



**PULLMAN PUBLIC  
COMMUNITY FREE  
MONTESSORI K-9**

## Pullman Community Montessori

### PCM Regular Board Meeting

#### Date and Time

Tuesday December 19, 2023 at 11:00 AM PST

#### Location

PCM Board of Trustees meetings are held in the Gladish Community and Cultural Center room 100a. To increase accessibility we offer a virtual option for attendance. If you have difficulty accessing the remote meeting link please email [board@myPCM.org](mailto:board@myPCM.org)

All board meetings are open to the public. Meetings begin at 11:00 AM PST and are normally the fourth (4th) Thursday of each month. Public comment is a standing agenda item at each monthly meeting. Items will be addressed by the board according to the Meeting Agenda posted 48 hours prior to each meeting.

If you would like to make public comment you will be called on in the order you arrived. We generally allow 5 minutes for presentation of personal comments/questions/concerns/grievances. You may view our PCM Grievance and Conflict Resolution Policy and Procedures [here](#). Public comment should be shared with the board in writing in advance of the board meeting for us to better address your consideration. Please email to [board@mypcm.org](mailto:board@mypcm.org) or submit in paper form to the PCM office in Gladish Community and Cultural Center STE 212. You should receive confirmation of receipt of your written statement within 48 hours of submission. If you do not receive confirmation, please email [DesireeP@myPCM.org](mailto:DesireeP@myPCM.org)

Public comment is reserved for regular board meetings which are held the 4th Tuesday of each month. If you would like to make public comment please attend one of the regularly scheduled board meetings.

#### Agenda

	Purpose	Presenter	Time
<b>I. Opening Items</b>			<b>11:00 AM</b>

	Purpose	Presenter	Time
<b>A.</b> Record Attendance		Beverley Wolff	1 m
<b>B.</b> Call the Meeting to Order		Beverley Wolff	1 m
<b>C.</b> Approve Meeting Minutes: 11-14-23	Approve Minutes	Beverley Wolff	1 m

Please come with amendments ready to put in the chat.

**II. Public Comment** **11:03 AM**

<b>A.</b> Making Public Comments	FYI	Beverley Wolff	15 m
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Welcome! If you would like to make public comment you will be called on in the order you logged in/arrived.

- We generally allow 5 minutes for presentation of personal comments/questions/concerns/grievances.
- You may view our PCM Grievance and Conflict Resolution Policy and Procedures [here](#).
- Public comment should be shared with the board in writing in advance of the board meeting for us to better address your consideration.
- Please email to [board@mypcm.org](mailto:board@mypcm.org) or submit in paper form to the PCM office in Gladish Community and Cultural Center.
- You should receive confirmation of receipt of your written statement within 48 hours of submission.

**III. LEADERS Team Update & Compliance Check-in** **11:18 AM**

Per [PCM's Charter School Contract](#) with the Commission, PCM Trustees should regularly review the [Statement of Assurances](#) to ensure we are fulfilling our obligation to the contract.

For public transparency this is a copy of the [Commission's Oversight Guidance Manual](#)

What rubrics does the Commission use for evaluation?

[Financial Performance Framework](#)

[Academic Performance Framework](#)

[Organizational Performance Framework](#) ([expanded criterion](#))

[School Specific Goals \(2022-23\)](#) (1 Academic, 1 Operational)

<b>A.</b> HOS Update	FYI	Laylah Sullivan	5 m
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	Purpose	Presenter	Time
To help provide you questions for consideration remember to peruse your Governing for Greatness book.			

To prepare, please review the 11/01/2023 board dashboard.

**IV. Board Goals, Committee & Council Updates 11:23 AM**

- |           |   |      |                |      |
|-----------|---|------|----------------|------|
| <b>A.</b> | Individual Board Member Reports   | FYI  | All Trustees   | 10 m |
|           | Each trustee will briefly present on their progress towards individual goals and tasks. Additionally, trustees may report observations, feedback, or questions gathered since last meeting. |      |                |      |
| <b>B.</b> | LSEC (Leadership Support & Evaluation Committee) Report   | FYI  | Bev Wolff      |      |
|           | Currently inactive.   |      |                |      |
| <b>C.</b> | DC (Development Committee) Report   | FYI  | NA             |      |
|           | Currently inactive  |      |                |      |
| <b>D.</b> | GC (Governance Committee) Report  | FYI  | NA             |      |
|           | Currently inactive  |      |                |      |
| <b>E.</b> | EEC (Educational Excellence Committee) Report   | FYI  | Beverley Wolff |      |
|           | Nothing to report.  |      |                |      |
| <b>F.</b> | FC (Finance Committee) Report   | Vote | Aubree Guyton  | 10 m |
|           | Trustees will review the November financials as presented and recommended by the finance committee.   |      |                |      |

To inform your questioning remember your resources:

[50+ Smart Questions to Ask About Your Schools Finances](#)

[Board<>Staff Financial Contract](#)

**V. Other Business 11:43 AM**

- |           |  |      |                 |     |
|-----------|--|------|-----------------|-----|
| <b>A.</b> | 2024-25 Enrollment Policy & Procedures | Vote | Laylah Sullivan | 3 m |
|-----------|--|------|-----------------|-----|

	Purpose	Presenter	Time
The board will review and vote on the 2024-25 Enrollment Policy & Procedures.			
<b>B.</b> Policy & Procedure Updates: Harassment, Intimidation and Bullying of Students (3207/3207P)	Vote	Laylah Sullivan	3 m
<b>C.</b> Policy & Procedure Updates: Nondiscrimination and Affirmative Action (5010/5010P)	Vote	Laylah Sullivan	3 m
<b>D.</b> Policy & Procedure Updates: Highly Capable (2190/2190P)	Vote	Laylah Sullivan	3 m
<b>E.</b> Policy & Procedure Updates: Student Records (3231)	Vote	Laylah Sullivan	3 m
<b>F.</b> Policy & Procedure Updates: Excused and Unexcused Absences (3122/3122P)	Vote	Laylah Sullivan	3 m
<b>G.</b> Policy & Procedure Updates: Discipline (3241/3241P)	Vote	Laylah Sullivan	3 m
<b>H.</b> Policy & Procedure Updates: Restraint, Isolation, and Other Uses of Reasonable Force (3246P)	Vote	Laylah Sullivan	3 m
<b>I.</b> Policy & Procedure Updates: Section 504 (2162P)	Vote	Laylah Sullivan	3 m
<b>J.</b> Academic Update	FYI	Laylah Sullivan	30 m
The HOS will reground Trustees in what the Tier I and Tier II curriculum is and what assessments are used to measure growth. This will lead Trustees into an update on how PCM is performing to date. This academic update will be broken up between this meeting and the January meeting.			
<b>K.</b> Recurrent Enrollment (w/ historic data review)	Vote	Laylah Sullivan	15 m
<b>VI. Closing Items</b>			<b>12:55 PM</b>
<b>A.</b> Adjourn Meeting	Vote	Beverley Wolff	1 m

**Grounding Docs:** [Board Norms-We are LEADERS too-Structure and Responsibilities Overview](#), [PCM Logic Model](#), [EEMPS Rubric](#), [School-Wide Reflective Practice Inventory](#), [Bylaws](#)

**Resources:** Key Resources BOX Folder, [OPMA Resources](#), [App Board Commitments & Background](#), [Committee Descriptions](#), [Org Charts](#), [Board Member Application Full Packet](#), [Prospective Board Member Questionnaire](#)

# Coversheet

## HOS Update

**Section:** III. LEADERS Team Update & Compliance Check-in  
**Item:** A. HOS Update  
**Purpose:** FYI  
**Submitted by:**  
**Related Material:** PCM Board Dashboard 12-1-2023.xlsx

## Notice

The following file is attached to this PDF. You will need to open this packet in an application that supports attachments to pdf files, e.g. [Adobe Reader](#):

PCM Board Dashboard 12-1-2023.xlsx

# Coversheet

## FC (Finance Committee) Report

**Section:** IV. Board Goals, Committee & Council Updates  
**Item:** F. FC (Finance Committee) Report  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 2. PCM Income Statement 11.2023.pdf  
6c. PCM AP Register 11.2023.pdf  
5. PCM Statement of Cash Flows 11.2023.pdf  
3. PCM Balance Sheet 11.2023.pdf  
4a. PCM Detailed BvA 10.2023.pdf  
6d. PCM Non-AP Register 11.2023.pdf  
4. PCM BvA 11.2023.pdf  
6a. PCM Auditing Officer Approval 11.2023.pdf  
6b. PCM Payroll Report 11.2023.pdf  
6. PCM Payroll and AP Certification 11.2023.pdf  
1. PCM Finance Dashboard 11.2023.pdf

### BACKGROUND:

The following payments as audited and certified by the auditing officer, as required by RCW 42.24.080, and those expense reimbursements claims certified, as required by RCW 42.24.090, are approved for payment. In addition, payroll payments in the amount of \$90,330.24 are also approved.

#### **General Fund Accounts Payable**

Total electronic payments totaling \$50,384.80 and  
Check numbers 1095 and 1096 totaling \$17,856.50

#### **Non-AP Cash Disbursements**

Total electronic payments totaling \$1,901.37 and  
Check numbers 1061, 1062, 1073, and 1094 totaling \$5,128.12

#### **Payroll**

Total electronic payments totaling \$90,330.24 and  
Payroll check numbers N/A totaling \$0

### RECOMMENDATION:

The recommendation presented by the Treasurer on behalf of the Finance Committee represents the initial motion.

**Proposed motion:** I second the motion to approve the October financials recommended and as presented by the finance committee.



# Pullman Community Montessori

## Profit and Loss

November 2023

	TOTAL			
	NOV 2023	OCT 2023 (PP)	CHANGE	SEP - NOV, 2023 (YTD)
<b>Revenue</b>				
3100 Local Donations	25.00	25.00	0.00	75.00
3198 Sales - School Meals	1,595.20	1,281.60	313.60	3,701.80
3199 Local Income - misc				2,587.31
3201 Interest Income (Public)	0.02	0.02	0.00	0.06
3520 Private Foundations / Grants	40,000.00		40,000.00	344,000.00
4000 General Apportionment	77,127.82	126,939.51	-49,811.69	342,897.41
4021 Special Education - General Apportionment	816.23	1,305.97	-489.74	3,591.42
4121 Special Education - State	12,096.14	19,353.82	-7,257.68	53,223.02
4155 Learning Assistance	2,971.35		2,971.35	2,971.35
4198 State - School Food Service	76.35	83.75	-7.40	160.10
4199 Transportation	1,908.22	3,053.17	-1,144.95	8,396.20
5198 Federal - School Food Services (NSLP)	4,661.35	4,581.62	79.73	9,242.97
5199 Federal - Misc Grants	120.00	120.00	0.00	360.00
5200 Federal - CSP	19,225.28	23,396.36	-4,171.08	54,464.53
<b>Total Revenue</b>	<b>\$160,622.96</b>	<b>\$180,140.82</b>	<b>\$ -19,517.86</b>	<b>\$825,671.17</b>
<b>GROSS PROFIT</b>	<b>\$160,622.96</b>	<b>\$180,140.82</b>	<b>\$ -19,517.86</b>	<b>\$825,671.17</b>
<b>Expenditures</b>				
6005 Certificated - Executive Management	7,725.00	7,725.00	0.00	23,175.03
6106 Classified - Operations Staff	9,146.88	8,913.61	233.27	23,752.06
6110 Classified - Instructional Management	6,866.68	6,866.68	0.00	20,600.04
6196 Nurses	3,554.65	3,973.73	-419.08	13,237.02
6198 Classified - Lunch Staff	6,403.80	6,584.14	-180.34	19,707.89
6199 Classified - Transportation Staff	3,966.40	5,395.85	-1,429.45	14,760.70
6270 Certificated - Teachers - Regular	24,684.51	25,056.83	-372.32	73,920.00
6275 Certificated - Teachers - SPED	4,927.96	4,927.85	0.11	14,783.77
6278 Certificated - Stipends	1,833.32	1,833.32	0.00	5,291.63
6370 Classified - Teachers - Regular	4,286.78	3,910.34	376.44	12,107.46
6371 Classified - Teachers - Substitutes	1,411.66	1,196.48	215.18	3,915.92
6373 Classified - Aides - Regular	22,643.44	27,430.02	-4,786.58	76,042.48
6376 Classified - Aides - SPED	4,826.15	4,424.18	401.97	13,262.69
6378 Classified - Stipends	3,250.00	3,250.00	0.00	10,375.00
7051 Social Security/Medicare/FUTA	4,369.21	4,541.78	-172.57	13,319.46
7052 Worker's Compensation Insurance	887.79	938.47	-50.68	2,752.36
7053 State Unemployment	201.66	270.70	-69.04	752.93
7055 Retirement Contribution - DRS	10,818.86	11,584.29	-765.43	33,447.35
7056 Health Insurance - SEBB	23,100.00	30,867.00	-7,767.00	75,967.00
8010 Legal	2,472.00	1,307.00	1,165.00	9,129.00
8015 Oversight Fee (3%)	2,847.59	4,413.53	-1,565.94	12,226.33
8035 Payroll & Accounting Services	10,000.00	10,000.00	0.00	30,000.00
8040 Special Ed Services	11,120.21	10,943.74	176.47	23,588.51

# Pullman Community Montessori

## Profit and Loss

November 2023

	TOTAL			
	NOV 2023	OCT 2023 (PP)	CHANGE	SEP - NOV, 2023 (YTD)
8050 Contracted Services - Tech	1,661.66	1,623.90	37.76	6,344.52
8053 Contracted Services - Misc	0.00	5,158.20	-5,158.20	5,158.20
8054 Contracted Services - Afterschool		5,727.24	-5,727.24	5,727.24
8060 Dues & Memberships		0.00	0.00	620.00
8505 Board Expenses	833.33	833.33	0.00	2,499.99
8510 Classroom / Teaching Supplies & Materials	250.00	1,067.57	-817.57	15,008.88
8515 Special Ed Supplies & Materials		278.74	-278.74	1,012.76
8530 Equipment / Furniture				1,003.41
8535 Telephone / Internet	648.38	644.63	3.75	1,928.33
8540 Technology - Hardware	1,380.64	1,486.81	-106.17	3,657.02
8541 Technology - Software	1,722.88	1,404.29	318.59	11,065.60
8565 Office Expense	1,284.75	2,225.93	-941.18	8,289.07
8570 Staff Development	1,790.00	2,180.47	-390.47	7,459.47
8575 Staff Recruitment		492.02	-492.02	708.11
8580 Student Recruitment / Marketing	195.00	195.00	0.00	535.00
8585 School Meals / Lunch	7,990.90	9,320.16	-1,329.26	26,854.70
8590 Travel (Staff)	1,930.11		1,930.11	1,930.11
8595 Fundraising	524.39		524.39	524.39
8599 Transportation (student)	343.91	3,852.80	-3,508.89	6,214.46
9005 Insurance Expense	1,943.21	1,747.29	195.92	5,437.79
9010 Janitorial	3,253.63	3,254.24	-0.61	9,004.84
9015 Building and Land Rent / Lease	18,417.27	18,417.27	0.00	55,251.81
9020 Repairs & Maintenance Bld	40.00		40.00	40.00
9045 Interest Expense	3,096.05	2,277.02	819.03	8,056.73
<b>Total Expenditures</b>	<b>\$218,650.66</b>	<b>\$248,541.45</b>	<b>\$ -29,890.79</b>	<b>\$710,447.06</b>
<b>NET OPERATING REVENUE</b>	<b>\$ -58,027.70</b>	<b>\$ -68,400.63</b>	<b>\$10,372.93</b>	<b>\$115,224.11</b>
Other Expenditures				
9050 Depreciation	19,012.91		19,012.91	19,012.91
<b>Total Other Expenditures</b>	<b>\$19,012.91</b>	<b>\$0.00</b>	<b>\$19,012.91</b>	<b>\$19,012.91</b>
<b>NET OTHER REVENUE</b>	<b>\$ -19,012.91</b>	<b>\$0.00</b>	<b>\$ -19,012.91</b>	<b>\$ -19,012.91</b>
<b>NET REVENUE</b>	<b>\$ -77,040.61</b>	<b>\$ -68,400.63</b>	<b>\$ -8,639.98</b>	<b>\$96,211.20</b>

# Pullman Community Montessori

## Bill Payment List

November 2023

DATE	NUM	VENDOR	AMOUNT	MEMO/DESCRIPTION
<b>1000 Banner Bank x4353 - PUBLIC Checking</b>				
11/01/2023	EFT	Raza Development Fund, Inc (v)	-3,340.80	
11/17/2023	EFT	WA Dept of Retirement Systems	-53.62	
11/17/2023	EFT	WA Dept of Retirement Systems	-18,624.93	
11/14/2023		Great American Insurance Group	-274.84	
11/07/2023	EFT	Great American Insurance Group	-1,472.45	
11/13/2023	EFT	URM Stores Inc	-8,661.47	
11/20/2023	1096	Friends of Gladish	-12,698.30	
11/24/2023	1095	Dan Cools	-5,158.20	
11/30/2023	EFT	Banner Bank	-6,115.02	
11/30/2023	EFT	Joule Growth Partners	-10,000.00	
11/30/2023	EFT	True Measure Collaborative	-1,791.67	
11/30/2023	EFT	Nathaniel A Porter	-25.00	
11/30/2023	EFT	Nathaniel A Porter	-25.00	
<b>Total for 1000 Banner Bank x4353 - PUBLIC Checking</b>			<b>\$ -68,241.30</b>	
Not Specified				
11/01/2023		National Center for Montessori in the Public Sector	0.00	
<b>Total for Not Specified</b>			<b>\$0.00</b>	

# Pullman Community Montessori

## Statement of Cash Flows

September - November, 2023

	SEP 2023	OCT 2023	NOV 2023	TOTAL
<b>OPERATING ACTIVITIES</b>				
Net Revenue	241,652.44	-68,400.63	-77,040.61	\$96,211.20
Adjustments to reconcile Net Revenue to Net Cash provided by operations:				\$0.00
1100 Accounts Receivable (A/R)	3,709.96	27,880.32	-35,828.92	\$ -4,238.64
1150 Prepaids & Other Assets	15,395.75	1,058.12	1,058.12	\$17,511.99
1550 Accumulated Depreciation			19,012.91	\$19,012.91
2100 Accounts Payable	-73,867.38	-69,621.96	37,041.45	\$ -106,447.89
2102 Banner Bank Mastercard	0.00	0.00	0.00	\$0.00
2101 Accrued Accounts & Payroll Payable	8,126.23	-1,906.93	-16,108.75	\$ -9,889.45
2155 Retirement Payable - DRS	4,341.74	643.93	967.49	\$5,953.16
2156 Health Insurance Payable - SEBB	-8,671.50	-5,003.00	3,224.50	\$ -10,450.00
2158 LTD Payable	11.71	64.24	24.31	\$100.26
2180 Refundable Advances	-304,000.00			\$ -304,000.00
2202 Loan Payable - short-term	-60,678.86			\$ -60,678.86
<b>Total Adjustments to reconcile Net Revenue to Net Cash provided by operations:</b>	<b>-415,632.35</b>	<b>-46,885.28</b>	<b>9,391.11</b>	<b>\$ -453,126.52</b>
<b>Net cash provided by operating activities</b>	<b>\$ -173,979.91</b>	<b>\$ -115,285.91</b>	<b>\$ -67,649.50</b>	<b>\$ -356,915.32</b>
<b>INVESTING ACTIVITIES</b>				
1501 Fixed Assets-Capitalized Equipment	-5,680.42			\$ -5,680.42
1504 Fixed Assets-Furniture, Fixtures & Other		-29,231.07		\$ -29,231.07
1510 Facilities - In Progress	-1,917.00			\$ -1,917.00
<b>Net cash provided by investing activities</b>	<b>\$ -7,597.42</b>	<b>\$ -29,231.07</b>	<b>\$0.00</b>	<b>\$ -36,828.49</b>
<b>FINANCING ACTIVITIES</b>				
2502 Loan Payable - long-term	-1,416.73	298,625.03	-1,430.94	\$295,777.36
2510 Deferred Rent Liability	5,718.97	5,718.97	5,718.97	\$17,156.91
2998 Unrestricted Net Assets			-50,000.00	\$ -50,000.00
2999 Restricted Net Assets			50,000.00	\$50,000.00
<b>Net cash provided by financing activities</b>	<b>\$4,302.24</b>	<b>\$304,344.00</b>	<b>\$4,288.03</b>	<b>\$312,934.27</b>
<b>NET CASH INCREASE FOR PERIOD</b>	<b>\$ -177,275.09</b>	<b>\$159,827.02</b>	<b>\$ -63,361.47</b>	<b>\$ -80,809.54</b>

# Pullman Community Montessori

## Balance Sheet

As of November 30, 2023

	TOTAL		
	AS OF NOV 30, 2023	AS OF OCT 31, 2023 (PP)	CHANGE
<b>ASSETS</b>			
Current Assets			
Bank Accounts			
1000 Banner Bank x4353 - PUBLIC Checking	281,978.92	345,337.41	-63,358.49
1001 Banner Bank x4695 - PRIVATE Checking	1,775.20	1,778.20	-3.00
1005 Banner Bank x3234 - PUBLIC Savings	1,095.80	1,095.78	0.02
<b>Total Bank Accounts</b>	<b>\$284,849.92</b>	<b>\$348,211.39</b>	<b>\$ -63,361.47</b>
Accounts Receivable			
1100 Accounts Receivable (A/R)	64,618.62	28,789.70	35,828.92
<b>Total Accounts Receivable</b>	<b>\$64,618.62</b>	<b>\$28,789.70</b>	<b>\$35,828.92</b>
Other Current Assets			
1150 Prepays & Other Assets	26,521.86	27,579.98	-1,058.12
<b>Total Other Current Assets</b>	<b>\$26,521.86</b>	<b>\$27,579.98</b>	<b>\$ -1,058.12</b>
<b>Total Current Assets</b>	<b>\$375,990.40</b>	<b>\$404,581.07</b>	<b>\$ -28,590.67</b>
Fixed Assets			
1501 Fixed Assets-Capitalized Equipment	52,450.78	52,450.78	0.00
1503 Fixed Assets-Leasehold Improvements	540,149.69	540,149.69	0.00
1504 Fixed Assets-Furniture, Fixtures & Other	98,069.49	98,069.49	0.00
1510 Facilities - In Progress	29,592.08	29,592.08	0.00
1550 Accumulated Depreciation	-156,681.39	-137,668.48	-19,012.91
<b>Total Fixed Assets</b>	<b>\$563,580.65</b>	<b>\$582,593.56</b>	<b>\$ -19,012.91</b>
<b>TOTAL ASSETS</b>	<b>\$939,571.05</b>	<b>\$987,174.63</b>	<b>\$ -47,603.58</b>
<b>LIABILITIES AND EQUITY</b>			
Liabilities			
Current Liabilities			
Accounts Payable			
2100 Accounts Payable	108,183.08	71,141.63	37,041.45
<b>Total Accounts Payable</b>	<b>\$108,183.08</b>	<b>\$71,141.63</b>	<b>\$37,041.45</b>
Other Current Liabilities			
2101 Accrued Accounts & Payroll Payable	68,516.66	84,625.41	-16,108.75
2155 Retirement Payable - DRS	18,716.95	17,749.46	967.49
2156 Health Insurance Payable - SEBB	-40,122.00	-43,346.50	3,224.50
2158 LTD Payable	382.68	358.37	24.31
<b>Total Other Current Liabilities</b>	<b>\$47,494.29</b>	<b>\$59,386.74</b>	<b>\$ -11,892.45</b>
<b>Total Current Liabilities</b>	<b>\$155,677.37</b>	<b>\$130,528.37</b>	<b>\$25,149.00</b>

# Pullman Community Montessori

## Balance Sheet

As of November 30, 2023

	TOTAL		
	AS OF NOV 30, 2023	AS OF OCT 31, 2023 (PP)	CHANGE
<b>Long-Term Liabilities</b>			
2502 Loan Payable - long-term	787,283.09	788,714.03	-1,430.94
2510 Deferred Rent Liability	79,080.87	73,361.90	5,718.97
<b>Total Long-Term Liabilities</b>	<b>\$866,363.96</b>	<b>\$862,075.93</b>	<b>\$4,288.03</b>
<b>Total Liabilities</b>	<b>\$1,022,041.33</b>	<b>\$992,604.30</b>	<b>\$29,437.03</b>
<b>Equity</b>			
2998 Unrestricted Net Assets	-260,482.34	-210,482.34	-50,000.00
2999 Restricted Net Assets	81,800.86	31,800.86	50,000.00
Net Revenue	96,211.20	173,251.81	-77,040.61
<b>Total Equity</b>	<b>\$ -82,470.28</b>	<b>\$ -5,429.67</b>	<b>\$ -77,040.61</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>\$939,571.05</b>	<b>\$987,174.63</b>	<b>\$ -47,603.58</b>

## Pullman Community Montessori Budget vs. Actuals: Budget\_FY24\_P&L - FY24 P&L September - November, 2023

	Total			
	Actual	Budget	over Budget	% of Budget
<b>Revenue</b>				
3100 Local Donations	75.00	25,000.00	-24,925.00	0.30%
3198 Sales - School Meals	3,701.80	21,456.00	-17,754.20	17.25%
3199 Local Income - misc	2,587.31		2,587.31	
3201 Interest Income (Public)	0.06		0.06	
3520 Private Foundations / Grants	344,000.00	255,000.00	89,000.00	134.90%
4000 General Apportionment	342,897.41	1,542,557.00	-1,199,659.59	22.23%
4021 Special Education - General Apportionment	3,591.42	16,325.00	-12,733.58	22.00%
4121 Special Education - State	53,223.02	241,950.00	-188,726.98	22.00%
4155 Learning Assistance	2,971.35	13,506.00	-10,534.65	22.00%
4165 Transitional Bilingual		7,043.00	-7,043.00	0.00%
4174 Highly Capable		4,052.00	-4,052.00	0.00%
4198 State - School Food Service	160.10		160.10	
4199 Transportation	8,396.20	82,769.00	-74,372.80	10.14%
5101 Title 1		20,146.00	-20,146.00	0.00%
5102 Title 2		12,033.00	-12,033.00	0.00%
5124 Federal SPED - IDEA		18,628.00	-18,628.00	0.00%
5198 Federal - School Food Services (NSLP)	9,242.97	31,827.00	-22,584.03	29.04%
5199 Federal - Misc Grants	360.00	73,540.00	-73,180.00	0.49%
5200 Federal - CSP	54,464.53	381,299.00	-326,834.47	14.28%
<b>Total Revenue</b>	<b>\$ 825,671.17</b>	<b>\$ 2,747,131.00</b>	<b>-\$ 1,921,459.83</b>	<b>30.06%</b>
<b>Gross Profit</b>	<b>\$ 825,671.17</b>	<b>\$ 2,747,131.00</b>	<b>-\$ 1,921,459.83</b>	<b>30.06%</b>
<b>Expenditures</b>				
6005 Certificated - Executive Management	23,175.03	92,700.00	-69,524.97	25.00%
6106 Classified - Operations Staff	23,752.06	110,206.00	-86,453.94	21.55%
6110 Classified - Instructional Management	20,600.04	80,000.00	-59,399.96	25.75%
6196 Nurses	13,237.02	54,036.00	-40,798.98	24.50%
6198 Classified - Lunch Staff	19,707.89	71,167.00	-51,459.11	27.69%
6199 Classified - Transportation Staff	14,760.70	37,632.00	-22,871.30	39.22%
6270 Certificated - Teachers - Regular	72,000.26	355,917.00	-283,916.74	20.23%
6275 Certificated - Teachers - SPED	14,783.77	59,135.00	-44,351.23	25.00%
6278 Certificated - Stipends	5,291.63	20,000.00	-14,708.37	26.46%
6371 Classified - Teachers - Substitutes	3,915.92	11,700.00	-7,784.08	33.47%
6372 Classified - Counselors	14,026.74	68,000.00	-53,973.26	20.63%
6373 Classified - Aides - Regular	62,385.95	202,280.00	-139,894.05	30.84%
6376 Classified - Aides - SPED	26,919.22	80,540.00	-53,620.78	33.42%
6378 Classified - Stipends	10,375.00		10,375.00	
7051 Social Security/Medicare/FUTA	13,319.46	58,311.00	-44,991.54	22.84%
7052 Worker's Compensation Insurance	2,752.36	10,071.00	-7,318.64	27.33%
7053 State Unemployment	752.93	8,927.00	-8,174.07	8.43%
7055 Retirement Contribution - DRS	33,447.35	126,767.00	-93,319.65	26.38%
7056 Health Insurance - SEBB	75,967.00	316,800.00	-240,833.00	23.98%
8005 Audits		37,611.00	-37,611.00	0.00%
8010 Legal	9,129.00	15,000.00	-5,871.00	60.86%
8015 Oversight Fee (3%)	12,226.33	57,246.00	-45,019.67	21.36%
8035 Payroll & Accounting Services	30,000.00	123,000.00	-93,000.00	24.39%
8040 Special Ed Services	23,588.51	93,368.00	-69,779.49	25.26%
8050 Contracted Services - Tech	6,344.52	5,125.00	1,219.52	123.80%
8051 Contracted Services - Program Support / PD		4,000.00	-4,000.00	0.00%
8053 Contracted Services - Misc	5,158.20		5,158.20	
8054 Contracted Services - Afterschool	5,727.24	31,570.00	-25,842.76	18.14%

8055 Printing		3,570.00	-3,570.00	0.00%
8060 Dues & Memberships	620.00	2,180.00	-1,560.00	28.44%
8505 Board Expenses	2,499.99	1,500.00	999.99	166.67%
8510 Classroom / Teaching Supplies & Materials	15,008.88	23,500.00	-8,491.12	63.87%
8515 Special Ed Supplies & Materials	1,012.76	5,100.00	-4,087.24	19.86%
8520 Textbooks / Workbooks		800.00	-800.00	0.00%
8530 Equipment / Furniture	1,003.41	3,750.00	-2,746.59	26.76%
8535 Telephone / Internet	1,928.33	7,834.00	-5,905.67	24.61%
8540 Technology - Hardware	3,657.02	4,175.00	-517.98	87.59%
8541 Technology - Software	11,065.60	35,989.00	-24,923.40	30.75%
8545 Student Testing & Assessment		4,515.00	-4,515.00	0.00%
8550 Field Trips		10,200.00	-10,200.00	0.00%
8561 Student Activities		3,468.00	-3,468.00	0.00%
8565 Office Expense	8,289.07	10,200.00	-1,910.93	81.27%
8570 Staff Development	7,459.47	11,878.00	-4,418.53	62.80%
8575 Staff Recruitment	708.11	3,570.00	-2,861.89	19.84%
8580 Student Recruitment / Marketing	535.00	8,160.00	-7,625.00	6.56%
8585 School Meals / Lunch	26,854.70	55,948.00	-29,093.30	48.00%
8590 Travel (Staff)	1,930.11	2,550.00	-619.89	75.69%
8595 Fundraising	524.39	612.00	-87.61	85.68%
8599 Transportation (student)	6,214.46	29,000.00	-22,785.54	21.43%
9005 Insurance Expense	5,437.79	25,092.00	-19,654.21	21.67%
9010 Janitorial	9,004.84	22,950.00	-13,945.16	39.24%
9015 Building and Land Rent / Lease	55,251.81	230,854.00	-175,602.19	23.93%
9020 Repairs & Maintenance Bld	40.00		40.00	
9045 Interest Expense	8,056.73	48,056.00	-39,999.27	16.77%
9999 Reserves / Contingency		71,034.00	-71,034.00	0.00%
<b>Total Expenditures</b>	<b>\$ 710,446.60</b>	<b>\$ 2,757,594.00</b>	<b>-\$ 2,047,147.40</b>	<b>25.76%</b>
<b>Net Operating Revenue</b>	<b>\$ 115,224.57</b>	<b>-\$ 10,463.00</b>	<b>\$ 125,687.57</b>	<b>-1101.26%</b>
<b>Other Expenditures</b>				
9050 Depreciation	19,012.91	23,720.76	-4,707.85	80.15%
<b>Total Other Expenditures</b>	<b>\$ 19,012.91</b>	<b>\$ 23,720.76</b>	<b>-\$ 4,707.85</b>	<b>80.15%</b>
<b>Net Other Revenue</b>	<b>-\$ 19,012.91</b>	<b>-\$ 23,720.76</b>	<b>\$ 4,707.85</b>	<b>80.15%</b>
<b>Net Revenue</b>	<b>\$ 96,211.66</b>	<b>-\$ 34,183.76</b>	<b>\$ 130,395.42</b>	<b>-281.45%</b>



**Pullman Community Montessori  
Non-AP Cash Disbursements  
November 2023**

	Date	Transaction Type	Num	Name	Memo/Description	Amount
<b>1000 Banner Bank x4353 - PUBLIC Checking</b>						
	11/01/2023	Check	1061	S3 Stores, Inc		-2,301.12
	11/01/2023	Check	1062	S3 Stores, Inc		-537.00
	11/01/2023	Check	1073	Jennifer Duckworth		-500.00
	11/02/2023	Expenditure		eFax	J2 EFAX SERVICE 6922 HOLLYWOOD J2 EFAX SERVICE 6922 HOLLYWOOD BLVD 323-817-3205CA C#	-10.00
	11/02/2023	Expenditure		Transparent	ACH transparent clas transpar ACH transparent clas transparen CCD ST-Y8W9E0X5F1S2 18	-241.90
	11/02/2023	Expenditure		eFax	J2 EFAX SERVICE 6922 HOLLYWOOD J2 EFAX SERVICE 6922 HOLLYWOOD BLVD 323-817-3205CA C#	-10.00
	11/02/2023	Expenditure		eFax	J2 EFAX SERVICE 6922 HOLLYWOOD J2 EFAX SERVICE 6922 HOLLYWOOD BLVD 323-817-3205CA C#	-10.00
	11/06/2023	Expenditure		Calendly	CALENDLY 88 N Avondale Rd #6 AVO CALENDLY 88 N Avondale Rd #6 AVONDALE ESTAGA C# *8765	-250.54
	11/08/2023	Expenditure		eFax	J2 EFAX SERVICE 6922 HOLLYWOOD J2 EFAX SERVICE 6922 HOLLYWOOD BLVD 323-817-3205CA C#	-10.00
	11/10/2023	Expenditure		eFax	J2 EFAX SERVICE 6922 HOLLYWOOD J2 EFAX SERVICE 6922 HOLLYWOOD BLVD 323-817-3205CA C#	-18.99
	11/10/2023	Expenditure		Magic-Wrighter (e-Funds)	ACH MAGIC-WRIGHTER INVOICE ACH MAGIC-WRIGHTER INVOICE PPD XXXXXX4841 MSFT * E0300PUIP 1 Microsoft Way MSFT * E0300PUIP 1 Microsoft Way MSBILL.INFOWA C# *876	-34.95
	11/13/2023	Expenditure		Microsoft		-29.14
	11/14/2023	Check	1094	Lure of the North		-1,790.00
	11/15/2023	Expenditure		Little Green Light	ACH LittleGreenLight PURCHASE ACH LittleGreenLight PURCHASE PPD XXXXXX5729	-524.39
	11/22/2023	Expenditure		Verizon Wireless	ACH VERIZON WIRELESS PAYMENTS ACH VERIZON WIRELESS PAYMENTS CCD XXXXXXXX4300001 6223	-348.38
	11/27/2023	Expenditure		Gusto	Q4 tax reconciliation	-0.06
	11/30/2023	Expenditure		Gusto		-410.02
<b>Total for 1000 Banner Bank x4353 - PUBLIC Checking</b>						<b>- \$7,026.49</b>
<b>1001 Banner Bank x4695 - PRIVATE Checking</b>						
	11/01/2023	Expenditure		Banner Bank	Paper statement fee	-3.00
<b>Total for 1001 Banner Bank x4695 - PRIVATE Checking</b>						<b>- \$ 3.00</b>



**Pullman Community Montessori  
FY 22-23 Budget Status Report  
Nov-23**

	Actual	Budget	Over/(Under) Budget	% Received / Spent	Forecast	% of Forecast	Notes
<b>Revenue</b>							
Local Support	6,364	46,456	-40,092	13.70%	42,828	14.86%	
State Revenue - General	342,897	1,542,557	-1,199,660	22.23%	1,307,198	26.23%	
State Revenue - Special Purpose	68,342	365,645	-297,303	18.69%	312,873	21.84%	Total loss due to enrollment: \$228k
Federal Revenue	64,068	537,473	-473,406	11.92%	570,682	11.23%	
Grants & Other Sources	344,000	255,000	89,000	134.90%	420,000	81.90%	Added \$50k WA Charters Grant
<b>Total Revenue</b>	<b>825,671</b>	<b>2,747,131</b>	<b>-1,921,460</b>	<b>30.06%</b>	<b>2,653,580</b>	<b>31.12%</b>	
<b>Gross Profit</b>	<b>825,671</b>	<b>2,747,131</b>	<b>-1,921,460</b>	<b>30.06%</b>			
<b>Expenditures</b>							
Salaries	324,931	1,243,310	-918,379	26.13%	1,182,838	27.47%	Overall \$60k drop in salaries and \$24k drop in benefits
Personnel Taxes & Benefits	126,239	520,876	-394,637	24.24%	496,515	25.43%	
Contracted Services	92,174	366,920	-274,746	25.12%	379,613	24.28%	Various small increases (tech support, credentialing, SPED)
School Operations	118,542	228,499	-109,957	51.88%	247,285	47.94%	School meals increase \$24k, transpo down \$11k
Facility Operations & Maintenance	77,791	326,952	-249,161	23.79%	345,102	22.54%	
Contingency		71,034	0	0.00%	0	100.00%	Contingency 100% used
<b>Total Expenditures</b>	<b>739,678</b>	<b>2,757,591</b>	<b>-1,946,880</b>	<b>26.82%</b>	<b>2,651,353</b>	<b>27.90%</b>	Fiscal Year Elapsed: 25%
<b>Net Operating Revenue</b>	<b>85,993</b>	<b>-10,460</b>	<b>96,453</b>	<b>-822.12%</b>	<b>2,227</b>	<b>3860.82%</b>	
<b>Net Revenue</b>	<b>85,993</b>	<b>-10,460</b>	<b>96,453</b>	<b>-822.12%</b>	<b>2,227</b>	<b>3860.82%</b>	
<b>Balance Sheet Expenses</b>							
Bridge Loan Principal	60,679	59,385	1,294	102.18%	61,127	99.27%	
Kitchen Renovations	0	39,000	-39,000	0.00%	0	0.00%	Moved to 24-25 due to construction delays
<b>Balance Sheet Expenditures</b>	<b>60,679</b>	<b>98,385</b>	<b>-37,706</b>	<b>61.68%</b>	<b>61,127</b>	<b>99.27%</b>	
<b>All Expenditures</b>	<b>800,357</b>	<b>2,855,976</b>	<b>-2,055,619</b>	<b>28.02%</b>	<b>2,712,480</b>	<b>29.51%</b>	
<b>Board Approved Expenditures</b>	<b>2,855,976</b>						

AUDITING OFFICER CERTIFICATION AND APPROVAL  
(CHAPTER 42.24 RCW)

I, the undersigned, do hereby certify under penalty of perjury for the following vouchers, that the materials have been furnished, the services rendered or the labor performed as described herein and that the claim is a just, due and unpaid obligation against Pullman Community Montessori, and that I am authorized to authenticate and certify so said claim.

