A CMSi Audit of the Blount County Schools Policy and Human Resources Management

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CMSi

CMSi Human Resources and Policy Review

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Central Question for the Audit

To what extent has Blount County Schools established a clear policy framework for managing personnel and performance feedback to ensure a positive, inclusive, and safe learning environment for all students?

Focus Areas

For all CMSi projects, the auditors have developed five focus areas based on the feedback and data requested by district leaders. For this project, the auditors focused solely on indicators related to **Focus Areas One** and **Five**. All five focus areas are addressed in the Curriculum Management Audit conducted for the district in January of 2025, which will be submitted in a separate report.

Following are the five areas, with the specific feedback requested:

District Vision and Accountability

The school district has a clear vision and demonstrates its control of resources, programs, and personnel.

Curriculum

The school district has established clear and valid objectives for students and clientele.

Consistency and Equity

The school district has demonstrated internal consistency and rational equity in its program development and implementation.

Feedback

The school district has used the results from district-designed or adopted assessments to adjust, improve, or terminate ineffective practices or programs.

Productivity

The school district has improved its productivity and efficiency, particularly in the use of resources.

Findings

Expectation: The School District has a Clear Vision and Demonstrates Its Control of Resources, Programs, and Personnel.

Focus: District Vision, Accountability, and Student Safety

Under this Focus Area, auditors review the scope and quality of policy (governance) and procedures across the school system for managing personnel and ensuring students a safe, welcoming learning environment. A school system meeting Curriculum Management Audit™ focus area indicators is able to demonstrate its control of resources, programs, and personnel so it can realize its vision and mission in educating every child effectively.

Attaining improved productivity and system effectiveness in school systems is dependent on the complex balance between a tightly-held organizational structure with the flexibility required by individual schools. This balance ensures responsiveness to schools' clientele within the consistent framework of district expectations for a safe and inclusive educational climate

Quality control is the fundamental element of a well-managed educational program. It is a major premise of local educational control within any state's educational system.

The critical premise involved is that, via the will of the electorate, a local school board establishes local priorities and expectations within state laws and regulations. A school district's accountability rests with the school board and the public.

Through the development of an effective policy framework, a local school board provides the focus for management and accountability to be established for administrative and instructional staff, as well as for its own responsibility. This framework outlines clear expectations for school-based decision making in the context of day-to-day instructional delivery, balanced with an understanding that individual schools need flexibility within that framework. Such a balance between clear and consistent expectations and school-based flexibility ensures that every child experiences a positive, safe learning environment that is still responsive to individual needs.

Although educational program control and accountability are often shared among different components of a school district, ultimately, fundamental control of and responsibility for a district and its operations rest with the school board and top-level administrative staff, and are defined in governing policy, procedures, and district plans.

What the Auditors Expected to Find in the Blount County Schools:

Common indicators include:

- A clearly defined vision for instructional delivery and student engagement in district classrooms that is congruent with best practice;
- Policy framework that:
  - Is centrally defined and adopted by the school board,

- ○ Establishes an operational framework for management that permits accountability and the development of administrative procedures;

- ○ Reflects state requirements and local program goals,

- ○ Reflects the necessity to use achievement data to improve school system operations, and

- ○ Defines and directs change and innovation within the school system to permit focus of its resources on priority goals, objectives, and mission;

- A functional administrative structure that coordinates and facilitates the implementation of board directives, and achievement of goals;

- A direct, uninterrupted line of authority from governing board to the superintendent/chief executive officer and other central office officials to principals and classroom teachers;

- Documentation of school board and central office planning and procedural guidelines for the attainment of goals, objectives, and mission over time; and

- Organizational development efforts that are focused on improving system effectiveness.

- Also, school facilities that are well-kept, sufficient, safe, orderly, and conducive to effective delivery of the instructional program;

- Support systems that function in systemic ways;

- District and school climate that is safe and conducive to continual improvement and program effectiveness; and a functional system for managing information that facilitates system improvement and responsiveness.

Overview of What the Auditors Found in the Blount County Schools:

The on-site auditor was asked to review personnel files, analyze policy, and assess the adequacy of systems for managing information related to personnel complaints or concerns. Overall, after reviewing all data, the auditors found that policy is congruent with state requirements and compliant; however, no administrative regulations are in place to guide school-based staff in the action steps needed to fulfill policy requirements, nor has there been any attempt by district leaders to further detail local expectations related to acceptable and unacceptable teacher conduct. Personnel files are up to date and have the minimum required documents and forms, but there is no central database linking this information in an easily searchable format to coordinate information across departments. Central office, although limited in its number of administrators, has no procedures in writing for coordinating their respectively assigned responsibilities. Administrators and principals rely on verbal communication for specific guidance related to the various situations that arise day to day.

