Policy Committee

Monday, March 2, 2020 6:00 PM
Policy Committee, L.P. Wilson Community Center, Room 17, 601 Matianuck Avenue, Windsor, CT 06095

1. **Call to Order, Pledge to the Flag and Moment of Silence**
2. **Audience to Visitors**
3. **New BL 9240 Board Member Development**
4. **Revise P 1331 Prohibition Against Smoking**
5. **Revised P/AR 5118.1 Homeless Children and Youth**
6. **New P/AR 5141.214 Policy and Regulation Concerning Sunscreen Application in School**
7. **Revised P 5141.25 Management Plan and Guidelines for Students with Food Allergies, and/or Glycogen Storage Disease**
8. **Revised P 5141.4 Reports of Suspected Abuse or Neglect of Children or Sexual Assault of Students by School Employees**
9. **Revised P 5144.1 Physical Activity and Student Discipline**
10. **Revised P/AR 5145 Policy Regarding Students and Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990**
11. **Adjournment**

Rational for New Bylaw:

BL-9240 Board Member Development

At the request of the executive committee, the addition of this bylaw will clarify professional development opportunities for Board members.

BOARD MEMBER DEVELOPMENT

The complexity of Board of Education membership demands opportunities for development, study and training for Board members. The Board of Education places a high priority on the importance of a planned and continuing program of in-service education for its members.

In order to develop leadership capabilities, become informed about current issues in education, and improve their skills as members of a policy-making body, Board members will participate in opportunities for development that may include, but not be limited to, the following:

- In-service activities planned by the Board and by the administration for staff members, as appropriate;

- Participation in conferences, workshops and conventions held by State and National School Boards Associations and other educational organizations;

- Subscriptions to publications addressing Board member concerns.

Recognizing the need for continuing training and development of its members, the Board of Education encourages the participation of all members in appropriate conferences, conventions and workshops. To control both the investment of time and funds necessary to implement this policy, the Board establishes these principles and procedures for its guidance:

- The Superintendent of Schools will inform Board members, in a timely manner, of upcoming conferences, conventions and workshops. The Board will decide which meetings appear to be most likely to produce the greatest benefit to the Board and the district;

- Funds for participation at such meetings will be budgeted. When funds are limited, the Board will designate which members would be most appropriate to participate at a given meeting;

- If authorized to attend, and reimbursement is approved by the entire Board, Board members will be reimbursed, upon request, for reasonable and necessary expenses actually incurred;

- When a conference, convention or workshop is not attended by the full Board, those who do participate will be requested to share, by means of written or oral reports, information, recommendations and materials acquired at the meeting.

Adopted:

Windsor Public Schools
Windsor, CT

Rational for Revised Policy:

P 1331 Prohibition Against Smoking

We have updated the smoking model policy to prohibit smoking on school grounds, as provided by PA 19-13. Previously, the policy only prohibited smoking within indoor facilities.

PROHIBITION AGAINST SMOKING

The Windsor Board of Education ("Board") prohibits smoking, including smoking using an electronic nicotine delivery system (e.g. e-cigarettes) or vapor product, ~~**on the real property of**~~ **within** any of its schools, including any indoor facility owned or leased or contracted for, and utilized by the Board for the provision of routine or regular kindergarten, elementary, or secondary education or library services to children or on the grounds of such school ~~**or administrative office building**~~ or at any school-sponsored activity. ~~**Real property means the land and all temporary and permanent structures comprising the district's elementary and secondary schools, and administrative office building and includes, but is not limited to, classrooms, hallways, storage facilities, theatres, gymnasiums, fields and parking lots.**~~ For purposes of this policy, the term "electronic nicotine delivery system" shall mean an electronic device ~~**that may be**~~ used ~~**to simulate smoking**~~ in the delivery of nicotine or other substances to a person inhaling from the device and includes, but is not limited to, an electronic cigarette, electronic cigar, electronic cigarillo, electronic pipe or electronic hookah and any related device and any cartridge or other component of such device, ~~**and the**~~ including, but not limited to, electronic cigarette liquid. The term "vapor product" shall mean any product that employs a heating element, power source, electronic circuit or other electronic, chemical or mechanical means, regardless of shape or size, to produce a vapor that may or may not ~~contain~~include nicotine ~~**that and**~~ **is inhaled by the user of such product.** ~~As defined by Conn. Gen. Stat. § 10-233a(h), a~~ The term "school-sponsored activity ~~"means~~" shall mean any activity sponsored, recognized or authorized by ~~**a board of education**~~the Board and includes activities conducted on or off school property.~~"~~

Legal References:

Public Act 19-13
Conn. Gen. Stat. § ~~53-344b~~10-233a(h)
Conn. Gen. Stat. § 19a-342
Conn. Gen. Stat. § 19a-342a
Conn. Gen. Stat. § 53-344b
Pro-Children Act of 2001, Pub. L. 107-110, 115 Stat. 1174, 20 U.S.C. § 7183

ADOPTED: November 15, 2016

Windsor Public Schools
Windsor, CT

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Series 1000
Community/ Board Operations

PROHIBITION AGAINST SMOKING

The [_____] Board of Education ("Board") prohibits smoking, including smoking using an electronic nicotine delivery system (e.g., e-cigarettes) or vapor product, within any of its schools, including any indoor facility owned, or leased or contracted for, and utilized, by the Board, for the provision of routine or regular kindergarten, elementary, or secondary education or library services to children, or on the grounds of such school, or at any school-sponsored activity. For purposes of this policy, the term "electronic nicotine delivery system" shall mean an electronic device that may be used to simulate smoking in the delivery of nicotine or other substancesubstances to a person inhaling from the device and includes, but is not limited to, an electronic cigarette, electronic cigar, electronic cigarillo, electronic pipe or electronic hookah and any related device and any cartridge or other component of such device, and the term "vapor product" shall mean any product that employs a heating element, power source, electronic circuit or other electronic, chemical or mechanical means, regardless of shape or size, to produce a vapor that may or may not contain nicotine, that is inhaled by the user of such product.

[Note: This policy provides the minimum prohibition against smoking as required under both state and federal law. However, boards have legal authority to enact a broader prohibition against smoking that would ban smoking on all school property, including administrative office buildings and school grounds, as well as at school-sponsored activities. Adoption of such a policy could have collective bargaining implications that boards should be aware of prior to adopting such a broad prohibition. Boards are therefore advised to consult legal counsel prior to adoption of the broad prohibition set forth below.]

[PROHIBITION AGAINST SMOKINGThe [_____] Board of Education prohibits smoking, including smoking using an electronic nicotine delivery system (e.g. e-cigarettes) or vapor product, on the real property of any school or administrative office building or at any school-sponsored activity. Real property means the land and all temporary and permanent structures comprising the district's elementary and secondary schools, and administrative office building and includes, but is not limited to, classrooms, hallways, storage facilities, theatres, gymnasiums, fields and parking lots. For purposes of this policy, the term "electronic nicotine delivery system" shall mean an electronic device that may be used to simulate smoking in the delivery of nicotine or other substance to a person inhaling from the device and includes, but is not limited to, an electronic cigarette, electronic cigar, electronic cigarillo, electronic pipe or electronic hookah and any related device and any cartridge or other component of such device, and the including, but not limited to, electronic cigarette liquid. The term "vapor product" shall

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Rational for Revised Policy and Regulation:

P/AR 5118.1 Homeless Children and Youth

The Homeless Children and Youth model policy has been revised in accordance with Public Act 19-179 to incorporate changes concerning the hearing and appeal process afforded to school-age homeless children and youth who are denied access to school accommodations, under Connecticut General Statutes Section 10-186. The policy was further revised to clarify the rights of unaccompanied youth.

Public Act 17-194, provides that unaccompanied youth -- a homeless child or youth not in the physical custody of a parent or guardian -- must be given access to his/her own education, medical, or similar records. This policy has been updated to include a legal reference to the Act, and the model administrative regulations accompanying the policy have been revised to reflect the Public Act 17-194's requirements.

Section:	**STUDENTS**	
Subject:	**HOMELESS CHILDREN AND YOUTH**	**P-5118.1**

BOARD OF EDUCATION POLICY
WINDSOR PUBLIC SCHOOLS
WINDSOR, CT

In accordance with federal law, it is the policy of the Windsor Board of Education (the "Board") to prohibit discrimination against, segregation of, or stigmatization of, homeless children and youth. The Board authorizes the Administration to establish regulations setting forth procedures necessary to implement the requirements of law with respect to homeless children and youth. In the event of conflict between federal and/or state law and these administrative regulations, the provisions of law shall control.

Legal References:

State Law:

Public Act ~~17-194,~~ 19-179, "An Act Concerning Homeless Students' Access to ~~Student Records for Certain Unaccompanied Youths~~Education"

10-186 Duties of local and regional boards of education re school attendance. Hearings. Appeals to state board. Establishment of hearing board. Readmission. Transfers

10-253~~(e)~~ School privileges for children in certain placements, non-resident children and children in temporary shelters

Federal Law:

The McKinney-Vento Homeless Education Assistance Act, 42 U.S.C. §§ 11431 et seq. , as amended by Every Student Succeeds Act, Pub. L. 114-95.

Policy adopted: September 21, 2010

Section:	**Students**	
Subject:	**HOMELESS CHILDREN AND YOUTH**	**AR-5118.1**

ADMINISTRATIVE REGULATION
WINDSOR PUBLIC SCHOOLS
WINDSOR, CT

In accordance with federal law, the Board of Education (the "Board") does not permit discrimination against, segregation of, or stigmatization of, homeless children and youth. The following sets forth the procedures to implement the requirements of law with respect to homeless children and youth. In the event of conflict between federal and/or state law and these regulations with respect to homeless children and youth, the provisions of law shall control.

1. Definitions:

   A. **Enroll and Enrollment:** includes attending classes and participating fully in school activities.

   B. **Homeless Children and Youth:** means children and youth twenty-one ~~(21)~~ years of age and younger who lack a fixed, regular, and adequate nighttime residence, including children and youth who:

      1. Are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason.

      2. Are living in motels, hotels, trailer parks or camping grounds due to the lack of alternative adequate accommodations.

      3. Are living in emergency or transitional shelters.

      4. Are abandoned in hospitals.

      5. ~~Are awaiting foster care placement.6.~~Have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings.

      ~~7.~~6. Are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.

      ~~8.~~7. Are migratory children living in the above described circumstances.

C. **School of Origin:** means the school that a homeless child or youth attended when permanently housed or the school in which the homeless child was last enrolled. , School of origin may include preschool administered by the District and, when a homeless child or youth completes the final grade level served by the school of origin, school of origin also includes the designated receiving school at the next grade level for all feeder schools.

D. **Unaccompanied Youth:** means a homeless child or youth not in the physical custody of a parent or guardian.

2. Homeless Liaison:

A. The District's Homeless Liaison is the Director of Pupil and Special Education Services.

B. The duties of the Homeless Liaison include:

1. Ensuring that homeless children and youth are identified by school personnel and through outreach and coordination ~~activities~~ with other entities and agencies.

2. Ensuring that homeless children and youth enroll in, and have full and equal opportunity to succeed in~~,~~ the District's schools, including ensuring that such homeless children and youth have opportunities to meet the same challenging State academic standards as other children and youths.

3. Ensuring that homeless families, children, and youths receive educational services for which such families, children and youth are eligible, including services through Head Start and Even Start, early intervention services under Part C of the Individuals with Disabilities Education Act and preschool programs administered by the District.

4. Ensuring that parents and guardians of homeless children and youth and unaccompanied youth receive referrals to health care services, dental services, mental health and substance abuse services, housing services, and other appropriate services.

ADMINISTRATIVE REGULATION
WINDSOR PUBLIC SCHOOLS
WINDSOR, CT

5. Ensuring that parents and guardians of homeless children and youth and unaccompanied youth are informed of educational and related opportunities available to ~~their~~homeless children and youth, including extracurricular activities, and that parents and guardians of homeless children and youth are provided with meaningful opportunities to participate in the education of their children.

~~5.~~ 6. Ensuring that public notice of the educational rights of homeless children ~~and youth is disseminated in places in which these children and youth receive services~~ under the McKinney-Vento Act~~.~~ is disseminated in locations frequented by parents, guardians, and unaccompanied youth in a manner and form that is understandable to them.

