li>○ Multiple areas of improvement directed by the Office of the Child Advocate related to their investigative report regarding district compliance with mandated state and federal laws pertaining to mandated reporting of child abuse and neglect;</li> <li>○ Recommendations from DMG and CCSN in the areas of consistent leadership structure, consistent program structure, multidisciplinary teaming, programming for inclusion, positive behavior support, and continuous improvement planning.</li> </ul> </li> <li>• The recommendations in the proposal target areas for systemic improvement connected to root causes of identified trends in non-compliance that have (1) not yet been implemented, (2) not yet been implemented with precision, and/or (3) been partially implemented but not sustained. The proposal has not yet been rolled out and is currently being reviewed by the Deputy Superintendent.</li> <li>• Experts and community partners also reported uneven implementation of critical support programs such as PBIS and behavior tech trainings. Ensuring that positive behavior support is executed consistently across the district is also addressed in the Office of Student Support Services reorganization proposal, including by positioning the Director of Climate and Culture role within a reorganized Office of Student Support Services. This move is intended to:</li> </ul>		

- Ensure inclusive and equitable experiences for students through a renewed focus on establishing a positive, supportive, safe, and civil climate and culture Hartford Public Schools students, families, and staff; and
- Reinforce the message that establishing norms, values, practices, and policies that work to support positive, equitable, and inclusive organizational cultures is an organizational imperative, and not the exclusive work of one office or division.
- The OCA report included significant concerns regarding the appropriate use, documentation, and procedural and programmatic follow-through related to restraint and seclusion practices in HPS. District leaders recognize the need to expand the number of crisis prevention intervention (CPI) trainers in order to effectively address these concerns. HPS’ Director of Climate and Culture and one Director of Special Education are certified to provide CPI training. Together, they have trained an estimated 220 unduplicated staff. While not all staff are expected to receive initial and follow-on CPI training (to maintain certification, staff must complete the training each year), it is reasonable to assume that at least some subset of special education teachers, social workers, behavior technicians, crisis team members, specialized paraeducators, and other staff ought to participate. Data regarding the number of staff who should versus who are receiving CPI training are not currently available, but some HPS staff characterize the saturation rate as low.
- Special education teachers and support staff reported that increased DCF reporting and use of disciplinary actions such as leave or suspension make them reluctant to use appropriate CPI practices for physical intervention, even if called for in the student’s IEP to reduce self-injurious behaviors (staff have been informed that danger to self or others are the only situations warranting physical intervention with students). Even those with CPI certification indicated that they do not “put hands on [students] or use CPI practices” based on a concern about being reported and placed on leave. Special educators suggested that OTM staff, principals, and other central office and school staff should be made aware of basic, appropriate behavioral interventions, including CPI interventions, so that they are able to distinguish between harmful and appropriate practices.
- Student Police Officers, who are often called on to restrain students, are trained in the Management of Aggressive Behaviors program, which requires recertification every two years. District leaders and staff shared a need for a greater, shared understanding of appropriate practices when physical intervention is called for in a crisis, and more opportunities for training on their application.

<p>2. Work on an ongoing basis with community partners to obtain technical assistance to provide support to children who have experienced trauma and children with special needs.</p>	<ul style="list-style-type: none"> <li>• Appropriate community partners identified</li> <li>• Identified community partners provide TA</li> <li>• Community partners report impactful relationship with district</li> </ul>	
---	---	--

**Evidence of Implementation**

- Community partners (Center for Children with Special Needs, Parents Opening Doors, African Caribbean American Parents of Students with Disabilities, Children’s Advisory Center, Village for Families and Children, and DomusKids) have been engaged and have begun to support schools, students (including those with special needs), and families experiencing trauma and stress. While these partners are in place, concerns remain about the availability of supports across the district, the need for a full continuum of services for students with disabilities, and the sensitivity of some school staff towards students’ cultures and circumstances (i.e., poverty-related challenges they face).
- Community partners reported a shared belief that current HPS leadership has a sincere desire to partner with families and providers. However, concerns were also reported related to implementation of foundational supports for students (including positive behavioral interventions) and the need to develop deeper and more extensive community partnerships among leaders and staff at the school level.

<p>3. Require that the supervising special education administrators review all child abuse reports that involve children with disabilities, identify any failure to comply with child abuse reporting requirements, and take appropriate disciplinary action if such failures are identified.</p>	<ul style="list-style-type: none"> <li>• SPED administrators review reports on a regular basis</li> <li>• As part of review, administrators identify failure to comply with requirements</li> <li>• Administrators take appropriate disciplinary actions</li> <li>• SPED administrators feel empowered to conduct review and take appropriate disciplinary actions</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• Special education administrators and district’s Director of Student Supports (also the Title IX coordinator) review data and reports related to abuse and neglect of HPS students with disabilities as they are received. Additionally, these administrators indicated that they review all reports involving students with disabilities on a monthly basis.</li> <li>• Further, Directors of Special Education work with their supervisor, principal supervisors, and OTM to determine whether and which disciplinary action is appropriate given the circumstances of the report and the result of DCF and the district’s investigation. HPS’ Executive Director of Special Education reports close coordination with OTM regarding disciplinary actions involving student support services or special education staff, especially involving staff returning to assignments in special education programs with highly vulnerable student populations, in order to consider possible reassignment.</li> </ul>		
<p>4. Require that the supervising special education administrators review all reports of restraint and seclusion to assure statutory compliance, to monitor frequency and quality, and to identify any need for further training and/or disciplinary action.</p>	<ul style="list-style-type: none"> <li>• SPED administrators review reports on a regular basis</li> <li>• As part of review, administrators identify need for further training and/or disciplinary action</li> <li>• SPED administrators feel empowered to conduct review, provide training, and take appropriate disciplinary actions</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• Special education administrators review data and reports related to restraint and seclusion of HPS students with disabilities on a weekly basis (see concern area 3, action step 5). Data on seclusion and restraint are entered into Power School; this system can then generate reports that help leaders identify issues related to seclusion and restraint in and across schools.</li> <li>• There is not currently a regular routine for Directors of Special Education and the Director of Culture and Climate (who is also responsible for seclusion and restraint oversight and training) to analyze district-wide seclusion and restraint data trends to inform training, staffing, or other supports.</li> <li>• When appropriate, Directors of Special Education work with supervisors and OTM to determine disciplinary action for staff who have or are suspected to have inappropriately applied seclusion and restraint practices. If staff are placed on leave during a DCF investigation, these positions are staffed with a substitute teacher or left unfilled, reportedly making IEP implementation and classroom management challenging.</li> <li>• Directors of Special Education do not appear empowered to take appropriate disciplinary actions themselves (i.e., directing individuals to training, discussing inappropriate language or behavior with staff, or engaging with OTM in regular conversations about these issues). This may be in part due to a lack of an official supervisory structure related to special education programs located on school campuses (i.e., clear delineation between leadership responsibilities of principals, principal supervisors, and Directors of Special Education in regards to special education programming and staff). A formal supervisory structure is currently being defined.</li> </ul>		

