

CABE POLICY AUDIT REVIEW SERVICE

Woodbridge Public Schools Policy Manual November 14, 2018

This report represents a review of all existing Woodbridge School District policies, administrative regulations and Board of Education bylaws contained in the District's current policy manual. This review was undertaken to determine the following:

- a. The existing policies that should be kept with their current language.
- b. The existing policies that should be modified and/or replaced.
- c. Topics for which policy language is mandated by statute or recommended by CABE for inclusion in the manual, but is currently lacking.

The attached charts indicate, using CABE's codification numbers cross-referenced to Woodbridge's codification numbers and policy titles, where different, all policies in the current manual. An audit of a district's policy manual usually includes an analysis of any administrative regulations, which are a part of the current manual. Administrative regulations were a part of the District's current manual and were included in this audit review. The attached charts indicate for each policy in the current manual whether the policy as written is "appropriate as written" or whether revision is recommended.

It is CABE's recommendation that all administrative regulations be contained in the Board's policy manual, following the policy to which the regulation refers. This practice has been followed in the current policy manual of the District.

The comment, "appropriate as written," indicates that the policy fulfills current statutory language and/or is in compliance with judicial action. However, the term, "appropriate as written," should not be viewed as indicating that this is the "best" wording or necessarily the best and/or only position on the specific policy topic. Only a process involving the complete review of the existing manual or electing to review specified policies will determine whether the District would want to alter its currently stated policy position and statement on a given policy issue. The term, "appropriate as written," indicates that as written the current policy provides sufficient direction and reflects the Board's philosophy on the topic. If CABE is contracted to work with the Woodbridge School District in the total or partial revision of this existing manual, other sample policies, bylaws and/or administrative regulations would be given to provide a basis for comparison and for consideration of new policy language and direction. However, as CABE members, the District at any time could request additional policy models to consider comparing to the District's existing policy language.

The overwhelming majority of the current policies and bylaws were judged to be "appropriate as written" within the meaning of the phrase as described above.

A key issue to consider regarding policy statements pertains to the amount of content contained within them. By law, only the Board can make policy, but the broadness or the succinctness of policy statements is reserved to the Board's judgment. A broad policy statement, i.e., succinctly stated, gives the Superintendent much discretion in its execution, while a detailed lengthy

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statement gives him/her less. If a policy is narrowly stated, it may not appropriately address the needs of all the schools. If too broad or vague, the Board may be neglecting its legal responsibility for the governance of the schools. Therefore, Board policy should contain sufficient content to reflect the Board's views or philosophy on a given topic and to clearly provide direction to the Superintendent, administrative staff, District employees and the community.

The policies contained in this manual exhibited a range or variety, concerning the amount of content, often depending on the specific topic. Some are succinctly stated while others are more detailed. The topic of the policy or recent legislative actions may account for some of the variety, in addition to local considerations.

Other factors impacting the detail contained within policy include the amount of discretion allowed by law, the clarity of the issue, community sensitivity to the issue and the amount of support the administrator needs. This can vary, depending on the policy topic, or at times, conditions within the local district. Recent legislative action, on the state and federal level, has exhibited a trend for very detailed, prescriptive policies to comply with the new legislation.

The recommendations for revision, where utilized for a specific policy, are based upon different factors, including changes in federal and state legislation, judicial decisions, or positions that are not in compliance with current recommended policy direction.

Further, the age of a policy, by itself, is not the basis for a recommendation to revise it. It is possible to have a policy adopted twenty or more years ago that is still acceptable as written. Conversely, a policy recently adopted may need revision or replacement, due to legislative changes, recent judicial decisions or changes in the Board's viewpoint and desired direction.

SUMMARY OF ANALYSIS:

1. Overall, the current policy manual of the Woodbridge Public School District is in good condition providing the necessary direction to the Board, Superintendent, staff and the community. This judgment is based upon the current content of the manual. The District subscribes to CABE's *Policy Update Service* publication and the *Connecticut Online Policy Service (C.O.P.S.)*. The District's conscientious use of these services will make it possible to make timely revisions and/or additions to the current manual in order to keep its manual up-to-date capitalizing on its current good condition. The District needs to make continual use of the material presented in the quarterly *Policy Update Service* publication to better keep the manual up-to-date. Regretfully, not utilizing this resource to its maximum has resulted in a number of policies to be revised or to be added to the existing manual.
2. The bulk of the existing manual, 88.0%, was completed in the three school/fiscal years encompassing 2011 through 2014. The District utilized CABE's *Custom Policy Service* in the development of its new manual. Yearly, additions have been made to the manual since that time as will be seen in the table presented later in this report. In the 2007-2008 school year, the District's manual was placed online utilizing CABE's "*Connecticut Online Policy Service (C.O.P.S.)*". This facilitated Board, staff, and community access to the manual and to the