~~6.~~ 7. Ensuring that enrollment disputes are mediated in accordance with the McKinney-Vento Act~~.~~, including carrying out the initial dispute resolution process and ensuring that homeless students are immediately enrolled pending resolution of any enrollment dispute.

~~7.~~ 8. Ensuring that parent(s)/guardian(s) of homeless children and youth ~~or~~and unaccompanied youth are fully informed of all transportation services, including transportation to and from the school of origin, and are assisted in accessing those services.

~~8.~~ 9. Assisting homeless children and youth in enrolling in school and accessing school services and removing barriers to enrollment and retention due to outstanding fees, fines or absences.

~~9.~~ 10. Informing parent(s)/guardian(s) of homeless children and youth and unaccompanied youth, school personnel, and others of the rights of such ~~children and youth~~students..

~~10.~~11. Assisting homeless children and youth who do not have immunizations or immunization/medical records to obtain necessary immunizations or immunization/medical records.

~~11.~~12. Assisting unaccompanied youth in placement/enrollment decisions, including considering the unaccompanied youth's wishes in those decisions, and providing notice to the unaccompanied youth of his or her right to appeal such decisions.

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WINDSOR PUBLIC SCHOOLS
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~~12. Ensuring that homeless children and youth and unaccompanied youth are immediately enrolled in school pending resolution of disputes that might arise over enrollment or placement.~~

13. ~~Collaborating and coordinating with State Coordinators for the Education of Homeless Children and Youth and community and school personnel responsible for providing education and related support services to homeless children and youth.~~Ensuring that high school age homeless children and youth receive assistance from counselors to advise such youths on preparation and readiness for college, including informing such children and youths of their status as independent students under the Higher Education Act of 1965 and that they may obtain assistance from the district to receive verification of this status for purposes of the Free Application for Federal Student Aid (FAFSA).

14. Ensuring collaboration with community and school personnel responsible for providing education and related support services to homeless children and youth.

15. Collaborating with and participating in professional development and technical assistance activities offered by the State Office of the Coordinator for the Education of Homeless Children and Youth.

16. Ensuring that school personnel providing services to homeless children and youth receive professional development and other technical assistance activities regarding the McKinney-Vento Act.

17. Ensuring that unaccompanied youth are enrolled in school and that procedures are implemented to identify and remove barriers that prevent them from receiving credit for full or partial coursework satisfactorily completed at a prior school, in accordance with State, local, and school policies.

18. With appropriate training, affirming that a child or youth who is eligible for and participating in a program provided by the District, or the immediate family of such a child or youth, is eligible for homeless assistance programs administered under Title IV of the McKinney-Vento Act.

ADMINISTRATIVE REGULATION
WINDSOR PUBLIC SCHOOLS
WINDSOR, CT

3. Enrollment of Homeless Children and Youth:

   A. Enrollment of homeless children and youth may not be denied or delayed due to the lack of any document normally required for enrollment. However, administrators shall require the parent/guardian or unaccompanied youth to provide contact information prior to enrollment.

   B. To facilitate enrollment administrators:

      1. May permit parents/guardians of homeless children and youth and unaccompanied youth to sign affidavits of residency to replace typical proof of residency.

      2. May permit unaccompanied youth to enroll with affidavits to replace typical proof of guardianship.

      3. Shall refer parent/guardian/unaccompanied youth to the Liaison who will assist in obtaining immunizations.

      4. Shall contact previous schools for records and assistance with placement decisions.

      5. Shall maintain records so that the records are available in a timely fashion when the student enters a new school or school district.

4. School Selection:

   A. Standards for School Selection:

      1. The District is required to make a determination as to the best interests of a homeless child or youth in making a determination as to the appropriate school of placement.

      2. In making such a determination, the District is required to keep a homeless child or youth in his/her school of origin for the duration of homelessness when a ~~family~~homeless child or youth becomes homeless between academic years or during an academic year; or for the remainder of the academic year if the homeless child or youth becomes permanently housed during an academic year, to

the extent feasible, unless it is against the wishes of the parent or guardian or unaccompanied youth. Otherwise, the homeless child or youth shall be enrolled in a public school that non-homeless students who live in the area where the homeless child or youth is actually living are eligible to attend.

3. The District must presume that keeping the homeless child or youth in the school of origin is in the child's or youth's best interest unless doing so is contrary to the request of the child's or youth's parent or guardian, or in the case of an unaccompanied youth, the unaccompanied youth. In considering the child's or youth's best interest, the District must consider student-centered factors related to the child's or youth's best interest, giving priority to the request of the parent or guardian or unaccompanied youth.

B. Procedures for Review of School Selection Recommendation:

1. The Principal or his/her designee of the school in which enrollment is sought review an enrollment request in accordance with the standards discussed above, and shall make an initial recommendation regarding same. If the Principal or his/her designee's recommendation is to select a placement other than the school desired by the parent(s) or guardian(s) of the homeless child or youth or the unaccompanied youth, then the Principal or his/her designee shall refer the matter to the Superintendent or his/her designee for review of the recommendation and the reasons therefore, and shall notify the District's Homeless Liaison of same.

2. The Superintendent or his/her designee shall review the matter and consult with the District Homeless Liaison concerning same. If the Superintendent or his/her designee agrees with the recommendation of the Principal or his/her designee, and a dispute remains between the District and the parent(s) or guardian(s) of a homeless child or youth or an unaccompanied youth about a school selection and/or enrollment decision; the Superintendent or his/her designee shall provide the parent(s) or guardian(s) of a homeless child or youth or an unaccompanied youth with a written explanation of the District's decision regarding this matter, and the right to appeal such decision to the Board ~~of Education~~.

ADMINISTRATIVE REGULATION
WINDSOR PUBLIC SCHOOLS
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C. Dispute Resolution Process:

1. The District's Homeless Liaison shall be responsible for promoting objective and expeditious dispute resolutions, and adherence to these administrative regulations.

2. If the parent(s) or guardian(s) of a homeless child or youth or an unaccompanied youth disputes the school placement decision or enrollment, the District must immediately enroll the homeless child or youth in the school in which enrollment is sought, pending resolution of the dispute. The homeless child or youth shall also have the right to all appropriate educational services, including transportation to and from the school in which enrollment is sought, while the dispute is pending.

3. If necessary, the District Homeless Liaison shall assist parent(s) or guardian(s) of a homeless child or youth or an unaccompanied youth with completion of the necessary appeal paperwork required to file for an appeal to the Board ~~of Education~~, and provide the parent(s) or guardian(s) of a homeless child or youth or an unaccompanied youth with a copy of Section 10-186(b).

4. ~~Within~~Not later than ten (10) days ~~of~~after receipt of an appeal to the Board ~~of Education~~ by a parent(s) or guardian(s) of a homeless child or youth or an unaccompanied youth, the District shall hold a hearing before the Board ~~of Education~~ concerning such appeal, and such hearing shall be shall be conducted in accordance with Section 10-186(b).

5. If the Board ~~of Education~~ finds in favor of the Superintendent or his/her designee, a parent or guardian of a homeless child or youth or unaccompanied youth may appeal the Board ~~of Education~~'s decision to the State Board of Education within twenty (20) days of receipt of the Board ~~of Education~~'s written decision, in accordance with Section 10-186(b). If necessary, the District Homeless Liaison shall assist a parent or guardian of a homeless child or youth or unaccompanied youth with filing the necessary appeal paperwork to the State Board of Education. The homeless child or youth or unaccompanied youth shall remain in his or her

school of origin pending ~~the determination~~resolution of the ~~appeal~~dispute, including all available appeals.

5. Services:

   A. Homeless children and youth shall be provided with services comparable to those offered other students in the selected school including:

      1. Title I services or similar state or local programs, educational programs for students with disabilities, programs for students with limited English proficiency, and preschool programs.

      2. Transportation services.

      3. Vocational and technical education.

      4. Programs for gifted and talented students.

      5. School nutrition programs.

      6. Before and after school programs.

   B. The District shall coordinate with local social service agencies, other service providers, housing assistance providers and other school districts to ensure that homeless children and youth have access and reasonable proximity to available education and support services.

6. Transportation:

   A. The District shall provide transportation comparable to that available to other students.

   B. Transportation shall be provided, at a parent or guardian or unaccompanied youth's request, to and from the school of origin for a homeless child or youth. Transportation shall be provided for the entire time the child or youth is homeless and until the end of any academic year in which they move into permanent housing. Transportation to the school of origin shall also be provided during pending disputes. The Liaison shall request transportation to and from the school of origin for an

unaccompanied youth. Parents and unaccompanied youth shall be informed of this right to transportation before they select a school for attendance.

C. To comply with these requirements:

1. Parents/guardians, schools, and liaisons shall use the district transportation form to process transportation requests.

2. If the homeless child or youth is living and attending school in this District, the District shall arrange transportation.

3. If the homeless child or youth is living in this District but attending school in another, or attending school in this District and living in another, the District will follow the inter-district transportation agreement to determine the responsibility and costs for such transportation. If there is no inter-district transportation agreement, the District shall confer with the other school district's Homeless Liaison to determine an apportionment of the responsibility and costs.

4. If no mutually agreeable arrangement can be reached, then the District shall:

   (a) arrange transportation immediately;

   (b) bring the matter to the attention of the State Coordinator for the Education of Homeless Children and Youth; and

   (c) ~~shall~~ ensure that such disputes do not interfere with the homeless child or youth attending school.

7. Records

An unaccompanied youth, as defined in section I.D., above, is entitled to knowledge of and access to all educational, medical, or similar records in the cumulative record of such unaccompanied youth maintained by this District.

ADMINISTRATIVE REGULATION
WINDSOR PUBLIC SCHOOLS
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8~~7~~. Contact Information

A. Local Contact: for further information, contact:

Steven Carvalho ~~**Jody Lefkowitz**~~
Director of Pupil and Special Education Services
860 687-2000 x 1238

B. State Contact: for further information or technical assistance, contact:

Louis Tallarita, State Coordinator
Connecticut Department of Education
~~25 Industrial Park Road~~
450 Columbus Boulevard
~~Middletown, CT 06457-1543~~Hartford, CT 06103
(860) 807-2058
Louis.Tallarita@ct.gov

Legal References:

State Law:

Public Act ~~17-194,~~19-179, An Act Concerning Homeless Students' Access to ~~Student Records for Certain Unaccompanied Youths~~Education

10-186 Duties of local and regional boards of education re school attendance. Hearings. Appeals to state board. Establishment of hearing board. Readmission. Transfers

10-253(e) School privileges for children in certain placements, non-resident children and children in temporary shelters

Federal Law:

The McKinney-Vento Homeless Education Assistance Act, 42 U.S.C. §§ 11431 et seq. , as amended by Every Student Succeeds Act, Pub. L. 114-95.

ADMINISTRATIVE REGULATION
WINDSOR PUBLIC SCHOOLS
WINDSOR, CT

Regulation Approved: October 1, 2010

Elizabeth E. Feser, Ed.D.
Superintendent of Schools

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COUNSELORS AT LAW

Rational for New Policy and Regulation:

P 5141.214 Policy and Regulation Concerning Sunscreen Application in School

We have added a new policy concerning sunscreen application in school, in accordance with Public Act 19-60. Students six (6) years of age and older may now self-apply sunscreen in school prior to outdoor activities, with the signed permission of the parent or guardian. This model policy also includes a sample permission form.

POLICY CONCERNING SUNSCREEN APPLICATION IN SCHOOL

The Windsor Board of Education (the "Board") permits the application of sunscreen by students within the Windsor Public Schools (the "District"), in accordance with State law. Specifically, notwithstanding the provisions of Connecticut General Statutes § 10-212a and the Board's policy and/or administrative regulations concerning the administration of medication in school, any student who is six (6) years of age or older may possess and self-apply an over-the-counter sunscreen product while in school prior to engaging in any outdoor activity.

For a student to apply sunscreen prior to engaging in any outdoor activity, the following elements must be met:

1. The student's parent or guardian must sign the Board's written authorization and submit the authorization to the school nurse; and

2. The student and the student's parent or guardian, where applicable, must comply with any individual school procedures concerning the possession and self-application of sunscreen in school.