Pullman Community Montessori General Fund

November AP register totaling: \$68,241.30

Pay dates within 11/01/23 – 11/30/23

Board Date 12/19/23

\_\_\_\_\_  
Signature of Auditing Officer

\_\_\_\_\_  
Date

**Pullman Community Montessori  
Payroll Summary**

**Nov-23**



**Pay Code Totals**

Custodian / Bus Driver	4,931.20
Kitchen Staff	7,699.76
Office Administration	9,578.31
School Administration	15,008.34
Special Education Staff	6,594.51
Student Support Staff	42,129.67
Substitute Teacher	1,673.22
Teacher	26,590.83
<b>Total</b>	<b>114,205.84</b>

**Deduction Totals**

State Pension	7,877.77
State Employees Benefits Board	1,880.50
Supplemental LTD	382.68
Wage Garnishments	-
Federal Income Tax	7,296.76
Social Security	3,001.87
Medicare	1,628.69
WA CARES	662.35
WA Workers' Comp Insurance	480.18
WA Family and Medical Leave Insurance	664.80
<b>Total</b>	<b>23,875.60</b>

**Benefits Totals**

State Pension	11,714.65
State Employees Benefits Board	25,850.00
Social Security	3,001.87
Medicare	1,628.69
WA SUI	222.91
WA EAF	27.87
WA Family and Medical Leave Insurance	-
WA Workers' Comp Insurance	969.87
<b>Total</b>	<b>43,415.86</b>

<b>Direct Deposit Total</b>	<b><u>90,330.24</u></b>
<b>Manual Checks Total</b>	<b><u>-</u></b>



**Payroll Check Summary**

*Payroll Runs: 11/10/2023 and 11/25/2023*

**BOARD CERTIFICATION STATEMENT**

Payments have been audited and certified by the Auditing Officer as required by RCW 42.24.080, and those expense reimbursement claims certified as required by RCW 42.24.090. Those payments have been recorded on a listing which has been made available to the board.

As of December 19, 2023, the Board, by a \_\_\_\_\_ vote, approves payments totaling \$90,330.24. The payments are further identified in this document.

Total Payment by Type:

Payroll Direct Deposit (\$90,330.24)

Manual Checks (\$0)

Secretary	<u>Dorrie Main</u>	Board Member	_____
Board Member	<u>Anna Burton</u>	Board Member	_____
Board Member	<u>Aubree Guyton</u>	Board Member	_____
Board Member	<u>Beverley Wolff</u>		

**Accounts Payable Register**

*November 2023*

**BOARD CERTIFICATION STATEMENT**

Payments have been audited and certified by the Auditing Officer as required by RCW 42.24.080, and those expense reimbursement claims certified as required by RCW 42.24.090. Those payments have been recorded on a listing which has been made available to the board.

As of December 19, 2023, the Board, by a \_\_\_\_\_ vote, approves payments totaling \$68,241.30. The payments are further identified in this document.

Total Payment by Type:

Electronic Funds Transfer (\$68,241.30)

Manual checks (\$0)

Secretary	<u>Dorrie Main</u>	Board Member	_____
Board Member	<u>Anna Burton</u>	Board Member	_____
Board Member	<u>Aubree Guyton</u>	Board Member	_____
Board Member	<u>Beverley Wolff</u>		



**Non-AP Cash Disbursement Register**

*November 2023*

**BOARD CERTIFICATION STATEMENT**

The following payments were paid during November 2023 but not captured in the AP register. This mostly includes debit card payments, certain EFT payments, manual checks, and private wires.

Payments have been audited and certified by the Auditing Officer as required by RCW 42.24.080, and those expense reimbursement claims certified as required by RCW 42.24.090. Those payments have been recorded on a listing which has been made available to the board.

As of December 19, 2023, the Board, by a \_\_\_\_\_ vote, approves payments totaling \$7,029.49. The payments are further identified in this document.

**Total Payment by Type:**

Debit Card / EFT (\$1,901.37) – comprised mostly of automatic charges (Gusto – payroll provider, Verizon, Microsoft) and  
 Manual Checks (\$5,128.12)

Secretary	<u>Dorrie Main</u>	Board Member	_____
Board Member	<u>Anna Burton</u>	Board Member	_____
Board Member	<u>Aubree Guyton</u>	Board Member	_____
Board Member	<u>Beverley Wolff</u>		



**For the Board Minutes**

The following payments as audited and certified by the auditing officer, as required by RCW 42.24.080, and those expense reimbursements claims certified, as required by RCW 42.24.090, are approved for payment. In addition, payroll payments in the amount of \$90,330.24 are also approved.

**General Fund  
Accounts Payable**

Total electronic payments totaling \$50,384.80 and  
Check numbers 1095 and 1096 totaling \$17,856.50

**Non-AP Cash Disbursements**

Total electronic payments totaling \$1,901.37 and  
Check numbers 1061, 1062, 1073, and 1094 totaling \$5,128.12

**Payroll**

Total electronic payments totaling \$90,330.24 and  
Payroll check numbers N/A totaling \$0



**Finance Dashboard**  
November 2023

	<b>Metric</b> <i>Description</i>	<b>Result</b>	<b>Goal</b>	<b>Status</b>	<b>Notes</b>
1.	<b>Current Student Recruitment Count</b> <i>Enrollment is the school's primary revenue driver</i>	86%	100%	●	<i>Current enrollment: 113 (AAFTE: 118.3) Budget: 136 SPED: 20.4 budget, 31 actual</i>
2.	<b>Public Revenue Received as a % of overall budget</b> <i>Measures rate of receipt of public funds to date</i>	19%	22%	●	<i>Enrollment revenue loss will hit in Jan; Title/TBIP applications not completed</i>
3.	<b>Private Revenue Received as a % of overall budget</b> <i>Measures progress against fundraising goals</i>	66%	66%	●	<i>All expected grant payments received. Includes - local fundraising goal (\$25k)</i>
4.	<b>Expenditures to date as a % of overall budget</b> <i>Measures actual spending against planned spending</i>	28%	25%	●	<i>Reasonable due to beginning of year purchases; need cuts or add't revenue due to enrollment loss</i>
5.	<b>Cash on Hand</b> <i>Measures operational and financial stability</i>	Current: \$284k	\$450k	●	<i>Not projected to meet 30 days cash. Projection: \$127k (30 days: \$222k)</i>

**Additional notes for discussion:**

- **Cash:** updated forecasts show cash conservation measures needed starting in January; additional revenue or cuts needed
- **Enrollment:** December enrollment? Post-break estimate?
- **Raza update?**
- **Forecast updates:** increased tech support \$5k (\$6.3k YTD); added BoardOnTrack (\$10K); increased school meals \$23k based on YTD costs and increased Federal meals revenue \$9k (net budget increase of \$14k); lowered transpo costs \$9k (any missing receipts/costs?);
- Current fiscal year count of missing documentation: \$22k

jg<sup>P</sup>



# Coversheet

## 2024-25 Enrollment Policy & Procedures

**Section:** V. Other Business  
**Item:** A. 2024-25 Enrollment Policy & Procedures  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** PCM Enrollment Policy & Procedures (2024-25).docx

### BACKGROUND:

Appropriate date modifications and small immaterial changes have been made to update to the 2023-24 Enrollment Policy & Procedure Manual to be ready for the 2024-25 SY.

### RECOMMENDATION:

**Proposed Motion:** I motion to approve the 2024-25 Policy and Procedures as presented.



# PULLMAN PUBLIC COMMUNITY FREE MONTESSORI K-9

## ENROLLMENT POLICY AND PROCEDURES

(20243-254)

Pullman Community Montessori (PCM) is a public school (tuition-free, not for profit, open enrollment) accessible to all students. Pursuant to Washington State law, PCM may not limit admission on any basis other than age, grade level, or enrollment capacity in a grade level and must enroll all students who apply within these parameters. If capacity within a grade level is insufficient to enroll all students who apply, enrollment will be determined by lottery as described later in this document.

PCM's model is personalized to students' needs and prepares them—through rigorous academics, a robust social-emotional program, and career and life skill development—to ensure every student has the opportunity, skills, and mindset to be successful in college, career, and life. We rely on a data-driven, developmental, place-based Montessori program to achieve this goal and retain students love of learning. We are deeply committed to guiding students to be self-empowered lifelong learners, global citizens, environmental stewards, and compassionate and collaborative leaders, bringing positive changes to their communities and the world!

PCM actively engages families from Pullman and surrounding communities to consider our program. All PCM staff work diligently to ensure that all students have equal opportunity to apply to and be enrolled at PCM. We encourage families to read and understand our PCM Community Handbook and schedule a school tour before enrolling to ensure families fully understand the choice they are making to partner with the school.

### ENROLLMENT PROCEDURES

#### Receipt and processing of enrollment forms

Families may submit enrollment forms via our online enrollment platform Transparent Classroom. A link to this program is on the homepage of our website and is also available on the enrollment tab along the top of the page. Families will be required to establish a Transparent Classroom account and will use this platform for all other enrollment processes.

Families who do not have internet access, or the ability to complete the application process on their own, are encouraged to call the main office of the school and PCM staff will assist them with setting up an account online and getting their student registered. Paper copies of the application form have been translated into the top three languages (Arabic, Mandarin, Spanish) represented in our community and will be distributed during community events, enrollment fairs, and are available in the main office for families who need/prefer them. Please contact the main office if translation to another language is preferred.

If a receipt of enrollment confirmation is not received within 24 hours, families should contact the main office.

PCM will provide ample time and opportunity to families to elect to enroll in PCM. The only admissions protocol is that families wishing to attend PCM must follow enrollment procedures and deadlines for submitting forms and materials.

PCM's enrollment window will open from ~~November-December~~ 1, 202~~23~~ through March ~~27~~~~30~~, 202~~34~~. The table below outlines critical deadlines for the enrollment and lottery process.

Summary of Key Enrollment and Lottery Dates	
Event	Deadline
Enrollment application made public	<del>November-December</del> 1, 202 <del>32</del>
Enrollment application due	March <del>27</del> <del>9</del> , 202 <del>34</del> , 4:00 PM
Public lottery (if needed)	March <del>28</del> <del>30</del> , 202 <del>43</del> <i>Gladish Community and Cultural Center View Room, 5:00 PM</i>
School notifies admitted students by	<del>April 1, 2023</del> March <del>29</del> , 202 <del>4</del> , 4:00 PM
Intent to Enroll form due	April 13, 202 <del>34</del> , 4:00 PM
1 <sup>st</sup> Part of Registration packet due	May 6, 202 <del>43</del> , 4:00 PM
<b>Conversion to <i>Rolling Enrollment</i> if waitlist is empty AND space is available within a given grade level.</b>	

### Lottery

**Should there be more applicants than seats available within a given grade band**, PCM will hold a public admissions lottery on March ~~30~~~~28~~, 202~~43~~ in accordance with Washington State law. In this situation, new enrollment in PCM will be determined by lottery. Families are not required to attend but the process is open to the entire public. For transparency purposes, PCM will secure a neutral, non-affiliated observer to oversee the random lottery process for PCM admission.

**As required by Washington State law, the school will give an enrollment preference to siblings of already enrolled students** (detail provided in the Enrollment Preferences section). After the lottery is complete, all parents will be notified of the results by 4:00 PM ~~March~~April ~~29~~, 202~~34~~.

**After parents have been notified their student has a seat in the school, they will have until 4:00 PM on April 13, 202~~34~~ to submit an Intent to Enroll form.** Between ~~April 1<sup>st</sup>~~March ~~29~~~~th~~ to April 13<sup>th</sup>, PCM will attempt to verify personally with each parent, by phone or at home, if they intend to accept a seat at the school and encourage them to submit their Intent to Enroll form by the deadline. If PCM is unsuccessful in contacting the family for verification, the family will then give up the seat and be placed on the waitlist. If there are still seats available after the Intent to Enroll Form deadline, PCM will begin accepting students on the waitlist. After all seats

have been assigned, the waitlist will be utilized for the remaining students who have registered in the event that a seat should open up. In all cases, PCM will adhere to any and all schedules and requirements pursuant to Washington State law concerning the recruitment and enrollment of students.

Families who've submitted an Intent to Enroll form will receive an e-mail with instructions on what Registration Packet materials are due by May 6, 2024~~3~~ and how to create a Skyward account with PCM. Registration Packet materials are submitted through Skyward. If materials are needed in a language other than English, families can inform the main office and materials will be translated to the desired language.

The first set of registration paperwork is due May 6, 2023~~4~~ by 4:00 PM. Between April 13<sup>th</sup> and May 6<sup>th</sup>, PCM will attempt to verify submission of all Registration Packet material, by phone or at home, and encourage parents to submit their materials by the deadline. If PCM is unsuccessful in contacting the family and does not receive the ~~XXX~~Registration Packet materials by the deadline, the family will then give up the seat and be placed on the waitlist.

If there are still seats available after April 13<sup>th</sup>, PCM will begin accepting students on the waitlist. After all seats have been assigned, the waitlist will be utilized for the remaining students who complete an enrollment request in the event that a seat should open up. In all cases, PCM will adhere to any and all schedules and requirements pursuant to Washington State law concerning the recruitment and enrollment of students.

**If capacity is not reached by the Application deadline on March 29<sup>th</sup>, students will be enrolled to the school on a rolling basis.** If and when the number of students surpasses the number of seats, students that submit an application after capacity is reached will be added to a waitlist in the order that the school receives their application.

**PCM does not discriminate in any programs or activities** on the basis of sex, race, creed, religion, color, national origin, age, veteran or military status, sexual orientation, gender expression or identity, disability, or the use of a trained guide dog or service animal. PCM's "Discrimination/Harassment Policy" complies with the requirements of Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Educational Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, the Individuals with Disabilities Education Act of 1990, and other applicable federal and state laws.

### Enrollment Preferences

**Guiding principles behind PCM's opt-in enrollment preferences.** PCM's Board of Trustees and staff are committed to equal access regardless of a student's race, socio-economic status, or level of academic skill. We believe all students should be enculturated in an environment of high expectations and prepared through rigorous, whole-child education. Our recruitment efforts and the following lottery preferences help support our commitment to ensure our student population reflects the racial, ethnic, and socioeconomic demographic makeup of our local

schools and that at-risk student populations receive ample opportunity to attend PCM. All preferences are subject to authorizer approval.

As allowed by Washington State law, PCM will grant the following enrollment preferences as approved by its authorizer (the Washington State Charter School Commission) and any other guiding bodies.

### **1. Siblings of currently enrolled students (ALL public schools hold this preference)**

- These students will receive an absolute preference and will automatically be offered a spot in the school if space is available in the grade level. If space is not available, the program will randomize all siblings in the same grade level and generate a sibling waitlist for the next available seat.
- Siblings who are newly attending PCM together will only generate a preference after one of the siblings is selected during the lottery process of that school year.
- Siblings of students who have graduated from PCM, or left the school, will not be granted a “legacy” preference, or a preference for having a sibling who has previously attended.

#### **Sibling Definition:**

A sibling is defined at PCM, in regard to enrollment, as two or more individuals having one or both legal parents/guardians in common. Students who are being fostered by a family will not be granted the sibling preference until legal guardianship has been awarded to the family. Due to its impact in our lottery, families may be asked to verify a sibling relationship between two individuals. If it is later found that no relationship exists, the students involved would be moved to the bottom of our waitlist and their seats would be offered to the next students on the waitlist. If a family refuses to submit documentation to allow us to verify, the preference will be withheld until such documentation is presented to the school.

Students who do not qualify for the sibling definition will all be placed in a lottery for enrollment for the remaining available seats in each grade level. Some students will receive a preference in the lottery if they meet one of the criteria mentioned below. All applicants who do not qualify for a preference on the list below will have their names entered once in the lottery. **For a point of clarification, the list below are preferences and DO NOT guarantee enrollment at PCM, the preferences simply increase the likelihood of a student being selected in the general lottery if one is required.**

### **2. Students of PCM staff**

- Children (in legal custody) of contracted full-time staff members will be given an 8:1 preference in the lottery. This decision was made by PCM’s Board of Trustees to show good faith in our program and to reduce the logistical challenges of staff members with children trying to match schedules of schools with different lengths of day and

school year. In addition, it aligns to our goal of having staff representative of the anticipated student population.

### 3. Students from economically disadvantaged families

- Economically disadvantaged family will be defined, for this purpose, as families who qualify for federal free or reduced-price meals. Students fitting this description by the deadline will be given a 5:1 preference in the lottery.
  - To be considered, this status needs to be indicated on the application materials submitted by the Application Submission deadline. Status will be confirmed via a completed and approved Meal Application form submitted in the summer prior to the beginning of the school year.

All preferences will be based on information provided to PCM on the original enrollment application. Any family that omits information that would have qualified them for a preference prior to the lottery running will be subject to the general lottery and will not receive that preference after the enrollment window closes. Any family found to have submitted false information in order to gain a preference in the lottery will lose their spot and opportunity for enrollment during the upcoming school year. All applicants who do not qualify for a preference will have their name entered once in the lottery for consideration.

## LOTTERY PROCESS

The Lottery will be governed by the following rules:

- I. All students who fit the criteria, as established by Washington State law, who applied during the open enrollment window, and who do not qualify for the sibling definition, are placed in the lottery for either available seats or to be on a waitlist if no seats are currently available.
- II. Preferences will be determined based on information received in the student's application to the school.
- III. The Head of School at PCM will run the lottery and will generate enrollment lists. A representative from our Board of Trustees and a neutral, non-affiliated observer, will be present to observe the lottery to ensure accuracy and fairness.
- IV. After the available slots are filled, the school's enrollment platform will develop waitlists with the remaining students in each grade level.
- V. If, following the lottery, it is identified that families have submitted false information to gain an advantage in the lottery, or admission to PCM outside of the aforementioned age/grade guidelines, that student will be removed from PCM and their application will no longer be valid for the school year. The family may reapply in a subsequent year.

## Notification and Acceptance

Families will be notified of the official results following the lottery through ~~the account they set up in Transparent Classroom email~~ and/or a phone call.

Families will have eight (8) days following the lottery notification to accept their offer for enrollment by submitting an Intent to Enroll form (April 13<sup>th</sup> by 4:00 PM). During the days leading up to this deadline, PCM will attempt to verify personally with each family via Transparent Classroom and phone whether they are accepting the offer and enrolling their child at our school. If we are unsuccessful in contacting the family for verification during that 8-day window, we will then offer that student's seat to the next student on the waitlist at by 4:00 PM on April 14<sup>th</sup>.

### Waitlist

After all seats have been assigned, a waitlist will be established for the remaining students who have registered in the event that a seat should open up. Once the lottery is complete, PCM will no longer accept applications on a rolling basis. The only exception to this would be if a grade level was not full, we didn't have students on a waitlist for that grade, and we decided to reopen the window.

### MOVEMENT ON THE WAITLIST

The waitlist for each respective grade level will be created immediately following the lottery process for all applicants who did not receive a spot at PCM during the lottery. When spots become available in a grade level, the first waitlisted student will be called and offered the spot. This family will have until 4:00 PM on the third (3<sup>rd</sup>) day following the offer to accept the spot before it is offered to the next student on the list. **Waitlists for PCM will not carry over from school year to school year. If a family is on the waitlist from a previous school year, they will need to reapply for the following school year.**

### WITHDRAWAL AND RE-ENROLLMENT

If a student formally withdraws from PCM at any point following registration, they can only be readmitted by resubmitting an application during an open-enrollment period. Such student(s) will be placed at the bottom of the waitlist upon expressing a desire to re-register.

### STUDENT WITHDRAWAL AND TRANSFERS

**Withdrawal:** If a parent wishes to withdraw or transfer a student from the school, it is the parent's responsibility to notify the Head of School. In some cases, the Head of School may want to meet with the student's parents as well. In addition, the student must follow the returning student policy if they wish to return to the school. Students will not receive official transcripts until all school materials are returned and any fees are paid. PCM will offer to conduct exit interviews with families to collect feedback and data about withdrawal reasons.

**Transfer:** The school will NOT restrict the ability of parents/guardians to exit a particular school, apply for admission at any other school, enroll at another school, or maintain a waitlist slot at another school.

## HOMELESS STUDENTS

The McKinney-Vento Homeless Assistance Act for Homeless Children and Youth entitles all homeless school-aged children to the same free and appropriate public education that is provided to non-homeless students. A homeless student is defined as a person between the ages of two and eighteen who lacks a fixed, regular, and adequate nighttime residence and may:

- Live in an emergency or transitional shelter; abandoned building, parked car, or other facility not designed as a regular sleeping accommodation for human beings.
- Live “double-up” with another family, due to loss of housing stemming from financial problems (e.g., loss of job, eviction or natural disaster).
- Live in a hotel or motel.
- Live in a trailer park or campsite with their family
- Have been abandoned at a hospital.
- Be awaiting foster placement in limited circumstances.
- Reside in a home for school-aged, unwed mothers or mothers-to-be if there are no other available living accommodations.
- Be a migratory or abandoned, runaway, or throwaway youth that qualifies as homeless because they are living in circumstances described above.

The law requires the immediate enrollment of homeless students. PCM will not delay or prevent the enrollment of a student due to the lack of school or immunization records. It is the responsibility of the new school to request all necessary documents from the previous school and refer parents to all programs and services for which the student is eligible.

## GRADE PLACEMENT UPON ENROLLMENT

Montessori groups students into developmentally appropriate age groupings as follows:

Developmentally Appropriate Age Groupings		
Age grouping	Grade	Typical Age
<b>Stand-Alone Kindergarten</b>	K	5-6 years old
<b>Lower Elementary</b>	1 <sup>st</sup> – 3 <sup>rd</sup>	6-9 years old
<b>Upper Elementary</b>	4 <sup>th</sup> – 6 <sup>th</sup>	9-12 years old
<b>Adolescent Community Program</b>	7 <sup>th</sup> – 9 <sup>th</sup>	12-15 years old

PCM uses evaluations combined with age to determine grade designation. PCM conducts academic diagnostics on all students who are enrolling for the first time. Following these assessments, students age will be considered. These metrics will help to ensure the student is placed in the appropriate age grouping and assigned the appropriate grade designation. This information is never used to screen a student's fit for the PCM program, only to identify the appropriate grade designation for the student.

### Kindergarten:

Students wishing to enter the lottery for kindergarten **must turn five (5) years old on or before August 31<sup>st</sup>**. If a student is accepted during the lottery and it is discovered during the



enrollment process that the student's birthday does not meet this requirement, that student will lose their spot and will need to reapply for the following school year.

Students who have already successfully completed kindergarten at a different school may be allowed or asked to repeat kindergarten at PCM based on their observed level of readiness during the first three (3) weeks of school.

Some districts offer the opportunity for four-year-olds to 'prove their ability' to enroll in kindergarten early through testing. We do not participate in this practice at PCM.

### Grade Skipping:

Students will not be allowed to skip a grade between their previous school and attending PCM. For example, if a student completes 4<sup>th</sup> grade at their previous school and applies for 6<sup>th</sup> grade at PCM, PCM staff would instead enroll that student in 5<sup>th</sup> grade, if room is available in that grade level.

### Age Range Guidance: What grade level to apply to

Students may not be more than one year older than a typical student in a grade level. For example, a student typically turns the age of 12 at some point during ~~his/her~~their 6<sup>th</sup> grade year. PCM would accept an application for a 6<sup>th</sup> grader turning 13 during the school year, but not 14, regardless of the circumstances. This student would be asked to apply to 7<sup>th</sup> grade instead.

### STATEMENT OF NONDISCRIMINATION

PCM shall not discriminate in any programs or activities or against any student, employee, or any other person on the basis of age, sex, race, creed, belief system/religion, color, marital-partnership status, status as a victim of domestic violence, national origin, alienage or citizenship status, veteran or military status, sexual orientation, gender expression, gender identity, the presence of any sensory, mental, or physical disability, or the use of a trained dog guide or service animal, and provides equal access to the Boy Scouts and other designated youth groups. Furthermore, PCM shall not discriminate on any other ground that would be unlawful if done by any other public school. PCM shall take all steps necessary to ensure that discrimination does not occur, as required by state and federal civil rights, and anti-discrimination laws.

For any questions, concerns, or to report violations, please contact one of the following coordinators:

- Title IX/Sex Equity Officer & HIB Compliance Coordinator/Officer - ~~Laylah Sullivan~~  
- ~~L~~Sullivan@myPCM.org Jared Kuhn - JaredK@mypcm.org
- Gender Inclusive School Coordinator - Laylah ~~Sullivan-Bewick~~  
- ~~L~~Sullivan@myPCM.org LaylahB@myPCM.org
- Civil Rights Compliance Coordinator - Jill Stansbury - Jills@myPCM.org
- Section 504 & IEP Program Manager - Emily Klein - EmilyK@myPCM.org
- Homeless/McKinney Vento Liaison - ~~Desiree Porter~~Michael Mol-Fuller  
- DesireeP@myPCM.org MichaelM@myPCM.org

- State Assessment Coordinator - Laylah ~~Sullivan~~ Bewick  
- ~~L~~Sullivan@myPCM.org LaylahB@myPCM.org

# Coversheet

## Policy & Procedure Updates: Harassment, Intimidation and Bullying of Students (3207/3207P)

**Section:** V. Other Business  
**Item:** B. Policy & Procedure Updates: Harassment, Intimidation and Bullying of Students (3207/3207P)  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 3207P HIB procedure.docx  
3207 HIB .docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

#### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Harassment, Intimidation and Bullying of Students (3207/3207P).

**Description of Changes:** The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 5010 and 5010P as presented.



**POLICY #3207P**

**Prohibition of Harassment, Intimidation and Bullying Procedure**

**Adopted** – 11/2023

**Last Revised** – PCM: 5/2021, WSSDA: 8/2019

**Prior Revised Dates** – WSSDA: 4/2002, 4/2008, 12/2010, 12/2011, 12/2014, 01/2015, 07/2019, 07/2023

**A. Introduction**

The Pullman Community Montessori (PCM) school strives to provide students with optimal conditions for learning by maintaining a school environment where every student is treated with respect and students are not physically or emotionally harmed.

In order to ensure respect, prevent harm, and improve school climate, it is a violation of school policy for a student to be harassed, intimidated, or bullied by other student in the school community, at school sponsored events, or when such actions create a substantial disruption to the educational process. Student(s) will not be harassed because of their race, color, religion, ancestry, national origin, gender, sexual orientation, gender expression, gender identity, mental or physical disability, or other distinguishing characteristics.

Any school staff who observes, overhears, or otherwise witnesses harassment, intimidation, or bullying of a student or to whom such actions have been reported must take prompt and appropriate action to stop the harassment, intimidation, or bullying, prevent its reoccurrence, and report it to the building level administrator and/or School HIB Compliance Officer.

**B. Definitions**

**Aggressor** means a student who harasses, intimidates, or bullies another student.

**Harassment, intimidation, or bullying** means an intentional electronic, written, verbal, or physical act that:

1. Physically harms a student or damages the student’s property;
2. Has the effect of substantially interfering with a student’s education;
3. Is so severe, persistent, or pervasive that it creates an intimidating or threatening educational environment; or
4. Has the effect of substantially disrupting the orderly operation of the school.

Conduct that is “substantially interfering with a student’s education” will be determined by considering a targeted student’s grades, attendance, demeanor, interaction with peers, participation in activities, and other indicators.



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42 Conduct that may rise to the level of harassment, intimidation, or bullying may take many forms,  
 43 including, but not limited to: slurs, rumors, jokes, innuendoes, demeaning comments, drawings,  
 44 cartoons, pranks, ostracism, physical attacks or threats, gestures, or acts relating to an individual or  
 45 group whether electronic, written, oral, or physically transmitted messages or images. There is no  
 46 requirement that the targeted student actually possess the characteristic that is the basis for the  
 47 harassment, intimidation, or bullying.

48

49 This procedure does not govern harassment, intimidation, or bullying toward or by an employee,  
 50 volunteer, parent/legal guardian, or community member.

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52 **Retaliation** occurs when a student is intimidated, threatened, coerced, or discriminated against for  
 53 reporting harassment, intimidation, or bullying, participating in an investigation, or being identified as a  
 54 targeted student.

55

56 **Staff** includes, but is not limited to, educators, administrators, counselors, school nurses, cafeteria  
 57 workers, custodians, bus drivers, athletic coaches, advisors to extracurricular activities, classified staff,  
 58 substitute and temporary teachers, volunteers, or paraprofessionals (both employees and contractors).

59

60 **Targeted Student** means a student against whom harassment, intimidation, or bullying has allegedly  
 61 been perpetrated.

62

63 **Complainant** means the person who has reported the harassment, intimidation, or bullying.

64

### 65 C. Behaviors/Expressions

66 "Harassment," "intimidation," and "bullying" are separate but related behaviors directed toward students.  
 67 Although this procedure defines the three behaviors, this differentiation should not be considered part  
 68 of the legal definition of these behaviors. RCW 28A.600.477 presents HIB as a broad and inclusive term  
 69 and it is not meant to place undue emphasis on whether the behavior is "harassment," or "intimidation,"  
 70 or "bullying."

71

72 Harassment refers to any malicious act, which causes harm to any student's physical well being. It can  
 73 be discriminatory harassment, malicious harassment, or sexual harassment. Intimidation refers to  
 74 implied or overt threats of physical violence toward a student. Bullying refers to unwanted aggressive  
 75 behavior(s) by a student or group of students toward another student and that involves an observed or  
 76 perceived power imbalance and is repeated multiple times or is highly likely to be repeated. Bullying  
 77 may inflict harm on the targeted student including physical or educational harm. Bullying can also occur  
 78 through technology and is called electronic bullying or cyberbullying.

