



DR. CHARLENE M. DUKES
PRESIDENT

301 LARGO ROAD
LARGO, MD 20774-2199
301-322-0400
FAX: 301-350-1239
www.pgcc.edu

May 27, 2016

Dr. Kevin Maxwell
Chief Executive Officer
Prince George's County Public Schools
14201 School Lane
Upper Marlboro, Maryland 20772

Dear Dr. Maxwell:

On behalf of the members of the Student Safety Task Force, thank you and the Prince George's County Public Schools System families and employees for permitting each of us to serve in a capacity to review current policies, procedures, and practices with the goal of enhancing student safety and preventing child sexual abuse. The culmination of the work of the Task Force has resulted in proposing five major recommendations, advising that 61 considerations relative to four key areas receive serious deliberation by system officials, and suggesting 28 opportunities to update, clarify, and/or enhance administrative procedures.

The Student Safety Task Force believes this report is focused, inclusive, and intentional in its attempt to categorize the myriad of ways and opportunities that exist to support student safety and the prevention of child sexual abuse in our schools. Implementing the recommendations, considerations, and suggestions has the potential to assist the Prince George's County School System and its leadership at the system and local levels in creating and sustaining exemplary practices while making significant progress in areas that require change.

We believe this work is not finished. It must be ongoing and intentional with regularly scheduled reviews of policies, procedures, and practices. There should be consideration to inviting consultants and subject-matter experts to engage periodically with System and school leadership to understand emerging best practices and implementation of these practices in the school environment. Whether in schools, within families, or in communities, all adults share responsibility for student safety. Prince George's County Public Schools has the opportunity to become a national leader by taking bold and concrete action, the goal of which is to enhance student safety and prevent child sexual abuse.

The Task Force took immediate action by creating work groups that focused on four key areas. Each of the groups reviewed documents, identified best practices, listened to subject-matter experts, surveyed the community, and engaged with school personnel, all of which was significant to the work.

The key areas were:

- Culture and Climate
- Reporting and Training
- Screening of Employees, Volunteers, Visitors, Vendors, and Contractors
- Curriculum and Counseling

Additionally, the Task Force examined and made 28 suggestions to update, clarify, or enhance six administrative procedures that directly or indirectly connect to the prevention of child sexual abuse. Those procedures are as follows:

- AP 4216.6 – Volunteers
- AP 5145 – Reporting Suspected Child Abuse and Neglect
- AP 4215 – Criminal History Checks
- AP 0500 – School Visitors
- AP 5180 – Use of Social Media in Schools
- AP 4126 – Employee Use of Social Media

The Task Force had access to school based and non-school based personnel and subject-matter experts who are deeply committed to sustaining safe environments in schools and developing strong policies supported by enhanced administrative procedures to prevent child sexual abuse.

We wish to thank the greater Prince George's County community for understanding the gravity of this assignment and allowing the Task Force to take the time necessary to complete the work, which took us beyond the original published deadline of May 2, 2016. However, the additional three weeks permitted the opportunity to pay close attention to community comments, interview key internal and external constituents who work with children in various capacities on a daily basis, and continuously review the literature and listen to subject-matter experts.

We are grateful to the Union leadership for their commitment to student safety and for supporting the Task Force's desire to meet with school employees whose allegiance to students and the maintenance of safe environments are visibly apparent and steadfast. This access allowed the Task Force to listen to the voices of those charged to educate, transport, and support **our** children in a multiplicity of ways in Prince George's County.

We want to thank the Resource Team comprised of PGCPs administrators and personnel, led by Mr. George Margolies, Chief of Staff. The Team answered every question; provided information, documents, and materials; and was candid in articulating their ongoing intent to ensure that students arrived at schools exhibiting cultures and climates that supported children and their families.

Dr. Kevin Maxwell
Page 3
May 27, 2016

We especially appreciate the service provided by the support teams in offices of the Chief of Staff, Technology Training, Testing and Assessment, and Communications. The assistance provided by these offices was outstanding and is much appreciated.

Yours in Service,

A handwritten signature in cursive script that reads "Charlene M. Dukes".

Charlene M. Dukes
Chair
Student Safety Task Force

cc: Blanca Abrico, Parent
Renee Battle Brooks, Esquire
Judy Bresler, Esquire
Gloria Brown, M.S.
Michele Booth Cole, Esquire
Brenda Jones Harden, M.D.
Kristina Kyles-Smith, C.A.G.S.
Joshua Sharfstein, M.D.

**PRINCE GEORGE’S COUNTY PUBLIC SCHOOLS
STUDENT SAFETY TASK FORCE**

Report and Recommendations

Submitted to

Dr. Kevin Maxwell, Chief Executive Officer

Prince George’s County Public Schools

May 27, 2016

Dr. Kevin M. Maxwell, Chief Executive Officer of the Prince George’s County Public Schools, announced the formation of the Student Safety Task Force on February 22, 2016 in response to safety concerns pertaining to the criminal investigation of alleged child sexual abuse at Judge Sylvania Woods Elementary School. The Student Safety Task Force (Task Force) was charged with conducting a thorough review of the school system’s current policies, procedures, processes, and practices and making recommendations to enhance school safety. The independent Task Force is comprised of representatives from non-profit, private sector, public safety organizations, colleges and universities, and local government:

- Charlene M. Dukes, Ed.D., President, Prince George’s Community College & Chair of the Prince George’s County Public Schools Student Safety Task Force
- Joshua Sharfstein, M.D., Associate Dean for Public Health Practice and Training and faculty in Health Policy and Management at the John Hopkins Bloomberg School of Public Health
- Gloria Brown, M.S., Director, Prince George’s County Department of Social Services
- Renee Battle Brooks, Esq., Office of the State’s Attorney, Prince George’s County
- Judy Bresler, Esq., Attorney at Law, Carney, Kelehan, Bresler, Bennett & Scherr, LLP
- Kristina Kyles-Smith, C.A.G.S., Assistant State Superintendent, Division of Student, Family and School Support, Maryland State Department of Education
- Brenda Jones Harden, M.D., Associate Professor, Department of Human Development and Quantitative Methodology, University of Maryland of College Park
- Michele Booth Cole, J.D., Executive Director, Safe Shores – The DC Children's Advocacy Center
- Blanca Abrico, Parent of a student at Robert R. Gray Elementary School

The Task Force was originally asked to complete its work by adhering to the following four phases and timelines:

Phase 1 (March 1 – March 11): Background and Policy Review

1. Hear from experts on key strategies for protecting children.
2. Review policy on background checks, individual screenings, and required clearances for all employees and vendors/contractors.
3. Review policy on curriculum and age-appropriate student programming.
4. Review policy on reporting of child abuse and neglect.
5. Review the current policy that supports volunteers in schools or school-related activities to include screenings, clearances, training, and supervision by authorized school system personnel.

Phase 2 (March 14 – March 25): Process and Practice Reviews 1 of 2

1. Review the process and practice for background checks, screenings, and required clearances.
2. Review the current state of curriculum and age-appropriate student programming, at each school level, regarding sexual harassment behaviors, awareness, and identification to include sexual abuse and assault and the safe use of social media and other technologies.

Phase 3 (March 28 – April 8): Process and Practice Reviews 2 of 2

1. Review the initial on-boarding process for new employees and ongoing training requirements for all employees to ensure accurate and direct understanding of the responsibility and timelines to report suspected child abuse, neglect, and suspicious behavior to the appropriate authorities.
2. Review existing process and practice related to the reporting of child abuse and neglect, background checks (criminal and otherwise).

Phase 4 (April 11 – 29)

1. Make recommendations to strengthen, enhance, and amend current policies, procedures, processes, and practices.
2. Review and submit final recommendations to Dr. Maxwell for consideration on or before May 2, 2016.

Resource Personnel

The following Prince George's County Public Schools (PGCPS) and community representatives served as resource personnel and assisted, where appropriate, the Task Force in gathering information about current policies, procedures, and practices related to the charge:

- George Margolies, J.D., Chief of Staff and PGCPS Lead for the Student Safety Task Force
- Monique W. Davis, Ed.D., Deputy Superintendent of Schools, PGCPS

- Shawn Joseph, Ed.D., Deputy Superintendent of Teaching and Learning, PGCPS
- Adrian Talley, Ed.D., Executive Director, Office of Student Services, PGCPS
- Erica Berry, Esq., Executive Director, Office of the Board of Education
- Tehani Collazo, Ed.D., Education Policy Advisor, Prince George's County

Introduction and Methodology

At all times, the Task Force was clear that it had a single emphasis, and that was to respond to the charge as provided by the Chief Executive Officer of the Prince George's County Public Schools (PGCPS) and develop recommendations for the system and local schools to promote safety of children in schools. The Task Force was not charged with investigating or responding to specific instances of abuse or neglect, and the Task Force did not do so.

The Task Force began its work in early March 2016 by requesting essential materials, documents, and information that focused on safeguarding students. The documents included policies and procedures, curriculum materials, and information pertaining to employee and volunteer screening, training, and reporting of suspected child abuse. While undertaking a thorough examination, the Task Force began to craft a set of questions related to PGCPS policies, procedures, and materials designed to create safe learning environments (see Resources Section). These questions provided the framework for the Task Force to complete its assignment.

During the process, it became apparent that the work required much more intensive analysis in four critical areas: Climate and Culture, Reporting and Training; Screening of Employees, Volunteers, Vendors, and Contractors; and Curriculum and Counseling. It also was obvious that the original timeline for assessing the current state, reviewing findings, and developing recommendations was unrealistic; therefore, the Task Force, through the Chair, communicated to the CEO the need to extend the deadline and committed to the provision of a report, to include recommendations for proposed action, no later than the end of May 2016.

Understanding that its ultimate responsibility was to make recommendations that substantiate and enhance the use of best practices to proactively address safety of school children, the Task Force had access to the resources necessary to make critical and viable recommendations. It also had the authority to meet with non-school based and school-based professionals and survey the larger community to further understand the nexus between implementation and practice.

The Task Force engaged in the following activities to meet its assigned charge:

- Met with System leadership to review the charge at its first meeting on March 3, 2016.
- Requested, received, and reviewed internal school policies and administrative procedures.
- Engaged external subject-matter experts to inform its work.

- Determined the critical focus areas based on reports, policies, procedures, and external resource information.
- Conducted a review of the literature on child sexual abuse.
- Organized into four groups around the identified critical areas of Culture and Climate; Reporting and Training; Screening of Employees, Volunteers, Visitors, Vendors, and Contractors; and Curriculum and Counseling.
- Recognized the importance of the voices of school personnel, service providers, and the larger community
- Met with union representatives and administrators to identify a list of employees, vendors, contractors, and volunteers in order to interview a broad, cross-sectional list of individuals.
- Developed a script which served as the basis for conducting the individual interviews.
- Designed and administered a survey to engage the broader community in April.
- Observed two sessions of volunteer training in April.
- Met a minimum of 30 times as an independent Task Force: collectively, in teams for the critical areas, via conference calls, in the individual interviews, and writing the report with more than 500 hours dedicated to completing the charge.