The Board authorizes the Superintendent or his/her designee to develop administrative regulations to implement this policy.

Legal References:

Conn. Gen. Stat. § 10-212a Administration of medications in schools, at athletic events and to children in school readiness programs

Public Act 19-60, "An Act Allowing Students to Apply Sunscreen Prior to Engaging in Outdoor Activities"

ADOPTED: _____
REVISED: _____

ADMINISTRATIVE REGULATIONS CONCERNING SUNSCREEN APPLICATION IN SCHOOL

The Windsor Public Schools (the "District") permits the application of sunscreen by students within the District, in accordance with State law and Board of Education policy and administrative regulations. Specifically, notwithstanding the provisions of Connecticut General Statutes § 10-212a and the Board's policy and/or administrative regulations concerning the administration of medication in school, any student who is six (6) years of age or older may possess and self-apply an over-the-counter sunscreen product while in school prior to engaging in any outdoor activity.

A. For a student to apply sunscreen prior to engaging in any outdoor activity, the following elements must be met:

   1. The student's parent or guardian must sign the Board's written authorization and submit the authorization to the school nurse; and

   2. The student and the student's parent or guardian, where applicable, must comply with individual school procedures concerning the possession and self-application of sunscreen in school.

B. Individual schools shall develop processes and procedures for the self-application of over-the-counter sunscreen in school by students age six (6) and older prior to engaging in an outdoor activity, which processes and procedures must include that (a) the student's parent or guardian must sign the Board's written authorization and submit the authorization to the school nurse and (b) a student may only apply sunscreen that belongs to and has been brought into school by the individual student; and may include the following:

   1. The location for self-application of sunscreen.

   2. The time during the school day and in school of self-application.

   3. The labeling of the sunscreen.

Legal References:

Conn. Gen. Stat. § 10-212a	Administration of medications in schools, at athletic events and to children in school readiness programs

Public Act 19-60, "An Act Allowing Students to Apply Sunscreen Prior to Engaging in Outdoor Activities"

ADOPTED: _____

Windsor Board of Education

WRITTEN AUTHORIZATION FOR THE POSSESSION AND APPLICATION OF SUNSCREEN IN SCHOOL

Name of Child:_____ Date of Birth:_____

Address of Child: _____

Name of Parent(s):_____

Address of Parent(s):_____
(if different from child)

Connecticut law permits students six (6) years of age or older to possess and self-apply an over-the-counter sunscreen product while in school prior to engaging in any outdoor activity, with signed parent/guardian consent.

I, _____, the parent/guardian of _____,
Print name of parent/guardian Print name of student
permit my child to possess and self-apply an over-the-counter sunscreen product while in school prior to engaging in any outdoor activity. I understand and agree that the _____ Board of Education assumes no responsibility or liability whatsoever with regard to the possession or application of the over-the-counter sunscreen, including but not limited to whether, or the manner in which, the sunscreen is applied; the expiration of the sunscreen; and/or any reaction the student may have to the application of the sunscreen.

_____ _____
Signature of Parent/Guardian Date

Please return the completed original form to your child's school nurse.

F 5141.214

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Rational for Revised Policy:

P 5141.25 Management Plan and Guidelines for Students with Food Allergies, and/or Glycogen Storage Disease

This policy, which will be titled Management Plan and Guidelines for Students with Food Allergies and/or Glycogen Storage Disease and/or Diabetes, has been revised in accordance with feedback provided by the Office for Civil Rights. The revisions include adding students with diabetes to the protections provided to students with life-threatening food allergies and glycogen storage disease. The revisions also clarify that students with life-threatening food allergies and diabetes are virtually always students with disabilities and should be referred to a Section 504 team.

MANAGEMENT PLAN AND GUIDELINES FOR STUDENTS WITH FOOD ALLERGIES ~~AND/OR~~, GLYCOGEN STORAGE DISEASE AND/OR DIABETES

The Windsor Public Schools (the "~~District~~district") recognize that food allergies ~~and~~, glycogen storage disease ~~(GSD)~~and diabetes may be life threatening. For this reason, the ~~District~~district is committed to developing strategies and practices to minimize the risk of accidental exposure to life threatening food allergens and to ensure prompt and effective medical response should a student suffer an allergic reaction while at school. The ~~District~~district is also committed to appropriately managing and supporting students with ~~GSD~~glycogen storage disease and diabetes. The ~~District~~district further recognizes the importance of collaborating with parents, adult students (defined as students age eighteen (18) and older) and appropriate medical staff in developing such practices and encourages strategies to enable the student to become increasingly proactive in the care and management of his/her food allergy ~~and/or GSD~~, glycogen storage disease or diabetes, as developmentally appropriate. To this end, the ~~District adopts~~district adopt the following guidelines related to the management of life threatening food allergies, glycogen storage disease, and ~~GSD~~diabetes for students enrolled in ~~District~~district schools.

I. Identifying Students with Life-Threatening Food Allergies and/or Glycogen Storage Disease

Early identification of students with life-threatening food allergies, diabetes and/or glycogen storage disease (GSD) is important. The ~~District~~district therefore encourages parents/guardians of students and adult students with life-threatening food allergies to notify the school of the allergy, providing as much medical documentation about the extent and nature of the food allergy as is known, as well as any known effective treatment for the allergy. The ~~District~~district also encourages parents/guardians of students and adult students with GSD and diabetes to notify the school of the disease, providing as much medical documentation about the type of GSD or diabetes, nature of the disease, and current treatment of the student.

Students with life-threatening food allergies and diabetes are virtually always students with disabilities and should be referred to a Section 504 team, which will make a final determination concerning the student's eligibility for services under Section 504. The Section 504 team may determine that the only services needed are in the student's Individualized Health Care Plan (IHCP) and/or Emergency Care Plan (ECP); in that case, the IHCP and/or ECP will also serve as the student's Section 504 plan. The Section 504 team will also ensure that parents receive appropriate notice and are informed of their rights under Section 504, including their right to request an impartial hearing if they disagree with the provisions in the Section 504 plan.

Students with GSD and less severe food allergies should be referred to a Section 504 team if there is reason to believe that the student's GSD or food allergy substantially limits a major life activity. To determine whether a food allergy is severe enough to substantially limit a major life activity, the team should consider the impact on the student when the student has been exposed to the allergen and has not yet received treatment.

Major life activities include, but are not limited to:

(i) Caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working; and

(ii) The operation of a major bodily function, including functions of the immune system, special sense organs and skin; normal cell growth; and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

II. Individualized Health Care Plans and Emergency Care Plans

1. If the ~~District~~district obtains medical documentation that a student has a life-threatening food allergy ~~or~~, GSD, or diabetes, the ~~District~~district shall develop an ~~individualized health care plan~~ (IHCP) for the student. Each IHCP should contain information relevant to the student's participation in school activities~~, and should attempt to strike a balance between individual, school and community needs, while fostering normal development of the student.~~.

2. The IHCP ~~should~~shall be developed by a group of individuals, which shall include the parents, the adult student, if applicable, and appropriate school personnel. Such personnel may include, but are not limited to, the school nurse, school or food service administrator(s), classroom teacher(s) and the student, if appropriate. The school may also consult with the school's medical advisor, as needed.

3. IHCPs are developed for students with special health needs or whose health needs require daily interventions. The IHCP describes how to meet the student's health and safety needs within the school environment and should address the student's needs across school settings. Information to be contained in an IHCP should include a description of the functional health issues (diagnoses); student objectives for promoting self-care and age appropriate independence; and the responsibilities of parents, school nurse and other school personnel. The IHCP may also include strategies to minimize the allergic student's risk for exposure. For the student with ~~GSD~~life-threatening food allergies, GSD, or diabetes, the IHCP may include strategies designed to ameliorate risks associated with such disease and support the student's participation in the classroom. IHCPs for such students may include such considerations:

    a. classroom environment, including allergy free considerations, or allowing the student with GSD or diabetes to have food/dietary supplements when needed;
    b. cafeteria safety;
    c. participation in school nutrition programs;
    d. snacks, birthdays and other celebrations;
    e. alternatives to food rewards or incentives;
    f. hand-washing;
    g. location of emergency medication;
    h. who will provide emergency and routine care in school;
    i. risk management during lunch and recess times;
    j. special events;

k. field trips, fire drills and lockdowns;
l. extracurricular activities;
m. school transportation;
n. the provision of food or dietary supplements by the school nurse, or any school employee approved by the school nurse;
o. staff notification, including substitutes, and training; and
p. transitions to new classrooms, grades and/or buildings.

4. The IHCP should be reviewed annually, or whenever there is a change in the student's ~~emergency care plan~~ECP, changes in self-monitoring and self-care abilities of the student, or following an emergency event requiring the administration of medication or the implementation of other emergency protocols.

5. For a student with ~~GSD~~a life-threatening food allergy, GSD, or diabetes, the IHCP shall not prohibit a parent or guardian, or a person designated by such parent or guardian, to provide food or dietary supplements to a student with ~~GSD~~a life threatening food allergy, GSD, or diabetes on school grounds during the school day.

6. In addition to the IHCP, the ~~District~~district shall also develop an ~~Emergency Care Plan (~~ECP~~)~~ for each student identified as having a life -threatening food allergy. The ECP is part of the IHCP and describes the specific directions about what to do in a medical emergency. For the student with a life-threatening food allergy, the ECP should include the following information:

a. The student's name and other identifying information, such as date of birth, grade and photo;
b. The student's specific allergy;
c. The student's signs and symptoms of an allergic reaction;
d. The medication, if any, or other treatment to be administered in the event of exposure;
e. The location and storage of the medication;
f. Who will administer the medication (including self-administration options, as appropriate);
g. Other emergency procedures, such as calling 911, contacting the school nurse, and/or calling the parents or physician;
h. Recommendations for what to do if the student continues to experience symptoms after the administration of medication; and
i. Emergency contact information for the parents/family and medical provider.

7. In addition to the IHCP, the ~~District~~district shall also develop an ECP for each student identified as having GSD and/or diabetes. The ECP is part of the IHCP and describes the specific directions about what to do in a medical emergency. For the student with GSD or diabetes, the ECP should include the following information, as may be appropriate:

a. The student's name and other identifying information, such as date of birth, grade and photo;
b. Information about the disease or disease specific information (i.e. type of GSD or diabetes);

c. The student's signs and symptoms of an adverse reaction (such as hypoglycemia);
d. The medication, if any, or other treatment to be administered in the event of an adverse reaction or emergency (i.e. Glucagon or insulin)
e. The location and storage of the medication;
f. Who will administer the medication (including self-administration options, as appropriate);
g. Other emergency procedures, such as calling 911, contacting the school nurse, and/or calling the parents or physician;
h. Recommendations for what to do if the student continues to experience symptoms after the administration of medication; and
i. Emergency contact information for the parents/family and medical provider.

8. In developing the ECP, the school nurse should obtain current medical documentation from the parents/family and the student's health care provider, including the student's emergency plan and proper medication orders. If needed, the school nurse or other appropriate school personnel, should obtain consent to consult directly with the student's health care providers to clarify medical needs, emergency medical protocol and medication orders.

9. A student identified as having a life-threatening food allergy ~~or~~, GSD, or diabetes is entitled to an IHCP and an ECP, regardless of his/her status as a student with a disability, as that term is understood under Section 504 of the Rehabilitation Act of 1973 ("Section 504"), or the Individuals with Disabilities Education Act ("IDEA").

10. The ~~District~~district shall ensure that the information contained in the IHCP and ECP is distributed to any school personnel responsible for implementing any provisions of the IHCP and/or ECP, and that any procedures in the IHCP and/or ECP comply with the ~~District~~district's policies and procedures regarding the administration of medications to students.

~~11. Whenever appropriate, a student with a life-threatening food allergy and/or GSD should be referred to a Section 504 Team for consideration if/when there is reason to believe that the student has a physical or mental impairment that substantially limits one or more major life activities, as defined by Section 504. Whenever appropriate, students with life-threatening food allergies and/or GSD should be referred to a PPT for consideration of eligibility for special education and related services under the IDEA, if there is reason to suspect that the student has a qualifying disability and requires specialized instruction.~~

11. ~~12.~~ When making eligibility determinations under Section 504 and/or the IDEA, schools must consider the student's needs on an individualized, case-by-case basis.