A perception among the community is that teacher retention has been prioritized over student safety. The relationship between central office and the county has not fostered collaboration for the ultimate benefit of Blount County schools students. The central office is not adequately staffed to investigate and manage complaints. No processes are defined in an administrative procedures manual or any handbook that address follow up on complaints or concerns and, ultimately, their resolution. Some steps are clearly outlined, as in the case of harassment, discrimination, or sexual harassment, but there are no clear procedures for the subsequent follow-through.

Finding 1 presents the auditors' analysis of policy to establish clear expectations for ensuring student safety at every school and in every situation, and the need for clear procedures and systems to manage personnel and related information. **Finding 2** presents data from interviews and surveys that show the impact of recent events on the community's perception of the school district.

> **Finding 1: Policies delineating safety expectations for students and personnel are not sufficient to ensure consistency and accountability for implementing them district-wide. Human Resources does not have adequate personnel to manage personnel concerns, complaints, and investigations, nor to create an electronic management system for all personnel files and information. There is no centralized system for addressing and tracking concerns or complaints across all schools and departments.**

Safety for students is of paramount importance in every school district. The best policies for student safety in school districts should encompass a multi-layered approach, including robust physical security measures, strong anti-bullying policies, comprehensive mental health support, positive school climate initiatives, and clear procedures for reporting incidents, all while fostering open communication among students, staff, and parents.

Policy that expresses the school board's expectations for personnel conduct and student safety is insufficient and unclear. Accountability structures for the implementation of policy are not functional district-wide. When circumstances arise suggesting students may beat risk, procedures for administrators are critical. Procedures outline the everyday steps and tasks for following through on policy requirements, and note exactly who must take those actions, when or by what deadline, and what products or results must be shown.

To determine the quality and specificity of student safety expectations and guidelines in Blount County Schools, the auditor examined policy, handbooks, teacher evaluation instruments, state statutes, and related district documents; interviewed administrators and focus groups of principals, council members, and school board members; and collected online survey data from teachers, administrators, and parents. Overall, the auditors found that the district has insufficient direction for safety and information management practices in the district. Human Resources staffing to manage reports of complaints, safety concerns, and to investigate allegations of abuse or harassment is also inadequate to enable a thorough, immediate response and to enter and track data. This report finding addresses three key aspects related to managing personnel and ensuring student safety:

- **Policy and Procedures**: Adequacy of written direction for safety practices delineated in policy and procedures and the auditors' ratings.

- **Central Office Staffing**: Adequacy of the current staffing of human resources to address the demands of investigations and information management related to personnel and their performance.

- **Current District Procedure**: Adequacy of written direction for managing reports of harassment, discrimination, or other complaints as well as any district-related concerns by parents, students, or district personnel.

Policy Review

The auditors examined district governing documents and evaluated them against 29 criteria for the elements of clear guidelines for student safety. Note that these criteria address those expectations and directions stipulated in governing policy, procedures, or other documents, not the actions occurring in practice at district schools. The results of the evaluation are presented in the following exhibit.

Exhibit 1.1:   Key Elements of Effective Student Safety Policies*: Evidence in District Documents

POLICY DIRECTS OR REQUIRES		
I. Physical Security		
Safety Criteria	**Relevant Policies**	**Rating**
1. **Controlled access:** Limited entry points with security personnel monitoring access, visitor check-in procedures, and secure perimeter fencing.	**1.501: Visitors** **3.201: Safety** **3.202: Emergency Preparedness** **3.204: Threat Assessment** **3.205: Security**	Partially Met
2. **Surveillance systems:** Cameras strategically placed throughout the school building and grounds.	**None found**	Not Met
3. **Emergency drills:** Regular practice of fire drills, active shooter drills, and lockdown procedures.	**3.201: Safety** **3.202: Emergency Preparedness**	Not Met
4. **Building maintenance:** Regular inspections to address potential hazards like faulty wiring, damaged equipment, and unsafe building conditions.	**3.200: Building and Grounds Maintenance**	Partially Met

I. Physical Security:

1. **Controlled Access**: *Policy 3.205: Security* requires all doors to be kept locked but does not mention any other security measures, such as perimeter fencing, video surveillance, or how entry points are monitored. *Policy 3.205* notes that only the primary entrance should be in use during the school day. This policy further requires the director of schools to develop security procedures for the district. No such procedures were found. This criterion is partially met.