<p>5. Superintendent review, including legal counsel, on a quarterly basis of all such reports, as well as of any program concern letters from DCF, to identify possible systemic problems and to take appropriate remedial action.</p>	<ul style="list-style-type: none"> <li>• Superintendent reviews SPED administrators work on quarterly basis and identifies systemic problems as appropriate</li> <li>• Superintendent takes appropriate remedial action as appropriate</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• DCF reports and investigation results are sent directly to the Superintendent, who shares them with OTM, legal counsel, and other leaders, as appropriate, to address related employee or programmatic issues.</li> <li>• As noted in concern area 2, action step 8, HPS and DCF leaders have established a quarterly meeting routine to discuss reports, investigations, and their results, as well as joint challenges and solutions.</li> <li>• OTM staff are currently working to code substantiated reports, program concern letters, and reports not “picked up” by DCF to be able to better identify trends and systemic issues.</li> <li>• While HPS leaders are in regular communication about reports of and activities related to preventing and addressing abuse, neglect, and harassment by employees, there is not currently a formal, quarterly meeting at which the Superintendent, legal counsel, and leaders from district divisions (e.g., talent management and special education) discuss reporting trends, identify systemic issues, and establish remedial steps.</li> </ul>		
<p>6. To assure transparency, review all such reports and program concern letters on a semi-annual basis with outside agency (e.g., the Office of the Child Advocate, the State Department of Education, the Department of Children and Families, the Office of Protection and Advocacy for Disabled Persons [being phased out]).</p>	<ul style="list-style-type: none"> <li>• Outside agency reviews reports on semi-annual basis</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• As noted above and elsewhere in this report, reports are regularly reviewed with DCF as part of a quarterly meeting series.</li> </ul>		
<p>7. Require that reports concerning suspected abuse or neglect of students aged 18 through 21 be made (1) to DCF, (2) internally in accordance with the new procedure described below, (3) to the Office of Protection and Advocacy (or successor agency), and (4) where appropriate, law enforcement.</p>	<ul style="list-style-type: none"> <li>• Reports made as appropriate</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• It appears that very few eligible students aged 18-21 are receiving special education services as required by federal law. Currently, only 20 students participate in HPS’ 18 to 21 year-old programming, five of whom are age 21 (districts of comparable size and demographics serve between 50-75 students within the 18 to 21 age range). Many of these are part of the STEP program, operated in partnership with the CCSN and primarily serving students with an intellectual disability or those who are non-verbal with autism. An assistant principal at the high school and special education staff—including speech-language pathologists, an occupational therapist and physical therapist, behavior technicians, and paraprofessionals—support the district’s transition programming.</li> <li>• According to HPS’ Executive Director of Special Education, Director of Student Support Services, and the Director of Special Education assigned to the high school, two reports have been made to DCF related to students’ aged 18-20, none for students aged 21. Like any other abuse or neglect report, those made</li> </ul>		

related to students aged 18 to 21 are also reported through i-Sight, which initiates an OTM investigation and any relevant disciplinary proceedings. Leaders from HPS' special education division further shared that the Department of Developmental Services' Office of Protection and Advocacy also receives reports as part of the district's documentation process. That office, however, was abolished in June 2017, and is now replaced by Disability Rights Connecticut, a nonprofit organization with a mission to "advocate, educate, investigate, and pursue legal, administrative, and other appropriate remedies to advance and protect the civil rights of individuals with disabilities to participate equally and fully in all facets of community life in Connecticut."

- District leaders acknowledge that addressing reports related to abuse or neglect of students aged 18 to 21 is a continued challenge, particularly since DCF will not investigate any reports involving a student above the age of 17. See concern area 6 action step 2 for more information on how HPS is working to address this issue through board policy.

\*Red=not started or off track; Yellow=started and on track; Green=completed

#### Concern Area 5 Recommendations

- a) Refine the proposed special education restructuring plan as needed and make full implementation of a high-quality continuum of services for students with disabilities a district priority. Use results from IEP sample reviews to drive high-quality IEP development and service provision.
- b) Ensure that staff are well trained on implementation of critical academic and behavioral interventions and monitor and support implementation.
- c) Ensure that all behavior techs have the capacity to support teachers and students effectively.
- d) Reduce and improve the use of Crisis Prevention Intervention (CPI) techniques, including verbal de-escalation and physical intervention with appropriately trained crisis team staff through a major expansion in the capacity to provide CPI training. Set annual targets for which staff should be trained on seclusion and restraint practices, build staff capacity for training, and track progress against the established targets.
- e) Finalize a supervisory structure for special education programs on school campuses and empower SPED administrators to work with OTM to conduct programmatic reviews and, as appropriate, discipline staff regardless of whether DCF is involved.
- f) Establish an ongoing meeting at which the Superintendent, legal counsel, and leaders from district divisions (e.g., talent management and special education) review reporting, investigation outcome, and employee discipline data, identify trends and systemic issues, and establish remedial steps.
- g) Finalize, implement, and monitor a plan for identifying and serving students aged 18-21 eligible for special education services as required by federal law.

OCA Concern 6 Strands: Policy & Compliance	FourPoint Rating of HPS Implementation
6. Failure to comply with legal obligation to update and disseminate board policy on reporting suspected child abuse and neglect.	2

Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

Rubric Rating Rationale

- The district has addressed nearly all of the action steps related to this concern area. Once the board updates its policies to address reporting procedures for incidences involving students aged 18 to 21 (currently underway), FourPoint would consider implementation for this concern area to be a 3 on the rubric.

Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
1. The board policy committee will review current policy on reporting suspected child abuse and neglect with legal counsel to assure statutory compliance.	<ul style="list-style-type: none"> <li>Board committee reviews policy with legal counsel</li> <li>Board committee proposes changes to full board as appropriate</li> <li>Full board takes action as appropriate</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>The board updated the district’s policy on child abuse and neglect on June 21, 2016, approximately two months after the 2016 Genao incident that initiated OCA’s investigation and report. The policy was originally adopted in 1999. The board relied on legal counsel from Shipman &amp; Goodwin to ensure that the updated policy is congruent with CT statutory requirements.</li> </ul>		

<ul style="list-style-type: none"> <li>Major changes in the update included expanding the list of employees who are obligated mandatory reporters (all district employees are now included); outlining reporting and investigation procedures; including training and record-keeping requirements; and including statutory and operational definitions of child abuse and neglect and sexual assault.</li> </ul>		
<p>2. The board policy committee will augment the current policy on reporting suspected child abuse and neglect to add reporting requirements concerning suspected abuse of students aged 18 through 21.</p>	<ul style="list-style-type: none"> <li>Board committee proposes augmentation to policy to full board</li> <li>Full board takes action as appropriate</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>Language in current board policy states: “(1) that any child under eighteen has been abused or neglected, has had a nonaccidental physical injury, or injury which is at variance with the history given of such injury, or has been placed at imminent risk of serious harm, or (2) that any person who is being educated by the technical high school system or a local or regional board of education, other than as part of an adult education program, is a victim of sexual assault, and the perpetrator is a school employee, to report such suspicions to the appropriate authority.”</li> <li>The policy committee is currently working to update this policy to add reporting requirements concerning suspected (non-sexual) abuse of students aged 18-21. This is primarily focused on those students who are eligible for transition or other special education services as part of their Individualized Education Program. HPS has invited OCA to participate in a March 13, 2018 board policy committee meeting focused on this update. Representatives from Corporation Counsel, the city’s legal team that also supports HPS, will also be on hand to provide recommendations.</li> </ul>		
<p>3. In consultation with the superintendent, the board will establish a procedure for annually monitoring legislative changes and promptly updating board policies to conform to such legislative changes.</p>	<ul style="list-style-type: none"> <li>Board consults with superintendent regarding procedure</li> <li>Board establishes procedure</li> <li>Board implements procedure as relevant</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>In its report, the OCA flagged that the district’s policy on reporting suspected child abuse and neglect was out of date and did not conform to statutory changes that had been made since 1999. According to district leaders and board members, this was true not only for this policy, but many of the board’s policies. No system was in place for monitoring legislative changes that might impact policies or identifying policies that were due for review and updating. To address these issues, the board has: <ul style="list-style-type: none"> <li>Audited its policies to identify those that should be revisited and/or revised.</li> <li>Subscribed to a “model policy” service from Shipman &amp; Goodwin that provides the district with samples of common policies and updates/alerts when there are legislative changes impacting those policies.</li> <li>Worked to address the backlog of policies that require review or revision, including by revising and adopting the model policies provided by Shipman &amp; Goodwin, ensuring that they are tailored to Hartford Public Schools’ unique context and reflect community input and priorities.</li> <li>Considered ways to expedite the policy revision process, including by engaging other board committees to review and suggest updates to policies that fall under their purview (e.g., the Family and Community Engagement committee would review and suggest revisions to related policies). This would help to distribute responsibilities for updates, allow committee members to become more familiar with policies that affect their specific areas, and allow the board</li> </ul> </li> </ul>		

<p>to address its backlog in a more expedient manner.</p> <ul style="list-style-type: none"> <li>- Has purchased a new BoardDocs system, which will allow the district to better catalogue, track, and update policies. BoardDocs is expected to be implemented beginning in late-March 2018.</li> </ul>		
<p>4. In its oversight role, the board will monitor compliance with statutory duty to distribute annually the board policy on reporting suspected child abuse and neglect to all employees, as required by Conn. Gen. Stat. Section 17a-101i(e).</p>	<ul style="list-style-type: none"> <li>• Board policy distributed to all employees</li> <li>• Board assures distribution</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• See concern area 3, action step 6. This activity is carried out by HPS' board liaison.</li> </ul>		
<p>5. In its oversight role, the board will monitor compliance with the requirement that all employees have completed the training and refresher training programs, as required by Conn. Gen. Stat. Section 17a-101(c).</p>	<ul style="list-style-type: none"> <li>• Board receives regular updates about employee training, including attendance and quality indicator</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• While Dr. Torres-Rodriguez has provided updates to the board on the status of the district's student safety action plan (see concern area 9, action step 5), board members do not recall (and no formal reports show) being presented with or seeking information related to mandatory training and refresher training completion rates.</li> <li>• Board members have confidence that the superintendent will improve the district's prevention and response to child abuse, neglect, and harassment and report not having been engaged in implementation of the plan beyond the action steps that fall directly in their purview (i.e., reviewing, adjusting, disseminating, and monitoring board policies).</li> </ul>		
<p>6. The superintendent will inventory activities of the Central Harassment Prevention Team and report to the board policy committee on a quarterly basis to assist the board in fulfilling its oversight role.</p>	<ul style="list-style-type: none"> <li>• Superintendent conducts inventory</li> <li>• Superintendent reports to board policy committee on quarterly basis</li> </ul>	
<p><b>Evidence of Implementation</b></p>		
<ul style="list-style-type: none"> <li>• The Central Harassment Prevention Team meets regularly and is fully functional.</li> <li>• The superintendent has conducted an inventory of the activities of the Central Harassment Prevention Team.</li> <li>• The Central Team reports to the board and superintendent regularly at board policy committee meetings.</li> </ul>		

\*Red=not started or off track; Yellow=started and on track; Green=completed

#### Concern Area 6 Recommendations

- a) Ensure that board policy is completely up to date and in statutory compliance with regard to reporting suspected child abuse and neglect, including for those students aged 18 through 21.

- b) Continue to assess and revise policies that are outdated or inconsistent with statutory requirements.
- c) Ensure that the board monitors compliance with its statutory duty to confirm that all employees have completed training and refresher training programs.