III. Training/Education

1. The ~~District~~district shall provide appropriate education and training for school personnel regarding the management of students with life -threatening food allergies ~~and~~, GSD and diabetes. Such training may include an overview of life-

threatening food allergies ~~and~~, GSD and diabetes; prevention strategies; IHCPs and ECPs; and food safety and sanitation. Training shall also include, as appropriate for each school (and depending on the specific needs of the individual students at the school), training in the administration of medication with cartridge injectors (i.e. epi-pens), and/or the specific preventative strategies to minimize the risk of exposure to life-threatening allergens and prevent adverse reactions in students with GSD and diabetes (such as the provision of food or dietary supplements for students). School personnel will be also be educated on how to recognize symptoms of allergic reactions and/or symptoms of low blood sugar, as seen with GSD and diabetes, and what to do in the event of an emergency. Staff training and education will be coordinated by **[insert name of appropriate administrator/school nurse].** Any such training regarding the administration of medication shall be done accordance with state law and Board policy.

2. Each school within the ~~District~~district shall also provide age-appropriate information to students about food allergies ~~and~~, GSD and diabetes, how to recognize symptoms of an allergic reaction and/or low blood sugar emergency and the importance of adhering to the school's policies regarding food and/or snacks.

IV. Prevention

Each school within the ~~District~~district will develop appropriate practices to minimize the risk of exposure to life -threatening allergens ~~and~~, as well as the risks associated with GSD and diabetes. Practices that may be considered may include, but are not limited to:

1. Encouraging handwashing;
2. Discouraging students from swapping food at lunch or other snack/meal times;
3. Encouraging the use of non-food items as incentives, rewards or in connection with celebrations;
4. Training staff in recognizing symptoms of anaphylaxis and hypoglycemia; and
5. Planning for school emergencies, to include consideration of the need to access medication, food and/or dietary supplements.

V. Communication

1. As described above, the school nurse shall be responsible for coordinating the communication among parents, a student's individual health care provider and the school regarding a student's life -threatening allergic condition, GSD and/or ~~GSD~~diabetes. School staff responsible for implementing a student's IHCP will be notified of their responsibilities and provided with appropriate information as to how to minimize risk of exposure and/or alterations in blood sugar levels and how to respond in the event of such emergency.

2. Each school will ensure that there are appropriate communication systems available within each school (i.e. telephones, cell phones, walkie-talkies) and for off-site activities (i.e. field trips) to ensure that school personnel are able to effectively respond in case of emergency.

3. The ~~District~~district shall develop standard letters to be sent home to parents, whenever appropriate, to alert them to food restrictions within their student's classroom or school.

4. All ~~District~~district staff are expected to follow ~~District~~district policy and/or federal and state law regarding the confidentiality of student information, including medical information about the student.

5. The ~~District~~district shall make the Management Plan and Guidelines for Students with Food Allergies ~~and/or,~~ Glycogen Storage Disease and/or Diabetes available on the Board's website or the website of each school under the Board's jurisdiction.

6. The ~~District~~district shall provide annual notice to parents and guardians regarding the Management Plan and Guidelines for Students with Food Allergies ~~and/or,~~ Glycogen Storage Disease and/or Diabetes. Such notice shall be provided in conjunction with the annual written statement provided to parents and guardians regarding pesticide applications in the schools.

VI. Monitoring the District's Plan and Procedures

The ~~District~~district should conduct periodic assessments of its Management Plan and Guidelines for Students with Food Allergies ~~and/or,~~ Glycogen Storage Disease and/or Diabetes. Such assessments should occur at least annually and after each emergency event involving the administration of medication to a student with a life-threatening food allergy, GSD or ~~GSD~~diabetes to determine the effectiveness of the process, why the incident occurred, what worked and what did not work.

The Superintendent shall annually attest to the Department of Education that the District is implementing the Management Plan and Guidelines for Students with Food Allergies ~~and/or,~~ Glycogen Storage Disease and/or Diabetes.

Legal References:

State Law/Regulations/Guidance:

~~Public Act 18-185, An Act Concerning the Recommendations of the Task Force on Life-Threatening Food Allergies in Schools~~

Conn. Gen. Stat. § 10-212a	Administration of Medications in Schools
Conn. Gen. Stat. § 10-212c	Life-threatening food allergies and Glycogen Storage Disease: Guidelines; ~~District~~district plans
Conn. Gen. Stat. § 10-220i	Transportation of students carrying cartridge injectors
Conn. Gen. Stat. § 10-231c	Pesticide applications at schools without an integrated pest management plan.
Conn. Gen. Stat. § 19a-900	Use of cartridge injectors by staff members of before or after school program, day camp or day care facility.
Conn. Gen. Stat. § 52-557b	"Good Samaritan law~~.~~". Immunity from liability for emergency, medical assistance, first aid or medication by injector. School personnel not required to administer or render. Immunity from liability re automatic external defibrillators.
Regs. Conn. State Agencies § 10-212a-1 through 10-212a-7	Administration of Medication by School Personnel

Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools (Includes Guidelines for Managing Glycogen Storage Disease), Connecticut State Department of Education (Updated 2012).

Federal Law:
Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794
Individuals with Disabilities Education Act, 20 U.S.C. § 1400 et seq.
The Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. § 12101 et seq.

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Windsor Public Schools
Windsor, CT

SHIPMAN & GOODWIN LLP
COUNSELORS AT LAW

Rational for Revised Policy:

P 5141.4 Reports of Suspected Abuse or Neglect of Children or Sexual Assault of Students by School Employees

We have revised the Child Abuse, Neglect and Sexual Assault Reporting policy for organizational clarity. We have also updated various operational definitions of abuse and neglect in the appendices of the policy.

We have revised the policy concerning Child Abuse, Neglect and Sexual Assault Reporting in accordance with Public Acts 18-17 and 18-67. Public Act 18-17 adds licensed behavior therapists to the list of mandatory reporters. Public Act 18-67 provides for the electronic filing of reports to the Department of Children and Families which were effective October 2019. In any event, the new statutory language provides that reports may be filed electronically or orally/in writing. In addition, the policy has been revised for organizational clarity as well as various operational definitions of abuse and neglect in the appendices of the policy.

REPORTS OF SUSPECTED ABUSE OR NEGLECT OF CHILDREN OR SEXUAL ASSAULT OF STUDENTS BY SCHOOL EMPLOYEES

Connecticut General Statute § 17a-101 et seq. requires school employees who have reasonable cause to suspect or believe (1) that a 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.

In furtherance of this statute and its purpose, it is the policy of the Windsor Board of Education ("Board") to require ALL EMPLOYEES of the Windsor Board of Education to report suspected abuse and/or neglect, nonaccidental physical injury, imminent risk of serious harm or sexual assault of a student by a school employee, in accordance with the procedures set forth below.

1. Scope of Policy

   This policy applies not only to school employees who are required by law to report suspected child abuse and/or neglect, nonaccidental physical injury, imminent risk of serious harm or sexual assault of a student by a school employee, but to ALL EMPLOYEES of the Windsor Board of Education.

2. Definitions

   For the purposes of this policy:

   "Abused" means that a child (a) has had physical injury or injuries inflicted upon him or her other than by accidental means, or (b) has injuries which are at variance with the history given of them, or (c) is in a condition which is the result of maltreatment, such as, but not limited to, malnutrition, sexual molestation or exploitation, deprivation of necessities, emotional maltreatment or cruel punishment.

   "Neglected" means that a child (a) has been abandoned, or (b) is being denied proper care and attention, physically, educationally, emotionally or morally, or (c) is being permitted to live under conditions, circumstances or associations injurious to his well-being, or (d) has been abused.

   "School employee" means (~~A~~a) a teacher, substitute teacher, school administrator, school superintendent, guidance counselor, school counselor, psychologist, social worker, nurse, physician, school paraprofessional or coach employed by the

Board or who is working in a Board elementary, middle or high school; or (~~B~~b) any other person who, in the performance of his or her duties, has regular contact with students and who provides services to or on behalf of students enrolled in the Windsor Public Schools ("District"),, pursuant to a contract with the Board.

"Sexual assault" means, for the purposed of the mandatory reporting laws and this policy, a violation of Sections 53a-70, 53a-70a, 53a-71, 53a-72a, 53a-72b or 53a-73a of the Connecticut General Statutes. Please see Appendix A of this policy for the relevant statutory definitions of sexual assault laws, and related terms covered by the mandatory reporting laws and this policy.

"Statutory mandated reporter" means an individual required by Conn. Gen. Stat. Section 17a-101 et seq. to report suspected abuse and/or neglect of children or the sexual assault of a student by a school employee. The term "statutory mandated reporter" includes all school employees, as defined above, any person who is a licensed behavior analyst, and any person who holds or is issued a coaching permit by the State Board of Education, is a coach of intramural or interscholastic athletics, and is eighteen years of age or older.

3. What Must Be Reported

a) A report must be made when any employee of the Board of Education in the ordinary course of such person's employment or profession has reasonable cause to suspect or believe that any child under the age of eighteen years:

   a) has been abused or neglected;

   b) has had nonaccidental physical injury, or injury which is at variance with the history given for such injury, inflicted upon him/her; ~~or~~

   c) is placed at imminent risk of serious harm; or

b) A report must be made when any employee of the Board of Education in the ordinary course of such person's employment or profession has reasonable cause to suspect or believe that any person, regardless of age, 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 the following sexual assault crimes, and the perpetrator is a school employee:

   i) sexual assault in first degree;

   ii) aggravated sexual assault in the first degree;

   iii) sexual assault in the second degree;

   iv) sexual assault in the third degree;

v) sexual assault in the third degree with a firearm; or
vi) sexual assault in the fourth degree.

Please see Appendix A of this policy for the relevant statutory definitions of sexual assault laws and related terms covered by the mandatory reporting laws and this policy.

c) The suspicion or belief of a Board employee may be based on factors including, but not limited to, observations, allegations, facts or statements by a child or victim, as described above, or a third party. Such suspicion or elieft does not require certainty or probable cause.

4. Reporting Procedures for Statutory Mandated Reporters

The following procedures apply only to statutory mandated reporters, as defined above.

When an employee of the Windsor Board of Education who is a statutory mandated reporter and who, in the ordinary course of the person's employment, has reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm, or is the victim of sexual assault by a school employee, as described in Paragraph 3, above, the following steps shall be taken.

(1) The employee shall make an oral or electronic report as soon as practicable, but not later than twelve (12) hours after having reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm, or is a victim of sexual assault by a school employee

~~Such~~

(a) An oral report shall be made by telephone or in person to the Commissioner of the Department of Children and Families ("DCF") or the local law enforcement agency. ~~The Department of Children and Families~~DCF established a 24 hour Child Abuse and Neglect ~~Hotline~~Careline at 1-800-842-2288 for the purpose of making such oral reports.Careline at 1-800-842-2288 for the purpose of making such oral reports.

(b) An electronic report shall be made in the manner prescribed by the Commissioner of DCF. An employee making an electronic report shall respond to further inquiries from the Commissioner of DCF or designee made within twenty-four (24) hours. Such employee shall inform the Superintendent or his/her designee as soon as possible as to the nature of the further communication with the Commissioner or designee.

(2) The employee shall also make an oral report as soon as practicable to the Building Principal or his/her designee, and/or the Superintendent or his/ ~~or~~ her designee. If the Building Principal is the alleged perpetrator of the abuse/neglect or sexual assault of a student, then the employee shall notify the Superintendent his/her designee directly.

(3) In cases involving suspected or believed abuse, neglect or sexual assault of a student by a school employee, the Superintendent or his/her designee shall immediately notify the child's parent or guardian that such a report has been made.

(4) Not later than forty-eight (48) hours after making an oral report, the employee shall submit a written or electronic report to the Commissioner of ~~Children and Families~~DCF or the Commissioner's designee containing all of the required information. The written or electronic report should be submitted ~~on the DCF-136 form or any other form designated for that purpose.~~in the manner prescribed by the Commissioner of DCF. When such report is submitted electronically, the employee shall respond to further inquiries from the Commissioner of DCF or designee made within twenty-four (24) hours. Such employee shall inform the Superintendent or his/her designee as soon as possible as to the nature of the further communication with the Commissioner or designee.