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SUMMARY OF ANALYSIS (continued)

revisions being made to it as part of the aforementioned total reworking of the manual. The placement of the manual online provides a timely means to be sure that what is posted represents the latest versions of the policies adopted by the Woodbridge Board of Education.

The District has also maintained its subscription to the quarterly *Policy Update Service* publication service mentioned previously, to keep its manual up-to-date.

3. The District's current manual is not considered a complete manual containing most of the number of policy areas found in contemporary policy manuals and recommended by CABE. Therefore, some additional policy topics should be considered to add to the policy manual based upon increased use of technology and emerging new policy topics. The current manual does address, to a degree, an appropriate number of policy areas providing sufficient direction for administrative decision-making and action with Board policy direction. However, the manual should have some additional policies added, especially in Series 3000 (Business/Non-Instructional Operations), Series 4000 (Personnel), and Series 6000 (Instruction) which will be addressed later in this summary. Most of these additional policies are recommended by CABE, with their possible inclusion in the manual left entirely to the discretion of the Board. These are considered "good practice" policies. Some are missing mandated policies.
4. The current manual lacks seven (7) mandated policy topics and seventy-one (71) policy areas that are recommended by CABE for possible inclusion in the manual. This will be addressed in this analysis. This reinforces the need for the District to continue to subscribe and to make conscientious use of the *Policy Update Service* publication sent to the District in order to keep the manual up-to-date.
5. It is obvious from the analysis that the school system gave extensive and appropriate attention to policy issues during the aforementioned school/fiscal years, 2011-2012, 2012-2013, and 2013-2014. During that three year period, District efforts resulted in the adoption of one-hundred ninety-one (191) policies or 88.0% of the current manual. Some additional policies and revisions are evident over the years since the initial development of the manual.
6. It appears from the analysis that the school system has given limited attention to policy issues since the aforementioned school/fiscal years, judging by the adoption dates of the policies in the current manual since that period of time. That attention can be best described as "limited." The Board needs to give attention to policy issues to either adopt new policies or to revise existing ones. The following chart indicates policy adoption action by the Woodbridge Public Schools Board of Education since the 2010-2011 school year to the present, based on the adoption or revision dates of the policies in the current manual.

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SUMMARY OF ANALYSIS (continued)

<u>School Year</u>	<u>Number of Policies Adopted</u>	<u>Percentage of Amount</u>
Prior 2010-2011	19 (plus 11 revisions)	8.8%
2010-2011	0	0.0%
2011-2012	84 (plus 2 revisions)	38.7%
2012-2013	14	6.5%
2013-2014	93 (plus 1 revision)	42.9%
2014-2015	0	0.0%
2015-2016	0 (plus 2 revisions)	0.0%
2016-2017	2 (plus 1 revision)	0.9%
2017-2018	3 (plus 2 revisions)	1.4%
2018-2019	0	0.0%
Unknown	2	0.9%
TOTALS:	217 (plus 19 revisions)	100%

7. Two-hundred and seventeen (217) policy titles were reviewed. This is considered less than an appropriate number of policy titles believed necessary in the current educational and societal environment. The current manual does not, as is the recommended practice by CABE, cross-reference bargaining unit agreements. Policies in Series 4000 are recommended to be cross-referenced to bargaining unit agreements, where applicable, via the Table of Contents. This practice is not done in the current manual.
8. Policies in the current personnel section (Series 4000) are, as is the recommended customary codification practice, dual codified when they apply to both certified and non-certified staff. Moreover, the heading on the policies indicate when applicable to certified and non-certified personnel.