Additional hours were spent on examining internal and external documents, inclusive of the 405 responses to the Task Force survey. Members also reviewed the work of subject-matter experts. The Task Force concluded its work on May 27, 2016 and provided the report to the CEO of the Prince George's County Public Schools.

Task Force members also watched training videos currently provided to school personnel and volunteers, specifically, "*Reporting Child Abuse and Neglect.*" Health curriculum guides were provided so that Task Force members could understand the content of lessons taught at various grade levels. In addition to questions posed to system administrators, Task Force members conducted interviews with school employees, vendors, contractors, and volunteers, each of whom was assured that his/her identities would remain confidential to encourage candid dialogue regarding issues of safety for children.

Employees who were scheduled to be interviewed included teachers, principals (elementary, middle, and high school), counselors, school psychologists, pupil personnel workers, bus drivers, bus attendants, security, human resource administrators, food service assistants and managers, and custodians. The intent of the interviews was to understand how current policies and practices were being implemented, determine what was working well, identify gaps, and assess opportunities for improvement.

The Task Force continues to interview school-based personnel. If there are substantive comments that will add to this body of work, an addendum will be provided to the CEO by July 1, 2016. If the interviews do not add substance to what has been reported and recommended, the report will stand as written and submitted on May 27, 2016.

External Resources

The Task Force held discussions with subject-matter experts representing the Family Tree and the Moore Center for the Prevention of Child Sexual Abuse at Johns Hopkins University, both located in Baltimore, Maryland. The Family Tree, a nonprofit organization, provides information and training related to the prevention of child sexual abuse by connecting caring communities and building strong families. In their meeting with the Task Force, the Family Tree articulated the need for community awareness; the ways in which schools and youth-serving organizations support safe, healthy, and respectful environments; and how parents can become comfortable talking to their children about all aspects of sexuality.

Family Tree representatives provided information on common strategies to prevent child sexual abuse inclusive of identification, treatment, monitoring, and risk reduction. They also discussed the conditions that support abuse, including social messages, secrecy, and silence; and child safety programs that provide appropriate messages to children about their rights, different types of touching, and setting limits.

The Moore Center for the Prevention of Child Sexual Abuse promotes a public health approach to child sexual abuse prevention that includes research, policy analysis, and education. Its goal is to develop a more comprehensive and collaborative approach that focuses on the prevention of child sexual abuse. The latest news releases for the Center indicated that the “overarching goal is to move our nation’s response to child sexual abuse from a criminal justice orientation, focused on after-the-fact responses, to a more comprehensive approach that focuses significant resources on prevention of child sexual abuse.” The Center wants “to bring public health expertise and perspectives to the complex policy issues related to the prevention of child sexual abuse.”

Dr. Elizabeth Letourneau, founding director of the Moore Center and associate professor in the Bloomberg School’s Department of Mental Health, reviewed the curriculum and recommended best practices that support the prevention of child sexual abuse.

Community Survey

With a commitment to engage the broader community, the Task Force developed and administered a survey to gain insights from parents, current and former students, current and former employees, and a broad array of community stakeholders to gauge the community’s perceptions of strengths and weaknesses of current policies, procedures, and practices. Respondents also had the opportunity to suggest recommendations. The online survey was available from April 5 – 15, 2016, and respondents were asked to give their opinions/perspectives in the four critical areas and respond to three general questions:

- Culture and Climate
- Reporting and Training
- Screening of System Employees, Volunteers, Vendors, and Contractors
- Curriculum and Counseling

- What are the strengths of current policies, procedures, and practices?
- What are the weaknesses of current policies, procedures, and practices?
- What recommendations would be helpful to enhance school safety?

In order to publicize the survey, press releases were sent to 81 regional print and visual media; robo-calls were made to 127,000 homes of children enrolled in the public schools with English and Spanish translations; information was sent via social media and the communication vehicles of key community stakeholder organizations. The survey link was prominently displayed on the PGCPs website on the rotator site in addition to visible location on the homepage and the Student Safety Task Force page. It was immediately accessible in English and Spanish languages for those who wished to participate.

Four hundred and five individuals responded to the survey, and the distribution is as follows:

STUDENT SAFETY SURVEY

Distribution of Respondents by Principal Affiliation

Affiliation	English Language Survey		Spanish Language Survey		All Respondents	
	# of Respondents	Percent	# of Respondents	Percent	# of Respondents	Percent
Parent/Guardian	161	41.5%	14	82.4%	175	43.2%
Community Member	23	5.9%	2	11.8%	25	6.2%
Current Employee	146	37.6%	0	0.0%	146	36.0%
Current Student	19	4.9%	0	0.0%	19	4.7%
Former Employee	12	3.1%	0	0.0%	12	3.0%
Former Student	5	1.3%	0	0.0%	5	1.2%
News/Media	1	0.3%	0	0.0%	1	0.2%
Other	6	1.5%	0	0.0%	6	1.5%
Non-Response/ Missing	15	3.9%	1	5.9%	16	4.0%
Total	388	100.0%	17	100.0%	405	100.0%

An analysis of the responses revealed both strengths and opportunities to improve policies, procedures, and practices. The Task Force considered all of the comments of the survey respondents and interviewees in the development of key recommendations.

Major Findings and Recommendations

Student safety is the responsibility of all adults, and the primary obligation to protect children from sexual abuse lies with adults. With this guiding principle in mind, the Task Force identified recommendations that support system and school leaders and employees in responsibly implementing policies and best practices to improve safety.

The Task Force offers the following five major recommendations as a starting point. Additionally, there are 60 specific considerations articulated as a result of focusing on four key areas of review, and 28 suggestions to update, clarify, or enhance six administrative procedures, all of which are described in detail in this report.

Recommendation 1: The CEO of the Prince George’s County Public Schools should report publically each year on system-wide efforts related to student safety.

The CEO’s report should include data, strategies, and outcomes on critical action steps taken to address the major recommendations, considerations, and suggestions as outlined in this report.

Recommendation 2: The CEO should ensure that each Principal conducts safety assessments and uses the results to develop and implement comprehensive strategies to include screening and training of employees, volunteers, vendors, and contactors; evaluation of physical facilities; and curriculum/lesson content reviews. The CEO should consider opportunities to set evaluative measures for Principals based on their ability to develop and implement these strategies. PGCPS must engage and share with parents, guardians, and community members the expectations regarding child safety and the processes undertaken to support safe environments for children.

System leaders and Principals bear the primary responsibility for creating a culture and climate of school safety. Opportunities exist to develop comprehensive safety assessments designed to prevent child sexual abuse. The results of the assessments should be analyzed for implementation with actions deployed across all schools at all levels.

Recommendation 3: The CEO should establish an Office of Monitoring, Accountability, and Compliance with direct reporting to the CEO. The office will assume responsibility for assuring implementation of procedures associated with policies approved by the Board of Education. It must assure fidelity in training, awareness of individual responsibility to report to whom by when, and compliance with System procedures and expectations to support increased employee and volunteer accountability for the prevention of child sexual abuse.

PGCPS is responsible for directing that employees, volunteers, visitors, vendors, and contractors are adequately trained; can recognize warning signs of inappropriate relationships; and are aware of their responsibility to report abuse. Gaps in the system can be eradicated by using a more contemporary holistic approach to the content of

training materials and oversight of the training process to ensure consistent alignment between and among policy, procedure, and practice.

Recommendation 4: The School System should develop and implement a “universal precautions” approach to screening and training of employees, volunteers, vendors, and contractors. This approach should include a searchable database for rapid identification of red flags that can be handled in accordance with System policies. It also should allow for easy verification that employees, volunteers, vendors, and contractors have been screened and trained on detecting and preventing child sexual abuse. Subject-matter experts must be engaged to support the work of the system.

PGCPS is responsible for enforcing standards for screening employees and others to identify those who pose potential risks to child safety. Current practices must be reviewed to eliminate inconsistencies, misalignments, and unrealistic distinctions among different categories of individuals with regard to the screening process.

Recommendation 5: The School System should update the curricular content focused on preventing child sexual abuse that is taught in K – 12. It must be developmentally-age-appropriate, engage parents and/or guardians, and meet evidence-based criteria for effectiveness in mitigating instances of child sexual abuse. A new Office of Monitoring, Accountability, and Compliance can assure policies and procedures are followed in accordance with system expectations, well-trained teachers and counselors provide the instruction, and curricula are intentionally delivered across the school system.

The primary responsibility for child sexual abuse prevention does not reside with students; however, evidence indicates that an effective curriculum can educate students and parents, increase disclosure, and reduce self-blame. Updates to the current curriculum will increase its effectiveness in addressing child sexual abuse in schools.

Four Key Areas of Review

The Task Force was purposeful in focusing its attention on the following key areas that have the greatest potential to prevent child sexual abuse in schools: Culture and Climate; Reporting and Training; Screening of Employees, Volunteers, Vendors, and Contractors; and Curriculum and Counseling. The Task Force’s responses are based on available information and research to date. Anything in this report noted as “uncertain” or “unknown” is not to be interpreted as a finding; rather, such comments merely reflect the need for PGCPS to conduct additional follow-up.

Each section begins by stating the key questions; setting the background and context for the work; discussing findings; and making more detailed considerations or suggestions to enhance student safety and support the teaching and learning environments the Task Force believes must be characteristic of all schools across the system.

The many individual considerations outlined under each key area and those suggestions that are specific to current administrative procedures have the potential to assist the Prince George's County School System in sustaining exemplary practices and making significant progress in areas that require change. Whether in schools, within families, or in communities, all adults share responsibility for student safety. Prince George's County Public Schools has the opportunity to become a national leader, by taking bold and concrete action, the ultimate goal of those actions is to enhance student safety and prevent child sexual abuse.

CULTURE AND CLIMATE

KEY QUESTIONS

How do system and school leaderships assess the overall safety of schools?

Are the buildings assessed for safety and, if so, how are those results communicated and issues addressed?

How do the principal and the supervisor know if there are patterns of supportive and caring adult relationships for students?

Are there school quality standards that outline expectations for a positive school climate?

Is there a mechanism to report anonymously bullying and harassment? If so, how many such reports are received, and how does the school system follow-up?

BACKGROUND AND CONTEXT

The mission of the Prince George's Public School System is "to provide a great education that empowers all students and contributes to thriving communities" (Prince George's County Public School System, 2016). School systems striving to create an empowering educational community must develop a school climate that values student safety which, in turn, helps to create an environment where students are less vulnerable to predators.