(5) The employee shall immediately submit a copy of the written or electronic report to the Building Principal or his/her designee and to the Superintendent or the Superintendent's designee.

(6) If the report concerns suspected abuse, neglect or sexual assault of a student by a school employee holding a certificate, authorization or permit issued by the State Department of Education, the Commissioner of ~~Children and Families~~DCF (or his/her designee) shall submit a copy of the written or electronic report to the Commissioner of Education (or his/her designee).

5. Reporting Procedures for Employees Other Than Statutory Mandated Reporters

The following procedures apply only to employees who are not statutory mandated reporters, as defined above.

a) When an employee who is not a statutory mandated reporter and who, in the ordinary course of the person's employment or profession, has reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm, or is a victim of sexual assault by a school employee, as described in Paragraph 3, above, the following steps shall be taken.

(1) The employee shall make an oral report as soon as practicable, but not later than twelve (12) hours after the employee has reasonable cause to suspect or believe that a child has been abused or neglected, placed at imminent risk of serious harm or is a victim of sexual assault by a school employee. Such oral report shall be made by telephone or in person to the Superintendent of Schools or his/her designee, to be followed by an immediate written report to the Superintendent or his/her designee.

(2) If the Superintendent or his/her designee determines that there is reasonable cause to suspect or believe that a child has been abused or neglected or placed at imminent risk of serious harm or is a victim of sexual assault by school employee, he/she shall cause reports to be made in accordance with the procedures set forth for statutory mandated reporters.

b) Nothing in this policy shall be construed to preclude an employee reporting suspected child abuse, neglect or sexual assault by a school employee from reporting the same directly to the Commissioner of ~~Children and Families~~DCF.

6. Contents of Reports

Any ~~oral or written~~ report made pursuant to this policy shall contain the following information, if known:

a) The names and addresses of the child and his/her parents or other person responsible for his/her care;

b) the age of the child;

c) the gender of the child;

d) the nature and extent of the child's injury or injuries, maltreatment or neglect;

e) the approximate date and time the injury or injuries, maltreatment or neglect occurred;

f) information concerning any previous injury or injuries to, or maltreatment or neglect of the child or his/her siblings;

g) the circumstances in which the injury or injuries, maltreatment or neglect came to be known to the reporter;

h) the name of the person or persons suspected to be responsible for causing such injury or injuries, maltreatment or neglect;

i) the reasons such person or persons are suspected of causing such injury or injuries, maltreatment or neglect;

j) any information concerning any prior cases in which such person or persons have been suspected of causing an injury, maltreatment or neglect of a child; and

k) whatever action, if any, was taken to treat, provide shelter or otherwise assist the child.

*For purposes of this Paragraph, the term "child" includes any victim of sexual assault by a school employee, as described in Paragraph 3, above.

7. Investigation of the Report

a) The Superintendent or his/her designee shall thoroughly investigate reports of suspected abuse, neglect or sexual assault if/when such report involves an employee of the Board of Education or other individual under the control of the Board, provided ~~such investigation does not impede an investigation by the Department of Children and Families ("DCF")~~the procedures in subparagraph (b), below are followed. In all other cases, DCF shall be responsible for conducting the investigation with the cooperation and collaboration of the Board, as appropriate.

b) Recognizing that DCF is the lead agency for the investigation of child abuse and neglect reports and reports of a student's sexual assault by school employees, the Superintendent's investigation shall permit and give priority to any investigation conducted by the Commissioner of ~~Children and Families~~DCF or the appropriate local law enforcement agency. The Superintendent shall conduct the ~~district~~District's investigation and take any disciplinary action, consistent with state law, upon notice from the Commissioner of ~~Children and Families~~DCF or the appropriate local law enforcement agency that the ~~district~~District's investigation will not interfere with the investigation of the Commissioner of ~~Children and Families~~DCF or the local law enforcement agency.

c) The Superintendent shall coordinate investigatory activities in order to minimize the number of interviews of any child or student victim of sexual assault and share information with other persons authorized to conduct an investigation of child abuse or neglect, as appropriate.

d) Any person reporting child abuse or neglect or the sexual assault of a student by a school employee, or having any information relevant to alleged abuse or neglect or of the sexual assault of a student by a school employee, shall provide the Superintendent with all information related to the investigation that is in the possession or control of such person, except as expressly prohibited by state or federal law.

e) When the school district is conducting an investigation involving suspected abuse or neglect or sexual assault of a student by an employee of the Board or other individual under the control of the Board, the Superintendent's investigation shall include an opportunity for the individual suspected of abuse, neglect or sexual assault to be heard with respect to the allegations contained within the report. During the course of such investigation, the Superintendent may suspend a Board employee with pay or may place the employee on administrative leave with pay, pending the outcome of the investigation. If the individual is one who provides services to or on behalf of students enrolled in the ~~Windsor Public Schools~~District, pursuant to a contract with the Board of Education, the Superintendent may suspend the provision of such services, and direct the individual to refrain from any contact with students enrolled in the ~~Windsor Public Schools~~District, pending the outcome of the investigation.

8. Evidence of Abuse, Neglect or Sexual Assault by a School Employee

a) If, upon completion of the investigation by the Commissioner of ~~Children and Families~~DCF ("Commissioner"), the Superintendent has received a report from the Commissioner that he or she has reasonable cause to believe that (1) a child has been abused or neglected by a school employee, as defined above, and the Commissioner has recommended that such employee be placed on the ~~Department of Children and Families~~DCF child abuse and neglect registry, or (2) a student is a victim of sexual assault by a school employee, the Superintendent shall request (and the law provides) that DCF notify the Superintendent not later than five (5) working days after such finding, and provide the Superintendent with records, whether or not created by DCF, concerning such investigation. The Superintendent shall suspend such school employee. Such suspension shall be with pay and shall not result in the diminution or termination of benefits to such employee.

b) Not later than seventy-two (72) hours after such suspension, the Superintendent shall notify the Board of Education and the Commissioner of Education, or the Commissioner of Education's representative, of the reasons for and the conditions of the suspension. The Superintendent shall disclose such records to the Commissioner of Education and the Board of Education or its attorney for purposes of review of employment status or the status of such employee's certificate, permit or authorization, if any.

c) The suspension of a school employee employed in a position requiring a certificate shall remain in effect until the Superintendent and/or Board of Education acts pursuant to the provisions of Conn. Gen. Stat. §10-151. If the contract of employment of such certified school employee is terminated, or such certified school employee resigns such employment, the Superintendent shall notify the Commissioner of Education, or the Commissioner of Education's representative, within seventy-two (72) hours after such termination or resignation.

d) The suspension of a school employee employed in a position requiring an authorization or permit shall remain in effect until the Superintendent and/or Board of Education acts pursuant to any applicable termination provisions. If the contract of employment of a school employee holding an authorization or permit from the State Department of Education is terminated, or such school employee resigns such employment, the Superintendent shall notify the Commissioner of Education, or the Commissioner of Education's representative, within seventy-two hours after such termination or resignation.

e) Regardless of the outcome of any investigation by the Commissioner of ~~Children and Families~~DCF and/or the police, the Superintendent and/or the Board, as appropriate, may take disciplinary action, up to and including termination of employment, in accordance with the provisions of any applicable statute, if the Superintendent's investigation produces evidence that a child has been abused or neglected by a school employee or that a student has been victim of sexual assault by a school employee.

f) The ~~Windsor Public Schools~~District shall not employ a person whose employment contract is terminated or who resigned from employment following a suspension pursuant to Paragraph 8(a) of this policy and Conn. Gen. Stat. § 17a-101i, if such person is convicted of a crime involving an act of child abuse or neglect or an act of sexual assault of a student, as described in Paragraph ~~3~~2 of this policy..

9. Evidence of Abuse, Neglect or Sexual Assault by An Independent Contractor of the Board of Education

If the investigation by the Superintendent and/or the Commissioner of ~~Children and Families~~DCF produces evidence that a child has been abused or neglected, or a student has been sexually assaulted, by any individual who provides services to or on behalf of students enrolled in the ~~Windsor Public Schools~~District, pursuant to a contract with the Board ~~of Education~~, the Superintendent shall permanently suspend the provision of such services, and direct the individual to refrain from any contact with students enrolled in the ~~Windsor Public Schools~~District.

10. Delegation of Authority by Superintendent

The Superintendent may appoint a designee for the purposes of receiving and making reports, notifying and receiving notification, or investigating reports pursuant to this policy.

11. Confidential Rapid Response Team

~~No later than January 1, 2016, the~~The Superintendent shall establish a confidential rapid response team to coordinate with DCF to (1) ensure prompt reporting of suspected abuse or neglect or sexual assault of a student by a school employee, as described in Paragraph 3, above, and (2) provide immediate access to information and individuals relevant to the department's investigation. The

confidential rapid response team shall consist of a teacher and the Superintendent, a local police officer and any other person the Board of Education, acting through its Superintendent, deems appropriate.

12. Disciplinary Action for Failure to Follow Policy

Except as provided in Section 12 below, any employee who fails to comply with the requirements of this policy shall be subject to discipline, up to and including termination of employment.

13. The ~~Windsor Public Schools~~District shall not hire any person whose employment contract was previously terminated by a board of education or who resigned from such employment, if such person has been convicted of a violation of Section 17a-101a of the Connecticut General Statutes, as amended, relating to mandatory reporting, ~~regardless of whether~~when an allegation of abuse or neglect or sexual assault ~~was~~has been substantiated.

14. Non-Discrimination Policy/Prohibition Against Retaliation

The Board of Education expressly prohibits retaliation against individuals reporting child abuse or neglect or the sexual assault of a student by a school employee and shall not discharge or in any manner discriminate or retaliate against any employee who, in good faith makes, makes~~, or in good faith does not make,~~, a report pursuant to this policy, or testifies or is about to testify in any proceeding involving abuse or neglect or sexual assault by a school employee. The Board of Education also prohibits any employee from hindering or preventing or attempting to hinder or prevent any employee from making a report pursuant to this policy or state law concerning suspected child abuse or neglect or the sexual assault of a student by a school employee or testifying in any proceeding involving child abuse or neglect or the sexual assault of a student by a school employee.

15. Distribution of Policy and Posting of Careline Information

This policy shall be distributed annually to all school employees employed by the Board. The Board shall document that all such school employees have received this written policy and completed the training and refresher training programs required by in Section 14, below. The Board shall post the Internet web site address and telephone number for the DCF Child Abuse and Neglect Careline in a conspicuous location frequented by students in each school under the jurisdiction of the Board.

16. Training

a) All school employees, as defined above, shall be required to complete an educational training program for the accurate and prompt identification and reporting of child abuse and neglect. Such training program shall be developed and approved by the Commissioner of ~~Children and Families~~DCF.

b) All school employees, as defined above, shall shall ~~retake~~take a a refresher training course developed and approved by the Commissioner of ~~Children and Families~~DCF. at least once every three years.

c) The principal for each school shall annually certify to the Superintendent that each school employee, as defined above, working at such school, is in compliance with the training provisions in this policy and as required by state law. The Superintendent shall certify such compliance to the State Board of Education.

17. Records

a) The Board shall maintain in a central location all records of allegations, investigations and reports that a child has been abused or neglected by a school employee employed by the Board or that a student has been a victim of sexual assault by a school employee employed by the Board, as defined above, and conducted in accordance with this policy. Such records shall include any reports made to the ~~Department of Children and Families~~DCF. The State Department of Education shall have access to such records upon request.

b) Notwithstanding the provisions of Conn. Gen. Stat. §10-151c, the Board shall provide the Commissioner of ~~Children and Families~~DCF, upon request and for the purposes of an investigation by the Commissioner of ~~Children and Families~~DCF of suspected child abuse or neglect by a teacher employed by the Board, any records maintained or kept on file by the Board. Such records shall include, but not be limited to, supervisory records, reports of competence, personal character and efficiency maintained in such teacher's personnel file with reference to evaluation of performance as a professional employee of the Board, and records of the personal misconduct of such teacher. For purposes of this section, "teacher" includes each certified professional employee below the rank of superintendent employed by the Board in a position requiring a certificate issued by the State Board of Education.

