



Immediate Correction of Safety Deficiencies

March 7, 2024

Dear Washington State Charter Commission,

I am writing on behalf of the Pullman Community Montessori (PCM) Board of Directors to provide an update on our ongoing work to ensure student safety and well being and in accordance with state regulations and standards. We believe deeply that maintaining a safe learning environment is our top priority as a school and paramount for the well-being and education of our students.

Our team has been diligently working to address the areas of concern highlighted in the Immediate Correction on Safety Deficiencies by the Commission. In order for the school to address any concerns, stakeholders must follow the approved and publicly-shared [grievance processes](#). PCM understands its obligation as a public school to ensure the health, safety, and welfare of its students, and the Board believes it's critical to note that several of the concerns noted by the Commission did not come through the approved and appropriate notification channels so that the school and Board could deliver appropriate and timely resolution.

Some of the issues identified have already been addressed prior to the notice being rendered. We plan to review the safety procedures and address any lingering concerns at the 3/15 staff meeting. I am pleased to report that significant progress on the remaining areas of concern has been made, and we are confident in our ability to achieve full compliance. Please see the table below for a response, and some clarifications, to each of the areas highlighted by the Commission. Please let us know if any additional information is required by the Commission.

Thank you,

Laylah Sullivan, Head of School, sent on behalf of the Board of the Directors
Pullman Community Montessori



Overview of Immediate Next Steps

Safety Issue Identified by Commission	Immediate Next Steps to Address Issue and Initial Step Taken
<p>Student elopement on multiple different days.</p>	<p>How School Will Address Issue: The school will review and continue to enforce its Student Elopement Protocol. We follow the protocol from our de-escalation and R&I trainings with TMC. The protocol is listed below along with the number of incidents this year. The board will approve the elopement procedure as an official school procedure at the next board meeting.</p> <p>Incidence level this year (2023-24):</p> <ul style="list-style-type: none"> ○ There have been less than 20 incidents of elopement that occurred within the building, isolated to specific students. We know their habits and have built a plan with the student and family to mitigate the situation. Currently, the incidents are much lower than at the beginning of the year (now only 1 or 2 times in a month). Students' self-regulation and communication have increased dramatically in working with the common elopers. ○ We have 4 students who have elopement potential in their plan. We have 2 more who are undergoing evaluation that will have notations in their plan. 2 of the 4 students with plans have not eloped or have done so just once this year. As far as students leaving the building, there have been 3-4 incidents this year, all resolved safely. No incidents have occurred since late fall. ○ MIA (when eye contact is lost with students) - This has occurred less than 10 times this year with students that have moved quickly and students were located within 5 minutes. Students who have left never left the sidewalk around the property or went into the street, and law enforcement has not been needed to be contacted because students were located quickly and never left campus. <p>Response System/Protocol</p> <p>We call these students elopers. The staff members have participated in over 10 <u>direct and related trainings</u> (8/18-25, 11/1 Nautilus team only review, 11/29 intervention planning</p>



	<p>reflection, 12/6 quick notes review) since the beginning of the school year. This training is part of our de-escalation training provided by the True Measures Collaborative (TMC). We also had a Nautilus protocol refresher (who to call and when) and a review of the school's practices in relation to <u>restraint and isolation</u> (identifying who is appropriately trained). Staff members are made aware of who elopes, what the best response system is for de-escalation, and what level of safety concern there is when they elope.</p> <ul style="list-style-type: none"> ○ Call the Nautilus team and send an all-staff text (if high concern/missing) and pursue the student as supervision and safety allow. ○ Nautilus assumes tracking/pursuit at an appropriate distance for the state of the student and habit. ○ Triangulation protocol is initiated with Nautilus if a high-risk student (i.e. non-habitual, highly elevated) or student is missing. Gladish management is called so cameras can be utilized to find the student. ○ Floor-to-floor and room search is initiated if the student is missing. ○ Police and family will be contacted if the student is not located within 10 minutes (this has never happened). ○ If a student leaves campus, pursuit ends, and it is an immediate call to the police (this has never happened.) ○ Family is then contacted and the child moves through our Nautilus process. <p>Initial Step Taken: The school will hold a professional development session on 3/15 to review the Safety Plan and the elopement protocol with current staff.</p>
<p>Unsafe student behavior that interrupts the educational and working environment, is harmful to themselves and others, and creates a physically and emotionally unsafe environment, including student(s) throwing chairs, students' heads being pushed against the wall,</p>	<p>How School Will Address Issue: At PCM, our culture is rooted in the belief that discipline is positive and can be taught and is part of our everyday efforts essential to building leadership habits. These habits are critical in our pursuit of our mission. Every PCM teacher is trained in the Nautilus Approach which is a trauma-informed, attachment-based theory approach to discipline. The Nautilus Approach leverages restorative justice practices to help students develop their conflict resolution skills and repair hurt/damage when appropriate.</p>