OCA Concern 7 Strand: PD, Policy & Compliance	FourPoint Rating of HPS Implementation
7. Inadequate understanding and potential non-compliance with Title IX obligations by teachers and administrators.	2

#### Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

#### Rubric Rating Rationale

- While HPS has a re-energized Central Harassment and Prevention team, there is still a need to increase oversight of school-based Title IX resources and supports, and to ensure that reporting and grievance procedures for harassment complaints are universally understood.

#### Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
1. Train administrators on Title IX obligations, as necessary, including retention of outside experts to provide high-level training.	<ul style="list-style-type: none"> <li>Training designed and planned</li> <li>Outside experts retained to support training</li> <li>Administrators receive training</li> <li>Administrators report training to be effective</li> </ul>	Yellow
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>As noted in concern area 3, action step 6, twenty-three schools have administered Title IX presentations to all staff. It is unclear how many schools have active Title IX coordinators or how they have been trained or supported to fulfill their roles.</li> <li>While the district has only partially implemented Title IX requirements, data are showing that early activities are having an impact. The district has experienced a significant increase in Title IX reports—from one report in school year 2016-17 to 114 reports between July and November 2017.</li> </ul>		
2. Charge the Central Harassment Prevention Team with responsibility for reviewing all school-based harassment investigation reports to identify systemic problems and recommend solutions.	<ul style="list-style-type: none"> <li>Team given description of responsibilities</li> <li>Team reviews reports, identifying problems and recommendation as relevant</li> <li>Recommendations acted upon as appropriate</li> </ul>	Green
<b>Evidence of Implementation</b>		

- The Central Harassment Prevention Team is appointed by the superintendent and is responsible for addressing reports of harassment within the district. This includes reports involving student-student, student-staff, or staff-staff interactions. Central Team members report that the vast majority of reports received involve staff-staff interactions. According to HPS policy, the team must consist of at least the Director of Human Resources and his or her designee, the Assistant Superintendent for Support Services and his or her designee, a Title IX Coordinator, and at least one school principal. The team currently meets these requirements.
- HPS harassment policy (R-4118.3(b)/4218.3) requires non school-based staff to report potential harassment violations directly to the Central Harassment Prevention Team. The policy also requires school-based staff and students to report potential violations to the School Site Harassment Prevention Team, which will “immediately notify the Central Team” of the harassment allegations. According to HPS policy 4118.3(a)/4218.3, the Central Harassment Prevention Team is responsible for making recommendations to the appropriate school principal for remedial action in the case of student violators, or to the superintendent in the case of staff and other non-student violators. The Central Team is also responsible for making suggestions and recommendations regarding policy implementation at each school site as needed.
- Members of the Central Harassment Prevention Team reported that it receives all harassment complaints, including alleged sexual and discriminatory incidences. However, HPS policy related to sexual harassment, 4118.31(a)/4218.31 (last updated in 2005), does not require sexual harassment claims to be reported to the Central Harassment Prevention Team. The policy states that any infraction of HPS’s sexual harassment policy “by supervisors or co-workers should be reported immediately to the Superintendent or his/her designee.” The policy continues, “Any employee who believes that he or she has been [sexually] harassed in the workplace in violation of this policy may also file a complaint with the Connecticut Commission on Human Rights and Opportunities.”
- This action step was included to address the OCA’s finding that the Central Harassment Prevention Team was unable to produce detailed records of internal harassment complaints regarding staff or students for the three years prior to 2017: “Though HPS policy created a Central Harassment Prevention Team to address all complaints involving staff and students, no internal complaints were produced. After reviewing a draft of this Report, HPS produced a newly created document listing five complaints from the last three (3) school years but providing few details.” In response to the OCA report, the Central Harassment Prevention Team took on three additional responsibilities this academic year (2017-18):
  - Participating in policy discussions at the board of education committee meetings.
  - Monitoring data (total number of cases and total number of substantiated harassments).
  - Meeting more frequently (monthly or as needed, compared to bi-annually).
- The Central Harassment Prevention Team reported several challenges related to its role in upholding HPS harassment policies:
  - Team members explained that student/student harassment should “live at the school building,” under the responsibility of each school’s School Site Harassment Prevention Team. However, there is a lack of clarity about where to report student/student harassment complaints because HPS policy states that “Reports made by staff or students relating to student/student harassment may be made to any Team as appropriate.”
  - There is a lack of clarity regarding what is considered harassment under HPS policy. According to team members, “99.9 percent of the time [the Central Harassment Prevention Team] doesn’t find harassment because the policy is pretty tight as to what harassment is. It is a Title IV civil rights, anti-discrimination policy.” HPS policy 4118.3(a)/4218.3 defines harassment as: “Unwelcome discriminatory behavior toward an individual or individuals on the basis of race, ancestry, color, religious creed, national origin, age, sex, sexual orientation, gender identity or expression, disability, marital status, present or