According to the National School Climate Center (2016), "School climate refers to the quality and character of school life as it relates to norms and values, interpersonal relations and social interactions, and organizational processes and structures. Often, indicators of school climate include measures such as safety, rules and norms, physical security, social-emotional safety, social support from adults, social support from other students, school connectedness, clean and orderly physical surroundings, and effective leadership. When a school has an effective school climate, there is a decreased likelihood that a student will fall victim to sexual abuse."

An effective school climate:

1. Values students and schools.
2. Creates a shared responsibility among faculty and staff for student safety.
3. Creates an atmosphere where adults feel safe to report when someone does not follow local school and system procedures regarding interaction with students or when there is suspicion of child sexual abuse and neglect.
4. Establishes, communicates, and holds the entire school community responsible for guidelines to maintain professional interactions between adults and students.
5. Regularly monitors the climate of the school and the behaviors of those in the school environment.

Authors Saul and Audage (2007) cite several barriers to implementing effective school climate and culture practices that prevent child sexual abuse. First, adult beliefs can impede the ability for an adult to recognize the signs that child sexual abuse is occurring. Adults may believe that their organizations are not susceptible to child sexual abuse or that no one in their building is capable of committing child sexual abuse. Students most at risk of child sexual abuse are those who are the most vulnerable. Often, these students are difficult to engage in the classroom or “act out” during school. Therefore, it is a welcome distraction when someone is committed to spending time with this student despite the warning signs that this adult is a child sexual predator.

Secondly, Saul and Audage (2007) acknowledge that poor relationships and structural and administrative oversight of sexual abuse policies and procedures can be a potential barrier to implementing effective child sexual abuse prevention strategies. There is often a fear of retaliation that comes with reporting incidents. This fear may be caused by a lack of commitment to the child sexual abuse prevention policies and procedures or a perceived lack of support from leadership. Lack of clear communication, follow-up, and monitoring are examples of administrative barriers to child sexual abuse prevention. A lack of resources that result in inconsistent policy implementation and reliance on a one-dimensional system that uses only one strategy to prevent child sexual abuse leave organizations more vulnerable.

FINDINGS

CREATING SHARED RESPONSIBILITY

PGCPS uses a student perception survey administered to students whose teacher is On-Cycle for evaluation. At the end of the year, teachers receive a report of the responses from their students, and each school principal gets a report for all the teachers who are On-Cycle in that school. Questions that target the following areas are used as part of the survey:

- Classroom Climate: Perceptions of the overall social and learning climate of the classroom.
- Classroom Engagement: Student attentiveness and investment in classes.
- Classroom Teacher-Student Relationships: Strength of the social connection between teachers and students within and beyond the classroom.
- Classroom Belonging: Students’ beliefs that they are valued members of the classroom community.

In addition, PGCPS administrators participate in The Vanderbilt Assessment of Leadership in Education, Val-Ed survey. The survey is a 360-degree survey that includes results from the administrator's supervisor, the administrator, and teachers who are supervised by the administrator. The following are some components of that survey:

- Quality Instruction (pedagogy)

- Culture of Learning & Professional Behavior
- Connections to External Communities

REGULARLY MONITORS CLIMATE AND BEHAVIORS

PGCPS has implemented the use of a culture and climate survey, the results of which are used to examine aspects of culture and climate and determine the specific goals needed to improve school climate. Results are also shared with the schools' Parent-Teacher Associations and Organizations (PTA and PTO). According to the most recent PGCPS climate survey, students generally felt that their school was a positive place. Of the students who responded to the survey, approximately 80% said they liked going to their school. More than 84% felt that their teacher cared about them, and more than 88% said they felt that if they had a problem they knew one adult who would help. Parents also had positive comments about the environment at the schools. More than 90% of the parents who responded felt that their child knew an adult who would help. More than 86% felt that the principal cared about all the students in the schools.

Students and adults should feel safe from physical harm in the school. According to the PGCPS climate survey, more than 78% of the students said they felt safe in their school. More than 79% of the students said their school is a safe place. More than 80% of the students said they have not been afraid of anyone in the school. Eighty-three percent of the parents who responded to the survey felt that their child was safe while in school. More than 90% of the parents said their child has not indicated that he/she is afraid to go to school. As indicated by the climate survey results, many parents and students have positive experiences in schools.

PROMOTE A SAFE ENVIRONMENT

Employees and administrators should work hand in hand in supporting safety within the school building. Administrators should have trust with their employees. Precautions must always be exercised, and responsible reporting must also be considered.

While students can report bullying and harassment anonymously to the school counselor and are able to leave notes for counselors about these and other issues, it is not as easy for allegations of child sexual abuse. PGCPS is currently studying ways to create an electronic method for parents and students to submit bullying and harassment reports as a result of the pilot program at two high schools where students may text in bullying issues. These text reports are then sent to the Executive Director of Student Services and also a representative from the school for follow up and action. PGCPS should explore the potential of the applicability of this best practice to other situations, including the ability for students to report suspicions of child sexual abuse.

This year, PGCPS put into place a 2016 Facility Security Checklist to review the safety of each school building. In addition, the school system is currently working on a database to communicate safety strategies and results.

There were a significant number of public comments related to school climate and culture. Comments were made predominately by parents/guardians and current school system staff. Comments included the need for more adult accountability, making safety and climate a system-wide priority, and implementing policies and strategies more consistently across all schools.

A few examples are listed below:

Area of Concern	Example Comments
Increased Accountability for administration and faculty	“There is the opinion in my community that there is a lack of real leadership with regards to discipline, mutual respect, and expectations of students, teachers, and parents. Additionally, there should be evidence of principal coaching and training.”
	“There is a severe lack of accountability at all levels. If employees aren't informed of their duties and responsibilities as well as the consequences should they choose not to uphold those duties and responsibilities, some employees will take advantage of the system because they know there are no consequences for their actions. The onus should be on administration and county leaders for creating and maintaining a safe school culture and climate.”
	School culture is one of the most important aspects of preventing and detecting unusual or deceptive staff behavior. Strong leadership at the school level that is open to conversations and updated training for all staff is critical.
A need to make culture and climate a higher priority	“We like our open culture. The culture is helped by trust building that comes with teachers spending many years with the school and engaging with parents. I don't want normal caring adult interactions, such as hugs and touches on the shoulder to be sacrificed. Young kids need their expressions of caring at school. Some do not get it at home.”
Climate and climate practices are inconsistent and vary among schools	“School culture and climate varies from school to school and depends largely on the administration. Principals who are willing to listen to their teachers and allow them to have a say in how things get done have a more positive environment. Not all schools have a positive climate. Not all schools have activities that promote a culture of positive learning and full acceptance of others.”
Improved teacher – student relationships	School culture should be one of enthusiasm and optimism. And when students don't meet the standards set for them to reach, they should be met with hope and encouragement, not sarcasm and put-downs. If people working in the school system don't

	like their jobs, they should find another job. These kids need all the help and support they can get. And I know that a lot of them are hard to deal with, and so are their parents.
A need to make student safety a higher priority	Students' safety should always be the utmost priority of all administrators and staff in the school system. Employees and administrators should work hand in hand in ensuring safety within the school building. Administrators should have trust with their employees.
A need to standardize school safety procedures among all schools	I've been to schools where the Raptor system was not functioning properly. I've also been to schools where their sign in binders sat on tables, but contained no actual sign in sheets, and on some occasions the front desk staff didn't even know where to locate the sign-in sheets. Safety isn't a priority for some of our schools and staff. I was allowed into a high school building during a lockdown. The security guard even told me that no one is supposed to enter the building.
	Culture and climate should remain friendly but cautious. Procedures for checking identification should be standard operating procedure for all staff.

RECOMMENDATIONS

With respect to Culture and Climate, the Task Force recommends that PGCPSS consider:

- Increasing the accountability of leaders at the system level and in schools because leaders are ultimately responsible for culture and climate.
- Imbedding explicit language in administrative policies so that employees at the system and school levels are aware of and understand their collective and individual responsibility and accountability for student safety and the appropriate consequence(s) for failing to report.
- Reviewing system and policies and procedures relevant to child sexual abuse annually to reinforce consistent communication and uniform implementation of administrative procedures.
- Instituting a system of accountability to determine if practices are being implemented reliably in all schools.
- Developing a method to infuse questions and criteria regarding school safety and child sexual abuse into employee interview protocols as an indicator to applicants that the prevention of child sexual abuse is a core value.
- Creating a system level document that outlines guidelines for professional interactions between employees and students.

The Task Force recommends that individual schools consider:

- Hosting regularly scheduled opportunities at the school level for all employees to discuss child sexual abuse policies, procedures, and any changes that impact employees' responses, responsibility, and accountability, including the mandate to report suspicious behaviors.
- Hosting similar opportunities for parents/guardians, volunteers, vendors, contractors, and community stakeholders to discuss child sexual abuse and individual/collective responsibility for prevention across the school community.
- Using school building safety assessments to address the need to create and sustain physical environments that support student safety.
- Creating and implementing a system to acknowledge, praise, and encourage appropriate behaviors in order to reduce and eliminate fear of retaliation for reporting.

REPORTING AND STAFF TRAINING

KEY QUESTIONS

Are all persons who come in contact with PGCPS students trained on child abuse reporting requirements?

How is training compliance tracked?

Do training materials focus on recognizing the signs of abuse in addition to reporting abuse?

How is training delivered? Is it on line, in person or both?

Who delivers the training?

BACKGROUND AND CONTEXT

The policies and procedures of PGCPS promote training of specific groups of employees who interact with students. In the past, groups identified by PGCPS as mandatory reporters were trained online while others may have received in-person training. PGCPS recently modified its training to (1) touch upon warning signs of abuse or neglect, (2) articulate the investigatory role of Child Protective Services, (3) share the provision granting immunity for reporting in good faith, (4) provide hypothetical scenarios based upon previous cases, (5) discuss consequences for failure to report, and (6) provide an opportunity for questions and answers. Currently, this training is delivered by school system professionals who may or may not possess specialized expertise in child abuse or neglect.

PGCPS recently added volunteers to the list of groups required to undergo who need training. Within the last four months, principals delivered additional training to all staff within their specific school buildings; however, this did not include bus drivers, volunteers, vendors, or contractors. Currently, bus drivers, vendors, and contractors are not required to participate in formal training.

BEST PRACTICES

A number of best practices were reviewed to inform the review of current policies, procedures, and practices. While two models are specifically highlighted by the Task Force, this does not, in any way, limit the opportunities to examine and replicate other models that may be appropriate to a system of the size and complexity of PGCPS.