2. **Surveillance Systems**: No policy was found that relates to surveillance measures, although cameras are installed at most schools. This criterion is not met.

3. **Emergency drills**: *Policy 3.202* directs principals to develop and practice safety procedures, including fire drills. Shooter drills and lockdown procedures are not mentioned, although school principals reported past lockdowns. No procedures were found for proper drill, procedure adequacy, and accountability. This criterion is not met.

4. **Building Maintenance**: *Policy 3.200* directs principals to monitor the adequacy of all equipment and ensure it's operational. Policy makes no mention of wiring inspections, but the policy does address safety and requires the director to develop a plan for safety district-wide. Auditors found no plans or administrative procedures for inspecting and noting building safety concerns.

II. Harassment, Abuse, and Bullying Prevention		
Safety Criteria	**Relevant Policies**	**Rating**
5. **Clear definition of harassment and inappropriate behaviors (those technically not illegal but undesirable), by students and staff, and a clear definition of professional behavior by personnel in all areas of responsibility.** This includes outlining what constitutes harassment or inappropriate behavior and/or management practices with students or with other personnel, and the consequences of such behavior. These may include but are not limited to: • Clear expectations concerning and defining harassment (students and any/all staff). For all staff, definitions of: • Professional conduct in classroom management; • Professional conduct in interactions with other personnel; • Appropriate supervisory role and responsibilities of coaches or caregivers before/after school day; • Appropriate interactions with students and families and professional conduct at extracurricular events.	**5.118: Employee Internet postings and Social Media** **5.502: Complaints Against School Employees** **5.503: Title IX Harassment** **5.610: Staff-Student Relations** **5.611: Ethics** **6.301: Student Rights and Responsibilities** **6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying/Intimidation/Hazing** **6.3041: Student Complaints and Grievances** **6.312: Use of Devices** **6.313: Code of Conduct** ***General Educator Evaluation Instrument*: Environment Domain (Respectful Culture)** **Professionalism Domain (Professional Growth and Learning)**	Partially Met
6. **Clear definition of bullying:** Outlining what constitutes bullying, including cyberbullying, and the consequences for perpetrators.	**6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying/Intimidation/Hazing**	Met
7. **Reporting mechanisms:** A clearly defined process for reporting inappropriate behaviors, abuse, harassment, or bullying incidents that any student or staff member may have observed or experienced. Policy outlines expectations for making reporting accessible to every child and staff member (with complaint managers that represent both genders) and for the intake of these verbal or written reports to be positive, affirming, and focused on accuracy. Further steps outlining the investigation and follow-up process are outlined (addressed in Criterion 23). Mandatory reporting procedures in cases of observed child abuse are further defined and operational in cooperation with law enforcement.	**5.500: Employee Discrimination and Harassment** **5.501: Complaints and Grievances** **5.503: Title IX and Sexual Harassment** **5.611: Ethics** **6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying /Intimidation/Hazing** **6.3041: Title IX and Sexual Harassment** **6.305: Student Concerns, Complaints, and Grievances** **6.409: Reporting Child Abuse**	Partially Met
8. **Positive peer intervention:** Programs to empower students and staff to report, address, and stand up against bullying, abuse, and/or harassment and to support victims.	**6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying/Intimidation/Hazing**	Not Met

II. Harassment, Abuse, and Bullying Prevention (con't)		
9. **Restorative practices:** • **Students**: Approaches to address interpersonal conflicts constructively, focusing on reconciliation and accountability, • **Students/Parents-Personnel**: Conflicts between students/parents and personnel will be handled with parents, counselor, and principal involved. Community liaison may be involved as well. • **Staff-staff**: Community-based complaints handled immediately and resolution is assured.	**6.313: Code of Conduct; all the discrimination/harassment policies** **6.407: Student Social Services**	Not Met

II. Harassment, Abuse, and Bullying Prevention:

5. **Clear definition of harassment and inappropriate behaviors by students and staff**: Several policies touched on this criterion. Embedded in almost all are expectations for what should happen if staff or students witness or are the victim of alleged harassment or sexual harassment and what constitutes such harassment (*6.305, 6.304, 6.3041, 5.500, 5.503*). *Policy 6.3041: Title IX and Sexual Harassment*, does assert that all forms of sexual harassment and discrimination are prohibited, and *Policy 6.301: Rights and Responsibilities*, states that each student has the right to not be discriminated against on the basis of age, sex, race, color, creed, religion, national origin, or disabilities. *Policy 6.304: Student Discrimination/ Harassment*, also addresses bullying and cyberbullying, although the staff policy does not.