<p>and/or kicking others on multiple different days.</p>	<p>The Nautilus approach is partnered with the Child Study process to address reoccurring or extreme events. Families are always contacted if the behavior of a student results in a Nautilus call (form in Transparent Classroom and call to family). If 3 events occur within a month, a child study team will be convened. Some children are on specific plans for physical behavior. These plans include removal of the child from the classroom if there is a significant act of physical aggression towards a student/staff or materials. To re-enter the classroom, the restore and repair process must be followed and the child has limited mobility in the classroom (freedom expanded with demonstration of responsibility and use of tools). If the act is minor, the child's ability to move around the classroom without permission will be limited. If they can adhere to this, the child may stay in the classroom. If another minor infraction occurs, they are removed from the classroom to work in the quiet space. They may re-enter the next day under the same limited-movement protocol after the restore and repair process has been completed. Parents are always communicated with, and in some instances, come in to provide their child additional support.</p> <p>Incident levels this school year (2023-24): This data is available through Skyward. There has never been an incident of a child throwing a chair, but children have tipped chairs over.</p> <p>Initial Step Taken: The school will hold a professional development session on (3/15) to review the Safety Plan with current staff. The Nautilus procedures and protocols, in addition to de-escalation practices, will be reviewed.</p> <p>The Nautilus team will review data the week of 3/11 to ensure students are making progress.</p>
<p>Severe student bullying including at least one account of a student telling another student to commit suicide multiple times, at least one account of a student threatening to kill another student's entire family, and at least two students being punched, in</p>	<p>How School Will Address Issue: PCM is quick to act when we receive a report from a student or parent or a Harassment, Intimidation, and Bullying (HIB) form. We've only received one HIB form to date. For significant events, PCM engages in the Threat Assessment Process (this document outlines the process more thoroughly) in accordance with our discipline matrix. The school will review and enforce its HIB policy and procedure and school bus behavior policy outlined in the Transportation Handbook. These are found in the</p>



school and/or on the school bus.

[Family Handbook](#) and shared with each enrolled family (copied below).

The Transportation Handbook is signed by each family who uses transportation. The Office Manager will ensure our bus drivers understand how to enforce the above policies and communicate issues to the school for resolution and communication to parents. Bus families were reminded to review the Transportation Handbook as we returned from winter break. Another Parent Square note will go home to families next week encouraging them to review the Transportation Handbook again and check in with their child.

Bus Policy

[Transportation Handbook 2023-24](#)

Transportation provided by PCM is a privilege and students will be suspended from school bus transportation due to inappropriate behavior. Students are expected to follow all safety rules while riding the bus. Therefore, we expect the children to:

1. Remain in their seats, feet and body facing forward
2. Talk in quiet and respectful voices
3. Obey the bus driver
4. Keep feet out of the aisles
5. Refrain from eating or drinking on the bus
6. Keep hands to themselves and inside the bus

If a student does not follow the rules, the student will be referred for restorative justice action by the bus driver. The following procedures assume a typical infraction from the list above.

Behavior that substantially endangers students or adults, will result in students receiving a heavier consequence earlier.

1st referral - Referral from bus driver and contact home

2nd referral - Family meeting to develop a behavior plan and contract

3rd referral - bus suspension (time to be determined)

If the unsafe behaviors continue, the student may lose bus privileges for the remainder of the year.

Initial Step Taken: The HOS will hold a professional development session on 3/15 to review the Safety Plan with current staff. The plan will include the HIB and bus policies.



