

February 29, 2024

Board of Directors  
Pullman Community Montessori  
115 NW State Street  
Pullman, WA 99163

**Re: (1) Immediate Correction of Safety Deficiencies Required and (2) Notice of Perceived Problems–  
Please Confirm Receipt and Note Deadlines Below**

Dear Board Members:

- (1)** I am writing to provide you notice that the Washington State Charter School Commission (Commission) has reason to believe that there is immediate threat to student or employee health, safety or welfare at Pullman Community Montessori (PCM). Thus, pursuant to Washington Administrative Code (WAC) 108-40-040 (2), the Commission is requiring immediate correction of the deficiencies as set forth below. Additionally, changes in the Charter School Act in 2023 allow the Commission to conduct or require oversight activities for “a pattern of well-founded complaints about a charter school” “or other objective circumstances” that warrant Commission oversight.
- (2)** *(2) In addition to the Immediate Correction Required under WAC 108-40-040(2),* the Commission is providing a Notice of Perceived Problems (NPP). The Commission has reason to believe that PCM has not met legal and contractual obligations, including, but not limited to Contract provisions §§ 4.1, 5.1, 5.2, 5.4, 5.11, 5.21, 5.25, 8.1, 8.2, 16.2 and Applicable Law.

### **Background:**

The January 20, 2024 NPP provides additional background. Since the January 20, 2024 NPP sent to the PCM Board, Commission staff have completed additional observations at PCM, attended a Board meeting<sup>1</sup>, met with current and former parents and teachers, and received numerous additional complaints:

- The Commission has received a pattern of complaints from current and/or former staff and parents of the school reporting:
  - Student elopement on multiple different days.
  - 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, and/or kicking others on multiple different days.

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<sup>1</sup> A Board member resigned after this meeting based in part on concerns with the Head of School and Board governance.

- Severe student bullying including at least one account of a student telling another student 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 school and/or on the school bus.
- 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.
- 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.
- Threats of retaliation from the Head of School (i.e., job loss). In the Commission's meetings and correspondence with both current and former teachers, the threat of retaliation by the Head of School in the form of the Head of School indicating one's job being at risk if negative information was made public by employees, was described multiple times. In the Commission's meetings and correspondence with parents, the experience of and fear of retaliation by the Head of School in the form of targeting one's student for reporting safety issues was described. This is concerning because Section 5.25 of the charter contract prohibits against any direct or indirect intimidation, interference, or coercion of the employee in disclosing alleged improper action by the School, and hinders safety improvements.

In addition, during a site visit to the school on February 26, 2024, the Commission learned, that despite expressly advising the Head of School that the Commission would need to review and approve a change requested to the educational program terms and conditions before the School could proceed with the proposed change, the Head of School initiated the change without Commission approval. The change involved combining classrooms so that students spanning grades 3 through 7 were taught one classroom, with one teacher and one classroom assistant in the classroom. This is a failure to implement, deliver, support and maintain the Commission-approved Educational Program Term #1 : Developmentally appropriate age-grouped classrooms, including three-year blocking of ages by developmental appropriateness (ages 6-9 (lower elementary), 9-12 (upper elementary), and 12-15 (adolescent community)). The change groups the upper elementary and adolescent community together in one classroom. This unilateral change, particularly after the Head of School was advised that the Commission needed to approve the change, is a material violation of the Contract.

**(1) Immediate Correction of Safety Deficiencies Required.**

PCM is required to correct the following safety deficiencies immediately.

**Commission Findings Requiring Immediate Correction for Safety:**

- The Commission has received a pattern of complaints from current and/or former staff and parents of the school reporting:
  - Student elopement on multiple different days.
  - 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, and/or kicking others on multiple different days.

- Severe student bullying including at least one account of a student telling another student 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 school and/or on the school bus.
- 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.
- 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.

**PCM is required to take immediate steps to address safety issues identified in the findings above and to explain to the Commission the initial steps taken.**

**In addition, PCM must propose to the Commission, in writing, a safety plan within 5 working days, with a deadline of March 7, 2024. The safety plan should be initiated immediately after approval by the Commission.** The safety plan should include the following elements:

- A plan to prevent student elopement and a description of how the School will inform the Commission of student elopement incidents.
- A plan to ensure and enhance student safety at the school and on the school bus.
- A plan to provide staff professional development and direct support for challenging student behaviors.
- A plan to obtain an independent evaluation of multi-tiered system of support practices, policies, and procedures that includes: a 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.
- A plan for how the school will respond to harassment, intimidation and bullying without fear of retaliation.
- A plan for the Board to ensure compliance with the safety plan.

**(2) Notice of Perceived Problem:**

**PCM has 7 working days to respond to the NPP, with a deadline of March 11, 2024.** Per WAC 108-40-030 (6), fewer than 10 working days is being provided due to continuing issues despite extensive communication with the School, and even after the original Notice of Perceived Problem was issued on February 20, 2024.

**Summary of Perceived Problems**

- Threats of retaliation from the Head of School (i.e., job loss). In the Commission’s meetings and correspondence with both current and former teachers, the threat of retaliation by the Head of School in the form of the Head of School indicating one’s job being at risk if negative information was made public by employees, was described multiple times. In the Commission’s meetings and correspondence with parents, the experience of and fear of retaliation by the Head of School in the form of targeting one’s student for reporting safety issues was described. This is concerning because Section

5.25 of the charter contract prohibits against any direct or indirect intimidation, interference, or coercion of the employee in disclosing alleged improper action by the School, and hinders safety improvements.

- Unilateral change to Educational Program Term #1: Developmentally appropriate age-grouped classrooms, including three-year blocking of ages by developmental appropriateness.
- Board has failed to: ensure legal and contractual compliance; and hold the Head of School accountable to resolve concerns raised by members of the school community.

Please contact me directly if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jessica de Barros', with a stylized flourish at the end.

Jessica de Barros  
Executive Director