79

80 It is considered a violation of the state HIB law if any of the above behaviors are occurring.

81



82 **D. Relationship to Other Laws**

83 This procedure applies only to conduct toward students as reflected in RCW 28A.600.477 –  
 84 Prohibition of Harassment, Intimidation and Bullying. There are other laws and procedures to  
 85 address related issues such as sexual harassment or discrimination.

86  
 87 At least four Washington laws may apply to harassment or discrimination:

- 88 1. RCW 28A.600.477 – Prohibition Harassment, Intimidation and Bullying
- 89 2. [RCW 28A.640.020 – Sexual Equality](#)
- 90 3. [RCW 28A.642 – Prohibition of Discrimination in Public Schools](#)
- 91 4. [RCW 49.60.010 – The Law Against Discrimination](#)

92  
 93 The School will ensure its compliance with all state laws regarding harassment, intimidation, or bullying  
 94 of a student. Nothing in this procedure prevents a student, parent/guardian, school or School from  
 95 taking action to remediate harassment or discrimination based on a student’s membership in a legally  
 96 protected class under local, state, or federal law.

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 98 **E. Prevention**

99 1. **Dissemination**

100 In each school and on the School’s website, the School will prominently post  
 101 information, as provided by OSPI, on reporting harassment, intimidation, or bullying; the  
 102 name and contact information for making a report to a school administrator; and the  
 103 name and contact information for the School HIB Compliance Officer. The School’s policy  
 104 and procedure will be available in each school in a language that families can  
 105 understand.

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 107 Annually, the Head of School will ensure that language provided by OSPI summarizing the policy and  
 108 procedure is provided in student, staff, volunteer, and parent handbooks, is available in school and  
 109 School offices and/or hallways, and is posted on the School’s website.

110  
 111 Additional distribution of the policy and procedure is subject to the requirements of chapter 392-405  
 112 WAC.

113 2. **Education**

114 Annually, students will receive age-appropriate information on the recognition and prevention  
 115 of harassment, intimidation, or bullying at student orientation sessions and on other appropriate  
 116 occasions. The information will include a copy of the Incident Reporting Form or a link to a web-  
 117 based process.

118 3. **Training**

119 The School HIB Compliance Officer will participate in at least one mandatory training  
 120 opportunity offered by OSPI. As feasible, the School’s HIB Compliance Officer will attend annual  
 121 training as a refresher course, particularly in the event that changes to the HIB law or process  
 122 occur. Staff will receive annual training on the school School’s policy and procedure, including at  
 123 a minimum, staff roles and responsibilities, and the use of the School’s Incident Reporting Form.



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2. **Prevention Strategies**

The School will implement a range of prevention strategies including individual, classroom, school, and School-level approaches.

Whenever possible, the School will implement evidence-based prevention programs that are designed to increase social competency, improve school climate, and eliminate harassment, intimidation, and bullying in schools.

F. **Compliance Officer**

The School compliance officer will:

1. Serve as the School's primary contact for harassment, intimidation, or bullying of a student. If any School staff member receives allegations in a written report of harassment, intimidation, or bullying that indicate a potential violation of Policy 3207, that staff member must promptly notify the School compliance officer;
2. Provide support and assistance to the principal or designee in resolving complaints;
3. Receive copies of all Incident Reporting Forms, discipline Referral Forms, and letters to parents providing the outcomes of investigations;
4. Communicate with the school School's designated civil rights compliance coordinator. If a written report of harassment, intimidation, or bullying of a student indicates a potential violation of the School's nondiscrimination policy [Policy 3210], or if during the course of an investigation, the School becomes aware of a potential violation of the School's nondiscrimination policy, the compliance officer must promptly notify the School's civil rights compliance coordinator. At that time, the compliance officers must promptly notify the complainant that their complaint will proceed under both this policy/procedure and the nondiscrimination policy/procedure. The investigation and response timeline for the nondiscrimination procedure begin when the school School knows or should have known that a written report or investigation or harassment, intimidation, or bullying involves a potential violation of the School's nondiscrimination policy;
5. Be familiar with the use of the student information system. The compliance officer may use this information to identify patterns of behavior and areas of concern;
6. Ensure implementation of the policy and procedure by overseeing the investigative processes, including ensuring that investigations are prompt, impartial, and thorough;
7. Assess the training needs of staff and students to ensure successful implementation throughout the School, and ensure staff receive annual training;
8. Provide the OSPI School Safety Center with notification of policy or procedure updates or changes on an annual basis; and
9. In cases where, despite school efforts, a targeted student experiences harassment, intimidation, or bullying that threatens the student's health and safety, the compliance officer will facilitate a meeting between School staff and the child's parents/guardians to develop a safety plan to protect the student. A sample student safety plan is available on the OSPI website: [www.k12.wa.us/SafetyCenter/default.aspx](http://www.k12.wa.us/SafetyCenter/default.aspx).





165 10. The School will provide updated names and contact information to OSPI after a change  
 166 of the School's HIB Compliance Officer.

167 **G. Staff Intervention**

168 All staff members will intervene and report when witnessing or receiving reports of harassment,  
 169 intimidation, or bullying of a student. Incidents that do not meet the definition of harassment,  
 170 intimidation, or bullying, or conduct not directed toward a student may require no further action  
 171 under this procedure, other than tracking, to ensure they are not repeated.

172

173 **H. Filing an Incident Reporting Form**

174 Incident Reporting Forms may be used by students, families, or staff to report incidents of  
 175 harassment, intimidation or bullying of a student. A sample form is provided on the Office of  
 176 Superintendent of Public Instruction's (OSPI) School Safety Center website:

177 [www.k12.wa.us/SafetyCenter/BullyingHarassment/default.aspx](http://www.k12.wa.us/SafetyCenter/BullyingHarassment/default.aspx)

178

179 Any student or students who believe they have been the target of unresolved, severe, or persistent  
 180 harassment, intimidation, or bullying, or any other person in the school community who observes or  
 181 receives notice that a student has or may have been the target of unresolved, severe, or persistent  
 182 harassment, intimidation, or bullying may report incidents verbally or in writing to any staff member.

183

184 The School must provide an incident report form to students, families, or staff, if requested.

185

186 **I. Addressing Harassment, Intimidation, or Bullying – Reports**

187 **Step 1: Filing an Incident Reporting Form**

188 In order to protect a targeted student from retaliation, a student need not reveal their identity on an  
 189 Incident Reporting Form. The form may be filed anonymously, confidentially, or the student may choose  
 190 to disclose their identity (non-confidential).

191

192 **Status of Reporter**

193

194 **1. Anonymous**

195 Individuals may file a report without revealing their identity. No disciplinary action will be taken  
 196 against an alleged aggressor based solely on an anonymous report. Schools may identify  
 197 complaint boxes, use online reporting processes, or develop other methods for receiving  
 198 anonymous, unsigned reports. Possible responses to an anonymous report include enhanced  
 199 monitoring of specific locations at certain times of day or increased monitoring of specific  
 200 students or staff. (Example: An unsigned Incident Reporting Form dropped on a teacher's desk  
 201 led to the increased monitoring of the boys' locker room in 5th period.)

202

202 **2. Confidential**

203 Individuals may ask that their identities be kept secret from the accused and other students. Like  
 204 anonymous reports, no disciplinary action will be taken against an alleged aggressor based  
 205 solely on a confidential report. (Example: A student tells a playground supervisor about a  
 206 classmate being bullied but asks that nobody know who reported the incident. The supervisor



207 says, "I won't be able to punish the bullies unless you or someone else who saw it is willing to let  
 208 me use their names, but I can start hanging out near the basketball court, if that would help.")

209 3. **Non-confidential**

210 Individuals may agree to file a report non-confidentially. Complainants agreeing to make their  
 211 complaint non-confidential will be informed that due process requirements may require that the  
 212 School release all of the information that it has regarding the complaint to any individuals  
 213 involved in the incident, but that even then, information will still be restricted to those with a  
 214 need to know, both during and after the investigation. The School will, however, fully implement  
 215 the anti-retaliation provision of this policy and procedure to protect complainants and  
 216 witnesses.

217  
 218 **Step 2: Receiving an Incident Reporting Form**

219 All staff are responsible for receiving oral and written reports. Whenever possible staff who initially  
 220 receive an oral or written report of harassment, intimidation, or bullying of a student will attempt to  
 221 resolve the incident immediately. If the incident is resolved to the satisfaction of the parties involved, if  
 222 the incident does not meet the definition of harassment, intimidation, or bullying, or if the conduct is  
 223 not directed toward a student, no further action may be necessary under this procedure. If the parties  
 224 involved are not satisfied with the attempt to resolve the situation, the staff member will notify the HIB  
 225 Compliance Officer, the parties will be provided with a HIB Incident Report form, and given the  
 226 opportunity to complete the form, thereby initiating the process for an official HIB investigation.

227  
 228 All reports of unresolved, severe, or persistent harassment, intimidation, or bullying of a student will be  
 229 recorded on a School Incident Reporting Form and submitted to the principal or designee, once  
 230 recorded, the principal or designee must communicate with the School HIB Compliance Officer  
 231 regarding the complaints.

232  
 233 **Step 3: Investigations of Unresolved, Severe, or Persistent Harassment, Intimidation and Bullying**

234 All reports of unresolved, severe, or persistent harassment, intimidation, or bullying of a student will be  
 235 investigated with reasonable promptness. Any student may have a trusted adult with them throughout  
 236 the report and investigation process.

- 237 1. Upon receipt of the Incident Reporting Form that alleges unresolved, severe, or persistent  
 238 harassment, intimidation, or bullying of a student, the school or School designee will begin the  
 239 investigation. If there is potential for clear and immediate physical harm to the complainant, the  
 240 School will immediately contact law enforcement and inform the parent/guardian.
- 241 2. For allegations involving a staff member the Human Resources Department must be involved so  
 242 union representatives can be notified. These allegations will not be handled under the processes  
 243 in 3207 and 3207P. Human Resources Departments must include consideration of policy and  
 244 procedure 3210 – Nondiscrimination of Students, policy and procedure 5010 –  
 245 Nondiscrimination and Affirmative Action, and other applicable policies and laws, including WAC  
 246 392-190-0555. The Human Resources Departments should work with their legal services to  
 247 determine the appropriate complaint process and response.



248 3. During the course of the investigation, the School will take reasonable measures to ensure that  
 249 no further incidents of harassment, intimidation, or bullying occur between the complainant,  
 250 targeted student, and the alleged aggressor. If necessary, the School will implement a safety  
 251 plan ([https://www.k1wa.us/student-success/health-safety/school-safety-center/safety-planning-](https://www.k1wa.us/student-success/health-safety/school-safety-center/safety-planning-toolkit)  
 252 [toolkit](https://www.k1wa.us/student-success/health-safety/school-safety-center/safety-planning-toolkit)) for the student(s) involved. The plan may include changing seating arrangements for the  
 253 complainant, targeted student, and/or the alleged aggressor in the classroom, at lunch, or on  
 254 the bus; identifying a staff member who will act as a safe person for the complainant; altering  
 255 the alleged aggressor's schedule and access to the complainant, and other measures.

256  
 257 If, during the course of an investigation, the School employee conducting the investigation  
 258 becomes aware of a potential violation of the School's nondiscrimination policy [Policy 3210],  
 259 the investigator will promptly notify the School's civil rights compliance officer. Upon receipt of  
 260 this information, the civil rights compliance officer must notify the complainant that their  
 261 complaint will proceed under the discrimination complaint procedure in WAC 392-190-065  
 262 through WAC 392-190-075 as well as the HIB complaint procedure. The notice must be provided  
 263 in a language that the complainant can understand. The investigation and response timeline for  
 264 the discrimination complaint procedure will follow that set forth in WAC 392-190-065 and  
 265 begins when the School knows or should have known that a written report of harassment,  
 266 intimidation or bullying involves allegations of a violation of the School's nondiscrimination  
 267 policy.

268 4. Within two (2) school days after receiving the Incident Reporting Form, the school designee will  
 269 notify the families of the students involved that a complaint was received and direct the families  
 270 to the School's policy and procedure on harassment, intimidation and bullying.

271 5. In rare cases, where after consultation with the student and appropriate staff (such as a  
 272 psychologist, counselor, or social worker) the School has evidence that it would threaten the  
 273 health and safety of the complainant or the alleged aggressor to involve his or her  
 274 parent/guardian, the School may initially refrain from contacting the parent/guardian in its  
 275 investigation of harassment, intimidation, or bullying of a student. If professional school  
 276 personnel suspect that a student is subject to abuse and neglect, they must follow School policy  
 277 for reporting suspected cases to Child Protective Services.

278 6. The investigation will include, at a minimum:  
 279 a. An interview with the complainant;  
 280 b. An interview with the targeted student, if different than the complainant;  
 281 c. An interview with the alleged aggressor;  
 282 d. A review of any previous complaints involving the complainant, the targeted student, or  
 283 the alleged aggressor; and  
 284 e. Interviews with other students or staff members who may have knowledge of the alleged  
 285 incident.

286 7. The principal or designee may determine that other steps must be taken before the  
 287 investigation is complete.

288 8. The investigation will be completed as soon as practicable but generally no later than five (5)  
 289 school days from the initial complaint or report. If more time is needed to complete an



290 investigation, the School will provide the parent/guardian and/or the student with weekly  
 291 updates.

292 9. No later than two (2) school days after the investigation has been completed and submitted to  
 293 the compliance officer, the principal or designee will respond in writing or in person to the  
 294 parent/guardian of the complainant and the alleged aggressor stating:

- 295 a. The results of the investigation;
- 296 b. Whether the allegations were found to be factual;
- 297 c. Whether there was a violation of policy; and
- 298 d. The process for the complainant to file an appeal if the complainant disagrees with the  
 299 results.

300 Because of the legal requirement regarding the confidentiality of student records, the principal or  
 301 designee may not be able to report specific information to the targeted student's parent/guardian  
 302 about any disciplinary action taken unless it involves a directive that the targeted student must be  
 303 aware of in order to report violations.

304  
 305 If a School chooses to contact the parent/guardian by letter, the letter will be mailed to the  
 306 parent/guardian of the complainant and alleged aggressor by United States Postal Service with return  
 307 receipt requested unless it is determined, after consultation with the student and appropriate staff  
 308 (psychologist, counselor, social worker) that it could endanger the complainant or the alleged aggressor  
 309 to involve his or her family. If professional school personnel suspect that a student is subject to abuse or  
 310 neglect, as mandatory reporters they must follow School policy for reporting suspected cases to Child  
 311 Protective Services.

312  
 313 If the incident cannot be resolved at the school level, the principal or designee will request assistance  
 314 from the HIB compliance officer.

315

#### 316 **Step 4: Corrective Measures for the Aggressor**

317 After completion of the investigation, the school or School designee will institute any corrective  
 318 measures necessary. Corrective measures will be instituted as quickly as possible, but in no event more  
 319 than five (5) school days after contact has been made to the families or guardians regarding the  
 320 outcome of the investigation. Corrective measures that involve student discipline will be implemented  
 321 according to [School policy 3241](#), Student Discipline. If the accused aggressor is appealing the  
 322 imposition of discipline, the School may be prevented by due process considerations or a lawful order  
 323 from imposing the discipline until the appeal process is concluded.

324

325 If in an investigation a principal or principal's designee found that a student knowingly made a false  
 326 allegation of harassment, intimidation or bullying, that student may be subject to corrective measures,  
 327 including discipline.

328

#### 329 **Step 5: Complainant's Right to Appeal**

330 1. If the complainant or parent/guardian is dissatisfied with the results of the investigation, they  
 331 may appeal to the Head of School or their designee by filing a written notice of appeal within



- 332 five (5) school days of receiving the written decision. The Head of School or their designee will  
 333 review the investigative report and issue a written decision on the merits of the appeal within  
 334 five (5) school days of receiving the notice of appeal.
- 335 2. If the complainant remains dissatisfied after the initial appeal to the Head of School, the student  
 336 may appeal to the school board by filing a written notice of appeal with the secretary of the  
 337 school board on or before the fifth (5) school day following the date upon which the  
 338 complainant received the Head of School's written decision.
- 339 3. An appeal before the school board or disciplinary appeal council must be heard on or before the  
 340 tenth (10th) school day following the filing of the written notice of appeal to the school board.  
 341 The school board or disciplinary appeal council will review the record and render a written  
 342 decision on the merits of the appeal on or before the fifth (5th) school day following the  
 343 termination of the hearing, and will provide a copy to all parties involved. The board or council's  
 344 decision will be the final School decision.

#### 345 **Step 6: Discipline/Corrective Action**

346 The School will take prompt and equitable corrective measures within its authority on findings of  
 347 harassment, intimidation or bullying of a student. Depending on the severity of the conduct, corrective  
 348 measures may include counseling, education, discipline, and/or referral to law enforcement.

349 Corrective measures for a student who commits an act of harassment, intimidation, or bullying will be  
 350 varied and graded according to the nature of the behavior, the developmental age of the student, or  
 351 the student's history of problem behaviors and performance. Corrective measures that involve student  
 352 discipline will be implemented according to [School policy and procedure 3241, Student Discipline](#).

353 If the conduct was of a public nature or involved groups of students or bystanders, the School should  
 354 strongly consider schoolwide training or other activities to address the incident.

355 If staff have been found to be in violation of this policy and procedure by not reporting harassment,  
 356 intimidation, or bullying or not preventing retaliation, school Schools may impose employment  
 357 disciplinary action, up to and including termination. If a certificated educator is found to have  
 358 committed a violation of [WAC 181-87](#), commonly called the Code of Conduct for Professional  
 359 Educators, OSPI's Office of Professional Practices may propose disciplinary action on a certificate, up to  
 360 and including revocation. Contractor violations of this policy may include the loss of contracts.

#### 361 **Step 7: Support for the Targeted Student**

362 Students found to have been subjected to harassment, intimidation or bullying will have appropriate  
 363 School support services made available to them, and the adverse impact of the harassment on the  
 364 student will be addressed and remedied as appropriate.

#### 365 **J. Immunity/Retaliation**

366 No school employee, student, or volunteer may engage in reprisal or retaliation against a  
 367 targeted student, witness, or other person who brings forward information about an alleged act  
 368



374 of harassment, intimidation or bullying of a student. Retaliation is prohibited and will result in  
 375 appropriate discipline.

376

377 **K. Other Resources**

378 Students and families should use the School's complaint and appeal procedures as a first  
 379 response to allegations of harassment, intimidation, or bullying of a student. However, nothing  
 380 in this procedure prevents a student, parent/guardian, school, or School from taking action to  
 381 remediate discrimination or harassment based on a person's membership in a legally protected  
 382 class under local, state or federal law.

383 **L. For questions or more information, students and families can reach out to the following**  
 384 **state or federal agencies:**

385

386

- 387 • OSPI Equity and Civil Rights Office (for discrimination complaints)

388 360.725.6162

389 Email: [equity@k12.wa.us](mailto:equity@k12.wa.us)

390 <https://www.k12.wa.us/policy-funding/equity-and-civil-rights>

- 391 • Washington State Human Rights Commission

392 800.233.3247

393 [www.hum.wa.gov/index.html](http://www.hum.wa.gov/index.html)

- 394 • Office for Civil Rights, U.S. Department of Education, Region IX

395 206.607.1600

396 Email: [OCR.Seattle@ed.gov](mailto:OCR.Seattle@ed.gov)

397 [www.ed.gov/about/offices/list/ocr/index.html](http://www.ed.gov/about/offices/list/ocr/index.html)

- 398 • Department of Justice Community Relations Service

399 877.292.3804

400 [www.justice.gov/crt/](http://www.justice.gov/crt/)

- 401 • Office of the Education Ombuds

402 866.297-2597

403 Email: [OEInfo@gov.wa.gov](mailto:OEInfo@gov.wa.gov)

404 <http://oeo.wa.gov/>

- 405 • OSPI Safety Center

406 Email: [Schoolsafety@k12.wa.us](mailto:Schoolsafety@k12.wa.us)

407 360.725-6068

408 <https://www.k12.wa.us/student-success/health-safety/school-safety-center>

409

410 **M. Other School Policies and Procedures**

411 Nothing in this policy or procedure is intended to prohibit discipline or remedial action for  
 412 inappropriate behaviors that do not rise to the level of harassment, intimidation, or bullying as defined  
 413 in this procedure but which are, or may be, prohibited by other School or school rules.

414



**POLICY #3207**

**Prohibition of Harassment, Intimidation, and Bullying of Students**

**Adopted** – 11/2023

**Last Revised** – PCM: 5/2021, WSSDA: 8/2019

**Prior Revised Dates** – WSSDA: 4/2002, 10/2007, 4/2008, 12/2010, 12/2011, 12/2013, 12/2014, 01/2015, 7/2019

The Pullman Community Montessori (PCM) school board is committed to a safe and civil educational environment that is free from harassment, intimidation, or bullying of any student. As defined in Chapter 28A.600 RCW (Students), “Harassment, intimidation or bullying” means any intentional electronic, written, verbal, or physical act including but not limited to, one shown to be motivated by any characteristic in RCW 28A.640.010 and RCW 28A.642.010, or other distinguishing characteristics, when the act:

- A. Physically harms a student or damages the student’s property;
- B. Has the effect of substantially interfering with a student’s education;
- C. Is so severe, persistent, or pervasive that it creates an intimidating or threatening educational environment; or
- D. Has the effect of substantially disrupting the orderly operation of the school.

Nothing in this section requires the affected student to actually possess a characteristic that is a basis for the harassment, intimidation or bullying.

“Other distinguishing characteristics” can include but are not limited to physical appearance, clothing or other apparel, socioeconomic status and weight.

“Intentional acts” refers to the individual’s choice to engage in the act rather than the ultimate impact of the action(s).

This policy and accompanying procedure do not govern harassment, intimidation, or bullying of an employee, volunteer, parent/legal guardian, or community member.

**Behaviors/Expressions**

This policy recognizes that ‘harassment,’ ‘intimidation,’ and ‘bullying’ are separate but related behaviors towards a student.. Each must be addressed appropriately. The accompanying procedure differentiates the three behaviors, however, this differentiation should not be considered part of the legal definition of these behaviors.



40 Harassment, intimidation, or bullying can take many forms including, but not limited to, slurs, rumors,  
 41 jokes, innuendoes, demeaning comments, drawings, cartoons, pranks, gestures, physical attacks, threats  
 42 or other written, oral, physical or electronically transmitted messages or images directed toward a  
 43 student.

44  
 45 This policy is not intended to prohibit expression of religious, philosophical, or political views, provided  
 46 that the expression does not substantially disrupt the educational environment. Many behaviors that do  
 47 not rise to the level of harassment, intimidation, or bullying may still be prohibited by other school  
 48 policies or building, classroom or program rules.

49

#### 50 **Training**

51 This policy is a component of PCM's responsibility to create and maintain a safe, civil, respectful and  
 52 inclusive learning community for students and will be implemented in conjunction with comprehensive  
 53 training of staff and volunteers. Specific training requirements are included in the accompanying  
 54 procedure.

55

#### 56 **Prevention**

57 The school will provide students with strategies aimed at preventing harassment, intimidation, and  
 58 bullying toward students.. In its efforts to train students, the school will seek partnerships with families,  
 59 law enforcement, and other community agencies.

60

#### 61 **Interventions**

62 Interventions are designed to remediate the impact on the targeted student(s) and others impacted by  
 63 the violation, to change the behavior of the aggressor, and to restore a positive school climate. The  
 64 school will consider the frequency of incidents, developmental age of the student, and severity of the  
 65 conduct in determining intervention strategies. Interventions will range from counseling, correcting  
 66 behavior and discipline, to law enforcement referrals.

67

#### 68 **Students with Individual Education Plans or Section 504 Plans**

69 If allegations are proven that a student with an Individual Education Plan (IEP) or Section 504 Plan has  
 70 been the aggressor or target of harassment, intimidation or bullying, the school will convene the  
 71 student's IEP or Section 504 team to determine whether the incident had an impact on the student's  
 72 ability to receive a free, appropriate public education (FAPE). The meeting should occur regardless of  
 73 whether the harassment, intimidation, or bullying incident was based on the student's disability. During  
 74 the meeting, the team will evaluate issues such as the student's academic performance, behavioral  
 75 issues, attendance, and participation in extracurricular activities. If a determination is made that the  
 76 student is not receiving a FAPE as a result of the harassment, intimidation, or bullying incident, the  
 77 school will provide additional services and supports as deemed necessary, such as counseling,  
 78 monitoring and/or reevaluation or revision of the student's IEP or Section 504 plan, to ensure the  
 79 student receives a FAPE.

80

#### 81 **Retaliation/False Allegations**





82 Retaliation is prohibited and will result in appropriate discipline. It is a violation of this policy to threaten  
 83 or harm a student for reporting harassment, intimidation, or bullying, being identified as a targeted  
 84 student, or participating in an investigation.

85

86 It is also a violation of school policy to knowingly report false allegations of harassment, intimidation,  
 87 and bullying. Students or employees who knowingly report or corroborate false allegations will be  
 88 subject to appropriate discipline. However, students, or employees will not be disciplined for making a  
 89 report in good faith.

90

91 **Compliance Officer**

92 The superintendent will appoint a compliance officer as the primary school contact to receive copies of  
 93 all formal and informal complaints and oversee policy implementation. The name and contact  
 94 information for the compliance officer will be communicated throughout the school. The school  
 95 compliance officer will participate in at least one mandatory training opportunity offered by OSPI.

96

97 The Head of School is authorized to direct the implementation of procedures addressing the elements  
 98 of this policy.

99

100

101 Legal References:

102

102 [WAC 392-190-059 Harassment, intimidation and bullying prevention policy and procedure – School districts.](#)

103

103 [RCW 28A.300.285 Harassment, intimidation, and bullying prevention policies and procedures — Model policy and procedure — Training materials — Posting on web site — Rules — Advisory committee](#)

104

105

106 Cross References:

107

107 [2161 - Special Education and Related Services for Eligible Students](#)

108

108 [3205 - Sexual Harassment of Students Prohibited](#)

109

109 [3210 - Nondiscrimination](#)

110

110 [3211 - Gender-Inclusive Schools](#)

111

111 [3241 - Student Discipline](#)

112

# Coversheet

## Policy & Procedure Updates: Nondiscrimination and Affirmative Action (5010/5010P)

**Section:** V. Other Business  
**Item:** C. Policy & Procedure Updates: Nondiscrimination and Affirmative Action (5010/5010P)  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 5010 Nondiscrimination and Affirmative Action.docx  
5010P\_Nondiscrimination\_and\_Affirmative\_Action\_Procedure.docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

#### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Nondiscrimination and Affirmative Action (5010/5010P).

**Description of Changes:** This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 5010 and 5010P as presented.



**POLICY #5010**

**Nondiscrimination and Affirmative Action**

**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 1/2021

**Prior Revised Dates** – WSSDA: 7/2023, 5/2018, 4/2017, 12/2014, 6/2013, 6/2011, 2/2011, 6/2001, 12/2000

**Nondiscrimination**

Pullman Community Montessori School is committed to an educational and working environment free from discrimination and harassment as described in this policy. This policy and accompanying procedure prohibits discrimination and harassment of any staff member, volunteers, and contractors who work on behalf of the district.

**Equal Employment Opportunity**

Pullman Community Montessori School will provide equal employment opportunity and treatment for all applicants and staff in recruitment, hiring, retention, assignment, transfer, promotion and training. Such equal employment opportunity will be provided without discrimination with respect to a legally protected characteristic, which include the following: race, creed, religion, color, national origin, age, honorably-discharged veteran or military status, sex, sexual orientation including gender expression or identity, marital status, disability, or the use of a trained dog guide or service animal by a person with a disability.

**Discriminatory Harassment**

Discriminatory harassment is unwelcome conduct that is:

1. Directed toward a person based on a protected characteristic,
2. Sufficiently severe or pervasive;
3. Unreasonably interferes with a person’s work environment or ability to perform job duties; and
4. The cause of an intimidating, hostile, or offensive environment.

Examples of discriminatory harassment include, but are not limited to:

- Unwelcome jokes or comments about a legally protected characteristic (e.g., racial or ethnic jokes);
- Disparaging remarks to or about a person’s legally protected characteristic (e.g., negative or offensive remarks or jokes about a person's religion or religious garments);
- Displaying negative or offensive posters or pictures about a legally protected characteristic;
- Physical conduct toward a person due to that person’s legally protected characteristic;
- All communications, including those conveyed electronically, such as by e-mail, telephone or voicemail, text messaging, or social media or other internet use, that directly or indirectly implicates a legally protected characteristic; or



- 42 • Any other unwelcome conduct that implicated a legally protected characteristic.

43

44 In most instances, discriminatory harassment does not include supervisory or evaluative practices.

45

46 The board will designate a staff member to serve as the compliance officer.

47

#### 48 **Affirmative Action**

49 The School, as a recipient of public funds, is committed to undertake affirmative action which will make  
 50 effective equal employment opportunities for staff and applicants for employment. Such affirmative  
 51 action will include a review of programs, the setting of goals and the implementation of corrective  
 52 employment procedures to increase the ratio of aged, persons with disabilities, ethnic minorities,  
 53 women, and Vietnam veterans who are under-represented in the job classifications in relationship to  
 54 the availability of such persons having requisite qualifications. Affirmative action plans may not include  
 55 hiring or employment preferences based on gender or race, including color, ethnicity or national origin.  
 56 Such affirmative action will also include recruitment, selection, training, education and other programs.

57

58 The Head of School will develop an affirmative action plan which specifies the personnel procedures to  
 59 be followed by the staff of the school and will ensure that no such procedures discriminate against any  
 60 individual. Reasonable steps will be taken to promote employment opportunities of those classes that  
 61 are recognized as protected groups — aged, persons with disabilities, ethnic minorities and women and  
 62 Vietnam veterans, although under state law, racial minorities, and women may not be treated  
 63 preferentially in public employment.

64

65 This policy, as well as the affirmative action plan, regulations and procedures developed according to it,  
 66 will be disseminated widely to staff in all classifications and to all interested patrons and organizations.  
 67 Progress toward the goals established under this policy will be reported annually to the board.

68

#### 69 **Employment of Persons with Disabilities**

70 In order to fulfill its commitment of nondiscrimination to those with disabilities, the following conditions  
 71 will prevail:

72

73 1. No qualified person with disabilities will, solely by reason of a disability, be subjected to  
 74 discrimination and the School will not limit, segregate or classify any applicants for employment  
 75 or any staff member in any way that adversely affects his/her opportunities or status because of  
 76 a disability. This prohibition applies to all aspects of employment from recruitment to  
 77 promotions, and includes fringe benefits and other elements of compensation.

77

78 2. The School will make reasonable accommodation to the known physical or mental limitations of  
 79 an otherwise qualified disabled applicant or staff member unless it is clear that an  
 80 accommodation would impose an undue hardship on the operation of the school program.  
 81 Such reasonable accommodations may include:

82



83 a. Making facilities used by staff readily accessible and usable by persons with disabilities; and

84

85 b. Job restructuring, part-time or modified work schedules, acquisition or modification of equipment  
86 or devices, the provision of readers or interpreters and other similar actions.

87

88 In determining whether or not accommodation would impose an undue hardship on the School, factors  
89 to be considered include the nature and cost of the accommodation.

90

91 3. The School will not use any employment tests or criteria that screen out persons with disabilities  
92 unless the test or criteria is clearly and specifically job-related. Also, the School will not use such  
93 tests or criteria if alternative tests or criteria (that do not screen out persons with disabilities) are  
94 available.

95

96 4. While the School may not make pre-employment inquiry as to whether an applicant has a  
97 disability or as to the nature and severity of any such disability, it may inquire into an applicant's  
98 ability to perform job-related functions.

99

100 5. Any staff member who believes that there has been a violation of this policy or the law  
101 prohibiting discrimination because of a disability may initiate a grievance through the  
102 procedures for staff complaints.

103

104 **Nondiscrimination for Military Service**

105 The School will not discriminate against any person who is a member of, applies to be a member or  
106 performs, has performed, applies to perform or has an obligation to perform service in a uniformed  
107 service, on the basis of that participation in a uniformed service. This includes initial employment,  
108 retention in employment, promotion or any benefit of employment. The School will also not  
109 discriminate against any person who has participated in the enforcement of these rights under state or  
110 federal law.

111

112

113 School Compliance Officers: Laylah Sullivan, lsullivan@myPCM.org

114

115 Cross References: [2030 - Service Animals in Schools](#)  
116 [5407 - Military Leave](#)

117

118 Legal References: [RCW 28A.400.310 Law against discrimination applicable to districts' employment](#)  
119 [practices](#)

120 [RCW 28A.640.020 Regulations, guidelines to eliminate discrimination — Scope —](#)  
121 [Sexual harassment policies](#)

122 [RCW 28A.642 Discrimination prohibition](#)

123 [RCW 49.60 Discrimination — Human rights commission](#)

124 [RCW 49.60.030 Freedom from discrimination — Declaration of civil rights](#)



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- 125 [RCW 49.60.180 Unfair practices of employers](#)
- 126 [RCW 49.60.400 Discrimination, preferential treatment prohibited](#)
- 127 [RCW 73.16 Employment and Reemployment](#)
- 128 [WAC 392-190 Equal Education Opportunity – Unlawful Discrimination Prohibited](#)
- 129 [WAC 392-190-0592 Public school employment — Affirmative action program](#)
- 130 [42 USC §§2000e1 – 2000e10 Title VII of the Civil Rights Act of 1964](#)
- 131 [20 USC §§1681 - 1688 Title IX Educational Amendments of 1972](#)
- 132 [42 USC 12101 – 12213 Americans with Disabilities Act](#)
- 133 [8 USC §1324 \(IRCA\) Immigration Reform and Control Act of 1986](#)
- 134 [38 USC §§ 4301-4333 Uniformed Services Employment and Reemployment Rights](#)
- 135 [Act](#)
- 136 [29 USC§ 794 Vocational Rehabilitation Act of 1973](#)
- 137 [34 CFR § 104 Nondiscrimination on the basis of handicap in Programs or activities](#)
- 138 [receiving federal financial assistance](#)
- 139 [38 USC §4212 Vietnam Era Veterans Readjustment Assistance Act of 1974](#)
- 140 [\(VEVRAA\)](#)



**Procedure for POLICY #5010  
Nondiscrimination and Affirmative Action**

**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 2/2023, WSSDA: 12/2015

**Prior Revised Dates** – WSSDA: 6/1997, 6/2011, 4/2015, 7/2023

**Nondiscrimination**

To ensure fairness and consistency, the following grievance procedure is to be used in the LEA’s relationship with its staff members, volunteers, or contractors who work on behalf of the LEA. It specifically governs employment problems covered by state and federal equal employment opportunity laws and/or this affirmative action program. No such person’s status with the LEA will be adversely affected in any way because the staff member utilized these procedures. As used in this procedure, “grievance” will mean a complaint which has been filed by a complainant relating to alleged violations of any state or federal anti-discrimination laws. A “complaint” will mean a charge alleging specific acts, conditions or circumstances which are in violation of the anti-discrimination laws. A “respondent” will mean the person alleged to be responsible or who may be responsible for the violation alleged in the complaint.