18. Child Sexual Abuse and/or Sexual Assault Response Policy and Reporting Procedure

The Board has adopted a uniform child sexual abuse and/or sexual assault response policy and reporting procedure in connection with the implementation of its sexual assault and abuse prevention and awareness program, as outlined in Board Policy [#],**Child Sexual Abuse and/or Sexual Assault Response**

Policy and Reporting Procedure. Upon receipt of any report of child sexual abuse and/or sexual assault from any source, a school employee shall report such suspicion to the Safe School Climate Coordinator in addition to complying with his/her obligations under this Policy and the law regarding mandatory reporting of abuse, neglect and sexual assault.

Legal References: Connecticut General Statutes:

Section 10-151

Section 10-221s

Section 17a-101 et seq.

Section 17a-101q, Statewide Sexual Abuse and Assault Awareness and Prevention Program

Section 17a-103

Section 46b-120

Section 53a-65

~~Public Act 16-67, "An Act Concerning the Disclosure of Certain Education Personnel Records, Criminal Penalties for Threatening in Educational Settings and the Exclusion of a Minor's Name from Summary Process Complaints"~~

Policy Revised: September 20, 2016
Policy Revised: March 17, 2015
Policy Adopted: June 19, 2012

Windsor Public Schools
Windsor, CT

Appendix A

RELEVANT EXCERPTS OF STATUTORY DEFINITIONS
OF SEXUAL ASSAULT AND RELATED TERMS COVERED BY MANDATATORY
REPORTING LAWS AND THIS POLICY

An employee of the Board of Education must make a report in accordance with this policy when the employee of the Board of Education in the ordinary course of such person's employment or profession has reasonable cause to suspect or believe that any person, regardless of age, 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 the following sexual assault crimes, and the perpetrator is a school employee. The following are relevant excerpts of the sexual assault laws and related terms covered by mandatory reporting laws and this policy.

"Intimate Parts" (Conn. Gen. Stat. § 53a-65)

"Intimate parts" means the genital area or any substance emitted therefrom, groin, anus or any substance emitted therefrom, inner thighs, buttocks or breasts.

"Sexual Intercourse" (Conn. Gen. Stat. § 53a-65)

"Sexual intercourse" means vaginal intercourse, anal intercourse, fellatio or cunnilingus between persons regardless of sex. Its meaning is limited to persons not married to each other. Penetration, however slight, is sufficient to complete vaginal intercourse, anal intercourse or fellatio and does not require emission of semen. Penetration may be committed by an object manipulated by the actor into the genital or anal opening of the victim's body.

"Sexual Contact" (Conn. Gen. Stat. § 53a-65)

"Sexual contact" means any contact with the intimate parts of a person not married to the actor for the purpose of sexual gratification of the actor or for the purpose of degrading or humiliating such person or any contact of the intimate parts of the actor with a person not married to the actor for the purpose of sexual gratification of the actor or for the purpose of degrading or humiliating such person.

Sexual Assault in First Degree (Conn. Gen. Stat. § 53a-70)

A person is guilty of sexual assault in the first degree when such person (1) compels another person to engage in sexual intercourse by the use of force against such other person or a third person, or by the threat of use of force against such other person or against a third person which reasonably causes such person to fear physical injury to such person or a third person, or (2) engages in sexual intercourse with another person and such other person is under thirteen years of age and the actor is more than two years older than such person, or (3) commits sexual assault in the second degree as provided in section 53a-71 and in the commission of such offense is aided by two or more other persons actually present, or (4) engages in sexual intercourse with another person and

such other person is mentally incapacitated to the extent that such other person is unable to consent to such sexual intercourse.

Aggravated Sexual Assault in the First Degree (Conn. Gen. Stat. § 53a-70a)

A person is guilty of aggravated sexual assault in the first degree when such person commits sexual assault in the first degree as provided in section 53a-70 and in the commission of such offense (1) such person uses or is armed with and threatens the use of or displays or represents by such person's words or conduct that such person possesses a deadly weapon, (2) with intent to disfigure the victim seriously and permanently, or to destroy, amputate or disable permanently a member or organ of the victim's body, such person causes such injury to such victim, (3) under circumstances evincing an extreme indifference to human life such person recklessly engages in conduct which creates a risk of death to the victim, and thereby causes serious physical injury to such victim, or (4) such person is aided by two or more other persons actually present. No person shall be convicted of sexual assault in the first degree and aggravated sexual assault in the first degree upon the same transaction but such person may be charged and prosecuted for both such offenses upon the same information.

Sexual Assault in the Second Degree (Conn. Gen. Stat. § 53a-71)

A person is guilty of sexual assault in the second degree when such person engages in sexual intercourse with another person and: (1) Such other person is thirteen years of age or older but under sixteen years of age and the actor is more than three years older than such other person; or (2) such other person is impaired because of mental disability or disease to the extent that such other person is unable to consent to such sexual intercourse; or (3) such other person is physically helpless; or (4) such other person is less than eighteen years old and the actor is such person's guardian or otherwise responsible for the general supervision of such person's welfare; or (5) such other person is in custody of law or detained in a hospital or other institution and the actor has supervisory or disciplinary authority over such other person; or (6) the actor is a psychotherapist and such other person is (A) a patient of the actor and the sexual intercourse occurs during the psychotherapy session, (B) a patient or former patient of the actor and such patient or former patient is emotionally dependent upon the actor, or (C) a patient or former patient of the actor and the sexual intercourse occurs by means of therapeutic deception; or (7) the actor accomplishes the sexual intercourse by means of false representation that the sexual intercourse is for a bona fide medical purpose by a health care professional; or (8) the actor is a school employee and such other person is a student enrolled in a school in which the actor works or a school under the jurisdiction of the local or regional board of education which employs the actor; or (9) the actor is a coach in an athletic activity or a person who provides intensive, ongoing instruction and such other person is a recipient of coaching or instruction from the actor and (A) is a secondary school student and receives such coaching or instruction in a secondary school setting, or (B) is under eighteen years of age; or (10) the actor is twenty years of age or older and stands in a position of power, authority or supervision over such other person by virtue of the actor's professional, legal, occupational or volunteer status and such other person's participation in a program or activity, and such other person is under eighteen years of age; or (11) such other person is placed or receiving services under the direction

of the Commissioner of Developmental Services in any public or private facility or program and the actor has supervisory or disciplinary authority over such other person.

Sexual Assault in the Third Degree (Conn. Gen. Stat. § 53a-72a)

A person is guilty of sexual assault in the third degree when such person (1) compels another person to submit to sexual contact (A) by the use of force against such other person or a third person, or (B) by the threat of use of force against such other person or against a third person, which reasonably causes such other person to fear physical injury to himself or herself or a third person, or (2) engages in sexual intercourse with another person whom the actor knows to be related to him or her within any of the degrees of kindred specified in section 46b-21.

Sexual Assault in the Third Degree with a Firearm (Conn. Gen. Stat. § 53a-72b)
A person is guilty of sexual assault in the third degree with a firearm when such person commits sexual assault in the third degree as provided in section 53a-72a, and in the commission of such offense, such person uses or is armed with and threatens the use of or displays or represents by such person's words or conduct that such person possesses a pistol, revolver, machine gun, rifle, shotgun or other firearm. No person shall be convicted of sexual assault in the third degree and sexual assault in the third degree with a firearm upon the same transaction but such person may be charged and prosecuted for both such offenses upon the same information.

Sexual Assault in the Fourth Degree (Conn. Gen. Stat. § 53a-73a)

A person is guilty of sexual assault in the fourth degree when: (1) Such person subjects another person to sexual contact who is (A) under thirteen years of age and the actor is more than two years older than such other person, or (B) thirteen years of age or older but under fifteen years of age and the actor is more than three years older than such other person, or (C) mentally incapacitated or impaired because of mental disability or disease to the extent that such other person is unable to consent to such sexual contact, or (D) physically helpless, or (E) less than eighteen years old and the actor is such other person's guardian or otherwise responsible for the general supervision of such other person's welfare, or (F) in custody of law or detained in a hospital or other institution and the actor has supervisory or disciplinary authority over such other person; or (2) such person subjects another person to sexual contact without such other person's consent; or (3) such person engages in sexual contact with an animal or dead body; or (4) such person is a psychotherapist and subjects another person to sexual contact who is (A) a patient of the actor and the sexual contact occurs during the psychotherapy session, or (B) a patient or former patient of the actor and such patient or former patient is emotionally dependent upon the actor, or (C) a patient or former patient of the actor and the sexual contact occurs by means of therapeutic deception; or (5) such person subjects another person to sexual contact and accomplishes the sexual contact by means of false representation that the sexual contact is for a bona fide medical purpose by a health care professional; or (6) such person is a school employee and subjects another person to sexual contact who is a student enrolled in a school in which the actor works or a school under the jurisdiction of the local or regional board of education which employs the actor; or (7) such person is a coach in an athletic activity or a person who provides intensive, ongoing instruction and

subjects another person to sexual contact who is a recipient of coaching or instruction from the actor and (A) is a secondary school student and receives such coaching or instruction in a secondary school setting, or (B) is under eighteen years of age; or (8) such person subjects another person to sexual contact and (A) the actor is twenty years of age or older and stands in a position of power, authority or supervision over such other person by virtue of the actor's professional, legal, occupational or volunteer status and such other person's participation in a program or activity, and (B) such other person is under eighteen years of age; or (9) such person subjects another person to sexual contact who is placed or receiving services under the direction of the Commissioner of Developmental Services in any public or private facility or program and the actor has supervisory or disciplinary authority over such other person.

SHIPMAN & GOODWIN LLP
COUNSELORS AT LAW

Rational for Revised Policy:

P 5144.1 Physical Activity and Student Discipline

This policy was revised based on Public Act 19-173 to include provisions related to the devotion of time to undirected play for elementary students in addition to the twenty minutes of required time for physical exercise. The policy also addresses the prevention of students from participating in the entire time devoted to physical exercise and undirected play as a form of discipline. The new policy will be called *Physical Activity, Undirected Play and Student Discipline.*

PHYSICAL ACTIVITY, UNDIRECTED PLAY AND STUDENT DISCIPLINE

It is the policy of the Board to promote the health and well-being of district students by encouraging healthy lifestyles including promoting physical exercise and activity as part of the school day.

Prohibition on Deprivation of Physical Exercise Period or Undirected Play Period as a Form of Discipline:

For elementary school students, the Board includes a time of not less than twenty (20) minutes in total, during the regular school day, to be devoted to physical exercise, **except** that a planning and placement team ("PPT") may develop a different schedule for students requiring special education and related services. ~~**The Board prohibits school employees from disciplining elementary school students by preventing them from participating in the entire time devoted to physical exercise during the regular school day. This policy does not prevent a student from being disciplined or being sent to the office during the physical activity.**~~

The administration may include additional time, beyond the twenty minutes required for physical exercise, devoted to undirected play during the regular school day for elementary school students.

In an effort to promote physical exercise and undirected play, the Board prohibits school employees from disciplining elementary school students by preventing them from participating in the full 20 minutes of time devoted to physical exercise or additional time devoted to undirected play during the regular school day, except in instances where the student's behavior poses a health and/or safety concern or as determined by a student's Section 504 or planning and placement team.

Prohibition on Compulsion of Physical Activity as a Form of Discipline:

For all students, the Board prohibits school employees from disciplining students by requiring students to engage in physical activity as a form of discipline during the regular school day.

Definition:

For the purposes of this policy, a "school employee" is defined as (1) a teacher, substitute teacher, school administrator, school superintendent, guidance counselor, school counselor, psychologist, social worker, nurse, physician, school paraprofessional or coach employed by the Board or working in the district schools, or (2) any other individual who, in the performance of his or her duties, has regular contact with students and who provides services to or on behalf of students enrolled in the district schools pursuant to a contract with the Board.

Disciplinary Action for Failure to Follow Policy:

Any employee who fails to comply with the requirements of this policy may be subject to discipline, up to and including termination of employment. Any contracted individual who provides services to or on behalf of students enrolled in the district and who fails to comply with the requirements of this policy may be subject to having his/her contract for services suspended by the district.

Legal References:

Connecticut General Statutes:

Public Act 19-173. An Act Concerning the Inclusion of Additional Time Devoted to Undirected Play to the Regular School Day.