<p>past history of mental disorder, mental retardation, learning disability or physical disability, or abilities unrelated to performance.”</p> <ul style="list-style-type: none"> <li>– Team members indicated that it is inappropriate for them to make determinations about incidences involving high-level district leaders and recommended that any such incident be considered instead by the City of Hartford’s ethics committee.</li> <li>– Finally, the team reported that there is not currently an appeals process for adults reporting harassment. There is, however, an appeals process for students.</li> </ul>		
3. Establish a schedule for required reports from the Central Harassment Prevention Team to the superintendent and the board of education.	<ul style="list-style-type: none"> <li>• Schedule established</li> <li>• Reports made to superintendent and board per schedule</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• On March 31, 2017 the Board of Education policy committee requested an update on all activities of the Central Harassment Prevention Team for the past 12 months. The chair also requested that the update be presented to the policy committee during the May 2017 meeting and quarterly thereafter, in accordance with the OCA Action Plan.</li> <li>• The Central Harassment Prevention Team reported that it has been meeting with the board’s policy committee monthly to provide updates on its activities.</li> </ul>		
4. Assure that non-discrimination policies are widely disseminated.	<ul style="list-style-type: none"> <li>• Policies widely disseminated</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• HPS’ non-discrimination policies are posted on their website (<a href="https://www.hartfordschools.org/non-discrimination-policy/">https://www.hartfordschools.org/non-discrimination-policy/</a>).</li> <li>• In addition to the Tell Someone campaign posters, the district has developed posters that include sexual harassment definitions and provide examples of sexual harassment, which are available in English and Spanish. The extent to which these posters have been distributed and posted in schools is not clear.</li> <li>• In October 2017, schools were asked to include Title IX information on their school-based websites. Of the 50 schools listed on the HPS school directory, 14 have included Title IX information on their websites and an additional four schools included a link to the student handbook, which discusses Title IX information. As of March 2018, 14 schools have not included Title IX information on their website and 18 schools do not have a website.</li> </ul>		
5. Review and revision of board policies and administrative documents, including staff and student handbooks to assure legal compliance and consistency in defining harassment and establishing grievance/complaint procedures.	<ul style="list-style-type: none"> <li>• Board policies and administrative documents reviewed</li> <li>• Changes to policies and administrative documents made based on review as appropriate</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• It is not clear whether board policies and administrative documents were reviewed to assure legal compliance and consistency in defining harassment and establishing complaint procedures.</li> <li>• The HPS Employee Handbook (last updated in January 2017) provides contact information for District Title IX Coordinators and definitions of harassment and sexual harassment. These definitions are consistent with HPS harassment policies (4118.3(a)/4218.3 and 4118.3(b)/4218.3) and the HPS sexual harassment policy (4118.31(a)/4218.31).</li> <li>• Consistent with the HPS sexual harassment policy, the Employee Handbook directs individuals to report sexual harassment to the superintendent or to the</li> </ul>		

<p>Connecticut Commission on Human Rights and Opportunities.</p> <ul style="list-style-type: none"> <li>• Also consistent with HPS harassment policies, the HPS Employee Handbook directs school staff to report harassment to the School Site Harassment Prevention Team and non-school staff to report directly to the Central Harassment Prevention Team. The Employee Handbook, like HPS policy 4118.3(b)/4218.3, is ambiguous about student/student harassment: “Reports made by staff or students relating to student/student harassment may be made to any Team as appropriate.”</li> <li>• Many schools have their own student/parent handbook or do not post their handbooks online. It is not clear whether these handbooks have been reviewed to ensure consistency in defining harassment and establishing grievance or complaint procedures.</li> </ul>		
6. Include training of teachers on Title IX obligations in the Hartford Public Schools professional development plan.	• Training of teachers on Title IX obligations added to PD plan	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>• HPS’ 2017-18 professional learning plan indicates that Title IX training should be provided to “all certified employees” in August and administered by Title IX site-based coordinators.</li> <li>• As reported in concern area 3, action step 4, district data show that twenty-three schools have provided Title IX presentations to all staff. It is unclear how many schools have active Title IX coordinators or how they have been trained or supported to fulfill their roles.</li> </ul>		

\*Red=not started or off track; Yellow=started and on track; Green=completed

### Concern Area 7 Recommendations

- a) Ensure that board policies and administrative documents (including staff and student handbooks) related to child abuse and neglect reporting for students aged 18-21 and Title IX obligations have been reviewed, revised, and widely disseminated.

OCA Concern 8 Strands: Policy & Compliance	FourPoint Rating of HPS Implementation
8. HPS may currently lack the internal capacity to implement and monitor this action plan.	3

#### Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has implemented action steps in a way that moves beyond compliance and has changed district culture	HPS regularly assesses the impact of its strategies and makes additional and appropriate adjustments to policies, systems, and structures to sustain strong implementation and continuous improvement

#### Rubric Rating Rationale

- HPS has secured an independent monitor for its action plan implementation and, in partnership with FourPoint, has established a methodology for assessing implementation.
- The district has yet to create an implementation plan to move this work forward and will also need to develop a way to assess the function and effectiveness of its monitor.

#### Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
1. Reach out to appropriate state and federal agencies (State Dep of Ed, Dep of Children and Families, OCA, Office of Protection and Advocacy for Persons with Disabilities, OCR of USED) for technical assistance and monitoring	<ul style="list-style-type: none"> <li>• Appropriate agencies contacted</li> <li>• Agencies provide TA and monitoring as appropriate</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>• The district is working with the Department of Children and Families and the Office of the Child Advocate to receive technical assistance and help implementing the action plan. Superintendent Torres-Rodriguez and DCF's Regional Director, Christine Lau, have enacted a series of quarterly meetings to identify and address shared challenges and improve partnership between these two agencies. Both describe these meetings as extremely useful and productive.</li> <li>• The district has also created a Monitoring Advisory Group (MAG) of community partners and agencies that will monitor implementation of the action plan and</li> </ul>		

<p>progress on the prevention of child abuse, neglect, and harassment in the system. The first meeting of the MAG was on January 25, 2018; its second will take place March 8, 2018.</p> <ul style="list-style-type: none"> <li>The Department of Children and Families has been an integral part of the implementation. There is some concern from several quarters in the district that DCF is overwhelmed by the number of reports they are receiving and that the agency does not have sufficient bandwidth to help provide technical assistance to the district. DCF leaders and staff have been part of trainings and discussions with school administrators and are working with OTM to provide targeted supports to schools, based on trends in reporting and investigation outcomes.</li> </ul>		
<p>2. Confer with outside experts including the Office of the Child Advocate to establish a framework and expectations for an independent monitor (or monitors), including a process for establishing criteria and benchmarks for measuring successful implementation of this action plan</p>	<ul style="list-style-type: none"> <li>Outside experts contacted</li> <li>Process established for measuring implementation of action plan</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>FourPoint has been hired to monitor the implementation of this action plan. Its initial monitoring report included district-approved criteria and benchmarks for measuring the successful implementation of this plan.</li> <li>While the district developed an action plan, it did not develop a cohesive implementation plan. FourPoint has provided a template and sample implementation plan. HPS should create an implementation plan as soon as possible.</li> <li>HPS is in the process of developing key performance metrics that will define the success of action plan implementation. These metrics will be part of the Key Performance Indicators that the district is developing for all of its priorities and used by the MAG to monitor the effectiveness of the plan over the long term.</li> </ul>		
<p>3. Appoint an independent monitor(s) in accordance with such framework and expectations to oversee progress in implementing this action plan, who will provide periodic public progress reports to the board of education, the State Department of Education and the Department of Children and Families</p>	<ul style="list-style-type: none"> <li>Independent monitor appointed</li> <li>Monitor oversees progress in implementing action plan</li> <li>Monitor provides progress reports</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>The district has appointed FourPoint as the independent monitor of this action plan. In this role, FourPoint is compiling information and developing three reports that describe the district's progress toward accomplishing the specific actions outlined in the plan and the degree to which the work of the district is successful as defined by the performance metrics and rubrics included in the monitoring framework.</li> <li>FourPoint's first report to the district, board of education, and relevant agencies was delivered in December 2017. Its second report will be submitted in April 2018. A third and final report is expected June 2018.</li> </ul>		
<p>4. Assess function and effectiveness of monitor(s) after one year</p>	<ul style="list-style-type: none"> <li>Effectiveness of monitor assessed</li> </ul>	N/A
Evidence of Implementation		
<ul style="list-style-type: none"> <li>This step is not applicable as the monitor has not been working for one year, but the district should prepare to evaluate FourPoint.</li> </ul>		