The primary purpose of this procedure is to secure an equitable solution to a justifiable complaint to this and the following steps will be taken:

**Affirmative Action Plan**

In order to secure an equitable solution to a justifiable complaint the LEA will:

1. Make efforts to modify the composition of the future work force in order to work toward a full utilization of aged persons, persons with disabilities, racial and ethnic minorities, women, and Vietnam veterans in the various job categories.
2. Ensure that all applicants and staff are considered on the basis of bona fide job-related qualifications. The purpose of the affirmative action plan is to actively include persons of under-utilized classes in the employment process, not to exclude others from it. The LEA will continue to emphasize in all recruitment contacts that nondiscrimination is a basic element in the LEA’s personnel procedures.
3. Be responsible for reviewing all employment procedures and programs to assure that there is no indication of discriminatory practices. The LEA will continue to use aged persons, persons with disabilities, racial and ethnic minorities, women and Vietnam veterans in the recruitment and employment process. Job descriptions for classified staff will be sent to the Washington Employment Service and other organizations which are recruiting sources for groups that may





41 be under-utilized in the LEA's work force. Recruitment from colleges and universities will include  
 42 institutions with high percentages of students of various ethnic minorities.

43

44 4. Contract and purchase all goods and services from persons, agencies, vendors, contractors, and  
 45 organizations who comply with the appropriate laws and executive orders regarding  
 46 discrimination.

47

48 5. Take appropriate action to attract and retain aged persons, persons with disabilities, racial and  
 49 ethnic minorities, women and Vietnam Veterans at all levels and in all segments of the LEA's  
 50 work force. Criteria for selecting staff will be reviewed regularly to assure that such statements  
 51 relate directly to the requirements for specific positions. However, pursuant to state law there  
 52 will be no preferential employment practices based on race or gender.

53

54 6. Upgrade present staff by providing management development training to assure that  
 55 individuals of under-utilized groups are prepared for positions of new and increased  
 56 responsibility.

57

58 Implementation of the affirmative action plan will be the responsibility of the superintendent.

59 Administrators will assist in the attainment of the established goals and purposes of this affirmative  
 60 action plan.

61

### 62 **Dissemination**

63 The LEA will disseminate information concerning employment and developments under the affirmative  
 64 action plan on a planned basis to assist in achieving the goals set forth in this plan. Affirmative action  
 65 information will be disseminated by:

66

67 1. Printing and distributing such information to staff, school libraries, and offices;

68

69 2. Publicizing such information in LEA newsletters;

70

71 3. Conducting meetings with administrative staff to explain the intent and advantages of the policy  
 72 and plan;

73

74 4. Conducting faculty meetings and meetings with classified staff;

75

76 5. Informing appropriate and interested recruiting and hiring sources; and

77

78 6. Informing all representative staff groups in the LEA.

79

### 80 **Male/Female Balance and Staff Goals**

81 The profile of the LEA's current utilization of women is set forth in Board Dashboard. By the  
 82 commencement of the 2022-23 school year, the LEA will strive to achieve a rate of employment in



83 regard to sex at least equivalent to the goals set forth in the Board Dashboard. The LEA will see that  
 84 measurable efforts are made in the utilization of women for higher levels of responsibility in both  
 85 certificated and classified positions. The LEA will make good faith effort to recruit, interview, and employ  
 86 individuals consistent with the LEA commitment to nondiscrimination and affirmative action for all  
 87 positions and in every department, school, and level of operation. Preferential or adverse employment  
 88 practices, including demotions or termination will not be used to meet stated goals or time lines.

89  
 90 **1. Administrators**

91 **Goal:** To place females in administrative positions.

92 **Objectives:** To place females in administrative positions as they become available which falls  
 93 within a range of 50% men and/or women, without using preferential employment practices.

94  
 95 To identify qualified potential candidates from outside the LEA for consideration for future  
 96 openings.

97  
 98 **2. Principals and Assistant Principals**

99 **Goal:** To place females in principal positions.

100 **Objective:** To place females in principal and assistant principal positions as they occur and  
 101 trained women are available, without using preferential employment practices.

102  
 103 **3. Teachers, Elementary or grades K-8**

104 **Goal:** To provide each student with the opportunity to experience both male and female  
 105 homeroom teachers during the primary as well as the intermediate grades.

106 **Objective:** To achieve a staff which falls within a range of 50% men and/or women in the  
 107 primary as well as the intermediate grades at each school, without using preferential  
 108 employment practices.

109  
 110 **4. Teachers, Secondary or grades 9-12**

111 **Goal:** To provide students with the opportunity to work with male and female staff in both  
 112 curricular and extracurricular activities.

113 **Objective:** To maintain a staff which falls within a range of 50% men and/or women for  
 114 classroom teachers and activity supervisors, without using preferential employment practices.

115  
 116 **5. Support Staff — Certificated and Classified**

117 **Objective:** To achieve a staff which falls within a range of 50% men and/or women, without  
 118 using preferential employment practices.

119  
 120 **Racial and Ethnic Minority Balance and Staff Goals**

121 The profiles of the LEA's current student ethnic minority population and the LEA's current ethnic  
 122 minorities (American Indian/ Native American, Asian, Black, and Hispanic) are set forth in Board  
 123 Dashboard. By the commencement of the 2023-24 school year the LEA will strive to achieve a rate of  
 124 employment for ethnic minorities in both certificated and classified areas as indicated in this plan,



125 without using preferential employment practices. These goals are a utilization level for certificated staff,  
 126 at least equal to the percentage of ethnic minority student enrollment within the LEA; for classified staff  
 127 a utilization level of at least 27% is estimated based upon relevant availability figures in the  
 128 demographic data statistical area. Final and interim goals are set out in the Board Dashboard ethnic  
 129 minority student population at the LEA. The LEA will see that measurable efforts are made in the  
 130 utilization of ethnic minorities for higher levels of responsibility in both certificated and classified  
 131 positions, without using preferential employment practices. The LEA will make good faith effort to  
 132 recruit, interview, and employ individuals consistent with the LEA commitment to nondiscrimination and  
 133 affirmative action for all positions and in every department, every school and at every level of operation.  
 134 Preferential or adverse employment practices, including demotions or termination will not be used to  
 135 meet stated goals or time lines.

136  
 137 **1. Administrators**

138 **Goal:** To place ethnic minorities in administrative positions, without using preferential  
 139 employment practices.

140 **Objectives:** To place ethnic minorities in administrative positions as they become available to  
 141 progress toward the percentage of ethnic minorities in the current ethnic minority student  
 142 enrollment.

143  
 144 To identify qualified potential candidates from outside the LEA for consideration for future  
 145 openings.

146  
 147 **2. Principals and Assistant Principals**

148 **Goal:** To place ethnic minorities in principal positions.

149 **Objective:** To place ethnic minorities in principal and assistant principal positions as they occur  
 150 and trained applicants are available, without using preferential employment practices.

151  
 152 **3. Teachers: Elementary or grades K-8**

153 **Goal:** To provide each student with the opportunity to experience ethnic minority homeroom  
 154 teachers during the primary as well as the intermediate grades, without using preferential  
 155 employment practices.

156 **Objective:** To achieve a staff of primary and intermediate teachers in which the percentage of  
 157 ethnic minorities is comparable to that of the current ethnic minority student enrollment.

158  
 159 **4. Teachers: Secondary or grades 9-12**

160 **Goal:** To provide students with the opportunity to work with ethnic minority staff in both  
 161 curricular and extracurricular activities.

162 **Objective:** To maintain a staff of classroom teachers and activity supervisors in which the  
 163 percentage of ethnic minorities is comparable to that of the current ethnic minority student  
 164 enrollment, without using preferential employment practices.  
 165



166 5. **Support Staff - Certificated and Classified**

167 **Objective:** To achieve a staff of certificated and classified support staff in which the percentage  
 168 of ethnic minorities is comparable to that of the current ethnic minority student enrollment,  
 169 without using preferential employment practices.

170

171 **Internal Audit and Monitoring System**

172 The superintendent's office, in compliance with [WAC 162-12, Pre-employment Inquiry Guide](#), will record  
 173 applicant flow, new hires, promotions, transfer requests, transfers, administrative internships, and  
 174 terminations by age, race, sex, and other protected status. An analysis will be made of the internal and  
 175 external work force availability of racial and ethnic minorities and women.

176

177 The LEA will evaluate the effectiveness of the nondiscrimination and affirmative action program and  
 178 report its status to the board semiannually. Such reports may include recommendations for changes in  
 179 the affirmative action program goals. The overall responsibility for monitoring and auditing this policy is  
 180 assigned to the LEA office. The duties include:

181

- 182 1. Analysis of the categories of employment in relation to affirmative action goals;
- 183
- 184 2. Analysis of work force data and applicant flow;
- 185
- 186 3. Maintaining records relative to affirmative action information;
- 187
- 188 4. Preparation of semiannual reports of progress toward the goals and recommended changes  
 189 required to maintain the vitality of the program;
- 190
- 191 5. Identifying in a written report to the superintendent any employment practice or policy that is  
 192 discriminatory or that does not meet the requirements of the affirmative action program; and
- 193
- 194 6. Keeping the superintendent advised of the progress in implementing the goals and procedures  
 195 of this affirmative action program.
- 196

196

197 **Grievance Procedure**

198 To ensure fairness and consistency, the following review procedures are to be used in the LEA's  
 199 relationship with its staff members, volunteers, or contractors who work on behalf of the LEA. These  
 200 review procedures specifically govern employment problems covered by state and federal equal  
 201 employment opportunity laws and/or this affirmative action program. No such person's status with the  
 202 LEA will be adversely affected in any way because the person utilized these procedures.

203

- 204 1. **Grievance** means a complaint which has been filed by a staff member, volunteer, or contractor  
 205 relating to alleged violations of any state or federal anti-discrimination laws.
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2. **Complaint** means a written charge alleging specific acts, conditions or circumstances, which are in violation of the anti-discrimination laws. The time period for filing a complaint is one year from the date of the occurrence that is the subject matter of the complaint. However, a complaint filing deadline may not be imposed if the complainant was prevented from filing due to: 1) Specific misrepresentations by the LEA that it had resolved the problem forming the basis of the complaint; or 2) Withholding of information that the LEA was required to provide under WAC 392-190-065 or WAC 392-190-005. Complaints may be submitted by mail, fax, e-mail or hand-delivery to any LEA, school or to the LEA compliance officer responsible for investigating discrimination complaints. Any LEA employee who receives a complaint that meets these criteria will promptly notify the compliance officer.
  3. **Respondent** means the person alleged to be responsible or who may be responsible for the violation alleged in the complaint.

221 The primary purpose of this procedure is to secure an equitable solution to a justifiable complaint. To  
 222 this end, specific steps will be taken. The LEA is prohibited by law from intimidating, threatening,  
 223 coercing, or discriminating against any individual for the purpose of interfering with their right to file a  
 224 grievance under this procedure and from retaliating against an individual for filing such a grievance.  
 225

226  
227

1. **Informal Process for Resolution**

228 When a staff member, volunteer, or contractor has an employment problem concerning equal  
 229 employment opportunity, he/she will discuss the problem with the immediate supervisor,  
 230 personnel director or superintendent within 60 days of the circumstances which gave rise to the  
 231 problem. The staff member, volunteer, or contractor may also ask the compliance officer to  
 232 participate in the informal review procedure. It is intended that the informal discussion will  
 233 resolve the issue. If the staff member, volunteer, or contractor feels he/she cannot approach the  
 234 supervisor because of the supervisor's involvement in the alleged discrimination, the person may  
 235 directly contact the compliance officer before pursuing formal procedures. If the discussion with  
 236 the officer or immediate supervisor does not resolve the issue the person may proceed to the  
 237 formal review procedures. During the course of the informal process, the LEA will notify  
 238 complainant of their right to file a formal complaint.

239  
240

2. **Formal Process for Resolution**

241  
242

1. **Level One: Complaint to LEA**

243 The complaint must set forth the specific acts, conditions, or circumstances alleged to be in  
 244 violation. Upon receipt of a complaint, the compliance officer will provide the complainant a  
 245 copy of this procedure. The compliance officer will investigate the allegations within 30 calendar  
 246 days. The school LEA and complainant may agree to resolve the complaint in lieu of an  
 247 investigation. The officer will provide the superintendent with a full written report of the  
 248 complaint and the results of the investigation.



249 The superintendent or designee will respond to the complainant with a written decision as  
 250 expeditiously as possible, but in no event later than 30 calendar days following receipt of the  
 251 written complaint, unless otherwise agreed to by the complainant or if exceptional  
 252 circumstances related to the complaint require an extension of the time limit. In the event an  
 253 extension is needed, the LEA will notify the complainant in writing of the reason for the  
 254 extension and the anticipated response date. At the time the LEA responds to the complainant,  
 255 the LEA must send a copy of the response to the office of the superintendent of public  
 256 instruction.

257  
 258 The decision of the superintendent or designee will include: 1) a summary of the results of the  
 259 investigation; 2) whether the LEA has failed to comply with anti-discrimination laws; 3) if non-  
 260 compliance is found, corrective measures the LEA deems necessary to correct it; and 4) notice of  
 261 the complainant's right to appeal to the school board and the necessary filing information. The  
 262 superintendent's or designee's response will be provided in a language the complainant can  
 263 understand and may require language assistance for complainants with limited English  
 264 proficiency in accordance with Title VI of the Civil Rights Act of 1964.

265  
 266 Any corrective measures deemed necessary will be instituted as expeditiously as possible, but in  
 267 no event later than 30 calendar days following the superintendent's mailing of a written  
 268 response to the complaining party unless otherwise agreed to by the complainant.

269  
 270 **Level Two - Appeal to Board of Directors**

271 If a complainant disagrees with the superintendent's or designee's written decision, the  
 272 complainant may file a written notice of appeal with the secretary of the board within ten (10)  
 273 calendar days following the date upon which the complainant received the response. The board  
 274 will schedule a hearing to commence by the twentieth (20) calendar day following the filing of  
 275 the written notice of appeal unless otherwise agreed to by the complainant and the  
 276 superintendent or for good cause. Both parties will be allowed to present such witnesses and  
 277 testimony as the board deems relevant and material. Unless otherwise agreed to by the  
 278 complainant, the board will render a written decision within thirty (30) calendar days following  
 279 the filing of the notice of appeal and provide the complainant with a copy of the decision. The  
 280 decision of the board will be provided in a language the complainant can understand, which  
 281 may require language assistance for complainants with limited English proficiency in accordance  
 282 with Title VI of the Civil Rights Act. The decision will include notice of the complainant's right to  
 283 appeal to the Office of Superintendent of Public Instruction and will identify where and to whom  
 284 the appeal must be filed. The LEA will send a copy of the appeal decision to the Office of  
 285 Superintendent of Public Instruction.

286  
 287 **Level Three - Complaint to the Superintendent of Public Instruction**

288 If a complainant disagrees with the decision of the board of directors, or if the LEA fails to  
 289 comply with this procedure, the complainant may file a complaint with the Office of



290 Superintendent of Public Instruction.

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1. A complaint must be received by the Office of Superintendent of Public Instruction on or before the twentieth (20) calendar day following the date upon which the complainant received written notice of the board of directors' decision, unless the Office of Superintendent of Public Instruction grants an extension for good cause. Complaints may be submitted by mail, fax, electronic mail, or hand delivery.
2. A complaint must be in writing and include: 1) A description of the specific acts, conditions or circumstances alleged to violate applicable anti-discrimination laws; 2) The name and contact information, including address, of the complainant; 3) The name and address of the LEA subject to the complaint; 4) A copy of the LEA's complaint and appeal decision, if any; and 5) A proposed resolution of the complaint or relief requested. If the allegations regard a specific student, the complaint must also include the name and address of the student, or in the case of a homeless child or youth, contact information.
3. Upon receipt of a complaint, the Office of the Superintendent of Public Instruction may initiate an investigation, which may include conducting an independent on-site review. OSPI may also investigate additional issues related to the complaint that were not included in the initial complaint or appeal to the superintendent or board. Following the investigation, OSPI will make an independent determination as to whether the LEA has failed to comply with RCW 28A.642.010 or Chapter 392-190, WAC and will issue a written decision to the complainant and the LEA that addresses each allegation in the complaint and any other noncompliance issues it has identified. The written decision will include corrective actions deemed necessary to correct noncompliance and documentation the LEA must provide to demonstrate that corrective action has been completed.

All corrective actions must be completed within the timelines established by OSPI in the written decision unless OSPI grants an extension. If timely compliance is not achieved, OSPI may take action including but not limited to referring the LEA to appropriate state or federal agencies empowered to order compliance.

A complaint may be resolved at any time when, before the completion of the investigation, the LEA voluntarily agrees to resolve the complaint. OSPI may provide technical assistance and dispute resolution methods to resolve a complaint.

#### **Level Four - Administrative Hearing**

A complainant or school LEA that desires to appeal the written decision of the Office of the Superintendent of Public Instruction may file a written notice of appeal with OSPI within thirty (30) calendar days following the date of receipt of that office's written decision. OSPI will conduct a formal administrative hearing in conformance with the Administrative Procedures Act, Chapter 34.05, RCW.



332 3. **Mediation**

333 At any time during the discrimination complaint procedure set forth in WAC 392-190-065  
 334 through 392-190-075, a LEA may, at its own expense, offer mediation. The complainant and the  
 335 LEA may agree to extend the discrimination complaint process deadlines in order to pursue  
 336 mediation.

337  
 338 The purpose of mediation is to provide both the complainant and the LEA an opportunity to  
 339 resolve disputes and reach a mutually acceptable agreement through the use of an impartial  
 340 mediator. Mediation must be voluntary and requires the mutual agreement of both parties. It  
 341 may be terminated by either party at any time during the mediation process. It may not be used  
 342 to deny or delay a complainant's right to utilize the complaint procedures.

343  
 344 Mediation must be conducted by a qualified and impartial mediator who may not: 1) Be an  
 345 employee of any school LEA, public charter school, or other public or private agency that is  
 346 providing education related services to a student who is the subject of the complaint being  
 347 mediated; or 2) Have a personal or professional conflict of interest. A mediator is not considered  
 348 an employee of the LEA or charter school or other public or private agency solely because he or  
 349 she serves as a mediator.

350  
 351 If the parties reach agreement through mediation, they may execute a legally binding  
 352 agreement that sets forth the resolution and states that all discussions that occurred during the  
 353 course of mediation will remain confidential and may not be used as evidence in any  
 354 subsequent complaint, due process hearing or civil proceeding. The agreement must be signed  
 355 by the complainant, and a LEA representative who has authority to bind the LEA.

356  
 357 4. **Preservation of Records**

358 The files containing copies of all correspondence relative to each complaint communicated to  
 359 the LEA and the disposition, including any corrective measures instituted by the LEA, will be  
 360 retained in the office of the LEA compliance officer for a period of 6 years.

361  
 362 **Resources**  
 363 LEA Contact  
 364 Laylah Bewick, Head of School, [laylahb@myPCM.org](mailto:laylahb@myPCM.org) (509) 336-5909

365  
 366 State Contacts  
 367 Superintendent of Public Instruction  
 368 Equity and Civil Rights Office  
 369 P.O. Box 47200  
 370 Olympia, WA 98504-7200  
 371 360.725.6162

372  
 373 Washington State Human Rights Commission





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- 374 711 South Capitol Way, Suite 402
- 375 P.O. Box 42490
- 376 Olympia, WA 98504-2490
- 377 360.753.6770
- 378
- 379 Office for Civil Rights
- 380 U.S. Department of Education
- 381 915 Second Avenue, Room 3310
- 382 Seattle, WA 98174
- 383 206.607.1600

# Coversheet

## Policy & Procedure Updates: Highly Capable (2190/2190P)

**Section:** V. Other Business  
**Item:** D. Policy & Procedure Updates: Highly Capable (2190/2190P)  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 2190 Highly Capable.docx  
2190P Highly Capable Programs.docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Highly Capable (2190/2190P).

**Description of Changes:** Overall update

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 2190 and 2190P as presented.



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**POLICY #2190  
Highly Capable Programs**

**Adopted** – 11/2023

**Last Revised** – PCM: 06/2021, WSSDA: 11/2023, 07/2023, 08/2018

**Prior Revised Dates** – WSSDA: 4/2008, 12/2011, 9/2013

In order to develop the special abilities of each student, the Pullman Community Montessori (PCM) school will offer a highly capable program that provides kindergarten through ninth grade students who qualify for the program, with access to basic education programs that accelerate learning and enhance instruction. The framework for such programs will encompass, but not be limited to, the following objectives:

1. Expansion of academic attainments and intellectual skills;
2. Stimulation of intellectual curiosity, independence, and responsibility;
3. Development of a positive attitude toward self and others; and
4. Development of originality and creativity.

The board will annually approve the school’s highly capable plan including: the number of students the school expects to serve by grade level; the school’s plan to identify students, including universal screening at two grade levels; a description of the highly capable program goals; a description of the services the program will offer; an instructional program description; a description of ongoing professional development for highly capable program and general education staff; program evaluation and fiscal report; and assurances that the school is legally compliant.

The Head of School and Montessori Coach will establish procedures consistent with state guidelines for implementing universal referral, screening, assessment, identification, and placement of highly capable students. The procedures will include prioritizing equitable identification of low-income students; use of multiple objective criteria and multiple pathways universal screening for identification and placement decisions; use of local norms, unless more restrictive than national norms; and use of screening and assessment in the student’s native language (if available) or nonverbal assessment.

**Legal References:**

- [RCW 28A.185.030 Programs — Authority of local school districts — Selection of students](#)
- [WAC 392-170 Special service program — Highly capable students](#)

**Cross References:** NA



**Procedure for POLICY #2190P  
Highly Capable Programs**

**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 06/2021, WSSDA: 08/2018

**Prior Revised Dates** – WSSDA: 04/2008, 12/2011, 09/2013, 06/2014, 06/2021, 07/2023, 11/2023

**Definition**

Highly capable students are students who perform or show potential for performing at significantly advanced academic levels when compared with others of their age, experiences, or environments.

Highly capable students exhibit outstanding abilities within their general intellectual aptitudes, specific academic abilities, and/or creative productivities within a specific domain. These students are present both in the general populace and within all protected classes.

Students who are highly capable may possess, but are not limited to, these learning characteristics:

1. Capacity to learn with unusual depth of understanding, to retain what has been learned, and to transfer learning to new situations;
2. Capacity and willingness to deal with increasing levels of abstraction and complexity earlier than other peers;
3. Creative ability to make unusual connections among ideas and concepts;
4. Ability to learn quickly in their area(s) of intellectual strength; and
5. Capacity for intense concentration and/or focus.

The Pullman Community Montessori (PCM) school will employ the following procedures to find students who may qualify for potential placement in the program:

**Referral**

PCM will conduct universal screenings at two elementary grade levels to find students who may qualify for potential highly capable program placement. Referrals must be available for all grade levels not being universally screened, and may be submitted by teachers, other staff, parents, students, and members of the community.

**Screening**

The school will select a grade level to implement universal screening procedures for each student. Universal screening must occur once in or before second grade, and again in or before leaving elementary, either fifth or sixth grade. The purpose of universal screening is to include students who traditionally are not referred for highly capable programs and services. Students discovered during universal screening PCM may need further assessment to determine whether the student is eligible for



40 placement in a program for highly capable students. The School will consider at least two student data  
 41 points during universal screening, which may include previously administered objective standardized,  
 42 classroom-based performance, cognitive, or achievement assessments, or research-based behavior  
 43 ratings scales.

44

45 Examples of data include, but are not limited to:

- 46 • MEFS (Minnesota Executive Functioning Scale), a nonverbal measure
- 47 • MAP Growth testing
- 48 • Rubric based assessments of student created projects
- 49 • Ratings and advancement in lessons via Transparent Classroom record keeping system
- 50 • Student Portfolios of Work
- 51 • End of Unit examinations including SBAC

52

### 53 **Assessment**

54 The school will obtain written or electronic parental permission - prior to conducting additional  
 55 assessments to determine eligibility for participation in its Highly Capable (HiCap) Program.

56

57 School practices for identifying the most highly capable students must prioritize equitable identification  
 58 of low-income students.

59

60 PCM will assess students identified for further consideration through the universal screening process  
 61 using multiple objective criteria. PCM must base the assessment process upon a review of each  
 62 student's capability as shown by multiple criteria, from a wide variety of sources and data, intended to  
 63 reveal each student's unique needs and capabilities. The assessment criterion consists of both  
 64 qualitative and quantitative (*LEA may select one or both*) instruments and may include:

65

- 66 • *Teacher observation*
- 67 • *Minimum of five work samples in the relevant content area*
- 68 • *MEFS (Minnesota Executive Functioning Scale) measures*
- 69 • *MAP Growth testing results*
- 70 • *Rubric based assessments of Student created projects*
- 71 • *Ratings and advancement in lessons in the relevant content area via Transparent Classroom*
- 72 • *Record Keeping System*
- 73 • *Student Portfolios of Work*

74

75 The school must have identification procedures for their highly capable programs that are clearly stated  
 76 and implemented by the school using the following criteria:

77

- 78 a) The school must use multiple objective criteria to identify students who are determined to need  
 79 services. Multiple pathways for qualifications must be available and no single criterion may  
 80 disqualify a student from identification;



- 81 b) The school must base highly capable selection decisions on consideration of criteria  
 82 benchmarked on local norms, but the school will not use local norms as a more restrictive  
 83 criterion than national norms at the same percentile.
- 84 c) The school will not use subjective measures, such as teacher recommendations or report card  
 85 grades to screen out a student from assessment or to disqualify a student from identification.  
 86 However, the school may use these data points alongside other criteria during selection to  
 87 support identification; and
- 88 d) To the extent practicable, the school must give screening and assessments in the native  
 89 language of the student. If native language screening and assessments are not available, the  
 90 school must use a nonverbal screening and assessment.

91  
 92 The school will record test results in the student's cumulative file.

93  
 94 Any screenings or additional assessments will be conducted within the school day and at the school the  
 95 student attends. On a case-by-case basis and with the consent of the parent or guardian, the School  
 96 may offer student screenings or additional assessment opportunities during the summer, outside of  
 97 school hours, or at an alternative site.

98  
 99 **Selection**

100 A multi-disciplinary selection committee will be composed of the Head of School and the Director of  
 101 Academic Programs, the SPED teacher and/or other individual who can interpret cognitive and  
 102 achievement test results, and additional professionals which PCM deems appropriate, as well as the  
 103 teachers within and above the grade level. The Selection Committee will review data that has been  
 104 collected for each of the referred students. The multi-disciplinary selection committee is composed of:  
 105 a special teacher (however, if a special teacher is not available, a classroom teacher shall be appointed); a  
 106 psychologist or other qualified practitioner with the training to interpret cognitive and achievement test  
 107 results; a certified coordinator or administrator with the responsibility for the supervision of the School's  
 108 highly capable program; and additional professionals if any, that the school deems desirable.

109  
 110 The multi-disciplinary selection committee will evaluate the results of the universal screening, any  
 111 further individual student assessment, and any available School data and make the selection decision  
 112 based on:

- 113  
 114 1. A preponderance of evidence from the profile data demonstrating that a student requires  
 115 accelerated learning and enhanced instruction; and
- 116  
 117 2. Evidence of clear need for highly capable services.

118  
 119 A single assessment score or indicator will not prevent a student's selection for the HiCap Program;  
 120 however, individual pieces of evidence, if strong enough, can indicate that the student would benefit  
 121 from these services. If properly validated tests are not available, the professional judgment of the



122 qualified school personnel shall determine eligibility of the student based upon evidence of cognitive  
 123 and/or academic achievement.

124

125 The school will:

- 126 1. Notify parents of the students selected. Parents will receive a full explanation of the procedures  
 127 for identification, an explanation of the process to exit a student from the program, the  
 128 information on the school's program, and the options that are available to identified students.
- 129 2. Obtain parental permission to place identified students in the program before any special  
 130 services and programs are provided to the student.

131

### 132 **Process for Appeal**

133 Parents/legal guardians have the right to appeal the multi-disciplinary selection committee's decision.  
 134 Individuals appealing the selection committee's decision must submit a completed appeals form or  
 135 letter requesting review of selection/placement decision. The written request must include reasons for  
 136 the appeal and, to support reconsideration, provide additional evidence of significantly advanced  
 137 cognitive or academic levels and/or outstanding intellectual, academic, or creative abilities.

138

139 Parents/legal guardians must submit the appeal request and supporting evidence to the Head of School  
 140 or Designee electronically or in hard copy form. [lsullivan@myPCM.org](mailto:lsullivan@myPCM.org) or Pullman Community  
 141 Montessori, 115 NW State Street STE 212, Pullman WA 99163. Submittals must be shared within ten  
 142 (10) school days of the multi-disciplinary selection committee's decision notification.

143

144 The school's multi-disciplinary selection committee will review the student's file, assessment profile  
 145 data, and additional evidence provided in the request for appeal.

146

147 The decision of the multi-disciplinary selection committee may include:

- 148 • Upholding the original decision of the Selection Committee;
- 149 • Reversing the original decision of the Selection Committee;

150

151 The multi-disciplinary selection committee will make a decision within ten (10) school days after receipt  
 152 of written request for reconsideration and will notify the parent/legal guardian of the decision in  
 153 writing. The appeals decision of the multi-disciplinary selection committee is the final decision.

154

### 155 **Exit Process**

156 Upon the request of a teacher or a highly capable program administrator, PCM may initiate the exit  
 157 process for students who no longer demonstrate a need for HiCap program services. The multi-  
 158 disciplinary selection committee will convene a meeting and invite parent/guardian to review the  
 159 student's profile to determine if the student qualifies for program services based on assessment data  
 160 and selection criteria. The multi-disciplinary selection committee may request additional evidence of  
 161 student capabilities. If the committee determines that the student no longer qualifies for highly capable  
 162 program services, it may recommend that the student be exited from the program. PCM will notify the  
 163 parent in writing of the committee's decision and of the appeal's process.





164

165 A parent/legal guardian may request to withdraw the student from the program. A meeting will be  
 166 convened by the HiCap Program Coordinator to discuss the request. If the parent/legal guardian desires  
 167 to withdraw the student from the program, PCM will exit the student from the program. The Selection  
 168 Committee will determine if identification procedures are necessary for students wishing to reenter the  
 169 program in the future.

170

### 171 **Program Design**

172 PCM will make a variety of appropriate program services available to students who participate in the  
 173 program. Once services are started, PCM will provide a continuum of services to identified students in  
 174 grades K-9. PCM will keep on file a description of the educational programs provided for identified  
 175 students. PCM reviews services semi-weekly for each student to ensure that the services are  
 176 appropriate.

177

178 PCM will offer highly capable students the following programs may include one or more of the  
 179 following:

- 180 • Weekly Targeted Planning and Learning Time in which enhanced lessons and learning  
 181 experiences are implemented to meet student's needs, including incorporating the NAGC Gifted  
 182 Program Standards
- 183 • Accelerated learning opportunities in higher grade bands when available
- 184 • Academic grouping arrangements that provide intellectual peer and interest group interaction

185

### 186 **Reporting**

187 Identified students will be assigned the appropriate CEDARS Gifted value(s) in the school's student  
 188 information system for the end-of-year reporting activities.

189

190 The Head of School or designee will provide an end-of-the-year report to the Office of Superintendent  
 191 of Public Instruction (OSPI) that includes

- 192 • Number of students served by grade level K-12
- 193 • Student demographic information
- 194 • Data to determine if students who are highly capable met the goals set and if the programs  
 195 provided met the academic needs of these students;
- 196 • Number and content of professional development activities provided for special teachers and  
 197 general education staff; and
- 198 • Program evaluation data and, if needed, program changes that will be made based upon this  
 199 information.

200

201 **Legal References:** NA

202

203 **Cross References:** NA

# Coversheet

## Policy & Procedure Updates: Student Records (3231)

**Section:** V. Other Business  
**Item:** E. Policy & Procedure Updates: Student Records (3231)  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 3231-Student Records.docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Student Records (3231) (Policy only).

**Description of Changes:** This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 3231.



**POLICY #3231**

**Student Records**

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**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 5/2021, WSSDA: 7/2023

**Prior Revised Dates** – WSSDA: 2/2000, 12/2003, 12/2006, 02/2010, 12/2011, 02/2013, 12/2013, 12/2014, 12/2018, 7/2019

Pullman Community Montessori (PCM) school will maintain those student records necessary for the educational guidance and/or welfare of students, for orderly and efficient operation of schools, and as required by law. All information related to individual students will be treated in a confidential and professional manner. The school will use reasonable methods to ensure that teachers and other school officials obtain access to only those education records for which they have legitimate educational interests. When information is released in compliance with state and federal law, the school and school employees are immune from civil liability unless they acted with gross negligence or in bad faith.

The school will retain records in compliance with the current, approved versions of the Local Government General Records Retention Schedule (CORE) and the School Districts and Educational Service Districts Records Retention Schedule, both of which are published on the Secretary of State's website at: [www.sos.wa.gov/archives/recordsretentionschedules.aspx](http://www.sos.wa.gov/archives/recordsretentionschedules.aspx).

Student records are the property of the school but will be available in an orderly and timely manner to students and parents. "Parent" includes the state Department of Social and Health Services when a minor student has been found dependent and placed in state custody. A parent or adult student may challenge any information in a student record believed inaccurate, misleading, or in violation of the privacy or other rights of the student.

Student records will be forwarded to other school agencies upon request. A high school student may grant authority to the school, permitting prospective employers to review the student's transcript. Parental or adult student consent will be required before the school may release student records other than to a school agency or organization, except as otherwise provided by law.

The Head of School or designee will establish procedures governing the content, management, and control of student records.