§ 10-221o Lunch periods. Recess. **Boards to adopt policies addressing the limitations of physical exercise**
~~**Public Act 13-173, "An Act Concerning Childhood Obesity and Physical Exercise in the Schools"**~~

§ 10-221u Boards to adopt policies addressing the use of physical activity as discipline

ADOPTED: 3/18/14

Windsor Public Schools
Windsor, CT



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Rational for Revised Policy and Regulation:

P/AR 5145 Policy Regarding Students and Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990

The complaint procedures in this policy's administrative regulation have been updated in accordance with feedback provided by the Office for Civil Rights.

POLICY REGARDING STUDENTS AND SECTION 504 OF THE REHABILITATION ACT OF 1973 AND TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990

Section 504 of the Rehabilitation Act of 1973 ("Section 504") prohibits discrimination against individuals with a disability in any program receiving Federal financial assistance. Similarly, Title II of the Americans with Disabilities Act of 1990 ("Title II" or "ADA") prohibits discrimination against individuals with a disability by state and local governments. To be protected under Section 504 and the ADA ("collectively, "Section 504/ADA"), an individual must (1) have a physical or mental impairment that substantially limits one or more major life activities; (2) have a record of such an impairment; or (3) be regarded as having such an impairment.

In order to fulfill its obligation under Section 504/ADA, the Windsor Public Schools recognize a responsibility to avoid discrimination in policies and practices regarding its personnel, students, parents/guardians and members of the public who participate in school sponsored programs. In this regard, the Windsor Public Schools prohibit discrimination against any person with a disability in any of the services, programs or activities of the school system.

The school district has specific responsibilities under Section 504 to identify, evaluate and provide an educational placement for students who have a physical or mental impairment that substantially limits a major life activity. The school district's obligation includes providing access to a free appropriate public education ("FAPE") for students determined to be eligible under Section 504/ADA. Under Section 504, FAPE is defined as the provision of regular or special education and related services that are designed to meet the individual educational needs of a student with a disability as adequately as the needs of students without disabilities are met, and that are provided without cost (except for fees imposed on nondisabled students/parents).

If the parent/guardian of a student disagrees with the decisions made by the professional staff of the school district with respect to the identification, evaluation or educational placement of his/her child, the parent/guardian has a right to request an impartial due process hearing.

In addition, a student or parent/guardian of a student may also file an internal grievance/complaint on these issues or any other type of discrimination on the basis of disability by or within the district by utilizing the grievance/complaint procedures outlined in the Board's Administrative Regulations Regarding Students and Section 504 of Rehabilitation Act of 1973 and Title II of Americans with Disabilities Act, and/or may file a complaint with the Office for Civil Rights, U.S. Department of Education ("OCR"):

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

Anyone who wishes to file a grievance/complaint with the district, or who has questions or concerns about this policy, should contact **Steven Carvalho, Director of Pupil and Special Education Services, the Section 504/ADA Coordinator for the Windsor Public Schools, at phone number 860-687-2000 x 1238.**

The Windsor Public Schools prohibits retaliation against any person who makes a good faith report or complaint of disability-based discrimination or who participates or cooperates in the investigation of such complaint.

Legal References:

29 U.S.C. §§ 705, 794
34 C.F.R. Part 104
42 U.S.C. § 12101 et seq.
28 C.F.R. Part 35

Protecting Students with Disabilities, Frequently Asked Questions About Section 504 and the Education of Children with Disabilities, Office for Civil Rights (March 17, 2011), available at http://www.ed.gov/about/offices/list/ocr/504faq.html

Dear Colleague Letter, United States Department of Education, Office for Civil Rights (January 19, 2012)

Policy approved: April 9, 2013
Policy revised: June 18, 2019

Windsor Public Schools
Windsor, CT

ADMINISTRATIVE REGULATIONS REGARDING STUDENTS AND SECTION 504 OF THE REHABILITATION ACT OF 1973 AND TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990

Windsor Board of Education Section 504/ADA Grievance/Complaint Procedures Regarding Discrimination Against Students on the Basis of Disability

Section 504 of the Rehabilitation Act of 1973 ("Section 504") and Title II of the Americans with Disabilities Act of 1990 ("Title II" or "ADA") (collectively, "Section 504/ADA") prohibit discrimination on the basis of disability. For the purposes of Section 504/ADA, the term "disability" with respect to an individual means: (a) a physical or mental impairment that substantially limits one or more major life activities of such individual; (b) a record of such an impairment; or (c) being regarded as having such an impairment.

I. Definitions

Free appropriate public education (FAPE): for purposes of Section 504, refers to the provision of regular or special education and related aids and services that are designed to meet individual educational needs of students with disabilities as adequately as the needs of students without disabilities are met, that are provided without cost (except for fees imposed on nondisabled students/parents), and is based upon adherence to procedures that satisfy the Section 504 requirements pertaining to educational setting, evaluation and placement, and procedural safeguards.

Major life activities: include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working. A major life activity also includes the operation of a major bodily function, such as the functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive systems. The operation of a major bodily function includes the operation of an individual organ within a body system.

Mitigating Measures: include, but are not limited to, (a) medication, medical supplies, equipment, appliances, low-vision devices (defined as devices that magnify, enhance, or otherwise augment a visual image, but not including ordinary eyeglasses or contact lenses), prosthetics including limbs and devices, hearing aid(s) and cochlear implant(s) or other implantable hearing devices, mobility devices, oxygen therapy equipment and supplies; (b) use of assistive technology; (c) reasonable modifications or auxiliary aids or services; (d) learned behavioral or adaptive neurological modifications; or (e) psychotherapy, behavioral therapy, or physical therapy.

Physical or Mental Impairment: (a) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems, such as: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine ~~or~~, (b) any mental or psychological disorder, such as intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disability; or (c) an impairment that is episodic or in remission if it would substantially limit a major life activity when active. Physical or mental impairment includes, but is not limited to, contagious and noncontagious diseases and

conditions such as the following: orthopedic, visual, speech, and hearing impairments, and cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, intellectual disability, emotional illness, dyslexia and other specific learning disabilities, Attention Deficit Hyperactivity Disorder, Human Immunodeficiency Virus infection (whether symptomatic or asymptomatic), tuberculosis, drug addiction, and alcoholism.

II. Procedures for Grievances/Complaints Alleging Discrimination on the Basis of Disability

A. Any eligible person, including any student, parent/guardian, staff member or other employee who feels that he/she has been discriminated against on the basis of disability (including differential treatment, harassment and retaliation) may submit a written complaint to the district's designated Section 504/ADA Coordinator (*see* contact information below) within thirty (30) school days of the alleged occurrence. Complaints by students and/or parents/guardians alleging discrimination involving students will be investigated under these procedures; complaints by employees or other non-students will be investigated under Administrative Regulation _____.

B. Timely reporting of complaints facilitates the prompt investigation and resolution of such complaints. If ~~the~~a complaint is filed relating to alleged discrimination occurring more than thirty (30) school days after the alleged occurrence, the Board's ability to investigate the allegations may be limited by the passage of time. Therefore, complaints received after thirty (30) school days of the alleged occurrence shall be investigated to the extent possible, given the passage of time and the impact on available information, witnesses and memory. If a complaint is made verbally, the individual taking the complaint will reduce ~~it~~the complaint to writing.

C. ~~B.~~ At any time, when a complaint involves discrimination that is directly related to a claim regarding the identification, evaluation or educational placement of a student under Section 504, the complainant may request that the Section 504/ADA Coordinator submit the complaint directly to an impartial hearing officer and request a due process hearing in accordance with Section III.D. Complaints regarding a student's rights with respect to his/her identification, evaluation or educational placement shall be addressed in accordance with the procedures set forth below in Section III.

D. ~~C.~~ Retaliation against any individual who complains pursuant to the Board's policy and regulations listed herein is strictly prohibited. The district will not tolerate any ~~reprisals or~~ retaliation that occur as a result of the good faith reporting or complaint of disability-based discrimination or as a result of an individual's participation or cooperating in the investigation of a complaint. The district will take necessary actions to prevent retaliation as a result of filing a complaint **or the participation in an investigation of a complaint**.

[NOTE: Districts should note that Section 504 does not provide a statute of limitations for filing grievances/complaints with the district. We recommend that districts encourage prompt reporting by suggesting that complaints be filed within thirty (30) school days in order to facilitate timely resolution of potential disputes.]

E. ~~D.~~ If the Section 504/ADA Coordinator is the subject of the complaint, the complaint should be submitted directly to the Superintendent who may conduct the investigation or appoint a designee to conduct the investigation in accordance with these procedures.

If the Superintendent is the subject of the complaint, the Board shall designate an appropriate party to conduct the investigation in accordance with these procedures.

F. ~~E.~~ Complaints will be investigated promptly ~~within timeframes identified below~~. Timeframes may be extended as needed given the complexity of the investigation, availability of individuals with relevant information and other extenuating circumstances. Confidentiality will be maintained by all persons involved in the investigation to the extent possible.

G. ~~F.~~ If a disability discrimination complaint raises a concern about bullying behavior, the Section 504 Coordinator shall notify the Safe School Climate Specialist or designee who shall coordinate any bullying investigation with the Section 504 Coordinator, so as to ensure that any such bullying investigation complies with the requirements of applicable Board policies.

H. The complaint should contain the following information:

1. The name of the complainant;
2. The date of the complaint;
3. The date(s) of the alleged discrimination;
4. The names of any witnesses or individuals relevant the complaint;
5. A detailed statement describing the circumstances in which the alleged discrimination occurred; and
6. The remedy requested.

However, all complaints will be investigated to the extent possible, even if such information is not included in the complaint. In such circumstances, additional information may be requested by the investigator as part of the investigation process.

~~G~~I. Upon receipt of the complaint, the individual investigating the complaint shall:

1. Provide a copy of the written complaint to the Superintendent of Schools;
2. Meet separately with the complainant and the respondent within ten (10) school days to discuss the nature of the complaint, identify individuals the complainant ~~believes~~and respondent believe have relevant information, and obtain any relevant documents the complainant may have;
3. Provide the complainant and the respondent with a copy of the applicable Board Section 504/ADA Policy and these administrative regulations;
4. Consider whether and which interim measures might be appropriate for an alleged victim and the respondent pending the outcome of the District's investigation;
5. ~~4.~~ Conduct an investigation of the factual basis of the complaint that is adequate, reliable, and impartial~~. Investigate the factual basis for the complaint~~, including conducting interviews with individuals with information and review of documents relevant to the complaint;
6. ~~5.~~ Maintain confidentiality to the extent practicable throughout the investigative process in accordance with state and federal law;
7. ~~6.~~ Communicate the outcome of the investigation in writing to the complainant, and ~~to any individual properly identified as a party~~ to the ~~complaint~~respondent (to the extent permitted by state and federal confidentiality requirements), within fifteen (15) school days from the date the complaint was received by the Section

504/ADA Coordinator or Superintendent. The written notice shall include a finding whether the complaint was substantiated and if so, shall identify how the district will remedy any identified violations of Section 504/ADA. The investigator may extend this deadline for no more than fifteen (15) additional school days if needed to complete the investigation. The complainant and the respondent shall be notified of any such extension. ~~The written notice shall include a finding whether the complaint was substantiated and if so, shall identify how the district will remedy any identified violations of Section 504/ADA;~~

8. ~~7.~~ If a complaint is made during summer recess, the complaint will be reviewed and addressed as quickly as possible given the availability of staff and/or other individuals who may have information relevant to the complaint. ~~If fixed timeframes cannot be met,~~, and no later than fifteen (15) school days after the start of the following school year. The complainant and the respondent will receive notice if the investigation has been impeded by the summer recess, and interim measures may be implemented as necessary (see sub-paragraph ~~6~~4);

9. ~~8.~~ Ensure that appropriate corrective action is taken whenever allegations are verified. When allegations are verified, ensure that measures to remedy the effects of the discrimination and prevent its recurrence are appropriately considered, and offered, when appropriate. Corrective action should include steps to avoid continuing discrimination.

10. ~~9.~~ In the event the investigator concludes that there is no violation of Section 504/ADA, the district may attempt to resolve the complainant's ongoing concerns, if possible.