	<p>The HOS, Office Manager, and Bus Driver will review the bus seating chart.</p> <p>The HOS and Office Manager will hold a Bus LEADERS community circle with students to review expectations and consequences for not following the community agreements (conducted the week of 3/11).</p> <p>A Parent Square announcement will be sent to families reminding families how to report concerns and incidents of Harassment, Intimidation, or Bullying.</p>
<p>Additional incidents of safety issues where students were either physically harmed or threatened with harm were also reported in the current/former staff and parent meetings and communications, along with concerns of a lack of responsiveness to the safety issues by the school.</p>	<p>How School Will Address Issue: PCM has not received additional incident reports from families, and to our understanding do not have any outstanding or unaddressed incident reports. We will encourage families to inform us if their concerns have not been adequately addressed. If the school can't resolve the issue to the family's satisfaction, we will refer the family to our Grievance and Conflict Resolution Process and encourage them to reach out to the PCM Board of Trustees.</p> <p>Initial Step Taken: The PCM office will send out a Parent Square announcement to families the week of 3/11 (along with the HIB reminder) encouraging families to reach out to the school.</p>
<p>Students and staff feeling fearful for their safety at school, that there is inadequate supervision_of students to keep them safe, and being afraid to go to school.</p>	<p>How School Will Address Issue: PCM adheres to a model that operates with two staff in the classroom and on the playground. Often a third adult (either sub, parent volunteer, or SPED IA) is also in the classrooms. PCM HOS will review supervision protocols and practices noted above during the staff PD on 3/15.</p> <p>Initial Step Taken: PCM Board reps will check in with staff members to assess if their needs have been met or are being addressed by the school admin.</p> <p>PCM board will contract with a third-party investigator to look into the harassment and retaliation claims that have been presented to the school. The results of this investigation will be shared with the Commission.</p>



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Safety Plan

PCM proposes the following [Safety Plan](#) to the Commission for approval. It will be initiated immediately after Commission approval. The Safety Plan includes all policies and procedures that are referenced in the “Overview” table below. The table includes additional details about the policies and procedures per the request of the Commission.

Overview

A plan to prevent student elopement and a description of how the School will inform the Commission of student elopement incidents.	The school will refresh all staff on the de-escalation protocol to minimize student elopement. For students who do elope the plan for these students will be followed as outlined above. Elopement events will be tracked and shared with the Board as outlined in the last section of this table. The school will add a data tracker of “safety incidents” that will include incidents of elopement and grievances filed related to HIB to be shared with the Board and the Commission.
A plan to ensure and enhance student safety at the school and on the school bus.	This plan is outlined in the table above. Please see the school bus behavior policy outlined in the Transportation Handbook and in the Family Handbook . Both of these documents are in our Safety Plan.
A plan to provide staff professional development and direct support for challenging student behaviors.	In addition to the Safety Plan review PD scheduled for 3/15, the TMC continues to provide coaching to each classroom team and the Director of Specialized Programs. They will engage in one more site visit before the end of the year (this has not been scheduled yet). They just provided coaching and feedback about support for challenging student behaviors at their site visit on 2/4. The classroom teams will continue their weekly collab sessions with the SPED team to field any questions or concerns. The Safety Plan itself will be the guiding document for the 3/15 staff PD on addressing challenging student behaviors.
A plan to obtain an independent evaluation of multi-tiered system of support practices, policies, and procedures that includes: a	The school will request that the True Measure Collaborative, a technical assistance provider, conduct an independent review of our MTSS practices, policies, and procedures. We have requested that this review and the subsequent recommendations be completed by the end of March and are



<p>focus on behaviors at the school; a discipline review; universal supports; and Tiers 1, 2, and 3 supports. The evaluation should include recommendations and an implementation plan.</p>	<p>awaiting confirmation. The review will consist of a document review and an on-site visit and observations. The school will then develop an implementation plan, incorporating the recommendations by 3/31/24. We anticipate since TMC supported through our WSIM process that adjustments will be minor.</p>
<p>A plan for how the school will respond to harassment, intimidation and bullying without fear of retaliation.</p>	<p>PCM is quick to act when we receive a report from a student or parent or a Harassment, Intimidation, and Bullying (HIB) form. We've only received one HIB form to date. For significant events, PCM engages in the Threat Assessment Process (this document outlines the process more thoroughly) in accordance with our discipline matrix. The school will review and enforce its HIB policy and procedure. The PCM office will send out a Parent Square announcement to families the week of 3/11 (along with the HIB reminder) encouraging families to reach out to the school.</p> <p>PCM board will contract with a third-party investigator to look into the harassment and retaliation claims that have been presented to the school. The results of this investigation will be shared with the Commission.</p>
<p>A plan for the Board to ensure compliance with the safety plan.</p>	<p>The board will review the Safety Plan and approve it at the next board meeting. The school will add a data tracker of "safety incidents" to its monthly dashboard. This will include incidents of elopement and grievances filed related to HIB. The board chair will continue to meet with the HOS weekly to monitor any safety concerns. The board agreed at the last board meeting (3/4) that the meeting notes will be shared with the entire board for transparency and accountability.</p>