Model One

Two publications were used quite extensively in the review of what is currently available to school personnel and others who are committed to mitigating the circumstances that may result

in child sexual abuse. *Prevention Is Better Than Cure: The Value of Situational Prevention In Organizations* (Keith L. Kaufman, Ph.D., Haley Tews, B.S., Jessica Schuett, B.S. and Benjamin Kaufman, B.S., Spring 2012), and *The Situational Prevention Model: Creating Safer Environments For Children & Adolescents* (Keith Kaufman, Amber Hayes & Lee Anne Knox. Portland State University, Portland Oregon, 2010) were the predominant resources referenced to inform the work of the Task Force.

“The Situational Prevention Model” (SPM) of child/adolescent sexual abuse is based on Clarke’s (1995) work in general crime prevention. The model’s purpose is two-fold. First, it describes a systematic means of assessing a particular setting, organization, or program to determine situational risks or vulnerabilities that increase the chances that child/adolescent sexual abuse could occur. Second, each of these risks is linked to either prevention or risk reduction strategies to create safer environments for children and adolescents. This model is a dynamic approach intended for practical use by informed professionals” (p.3).

Kaufman, Hayes, and Knox also acknowledge that “at the core of the model is the Crime Opportunity Structure, which is composed of victim characteristics, target locations, and facilitators. Victim characteristics refer not only to individual attributes of the potential victim, but also to various characteristics of his or her family (e.g., parents both work two jobs). The Target Locations describes the particular characteristics of locations where abuse occurs within the setting (e.g., isolated or poorly supervised locations). Facilitators also represent an important factor that increases the risk of abuse. Examples may include poor quality staff, inadequate staffing patterns, or a lack of clear job descriptions. The presence of any of these factors increases the probability that abuse will occur” (p. 3).

Model Two

The second model, *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures* (United States Department of Health and Human Services 2007) operationalizes several key best practices that every child-serving organization should implement to create and sustain safe environments for youth, employees, and volunteers. The Health and Human Services (HHS) publication outlines six components that must be addressed in order to create and sustain the optimal environment include:

Component One	Screening and Selecting Employees and Volunteers
Component Two	Guidelines on Interactions between Individuals
Component Three	Monitoring Behavior
Component Four	Ensuring Safe Physical Environments
Component Five	Responding to Inappropriate Behavior, Breaches in Policy and Allegations and Suspicious of Child Sexual Abuse
Component Six	Training about Child Sexual Abuse Prevention

The HHS model suggests that monitoring and compliance are critical to sustainability of any practice that is intended to protect youth, employees, and volunteers. Additionally, the need to

keep youth safe is an essential component of the desire to create supportive and nurturing environments.

FINDINGS

There were 263 public comments related to training and reporting of abuse. Comments largely came from parents/guardians and current and former school system staff. There were several common themes noted in the comments, including the need for all staff to be trained; the need to check for understanding of the training; and the need to adhere to mandatory reporting responsibilities. A few notable examples are listed below:

Area of Concern	Example Comments
Proper reporting of abuse and neglect	All staff need to be trained on what constitutes abuse and neglect. All reports need to be taken seriously and taken through the principal straight to administration. All staff need to be trained on the new protocols and held accountable for them- failure to follow protocols should result in immediate dismissal and co-conspirator charges.
	We need to be trained and the reporting policy and procedures need to be “extremely” clear. Understanding the seriousness of abuse, we need to be careful when people say things like if you “feel” or possibly “think” without anything tangible to relate those feelings or thoughts to. This is concerning.
Inaccurate Reporting	I expect that when teachers and staff are well trained in what to report they will feel more comfortable about placing reports. That is a big responsibility and it would be too bad to accuse someone wrongly, as well as overlook something that needs reporting.
Recognizing and Reporting Abuse	I think teachers need to be adequately trained on reporting Child Abuse and Neglect. Also, it might be helpful to provide a checklist of signs of abuse and neglect.
Retaliation for Reporting	Would like something in place for staff to report other staff without fear of repercussions.
Overall Training	ALL staff should receive hands on training from someone associated with the Department of Social Services. Being told you are a mandated reporter is not enough. Training should include videos and scenarios. Also, Special Education para-professionals in CRI classrooms do personal care for students that require extra help. We should not feel insecure in doing our jobs because of this terrible incident.
Consistency of Training Model	More training will not solve this issue. The issue lies within the quality individual employee. You can train a person that has absolutely no motivation or desire to make the county better all you want; it will not change their performance or outlook. The additional training we received due to the recent incident was not consistent

	throughout the county. Every building did something different.
Periodic Training	Reporting of abuse and staff training has been lacking in the past years. Every year there are so many new staff members across all educational settings. This should be part of training at the beginning of every year and for anyone coming in after the start of the school year.

The Task Force conducted interviews and engaged in conversations with employees and had similar discussions with school system representatives. The following were identified as possible barriers to reporting:

- Employees, volunteers, and contractors may be afraid to report suspected due to beliefs that it will harm the reputation of a person if it is not true.
- Employees and volunteers may believe that the mere removal from the school during the investigative process is an irrevocable stain on the professional and personal reputation of that person, even if the allegations are later discovered to be unfounded.
- Employees, volunteers, and contractors may hold the belief that children may be dishonest when disclosing allegations of abuse and/or neglect.
- Employees, faculty, and staff, in the current climate, are afraid to occupy the same space alone with a child (e.g., hall, stairway, and classroom).
- A culture of fear, as currently seems to exist, negatively impacts any displays of affection toward children and thus negatively impacts relationships of trust between children and adults in the school setting inhibiting disclosure of abuse by students.
- Employees, volunteers, and contractors are not fully comfortable and do not completely understand what types of disclosures and observations of abuse should be reported and so are hesitant to report.

GAPS IN TRAINING

Task Force members attended and observed, firsthand, the training of volunteers at two sessions in April 2016. Subsequent dialogue with some volunteers and some school employees, a review of policies and procedures, and responses to questions presented to representatives of the school system led to identifying the following gaps:

- Currently, the training module does not identify characteristics of abuse, including grooming patterns, victim characteristics, change in behavior, environmental and situational prevention modalities, identification of vulnerable target locations, and characteristics of potential facilitators of abuse.
- Currently there are no agency partners participating in the training from the Department of Social Services-Child Protective Services (DSS-CPS), Prince George’s County Police Department (PGPD), State’s Attorney’s Office (SAO), or Prince George’s Hospital Center-Sexual Assault Center (PGHC-SAC).
- School system employees who deliver the training, while well-intentioned, are not subject matter experts and may not be able to sufficiently respond to questions or concerns raised during training.

- Currently there is no policy or administrative procedure detailing what the training should include, how the training is to be conducted, what accountability measures are in place to monitor who has been trained, or what protocols are in place to test the understanding of and compliance with the training;

RECOMMENDATIONS

With respect to Reporting and Training, the Task Force recommends PGCPS consider:

- Creating a partnership with a multi-disciplinary team representing DSS/CPS, PGPD, SAO, and PGH-SAC to understand, train, and implement Board of Education policies regarding the specifics of who is required to report, when and how to report, and related discipline and civil penalties for failure to report, where applicable.
- Mandating all employees, (administrators, teachers, and staff), volunteers, visitors, vendors, contractors, and anyone who regularly enters any educational facility to personally and directly report any suspected child sexual abuse and/or neglect to the Department of Social Services, the Police Department or the State’s Attorney’s Office, and the school principal in accordance with the policy.
- Providing regular and consistent opportunities for parents and guardians to receive training, so that they recognize the signs of grooming and sexual abuse, know to whom to report, and how to seek assistance for their child if abuse is suspected.
- Partnering or contracting with subject-matter experts to provide training to parents and guardians.
- Incorporating a centralized mechanism for tracking all allegations or breaches of policy involving interactions between students and employees.
- Develop and implement a mechanism for analyzing and monitoring the tracking mechanism and using the data and reports to identify patterns of behavior that may be putting children at risk.
- Using Darkness to Light’s evidence-supported and nationally-evaluated training prevention program, Stewards of Children, for all school personnel, parents, volunteers and youth, aged 16+, which has been identified as a “Top 5” program in the area of child rights or some comparable training program.
- Collecting, analyzing and reporting compliance with mandatory in-person and online training requirements, including tracking and monitoring and pre and post assessments.
- Presenting an annual report on the implementation of strategies, subsequent outcomes, and improvements across the system for training, reporting, and compliance.
- Evaluating evolving best practices regularly to update training and make changes to policies and/or procedures as necessary.
- Creating an actionable plan to train all PGCPS board members, employees, volunteers, vendors, and contractors in both face-to-face and online modalities.
- Requiring school administrators to conduct annual evaluations to identify and resolve all vulnerabilities, both physically in school facilities and in victim-centered vulnerabilities, using as a reference the factors discussed in the *Situational Prevention Model: Creating Safer Environments for Child & Adolescents* by Keith Kaufman, Amber Hayes, & Lee Anne Knox or another comparable model.

- Putting protocols in place to evaluate the effectiveness of the training curriculum and delivery model and use the analysis to make changes, as appropriate and necessary.
- Tailoring training methodologies for each group in recognition of the various levels of education of administrators, teachers, staff, volunteers, vendors, and contractors to include the many ways that learning and absorption of information and concepts occur.

SCREENING OF EMPLOYEES, VOLUNTEERS, VISITORS, VENDORS, AND CONTRACTORS

KEY QUESTIONS

What are existing procedures for screening employees and volunteers?

Is the current method of screening employees and volunteers effective?

Is there room for improvement?

BACKGROUND AND CONTEXT

Several administrative procedures describe processes that impact the topic of screening employees and others and are noted as follows:

Administrative Procedure 4215 - Criminal History Checks (December 1, 2013) states that the procedures “clarify the process of criminal background checks and fingerprinting” for potential employees and volunteers. A partial update was issued by memorandum to all Instructional Directors and Principals on February 23, 2016.

Administrative Procedure 4216.6 – Volunteers (December 15, 1998) outlines, among other processes, procedures for screening and utilizing volunteers.

Administrative Procedure 0500 – School Visitors (August 15, 2013) outlines procedures governing visitors to schools.

PGCPS Visitor Management User’s Guide (August 20, 2014) is used to process visitors through the school-based Raptor V-Soft system that went into operation at the beginning of the 2014-2015 school year.

CURRENT POLICIES AND PROCEDURES FOR EMPLOYEES

According to Administrative Procedure (AP) 4215, all employees, including substitute teachers, student teachers, interns, and all paid/unpaid coaches, coaching assistants, and “others assisting in an athletic program” are required to undergo fingerprint background checks. Additional information provided by PGCPS, in response to questions, revealed that fingerprint background checks are conducted by an external vendor with the ability to scan fingerprints and check them against criminal history data found in the State Criminal Justice Information System and the Federal Bureau of Investigation. The cost is about \$58 per individual and is paid by the prospective employee. The results are received with 48 to 72 hours and are processed by the Background Unit in the Office of Human Resources, using a manual to interpret the results.