Sexual harassment is clearly defined in *Policies 5.503* and *6.3041: Title IX and Sexual Harassment,* and in *5.500* and *6.300: Discrimination/Harassment of Employees or Students*; "harassment" of a general nature is defined, but does not include definitions of discrimination (although noted in the title). These policies also do not include gender as a target for discrimination or harassment (when not sexual in nature).

Policy 6.305: Student Concerns, Complaints and Grievances outlines harassment and complaint reporting procedures, but general harassment on the basis of age, race, color, national origin, or disability is not addressed. This policy is to be posted in every school in an obvious location, but lacks clarity, in defining for students what types of behavior should be reported. The principal is listed as the person who should receive all such complaints; or the "appropriate school district official designated by this policy." This policy only partially meets the criterion because definitions were considered inadequate. The definitions address neither discrimination nor gender, and consequences for violations of the policy are unclear and, in the case of student-student sexual harassment, are left up to the principal alone. Leaving such decisions to a single individual can lead to perceptions of partiality or subjectivity. Reporting mechanisms concerning any complaints of harassment or abuse are addressed in Criterion 7, and general reporting/ information management of any concerns is addressed in Criterion 22.

6. **Clear Definition of Bullying**: Bullying is outlined in *Policy 6.304,* which states that every student is to be "provided a safe learning environment." The definition is general in nature, which could be inclusive of a wide variety of intimidation or threatening tactics. This criterion is considered met.

Despite clear definition of bullying in policy and a process for reporting it, several parents made comments on the online survey related to bullying and its prevalence.

- "Bullying is accepted (even by the teachers to the students) and nothing is done about it."

- "There is no guidance as far as a child who is being bullied."

When asked what needs improvement?; responses included:

- "Bullying. Get the fights under control."

- "The bullying of students."

- "Bullying and how it's not taken seriously or handled in high school."

- "Communication with parents and the No Toleration for bullying needs to be reinstated."

The on-site auditor received no comments concerning a reporting process or about parents' having used such a process, although a few parents mentioned being unwilling to report or complain because they feared repercussions for their child.

7. **Reporting mechanisms**: Since the district does not have written procedures, the reporting process is inconsistent among personnel, subjecting the district to allegations of bias or partiality and potential litigation. *Policy 6.305* notes that student complaints should be submitted via the complaint form to any teacher or the principal. No clear procedures are set forth with phone numbers and names of individuals representing each gender who would receive these complaints, although timelines are designated to ensure prompt response. No formal complaint form was available at the district office when the on-site auditor requested it.

With regard to Title IX/Sexual harassment against students, the principal is designated as the final decision maker for complaints of student on student harassment (sexual). No mention was made of any required training to effectively perform this office, no requirement to involve others to ensure objectivity in the decision-making process, and no clear direction regarding consequences appropriate in such instances. All of this is left to the discretion of the building principal with no monitoring process noted or required. Administrative procedures that would provide this clarity were not found. No "complaint managers" are designated within the district as a whole, representing both genders and available 24/7 for complaints submitted either in writing or orally. *Policies 6.3041* and *5.500* designate the assistant principal as the person charged with investigating allegations of sexual harassment when they involve student on student, and the head principal is tasked with investigating student on staff or staff on staff sexual harassment. In all other reports of harassment or discrimination, the human rights officer is tasked with investigating and managing the complaint. This person is named, and the position identified.

There are no procedures for deciding on the disciplinary actions, consequences, or follow-up with respect to any perpetrator of the harassment, although an appeals process for the alleged perpetrator is outlined. Again, consequences for perpetrators of harassment (if a student) are vague, up to the decision maker, and (in the case of sexual harassment), are left to the principal alone or to the human rights officer (if staff on staff).

Policy 6.409: Reporting Child Abuse outlines a process for reporting suspected abuse, which involves the Security Resource Officer (SRO—the sheriff's office representative at every school), the Coordinator (unclear who this is), and the Department of Children's Services, as required by law. Principals typically oversee the process and involve the SRO immediately, since this is a criminal offense. There are no procedures for this reporting that delineate who the coordinator is at every building or to whom one should report (when unsure) and how.