~~H~~J. If the complainant or the respondent is not satisfied with the findings and conclusions of the investigation, the ~~complainant may present the complaint and written outcome to the Superintendent for~~appealing party may request review and reconsideration of the conclusion of the complaint within thirty (30) ~~calendar days of receiving the findings. This process provides an opportunity for the complainant to bring information to the Superintendent's attention that would change the outcome of the investigation. In submitting the complaint and written outcome for review, the complainant must~~days of receipt of the written outcome. In requesting review, the appealing party must submit the complaint, the written outcome of the complaint, and explain why he/she believes the factual information relied upon by the investigator was incomplete, the analysis of the facts was incorrect, and/or the appropriate legal standard was not applied, *and* how this information would change the investigator's determination in the case. Failure to provide all such information may result in the denial of the review.

Upon review of a written request from the ~~complainant~~appealing party, the Superintendent shall review the investigative results of the investigator and determine if further action and/or investigation is warranted. Such action may include consultation with the investigator and ~~complainant~~other relevant witnesses, a meeting with appropriate individuals to attempt to resolve the complaint or a decision affirming or overruling the investigator's conclusions or findings. The Superintendent shall provide written notice to the ~~complainant~~appealing party and the other party of his/her decision within ten (10) school days following the receipt of the written request for review. When a written request for review is received during summer recess, the Superintendent conduct the review as quickly as possible given the availability of staff and/or other individuals who may have information relevant to the review, and no later than ten (10)

school days after the start of the following school year. The Superintendent's decision shall be final.

III. Grievance/Complaint Resolution Procedures for Complaints Involving a Student's Identification, Evaluation or Educational Placement

Complaints regarding a student's identification, evaluation or educational placement shall generally be handled using the procedures described below. **However, at any time, the complainant may request that the Section 504/ADA Coordinator submit the complaint directly to an impartial hearing officer, and request a hearing in accordance with the provisions of subsection D (below).**

~~Drug/Alcohol Violations~~

~~If a student with a disability violates the Board's policies relative to the use or possession of illegal drugs or alcohol, the Board may take disciplinary action against such student for his/her illegal use or possession of drugs or alcohol to the same extent that the Board would take disciplinary action against nondisabled students. Such disciplinary action is not subject to the complaint or due process procedures outlined below.~~

A. Submission of Complaint to Section 504/ADA Coordinator

1. In order to facilitate the prompt investigation of complaints, any complaint regarding a student's identification, evaluation or educational placement under Section 504 should be forwarded to the district's Section 504/ADA Coordinator (*see* contact information below) within thirty (30) school days of the alleged date that the dispute regarding the student's identification, evaluation and/or education placement arose. Timely reporting of complaints facilitates the resolution of potential educational disputes.

2. The complaint concerning a student's identification, evaluation or educational placement should contain the following information:

   a. Full name of the student, age, and grade level;
   b. Name of parent(s);
   c. Address and relevant contact information for parent/complainant;
   d. Date of complaint;
   e. Specific areas of disagreement relating to the student's identification, evaluation and/or placement; and
   f. Remedy requested.

   However, all complaints will be investigated to the extent possible even if such information is not included in the written complaint. In such circumstances, additional information may be requested by the investigator as part of the investigation process.

3. Complaints will be investigated promptly within timeframes identified below. Timeframes may be extended as needed given the complexity of the investigation, availability of individuals with relevant information and other extenuating circumstances.

4. Upon receipt of the complaint, the Section 504/ADA Coordinator shall:

a. Forward a copy of the complaint to the Superintendent of Schools;

a. Meet with the complainant within ten (10) school days to discuss the nature of his/her concerns and determine if an appropriate resolution can be reached, or whether interim measures may be appropriate. If a complaint is made during summer recess, the complaint will be reviewed and addressed as quickly as possible given the availability of staff and other individuals who may have information relevant to the complaint, and no later than ten (10) school days after the start of the following school year;

b. If, following such a meeting, further investigation is deemed necessary, the Section 504/ADA Coordinator shall promptly investigate the factual basis for the complaint, consulting with any individuals reasonably believed to have relevant information, including the student and/or complainant; and

c. Communicate the results of his/her investigation in writing to the complainant and any persons named as parties to the complaint (to the extent permitted by state and federal confidentiality requirements) within fifteen (15) school days from the date the complaint was received by the Section 504/ADA Coordinator.

d. In the event that that the Section 504/ADA Coordinator has a conflict of interest that prevents him/her from serving in this role, the complaint shall be forwarded to the Superintendent who shall appoint an investigator who does not have a conflict of interest.

B. Review by Superintendent of Schools

1. ~~1.~~ If the complainant is not satisfied with the findings and~~/or resolution offered as a result of the Section 504/ADA Coordinator's review, the complainant~~ conclusions of the investigation, the appealing party may present the complaint and ~~the~~ written ~~statement of findings~~outcome to the Superintendent for review and reconsideration within thirty (30) calendar days of receiving the findings. This process provides an opportunity for ~~complainants~~the appealing party to bring information to the Superintendent's attention that would change the outcome of the investigation. In submitting the complaint and written outcome for review, the ~~complainant~~appealing party must explain why he/she believes the factual information relied upon by the investigator was incomplete, the analysis of the facts was incorrect, and/or the appropriate legal standard was not applied, *and* how this information would change the investigator's determination in the case. Failure to provide all such information may result in the denial of the review.

2. ~~2.~~ ~~The~~Upon review of a written request from the appealing party, the Superintendent shall review the ~~complaint and any relevant documents maintained by the Section 504/ADA Coordinator or other investigator and shall consult with the~~

~~Section 504/ADA Coordinator or other investigator regarding attempts to resolve the complaint. The Superintendent also shall consult with the complainant. The Superintendent may attempt to resolve the complainant's concerns alone, or with another appropriate administrator.3. Following the~~investigative results of the investigator and determine if further action and/or investigation is warranted. Such action may include consultation with the investigator and other relevant witnesses, a meeting with appropriate individuals to attempt to resolve the complaint or a decision affirming or overruling the investigator's conclusions or findings. The Superintendent~~'s review, he or she shall communicate his/her findings to the complainant~~ shall provide written notice to the appealing party of his/her decision within ten (10) school days following ~~his/her~~the receipt of the written request for review, or if the request is received during summer recess, as quickly as possible but no later than ten (10) school days after the start of the following school year.

3. ~~4.~~ If the complainant is not satisfied with the Superintendent's decision or proposed resolution, he/she may request that the Superintendent submit the matter to a neutral mediator or to an impartial hearing officer. This request for mediation or a hearing should be made within fifteen (15) school days of the Superintendent's decision. ~~Mediation shall only occur by mutual agreement of the parties.~~

C. Mediation Procedures:

1. A parent/guardian or student aged 18 or older may request mediation with a neutral mediator to attempt to resolve a disagreement with the decisions made by the professional staff of the school district with respect to the identification, evaluation or educational placement of the student.

2. ~~1.~~ A request for mediation regarding a student's identification, evaluation or educational placement under Section 504 should be forwarded to the district's Section 504/ADA Coordinator within thirty (30) school days of the alleged date that the dispute regarding the student's identification, evaluation, and/or education placement arose or within fifteen (15) school days of the Superintendent's decision in reviewing a complaint handled through the grievance/complaint procedure described in Section III.B, above. Mediation shall only occur by mutual agreement of the parties.

3. ~~2.~~ The request for mediation concerning a disagreement relating to a student's identification, evaluation or educational placement should contain the following information:

   a. Full name of the student, age, and grade level;
   b. Name of parent(s);
   c. Address and relevant contact information for parent/complainant;
   d. Date of complaint;
   e. Specific areas of disagreement relating to the student's identification, evaluation and/or placement; and
   f. Remedy requested.

4. ~~3.~~ Upon receipt of a request for mediation, the Section 504/ADA Coordinator shall:

   i. Forward a copy of the request for mediation to the Superintendent of Schools;

   ii. Inform the parent/guardian or student 18 years old or older as to whether the district agrees to mediation in writing;

   iii. ~~ii. Retain~~If the district agrees to mediation, the Board shall retain a neutral mediator who is knowledgeable about the requirements of Section 504/ADA and has an understanding of a free appropriate public education ("FAPE") under Section 504 and the distinctions between and among Section 504, the ADA and the Individuals with Disabilities Education Act ("IDEA").

   iv. If the district does not agree to mediation, the Section 504/ADA Coordinator shall inform the parent/guardian or student aged 18 or older of their right to request an impartial hearing.

5. ~~4.~~ The mediator shall inform all parties involved of the date, time and place of the mediation and of the right to have legal counsel or other representation at the complainant's own expense, if desired.

6. ~~5.~~ The mediator shall meet with the parties jointly, or separately, as determined by the mediator, and shall facilitate a voluntary settlement of the dispute between the parties, if possible.

7. ~~6.~~ All statements, offers, or discussions and/or information shared during the mediation process, but not available from other means, shall be confidential, and may not be used in a subsequent hearing or other administrative or judicial proceeding related to the disagreement that is the subject of the mediation.

8. ~~7.~~ If the parties are not able to reach a voluntary settlement of the dispute, the complainant may request an impartial hearing, as described below.

D. Impartial Hearing Procedures:

An impartial due process hearing is available to a parent/guardian of a student, or a student aged 18 years of age or older who disagrees with the decisions made by the professional staff of the school district with respect to the identification, evaluation or educational placement of the student, or otherwise makes a claim of discrimination relating to the identification, evaluation or educational placement of the student.

1. The request for ~~mediation~~a due process hearing concerning a disagreement relating to a student's identification, evaluation or educational placement should contain the following information:

   a. Full name of the student, age, and grade level;
   b. Name of parent(s);
   c. Address and relevant contact information for parent/complainant;
   d. Date of complaint;

e. Specific areas of disagreement relating to the student's identification, evaluation and/or placement; and

f. Remedy requested.

2. Upon receipt of a request for an impartial due process hearing, the Board shall retain an impartial hearing officer. The impartial hearing officer must be someone who is knowledgeable about the requirements of Section 504/ADA and has an understanding of a free appropriate public education ("FAPE") under Section 504 and the distinctions between and among Section 504, the ADA and the Individuals with Disabilities Education Act ("IDEA").

3. The impartial hearing officer shall schedule a pre-hearing conference with the District and the parent(s) or student aged 18 years of age or older (and/or legal counsel for the student) to identify the issue(s) for hearing, set the hearing schedule and address other administrative matters related to the hearing, including the option for mediation.

4. The impartial hearing officer shall inform all parties involved of the date, time and place of the hearing and of the right to present witnesses, other evidence and to be represented by legal counsel at each party's own expense, if desired.

5. The impartial hearing officer shall hear all aspects of the complainant's complaint concerning the identification, evaluation or educational placement of the student and shall reach a decision within forty-five (45) school days of receipt of the request for hearing. The decision shall be presented in writing to the complainant and to the Section 504/ADA Coordinator. The impartial hearing officer's decision shall be final.

6. An impartial hearing officer under Section 504 does not have jurisdiction to hear claims alleging discrimination, harassment or retaliation based on an individual's disability unless such a claim is ***directly related*** to a claim regarding the identification, evaluation, or educational placement of a student under Section 504.

7. The time limits noted herein may be extended for good cause shown for reasons including, but not limited to, permitting more time for thorough review of the record, presentation of evidence or opportunity for resolution.

E. Drug/Alcohol Violations

If a student with a disability violates the Board's policies relative to the use or possession of illegal drugs or alcohol, the Board may take disciplinary action against such student for his/her illegal use or possession of drugs or alcohol to the same extent that the Board would take disciplinary action against nondisabled students. Such disciplinary action is not subject to the complaint or due process procedures outlined above.

IV. The Section 504/ADA Coordinator for this district is:

Steven Carvalho
Director of Pupil and Special Education Services

Windsor Public Schools
601 Matianuck Avenue
Windsor, CT 06095
860-687-2000 x 1238

V. Complaints to Federal Agencies

At any time, the complainant has the right to file a formal complaint with the U.S. Department of Education, Office for Civil Rights, 8th Floor, 5 Post Office Square, Suite 900, Boston, MA 02109-0111 (TELEPHONE NUMBER (617) 289-0111);
http://www2.ed.gov/about/offices/list/ocr/docs/howto.html.

Regulation approved: June 18, 2019

Craig A. Cooke, Ph.D.
Superintendent

Windsor Public Schools
Windsor, CT