ACTUAL PRACTICES

All employees undergo a criminal background check, using fingerprints, which is received and reviewed before the employee is considered eligible for hire. This type of check provides information on arrests, charges, and trial disposition information, including probation before judgment and cases that were not prosecuted (*nolle prosequi*). The information is updated automatically. In addition, as of 2015, prospective employees also are checked against the Child Protective Services database for indicated findings of abuse or neglect. AP 4215 specifically mentions substitute teachers, student teachers, and interns, but does not mention the need for substitute non-professional employees to undergo a fingerprint criminal background check. However, it is important to note that PGCPS requires that all prospective employees, professional and non-professional, undergo a fingerprint criminal background check prior to hiring.

There are no formally adopted policies, administrative procedures, or commonly-held guidelines that impact the hiring decision when an applicant's criminal background check is absent indicated findings of abuse or neglect yet may be questionable. Presently, staffs rely on guidelines developed and used by the Baltimore County Public School System, along with the judgments/experiences of the Director and/or a small group of human resource administrators.

POLICIES AND PROCEDURES FOR VOLUNTEERS

According to AP 4215 and AP 4216.6 that govern criminal background checks and volunteers, a volunteer is defined as an individual providing a service without financial remuneration from the school system. Any volunteer or mentor for whom "uncontrolled access" to students is anticipated, including chaperones on overnight field trips, is required to have a fingerprint background check. "Uncontrolled access" is defined as "any time an individual is not supervised by PGCPS staff." The procedural update mandates that volunteers having unsupervised access to students occur in very limited circumstances.

Prior to the recent procedural update, a lack of clarity existed for those volunteers and mentors who accessed schools on a one-time basis or sporadically, such as a book fair or school dance. Because they were not considered to have uncontrolled/unsupervised access, a fingerprint check was not required. The administrative procedure, at the time, did not state whether a commercial background check was required or if no background check was necessary.

The recent procedural update clarified this, stating that "[v]olunteers working for a one-time event who are NEVER alone with children" do not need any background check. In addition, those who volunteer for a one-time event, such as career days, book fairs, school dances, bake/food sales, Read Across America, or judging a science fair do not need any background check, as it stood prior to the recent update. The update changed the administrative procedure to require that **ALL** volunteers undergo either an annual commercial background check (most frequent) or a fingerprint background check for those "very limited circumstances" where there is uncontrolled/unsupervised access to students.

Those who volunteer in a classroom on a “regular basis” or chaperone a day field trip are required to undergo a commercial background check annually. The procedural update now requires all volunteers to undergo a commercial background check, unless the volunteer has uncontrolled/unsupervised access, which requires a fingerprint check. A commercial background check searches Maryland court records based on information provided by the individual. The cost is approximately \$7.00, paid by the volunteer. The results are received with 24 to 48 hours in the Background Unit in the Office of Human Resources.

The school principal determines whether a volunteer or mentor is anticipated to have uncontrolled/unsupervised access. Prior to the procedural update, the principal also was responsible for determining whether, based on the school volunteer sign-in log, the person volunteered on a “regular basis” or was chaperoning a day field trip. A copy of the school volunteer sign-in log is to be kept for three (3) years and is maintained by the “Site-Based Volunteer Coordinator,” according to the Administrative Procedure 4216.6. Principals are to require a volunteer to produce “a receipt documenting completion of the requisite background check.” The receipts are kept on file and a list is made of those individuals eligible to participate on field trips and other activities.

ACTUAL PRACTICES

The staff positions of “School System Volunteer Coordinator” and “Site-Based Volunteer Coordinator” do not appear to exist. It seems likely, however, that the function of maintaining the volunteer sign-in log falls to one of the administrative staff in the main office. It is unknown whether schools separate the volunteer log and visitor log.

In the update to Administrative Procedure 4215, **all volunteers are now undergoing a commercial background check.** Despite the definition of “volunteer” as someone who provides service without remuneration, there are paid and unpaid coaches. Unpaid coaches do not appear to be considered volunteers, since coaches of any sort are required to have fingerprint background checks. It appears to be unlikely that the apparent inconsistency in policy has caused any practical difficulties.

The extent to which school principals are distinguishing between volunteers/mentors who have uncontrolled/unsupervised access to students and those who do not have such access is uncertain. However, it does appear to be clear in the procedural update that instances of uncontrolled/unsupervised access are viewed as infrequent occurrences. **It also is uncertain whether all volunteers who undergo a commercial background check do so every year, as required.** The receipt given to the principal by a volunteer only confirms that the individual paid for the commercial check, not that the individual successfully completed it.

VISITORS, VENDORS, AND CONTRACTORS

According to AP 4215, independent contractors and outsourced agency employees with “uncontrolled access” to children (or outsourced workers whose assigned duties are likely to

involve unsupervised contact) undergo a fingerprint background check. If “no uncontrolled access is anticipated,” then such personnel “may” be required to undergo a commercial background check. Each contracted employee or outsourced worker is to complete a “Background Check Application” form and “Authorization and Release for the Procurement of an Investigative Consumer Report.”

Under AP 0500, all visitors must sign-in on a visitor log that is to be maintained for three (3) years. It does not appear to be consistent practice that visitors are escorted from the main office to their destination. In the Visitor Guide, the Security Services Department is responsible for ensuring that visitors and employees/representatives of vendors and contractors are checked through the Raptor System which scans the individual’s driver’s license information against sex offender data bases in the United States. Visitors and employees/representatives of vendors and contractors are not escorted, but are required to wear a visitor badge that includes a photo of the person, the person’s name, the reason for the visit, and the time and date of the visit.

If a visitor matches a name in a sex offender data base, the administrator or security official is notified. The principal may allow a supervised visit if the person has a dependent who is a student at the school. An employee/representative of a vendor whose name matches one in a sex offender data base will be accompanied by a school administrator or officer while delivery is made and then the employee’s/representative’s supervisor is contacted and informed that the individual will no longer be permitted to make deliveries to any PGCPS school or facility. An employee/representative of a contractor whose name matches one in a sex offender data base is asked to leave campus, and then the employee’s/representative’s supervisor is contacted and informed that the particular person will no longer be permitted to work in any PGCPS school or facility.

ACTUAL PRACTICES

Due in whole or in part to the new law that went into effect July 1, 2015, **employees of all contractors/vendors, and subcontractors are required to have their employees undergo a fingerprint background check.** It is made a requirement of their contracts with PGCPS by the Purchasing Department. The results of these checks are sent to the Background Unit in the Office of Human Resources for appropriate follow-up.

FINDINGS

The current Administrative Procedures and other guidance regarding the screening of employees, volunteers, vendors and contractors are sometimes unclear, occasionally contradictory, and not always aligned with current practices. In addition, the Task Force was unable to confirm whether there is any mechanism in place to regularly examine (spot check) whether processes or procedures are being implemented or implemented correctly. Overall, the Task Force recommends that staff in a different department or, perhaps, within the PGCPS Security Services or from the newly constituted Compliance Department suggested within this report be charged

with periodic, e.g., quarterly, unannounced spot checks at schools and within Human Resources to learn of and, if necessary, implement corrective action to address perceived shortcomings.

EMPLOYEES

Since October 1, 1986, all employees (professional and non-professional) undergo a criminal background check which will report arrests, charges, and disposition of cases in all states through the FBI database and in Maryland through the State's Criminal Justice Information System ("CJIS"). More recently, prospective employees also are checked against the Maryland Child Protective Services ("CPS") database for those individuals who have been identified as "indicated" for child abuse or neglect by that department. Unlike the fingerprint background check, the CPS system does not alert for future changes in the status of employees who have undergone checks. These background checks are completed before a prospective employee can be considered for hire.

It is clear from the online comments made in response to the Student Safety Task Force Survey that many employees and community members may be unaware that PGCPS does extensive pre-employment screening of prospective employees; they are unaware of what is covered by the background checks; and they are unaware that the FBI and CJIS reports are automatically updated when new information becomes available. Although there are agreed upon rubrics for evaluating the information in a criminal background check and a process for considering those that may fall into a grey area, there is no formally adopted manual or guideline for decision-making once a criminal background check comes back with some reported criminal history.

VOLUNTEERS

The distinction between "one-time" or sporadic volunteers and those who volunteer in a classroom on a "regular basis" or chaperone a day field trip was wisely eliminated in the update to Administrative Procedure 4215. However, the distinction between those volunteers who are "anticipated" to have uncontrolled access (defined as unsupervised by a PGCPS employee) to children and require a fingerprint check and those who are not anticipated to have uncontrolled access and only need a commercial check only remains. The peculiarity is based on the principal's judgment which is subjective and places an additional and probably undue burden on the principal.

Any volunteer in a school building is not going to be under a PGCPS employee's supervision 100% of the time and those who volunteer frequently, and therefore are familiar to staff, are more likely to have less supervision. Moreover, further review may show that those volunteers who are not anticipated to have unsupervised access do not get a commercial background check each year as currently required. Online comments made in response to the survey reveal considerable anxiety about school volunteers and screening processes.

VISITORS, VENDORS, AND CONTRACTORS

Visitors are all assumed to be checked through the Raptor system; however, there is not enough information to ensure they are escorted to their destinations. Employees of contractors and vendors are all presumed to undergo a fingerprint check, therefore, it is unknown why an “Authorization and Release for the Procurement of an Investigative Consumer Report” is required as part of the administrative procedure governing criminal history checks. This appears to be a requirement that would more appropriately be a part of the bid/procurement documents. Responses to the online Task Force survey produced relatively few comments about visitors and/or vendors and contractors

Samplings of comments made in the online Task Force survey follow:

Area of Concern	Example Comments
Criminal History Checks	There should be mandatory FBI, Local, and Criminal History checks for every jurisdiction resided in the past 10 years or more.
	A deep screening and firm check of references and background should be done before hiring is done.
	FULL background check (FBI) [should be required]
	All employees should be screened every school year at least twice a year to make sure there are no pending allegations of child abuse.
	Screening needs to be done on every employee every so many years.
	ALL employees must have a REAL background check before hiring and perhaps a review every few years
Screening of Employees and Volunteers	Independent Screening (in depth background and fingerprinting) should be a top priority as it relates to employees or volunteers.
	I have been able to volunteer in my child’s school in the classroom without a background check and I find this concerning as it means that anyone can do the same.
	I have walked into schools and not been asked for ID.
	As an employee, the screen process is thorough. I do not know about the process for volunteers, but it should be the same.