\*Red=not started or off track; Yellow=started and on track; Green=completed

## Concern Area 8 Recommendations

- a) Develop an implementation plan based on the action plan that streamlines action steps, establishes priorities, and assigns responsibilities and timelines; consider relying on FourPoint for assistance in creating the implementation plan.
- b) Assign a senior level district administrator responsibility for facilitating development of the implementation plan, assigning staff responsibilities and resources, monitoring implementation, and making adjustments as necessary.
- c) Continue to convene the Monitoring Advisory Group regularly.
- d) In collaboration with the Monitoring Advisory Group, finalize key performance metrics for assessing the impact of the action plan and implementation plan.
- e) Track and publicly report progress of improving student safety, well being, and readiness to learn against the key performance metrics as well as indicators of implementation.

OCA Concern 9 Strands: Family & Community Engagement	FourPoint Rating of HPS Implementation
9. HPS must prioritize family engagement and community partnerships to assure transparency and accountability.	2

Rubric for Rating of HPS Implementation

1	2	3	4	5
Few or no action steps are fully implemented and/or significant questions remain about quality of implementation	Most action steps are fully implemented at acceptable levels of quality, or all action steps are implemented but questions remain about quality	All action steps are fully implemented, and stakeholders agree that implementation was high quality with few exceptions	HPS has revised policies, systems, and structures to be aligned to a clear strategy and goal tied to family engagement and community partnerships	HPS regularly assesses the impact of its strategy and makes appropriate adjustments to policies, systems, and structures.

Rubric Rating Rationale

- The district was effective in communicating with families and stakeholders immediately following the release of the OCA report and related action plan. Since that time, however, communications have diminished significantly. Further, there’s a need for the district to establish protocols for following up with families whose children are involved in suspected abuse or neglect reports and investigations.

Evidence Informing the Rubric Rating

Action Step	Indicators of Implementation	Assessed Status (Red, Yellow, Green)*
1. The superintendent will distribute a letter to all families regarding the report and the draft action plan providing information about how to access more information and share concerns through a special information resource line and email (Note: if callers are reporting suspected child abuse or neglect or sexual assault, they will be directed to the DCF Care Line).	<ul style="list-style-type: none"> <li>Superintendent distributes letter</li> <li>Information posted in easily accessible fashion</li> <li>Information accessed by stakeholders</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>Then-acting Superintendent Torres-Rodriguez issued a letter to all families and community partners on February 10, 2017 providing a summary of the OCA report findings, announcing that a related action plan had been developed and would be presented to the Board of Education for adoption at its next meeting, and providing contact information for any questions or concerns related to the report or plan. The letter also included instructions for reporting a case of</li> </ul>		

<p>suspected child abuse and neglect and the phone number for the CareLine.</p> <ul style="list-style-type: none"> <li>In early 2017, HPS established a dedicated page on its website that includes resources and updates related to student safety (<a href="https://www.hartfordschools.org/studentsafety/">https://www.hartfordschools.org/studentsafety/</a>), including: <ul style="list-style-type: none"> <li>Emergency behavior/mental health counseling and services</li> <li>Contact information for specialists who can connect families/students with public services</li> <li>Sexual abuse services</li> <li>DCF’s Careline</li> <li>Legal Aid</li> <li>The OCA Report, action plan, action plan updates (Feb-May 2017), and FourPoint monitoring reports</li> <li>Presentations from related community forums</li> <li>Information about how to report suspected child abuse or neglect</li> </ul> </li> </ul>		
<p>2. The superintendent will direct principals to convene emergency staff meetings to discuss and develop plans to support students and families and ensure every student is and feels safe.</p>	<ul style="list-style-type: none"> <li>Superintendent directs principals</li> <li>Principals convene emergency meetings</li> <li>School plans are developed</li> <li>Plans are high quality</li> <li>Plans are implemented</li> </ul>	
<p><b>Evidence of Implementation</b></p> <ul style="list-style-type: none"> <li>Following the release of the OCA report and related action plan in February 2017, HPS held an emergency administrative meeting with central office and school leaders. In this meeting, district leaders outlined detailed plans for all schools/principals to meet with staff and share OCA’s report, HPS’ action plan, and related follow-up.</li> <li>According to district staff, central office administrators monitored schools to ensure that principals conducted meetings with their staff. Presentations were to include plans for communicating with students and families about the OCA report and district’s response. Principals were provided with a letter template as well as documents from the superintendent that could be shared with families.</li> <li>See concern area 3, action step 1 for additional information about student safety plans and school crisis teams, which have been implemented to ensure student safety on a case-by-case basis.</li> </ul>		
<p>3. The superintendent will bring this draft action plan to the board of education for input, adoption and endorsement at its next meeting.</p>	<ul style="list-style-type: none"> <li>Superintendent proposed action plan to board</li> <li>Board adopted and endorsed action plan</li> </ul>	
<p><b>Evidence of Implementation</b></p> <ul style="list-style-type: none"> <li>Superintendent Torres-Rodriguez presented this draft action plan to the board of education for input, adoption, and endorsement on February 21, 2017.</li> <li>The board unanimously voted to adopt the plan (with one member absent), noting the importance of changing culture in the district and the need for all district staff and stakeholders to work together to ensure that students are safe in their schools and communities.</li> </ul>		
<p>4. The board and superintendent will promptly schedule a number of community forums to hear parent and community concerns regarding the report and related issues.</p>	<ul style="list-style-type: none"> <li>Board and superintendent scheduled community forums</li> <li>Community forums held</li> </ul>	