Legal References:

[42 U.S.C. 11431 et seq. McKinney-Vento Homeless Assistance Act](#)

[20 U.S.C. § 1232g Family Education Rights and Privacy Act](#)

[CFR 34 , Part 99 Family Education Rights and Privacy Act Regulations](#)



- 40 [RCW 28A.150.510 Transmittal of education records to DSHS—Disclosure of educational records—Data](#)  
 41 [sharing agreements—Comprehensive needs requirement document—Report.](#)  
 42 [RCW 28A.195.070 Official transcript withholding – Transmittal of information](#)  
 43 [RCW 28A.225.151 Reports.](#)  
 44 [RCW 28A.225.330 Enrolling students from other districts — Requests for information and permanent](#)  
 45 [records — Withheld transcripts — Immunity from liability — Notification to teachers and security](#)  
 46 [personnel — Rules](#)  
 47 [RCW 28A.230.120 High school diplomas — Issuance — Option to receive final transcripts —Notice](#)  
 48 [RCW 28A.230.180 Educational and career opportunities in the military, student access to information](#)  
 49 [on, when](#)  
 50 [RCW 28A.600.475 Exchange of information with law enforcement and juvenile court officials –](#)  
 51 [Notification of parents and students.](#)  
 52 [RCW 28A.605.030 Student education records – Parental review—release of records—Procedure.](#)  
 53 [RCW 28A.635.060 Defacing or injuring school property — Liability of pupil, parent or guardian —](#)  
 54 [Withholding grades, diploma, or transcripts — Suspension and restitution — Voluntary work program](#)  
 55 [as alternative — Rights protected](#)  
 56 [RCW 40.24.030 Address Confidentiality Program — Application — Certification](#)  
 57 [Chapter 246-105 WAC Immunization of child care and school children against certain vaccine-](#)  
 58 [preventable diseases](#)  
 59 [Chapter 392-172A WAC Rules for the provision of special education](#)  
 60 [Chapter 392-182 WAC Student Health Records](#)  
 61 [Chapter 392-415-WAC Secondary Education- standardized high school transcript](#)  
 62 [WAC 181-87-093 Failure to assure the transfer of student record information or student records](#)  
 63 [WAC 392-121-182 Alternative learning experience requirements](#)  
 64 [WAC 392-122-228 Alternative learning experiences for juvenile students incarcerated in adult jail](#)  
 65 [facilities](#)  
 66 [WAC 392-500-025 Pupil tests and records — Tests— School district policy in writing](#)  
 67  
 68 Cross References:  
 69 [2100 - Educational Opportunities for Students with a Parent in the Military](#)  
 70 [3211 - Gender-Inclusive Schools](#)  
 71 [3520 - Student Fees, Fines, or Charges](#)  
 72 [4020 - Confidential Communications](#)  
 73 [4040 - Public Access to District Records](#)  
 74 [3115 - Students Experiencing Homelessness - Enrollment Rights and Services](#)

# Coversheet

## Policy & Procedure Updates: Excused and Unexcused Absences (3122/3122P)

<b>Section:</b>	V. Other Business
<b>Item:</b> (3122/3122P)	F. Policy & Procedure Updates: Excused and Unexcused Absences
<b>Purpose:</b>	Vote
<b>Submitted by:</b>	Laylah Sullivan
<b>Related Material:</b>	3122 Excused and Unexcused Absences .docx 3122P Excused and Unexcused Absences Procedures.docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

#### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Excused and Unexcused Absences (3122/3122P).

**Description of Changes:** This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 3122 and 3122P as presented.



**POLICY #3122**

**Excused and Unexcused Absences**

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**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 06/2021, WSSDA: 7/2023

**Prior Revised Dates** – WSSDA: 12/2006, 06/2011, 12/2012, 06/2015, 07/2016, 07/2017, 08/2018, 09/2020, 06/2021, 06/2022

**Definition of Absence**

**Absence from in-person learning**

[WAC 392-401-015](#) states the definition of an absence:

1. A student is absent from in-person instruction when they are:
  - a. Not physically present on school grounds; and
  - b. Not participating in the following activities at an approved location:
    - i. Instruction; or
    - ii. Any instruction-related activity; or
    - iii. Any other School or school approved activity that is regulated by an instructional/academic accountability system, such as participation in School-sponsored sports.

**Definition of absence from synchronous and asynchronous instruction**

A student is absent from synchronous online instruction when the student does not log in to the synchronous meeting/class. (2) A student is absent from asynchronous instruction when there is no evidence that the student accessed the planned asynchronous activity. (3) Evidence of student participation in asynchronous activities must occur daily, within a twenty-four-hour time frame of when the participation is planned or expected.

**Minimum Time for Being Considered Present**

The School has authority to establish minimum thresholds similar to in-person attendance for the time in which a student must be logged in to be considered present. The Superintendent will develop a consistent and equitable approach that is documented in the student handbook and communicated clearly to all students and families. Determining a threshold for when a student is present or absent should not be left to individual teachers.

**Presence vs. Participation**

Participation, such as turning video on and participating in discussion or chat, are not to be considered when determining if a student is present or not. These are examples of participation and should be considered distinct from attendance.

**Absence from Asynchronous Instruction**

Similar to local determinations on what constitutes presence for synchronous online instruction, the Superintendent will develop a consistent and equitable approach that establishes what constitutes





43 "evidence of participation." This approach will be documented in the student handbook and  
 44 communicated clearly to all students and families. Determining what constitutes "evidence of  
 45 participation" should not be left to individual teachers.

46

#### 47 **Tardies**

48 The School has the flexibility to determine what constitutes a tardy in synchronous online settings. The  
 49 School differentiates a tardy from an absence (where the student does not attend at all) and will  
 50 exclude tardies from any reports that tally absences for the purposes of filing a truancy petition.

51

#### 52 **Daily attendance taking**

53 The School will take daily attendance for all enrolled students whether the instructional modality is in-  
 54 person, synchronous, or asynchronous. When instruction is synchronous online or asynchronous,  
 55 secondary schools will take attendance daily in each course with planned instruction and elementary  
 56 schools will take attendance at least twice a day.

57

#### 58 **Excused and Unexcused Absences**

59 Educators and administrators have a responsibility to monitor absences to determine if students and  
 60 families need support. Students are expected to attend all assigned in-person classes each day or  
 61 participate in all assigned remote instructional activities; except when there are necessary reasons for  
 62 students to be absent. Upon enrollment and at the beginning of each school year, the Pullman  
 63 Community Montessori School shall inform students and their parents/guardians of this expectation,  
 64 the benefits of regular school attendance, the consequences of truancy, the role and responsibility of  
 65 the School in regard to truancy, and resources available to assist the student and their parents and  
 66 guardians in correcting truancy. The School will also make this information available online and will take  
 67 reasonable steps to ensure parents can request and receive such information in languages in which they  
 68 are fluent. Parents will be required to date and acknowledge review of this information online or in  
 69 writing.

70

#### 71 **Excused Absences**

72 Regular school attendance is necessary for mastery of the educational program provided to students of  
 73 the School. At times, students may be absent from class or not able to participate remotely. School staff  
 74 will keep a record of absence and tardiness, including a record of excuse statements submitted by a  
 75 parent/guardian, or in certain cases, students, to document a student's excused absences. The following  
 76 principles will govern the development and administration of attendance procedures within the School:

77

78 A. Absences due to the following reasons are excused:

- 79 1. Physical health or mental health symptoms, illness, health condition or medical appointment for  
 80 the student or person for whom the student is legally responsible. Examples of symptoms,  
 81 illness, health conditions, or medical appointments include, but are not limited to, medical,  
 82 counseling, mental health wellness, dental, optometry, pregnancy, and behavioral health  
 83 treatment (which can include in-patient or out-patient treatment for chemical dependency or  
 84 mental health);



- 85 2. Family emergency including, but not limited to, a death or illness in the family;  
 86 3. Religious or cultural purpose including observance of a religious or cultural holiday or  
 87 participation in religious or cultural instruction;  
 88 4. Court, judicial proceeding, court-ordered activity, or jury service;  
 89 5. Post-secondary, technical school or apprenticeship program visitation, or scholarship interview;  
 90 6. State-recognized search and rescue activities consistent with RCW [28A.225.055](#);  
 91 7. Absence directly related to the student's homeless or foster care/dependency status;  
 92 8. Absences related to deployment activities of a parent or legal guardian who is an active duty  
 93 member consistent with RCW [28A.705.010](#);  
 94 9. Absences due to suspensions, expulsions or emergency expulsions imposed pursuant to chapter  
 95 [392-400](#) WAC if the student is not receiving educational services and is not enrolled in  
 96 qualifying "course of study" activities as defined in WAC [392-121-107](#);  
 97 10. Absences due to student safety concerns, including absences related to threats, assaults, or  
 98 bullying;  
 99 11. Absences due to a student's migrant status;  
 100 12. An approved activity that is consistent with School policy and is mutually agreed upon by the  
 101 principal or designee and a parent, guardian, or emancipated youth; and  
 102 13. Absences due to the student's lack of necessary instructional tools, including internet access or  
 103 connectivity.
- 104
- 105 B. In the event of emergency school facility closure due to COVID-19, other communicable disease  
 106 outbreak, natural disaster, or other event when Schools are required to provide synchronous  
 107 and asynchronous instruction, absences due to the following reasons are excused:
- 108 1. Absences related to the student's illness, health condition, or medical appointments due to  
 109 COVID-19 or other communicable disease;  
 110 2. Absences related to caring for a family member who has an illness, health condition, or medical  
 111 appointment due to COVID-19, other communicable disease, or other emergency health  
 112 condition related to school facility closures;  
 113 3. Absences related to the student's family obligations during regularly scheduled school hours  
 114 that are temporarily necessary because of school facility closures, until other arrangements can  
 115 be made; and  
 116 4. Absences due to the student's parent's work schedule or other obligations during regularly  
 117 scheduled school hours, until other arrangements can be made.
- 118
- 119 The School may define additional categories or criteria for excused absences. A school principal or  
 120 designee has the authority to determine if an absence meets this policy according to the above criteria  
 121 for an excused absence.
- 122
- 123 1. If an absence is excused, the student will be permitted to make up all missed assignments  
 124 outside of class under reasonable conditions and time limits established by the appropriate  
 125 teacher; where reasonable, if a student misses a participation-type class, they can request an  
 126 alternative assignment that aligns with the learning goals of the activity missed.



- 127 2. An excused absence will be verified by a parent/guardian or an adult, emancipated or  
 128 appropriately aged student, or school authority responsible for the absence. If attendance is  
 129 taken electronically, either for a course conducted online or for students physically within the  
 130 School, an absence will default to unexcused until such time as an excused absence may be  
 131 verified by a parent or other responsible adult. If a student is to be released for health care  
 132 related to family planning or abortion, the student may require that the School keep the  
 133 information confidential. Students thirteen and older have the right to keep information about  
 134 drug, alcohol or mental health treatment confidential. Students fourteen and older have the  
 135 same confidentiality rights regarding HIV and sexually transmitted diseases.
- 136 3. Except as provided in subsection (2) of this section, in the event that a child in elementary school  
 137 is required to attend school under RCW 28A.225.010 or 28A.225.015(1) and has five or more  
 138 excused absences in a single month during the current school year, or ten or more excused  
 139 absences in the current school year, the school shall schedule a conference or  
 140 conferences with the parent and child at a time reasonably convenient for all persons included  
 141 for the purpose of identifying the barriers to the child's regular attendance, and the supports  
 142 and resources that may be made available to the family so that the child is able to regularly  
 143 attend school. To satisfy the requirements of this section, the conference must include at least  
 144 one school employee such as a nurse, counselor, social worker, teacher, or community  
 145 human services provider, except in those instances regarding the attendance of a child who has  
 146 an individualized education program or a plan developed under section 504 of the rehabilitation  
 147 act of 1973, in which case the reconvening of the team that created the program or plan is  
 148 required.

149  
 150 This conference is not required if the school has received prior notice or a doctor's note has been  
 151 provided and an academic plan put in place so that the child does not fall behind.

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### **Unexcused Absences**

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1. Any absence from school for the majority of hours or periods in an average school day is unexcused unless it meets one of the criteria above or in administrative procedure for an excused absence.
2. A student's grade may be affected if a graded activity or assignment occurs during the period of time when the student is absent and that absence is not excused.
3. The school will notify a student's parent or guardian in writing or by telephone whenever the student has failed to attend school after one unexcused absence within any month during the current school year. The notification will include the potential consequences of additional unexcused absences. The school will make reasonable efforts to provide this information in a language the parent understands.
4. The school will hold a conference with the parent or guardian after three unexcused absences within any month during the current school year. The conference will analyze the causes of the student's absences and develop a plan that identifies student, school, and family commitments to reduce the student's absences from school. If the parent does not attend the conference, the school official may still hold the conference with the student. However, the school will notify the



- 169 parent of the steps the School has decided to take to eliminate or reduce the student's  
 170 absences.
- 171 5. Between the student's second and seventh unexcused absence, the school must take the  
 172 following data-informed steps:
- 173
- 174 I. Middle and high school students will be administered the Washington Assessment of the Risks  
 175 and Needs of Students (WARNS) or other assessment.
- 176 II. These steps must include, where appropriate, providing an available approved best practice or  
 177 research-based intervention, or both, consistent with the WARNS profile or other assessment, if  
 178 an assessment was applied, adjusting the child's school program or school or course  
 179 assignment, providing more individualized or remedial instruction, providing appropriate  
 180 vocational courses or work experience, referring the child to a community engagement board,  
 181 requiring the child to attend an alternative school or program, or assisting the parent or child to  
 182 obtain supplementary services that might eliminate or ameliorate the cause or causes for the  
 183 absence from school.
- 184 III. For any child with an existing individualized education plan or 504 plan, these steps must  
 185 include the convening of the child's individualized education plan or 504 plan team, including a  
 186 behavior specialist or mental health specialist where appropriate, to consider the reasons for the  
 187 absences. If necessary, and if consent from the parent is given, a functional behavior assessment  
 188 to explore the function of the absence behavior shall be conducted and a detailed behavior plan  
 189 completed. Time should be allowed for the behavior plan to be initiated and data tracked to  
 190 determine progress.
- 191
- 192 Not later than the student's seventh unexcused absence in a month the School will enter into an  
 193 agreement with the student and parents that establishes school attendance requirements, refer the  
 194 student to a community engagement board or file a petition and affidavit with the juvenile court  
 195 alleging a violation of RCW 28A.225.010.
- 196
- 197 6. If such action is not successful, the School will file a petition and affidavit with the juvenile court  
 198 alleging a violation of RCW 28A.225.010 by the parent, student or parent and student no earlier  
 199 than the seventh unexcused absence within any month during the current school year and not  
 200 later than the fifteenth unexcused absence during the current school year.

202 The Head of School will enforce the School's attendance policies and procedures. Because the full  
 203 knowledge and cooperation of students and parents are necessary for the success of the policies and  
 204 procedures, procedures will be disseminated broadly and made available to parents and students  
 205 annually.

206  
 207

### 208 **Tardies and Disciplinary Actions**

209  
 210

1. Students shall not be absent if:



- 211 a. They have been suspended, expelled, or emergency removed pursuant to chapter [392-](#)  
 212 [400](#) WAC;  
 213 b. Are receiving educational services as required by RCW [28A.600.015](#) and chapter [392-400](#)  
 214 WAC; and  
 215 c. The student is enrolled in qualifying "course of study" activities as defined in WAC [392-](#)  
 216 [121-107](#). Course of study activities do not include sending homework packets home.  
 217 2. A full day absence is when a student is absent for fifty percent or more of their scheduled day.  
 218 3. A school or School shall not convert or combine tardies into absences that contribute to a  
 219 truancy petition.  
 220

221 A student shall be considered absent if they are on school grounds but not in their assigned setting.  
 222

### 223 **Tiered response system for student absences**

224 WAC 392-401A-045 requires:

225 Schools to implement minimum requirements of a multitiered system of support for attendance to  
 226 address barriers to student attendance, provide timely interventions and best practices to reduce  
 227 chronic absenteeism and truancy. Multitiered systems of support include:  
 228

- 229 (a) Monitoring daily attendance data for all students who are absent, whether the absence is excused or  
 230 unexcused;  
 231 (b) A process to contact families and verify current contact information for each enrolled student that  
 232 includes multiple attempts and modalities in the parent's home language;  
 233 (c) Differentiated supports that address the barriers to attendance and participation that includes  
 234 universal supports for all students and tiered interventions for students at-risk of and experiencing  
 235 chronic absence, including school and School attendance or engagement teams, connecting to  
 236 community resources, and community engagement boards; and  
 237 (d) A process for outreach and reengagement for students who have been withdrawn due to  
 238 nonattendance and there is no evidence that the student is enrolled elsewhere. This outreach and  
 239 reengagement process must include:  
 240  
 241 (i) A school and/or School point person/people to maintain the list, keep it updated, and coordinate the  
 242 outreach;  
 243 (ii) School or School staff assigned to conduct the outreach and attempts at reengagement in  
 244 coordination with community partners or other programs;  
 245 (iii) Multiple methods of communication and outreach in a language or mode of communication that  
 246 the parent understands including phone calls, texts, letters, and home visits;  
 247 (iv) Referral to community-based organizations;  
 248 (v) Documentation of the attempts to reach student and family; and  
 249 (vi) Follow the required steps to address unexcused absences in chapter 28A.225 RCW, including early  
 250 communication to parents, holding parent conferences and administering a truancy screener to  
 251 understand the underlying reasons for the absences, and providing evidence-based or best practice  
 252 interventions, even if the student has been withdrawn due to nonattendance.



253

254 **Students dependent pursuant to Chapter 13.34, RCW**

255 A school representative or certificated staff member will review unexpected or excessive absences of a  
 256 student who has been found dependent under the Juvenile Court Act with that student and adults  
 257 involved with that student. Adults includes the student's caseworker, educational liaison, attorney if one  
 258 is appointed, parent or guardians, foster parents and/or the person providing placement for the  
 259 student. The review will take into consideration the cause of the absences, unplanned school transitions,  
 260 periods of running from care, in-patient treatment, incarceration, school adjustment, educational gaps,  
 261 psychosocial issues, and the student's unavoidable appointments that occur during the school day. The  
 262 representative or staff member must proactively support the student's management of their school  
 263 work.

264

265 **Migrant Students**

266 The School, parent/guardian and student are encouraged to work to create an Extended Absence  
 267 Agreement with the school to decrease the risk of an adverse effect on the student's educational  
 268 progress.

269

270 **Legal References:**

271 [Chapter 28A.225 Compulsory school attendance and admission](#)

272 [RCW 13.34.300 Relevance of failure to cause juvenile to attend school to neglect petition](#)

273 [Chapter 392-401A WAC Statewide definition of absence for the 2020-21 school year](#)

274

275 **Cross References:**

276 [3241 - Student Discipline](#)

277 [4218 - Language Access](#)



**Procedure for POLICY #3122P**  
**Excused and Unexcused Absences**

**Adopted** – 11/2023

**Last Revised** – PCM: 011/2023, 6/2021, WSSDA: 06/2022

**Prior Revised Dates** – WSSDA: 06/1999, 06/2001, 06/2011, 12/2011, 10/2012, 12/2012, 06/2015, 07/2016, 07/2017, 08/2018, 09/2020, 06/2021,

Students are expected to attend all assigned classes each day. Pullman Community Montessori (PCM) school staff will keep a record of absence and tardiness, including a call log and/or a record of excuse statements submitted by a parent/guardian or, in certain cases, students, to document a student's excused absences.

**Excused Absences**

The following are valid excuses for absences and tardiness. Assignments and/or activities not completed because of an excused absence or tardiness may be made up in the manner provided by the teacher.

**Absence due to:**

1. Physical health or mental health symptoms, illness, health condition or medical appointment for the student or person for whom the student is legally responsible. Examples of symptoms, illness, health conditions, or medical appointments include, but are not limited to, medical, counseling, mental health wellness, dental, optometry, pregnancy, and behavioral health treatment (which can include in-patient or out-patient treatment for chemical dependency or mental health);
2. Family emergency including, but not limited to, a death or illness in the family;
3. Religious or cultural purpose including observance of a religious or cultural holiday or participation in religious or cultural instruction;
4. Court, judicial proceeding, court-ordered activity, or jury service;
5. Post-secondary, technical school or apprenticeship program visitation, or scholarship interview;
6. State-recognized search and rescue activities consistent with RCW [28A.225.055](#);
7. Absence directly related to the student's homeless or foster care/dependency status;
8. Absences related to deployment activities of a parent or legal guardian who is an active duty member consistent with RCW [28A.705.010](#);
9. Absences due to suspensions, expulsions or emergency expulsions imposed pursuant to chapter [392-400](#) WAC if the student is not receiving educational services and is not enrolled in qualifying "course of study" activities as defined in WAC [392-121-107](#);
10. Absences due to student safety concerns, including absences related to threats, assaults, or bullying;
11. Absences due to a student's migrant status; and
12. An approved activity that is consistent with School policy and is mutually agreed upon by the principal or designee and a parent, guardian, or emancipated youth;



42 13. Absences due to the student's lack of necessary instructional tools, including internet access or  
 43 connectivity.  
 44

45 In the event of emergency school facility closure due to COVID-19, other communicable  
 46 disease outbreak, natural disaster, or other event when Schools are required to provide synchronous  
 47 and asynchronous instruction, absences due to the following reasons are excused:

- 48 1. Absences related to the student's illness, health condition, or medical appointments due to  
 49 COVID-19 or other communicable disease;
- 50 2. Absences related to caring for a family member who has an illness, health condition, or medical  
 51 appointment due to COVID-19, other communicable disease, or other emergency health  
 52 condition related to school facility closures;
- 53 3. Absences related to the student's family obligations during regularly scheduled school hours  
 54 that are temporarily necessary because of school facility closures, until other arrangements can  
 55 be made; and
- 56 4. Absences due to the student's parent's work schedule or other obligations during regularly  
 57 scheduled school hours, until other arrangements can be made.  
 58

59 The Head of School or designee has the authority to determine if an absence meets the above criteria  
 60 for an excused absence.  
 61

- 62 1. **Parental notification.** When possible, the parent/guardian is expected to notify the school  
 63 office on the morning of the absence by phone, e-mail, or written note, and to provide the  
 64 excuse for the absence. If no excuse is provided with the notification, or no notification is  
 65 provided, the parent/guardian will submit an excuse via phone, e-mail or written note upon the  
 66 student's return to school. Adult students (those over eighteen) and emancipated students  
 67 (those over sixteen who have been emancipated by court action) will notify the school office of  
 68 their absences with a note of explanation. Students fourteen years old or older who are absent  
 69 from school due to testing or treatment for a sexually transmitted disease will notify the school  
 70 of their absence with a note of explanation, which will be kept confidential. Students thirteen  
 71 years and older may do the same for mental health, drug or alcohol treatment; and all students  
 72 have that right for family planning and abortion.  
 73

74 A parent/guardian may request that a student be excused from attending school in observance  
 75 of a religious holiday. In addition, a student, upon the request of his/her parent, may be excused  
 76 for a portion of a school day to participate in religious instruction provided such is not  
 77 conducted on school property. A student will be allowed one makeup day for each day of  
 78 absence.

- 79 2. **Absence for parental-approved activities.** This category of absence will be counted as  
 80 excused for purposes agreed to by the principal and the parent/guardian. An absence may not  
 81 be approved if it causes a serious adverse effect on the student's educational progress. The  
 82 student may not be able to achieve the objectives of the unit of instruction as a result of  
 83 absence from class. In such a case, a parent or guardian-approved absence would have an





- 84 adverse effect on the student's educational progress, including the grade for the course. A  
 85 student, upon the request of his/her parent/guardian, may be excused for a portion of a school  
 86 day to participate in religious instruction provided such is not conducted on school property or  
 87 otherwise involves the school to any degree.
- 88 3. **Absence resulting from disciplinary actions — or short-term suspension.** As required by law,  
 89 students who are removed from a class or classes as a disciplinary measure or students who  
 90 have been placed on short-term or long-term suspension will have the right to make up  
 91 assignments or exams missed during the time they were denied entry to the classroom if the  
 92 effect of the missed assignments will be a substantial lowering of the course grade.
- 93 4. **Extended illness or health condition.** If a student is confined to home or hospital for an  
 94 extended period, the school will arrange for the accomplishment of assignments at the place of  
 95 confinement whenever practical. If the student is unable to do his/her schoolwork, or if there are  
 96 major requirements of a particular course which cannot be accomplished outside of class the  
 97 student may be required to take an incomplete or withdraw from the class without penalty.
- 98 5. **Excused absence for chronic health condition.** Students with a chronic health condition that  
 99 interrupts regular attendance may qualify for placement in a limited attendance and  
 100 participation program. The student and his/her parent will apply to the Head of School or  
 101 counselor, and a limited program will be written following the advice and recommendations of  
 102 the student's medical advisor. The recommended limited program will be approved by the  
 103 principal. Staff will be informed of the student's needs, though the confidentiality of medical  
 104 information will be respected at the parent's request.

#### 106 **Required conference for elementary school students**

107 If an elementary school student has **five or more excused absences in a single month** during the  
 108 current school year or ten or more excused absences in the current school year, the School will schedule  
 109 a conference with the student and their parent(s) at a reasonably convenient time. The conference is  
 110 intended to identify barriers to the student's regular attendance and to identify supports and resources  
 111 so the student may regularly attend school.

112  
 113 The conference must include at least one school employee, preferably a nurse, counselor, social  
 114 worker, teacher or community human service provider, and may occur on the same day as the  
 115 scheduled parent-teacher conference, provided it takes place within thirty days of the absences. If the  
 116 student has an Individualized Education Program or a Section 504 Plan, the team that created that  
 117 program must reconvene. A conference is not required if prior notice of the excused absences was  
 118 provided to the School or if a doctor's note has been provided and a plan is in place to ensure the  
 119 student will not fall behind in their coursework.

#### 121 **Tiered response system for student who are absent from remote learning**

122 Students who are marked absent from remote learning will receive interventions and services consistent  
 123 with the tiered response system for student absences implemented by the School pursuant to WAC  
 124 392-401A-045. Under the tiered response system, the School will:



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- Monitor daily attendance data for all students who are absent from remote learning, whether excused or unexcused;
  - Make multiple attempts to contact the families regarding student absences using multiple modalities and in the parent's home language;
  - Provide daily notification of absences to parents;
  - Provide outreach from the student's school to determine student needs, such as basic needs, connectivity and hardware, connection with health and social services as necessary;
  - Provide differentiated supports to students that address the barriers to attendance and participation, including universal supports for all students and tiered interventions for students at-risk of and experiencing chronic absence; and
  - When feasible and appropriate, transition students to full-time in-person learning or other program to accommodate the student's needs.

### 138 **Unexcused Absences**

139 An "unexcused absence" means that a student has failed to attend the majority of hours or periods in  
 140 an average school day, has failed to comply with a more restrictive school policy on absences, or  
 141 has failed to comply with alternative learning experience program attendance requirements.

142

143 Unexcused absences occur when:

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1. The parent, guardian, or adult student submits an excuse that does not meet the definition of an excused absence as defined above; or
  2. The parent, guardian, or adult student fails to submit any type of excuse statement, whether by phone, e-mail or in writing, for an absence.

149 **Each unexcused absence within any month of the current school year** will be followed by a letter or  
 150 phone call to the parent informing them of the consequences of additional unexcused absences. The  
 151 school will make reasonable efforts to provide this information in a language in which that parent is  
 152 fluent. A student's grade will not be affected if no graded activity is missed during such an absence.

153

154 **After three unexcused absences within any month of the current school year**, the school will hold a  
 155 conference with the principal, student, and parent to analyze the causes of the student's absenteeism. If  
 156 a regularly scheduled parent-teacher conference is scheduled to take place within thirty days of the  
 157 third unexcused absence, the School may schedule the attendance conference on the same day. If the  
 158 parent/guardian does not attend the scheduled conference, the school may hold the conference with  
 159 the student and principal. However, the school will notify the parent of the steps to eliminate or reduce  
 160 the student's absences.

161

162 **At some point after the second and before the seventh unexcused absence**, the School will take  
 163 data-informed steps to eliminate or reduce the student's absences. In middle school and high school,  
 164 these steps will include application of the Washington Assessment of the Risks and Needs of Students  
 165 (WARNS) or other assessment by the School's designated employee.

166



167 For any student with an existing Individualized Education Program (IEP) or Section 504 Plan, these steps  
 168 will include convening the student's IEP team or Section 504 team, including a behavior specialist or  
 169 mental health specialist where appropriate, to consider the reasons for the student's absences. If  
 170 necessary, and if the student's parent gives consent, the School will conduct a functional behavior  
 171 assessment and will complete a detailed behavior plan to explore the function of the absence behavior.

172  
 173 For any student who does not have an IEP or Section 504 Plan, but who is reasonably believed to have a  
 174 mental or physical disability or impairment, these steps will include informing the student's  
 175 parent/guardian of the right to obtain an appropriate evaluation at no cost to the parent to determine  
 176 whether the student has a disability or impairment and needs accommodations, special education  
 177 services, or related services. This includes students with suspected emotional or behavioral disabilities. If  
 178 the school obtains consent to conduct an evaluation, time should be allowed for the evaluation to be  
 179 completed, and if the student is found to be eligible for accommodations, special education services, or  
 180 related services, a plan will be developed to address the student's needs.

181  
 182 The School will designate a staff member to apply the Washington Assessment of the Risks and Needs  
 183 of Students (WARNS) and, where appropriate, provide the student with best practice or research-based  
 184 interventions consistent with WARNS. As appropriate, the School will also consider:

- 185 • adjusting the student's course assignments;
- 186 • providing the student more individualized instruction;
- 187 • providing appropriate vocational courses or work experience;
- 188 • requiring the student to attend an alternative school or program;
- 189 • assisting the parent or student to obtain supplementary services; or
- 190 • referring the student to a community engagement board.

191  
 192 **Transfers**

193 In the case of a student who transfers from one School to another during the school year, the sending  
 194 School will provide to the receiving School, together with a copy of the WARNS assessment and any  
 195 interventions previously provided to the student, the most recent truancy information for that student.  
 196 The information will include the online or written acknowledgment by the parent and student. The  
 197 sending School will use the standard choice transfer form for releasing a student to a nonresident  
 198 school School for the purposes of accessing an alternative learning experience program.

199  
 200 **Not later than a student's seventh unexcused absence in a month**, the School will:

- 201 a. enter into an agreement with the student and parents/guardians that establishes school
- 202 attendance requirements;
- 203 b. refer the student to a community engagement board; or
- 204 c. file a petition to juvenile court (see below).

205  
 206 **Community Engagement Board**

207 A "community engagement board" means a board established pursuant to a memorandum of  
 208 understanding (MOU) between a juvenile court and the school and composed of members of the local



209 community in which the student attends school. The school will enter into an MOU with the juvenile  
 210 court in Whitman County to establish a community engagement board prior to the 2021-222 school  
 211 year.

212  
 213 The school will designate and identify to the Whitman County Juvenile Court and to the Office of the  
 214 Superintendent of Public Instruction a staff member to coordinate School efforts to address excessive  
 215 absenteeism and truancy, including outreach and conferences, coordinating the MOU, establishing  
 216 protocols and procedures with the court, coordinating trainings, sharing evidence-based and culturally  
 217 appropriate promising practices. The School will also identify a person within each school to serve as a  
 218 contact regarding excessive absenteeism and truancy and assisting in the recruitment of community  
 219 engagement board members.

220  
 221 After the student's **seventh unexcused absence within any month during the current school year**  
 222 **and not later than the fifteenth unexcused absence during the current school year**, if the school's  
 223 attempts to substantially reduce a student's absences have not been successful and if the student is  
 224 under the age of seventeen, the School will file a petition and supporting affidavit for a civil action in  
 225 juvenile court.

226  
 227 **Petition to juvenile court**

228 The petition will contain the following:

- 229 1. A statement that the student has unexcused absences in the current school year. (*School Note:*  
 230 *While petitions must be filed if the student has seven or more unexcused absences within any*  
 231 *month, or ten or more unexcused absences in the current school year, a petition may be filed*  
 232 *earlier. Unexcused absences accumulated in another school or school will be counted when*  
 233 *preparing the petition);*
- 234 2. An attestation that actions taken by the school have not been successful in substantially  
 235 reducing the student's absences from school;
- 236 3. A statement that court intervention and supervision are necessary to assist the school to reduce  
 237 the student's absences from school;
- 238 4. A statement that RCW 28A.225.010 has been violated by the parent, student or parent and  
 239 student;
- 240 5. The student's name, date of birth, school, address, gender, race and ethnicity; and the names  
 241 and addresses of the student's parents/guardians, whether the student and parent are fluent in  
 242 English, whether there is an existing individualized education program (IEP) and the student's  
 243 current academic status in school;
- 244 6. A list of all interventions that have been attempted, a copy of any previous truancy assessment  
 245 completed by the student's current school, the history of approved best practices intervention  
 246 or research-based intervention(s) previously provided to the student by the School, and a copy  
 247 of the most recent truancy information document provided to the parent.
- 248 7. Facts that support the above allegations.
- 249



250 Petitions may be served by certified mail, return receipt requested, but if such service is unsuccessful,  
251 personal service is required. At the school's choice, it may be represented by a person who is not an  
252 attorney at hearings related to truancy petitions.

253

254 If the allegations in the petition are established by a preponderance of the evidence, the court shall  
255 grant the petition and enter an order assuming jurisdiction to intervene for a period of time determined  
256 by the court, after considering the facts alleged in the petition and the circumstances of the student, to  
257 most likely cause the student to return to and remain in school while the student is subject to the  
258 court's jurisdiction.

259

260 If the court assumes jurisdiction, the school School will periodically report to the court any additional  
261 unexcused absences by the student, actions taken by the school School, and an update on the student's  
262 academic status in school at a schedule specified by the court. The first report must be received no later  
263 than three (3) months from the date that the court assumes jurisdiction.

264

265 All sanctions imposed for failure to comply with the attendance policies and procedures will be  
266 implemented in conformance with state and School regulations regarding discipline or corrective  
267 action. (See WSSDA policy 3241, Student Discipline.)

268

269

# Coversheet

## Policy & Procedure Updates: Discipline (3241/3241P)

**Section:** V. Other Business  
**Item:** G. Policy & Procedure Updates: Discipline (3241/3241P)  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 3241 Student Discipline.docx  
3241P Student Discipline Procedure.docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Excused and Unexcused Absences (3122/3122P).