	I think that employees and volunteers need to be screened more thoroughly and go through a rigorous process. Community Member: We believe that the screening process for employees could always be improved, but Volunteers is critical
	I believe that volunteer should be screened as the employees are no matter what school they will be volunteering at.
Screening of Visitors, Vendors, and Contractors	All volunteers/parents coming into the school should be escorted to the class they are going to.
	Adequate based solely on my personal experience of having my driver’s license scanned each time I enter the school.
	Visitors are expected to wear paper badges. Some do and some don’t.
	The RAPTOR system and the security doors and cameras are repeatedly (weekly) experiencing problems making it difficult to perform that piece of security.

RECOMMENDATIONS

With respect to Screening, the Task Force recommends PGCPS consider:

- Continuing thorough pre-employment screening of all employees, including substitutes and anyone receiving a salary or wage from PGCPS, through the Federal Bureau of Investigations (FBI), State Criminal Justice Information System (CJIS), and State Child Protective Services databases.
- Adopting, formally, guidelines for evaluating information from criminal background check reports, including the “bright line rules” prohibiting the hiring of those with certain profiles and procedures for grey area decisions to help ensure consistent decision-making.
- Having all volunteers (except those who are escorted and under the supervision of a PGCPS employee at all times while on campus, e.g., judging a science fair, one-time classroom speaker) undergo a fingerprint background check which (1) is automatically updated (rather than commercial checks that must be redone each year); (2) covers surrounding states (through the FBI check); and (3) would create a central data base which currently does not exist for volunteers.
- Providing an income-based mechanism for assisting eligible parent volunteers with the cost of a fingerprint background check.
- Creating a database of visitors so that “frequent” visitors, however that may be defined, undergo additional scrutiny.

- Monitoring visitors with existing or additional security cameras in lieu of escorts or current practice.

For Employees

- Continuing thorough pre-employment of all employees, including substitutes and anyone receiving a salary or wage from PGCPSS, through the FBI, State CJIS, and State Child Protective Services databases.
- Rechecking employees after hire, if feasible, against the CPS database, either annually, at set intervals, or on a rolling basis every X years after hire.
- Adopting guidelines for evaluating information from criminal background check reports, including the “bright line rules” prohibiting the hiring of those with certain profiles and procedures for grey area decisions.
- Training personnel in implementing those guidelines to help ensure consistent decision-making.
- Improving communication to parents/guardians, current and former employees, students, and the public about pre-employment background checks and procedures.

For Volunteers

- Having all volunteers (except those who are escorted and under the supervision of a PGCPSS employee at all times while on campus, e.g., judging a science fair, one time classroom speaker) undergo a fingerprint background check which is automatically updated (rather than commercial checks that must be redone each year), covers surrounding states (through the FBI check), and creates a central data base which currently does not exist for volunteers.
- Providing an income-based mechanism for assisting eligible parent volunteers with the cost of a fingerprint background check, when required.
- Revising the definition of volunteer to eliminate remuneration as the distinction between employee and volunteer since there appears to be “paid volunteers” and unpaid coaches. This clarification is less important if, like employees, all volunteers undergo a fingerprint background check.

For Visitors, Vendors and Contractors

- Escorting visitors, vendors, and contractors, if feasible, while they are at the school site.
- Creating a database so that “frequent” visitors, vendors, and contractors, however that gets defined, undergo additional scrutiny.
- Monitoring visitors with existing or additional cameras in lieu of escorts or current practice.
- Continuing use of the RAPTOR system.
- Ensuring prompt reporting of malfunctions and repair of cameras or RAPTOR equipment.

- Updating the Visitor's Guide to eliminate vendors and contractors from the Raptor process.
- Creating or adding to any existing administrative procedure governing vendors and/or contractors the obligation of contractors/vendors and their subcontractors to have their employees undergo fingerprint background checks before and if they enter school property.
- Developing some uncomplicated but effective way to identify employees of contractors and vendors who have undergone a fingerprint background check and have been approved to work on school campuses.
- Creating a system for notifying the schools or the appropriate system office when, due to an emergency, a worker who has not been cleared needs to enter a school campus so other precautions can be implemented to supervise that individual while on site.

Curriculum and Counseling

KEY QUESTIONS

What are the strengths and weaknesses of the curriculum with respect to strengthening childhood sexual abuse prevention?

How can the curriculum be improved?

How, if at all, can counseling resources be better utilized for the prevention of childhood sexual abuse?

BACKGROUND AND CONTEXT

The State of Maryland, in COMAR 13A.04.18.01, requires that each county adopt a comprehensive health education instructional program for grades K - 12. These regulations, as currently written, require that “Students will demonstrate the ability to apply prevention and intervention knowledge, skills, and processes to promote safe living in the home, school, and community.” However, there is no specific language directed to child abuse or childhood sexual abuse.

In the Maryland General Assembly 2016 session, legislators passed HB 72, which requires the State Board of Education and each nonpublic school to “develop and implement a program of age-appropriate education on the awareness and prevention of sexual abuse and assault.” The bill specifies that the program shall be “taught by a teacher who is trained to provide instruction in the awareness and prevention of sexual abuse and assault” and “incorporated into the health curriculum of each county school board and each nonpublic school.” The law takes effect on July 1, 2016.

Counselors are available to all Prince George’s County students, with one available in every school. Primary duties include addressing crises, assisting with behavior issues, conducting mediations, referring to care, and assisting with career counseling, college applications, and financial aid.

According to Professor Elizabeth LeTourneau, Director of the Moore Center for the Prevention of Child Sexual Abuse at the Johns Hopkins Bloomberg School of Public Health, best practices for curricula include up-to-date, accurate, and comprehensive materials without information that “may increase self-blame or victim blaming.” Professor Letourneau reported that best practices include:

- (a) Substantive parent input;
- (b) Multisession dosage with a minimum of 4 sessions; and

(c) A combination of skills practice formats including modeling, skills rehearsal, and group discussion formats.

She adds, “Emerging evidence further supports the importance of (d) delivering curricula to mixed gender classrooms and (e) utilizing developmentally appropriate yet unambiguous terminology, in particular regarding sexual behavior.” Additional recommendations are found in her memorandum (see Resource Section) attached as an addendum.

FINDINGS

CURRICULUM

It is important to put the review of the curriculum in context. Preventing abuse of children is the primary responsibility of adults, not children. In fact, one of the leading misconceptions about child abuse is that a central part of the prevention is to teach children to be able to recognize potential abuse and resist. In fact, according to experts, this is extraordinarily difficult for children, especially when abusers are trusted adults.

Nonetheless, an effective curriculum on safety and abuse for children and their families can educate parents, increase disclosure, and reduce self-blame. The Task Force requested and received copies of curricular materials provided for K-12 education about safety and abuse. Information also was requested and received pertaining to school system policies related to these teaching materials, including whether there are mechanisms to determine if the curriculum is delivered as intended.

Professor Elizabeth Letourneau reviewed the health curricular materials. The Task Force also reviewed public comments related to the curriculum. PGCPs identified eight lessons, written approximately seven years ago, between ages K to 12 for student safety. These are included in the following Table:

Grade	Lesson Number	Topic
2	Lesson 19	Personal Safety
3	Lesson 13	Safety Around Others
4	Lesson 18 Lesson 19 Lesson 20 Lesson 21	Recognizing Harassment Behaviors Part 1 Recognizing Harassment Behaviors Part 2 Abuse and Assault Feeling Safe
8	Lesson 26	Preventing and Coping with Abuse
High School	Lesson 25	Personal Safety

In elementary school, the health classroom teachers teach the lessons. In middle school and high school, the physical education teachers, certified in health education, teach the health lessons.

Lessons do not require family engagement. The available content on all eight lessons, as well as the rest of the health curriculum, are included in attachments.

There is no mechanism to determine if the courses are taught as intended, and the responsibility for implementation of curricula generally lies with individual principals. The Task Force was informed that, “[T]he curriculum office which oversees the health lessons taught by classroom teachers does not have the ability to determine if the teachers are teaching the specific lessons on personal safety.” In addition, the Task Force learned that gaps exist in professional development and training of teachers responsible for the health curriculum.

Professor Letourneau’s review begins by providing context on the role of curricula for children in preventing childhood sexual abuse. She emphasizes, “First and foremost, responsibility for the prevention of child sexual abuse rests with adults and not with children,” [a]dding “school curricula that rely on training children to keep themselves safe inevitably falls short of prevention goals unless such trainings are part of a more comprehensive strategy.”

Elementary School

The review found the second grade curriculum focused excessively on “stranger danger” rather than awareness that adults they know can be a threat. She found one of the lessons to be “more likely to generate confusion and anxiety rather than useful skills or knowledge.” She found nothing relevant in the Grade 3 curriculum and expressed concern that the Grade 4 curriculum provided limited information to help children understand “how to report abuse” and “who perpetrates abuse” with “no clear guidance that the abuse is never the child’s fault.”

Middle School

Professor Letourneau reviewed five potentially relevant lessons in middle school, but found that only one presented information on child sexual abuse. She found there to be “no discussion of the legal consequences for abuse; abusers are said to feel guilty or ashamed of their behavior.” In addition, she noted that there is “limited information on how to report abuse.”

High School

Professor Letourneau reviewed four potentially relevant lessons and found a “lack of coherence and comprehensiveness in the presentation of sexual abuse prevention materials to high school students.” She added, “The material is woefully outdated and frequently employs vague, unclear, or incorrect terminology.” She also found that the material has insufficient information on abuse experienced by boys, abuse perpetrated by girls or women, abuse in the context of same-sex relationships, and abuse outside the context of a dating relationship. She noted, “There is a pervasive message that if someone simply speaks up with sufficient assertiveness, ‘she’ should be able to prevent sexual abuse.” She concludes:

It is my opinion that this curriculum is unlikely to achieve increased accurate knowledge about child or adolescent sexual abuse, is unlikely to support self-disclosure of current or

past abuse, and is likely to foster rather than mitigate self-blame among victims and victim-blaming attitudes among non-victims.

Professor Letourneau made several recommendations related to the overall structure of a child sexual abuse prevention approach. With respect to curriculum, she advised that the School System,

Revise existing curricula in consultation with a child sexual abuse prevention expert to ensure that content are up-to-date, accurate, and comprehensive. Revisions should attend to removing content that may increase self-blame or victim blaming. Content should be presented across at least four related lessons and revised to include skills practice components and parent input. Material should overtly address the victimization of boys as well as girls, and the abuse of youth who identify as LGBT. Material should avoid a “stranger danger” focus and instead reflect the reality that older children and adolescents as likely to engage in sexually intrusive or abusive behavior as are adults who are known to the victim.

There were more than 50 public comments in the Task Force survey related to school curriculum on student safety. Generally, school system employees reported the need for a greater focus on student safety, with enhanced training for teachers and counselors. For example, one employee wrote “more needs to be done,” and another reported, “We didn’t get a lot of training in this area.”