	<ul style="list-style-type: none"> <li>Participating community members indicate forums were useful</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>On February 14, 2017, HPS convened a group of district partners and leaders to plan for community forums.</li> <li>HPS then convened four community forums, two involving a presentation from OCA and Superintendent Torres-Rodriguez on the OCA report and resulting action plan (March 23, 2017 at Milner School and April 6, 2017 at Journalism and Media Academy) and two dedicated to “community conversations about preventing child abuse and neglect, recognizing the signs, reporting and getting help” (March 30, 2017 at Bulkeley High School and April 20, 2017 at Hartford Public High School). DCF leaders also attended each forum. Food, child care, and transportation were available for each meeting.</li> <li>Approximately 130 people participated in these forums (Milner – 43, BHS – 28, JMA- 34, and HPHS – 25). No data were collected regarding their utility.</li> </ul>		
5. The superintendent will report on progress in implementing the action plan at regular public meetings of the board of education.	<ul style="list-style-type: none"> <li>Board receives regular updates about Plan</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>Superintendent Torres-Rodriguez provided the board of education with a detailed update on action plan implementation on March 24, 2017 (approximately one month after the plan was adopted by the board).</li> <li>Another progress report was delivered to the board on September 19, 2017. At about that same time, the board of education approved FourPoint’s appointment as Independent Monitor of the action plan.</li> <li>Superintendent Torres-Rodriguez has also provided updates to the board on action plan implementation, the Whole Student Framework, and the work of the independent monitor periodically through her information reports to the board.</li> <li>Board members were also provided with documents detailing action plan implementation that were developed by communications staff early in the implementation phase (see action step 9, this concern area).</li> </ul>		
6. The board of education will post the progress reports of the independent monitor on the district website.	<ul style="list-style-type: none"> <li>Reports from independent monitor posted on district website</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>HPS staff have posted the first report of the independent monitor on the district website (<a href="https://www.hartfordschools.org/studentsafety/">https://www.hartfordschools.org/studentsafety/</a>).</li> <li>District staff are expected to post subsequent reports similarly.</li> </ul>		
7. The board of education and the superintendent will establish protocols for sharing of information with families when reports are made to DCF and when investigations of such reports are completed.	<ul style="list-style-type: none"> <li>Protocols established</li> <li>Information shared as per protocols</li> </ul>	
<b>Evidence of Implementation</b>		
<ul style="list-style-type: none"> <li>The HPS Employee Misconduct and Child Abuse/Neglect Incident Checklist directs principals to contact parents or guardians of students involved in suspected child abuse or neglect reports. OTM and/or DCF must also solicit parental approval to interview students as part of an investigation. DCF is responsible for following up with parents to let them know the outcome of an investigation.</li> <li>Parents indicated that while they are informed of an open report and receive information from DCF about investigation results (i.e., whether the report is</li> </ul>		

<p>substantiated or not), that information often leaves them with more questions than answers. Most reports are unsubstantiated, but parents are not made aware of any program concerns or any other facts gathered during the investigation process. They may, however, know that an adult or adults who were part of the investigation were put on leave, suggesting that some wrong doing had occurred involving their child.</p> <ul style="list-style-type: none"> <li>This points to a need for HPS to develop protocols for following up with families after DCF investigations conclude to provide them with additional information about the incident (as appropriate) and explain what steps are being taken to ensure their student’s safety and well being, as needed.</li> </ul>		
<p>8. The superintendent will work with experts and community partners to develop and implement informational and educational programs for parents/families and students regarding suspected child abuse and neglect and suspected sexual abuse.</p>	<ul style="list-style-type: none"> <li>Experts and community partners are engaged</li> <li>Programs developed</li> <li>Programs implemented</li> <li>Parents and students participate in programs</li> <li>Parents and students report programs to be of high quality</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>The district has implemented its Tell Someone campaign and has provided more information on its website for parents and students regarding suspected child abuse and neglect.</li> <li>As noted in concern area 8, action step 1, the superintendent is working with community partners and relevant agencies to increase the prevention of child abuse and neglect in the district.</li> <li>Concern area 5, action step 2 includes information about how HPS has also engaged partners to expand its trauma-informed care practices and address the needs of children who have been abused or neglected.</li> <li>The district has not started a formal educational program for parents and families related to suspected child abuse and neglect and suspected sexual abuse.</li> </ul>		
<p>9. HPS will create a communications plan and follow-up to provide updates and engage families and the community during the implementation of the draft action plan.</p>	<ul style="list-style-type: none"> <li>Communications plan drafted</li> <li>Families engaged and updated per action plan</li> <li>Families report satisfaction with engagement</li> </ul>	
Evidence of Implementation		
<ul style="list-style-type: none"> <li>HPS created a communications plan in February 2017 with a number of activities intended to inform and engage families, students, and community partners around the district’s plans for ensuring student safety. This included roll out of the Tell Someone student safety campaign, outreach to and focus groups with students, letters to parents, community forum planning and implementation, and efforts to engage with partners who provide services and supports to students and families experiencing trauma, including abuse and neglect.</li> <li>While a majority of the items included in the plan have been accomplished, most dealt with early outreach and information about the OCA report and action plan and took place between February and April 2017. The communications division initially catalogued action plan-related activities and posted updates to the district’s website, but those efforts also ended in April 2017. Further communications has been limited to public updates at board of education meetings.</li> </ul>		

\*Red=not started or off track; Yellow=started and on track; Green=completed

## Concern Area 9 Recommendations

- a) Continue to report regularly at regular public meetings of the board of education about progress in implementing the action plan and provide updates on the district website.
- b) Establish protocols for sharing information with affected families when reports are made to DCF and when investigations of such reports are completed.
- c) Develop and implement an educational program for families related to suspected child abuse and neglect.
- d) Create and implement a communications plan to update and engage families and the community around implementation of the action plan.

## Overarching Recommendations

---

Based on the findings of this report, FourPoint has several overarching recommendations for improving implementation of the action plan and promoting a school and district culture in which students feel safe and ready to learn and adults feel valued and confident in administering their responsibilities.