**Description of Changes:** This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 3241 and 3241P as presented.



**POLICY #3241**

**Student Discipline**

**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 6/2021, WSSDA: 02/2021

**Prior Revised Dates** – 04/2019, 02/2021, 07/2023

The Board of Trustees of the Pullman Community Montessori (PCM) school focuses on the educational achievement of each and every student. PCM holds high expectations for all students and gives all students the opportunity to achieve personal and academic success. “Discipline” means any action taken by the school in response to behavioral violations, including exclusionary as well as positive and supportive forms of discipline. The Board intends that this policy and procedure be implemented in a manner that supports positive school climate, maximizes instructional time, and increases equitable educational opportunities.

The purposes of this policy and accompanying procedure include:

- Engaging with school personnel, students, parents, families, and the community in decisions related to the development and implementation of discipline policies and procedures;
- Supporting students in meeting behavioral expectations, including providing for early involvement of parents and families;
- Administering discipline in ways that respond to the needs and strengths of students and keep students in the classroom to the maximum extent possible;
- Providing educational services that students need to complete their education without disruption;
- Facilitating collaboration between school personnel, students, parents, and families to support successful reentry into the classroom following a suspension or expulsion;
- Ensuring fairness, equity, and due process in the administration of discipline;
- Implementing culturally responsive discipline that provides every student the opportunity to achieve personal and academic success;
- Providing a safe environment for all students and for School employees;

**Rights and Responsibilities/School Commitment**

The Board recognizes the negative and disproportionate impact of exclusionary discipline practices and is committed to:

- Identifying and addressing discipline policies and practices that perpetuate educational opportunity gaps;
- Proactively implementing discipline practices that support students in meeting behavioral expectations without losing access to instruction;
- Implement the discipline policy, based on the Nautilus approach, as an integrated aspect of the school’s Multi-Tiered Systems of Support (MTSS) plan.





43

44 The School will observe students' fundamental rights and will administer discipline in a manner that  
 45 does not:

46

- 47 1. Unlawfully discriminate against a student on the basis of sex, race, creed, religion, color, national  
 48 origin, sexual orientation, gender expression, gender identity, disability, or the use of a trained  
 49 dog guide or service animal;
- 50 2. Deprive a student of the student's constitutional right to freedom of speech and press, the  
 51 constitutional right to peaceably assemble and to petition the government and its  
 52 representatives for a redress of grievances, the constitutional right to the free exercise of  
 53 religion and to have the student's school free from sectarian control or influence, subject to  
 54 reasonable limitations upon the time, place, and manner of exercising the right;
- 55 3. Deprive a student of the student's constitutional right to be secure in the student's person,  
 56 papers, and effects against unreasonable searches and seizures;
- 57 4. Unlawfully interfere in a student's pursuit of an education while in the custody of the school; or
- 58 5. Deprive a student of the student's right to an equal educational opportunity, in whole or in part,  
 59 by a school without due process of law.

60

61 This School's student discipline policy and procedure is designed to provide students with a safe,  
 62 healthy, and educationally sound environment. Students are expected to be aware of and comply with  
 63 this policy and procedure, including behavioral expectations that respect the rights, person, and  
 64 property of others. Students are also expected to pursue the required course of studies. Students and  
 65 staff are expected to work together to develop a positive climate for learning, consistent with Board  
 66 Policy 3112 – Social Emotional Climate and the Student and Family Handbook.

67

### 68 **Development and review**

69 Accurate and complete reporting of all disciplinary actions, including the associated student-level  
 70 information, behavioral violations, and other forms of discipline the School considered or attempted, is  
 71 essential for effective review of this policy; therefore, the School will ensure such reporting.

72

73 The School will collect data on disciplinary actions administered in each school, as required by RCW  
 74 [28A.300.042](#), and any additional data required under other School policies and procedures.

75

76 The School will ensure that Head of School confer with certificated building employees at least annually  
 77 to develop and/or review building discipline standards and review the fidelity of implementation of  
 78 those standards. The Head of School and certificated staff will develop written school procedures for  
 79 administering discipline at their school with the participation of other school personnel, students,  
 80 parents, families, and the community. The school will:

81

- 82 1. Establish behavioral expectations with students and proactively teach expectations across  
 83 various school settings.



- 84 2. Develop precise definitions for problem behaviors and behavioral violations to address  
 85 differences in perceptions of subjective behaviors and reduce the effect of implicit bias.  
 86 3. Define the differences between minor and major behavior incidents to clarify the types of  
 87 behaviors that may or may not result in classroom exclusion or are severe enough that an  
 88 administrator needs to be involved.  
 89 4. Identify a continuum of best practices and strategies for classroom-based responses that  
 90 building staff should administer before or instead of classroom exclusion to support students in  
 91 meeting behavioral expectations.  
 92

93 The School's handbooks, codes of conduct, and building discipline standards must not conflict with this  
 94 policy, accompanying procedures, or other Board policies. A school's building discipline standards must  
 95 be annually approved by the Head of School or their designee.  
 96

97 The Head of School will ensure teachers and other school personnel receive adequate support to  
 98 effectively implement a continuum of identified best practices and strategies that:

- 99 1. Focus on prevention to reduce the use of exclusionary discipline practices;  
 100 2. Allow the exercise of professional judgment and skill sets; and  
 101 3. May be adapted to individual student needs in a culturally responsive manner.  
 102

103 The Head of School will confer with certificated building employees at least annually to establish criteria  
 104 for when certificated employees must complete classes to improve classroom management skills.  
 105

106 The School will periodically review and further develop this policy and procedure with the participation  
 107 of school personnel, students, parents, families, and the community. As part of this development and  
 108 review process, the school will use disaggregated data collected under RCW [28A.300.042](#) to monitor the  
 109 impact of student discipline practices as well as to improve fairness and equity in the administration of  
 110 student discipline. Discipline data must be disaggregated by:

- 111 1. School.  
 112 2. Student groups, including by gender, grade level, race/ethnicity (including further  
 113 disaggregation of federal race and ethnicity categories in accordance with RCW [28A.300.042](#)(1)  
 114 and [CEDARS](#) Appendices Y and Z), low-income, English language learner, migrant, special  
 115 education, Section 504, foster care, and homeless.  
 116 3. Behavioral violation.  
 117 4. Discipline types, including classroom exclusion, in-school suspension, short-term suspension,  
 118 long-term suspension, emergency removal, and expulsion.  
 119  
 120

121 The School will follow the practices outlined in guidance from the [Race and Ethnicity Student Data Task](#)  
 122 [Force](#) when disaggregating broader racial categories into subracial and subethnic categories. The  
 123 School will consider student program status and demographic information (i.e. gender, grade-level,  
 124 low-income, English language learner, migrant, special education, Section 504, foster care, and  
 125 homeless) when disaggregating student race and ethnicity data to identify any within-group variation in



126 school discipline experiences and outcomes of diverse student groups. This process may include  
 127 reviewing data to prevent and address discrimination against students in protected classes identified in  
 128 chapters [28A.640](#) and [28A.642](#) RCW, however, the School will ensure it reviews disaggregated discipline  
 129 data in accordance with WAC 392-190-048 at least annually.

130

131 PCM will implement: **insert reference to specific school-based teams e.g. PBIS, Equity, MTSS, or building**  
 132 **leadership teams or committees**

133

134 The School will:

- 135 • set at least one goal annually for improving equitable student outcomes;
- 136 • create an actions plan or plans;
- 137 • evaluate previous goals and action plans; and
- 138 • revise goals and action plans, based on evaluations.

139

140 PCM will share identified goals and action plans with all staff, students, parents, families, and the  
 141 community.

142

### 143 **Distribution of policies and procedures**

144 The School will make the current version of this policy and procedure available to families and the  
 145 community. The School will annually provide this policy and procedure to all School personnel,  
 146 students, parents, and families, which may require language assistance for students and parents with  
 147 limited-English proficiency under Title VI of the Civil Rights Act of 1964.

148

149 The School will ensure School employees and contractors are knowledgeable of this student discipline  
 150 policy and procedure. At the building level, schools will annually provide the current building discipline  
 151 standards, developed as stated above, to all school personnel, students, parents, and families, which  
 152 may require language assistance for students and parents with limited-English proficiency under Title VI  
 153 of the Civil Rights Act of 1964. will ensure all school personnel are knowledgeable of the school  
 154 building discipline standards. Schools are encouraged to provide discipline training developed under  
 155 RCW [28A.415.410](#) to support implementation of this policy and procedure to all school staff as feasible.

156

### 157 **Application**

158 This policy and accompanying procedure will be construed in a manner consistent with Washington law  
 159 as stated in WAC 392-400-020.

160

161

### 162 **Legal References:**

163 [42 U.S.C. 2000d et seq. Civil Rights Act of 1964](#)

164 [34 CFR Part 100.3 Regulations implementing Civil Rights Act of 1964](#)

165 [Chapter 392-400, WAC Pupils](#)

166 [WAC 392-190-048 Access to course offerings – Student discipline](#)

167 [Chapter 28A.320, RCW Provisions applicable to all Schools](#)



**PULLMAN PUBLIC**  
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**MONTESSORI K-9**

- 168 [Chapter 28A.600 RCW, Students](#)
- 169 [RCW 28A.400.110 Principal to assure appropriate student discipline — Building discipline standards —](#)
- 170 [Classes to improve classroom management skills](#)
- 171 [RCW 28A.400.100 Principals and vice principals — Employment of — Qualifications — Duties](#)
- 172 [Chapter 28A.225, RCW Compulsory school attendance and admission](#)
- 173 [RCW 28A.150.240 Certificated teaching and administrative staff as accountable for classroom teaching](#)
- 174 [— Scope — Responsibilities — Penalty](#)
- 175 [RCW 9.41.280 Possessing dangerous weapons on school facilities — Penalty — Exceptions](#)
- 176
- 177 **Cross References:**
- 178 [2161 - Special Education and Related Services for Eligible Students](#)
- 179 [2162 - Education of Students With Disabilities Under Section 504 of the Rehabilitation Act of 1973](#)
- 180 [3122 - Excused and Unexcused Absences](#)
- 181 [3210 - Nondiscrimination](#)
- 182 [3244 - Prohibition of Corporal Punishment](#)
- 183 [4210 - Regulation of Dangerous Weapons on School Premises](#)



**Procedure for POLICY #3241P**  
**Student Discipline**

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**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 6/2021, WSSDA: 7/2023

**Prior Revised Dates** – WSSDA: 04/2019, 08/01/2019, 2/2021

**Introduction**

The purpose of this student discipline procedure is to implement the Pullman Community Montessori (PCM) school student discipline policy as adopted by the Board. These procedures are consistent with the Board's student discipline policy, as well as all applicable federal and state laws.

**Definitions**

For purposes of the student disciplinary policy and procedures, the following definitions will apply:

- **"Behavioral violation"** means a student's behavior that violates the school's discipline policies.
- **"Best practices and strategies"** refers to other forms of discipline the school identified that school personnel should administer to support students in meeting behavioral expectations.
- **"Classroom exclusion"** means the exclusion of a student from a classroom or instructional or activity area for behavioral violations, subject to the requirements of WAC [392-400-330](#) and [392-400-335](#). Classroom exclusion does not include actions that result in missed instruction for a brief duration when:
  - (a) a teacher or other school personnel attempts other forms of discipline to support the student in meeting behavioral expectations; and
  - (b) the student remains under the supervision of the teacher or other school personnel during such brief duration.
- **"Culturally responsive"** has the same meaning as "cultural competency" in RCW [28A.410.270](#), which states "cultural competency" includes knowledge of student cultural histories and contexts, as well as family norms and values in different cultures; knowledge and skills in accessing community resources and community and parent outreach; and skills in adapting instruction to students' experiences and identifying cultural contexts for individual students.
- **"Discipline"** means any action taken by a school in response to behavioral violations.
- **"Disruption of the educational process"** means the interruption of classwork, the creation of disorder, or the invasion of the rights of a student or group of students.
- **"Emergency removal"** means the removal of a student from school because the student's presence poses an immediate and continuing danger to other students or school personnel, or an immediate and continuing threat of material and substantial disruption of the educational process, subject to the requirements in WAC [392-400-510](#) through [392-400-530](#).



- 41 • **“Expulsion”** means a denial of admission to the student’s current school placement in response  
 42 to a behavioral violation, subject to the requirements in WAC [392-400-430](#) through [392-400-](#)  
 43 [480](#).
- 44 • **“Length of an academic term”** means the total number of school days in a single trimester or  
 45 semester, as defined by the board of directors.
- 46 • **“Other forms of discipline”** means actions used in response to problem behaviors and  
 47 behavioral violations, other than classroom exclusion, suspension, expulsion, or emergency  
 48 removal, which may involve the use of best practices and strategies included in the state menu  
 49 for behavior developed under RCW [28A.165.035](#).
- 50 • **“Parent” has the same meaning as in** WAC [392-172A-01125](#), and means (a) a biological or  
 51 adoptive parent of a child; (b) a foster parent; (c) a guardian generally authorized to act as the  
 52 child’s parent, or authorized to make educational decisions for the student, but not the state, if  
 53 the student is a ward of the state; (d) an individual acting in the place of a biological or adoptive  
 54 parent, including a grandparent, stepparent, or other relative with whom the student lives, or an  
 55 individual who is legally responsible for the student’s welfare; or a surrogate parent who has  
 56 been appointed in accordance with WAC [392-172A-05130](#). If the biological or adoptive parent is  
 57 attempting to act as the parent and more than one party meets the qualifications to act as a  
 58 parent, the biological or adoptive parent must be presumed to be the parent unless he or she  
 59 does not have legal authority to make educational decisions for the student. If a judicial decree  
 60 or order identifies a specific person or persons to act as the “parent” of a child or to make  
 61 educational decision on behalf of a child, then that person or persons shall be determined to be  
 62 the parent for purposes of this policy and procedure.
- 63 • **“School board”** means the governing board of directors of the school.
- 64 • **“School business day”** means any calendar day except Saturdays, Sundays, and any federal and  
 65 school holidays upon which the office of the Head of School is open to the public for business. A  
 66 school business day concludes or terminates upon the closure of the Head of School’s office for  
 67 the calendar day.
- 68 • **“School day”** means any day or partial day that students are in attendance at school for  
 69 instructional purposes.
- 70 • **“Suspension”** means the denial of attendance in response to a behavioral violation from any  
 71 subject or class, or from any full schedule of subjects or classes, but not including classroom  
 72 exclusions, expulsions, or emergency removals. Suspension may also include denial of admission  
 73 to or entry upon, real and personal property that is owned, leased, rented, or controlled by the  
 74 school.
- 75 ○ **In-school suspension** means a suspension in which a student is excluded from the  
 76 student's regular educational setting but remains in the student's current school  
 77 placement for up to ten consecutive school days, subject to the requirements in WAC  
 78 [392-400-430](#) through [392-400-475](#).
- 79 ○ **Short-term suspension** means a suspension in which a student is excluded from school  
 80 for up to ten consecutive school days, subject to the requirements in WAC [392-400-430](#)  
 81 through [392-400-475](#).



- 82                   ○ **Long-term suspension** means a suspension in which a student is excluded from school  
 83 for more than ten consecutive school days, subject to the requirements in WAC [392-400-](#)  
 84 [430](#) through [392-400-475](#).  
 85

### 86 **Engaging with Families & Language Assistance**

87  
 88 The school will provide for early involvement of parents in efforts to support students in meeting  
 89 behavioral expectations. Additionally, school personnel will make every reasonable attempt to involve  
 90 the student and parent in the resolution of behavioral violations. This invitation will first come through  
 91 the classroom teacher. If the behavior continues the student may be moved in the Child Study process  
 92 at which time the family will be invited to engage with the Child Study team.  
 93

94 The school will ensure that it provides all discipline related communications [oral and written] required  
 95 in connection with this policy and procedure in a language the student and parent(s) understand. These  
 96 discipline related communications include notices, hearings, conferences, meeting, plans, proceedings,  
 97 agreements, petitions, and decisions. This effort may require language assistance for students and  
 98 parents with limited-English proficiency under Title VI of the Civil Rights Act of 1964. This effort may  
 99 require accommodations for parents and students with communication disabilities. For parents who are  
 100 unable to read any language, the school will provide written material orally.  
 101

### 102 **Supporting Students with Best Practices and Strategies**

103  
 104 The School will implement culturally responsive discipline that provides every student the opportunity  
 105 to achieve personal and academic success. The administration of other forms of discipline may involve  
 106 the use of best practices and strategies included in the state menu for behavior available online at:  
 107 [https://www.k12.wa.us/student-success/support-programs/learning-assistance-program-lap/menus-](https://www.k12.wa.us/student-success/support-programs/learning-assistance-program-lap/menus-best-practices-strategies/behavior-menu-best-practices-strategies)  
 108 [best-practices-strategies/behavior-menu-best-practices-strategies](https://www.k12.wa.us/student-success/support-programs/learning-assistance-program-lap/menus-best-practices-strategies/behavior-menu-best-practices-strategies). The school will take into  
 109 consideration the skills of school personnel and needs of students when identifying a continuum of best  
 110 practices and strategies school personnel should use to support students in meeting behavioral  
 111 expectations.  
 112

113 The School will ensure schools receive adequate support to effectively implement a continuum of  
 114 identified best practices and strategies that:

- 115
- 116 1. Focus on prevention to reduce the use of exclusionary discipline practices;
- 117 2. Allow the exercise of professional judgment and skill sets; and
- 118 3. May be adapted to individual student needs in a culturally responsive manner.  
 119

120 PCM will implement best practices and strategies consistent with this policy and procedure and the  
 121 School's -tiered System of Supports (MTSS) plan which utilized the Nautilus approach for behavior. In  
 122 accordance with WAC [392-400-110](#)(1)(e), the School has identified the following continuum of best  
 123 practices and strategies that school personnel should administer before or instead of exclusionary



124 discipline to support students in meeting behavioral expectations: . These best practices and processes  
 125 are detailed in the PCM Multi-tiered System of Supports (MTSS) plan.

126

127 At least annually, school personnel will review the identified best practices and strategies as well as  
 128 building discipline standards. The School will provide training for newly hired school personnel on  
 129 implementation of the identified best practices and strategies.

130

131 Unless a student's presence poses an immediate and continuing danger to others, or a student's  
 132 presence poses an immediate and continuing threat of material and substantial disruption to the  
 133 educational process, school personnel must first attempt one or more best practices and strategies to  
 134 support students in meeting behavioral expectations before considering imposing classroom exclusion,  
 135 short-term suspension, or in-school suspension. Before considering imposing a long-term suspension  
 136 or expulsion, school personnel must first consider one or more best practices and strategies.

137

138 When administering best practices and strategies in response to behavioral violations, school personnel  
 139 will follow this policy and procedure as well as building discipline standards.

140

#### 141 **Behavioral Violations**

142

143 Having sought the participation of school personnel, students, parents, families, and the community,  
 144 the School has developed definitions for the following behavioral violations, which clearly state the  
 145 types of behaviors for which discipline—including other forms of discipline, classroom exclusion,  
 146 suspension, and expulsion—may be administered: . These can be viewed in [PCM's Discipline Matrix](#).

147

148 The School will continue to further develop and/or revise the definitions for what constitutes behavioral  
 149 violations to reduce the effect of implicit or unconscious bias. In addition to these School definitions,  
 150 Head of School will confer with certificated building employees at least annually to develop and/or  
 151 review building discipline standards as stated in the Board Policy. This development of building  
 152 standards will also address differences in perceptions of subjective behaviors and reduce the effect of  
 153 implicit or unconscious bias.

154

155

#### 156 **Staff Authority and Exclusionary Discipline**

157 School staff members are responsible for supervising students immediately before and after the school  
 158 day; during the school day; during school activities (whether on or off campus); on school grounds  
 159 before or after school hours when a school group or school activity is using school grounds; off school  
 160 grounds, if the actions of the student materially or substantially affect or interferes with the educational  
 161 process; and on the school bus. Staff have the responsibility to provide a safe and supportive learning  
 162 environment for all students during school-related activities. In accordance with the Board's student  
 163 discipline policy, staff will administer discipline in ways that respond to the needs and strengths of  
 164 students, support students in meeting behavioral expectations, and keep students in the classroom to  
 165 the maximum extent possible.





166

167 Staff members will seek early involvement of parents in efforts to support students in meeting  
 168 behavioral expectations. The Head of School has general authority to administer discipline, including all  
 169 exclusionary discipline. If the School wants other staff members to have exclusionary discipline  
 170 authority, the procedure must identify by title. The Head of School designates disciplinary authority to  
 171 impose in-school suspension and short-term suspension to i.e. school principals, to impose long-term  
 172 suspension to i.e. school principals, Assistant Superintendents, to impose expulsion to i.e. school  
 173 principals, Assistant Superintendents, and to impose emergency removal to i.e. school principals,  
 174 Assistant Superintendents.

175

176 **Exclusions from transportation or extra-curricular activities and detention**

177

178 The Head of School is authorized to administer other forms of discipline that exclude a student from  
 179 transportation services or extracurricular activities or impose detention. For students who meet the  
 180 definition of homeless, the School will provide transportation according to 3115 –Students Experiencing  
 181 Homelessness – Enrollment Rights and Services modify policy number as accurate.

182

183 Authorized staff may administer lunch or afterschool detention for not more than *insert# minutes* on  
 184 any given day. Before assigning detention, the staff member will inform the student of the specific  
 185 behavioral violation prompting their decision to administer detention and provide the student with an  
 186 opportunity to share their perspective and explanation regarding the behavioral violation. At least one  
 187 school personnel will directly supervise students during the duration of any detention.

188

189 The School will not administer other forms of discipline in a manner that would result in the denial or  
 190 delay of a nutritionally adequate meal to a student or prevent a student from accomplishing a specific  
 191 academic grade, subject, or graduation requirements. The School will not exclude a student from  
 192 transportation services without providing access to alternative transportation the student needs to  
 193 participate fully in regular educational services or educational services provided during suspension or  
 194 expulsion.

195

196 Students and parents may challenge the administration of other forms of discipline, including  
 197 exclusions from transportation or extra-curricular activities and detentions using the School's grievance  
 198 procedures.

199

200 **Classroom exclusions**

201

202 After attempting at least one other form of discipline, as set forth in this procedure, teachers have  
 203 statutory authority to exclude a student from the teacher's classroom or instructional or activity area for  
 204 behavioral violations that disrupt the educational process while the student is under the teacher's  
 205 immediate supervision in accordance with this policy and procedure and building discipline standards. If  
 206 the School wants other staff members to have authority to administer classroom exclusion, the School  
 207 must identify by title. Otherwise, delete the following sentence. Additionally, the School authorizes



208 identify other staff, such as school principals and vice-principals or delete sentence to administer  
 209 classroom exclusion with the same authority and limits of authority as classroom teachers. As stated in  
 210 policy 3241, the Superintendent, school principals, and certificated staff will work together to develop  
 211 definitions and consensus on what constitutes behavioral violations that disrupt the educational process  
 212 to reduce the effect of implicit or unconscious bias.

213  
 214 Except for emergency circumstances, the teacher or other school personnel must first attempt one or  
 215 more other forms of discipline to support the student in meeting behavioral expectations before  
 216 considering using classroom exclusion. Classroom exclusion may be administered for all or any portion  
 217 of the balance of the school day. Classroom exclusion does not encompass removing a student from  
 218 school, including sending a student home early or telling a parent to keep a student at home, based on  
 219 a behavioral violation. Removing a student from school constitutes a suspension, expulsion, or  
 220 emergency removal and must include the required notification and due process outlined in the  
 221 procedures below.

222  
 223 The school will provide the student an opportunity to make up any assignments and tests missed  
 224 during a classroom exclusion. The School will not administer other forms of discipline or classroom  
 225 exclusions, in a manner that would result in the denial or delay of a nutritionally adequate meal to a  
 226 student or prevent a student from accomplishing a specific academic grade, subject, or graduation  
 227 requirements.

228  
 229 Following the classroom exclusion of a student, the teacher (or other school personnel as identified)  
 230 must report the classroom exclusion, including the behavioral violation that led to the classroom  
 231 exclusion, to the Head of School or the Head of School's designee as soon as reasonably possible. The  
 232 Head of School or designee must report all classroom exclusions, including the behavioral violation that  
 233 led to it to the Superintendent. Classroom exclusion under the behavioral violation category of "other"  
 234 is insufficient.

235  
 236 The teacher, principal, or the Head of School's designee must notify the student's parents regarding the  
 237 classroom exclusion as soon as reasonably possible. As noted above, the School must ensure that this  
 238 notification is in a language and form (i.e. oral or written) the parents understand.

239  
 240 When the teacher or other authorized school personnel administers a classroom exclusion because the  
 241 student's presence poses an immediate and continuing danger to other students or school personnel,  
 242 or an immediate and continuing threat of material and substantial disruption of the educational  
 243 process:

244  
 245 (a) The teacher or other school personnel must immediately notify the Head of School or the Head of  
 246 School's designee; and

247 (b) The Head of School or the Head of School's designee must meet with the student as soon as  
 248 reasonably possible and administer appropriate discipline.

249



250 The School will address student and parent grievances regarding classroom exclusion through the  
 251 School's following grievance procedures.

252

253 **Grievance procedures for classroom exclusion and other forms of discipline**

254

255 Any parent/guardian or student who is aggrieved by the administration of classroom exclusion and/or  
 256 other forms of discipline, including discipline that excludes a student from transportation or extra-  
 257 curricular activities and detention, has the right to an informal conference with the Head of School for  
 258 resolving the grievance. If the grievance pertains to the action of an employee, the School will notify  
 259 that employee of the grievance as soon as reasonably possible.

260

261 At such conference, the student and parent will have the opportunity to voice issues and concerns  
 262 related to the grievance and ask questions of staff members involved in the grievance matter. Staff  
 263 members will have opportunity to respond to the issues and questions related to the grievance matter.  
 264 Additionally, the Head of School will have opportunity to address issues and questions raised and to ask  
 265 questions of the parent, student, and staff members.

266

267 If after exhausting this remedy the grievance is not yet resolved, the parent and student will have the  
 268 right, upon two (2) school business days' prior notice, to present a written and/or oral grievance to the  
 269 Head of School or designee. The Head of School or designee will provide the parent and student with a  
 270 written copy of its response to the grievance within ten (10) school business days. Use of the grievance  
 271 process will not impede or postpone the disciplinary action, unless the Head of School or Head of  
 272 Schoolelects to postpone the disciplinary action.

273

274 Optional: Schools may adopt additional substantive and procedural protections for students by adding  
 275 such to this procedure, which reflects the minimum due process requirements for student discipline  
 276 established by state laws.

277

278 **Student disciplinary board**

279

280 The board recognizes that when a student's behavior is subject to disciplinary action, review by a panel  
 281 of the student's peers may positively influence the student's behavior. The board has discretion to  
 282 authorize the establishment of one or more student disciplinary boards, which may also include  
 283 teachers, administrators, parents, or any combination thereof. If so authorized, the School will ensure  
 284 that the student disciplinary board reflects the demographics of the student body. The student  
 285 disciplinary board may recommend to the appropriate school authority other forms of discipline that  
 286 might benefit the student's behavior and may also provide input on whether exclusionary discipline is  
 287 needed. The school authority has discretion to set aside or modify the student disciplinary board's  
 288 recommendation.

289

290 **Suspension and expulsion – general conditions and limitations**

291



292 The School's use of suspension and expulsion will have a real and substantial relationship to the lawful  
 293 maintenance and operation of the school School, including but not limited to, the preservation of the  
 294 health and safety of students and employees and the preservation of an educational process that is  
 295 conducive to learning. The School will not administer discipline, including suspension and expulsion, in  
 296 any manner related to a student's performance of or failure to perform any act not related to the  
 297 orderly operation of the school or school-sponsored activities or any other aspect of preserving the  
 298 educational process. The School will not administer any discipline, including suspension and expulsion,  
 299 in a manner that would result in the denial or delay of a nutritionally adequate meal to a student or  
 300 prevent a student from accomplishing a specific academic grade, subject, or graduation requirements.

301  
 302 The School will provide the parent(s) opportunity for involvement to support the student and resolve  
 303 behavioral violations before administering suspension or expulsion. Additionally, the Head of School or  
 304 designee must consider the student's individual circumstances and the nature of the violation before  
 305 administering any suspension or expulsion to determine whether the suspension or expulsion, and the  
 306 length of the exclusion, is warranted.

307  
 308 The Head of School or designee at each school must report all suspensions and expulsions, including  
 309 the behavioral violation that led to the suspension or expulsion, to the Head of School or designee  
 310 within twenty-four (24) hours after the administration. Suspension or expulsion under the behavioral  
 311 violation category of "other" is insufficient.

312  
 313 An expulsion or suspension of a student may not be for an indefinite period and must have an end  
 314 date.

315  
 316 After suspending or expelling a student, the School will make reasonable efforts to return the student  
 317 to the student's regular educational setting as soon as possible. Additionally, the School must allow the  
 318 student to petition for readmission at any time. The School will not administer any discipline in a  
 319 manner that prevents a student from completing subject, grade-level, or graduation requirements.

320  
 321 When administering a suspension or expulsion, the School may deny a student admission to, or entry  
 322 upon, real and personal property that the School owns, leases, rents, or controls. The School must  
 323 provide an opportunity for students to receive educational services during a suspension or expulsion in  
 324 accordance with WAC [392-400-610](#). The School will not suspend or expel a student from school for  
 325 absences or tardiness.

326  
 327 If during a suspension or expulsion the School enrolls a student in another program or course of study,  
 328 the School may not preclude the student from returning to the student's regular educational setting  
 329 following the end of the suspension or expulsion, unless one of the following applies:

330  
 331 The Head of School or designee grants a petition to extend a student's expulsion under WAC [392-400-](#)  
 332 [480](#); The change of setting is to protect victims under WAC [392-400-810](#); or  
 333 Other law precludes the student from returning to their regular educational setting.



334

335 **In-school suspension and short-term suspension – conditions and limitations**

336

337 The Head of School has the authority to administer in-school and short-term suspension. Before  
 338 considering administering an in-school or short-term suspension, staff members must have first  
 339 attempted one or more other forms of discipline to support the student in meeting behavioral  
 340 expectations. Before administering in-school or short-term suspension, the school will consider the  
 341 student's individual circumstances and the nature and circumstances of the behavioral violation to  
 342 determine whether the suspension and the length of the suspension, is warranted. The School will not  
 343 administer in-school or short-term suspension in a manner that would result in the denial or delay of a  
 344 nutritionally adequate meal to a student or prevent a student from accomplishing a specific academic  
 345 grade, subject, or graduation requirements.

346

347 The School is not required to impose in-school or short-term suspensions and instead, strives to keep  
 348 students in school, learning in a safe and appropriate environment. However, there are circumstances  
 349 when the School may determine that in-school or short-term suspension is appropriate. As stated in  
 350 this policy and procedure, the School will work to develop definitions and consensus on what  
 351 constitutes behavioral violations to reduce the effect of implicit or unconscious bias.

352

353 For students in kindergarten through fourth grade, the School will not administer in-school or short-  
 354 term suspension for more than ten (10) cumulative school days during any academic term. For students  
 355 in grades five through twelve, the School will not administer in-school or short-term suspension for  
 356 more than fifteen (15) cumulative school days during any single semester, or more than ten (10)  
 357 cumulative school days during any single trimester. Additionally, the School will not administer a short-  
 358 term or in-school suspension beyond the school year in which the behavioral violation occurred.

359

360 The School will not administer in-school or short-term suspensions in a manner that would result in the  
 361 denial or delay of a nutritionally adequate meal to a student.

362

363 When administering an in-school suspension, school personnel will ensure they are physically in the  
 364 same location as the student to provide direct supervision during the duration of the in-school  
 365 suspension. Additionally, school personnel will ensure they are accessible to offer support to keep the  
 366 student current with assignments and course work for all of the student's regular subjects or classes.

367

368 **Long-term suspensions and expulsions – conditions and limitations**

369

370 Before administering a long-term suspension or an expulsion, School personnel must consider other  
 371 forms of discipline to support the student in meeting behavioral expectations. The School must also  
 372 consider the other general conditions and limitations listed above.

373

374 Unless otherwise required by law, the School is not required to impose long-term suspension or  
 375 expulsion and may only administer long-term suspension or expulsion for specific severe behavioral



376 violations. In general, the School strives to keep students in school, learning in a safe and appropriate  
 377 environment. However, in accordance with the other parameters of this policy there are circumstances  
 378 when the School may determine that long-term suspension or expulsion is appropriate for behavioral  
 379 violations that meet the definitions provided under RCW [28A.600.015](#) (6)(a) through (d), which include:  
 380

- 381 1. Having a firearm on school property or school transportation in violation of RCW [28A.600.420](#);  
 382 2. Any of the following offenses listed in RCW [13.04.155](#), including:  
 383 any violent offense as defined in RCW [9.94A.030](#), including:  
 384 • any felony that Washington law defines as a class A felony or an attempt, criminal conspiracy, or  
 385 solicitation to commit a class A felony;  
 386 • manslaughter;  
 387 • indecent liberties committed by forcible compulsion;  
 388 • kidnapping;  
 389 • arson;  
 390 • assault in the second degree;  
 391 • assault of a child in the second degree;  
 392 • robbery;  
 393 • drive-by shooting; and  
 394 • vehicular homicide or vehicular assault caused by driving a vehicle while under the influence of  
 395 intoxicating liquor or any drug, or by operating a vehicle in a reckless manner.  
 396 • any sex offense as defined in RCW [9.94A.030](#), which includes any felony violation of chapter  
 397 [9A.44](#) RCW (other than failure to registered as a sex offender in violation of [9A.44.132](#)), including  
 398 rape, rape of a child, child molestation, sexual misconduct with a minor, indecent liberties,  
 399 voyeurism, and any felony conviction or adjudication with a sexual motivation finding;  
 400 • any weapons violation of chapter [9.41](#) RCW, including having a dangerous weapon at school in  
 401 violation of RCW [9.41.280](#); or  
 402 • unlawful possession or delivery, or both, of a controlled substance in violation of chapter [69.50](#)  
 403 RCW.  
 404 3. Two or more violations of the following within a three-year period  
 405 4.  
 406 ○ criminal gang intimidation in violation of RCW [9A.46.120](#);  
 407 ○ gang activity on school grounds in violation of RCW [28A.600.455](#);  
 408 ○ willfully disobeying school administrative personnel in violation of RCW [28A.635.020](#); and  
 409 ○ defacing or injuring school property in violation of RCW [28A.635.060](#); and  
 410  
 411 4. Any student behavior that adversely affects the health or safety of other students or educational  
 412 staff.  
 413

414 The School may only administer long-term suspension or expulsion for behavioral violations that meet  
 415 the definitions provided under RCW [28A.600.015](#)(6)(a) through (d) as outlined above, and after  
 416 determining that the student would pose an imminent danger to others or, in the case of long-term  
 417 suspension, an imminent threat of material and substantial disruption of the educational process should



418 they return to school before an imposed length of exclusion. Consistent with this policy and procedure,  
 419 the School will work to develop definitions and consensus on what constitutes an imminent danger or  
 420 imminent threat to reduce the effect of implicit or unconscious bias.