While several parents said that the safety curriculum was adequate, most comments found it to be insufficient. One wrote, “It is dated as all get out to the point of hilarity.” Another said, “I just asked my child about this and he tells me that they've only had one conversation about this at school and he can't remember what was said.” A third said, “I think this is an area sorely lacking, especially in elementary school. The only education I have seen has come since the events of this school year and that was through a parent education night, not even with the students.”

A number of comments included recommendations on curricular changes. Notable examples are provided:

Area of Concern	Example Comments
Parent Training	Parents and students should attend a prevention night once a year that teaches and informs both parents and students. Parents that cannot attend should be sent home prevention info packets that they have to sign.
	If we are going to have sex education classes given then we need to include sexual abuse conference with the inclusion of parents EVERY

	year. Kids need to know and understand what sex abuse is. I have talked to my children about sexual abuse but some parents don't but I consider it to be extremely necessary information.
	I would encourage PGCPs to provide parent seminars on how to empower our children and prevent them from becoming victims. I am also okay with this sort of curriculum being taught by Guidance Counselors.
Independent oversight	Curriculum and Counseling should be provided by independent organizations/individuals should be hired to develop curriculum and counseling.
Frequency of lessons	Refreshers of such training need to be on an annual basis to assist children in being armed to protect themselves and assist in keeping our schools safe.
Content for classes	Grooming behavior and signs, the components that influence risk to becoming an offender or victim, normative behavior and appropriate developmental stages related to sex, boundaries, readings discussing "my body belongs to me", encouragement of telling, disdain for "no snitching", direct and assertive communication skills, how to encourage disclosure without leading the child or making them fearful of telling what happened and with whom.
	Perhaps school curriculum could include classes on interpersonal skills, education classes on abuse, bullying and other safety measures taught to children in elementary school, so early on they will know what inappropriate behavior is and that they will never get in trouble if they talk to someone about it.
	Abuse could and should be included in the health curriculum or in the guidance curriculum for grades K-12. We want our students to be well-informed and comfortable (not ashamed nor afraid) to express their concerns if something is going on with them or a peer.

Through interviews with Prince George's county staff (i.e., teacher, pupil personnel worker, and psychologist), staff asserted that the curriculum is not sufficient to address the problem of sexual abuse risk and/or experience. In general, they felt that an improved curriculum was necessary to adequately address the social emotional needs of students in general. The psychologist contended that all children should have access to some curriculum around personal safety (including sexual abuse) every year, which should be very concrete with explicit instruction regarding who to speak to if they are concerned about inappropriate adult behavior. The teacher

stated that the curriculum should extend throughout the grades, including the youngest children (i.e., pre-Kindergarten). There was also a suggestion that the topic could be integrated into current social skills curricula that are used in the lower grades, which would allow for symbolic objects (e.g., dolls, puppets) to be utilized to facilitate children’s understanding of the topic.

The health curriculum is one component of a comprehensive approach to child sexual abuse prevention. It should provide high quality instruction to children and engage parents/guardians. According to expert review and consistent with the comments of school employees and parents, the curriculum may be confusing, warrants review, and does not appear to engage parents. Moreover, there is a need to assure that children receive the intended content in health classes.

FINDINGS

COUNSELING

Counselors can help establish a strong school climate around student safety, assist with teaching sensitive topics, and address questions and concerns from parents, teachers, and staff. The Task Force inquired whether there are special trainings for counselors with respect to child abuse prevention. The response was that counselors are part of a group required to take a Teachscape training entitled “Reporting Child Abuse and Neglect.”

The training, provided as a power point resource, mainly restates legal requirements and provides a list of potential warning signs. It does not cover data on the prevalence or characteristics of childhood abuse, nor does it provide instruction on how to talk to children about abuse. PGCPs could benefit from specific monitoring to determine that teachers, counselors, or other personnel take this course and how those who have taken this course have done on their post-test evaluation.

Samplings of public comments include:

Requests for additional engagement by counselors.	It would help if each child visited the school counselor 2 times a year for a conversation about reporting abuse.
	Counselors should do monthly lessons with students to help them become aware/ understand how to prevent of certain things. When I grew up in PGCPs schools we had lessons in bullying, harassment, and things as such.
	Counselors are pretty accessible, and there's the call number, but I think a lot of students would be too shy or wouldn't know the number (they'd know how to find the counselor though). Maybe there should be forms more accessible and well-known to students, like the bullying

	reporting forms posted over every water fountain. For me, it'd be much easier and less stressful sending in a form anonymously.
Suggestion for ancillary staff to support counselors	In the school system you have Counselors that have a large case load, so what if a student feels like they cannot be heard, this could cause a problem, so maybe take a look at the retired Police Officers that may be willing to Volunteer to help to keep our students safe. I am a Pastor with a Chaplaincy Volunteer Program and again, another link to assist with working with the Counseling Department, to be a listening ear when the student just needs to share?
	Our guidance counseling team is top notch and they present topics and share the do's and don'ts to our leadership team or at a staff meeting almost every other week. Considering guidance counselors are required to handle specific matters there should be peer mediation, social workers, and psychologists that can help students to cope with their issues in a professional safe manner. When counselors are hired, some of them are not culturally and/or student sensitive.
More support for counseling as a service.	Counseling and psychological support are not held to the importance that they should be. There is a lot of turnover due to poor supervision or opportunities to further develop counseling skills and typically, schools utilize the school counselor to sub or cover lunch shifts and other tasks that are not pertinent to their jobs. This takes away from time that could be used for whole class, small group, and individual counseling.
	Students need more access to counselors and psychologists, particularly at the high school level where adolescence interferes with parent-child relationships and peer relationships rule. HS students need the support of adults that they feel is objective and will listen to their point of view. Students at lower grades need direct socialization of normative behavior to counteract maladaptive behaviors they may be learning at home or in the community. Implementation of restorative practices!!!
	More counselors are needed! Our school only has ONE counselor for an entire 600 student body. That's a disservice

	<p>to children. Counselors are extremely important as children need to be able to access someone other than a teacher for social emotional support. There also needs to be social emotional lessons starting from kindergarten to help young children acclimate to the elementary school environment. Presently there is nothing offered at our school because of lack of counselor time.</p>
Distractions	<p>Although there are counselors available at each school, it is such a sensitive issue, not every child will be comfortable talking with the counselors or their teachers. We're under such pressure to get things done that we may not even be aware that a child wishes to have a personal conversation with us because of time constraints.</p>
	<p>There needs to be a scheduled and efficient time frame for this topic to be trained and scenarios and questions need to have the support of the Professional School Counselor in each building. The PSC's are frequently doing block scheduling or other duties which takes their expertise away from being accessed for issues such as these. They are trained and educated to be highly effective in supporting the schools as a whole with these issues.</p>
Concerns about inadequate counseling services	<p>The counseling department does not engage with staff and students enough. How are teachers supposed to help students when their referral forms go unanswered? What are the consequences if a counselor does not respond to said referral? As far as I can tell, there are no consequences for not doing one's job regularly and with fidelity.</p>
Role in Climate needed	<p>The culture and climate of schools are very important. If the workers in a school believe that they can "get away with something" or that "no one cares" then they will act accordingly. I believe that it is important to survey students, staff and parents in order to ascertain whether or not students feel safe. School counselors should work hand in hand with administrators to enhance the school's climate.</p>
Praise for specific counselors	<p>The counselor at my school seems very nice and I'd know how to get to them if I had a problem.</p>
	<p>Our Principal trains us twice a year using her counseling</p>

	and experience background twice a year and with reminders when things come up in the news. Our motto is: what if it was your child? Our Principal knew more than the PPW when she came to reactively train us. Our counselor trains the children several times a year with lessons and fun activities that are serious but bring awareness and prevention.
	I love the counseling staff they real go out the way to help us. But fare as the curriculum it need to be change
Concerns about counselors	There is ZERO awareness & prevention of abuse. The counselor is ineffective -- does not even speak with students at the teacher's request. As a teacher, I can respond to my students' inquiries & impress upon them the importance of speaking up if at any time they feel uncomfortable, unsure, or just in need based on anything that is going on with them.

Interviewees' comments were consistent with the perception that staff, including instructional and student support, can be better prepared to facilitate children's discussion of difficult issues, such as sexual abuse. Each interviewee felt that additional training is needed around how to have these conversations with children. They felt that the on-line format of the training did not allow for staff discussion or responses to questions about the material to be able to integrate the material in meaningful ways.

Interviewees felt the training should help teachers understand the generalized and specific behaviors that children might exhibit if they are at risk for or are subject to sexual abuse. The psychologist felt the training should also help instructional and support staff know how to engage with students around these issues and to intervene with these children in an appropriate manner.

Similar to the Task Force survey comments, they also felt that more resources needed to be provided for student support. The teacher felt it extremely important to have a counselor in each building who could interact with students on a regular basis (i.e., weekly) around safety and seeking adult help when they felt vulnerable. Both the psychologist and the pupil personnel worker reported that student support staff should have more time to discuss sexual abuse prevention efforts with students (e.g., groups, discussion sessions). Each of the interviewees felt that one of the major reasons that students may not disclose to staff was that there were insufficient personnel in the counseling and student support areas to develop relationships with children that would allow them to trust these adults.

With the passage of House Bill 72, the State of Maryland will soon promulgate standards for instruction on child sexual abuse. However, it is not sufficient for PGCPS to expect that the

legislation alone will address the need for comprehensive instruction and parent engagement on child sexual abuse.

In addition to a high-quality curriculum, students should have access to counseling and other support services designed to prevent sexual abuse, as well as assist children who have experienced sexual abuse. Although a counselor was not available to be interviewed, other student support staff provided feedback regarding the need for these services. Below are recommendations that emerged from these interviews as well as public comment and review of school system policies.

RECOMMENDATIONS

With respect to Curriculum and Counseling, the Task Force recommends PGCPs consider:

- Consulting with experts on a curricular review in order to engage productively with the Maryland State Board of Education as it issues regulations later this year on instruction related to this topic.
- Developing and implement a training program for identified teachers and counselors on how to teach child sexual abuse prevention.
- Developing an oversight approach to assure that teachers and counselors have adequate access to and supports for ongoing training.
- Developing an oversight approach to determine if the prevention of child sexual abuse content in classes is delivered as intended.
- Emphasizing parental engagement in lessons on child safety and give special consideration to the suggestion for special events for parents at school to learn about dangers facing their children -- and how to prevent them.
- Developing a systematic approach to including counselors in the effort to prevent child sexual abuse.
- Specifying the role for counselors in every school's abuse prevention efforts, making sure that information on this role is provided to parents.
- Assuring that counselors are well-trained for this role, with central oversight of training requirements, in-person and experiential approaches to training (i.e., not on-line), as well as consideration of the confidentiality issues that arise in these situations.
- Increasing the number of counselors and student support personnel available to students, with student to professional ratios more consistent with the recommendations provided by relevant professional associations.
- Addressing the social-emotional functioning of students in a more formalized way, specifically the provision of supports to students with social-emotional concerns such as automatic counseling for students with behavioral problems (which are often the result of trauma risk and experiences).