- 1) Clarify roles and responsibilities for implementing the action plan by:
  - Adapting the action plan into a high-quality implementation plan.<sup>6</sup>
  - Assigning one senior-level district administrator to direct the execution and accomplishment of the implementation plan; ensure that this individual has the authority and resources to provide staff with direction, monitor performance, and hold them accountable for completing their assigned responsibilities.
  - Clarifying the role of the ombudsman as it relates to student safety and making changes to its organizational placement or responsibilities, as needed.
- 2) Apply improvement science<sup>7</sup> to maximize the impact of the action plan by:
  - Establishing high-level indicators of success as well as more detailed measures of implementation.
  - Tracking progress against the indicators and measures, reporting progress to stakeholders, and making adjustments to the implementation plan based on what is learned.
  - Convening a senior-level district administrator team, managed by the project director, that regularly reviews data related to reports, investigation results, program concern issues, and any information about reports that are not

---

<sup>6</sup> FourPoint included a sample implementation plan in its first report.

<sup>7</sup> See Bryk, A. et al. *Learning to Improve: How America's Schools Can Get Better at Getting Better*. Harvard Education Press, 2015.

picked up by DCF; provides a quarterly summary to the superintendent about data trends; and makes recommendations for improvements.

- Continuously seeking feedback from key stakeholders, including students and families, teachers, and principals.

3) Improve schools' culture while maintaining an aggressive stance on suspected child abuse and neglect by regularly engaging principals in discussions to:

- Clarify the decision-making process and criteria for placing a person on administrative leave and how the process attempts to protect people when an allegation is not substantiated.
- Allow them to provide feedback on the execution of the implementation plan.
- Examine data about reporting of suspected child abuse and neglect, bullying, and harassment of children and adults, including trends related to program concerns and reports that are not picked up by DCF.
- Help identify schools that appear to be creating cultures that are safe, nurturing, and conducive to learning, as well as factors contributing to those cultures.
- Help to communicate policies and best practices related to reporting and creating high-quality learning cultures.
- Help to distinguish between abusive or neglectful behaviors and those that do not constitute abuse or neglect but that do not reflect high standards for professional conduct and how to address both.
- Identify resources and supports that are needed to overcome student safety or school culture-related challenges in schools.
- Build capacity for staff training in high-need areas.

4) Establish a high-quality continuum of services that ensures that all students with disabilities receive the support they need to meet state academic standards.

## Appendix: Interviewees and Focus Group Participants

Findings in this report were informed by conversations with Hartford Public Schools staff and stakeholders in interviews and focus groups held January 24-26, 2018. FourPoint is grateful for the time and perspectives shared by these individuals.

Interviewees included:

- Andrea Johnson, President, Hartford Federation of Teachers
- Ann Smith, Executive Director, AFCAMP - African Caribbean American Parents of Students with Disabilities
- Catherine Carbone, Chief of Elementary and Middle Grades Education, Hartford Public Schools
- Catherine Corto-Mergins, Director of Training and The Village Collaborative Trauma Center, Village for Families and Children
- Christine Lau, Regional Administrator – Region 4, Connecticut State Department of Children and Families
- Courtney Cotter, Director of School Based Consultative Services, Center for Children with Special Needs
- Craig Stallings, Chair, Hartford Public Schools Board of Education
- Dr. Alberto Vazquez-Matos, Deputy Superintendent, Hartford Public Schools
- Dr. Leslie Torres-Rodriguez, Superintendent, Hartford Public Schools
- Dr. Sandra Inga, President, Hartford Federation of Principals’ and Supervisors’ Association
- Evette Avila, Executive Director of Elementary and Middle Grades Education, Hartford Public Schools
- Guillermo Garcia, Director of Information Management, Hartford Public Schools
- Jackie Aviles, Co-President, Hartford Federation of Paraprofessionals
- Joanne Tremblay-Jackson, Director of Student Support Services – Special Education Department, District Title IX Coordinator, Hartford Public Schools
- Jonathan Swan, Chief of Secondary Education, Hartford Public Schools
- Julia Wilde, Corporation Counsel, City of Hartford
- Julio Florez, Member, Hartford Public Schools Board of Education
- June Sellers, Executive Director of Special Education, Hartford Public Schools
- Karen Taylor, Member, Hartford Public Schools Board of Education
- Linda Blozie, Director of Training and Prevention, Connecticut Coalition Against Domestic Violence
- Mario Florez, Director of School Culture and Climate, Hartford Public Schools
- Marisa Halm, Director, TeamChild Juvenile Justice Project, Center for Children’s Advocacy
- Marta Bentham, Senior Director of Family Services and Ombudsman, Hartford Public Schools
- Maryann Guerra, Executive Director, Padres Abriendo Puertas – Parents Opening Doors
- Michael Downes, President, Hartford Federation of Substitute Teachers
- Michelle Puhlick, Executive Director of Policy and Innovation, Hartford Public Schools
- Milly Ramos, Labor Relations Specialist, Hartford Public Schools
- Oliver Barton, Executive Director of Secondary Education, Hartford Public Schools
- Pedro Zayas, Director of Communications, Hartford Public Schools
- Peter Dart, Assistant Superintendent of Talent Management, Hartford Public Schools

- Regina Dyton, Director of the Children’s Advocacy Center at Saint Francis Hospital and Medical Center
- Sabrina Tavi, Senior Staff Attorney, Child Abuse Project, Center for Children’s Advocacy
- Sandra Ward, Director of Community Partnerships, Hartford Public Schools
- Sarah Eagan, Child Advocate, State of Connecticut Office of the Child Advocate
- Sheila Terry, President, Hartford Federation of Special Police Officers
- Shellye Davis, Co-President, Hartford Federation of Paraprofessionals
- Suhail Aponte, Labor Relations Specialist, Hartford Public Schools
- Thomas Mooney, Partner, Shipman & Goodwin LLP

Focus groups participants included:

- Directors of Special Education, Hartford Public Schools (4)
- Teachers (general and special education), Hartford Public Schools (12)
- Principals, Hartford Public Schools (20)
- Central Harassment Prevention Team members (5)
- Parent members of the Hartford Parent University (24)