Seven (7) policies were identified as applicable to both certified and non-certified personnel and were appropriately dual codified. This represents 50.0% of the personnel policies. However, the Series 4000 is sparse, containing only 14 policies in total. Four of the fourteen policies were identified as applicable to both certified and non-certified staff which should, therefore, be dual codified.
9. The over-whelming majority of the policies contained in the manual were judged to be "appropriate as written." This represents one-hundred eighty-five (185) or 85.3% of the manual's current policies.
10. Thirty-two (32) policies are recommended for modification. This represents 14.7% of the manual's current contents.
11. Six of the existing policies are recommended for deletion and/or replacement. These are identified in the accompanying charts to this report. The bulk of the policies recommended for deletion or replacement are in Series 5000 (5).

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12. Thirty-two (32) policies require either an updating of the existing legal references or the addition of legal references. This represents 14.7% of the manual's current policies. This does not affect, however, in any manner, the usage of the current policies so identified, unless the policy is one identified as also needing revision.
13. The current manual is codified utilizing CABE's national policy manual codification system. Therefore, the existing sections correspond to CABE's policy manual sections. The current manual contains all sections which are recommended for inclusion. Ten (10) policies were identified as needing to be recodified. This represents 4.6% of the manuals' contents.
14. All policies are appropriately titled and their placements, with some exceptions, are in the proper topical settings or series of the existing policy manual.
15. One-hundred twenty-five (125) existing policies are based upon CABE models. This represents 57.6% of the current manual. This large number is based upon the fact that the District utilized CABE's services in the development of the existing manual.
16. One policy requires a specific adoption date. This represents 0.5% of the current manual. The adoption date needs to reflect the date formal Board action was taken and recorded in the minutes as such, giving the policies legal status.
17. Administrative regulations, as previously stated, are placed in the manual following the policies to which they correspond.
18. Policies and bylaws in the current manual are appropriately cross-referenced to each other, as is the recommended customary practice, to other policies and bylaws, which relate to the same issues.
19. The District, as previously indicated, is currently a subscriber to CABE's *Policy Update Service*. Continued and conscientious utilization of this service will greatly assist the District in keeping its policy manual up-to-date and to provide some policies, regulations and background information for the Board to consider. Greater attention should be given on a yearly basis to the identification of policies to review and to either readopt "as-is" or to revise.
20. Seventy-nine (79) new policies are recommended for consideration, adoption and possible inclusion in the manual. Of this number, eight (8) are policies mandated by state or federal law. The specific titles are contained in the accompanying charts and are also listed below. This is considered a relatively low number of mandated policies to be lacking. Seventy-one (71) recommended policies for inclusion in Woodbridge's manual are considered "good practice policies." These are strongly recommended by CABE but are not mandated by law for inclusion. Their inclusion is and remains a local Board decision. Their titles are found in the charts accompanying this report.

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SUMMARY OF ANALYSIS (continued)

The missing mandated policies are:

- #3542.22 – Food Services Personnel Code of Conduct
- #3542.43 – Food Services Charging Policy
- #4212.42 – Drug and Alcohol Testing for Bus Drivers
- #5125.11 – Health/Medical Records (HIPAA)
- #5144.2 – Use of Exclusionary Time Out (Policy required by Jan. 1, 2019)
- #5144.4 – Physical Exercise and Discipline of Students
- #5145.5 – Sexual Harassment
- #5145.511 – Sexual Abuse Prevention Education Program

21. The current manual, as previously indicated, contains administrative regulations. As previously indicated, CABE recommends that administrative regulations, where in existence, should be placed following the policy to which it addresses in the policy manual. Twenty-two (22) administrative regulations in the current manual are appropriate as written. In three (3) situations an administrative regulation is recommended either for development or revision to follow the related policy.
22. The manual contains a Table of Contents before each series. It appears that the listings in the Table of Contents represent all of the topics contained in the section.
23. In six situations there were duplicate identical policies, with different codifications. In such situations, the duplicate policies can be removed by action of the Board. These situations are identified in the charts accompanying this audit report.

The charts which accompany this report provide a detailed review of the current manual's contents.

RECOMMENDATIONS

As per our agreement for this Policy Audit Service, this report, with its accompanying charts, provides a summary detailing the existing policies which should be kept, those that should be modified or replaced and the identification of policy areas which are mandated and/or recommended but are lacking in the existing manual. Sample policy language is not provided at this time as part of this audit service.

However, as specified, recommendations as to the manner the Woodbridge Board of Education may proceed follow for your consideration.