- Screening, if feasible and warranted, children with behavior problems for experiences of trauma (e.g., sexual abuse).
- Exploring risk for and history of trauma in student support meetings (e.g., IEP meetings, pupil personnel team meetings) for children presenting with behavioral problems.
- Developing formalized relationships with governmental and community-based service providers with expertise in child experience of trauma (e.g., Project Launch, mental health agencies, social services).
- Establishing or expanding existing peer support and counselor-supported services at the high-school level for students experiencing trauma.

REVIEW OF ADMINISTRATIVE PROCEDURES

The Student Safety Task Force also undertook a comprehensive review of Administrative Procedures and makes the following suggestions that impact specific procedures as noted:

SUGGESTIONS

With respect to Administrative Procedure 4216.6 – Volunteers, the Task Force suggests PGCPS consider:

- Specifying that volunteers must be provided and wear PGCPS identification, designating them as volunteers, when in schools at all times.
- Specifying that volunteers must sign in and out each time they enter and exit schools.
- Stating that any former employee who is coded or otherwise flagged as being ineligible to being rehired is also ineligible to being used as a volunteer anywhere in the school district.
- Developing a procedure that requires school leadership to communicate with and receive approval from Human Resources when using volunteers or former employees of PGCPS.
- Providing an avenue for costs to be waived or reduced for background checks and/or fingerprinting for those volunteers who meet certain income guidelines.
- Monitoring compliance of the requirement that every school must maintain a log of volunteers and a copy of the background check receipt for school records and for system audit purposes.
- Stating specifically that volunteers who work with students in a school must, at all times, be in the view of others, may not work behind locked doors, and may not work in a room with a closed door without a window or outside of public view.
- Specifying that volunteers may not discipline or threaten to discipline students.
- Specifying that volunteers may not have access to confidential records.
- Including in this procedure and in Reporting of Suspected Child Abuse (Administrative Procedure 5145) that all volunteers who work with students must undergo training on the reporting of suspected child abuse and neglect.
- Requiring specific training for leadership of Parent Teacher Associations (PTAs) and Parent Teacher Organizations (PTOs).
- Specifying that volunteers should neither transport students in the volunteer's personal vehicle nor allow students to drive their personal vehicle.
- Specifying that volunteers (and, for that matter, employees) should not use student restrooms.

With respect to Administrative Procedure 5145 – Reporting suspected Child Abuse and Neglect, the Task Force suggests PGCPs consider:

- Clarifying language so that it is clear that reporting to Child Protective Services or any other appropriate legal entity is concurrent with reporting to the school principal.
- Clarifying language on the timeline so that employees understand the immediacy of the oral report as opposed to the 48 hours for the written report.
- Adding “disciplinary action” language that speaks to “Consequences for Knowingly Failing to Report Suspected Abuse and/or Neglect or Interfering with Reporting.”
- Adding a mechanism in the Employment and Labor Relations Office for maintaining a confidential database of all alleged and confirmed cases of child abuse by employees--disaggregated by name, school, and school year—with the final disposition of all appeals and criminal proceedings duly noted.

With respect to Administrative Procedure 4215 – Criminal History Checks, the Task Force suggests PGCPs consider:

- Adding language that all newly-hired employees, volunteers, and contractors must receive clearances from Child Protective Services as of July 1, 2016.
- Ensuring that requests are scanned directly to the Department of Social Services which reports any adverse findings/indications to PGCPs.
- Providing a mechanism for costs to be waived or reduced for background checks and/or fingerprinting for volunteers, if they meet certain income guidelines.
- Revising language to mandate that commercial background checks are valid for one school year, rather than one calendar year, from issuance. This should facilitate the responsibility for school leadership to keep track of who is in compliance at the time of any activity.

With respect to Administrative Procedure 0500 – School Visitors, the Task Force suggests PGCPs consider:

- Incorporating specific procedures for Raptor V-Soft (visitor management software) as reflected in the 8/20/14 User’s Guide issued by Security Services.
- Mandating consistency for forms of identification for visitors as is required for school registration to avoid creating impediments for families of children enrolled in PGCPs.

With respect to Administrative Procedures 5180 – Use of Social Media in Schools and Administrative Procedure 4126 – Employee Use of Social Media, the Task Force suggests PGCPs consider:

- Changing the title of Administrative Procedure 5180 to “Student Use of Social Media.”
- Including language in the procedures that acknowledges the rapid change and advancement of technology and specifies the role and responsibility of the Chief

Executive Officer or designee to (1) identify the social media sites deemed appropriate, (2) provide the list to all school personnel at appropriately designated times during the school year, (3) update the PGCPS website, and (4) discontinue access to any designated social media site deemed inappropriate for instructional purposes.

- Including a specific statement in Administrative Procedure 5180 that students shall not accept personal invitations from staff members to use social media.
- Including language in Administrative Procedure 4126 governing employees that requires parental permission for to communicate via social media to students.
- Adding language that precludes the use by any employee of any social media platform utilizing a PGCPS device for the purpose of communicating with a PGCPS student that allows the anonymous posting of messages or the inability to trace the sender or recipient of messages.

TASK FORCE NOTE

During the review process, the Task Force was made aware of a pending policy regarding Dating/Inappropriate Relationships between Employees and Student. The Task Force did not evaluate the policy; however, we strongly recommend that the system follows its own procedures for creating such a policy and subsequent administrative procedures.

Conclusion

The Student Safety Task Force believes this report is focused, inclusive, and intentional in its attempt to identify the myriad of ways and opportunities that exist to support student safety and the prevention of child sexual abuse in our schools. Implementing the five major recommendations, the 61 considerations supporting the key areas of review; and the 28 suggestions to enhance current administrative procedures have the potential to assist the Prince George's County School System and its leadership at the system and local levels in implementing and sustaining exemplary practices while making significant progress in areas that require change.

We believe this work is not finished. It must be ongoing and intentional with regularly scheduled reviews of policies, procedures, and practices. There should be consideration to inviting consultants and subject-matter experts to engage periodically with System and school leadership to understand emerging best practices and implementation in the school environment. Whether in schools, within families, or in communities, all adults share responsibility for student safety. Prince George's County Public Schools has the opportunity to become a national leader by taking bold and concrete action, the goal of which is to enhance student safety and prevent child sexual abuse.

RESOURCES

Board of Education Policies

Board of Education Policy 0106 – Volunteer Services (amended 4/29/10)

Board of Education Policy 6153 – Field Trips (Amended 4/29/10)

Administrative Procedures

Administrative Procedure 0500 – School Visitors

Administrative Procedure 4126 – Employee Use of Social Media

Administrative Procedure 4156 – Granting of Administrative Leave or Temporary Placement for Employees

Administrative Procedure 4215 – Criminal History Checks

Administrative Procedure 4216.6 – Volunteer Services

Administrative Procedure 5143 – Bullying, Harassment or Intimidation

Administrative Procedure 5145 – Suspected Child Abuse and Neglect

Administrative Procedure 5180 – Use of Social Media in Schools

Administrative Procedure 6153 – Student Trips

Administrative Procedure 10203 – Access to Buildings after Normal School Hours or Office Work Hours

Forms/Guides/Memos

Child Abuse and Neglect Reporting Form (Attachment to Administrative Procedure 5145)

Child Abuse and Neglect Parent Guide

Memo regarding Raptor Visitor Management System

PGCPS Visitor Management User's Guide

Day Trip Form – Form “X”

Overnight Trip Form – Form “Y”

Trip beyond Continental Limits – Form “Z”

Emergency Medical Treatment Authorization Form

Information regarding Safe Dates Program

Information regarding Aggressors, Victims, and Bystanders Program

Health Education Lesson Plans

Grade 2 - Health Education/Curriculum Framework Progress Guide

Grade 3 - Health Education/Curriculum Framework Progress Guide

Grade 4 - Health Education/Curriculum Framework Progress Guide

Grade 7 - Health Education Lesson

Grade 8 - Health Education/Curriculum Framework Progress Guide

Grades 9 – 12 – Health Issues: High School Requirement/Curriculum Framework Progress Guide

Handbooks

Teacher Evaluation Handbook (10-16-15)
Principal Evaluation Handbook (8-12-15)
Student Rights Handbook (10-19-15)
PGCPS Facility Security Checklist
School Climate Quick Guide NCSSLE

Critical Area Questions and Responses

Culture and Climate
Reporting and Training
Screening of Volunteers, Visitors, Vendors, and Contractors
Curriculum and Counseling

Surveys

The Vanderbilt Assessment of Leadership in Education Framework
PGCPS Culture and Climate Survey
Student Safety Task Force Survey

External Experts

The Family Tree, Baltimore, MD
Moore Center for the Prevention of Child Sexual Abuse, Johns Hopkins University
Dr. Elizabeth Letourneau, Director

REFERENCES

National School Climate Center. (2016). National School Climate Center: School Climate: Frequently Asked Questions. Retrieved May 10, 2016, from <http://www.schoolclimate.org/climate/faq.php>

Prevention Is Better Than Cure: The Value of Situational Prevention In Organizations (Keith L. Kaufman, Ph.D., Haley Tews, B.S., Jessica Schuett, B.S. and Benjamin Kaufman, B.S., Spring 2012).

Prince George's County Public School System. (2016, April 1). *About PGCPs*. Retrieved May 13, 2016, from Prince Georges County Public Schools, <http://www1.pgcps.org/aboutpgcps/>

Preventing Child Sexual Abuse within Youth-serving Organizations: Getting Started on Policies and Procedures. *Centers for Disease Control and Prevention*. Saul, J., & Audage, N. C. (2007).

Review of Proposed Guidelines for the Prevention of Sexual Misconduct and Abuse in Virginia Public Schools, Board of Education Agenda Item, (January 2011).

The Situational Prevention Model: Creating Safer Environments For Children & Adolescents (Keith Kaufman, Amber Hayes, & Lee Anne Knox. Portland State University, Portland Oregon, 2010).

Review of Prince George's County School Curricula pertaining to the prevention of child sexual abuse, Memorandum, Elizabeth Letourneau, Moore Center for the Prevention of Child Sexual Abuse, Department of Mental Health, Bloomberg School of Public Health, Johns Hopkins, (May 2016).

Update on Child Abuse and Neglect Work Group, Montgomery County Public Schools, Memorandum, Joshua P. Starr (January 2015).