421  
 422 A long-term suspension may not exceed the length of an academic term. The School may not  
 423 administer a long-term suspension beyond the school year in which the behavioral violation occurred.

424  
 425 An expulsion may not exceed the length of an academic term, unless the Head of School grants a  
 426 petition to extend the expulsion under WAC [392-400-480](#). The School is not prohibited from  
 427 administering an expulsion beyond the school year in which the behavioral violation occurred.

428  
 429 In accordance with RCW [28A.600.420](#), a school School must expel a student for no less than one year if  
 430 the School has determined that the student has carried or possessed a firearm on school premises,  
 431 school-provided transportation, or areas of facilities while being used exclusively by public schools. The  
 432 Head of School may modify the expulsion on a case-by-case basis.

433  
 434 A school School may also suspend or expel a student for up to one year if the student acts with malice  
 435 (as defined under RCW [9A.04.110](#)) and displays an instrument that appears to be a firearm on school  
 436 premises, school-provided transportation, or areas of facilities while being used exclusively by public  
 437 schools. These provisions do not apply to students while engaged in a School authorized military  
 438 education; a School authorized firearms convention or safety course; or School authorized rifle  
 439 competition.

440  
 441 Except for a firearm violation under WAC [392-400-820](#), the School will not impose a long-term  
 442 suspension or an expulsion for any student in kindergarten through fourth grade.

443  
 444 If a long-term suspension or expulsion may exceed ten (10) days, the School will consider whether the  
 445 student is currently eligible or might be deemed eligible for special education services. If so, the Head  
 446 of School will notify relevant special education staff of the suspension or expulsion so that the School  
 447 can ensure it follows policy and procedure 2161 – Special Education and Related Services for Eligible  
 448 Students as well as this student discipline policy and procedure.

449  
 450 After suspending or expelling a student, the School will make reasonable efforts to return the student  
 451 to the student's regular educational setting as soon as possible.

452  
 453 **Suspensions and expulsions – initial hearing**  
 454

455 Before administering any suspension or expulsion, the School will attempt to notify the student's  
 456 parent(s) as soon as reasonably possible regarding the behavioral violation and the Head of School or  
 457 designee will conduct an informal initial hearing with the student to hear the student's perspective. At  
 458 the initial hearing, the Head of School or designee must provide the student an opportunity to contact  
 459 their parent(s), or, in the case of long-term suspension or expulsion, the Head of School or designee



460 must make a reasonable attempt to contact their parent(s) to provide an opportunity for the parents to  
 461 participate in the initial hearing in person or by telephone. The School must hold the initial hearing in a  
 462 language the student and parents understand.

463  
 464 At the initial hearing, the Head of School will provide the student:

- 465
- 466 • Notice of the student's violation of this policy;
  - 467 • An explanation of the evidence regarding the behavioral violation;
  - 468 • An explanation of the discipline that may be administered; and
  - 469 • An opportunity for the student to share their perspective and provide explanation regarding the  
 470 behavioral violation.

471  
 472 **Suspensions and expulsions – notice**

473  
 474 Following the initial hearing, the Head of School or designee will inform the student of the disciplinary  
 475 decision regarding the behavioral violation, including the date when any suspension or expulsion will  
 476 begin and end.

477  
 478 No later than one (1) school business day following the initial hearing with the student, the School will  
 479 provide written notice of the suspension or expulsion to the student and parents in person, by mail, or  
 480 by email in a language and form the student and parents will understand. The written notice must  
 481 include:

- 482
- 483 a. A description of the student's behavior and how the behavior violated this policy;
  - 484 b. The duration and conditions of the suspension or expulsion, including the dates on which the  
 485 suspension or expulsion will begin and end;
  - 486 c. The other forms of discipline that the School considered or attempted, and an explanation of  
 487 the School's decision to administer the suspension or expulsion;
  - 488 d. The opportunity to receive educational services during the suspension or expulsion;
  - 489 e. The right of the student and parent(s) to an informal conference with the Head of School or  
 490 designee; and
  - 491 f. The right of the student and parent(s) to appeal the suspension or expulsion; and
  - 492 g. For any long-term suspension or expulsion, the opportunity for the student and parents to  
 493 participate in a reengagement meeting.

494  
 495 **Emergency removals – conditions and limitations**

496  
 497 The School may immediately remove a student from the student's current school placement, subject to  
 498 the following requirements:

499  
 500 The School must have sufficient cause to believe that the student's presence poses:  
 501





- 502       • An immediate and continuing danger to other students or school personnel; or  
 503       • An immediate and continuing threat of material and substantial disruption of the educational  
 504       process.

505

506       The School may not impose an emergency removal solely for investigating student conduct.

507

508       For purposes of determining sufficient cause for an emergency removal, the phrase “immediate and  
 509       continuing threat of material and substantial disruption of the educational process” means:

510

- 511       • The student’s behavior results in an extreme disruption of the educational process that creates a  
 512       substantial barrier to learning for other students across the school day; and  
 513       • School personnel have exhausted reasonable attempts at administering other forms of discipline  
 514       to support the student in meeting behavioral expectations.

515

516       An emergency removal may not exceed ten consecutive school days. An emergency removal must end  
 517       or be converted to another form of discipline within ten (10) school days from its start.

518

519       If the School converts an emergency removal to a suspension or expulsion, the School must:

- 520       (a) Apply any days that the student was emergency removed before the conversion to the total length  
 521       of the suspension or expulsion; and  
 522       (b) Provide the student and parents with notice and due process rights under WAC [392-400-430](#)  
 523       through [392-400-480](#) appropriate to the new disciplinary action.

524

525       All emergency removals, including the reason the student’s presence poses an immediate and  
 526       continuing danger to other students or school personnel, must be reported to the Head of School or  
 527       designee within twenty-four (24) hours after the start of the emergency removal.

528

### 529       **Emergency removals – notice**

530

531       After an emergency removal, the School must attempt to notify the student’s parents, as soon as  
 532       reasonably possible, regarding the reason the School believes the student’s presence poses an  
 533       immediate and continuing danger to other students or school personnel, or an immediate and  
 534       continuing threat of material and substantial disruption of the education process.

535

536       Within twenty-four (24) hours after an emergency removal, the School will provide written notice to the  
 537       student and parents in person, by mail, or by email. The written notice must include:

538

- 539       • The reason the student’s presence poses an immediate and continuing danger to students or  
 540       school personnel, or poses an immediate and continuing threat of material and substantial  
 541       disruption of the educational process;  
 542       • The duration and conditions of the emergency removal, including the date on which the  
 543       emergency removal will begin and end;



- 544
- The opportunity to receive educational services during the emergency removal;
  - 545 • The right of the student and parent(s) to an informal conference with the Head of School or
  - 546 designee; and
  - 547 • The right of the student and parent(s) to appeal the emergency removal, including where and to
  - 548 whom the appeal must be requested.

549

550 Optional conference with Head of School

551

552 If a student or the parent(s) disagree with the School's decision to suspend, expel, or emergency  
 553 remove the student, the student or parent(s) may request an informal conference with the Head of  
 554 School or designee to resolve the disagreement. The parent or student may request an informal  
 555 conference orally or in writing.

556

557 The principal or designee must hold the conference within three (3) school business days after receiving  
 558 the request, unless otherwise agreed to by the student and parent(s).

559

560 During the informal conference, the student and parent(s) will have the opportunity to share the  
 561 student's perspective and explanation regarding the behavioral violation and the events that led to the  
 562 exclusion. The student and parent will also have the opportunity to confer with the principal or  
 563 designee and school personnel involved in the incident that led to the suspension or expulsion and  
 564 discuss other forms of discipline that the School could administer.

565

566 An informal conference will not limit the right of the student or parent(s) to appeal the suspension,  
 567 expulsion, or emergency removal, participate in a reengagement meeting, or petition for readmission.

568

## 569 **Appeals**

570

### 571 Requesting appeal

572 The appeal provisions for in-school and short-term suspension differ from those for long-term  
 573 suspension and expulsion. The appeal provisions for long-term suspension or expulsion and emergency  
 574 removal have similarities but the timelines differ.

575

576 A student or the parent(s) may appeal a suspension, expulsion, or emergency removal to the Head of  
 577 School or designee orally or in writing. For suspension or expulsion, the request to appeal must be  
 578 within five (5) school business days from when the School provided the student and parent with written  
 579 notice. For emergency removal, the request to appeal must be within three (3) school business days  
 580 from when the School provided the student and parent with written notice.

581

582 When an appeal for long-term suspension or expulsion is pending, the School may continue to  
 583 administer the long-term suspension or expulsion during the appeal process, subject to the following  
 584 requirements:

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- 594
- The suspension or expulsion is for no more than ten (10) consecutive school days from the initial hearing or until the appeal is decided, whichever is earlier;
  - The School will apply any days of suspension or expulsion occurring before the appeal is decided to the term of the student's suspension or expulsion and may not extend the term of the student's suspension or expulsion; and
  - If the student returns to school before the appeal is decided, the School will provide the student an opportunity to make up assignments and tests missed during the suspension or expulsion upon the student's return.

595 In-school and short-term suspension appeal

596 For short-term and in-school suspensions, the Superintendent or designee will provide the student and  
 597 parents the opportunity to share the student's perspective and explanation regarding the behavioral  
 598 violation orally or in writing.

599 The Head of School or designee must deliver a written appeal decision to the student and parent(s) in  
 600 person, by mail, or by email within two (2) school business days after receiving the appeal. The written  
 601 decision must include:

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- The decision to affirm, reverse, or modify the suspension;
  - The duration and conditions of the suspension, including the beginning and ending dates;
  - The educational services the School will offer to the student during the suspension; and
  - Notice of the student and parent(s)' right to request review and reconsideration of the appeal decision, including where and to whom to make such a request.

609 Long-term suspension or expulsion and emergency removal appeal

610 For long-term suspension or expulsion and emergency removals, the Head of School or designee will  
 611 provide the student and parent(s) written notice in person, by mail, or by email, within one (1) school  
 612 business day after receiving the appeal request, unless the parties agree to a different timeline. Written  
 613 notice will include:

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- The time, date, and location of the appeal hearing;
  - The name(s) of the official(s) presiding over the appeal;
  - The right of the student and parent(s) to inspect the student's education records;
  - The right of the student and parent(s) to inspect any documentary or physical evidence and a list of any witnesses that will be introduced at the hearing;
  - The rights of the student and parent(s) to be represented by legal counsel; question witnesses; share the student's perspective and explanation; and introduce relevant documentary, physical, or testimonial evidence; and
  - Whether the School will offer a reengagement meeting before the appeal hearing.

625 For long-term suspension or expulsion, the student, parent(s) and School may agree to hold a  
 626 reengagement meeting and develop a reengagement plan before the appeal hearing. The student,



627 parent(s), and School may mutually agree to postpone the appeal hearing while participating in the  
 628 reengagement process.

629

630 Hearings

631 A hearing to appeal a long-term suspension or expulsion or emergency removal is a quasi-judicial  
 632 process exempt from the Open Public Meetings Act (OPMA). To protect the privacy of student(s) and  
 633 others involved, the School will hold hearing without public notice and without public access unless the  
 634 student(s) and/or the parent(s) or their counsel requests an open hearing. Regardless of whether the  
 635 hearing is open or closed, the School will make reasonable efforts to comply with the Family  
 636 Educational Rights and Privacy Act (FERPA) concerning confidentiality of student education records.

637

638 When students are charged with violating the same rule and have acted in concert and the facts are  
 639 essentially the same for all students, a single hearing may be conducted for them if the hearing officer  
 640 believes that the following conditions exist:

641

- 642 • A single hearing will not likely result in confusion; and
- 643 • No student will have his/her interest substantially prejudiced by a group hearing.

644

645 If the official presiding over the hearing finds that a student's interests will be substantially prejudiced  
 646 by a group hearing, the presiding official may order a separate hearing for that student. The parent and  
 647 student have the right to petition for an individual hearing.

648 For long-term suspension or expulsion, the School will hold an appeal hearing within three (3) school  
 649 business days after the Head of School or designee received the appeal request, unless otherwise  
 650 agreed to by the student and parent(s).

651

652 For emergency removal, the School will hold an appeal hearing within two (2) school business days after  
 653 the Head of School or designee received the appeal request, unless the student and parent(s) agree to  
 654 another time.

655

656 The school board may designate a discipline appeal council to hear and decide any appeals in this  
 657 policy and procedure or to review and reconsider a School's appeal decisions. A discipline appeal  
 658 council must consist of at least three persons appointed by the school board for fixed terms. All  
 659 members of a discipline appeal council must be knowledgeable about the rules in Chapter 392-400  
 660 WAC and this policy and procedure. The school board may also designate the Head of School or a  
 661 hearing officer to hear and decide appeals. The presiding official(s) may not have been involved in the  
 662 student's behavioral violation or the decision to suspend or expel the student.

663

664 Upon request, the student and parent(s) or their legal representative may inspect any documentary or  
 665 physical evidence and list of any witnesses that the School will introduce at the appeal hearing. The  
 666 School must make the information available as soon as reasonably possible, but no later than the end  
 667 of the school business day before the appeal hearing. The School may also request to inspect any  
 668 documentary or physical evidence and list of any witnesses that the student and parent(s) intend to



669 introduce at the appeal hearing. The student and parent(s) must make this information available as  
 670 soon as reasonably possible, but no later than the end of the school business day before the appeal  
 671 hearing.

672  
 673 Upon request, the student and parent(s) may review the student's education records. The School will  
 674 make the records available as soon as reasonably possible, but no later than the end of the school  
 675 business day before the appeal hearing.

676  
 677 If a witness for the School cannot or does not appear at the appeal hearing, the presiding official(s) may  
 678 excuse the witness' nonappearance if the School establishes that:

- 679
- 680 • The School made a reasonable effort to produce the witness; and
  - 681 • The witness' failure to appear is excused by fear of reprisal or another compelling reason.

682  
 683 The School will record the appeal hearing by manual, electronic, or other type of recording device and  
 684 upon request of the student or parent(s) provide them a copy of the recording.

685  
 686 For long-term suspension or expulsion, the presiding official(s) must base the decision solely on the  
 687 evidence presented at the hearing. The presiding official(s) will provide a written decision to the student  
 688 and parent(s) in person, by mail, or by email within three (3) school business days after the appeal  
 689 hearing. The written decision must include:

- 690
- 691 • The findings of fact;
  - 692 • A determination whether (i) the student's behavior violated this policy; (ii) the behavioral  
 693 violation reasonably warrants the suspension or expulsion and the length of the suspension or  
 694 expulsion; and (iii) the suspension or expulsion is affirmed, reversed, or modified;
  - 695 • The duration and conditions of suspension or expulsion, including the beginning and ending  
 696 dates;
  - 697 • Notice of the right of the student and parent(s) to request a review and reconsideration of the  
 698 appeal decision. The notice will include where and to whom to make such a request; and
  - 699 • Notice of the opportunity for a reengagement meeting and contact information for the person  
 700 who will schedule it.

701  
 702 For emergency removal, the School will provide a written decision to the student and parent(s) in  
 703 person, by mail, or by email within one (1) school business day after the appeal hearing. The written  
 704 decision must include:

- 705
- 706 • The findings of fact;
  - 707 • A determination whether the student's presence continues to pose (i) an immediate and  
 708 continuing danger to students or school personnel; or (ii) an immediate and continuing threat of  
 709 material and substantial disruption of the educational process;



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- Whether the School will end the emergency removal or convert the emergency removal to a suspension or expulsion. If the School converts the emergency removal to a suspension or expulsion, the School will provide the student and parent(s) notice and due process consistent with the disciplinary action to which the emergency removal was converted; and
  - Notice of the right of the student and parent(s) to request a review and reconsideration of the appeal decision. The notice will include where and to whom to make such a request.

717 **Reconsideration of appeal**

718

719 The student or parents may request the school board or discipline appeal council, if established by the  
 720 school board, review and reconsider the School's appeal decision for long-term suspensions or  
 721 expulsions and emergency removals. This request may be either oral or in writing.

722

723 For long-term suspension, short-term suspension, or expulsion, the student or parent(s) may request a  
 724 review within ten (10) school business days from when the School provided the student and parent(s)  
 725 with the written appeal decision.

726

727 For emergency removal, the student or parent(s) may request a review within five (5) school business  
 728 days from when the School provided the student and parent(s) with the written appeal decision.

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- In reviewing the School's decision, the school board or discipline appeal council, if established, must consider (i) all documentary and physical evidence from the appeal hearing related to the behavioral violation; (ii) any records from the appeal hearing; (iii) relevant state law; and (iv) this policy adopted.
  - The school board (or discipline appeal council) may request to meet with the student and parent(s), the principal, witnesses, and/or school personnel to hear further arguments and gather additional information.
  - The decision of the school board (or discipline appeal council) will be made only by board or discipline council members who were not involved in (i) the behavioral violation; (ii) the decision to suspend or expel the student; or (iii) the appeal decision. If the discipline appeal council presided over the appeal hearing, the school board will conduct the review and reconsideration.

742 For long-term suspension, short-term suspension, or expulsion, the school board (or discipline appeal  
 743 council) will provide a written decision to the student and parent(s) in person, by mail, or by email  
 744 within ten (10) school business days after receiving the request for review and reconsideration. The  
 745 written decision must identify:

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- Whether the school board (or discipline appeal council) affirms, reverses, or modifies the suspension or expulsion;
  - The duration and conditions of the suspension or expulsion, including the beginning and ending dates of the suspension or expulsion; and



- 751 • For long-term suspensions or expulsions, notice of the opportunity to participate in a  
 752 reengagement meeting.

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 754 For emergency removal, the school board (or discipline appeal council) will provide a written decision to  
 755 the student and parent(s) in person, by mail, or by email within five (5) school business days after  
 756 receiving the request for review and reconsideration. The written decision must identify:

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 758 • Whether the school board [or discipline appeal council] affirms or reverses the school's decision  
 759 that the student's presence posed (i) an immediate and continuing danger to students or school  
 760 personnel; or (ii) an immediate and continuing threat of material and substantial disruption of  
 761 the educational process.  
 762 • If the emergency removal has not yet ended or been converted, whether the School will end the  
 763 emergency removal or convert the emergency removal to a suspension or expulsion. If the  
 764 School converts the emergency removal to a suspension or expulsion, the School will provide  
 765 the student and parent(s) notice and due process under WAC [392-400-430](#) through [392-400-](#)  
 766 [480](#) consistent with the disciplinary action to which the emergency removal was converted  
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768 **Petition to extend an expulsion**  
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770 When risk to public health or safety warrants extending a student's expulsion, the Head of School may  
 771 petition the School Board for authorization to exceed the academic term limitation on an expulsion. The  
 772 petition must inform the School Board or designee of:

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 774 • The behavioral violation that resulted in the expulsion and the public health or safety concerns;  
 775 • The student's academic, attendance, and discipline history;  
 776 • Any nonacademic supports and behavioral services the student was offered or received during  
 777 the expulsion;  
 778 • The student's academic progress during the expulsion and the educational services available to  
 779 the student during the expulsion;  
 780 • The proposed extended length of the expulsion; and  
 781 • The student's reengagement plan.  
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783 The Head of School may petition to extend an expulsion only after the development of a reengagement  
 784 plan under WAC [392-400-710](#) and before the end of the expulsion. For violations of WAC [392-400-820](#)  
 785 involving a firearm on school premises, school-provided transportation, or areas of facilities while being  
 786 used exclusively by public schools, the principal or designee may petition to extend an expulsion at any  
 787 time.

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 789 Notice

790 The school will provide written notice of a petition to the student and parent(s) in person, by mail, or by  
 791 email within one (1) school business day from the date the School Board received the petition. The  
 792 written notice must include:



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- A copy of the petition;

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- The right of the student and parent(s) to an informal conference with the Head of School or designee to be held within five (5) school business days from the date the School provided written notice to the student and parent(s); and

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- The right of the student and parent(s) to respond to the petition orally or in writing to the Head of School or designee within five (5) school business days from the date the School provided the written notice.

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The School Board may grant the petition only if there is substantial evidence that, if the student were to return to the student's previous school of placement after the length of an academic term, the student would pose a risk to public health or safety. The School Board or designee must deliver a written decision to the Head of School, the student, and the student's parent(s) in person, by mail, or by email within ten (10) school business days after receiving the petition.

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If the School Board does not grant the petition, the written decision must identify the date when the expulsion will end.

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If the School Board or designee grants the petition, the written decision must include:

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- The date on which the extended expulsion will end;
- The reason that, if the student were to return before the initial expulsion end date, the student would pose a risk to public health or safety; and
- Notice of the right of the student and parent(s) to request a review and reconsideration. The notice will include where and to whom to make such a request;

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#### Review and Reconsideration of extension of expulsion

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The student or parent(s) may request that the school board (or discipline appeal council, if established by the board) review and reconsider the decision to extend the student's expulsion. The student or parents may request the review orally or in writing within ten (10) school business days from the date the Head of School or designee provides the written decision.

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The school board (or discipline appeal council) may request to meet with the student or parent(s) or the Head of School to hear further arguments and gather additional information.

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The decision of the school board (or discipline appeal council) may be made only board or discipline appeal council members who were not involved in the behavioral violation, the decision to expel the student, or the appeal decision.

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The school board (or discipline appeal council) will provide a written decision to the student and parent(s) in person, by mail, or by email within ten (10) school business days after receiving the request for review and reconsideration. The written decision must identify:

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- Whether the school board or discipline appeal council affirms, reverses, or modifies the decision to extend the student's expulsion; and

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- The date when the extended expulsion will end.

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840 Any extension of an expulsion may not exceed the length of an academic term.

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843 The School will annually report the number of petitions approved and denied to the Office of the Superintendent of Public Instruction.

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### 845 **Educational Services**

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848 The School will offer educational services to enable a student who is suspended, expelled or emergency removed to:

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- Continue to participate in the general education curriculum;
- Meet the educational standards established within the School; and
- Complete subject, grade-level, and graduation requirements.

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855 When providing a student the opportunity to receive educational services during exclusionary discipline, the school must consider:

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- Meaningful input from the student, parents, and the student's teachers;
- Whether the student's regular educational services include English language development services, special education, accommodations and related services under Section 504 of the Rehabilitation Act of 1973, or supplemental services designed to support the student's academic achievement; and
- Access to any necessary technology, transportation, or resources the student needs to participate fully in the educational services.

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866 After considering the factors and input described above, the school will determine a student's educational services on a case-by-case basis. The types of educational services the School will consider include one-on-one tutoring (when available), and online learning tutoring. Any educational services in an alternative setting should be comparable, equitable, and appropriate to the regular educational services a student would have received in the absence of exclusionary discipline.

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872 As soon as reasonably possible after administering a suspension or expulsion, the School will provide written notice to the student and parents about the educational services the School will provide. The notice will include a description of the educational services and the name and contact information of the school personnel who can offer support to keep the student current with assignments and course work.

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877 For students subjected to suspension or emergency removal up to five (5) days, a school must provide  
 878 at least the following:

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- 880 • Course work, including any assigned homework, from all of the student's regular subjects or
  - 881 classes;
  - 882 • Access to school personnel who can offer support to keep the student current with assignments
  - 883 and course work for all of the student's regular subjects or classes; and
  - 884 • An opportunity for the student to make up any assignments and tests missed during the period
  - 885 of suspension or emergency removal.

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887 For students subjected to suspension or emergency removal for six (6) to ten (10) consecutive school  
 888 days, a school must provide at least the following:

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- 890 • Course work, including any assigned homework, from all of the student's regular subjects or
  - 891 classes;
  - 892 • An opportunity for the student to make up any assignments and tests missed during the period
  - 893 of suspension or emergency removal; and
  - 894 • Access to school personnel who can offer support to keep the student current with assignments
  - 895 and course work for all of the student's regular subjects or classes. School personnel will make a
  - 896 reasonable attempt to contact the student or parents within three (3) school business days
  - 897 following the start of the suspension or emergency removal and periodically thereafter until the
  - 898 suspension or emergency removal ends to:
    - 899 ○ Coordinate the delivery and grading of course work between the student and the
    - 900 student's teacher(s) at a frequency that would allow the student to keep current with
    - 901 assignments and course work for all of the student's regular subjects or classes; and
    - 902 ○ Communicate with the student, parents, and the student's teacher(s) about the student's
    - 903 academic progress.

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905 For students subject to expulsion or suspension for more than ten (10) consecutive school days, a  
 906 school will make provisions for educational services in accordance with the "Course of Study" provisions  
 907 of WAC [392-121-107](#).

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909 **Readmission**

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911 **Readmission application process**

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913 The readmission process is different from and does not replace the appeal process. Students who have  
 914 been suspended or expelled may make a written request for readmission to the school at any time. If a  
 915 student desires to be readmitted at the school from which he/she has been suspended/expelled, the  
 916 student will submit a written application to the Head of School, who will recommend admission or non-  
 917 admission. If a student wishes admission to another school, he/she will submit the written application to  
 918 the Head of School. The application will include:



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- The reasons the student wants to return and why the request should be considered;

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- Any evidence that supports the request; and

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- A supporting statement from the parent or others who may have assisted the student.

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The Head of School will advise the student and parent of the decision within seven (7) school days of the receipt of such application.

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### **Reengagement**

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#### **Reengagement Meeting**

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The reengagement process is distinct from a written request for readmission. The reengagement

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meeting is also distinct from the appeal process, including an appeal hearing, and does not replace an

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appeal hearing. The School must convene a reengagement meeting for students with a long-term

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suspension or expulsion.

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Before convening a reengagement meeting, the School will communicate with the student and

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parent(s) to schedule the meeting time and location. The purpose of the reengagement meeting is to

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discuss with the student and parent(s) a plan to reengage the student.

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The reengagement meeting must occur:

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- Within twenty (20) calendar days of the start of the student's long-term suspension or expulsion, but no later than five (5) calendar days before the student's return to school; or

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- As soon as reasonably possible, if the student or parents request a prompt reengagement meeting.

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#### **Reengagement plan**

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The School will collaborate with the student and parents to develop a culturally sensitive and culturally

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responsive reengagement plan tailored to the student's individual circumstances to support the student

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in successfully returning to school. In developing a reengagement plan, the School must consider:

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- The nature and circumstances of the incident that led to the student's suspension or expulsion;

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- As appropriate, students' cultural histories and contexts, family cultural norms and values, community resources, and community and parent outreach;

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- Shortening the length of time that the student is suspended or expelled;

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- Providing academic and nonacademic supports that aid in the student's academic success and keep the student engaged and on track to graduate; and

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- Supporting the student parents, or school personnel in taking action to remedy the circumstances that resulted in the suspension or expulsion and preventing similar circumstances

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- from recurring.

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962 The School must document the reengagement plan and provide a copy of the plan to the student and  
 963 parents. The School must ensure that both the reengagement meeting and the reengagement plan are  
 964 in a language the student and parents understand.

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### 966 **Behavior agreements**

967 The School authorizes the any Montessori Guides, in collaboration with the Nautilus lead, to enter into  
 968 behavior agreements with students and parents in response to behavioral violations, including  
 969 agreements to reduce the length of a suspension conditioned on the participation in treatment services,  
 970 agreements in lieu of suspension or expulsion, or agreements holding a suspension or expulsion in  
 971 abeyance. Behavior agreements will also describe School actions planned to support students in  
 972 meeting behavioral expectations. Behavior agreements may be supplemental to but will not replace  
 973 best practices and strategies implemented at the classroom level to support students in meeting  
 974 behavioral expectations. Behavior agreements entered into with students and parents under this section  
 975 may not replace or negate provisions within a student's Individual Education Plan (IEP), 504 Plan, or  
 976 Behavioral Intervention Plan (BIP). The School will provide any behavior agreement in a language and  
 977 form the student and parents understand, which may require language assistance for students and  
 978 parents with limited-English proficiency under Title VI of the Civil Rights Act of 1964.

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980 A behavior agreement does not waive a student's opportunity to participate in a reengagement  
 981 meeting or to receive educational services. The duration of a behavior agreement must not exceed the  
 982 length of an academic term. A behavior agreement does not preclude the School from administering  
 983 discipline for behavioral violations that occur after the School enters into an agreement with the  
 984 student and parents.

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### 986 **Exceptions for protecting victims**

987 The School may preclude a student from returning to the student's regular educational setting  
 988 following the end date of a suspension or expulsion to protect victims of certain offenses as follows:

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- 990 • A student committing an offense under RCW 28A.600.460(2), when the activity is directed  
 991 toward the teacher, shall not be assigned to that teacher's classroom for the duration of the  
 992 student's attendance at that school or any other school where the teacher is assigned;
- 993 • A student who commits an offense under RCW 28A.600.460(3), when directed toward another  
 994 student, may be removed from the classroom of the victim for the duration of the student's  
 995 attendance at that school or any other school where the victim is enrolled.

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# Coversheet

## Policy & Procedure Updates: Restraint, Isolation, and Other Uses of Reasonable Force (3246P)

**Section:** V. Other Business  
**Item:** H. Policy & Procedure Updates: Restraint, Isolation, and Other Uses of Reasonable Force (3246P)  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 3246P-Isolation and restraint procedure.docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Restraint, Isolation, and Other Uses of Reasonable Force (3246P).

**Description of Changes:** This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 3207P as presented.



**POLICY #3246P**

**Restraint, Isolation and Other Uses of Reasonable Force Procedure**

**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 5/2021, WSSDA: 3/2016

**Prior Revised Dates** – WSSDA: 12/2008, 12/2011, 07/2013, 09/2013, 12/2013, 07/2015, 12/2021, 07/2023

This procedure is intended to apply to a broad range of circumstances whenever it is deemed reasonably necessary by Pullman Community Montessori (PCM) school staff to control spontaneous behavior by any student that poses an imminent likelihood of serious harm. This procedure is intended to be interpreted consistent with the requirements of RCW 28A.600.485, RCW 9A.16.020, RCW 9A.16.100, RCW 28A.160.300, RCW 28A.155.210, WAC 392-400-235, and, for students with an IEP, consistent with the regulations of Chapter 392-172A, WAC.

**Definitions:**

- **Behavioral intervention plan:** A plan incorporated into a student's Individualized Education Program (IEP), which at a minimum describes: 1)The pattern of behavior that impedes the student's learning or the learning of others; 2)The instruction and/or environmental conditions or circumstances that contribute to the pattern of behavior(s) being addressed by the IEP team; 3)The positive behavioral interventions and supports to: i) reduce the pattern of behavior(s) that impedes the student's learning or the learning of others and increases the student's desired prosocial behaviors: and ii) ensure the consistency of the implementation of the positive behavioral interventions across the student's school-sponsored instruction or activities); and d)The skills that will be taught and monitored as alternatives to challenging behavior(s) for a specific pattern of behavior of the student.
- **Chemical spray:** Pepper spray, OC spray, or other similar chemicals that are used to control a student or limit a student's freedom of movement.
- **De-escalation:** The use of positive behavioral interventions and other school-approved strategies to defuse a student who has lost self-control, is non-compliant or is demonstrating unacceptable behavior. These strategies address behavior that is dangerous, disruptive or otherwise impedes the learning of a student or others.
- **Imminent:** The state or condition of being likely to occur at any moment or near at hand, rather than distant or remote.
- **Isolation:** Restricting a student alone within a room or any other form of enclosure, from which the student may not leave. It does not include a student's voluntary use of a quiet space for self-calming, or temporary removal of a student from his or her regular instructional area to an unlocked area for purposes of carrying out an appropriate positive behavior intervention plan.
- **Likelihood of serious harm:** A substantial risk that physical harm will be inflicted by a student:



- 40                   ○ upon his or her own person, as evidenced by threats or attempts to commit suicide or  
 41                   inflict physical harm on oneself;  
 42                   ○ upon another, as evidenced by behavior that has caused such harm or that places  
 43                   another person or persons in reasonable fear of sustaining such harm;  
 44                   ○ upon the property of others, as evidenced by behavior that has caused substantial loss  
 45                   or damage to the property of others; or  
 46                   ○ after the student has threatened the physical safety of another and has a history of one  
 47                   or more violent acts.
- 48       • **Physical force:** The use of bodily force or physical restriction that substantially immobilizes or  
 49       reduces the free movement of a student.
  - 50       • **Positive behavioral interventions:** Strategies and instruction that can be implemented in a  
 51       strategic manner in order to provide alternatives to challenging behaviors, reinforce desired  
 52       behaviors, and reduce or eliminate the frequency and severity of challenging behaviors. Positive  
 53       behavioral interventions include the consideration of environmental factors that may trigger  
 54       challenging behaviors and teaching a student the skills to manage his or her own behavior.
  - 55       • **Restraint:** Physical intervention or force used to control a student, including the use of a  
 56       restraint device. It does not include appropriate use of a prescribed medical, orthopedic or  
 57       therapeutic device when used as intended, such as to achieve proper body position, balance or  
 58       alignment or to permit a student to safely participate in activities.
  - 59       • **Restraint device:** A device used to assist in controlling a student, including, but not limited to  
 60       metal handcuffs, plastic ties, ankle restraints, leather cuffs, other hospital-type restraints, pepper  
 61       spray, tasers or batons. Restraint device does not mean a seat harness used to safely transport  
 62       students. This definition is consistent with RCW 28A.600.485 (1)(c), and is not intended to  
 63       endorse or encourage the use of such devices or techniques with school students.
  - 64       • **School police officer:** An employee of the school responsible for security services in the school  
 65       under the direction of a school administrator, but who also is a commissioned officer.
  - 66       • **School resource officer:** A commissioned law enforcement officer who provides law  
 67       enforcement services and may perform other duties for the school, and is assigned by the  
 68       employing police department or agency to work in collaboration with the school.
  - 69       • **School security officer:** A classified or contracted school employee other than a school  
 70       resource officer who provides security services in the school under the direction of a school  
 71       administrator.
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- 73       **General use of restraint, isolation, or other forms of reasonable force:**
- 74       • Restraint, isolation, or other forms of reasonable force may be used to prevent or minimize  
 75       imminent bodily harm to self or others, or if de-escalation or other positive behavioral  
 76       interventions fail or are inappropriate, to protect school property, where there is an “imminent  
 77       likelihood of such serious harm” occurring, as defined above.
  - 78       • Restraint, isolation, or other forms of reasonable physical force may be used when a student has  
 79       caused a substantial loss or damage to the property of others, and the student’s behavior poses  
 80       a substantial risk that such property damage will be inflicted.