1. The Woodbridge Board of Education does not need to consider utilizing CABE's *Customized Policy Service* that will result in the development of a totally new policy manual for the District. A totally new manual is not believed necessary at this time based upon the latest development of the current manual and, based upon the good condition of the current manual. The number of recommended modifications and the number of mandated and/or recommended

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RECOMMENDATIONS (continued)

policies, which are lacking and for which consideration should be given to becoming a part of the District's policy manual can be accomplished without the need for a complete reworking of the existing manual.

However, a complete review, if desired by the Board, would provide the District and its current Board of Education and the Superintendent with an excellent and timely opportunity, to completely review and reassess its position on all existing policy topics and provide, where desired, the opportunity to revise existing policies to be in greater concert with the beliefs of the existing Board, while adding new policies. In addition, such a review would also include administrative regulations where existing and/or recommended.

The Customized Policy Service includes the following: (Not recommended as necessary at this time but presented as an option to consider if a complete revision of the manual is desired by the Board, providing an opportunity for the Board to reconsider its position on all policy topics.)

- Review and analysis of existing policies for relevancy and compliance with federal and state statutes and regulations.
- Review of current bargaining unit agreements, student and personnel handbooks and other material for explicit and implied policies.
- Updating of existing policies.
- Legal referencing of policies to Connecticut and U.S. Statutes, Federal/State regulations and judicial decisions.
- Development of needed policies and regulations.
- Codification of policies and administrative regulations under the current CABE codification system.
- Printing of all policies and regulations and their arrangement in a codified two-volume manual provided for all Board members, the Superintendent, and three additional copies.
- The manual provided electronically to facilitate future revisions and updating and to facilitate revisions of the manual on the District's website.

The cost of this service, under current pricing, based upon the student enrollment of the District, is \$8,350. This can be paid over two fiscal/school years @ \$4,175 per year or over three school/fiscal years at \$2,784 per year. This type of project normally requires approximately two to three years to complete. I do not believe, nor am I recommending the *Custom Policy Service* at this time, based as previously indicated, on the good condition of the present manual, with eighty-five percent of the current policies considered appropriate as written. It is presented here, as an option, only if the existing Board wishes to engage in a process to review the contents of the entire existing manual, resulting in a new manual, correcting all of the issues listed in this audit report.

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RECOMMENDATIONS (continued)

2. It is recommended that the District elect to maintain its present manual, and the CABE codification system and only revise the policies indicated in the report in addition to adding the missing mandated policies and consider adding some of the “good practice” policies, which have been recommended but are lacking. If this option is chosen CABE can provide:
 - Revisions, and in some cases replacements, of the thirty-two policies indicated needing such revision and, in addition, where appropriate, to send the District some additional samples to consider.
 - Sample policies in the areas where the chart indicates policies are lacking but recommended for consideration and inclusion in the manual. (Those identified as mandated (8) and recommended (71), but lacking.)
 - Material also provided electronically to facilitate local development/revision of the material sent from CABE.

The cost for this service would be \$5,000. This would be payable, if desired over two school/fiscal years with two equal payments of \$2,500.

CABE will provide first drafts of the material to consider, and also a second copy of the draft policies incorporating and modification made during the District’s review process. This second copy would be brought to the Board of Education for its consideration and adoption. CABE would also print the adopted policies, in sufficient numbers for the existing manuals, not to exceed fifteen copies, as part of this fee. In addition, CABE would also provide the adopted policies in electronic format in order to facilitate future revisions at the District level. CABE would also post the new or revised policies on the online version of the Woodbridge manual.

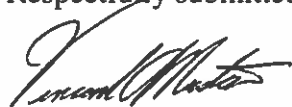
If this option is chosen, for a total fee of \$5,000, the District will have an up-to-date manual.

3. The District could also do a revision of its current manual based upon the purchase and use of the *Connecticut Reference Manual of School Board Policies, Regulations and Bylaws*, available on CD for \$400. This generic core policy manual, in Word format to facilitate its local use, consists of approximately 450 examples of policies, administrative regulations and bylaws. The District could utilize this resource in comparing its present manual to that contained in the generic manual and revise where deemed necessary. This generic manual is also available to CABE members, at no additional cost, in the member section of the CABE website, as a PDF document.

I am prepared to discuss any aspect of this report and its recommendations. CABE is anxious to be of further service to the Woodbridge Board of Education in meeting its policy needs and responsibilities.

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Respectfully submitted,



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Attachment: CABE's Policy Review of Woodbridge Public Schools Existing Policy Material