- 81 • Restraint devices may be used as needed to obtain possession of a known or reasonably-
- 82 suspected weapon or other dangerous object on a person or within the control of a person.
- 83 • An IEP or plan developed under Section 504 of the Rehabilitation Act of 1973 must include
- 84 procedures for notification of a parent or guardian regarding the use of restraint or isolation
- 85 under RCW 28A.600.485. The IEP or Section 504 plan must not include the use of restraint or
- 86 isolation as a planned behavior intervention unless a student's individual needs require more
- 87 specific advanced education planning and the student's parent or guardian agrees. Nothing in
- 88 these procedures is intended to limit the provision of a free appropriate public education (FAPE)
- 89 under Part B of the Individuals with Disabilities Act (IDEA) or Section 504 of the Rehabilitation
- 90 Act of 1973.
- 91 • If a student is receiving special education services through placement in an authorized entity
- 92 under RCW 28A.155.060, the student's IEP must also specify any additional procedures required
- 93 to ensure the authorized entity fully complies with the state law governing the use of restraint
- 94 and isolation.
- 95 • Restraint, isolation, or other forms of reasonable physical force will not be used as a form of
- 96 discipline or punishment.
- 97 • Restraint, isolation, or other forms of reasonable physical force will not be used as an initial
- 98 response to destruction of property, school disruption, refusal of the student to comply with
- 99 school rules or a staff directive; or a verbal threat that does not constitute a threat of imminent
- 100 bodily injury, unless other forms of de-escalation and positive behavioral interventions fail or are
- 101 inappropriate.
- 102 • Restraint, isolation, or other forms of reasonable physical force should not be used as an
- 103 intervention if the school employee, school resource officer or school security officer knows that
- 104 the student has a health condition or physical problem and the condition or problem would be
- 105 exacerbated by the use of such techniques.
- 106

**Practices presumed to be unreasonable when correcting or restraining any child (RCW 9A.16.100):**

Under RCW 9A.16.100, the following is a non-exclusive list of acts that are presumed unreasonable when correcting or restraining a child:

- 111 • throwing, kicking, burning, or cutting a child;
- 112 • striking a child with a closed fist;
- 113 • shaking a child under age three;
- 114 • interfering with a child's breathing;
- 115 • threatening a child with a deadly weapon; or
- 116 • doing any other act that is likely to cause bodily harm to a student greater than transient pain or
- 117 minor temporary marks.
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This non-exclusive list should not be read so as to imply that another, unlisted form of correction or restraint is permissible. Whether or not an unlisted use of force or restraint is presumptively permissible depends upon a balanced consideration of all relevant state laws and regulations, and whether the use is reasonable under the totality of the circumstances.



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124 **Conditions specific to use of isolation with students eligible for special education (consistent**  
 125 **with WAC 392-172A-02110):**

126 The isolation enclosure will be ventilated, lighted and temperature controlled from inside or outside for  
 127 purposes of human occupancy.

- 128 • The isolation enclosure will permit continuous visual monitoring of the student from outside the  
 129 enclosure.
- 130 • An adult responsible for supervising the student will remain in visual or auditory range of the  
 131 student at all times.
- 132 • Either the student shall be capable of releasing himself or herself from the enclosure, or the  
 133 student shall continuously remain within view of an adult responsible for supervising the  
 134 student.
- 135 • Any staff member or other adults using isolation, restraint, or a restraint device must be trained  
 136 and currently certified by a qualified provider in the use of trauma-informed crisis intervention  
 137 (including de-escalation techniques) and the safe use of isolation, unless trained personnel are  
 138 not immediately available due to the unforeseeable nature of the emergency.

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140 **Prohibited practices involving restraint, use of force, and discipline specifically for students**  
 141 **eligible for special education (consistent with WAC 392-172A-02076):**

142 The following practices are prohibited with students eligible for special education services:

- 143 • School personnel are prohibited from using aversive interventions with a student;
- 144 • School personnel are prohibited from physically restraining or isolating any student, except  
 145 when the student's behavior poses an imminent likelihood of serious harm as defined above;
- 146 • No student may be stimulated by contact with electric current, including, but not limited to,  
 147 tasers;
- 148 • A student may not be denied or subjected to an unreasonable delay in the provision of food or  
 149 liquid from when the food or liquid is customarily served as a form of punishment;
- 150 • A student may not be the recipient of force or restraint that is either unreasonable under the  
 151 circumstances or deemed to be an unreasonable form of corporal punishment as a matter of  
 152 state law (see above, for example, for a list of practices presumed to be unreasonable when used  
 153 in correcting or restraining a child);
- 154 • A student must not be denied or subjected to an unreasonable delay in the provision of  
 155 common hygiene care;
- 156 • A student must not be denied or subjected to an unreasonable delay in the provision of  
 157 medication;
- 158 • A student may not be excluded from his or her regular instructional or service area and isolated  
 159 within a room or any other form of enclosure, except under the conditions set forth in WAC 392-  
 160 172A-02110;
- 161 • A student must not be forced to listen to noise or sound that the student finds painful;
- 162 • A student must not be forced to smell or be sprayed in the face with a noxious or potentially  
 163 harmful substance;



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- A student must not be forced to taste or ingest a substance which is not commonly consumed or which is not commonly consumed in its existing form or concentration;
  - A student's head must not be partially or wholly submerged in water or any other liquid.
  - A student must not be physically restrained or immobilized by binding or otherwise attaching the student's limbs together or by binding or otherwise attaching any part of the student's body to an object or against a wall or the floor, except under the conditions set forth in WAC 392-172A.02110.;
  - A student must not be subjected to the use of prone (lying face-down) or supine (lying face-up) restraint, wall restraint, or any restraint that interferes with the student's breathing.

174 **Degree of force:**

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- Restraint, isolation, or other forms of reasonable physical force will be discontinued as soon as a determination is made by the staff member administering the restraint, isolation, or other forms of reasonable physical force that the likelihood of serious harm has dissipated.
  - Restraint, isolation, or other forms of reasonable physical force must be administered in such a way so as to prevent or minimize physical harm to the student. If, at any time during the use of restraint, isolation, or other forms of reasonable physical force, the student demonstrates significant physical distress, the technique must be reduced immediately and, if necessary, school staff must take immediate steps to seek medical assistance.

184 **Monitoring:**

185 An adult must continually monitor any student when restraint, isolation, or other forms of reasonable  
 186 physical force is used. The monitoring must be conducted by continuous visual monitoring of the  
 187 student. Monitoring must include regularly evaluating the student for signs of physical distress  
 188

189 **Post-incident notification and review with parent/guardian:**

190 Within twenty-four (24) hours following the use of restraint, isolation, or other forms of reasonable  
 191 physical force with a student, the principal or designee must make a reasonable effort to verbally inform  
 192 the student's parent or guardian of the incident. The principal or designee must also send written  
 193 notification as soon as practical, but postmarked no later than five (5) business days after restraint,  
 194 isolation, or other forms of reasonable physical force has been used with a student. If the school or  
 195 school customarily provides the parent or guardian with school-related information in a language or  
 196 mode of communication other than English, the written report must be provided to the parent or  
 197 guardian in that language or mode of communication.  
 198

199 The principal or designee will review the incident with the student and the parent or guardian (though  
 200 not necessarily at the same time) to address the behavior that precipitated the use of the technique and  
 201 the appropriateness of the response. The principal or designee will review the incident with the staff  
 202 person(s) who administered the restraint, isolation, or other forms of reasonable physical force to  
 203 discuss whether proper procedures were followed and what staff training or support is needed to help  
 204 the student avoid similar incidents.  
 205



206 IEPs and 504 plans will include the above procedures for notification of parents/guardians regarding the  
 207 use of isolation and restraint on their student.

208

209 **Incident report:**

210 Any school employee, school resource officer or school security officer who uses restraint, isolation, or  
 211 other forms of reasonable physical force, as defined in this procedure, on any student during school-  
 212 sponsored instruction or activities, will inform the principal or a designee as soon as possible and within  
 213 two (2) business days submit a written report of the incident to the school office. The written report will  
 214 contain, at a minimum:

215

- 216 • The date and time of the incident;
- 217 • The name and job title of the staff member who administered the restraint, isolation, or other  
 218 form of reasonable physical force;
- 219 • A description of the activity that led to the restraint, isolation, or other form of reasonable  
 220 physical force;
- 221 • The type of restraint, isolation, or other forms of reasonable physical force used on the student,  
 222 and the duration;
- 223 • Whether the student or staff was physically injured during incident involving restraint, isolation,  
 224 or other forms of reasonable physical force;
- 225 • Any medical care provided to the student or staff; and
- 226 • Any recommendations for changing the nature or amount of resources available to the student  
 227 and staff members in order to avoid similar incidents.

228

229 **Resolution of concerns about the use of force incident:**

230 A student or his/her parent or guardian who has concerns regarding a specific incident involving  
 231 restraint, isolation, or other forms of reasonable physical force may seek to resolve the concern by using  
 232 the school's complaint process which is set forth in Policy 4220, Complaints Concerning Staff or  
 233 Programs.

234

235 **Providing parents/guardians with Restraint, Isolation, and Other Uses of Reasonable Force policy:**

236 The school will make available to all parents/guardians of students the school's policy on Restraint,  
 237 Isolation and Other Use of Reasonable Force. If the student has an IEP or 504 plan, the School will  
 238 provide the parents/guardians a copy of the policy each time an initial or annual IEP or 504 plan is  
 239 developed.

240

241 **Staff training requirements:**

242 All training will include instruction in positive management of student behavior, cultural sensitivity,  
 243 effective communication for defusing and de-escalating disruptive or dangerous behavior and safe and  
 244 appropriate use of force, isolation and restraint. Annually, administrators will provide all staff with the  
 245 school established policy and procedure regarding the use of reasonable force.

246

247 All staff should be informed of de-escalation strategies and proper physical intervention procedures.



248 Appropriate staff and those who are required or reasonably anticipated to provide physical force  
 249 intervention will be trained in the use of physical force intervention.

250  
 251 Only staff trained by a qualified provider and authorized to use isolation, restraint, restraint devices or  
 252 chemical spray procedures will administer it to students. The appropriate personnel will include those  
 253 staff members who are most likely to be called upon to use isolation, restraint, restraint devices or  
 254 chemical spray to prevent or address disruptive or dangerous student behavior.

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**Submission of incident reports to the Office of Superintendent of Public Instruction:**

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 259 Beginning January 1, 2016 and annually by January 1 thereafter, the school will summarize the written  
 260 incident reports described above and submit those summaries to OSPI. The summaries will include:

- 261
- 262 • the number of individual incidents of restraint and isolation;
  - 263 • the number of students involved in the incidents;
  - 264 • the number of injuries to students and staff; and
  - 265 • the types of restraint or isolation used.

266  
 267

**Annual Report:**

268 The building administrator or a designee will maintain a log of all instances of use of force as defined by  
 269 this procedure, which will be presented to the Head of School annually. The Head of School will provide  
 270 an annual report to the board regarding the school's use of force.

271

272 Legal References: NA

273

274 Cross References: NA

# Coversheet

## Policy & Procedure Updates: Section 504 (2162P)

**Section:** V. Other Business  
**Item:** I. Policy & Procedure Updates: Section 504 (2162P)  
**Purpose:** Vote  
**Submitted by:** Laylah Sullivan  
**Related Material:** 2162P-section 504 procedure.docx

### BACKGROUND:

The PCM Board of Trustees previously approved the following WSSDA model Policies and Procedures. WSSDA has recommended updates to the policies and/or procedures.

### **WSSDA has updated the following model policies and/ procedures in 2023:**

- Harassment, Intimidation and Bullying of Students (3207/3207P) – The HIB model policy and procedure underwent significant changes as the result of HB 1207 – Preventing and Responding to Harassment, Intimidation, and Bullying in Schools. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Nondiscrimination and Affirmative Action (5010/5010P) – This model policy and procedure underwent significant changes also as a result of HB 1207. Revisions include changes to definitions as well as updates to the investigations and reporting processes.
- Highly Capable (2190/2190P)
- Student Records (3231) – This model policy was revised to align with SB 5127 – Student Personal Information – Public Records Act Exemption
- Excused and Unexcused Absences (3122/3122P) – This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. Revisions could be adopted through consent agenda.
- Discipline (3241/3241P) - This model policy and procedure was revised to align with HB 1207 but changes are non-substantive. It was also revised to clarify regulations of short-term suspensions.
- Restraint, Isolation, and Other Uses of Reasonable Force (3246/3246P) – This model policy and procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies.
- Section 504 (2162/2162P) – The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.
- \*\*Special Education and Related Services (2161P) – This model procedure was revised to align with SB 5315 – Special Education – Nonpublic Agencies (this still includes the modification suggested by the TMC that is specific to charters schools).
- Meeting Conduct, Order of Business and Quorum (1400/1400P) – This model policy and procedure was revised to comply with HB 1210 – Recording School Board Meetings.
- Regulations of Dangerous Weapons on School Premises (4210) – This model policy was updated to align with HB 1630 (2022).

**For Consideration:** This month Trustees will consider and vote on updates to Section 504 (2162P).

**Description of Changes:** The section 504 model policy was revised to align with HB 1207 but are non-substantive. Revisions could be adopted through the consent agenda.

List of updated policies and procedures:

<https://docs.google.com/spreadsheets/d/1Lwa8hyHu2FLwI0MYDA2uvRcNQwz4rwccD7PQRgTV15A/edit?usp=sharing>

RECOMMENDATION:

**Proposed Motion:** I motion to approve updated 2162P as presented.



**PROCEDURE for POLICY #2162**

**Education of Students with Disabilities Under Section 504 of the Rehabilitation Act of 1973**

**Adopted** – 11/2023

**Last Revised** – PCM: 11/2023, 6/2021, WSSDA: 7/2023

**Prior Revised Dates** – WSSDA: 6/1997, 6/2011, 4/2015, 11/2016

**A. Free Appropriate Public Education**

Pullman Community Montessori (PCM) will provide a free appropriate public education to school-age children with disabilities in PCM's jurisdiction.

**B. Child Find**

PCM will annually undertake to identify and locate every qualified disabled student residing in PCM's jurisdiction who is not receiving a public education and take appropriate steps to notify disabled children and their parents or guardians of PCM's responsibilities under Section 504.

**C. Equal Educational Opportunity**

PCM will provide students with disabilities an equal opportunity to participate in and benefit from the educational services it provides to non-disabled students. The teachers of disabled students will meet comparable standards for certification that teachers of non-disabled students meet. Facilities will be of comparable quality and appropriate materials and equipment will be available.

**D. Confidentiality of Information**

The confidentiality of student records will be maintained throughout the period of time when such records are collected, stored, disclosed or destroyed by PCM.

**E. Parent Involvement**

1. **Initial Evaluation.** PCM will obtain the consent of parents or guardians before conducting an initial evaluation of a student. PCM will notify parents or guardians of the evaluation results.
2. **Initial Placement.** PCM will notify parents or guardians before initially placing a disabled student.
3. **Significant Change in Placement.** PCM will notify parents or guardians before implementing a significant change in the student's placement.





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4. **Right to Challenge.** PCM will notify parents or guardians of their right to review and challenge PCM's program and placement decisions if they disagree with them.
  5. **Meetings.** Section 504 does not give parents or guardians the right to participate in a meeting during which their child's program is designed and placement is determined, as does the IDEA. However, this practice is recommended.

42 **F. Participation in the Least Restrictive Environment**

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1. **Academic setting.** To the maximum extent appropriate, PCM will educate disabled students with non-disabled students. In order to remove a child from the regular educational environment, PCM must demonstrate that education of the student in the regular environment with the use of supplementary aids and services cannot be achieved satisfactorily for the disabled student. Whenever PCM places a student in a setting other than the regular education environment, it will take into account the proximity of the alternate setting to the student's home.
  2. **Non-academic setting.** In providing or arranging for the provision of non-academic and extra-curricular services and activities, including meals, recess periods, and the services and activities, PCM will ensure that disabled students participate with non-disabled students in such activities and services to the maximum extent appropriate.

55 **G. Referral and Screening**

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1. **Referral.** If a student, parent or guardian, teacher, counselor or administrator believe they are observing in a student substantially limited performance in one or more major life activities that is believed to be caused by a physical or mental impairment, the concerned individual should complete a referral form which should be submitted to the 504 Coordinator ([EmilyK@myPCM.org](mailto:EmilyK@myPCM.org)).
  2. **Screening.** A designated building team will review referrals to determine if an evaluation is appropriate. If an evaluation appears to be necessary, PCM will obtain written consent from parents or guardians to perform an evaluation and/or gather additional information and will provide parents with a written statement of their rights under Section 504. If the 504 Team determines that an evaluation is not necessary, it will provide written notice to parents/guardians, and forward the results of the screening to the source of the referral.

68 **H. Evaluations**

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1. **Significant Change in Placement.** If a student is believed to be disabled and needs, or is believed to need, special education or related services, PCM will evaluate the student prior to placement and before any subsequent "significant change in that placement." An evaluation



72 need not include formal or written assessments but may involve, in appropriate  
 73 circumstances, a review and consideration of existing information.

74

75 Examples of significant changes in placement include:

- 76 a. Expulsion;
- 77 b. Suspensions which exceed ten consecutive days in a school year;
- 78 c. Cumulative short-term suspensions which create a pattern of exclusion;
- 79 d. Transferring a student to home instruction; and/or
- 80 e. Graduation from high school.

81

82 2. **Tests and Evaluation Materials.** PCM will establish procedures for evaluation and placement  
 83 which assure that tests and other evaluation materials:

- 84 a. Have been validated and are administered by trained personnel;
- 85 b. Are tailored to assess educational need and are not merely based on IQ scores; and
- 86 c. Reflect aptitude or achievement or whatever else the tests purport to measure and do not  
 87 reflect the student's impaired sensory, manual or speaking skills (unless the test is  
 88 designed to measure these particular deficits).

89

90 3. **Mitigating Measures.** The determination of whether a student is substantially limited in one  
 91 or more major life activities will be made without regard to any ameliorative effects of  
 92 mitigating measures which include, but are not limited to: medication, medical supplies,  
 93 equipment, low-vision devices, prosthetics, hearing aids and cochlear implants or other  
 94 implantable hearing devices, mobility devices, oxygen therapy equipment and supplies,  
 95 assistive technology, reasonable accommodations, auxiliary aids or services; or learned  
 96 behavioral or adaptive neurological modifications. However, ameliorative effects of mitigating  
 97 measures may be relevant as to whether a student needs any specific accommodation or a  
 98 504 accommodation plan.

99

100 **Low vision devices do not include ordinary eyeglasses or contact lenses.** The ameliorative  
 101 effects of ordinary eyeglasses or contact lenses may be considered in determining whether  
 102 the impairment substantially limits a major life activity.

103

104 4. **Temporary Impairments.** A student with a temporary impairment falls within the scope of  
 105 Section 504 if the temporary impairment is severe enough that it substantially limits one or  
 106 more of the student's major life activities. A temporary impairment is one with an actual or  
 107 expected duration of six months or less. For example, pregnancy is not generally regarded as



108 a disability under Section 504; however, if a student was put on bed rest or otherwise limited  
 109 due to pregnancy complications, this would be a temporary impairment that would qualify  
 110 the student as disabled under Section 504.

111  
 112 A student with an episodic impairment or a disease in remission qualifies as disabled under  
 113 Section 504 if the impairment would substantially limit a major life activity when active (e.g. a  
 114 student whose cancer is in remission).

115

116 **I. Placement Procedures**

117 The Section 504 team will convene to review all evaluation results, determine eligibility as a student with  
 118 a disability under Section 504 and document the meeting in writing. The team composition may vary  
 119 according to the needs of the student.

120

121 In interpreting evaluation data and in making placement decisions, PCM will

- 122 1) draw upon information from a variety of sources, including aptitude and achievement tests,  
 123 teacher recommendations, physical condition, social or cultural background and adaptive  
 124 behavior;
- 125 2) establish procedures to ensure that information obtained from all such sources is  
 126 documented and carefully considered;
- 127 3) ensure that the placement decision is made by a group of persons, including persons  
 128 knowledgeable about the student, the meaning of the evaluation data, and the placements  
 129 options; and
- 130 4) ensure that the student is educated with his/her non-disabled peers to the maximum extent  
 131 appropriate.

132

133 Parents and guardians of students who have a plan developed under Section 504 will be provided a  
 134 copy of PCM policy (see Policy 3246) on the use of isolation and restraint at the time that the plan is  
 135 created.

136

137 If PCM affords a free appropriate education to a student but the parent chooses to place the child  
 138 elsewhere, PCM is not responsible to pay for the out-of-district placement.

139

140 **J. Reevaluations**

141 PCM will provide for periodic reevaluation of disabled students. No time frame is specified in Section  
 142 504; however, re-evaluating students every three years in accordance with the requirements of the IDEA



143 will satisfy Section 504 requirements as well. A reevaluation is also required before any "significant  
 144 change of placement," as defined above in Part "H."

145

146 **K. Programming to Meet Individual Needs**

147 PCM recognizes that to be appropriate, educational programs for students with disabilities must be  
 148 designed to meet their individual needs to the same extent that the needs of non-disabled students are  
 149 met. A documented procedure, such as the development of an individualized accommodation plan by a  
 150 knowledgeable team of educational professionals, may be appropriate.

151

152 **L. Non-Academic Services**

153 PCM will provide nonacademic and extracurricular services and activities in such a manner as is  
 154 necessary to afford disabled students an equal opportunity for participation in such services and  
 155 activities. Nonacademic and extracurricular services and activities may include counseling services,  
 156 physical recreation athletics, transportation, health services, recreational activities, interest groups or  
 157 clubs sponsored by PCM, referrals to agencies which provide assistance to disabled persons and  
 158 employment of students, including both employment by PCM and assistance in making available  
 159 outside employment. PCM will observe reasonable health and safety standards for all students.

160

- 161 1. **Counseling Services.** In providing personal, academic or vocational counseling, guidance or  
 162 placement services to its students, PCM will provide these services without discrimination on  
 163 the basis of disability. PCM will ensure that qualified students with disabilities are not  
 164 counseled toward more restrictive career objectives than are non-disabled students with  
 165 similar interests and abilities.
- 166 2. **Physical Education and Athletics.** In providing physical education courses and athletics and  
 167 similar programs and activities to any of its students, PCM will not discriminate on the basis  
 168 of disability. If PCM offers physical education courses and operates or supports  
 169 interscholastic, club or intramural athletics, it will provide an equal opportunity for qualified  
 170 students with disabilities to participate in these activities consistent with their abilities and  
 171 needs.

171

172

173 **M. Preschool and Adult Education Programs**

174 In the operation of a preschool education, or daycare program or activity, or adult education program  
 175 or activity, the school will not, on the basis of disability, exclude qualified students with disabilities from  
 176 the program or activity and will take into account the needs of such persons in determining the aid,  
 177 benefits or services to be provided under the program or activity.

178



179 **N. Disciplinary Exclusion**

180 1. **Exclusions.** Students with disabilities are protected from being improperly excluded from school  
 181 for disciplinary reasons. Certain disciplinary exclusions of disabled students from school  
 182 constitute a significant change in the student's educational placement. A disciplinary change in  
 183 the student's educational placement occurs if the student has been suspended for more than  
 184 ten consecutive days or if the disciplinary exclusions constitute a "pattern of exclusion" (defined  
 185 below). Such disciplinary exclusions, which are change of placement, cannot be implemented  
 186 unless PCM first determines that the student's misconduct which led to the disciplinary exclusion  
 187 was not a manifestation of the student's disability.  
 188

189 **Manifestation Determinations.** If a disciplinary exclusion (suspension or expulsion) which  
 190 constitutes a change in placement is implemented, the school principal or educational staff  
 191 person responsible for the imposition of discipline must ensure that a group of qualified  
 192 professionals (the student's Section 504 team) determine whether or not the misconduct is a  
 193 manifestation of the student's disability.  
 194

195 The misconduct is considered a manifestation of the disability if the conduct was caused by, or  
 196 had a direct and substantial relationship to the student's disability. This manifestation  
 197 determination will take into account the student's current evaluation and individualized  
 198 accommodation plan under Section 504.  
 199

200 2. Under Section 504, there is no obligation to provide educational services during periods of  
 201 long-term suspension or expulsion when the student's misconduct has been properly  
 202 determined not to be disability-related. However, Washington state law requires PCM to provide  
 203 educational services to all students during a period of suspension or expulsion (See  
 204 Policy/Procedure 3241).  
 205

206 If a student's misconduct is determined to be a manifestation of his/her disability, procedures in  
 207 #3 below will be instituted in lieu of either long-term suspension or expulsion.  
 208

209 **Conduct That Is a Manifestation of a Disability.** When a student has engaged in misconduct  
 210 which is a manifestation of to his or her disability, expulsion and/or long-term suspension  
 211 should not be imposed if it would result in a change in educational placement (a disciplinary  
 212 exclusion from school of over ten consecutive days or exclusions which constitutes a pattern of  
 213 exclusion). Days will be measured cumulatively over the period of the entire school year, with  
 214 any short-term suspensions as counting toward the cumulative total.



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3. When a student's misconduct is related to a disability, additional evaluations and/or a change of placement should be considered. In this circumstance, the Section 504 team will meet to determine if there is a need for further evaluation or a change of program. If further evaluation is recommended, it will be conducted as soon as reasonably possible.

4. **Pattern of Exclusion.** Suspension or emergency expulsion of a disabled student may occur, without the need to determine if there is a causal connection with the disability, if the suspension or emergency expulsion is ten consecutive days or less, or if more than ten cumulative days is not a pattern of exclusion. A pattern of exclusion occurs if:
- The removal is for more than ten school days in a year; and
  - The student's behavior is substantially similar to the behavior that he/she was previously removed for.

Additional factors to consider are the length of each removal (the total amount of time the student has been removed, and the proximity of the removals to one another), and the school must determine on a case-by-case basis whether a pattern of removals is significant enough to constitute a change in placement.

5. **Right to Challenge.** Students and their parent/guardian will be notified of the results of the manifestation decision and of their right under the law to challenge this decision.

6. **Drugs or Alcohol.** Students who are considered disabled under Section 504 are subject to the same disciplinary processes and results as non-disabled students for misconduct regarding the use, sale or possession of drugs or alcohol at school.

**Restraint or Isolation.** Restraint or isolation of students who have a Section 504 plan will be authorized only under the limited circumstances specified in Policy/Procedure 3247 and each incident will require reporting and parent/guardian notification as specified in that policy and procedure.

### **Transportation**

If PCM places a student in a program not operated by PCM, PCM will assure that adequate transportation to and from the program is provided at no cost to the parent.

Because PCM provides transportation to all its students within a certain geographic area, it will not discriminate in its provision of transportation to students with disabilities.



251

252 If PCM proposes to terminate a qualified disabled student's bus transportation for inappropriate bus  
 253 behavior, PCM will first determine the relationship between the student's behavior and his or her  
 254 disabling condition. The parent or guardian will be provided with notice of the results of such  
 255 determinations and of their right to challenge such determinations.

256

### 257 **Procedural Requirements**

258 PCM will ensure compliance with the requirements of Section 504 by doing the following:

259

260

1. **Assurance.** Provide written assurance of non-discrimination whenever PCM receives federal  
 261 money;

262

2. **Designation of Employee.** Designate an employee to coordinate PCM's Section 504  
 263 compliance activities. The Section 504 Coordinator for PCM is Emily Klein  
 264 ([EmilyK@myPCM.org](mailto:EmilyK@myPCM.org));

265

3. **Grievance Procedures.** Provide grievance procedures to resolve complaints of  
 266 discrimination. Students, parents or employees are entitled to file grievances. The grievance  
 267 procedures for PCM are set out in the Procedure for Policy 3210, Nondiscrimination;

268

4. **Notice.** Provide notice to students, parents/guardians, employees, unions and professional  
 269 organizations of PCM's nondiscrimination policy in admission and access to programs and  
 270 activities, and in treatment and employment. Notice will also specify the Section 504  
 271 coordinator for PCM;

272

5. **Locate.** Annually undertake to identify and locate all Section 504 qualified disabled children  
 273 in PCM's jurisdiction who are not receiving a public education;

274

6. **Annual Notification.** Annually take appropriate steps to notify disabled persons and their  
 275 parents/guardians of PCM's responsibilities under Section 504; and

276

7. **Procedural Safeguards.** Establish and implement procedural safeguards to be provided to  
 277 parents/guardians with respect to actions regarding the identification, evaluation or  
 278 educational placement of persons who, because of disability, need, or are believed to need,  
 279 special instruction or related services. Procedural safeguards will include:

280

a. Notice of parental/guardian rights;

281

b. An opportunity for parents/guardians to examine relevant records;

282

c. An impartial hearing, initiated by either the parents/guardian or PCM, with  
 283 opportunity for participation by the student's parents/guardians and representation  
 284 by legal counsel; and

285

d. A review procedure.

286



287 **Appropriate Funding**

288 PCM recognizes that the regular education funding of PCM is the funding source for serving students  
 289 who are qualified as disabled under Section 504 only. However, if students are dual identified as Section  
 290 504 and IDEA eligible, state and federal special education funds can be used. PCM will not use money  
 291 appropriated by the IDEA to serve students found disabled under Section 504 but not the IDEA. PCM  
 292 may use the IDEA money to evaluate a student if PCM believes that the student may also be eligible  
 293 under the IDEA.

294

295 **Accessibility**

- 296 1. Facilities that were constructed prior to June 3, 1977 need not necessarily be made  
 297 accessible so long as the program or activity, viewed in its entirety, is readily accessible to  
 298 persons with disabilities.
- 299
- 300 2. Facility alterations commenced after June 3, 1977, that affect or could affect the facility's  
 301 usability must be accomplished so that, to the maximum extent feasible, the altered portion  
 302 of the facility is readily accessible and usable by persons with disabilities.
- 303
- 304 3. A district can redesign equipment, reassign classes or other services to accessible buildings,  
 305 assign aides to students, deliver services at alternate accessible sites or alter existing  
 306 facilities. So long as there are other methods which are as effective in achieving compliance,  
 307 a district need not undertake structural changes to a building.
- 308
- 309 4. District recognition of the meaning of the phrase "to the maximum extent feasible." This  
 310 provision covers the instance where occasionally the nature of an existing facility is such as  
 311 to make it impractical or prohibitively expensive to renovate in a manner that results in it  
 312 being entirely barrier-free. However, in all of these instances, the alteration should provide  
 313 the maximum amount of physical accessibility feasible.

314

315 **Special Considerations for ADD/ADHD Students**

316 Section 504 obligations apply to all students with disabilities, including students with attention deficit  
 317 disorder (ADD) or attention-deficit/hyperactivity disorder (ADHD). Under federal guidance, there are  
 318 three different types of ADHD, which are categorized depending upon which symptoms are the  
 319 strongest:

- 320 (1) predominately inattentive type;
- 321 (2) predominately hyperactive-impulsive type; and
- 322 (3) combined type (where symptoms of the first two types are equally present).





323

324 See U.S. Department of Education, Office for Civil Rights, Students with ADHD and Section 504: A  
325 Resource Guide (July 2016) (available on the Office for Civil Rights' website at  
326 <http://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/disability.html>).

327

328 **Due Process Hearing or Mediation Requests**

329 Due process hearing or mediation requests must be made directly to PCM 504 Compliance Officer.

330

331 **Legal References:** NA

332

333 **Cross References:** NA

# Coversheet

## Recurrent Enrollment (w/ historic data review)

**Section:** V. Other Business  
**Item:** K. Recurrent Enrollment (w/ historic data review)  
**Purpose:** Vote  
**Submitted by:**  
**Related Material:** PCM 2023-24 Recurrent Enrollment (Draft).docx  
Multi-YR Condensed Enrollment Summary.xlsx

 <p style="margin: 0;">WASHINGTON STATE <i>Charter School Commission</i> <small>STUDENTS • INNOVATION • TRANSPARENCY</small></p>	<p>P.O. Box 40996 Olympia WA 98504-0996 Phone: (360) 725-5511 Email: <a href="mailto:charterschoolinfo@k12.wa.us">charterschoolinfo@k12.wa.us</a></p>
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## RECURRENT ENROLLMENT

### CSC-SY-A24

(14.1 Performance Framework)

Overview: The Charter School Act (28A.710.170 (2)(e)) and the Organizational Performance Framework requires schools and authorizers to develop indicators, measures and metrics related to year-to-year recurrent enrollment. The Commission defines recurrent enrollment as the number of students continuing to be enrolled in the school from one year to the next expressed as a percentage of the total number of students eligible to continue their enrollment at the school. The Commission will send charter schools their recurrent enrollment numbers for the prior school year (based on October 10<sup>th</sup> enrollment) on or before November 15<sup>th</sup>. The charter school must then set a goal for recurrent enrollment for the current year that is ambitious yet realistic. A strong goal is not generally lower than actual recurrent enrollment for the previous year.

Current School Year	Prior Year Recurrent Enrollment from Commission	Target Recurrent Enrollment
PCM – 2023-24	79%	85%

Rationale for the charter school’s target recurrent enrollment rate: Our recurrent enrollment target is based on our growth in this metric since we opened during COVID along with the satisfaction of families who we have recruited. We would like the number to be higher but as our school is still in a rapid growth phase this introduces more change and families who want to try something new which means we have a constantly evolving population subset. Additionally, our program is still growing which means the launching of new initiatives and programs which does introduce a trouble-shooting phase. This may not be desirable to some families looking for a longer-established program, not one they have to growth with and navigate fine-tuning with. As our school stabilizes growth wise, we expect to maintain a 90% recurrent enrollment rate.

School Leader: \_\_\_\_\_  
Name
Signature

Date: \_\_\_\_\_

Or Board Chair: \_\_\_\_\_  
Name
Signature

Date: \_\_\_\_\_

Commission Representative: \_\_\_\_\_  
Name Signature

Date: \_\_\_\_\_

## Notice

The following file is attached to this PDF. You will need to open this packet in an application that supports attachments to pdf files, e.g. [Adobe Reader](#):

Multi-YR Condensed Enrollment Summary.xlsx