Complaints or concerns of a general nature by any stakeholder are received by a secretary at the central office. There is again no process or clear procedure for what happens after these complaints are filed, the monitoring follow up, and inclusion of complaints in an employee's personnel file. Having a secretary be a complaint "manager" does not vest the position with any authority and makes monitoring

responses to complaints more challenging. The on-site auditor was told that there is an informal process for communicating complaints to the respective department at central office, but no system for tracking responses and ensuring follow-through. This criterion is only partially met by the policy for sexual harassment.

Parents also commented on a perceived unwillingness by district leaders to follow-up on complaints, as well as an unwillingness by students to report anything.

- "The district needs to listen to concerns and legitimately address them from parents, teachers, and students. Now, they pretend to listen and then there is [no] action made."
- "Student counseling [is needed]. Kids are afraid to speak if someone is doing bad things, so called 'snitching.'"

The full, formal process for reporting complaints or grievances that is outlined in policy is presented in **Exhibit 1.3.** An assistant principal did mention a Text a Tip app that students can use on their phones. This was not noted as an app in use by all schools and SROs, nor was there any documentation regarding its use, but at least at one middle school, it was noted as being a helpful tool to encourage students to report any issues or concerns. These tips go straight to the SROs.

8. **Positive peer intervention:** The on-site auditor found no policy that explicitly focuses on the need to build and create positive peer interactions within schools, aimed at recognizing abuse, discrimination, and bullying, and empowering students to report it.

9. **Restorative practices:** The student conduct policy (*6.313*) touches on positive behavior management and outlines an expected code of conduct by students, including categories of misconduct, but does not specifically address implementation of restorative practices for all stakeholder groups, nor the training required for staff to implement them. *Policy 6.407: Student Social Services* requires the principal to "develop a program of social services which shall include…5). Conflict resolution techniques." The auditor was told that, in practice, building principals decide what type of behavior management system they choose to implement and oversee whatever training is involved. As such, this criterion was not met since procedures are not defined, and neither approaches nor consequences are required to be consistent district-wide.

III. Mental Health and Wellbeing		
Safety Criteria	**Relevant Policies**	**Rating**
Student/Families		
10. **Accessible counseling services, Student/Families:** Readily available mental health professionals on-site or through partnerships with community/SAP organizations.	**6.406: Student Psychological Services** **6.407: Student Social Services**	Not Met
11. **Social-emotional learning (SEL) curriculum:** Programs to teach students coping mechanisms, empathy, and conflict resolution skills.	**6.406: Student Psychological Services** **6.407: Student Social Services**	Not Met
12. **Early intervention strategies:** Identifying students at-risk and providing targeted support.	**6.406: Student Psychological Services** **6.407: Student Social Services**	Not Met
13. **Parent education:** Providing resources and workshops for parents on supporting their children's mental health.	**6.407: Student Social Services**	Not Met

III. Mental Health and Wellbeing (con't)		
Staff		
14. **Accessible counseling services:** Readily available mental health professionals through partnerships with community organizations and Employee Assistance Program (EAP).	None found	Not Met
15. **Professional Development in SEL and trauma-informed practices:** Understanding how to recognize issues in students and support them with active listening, coping strategies, empathy, and conflict resolution skills.	6.313: Code of Conduct	Not Met

III. Mental Health and Wellbeing:

10. **Accessible Counseling Services, Student/Families**: *Policies 6.406* and *6.407* both require that social services and psychological services be provided through a principal-decided program. 6.407: *Student Social Services* states this should be provided "through the cooperative efforts of the principal, teachers, and school counselor." There is nothing required beyond the school day, no affiliation with an external provider although the policy states that the principal is authorized to work with such recognized groups (Family Resource Center, Nurses, Psychologists). *Policy 6.406* only requires the director of schools to develop a program that makes psychological services available to all students.

In practice, various schools across the district have sought support for student counseling and mental therapy needs with outside agencies, but this is inconsistent and almost all principals reported a need for more comprehensive services. Additionally, the auditor found no district-level coordination of these efforts, to assist building principals in securing mental health services for students and their families. This criterion is not met.

Multiple comments were made regarding the severe mental health needs at almost every single school building, from principals, parents, and teachers on the online survey. The following is a sampling of comments from principals:

- "We end up spending more time dealing with trauma and behaviors than with educating. It's coming from outside and beyond our control—not a whole lot about curriculum support because of other mental health issues."

- "Maybe 5-10% of my students are dealing with issues I had no idea about, that I know of, [that are] in mental health crisis themselves or in their family. We had to have one transported today—for suicidal thoughts."

- What needs improvement? "Mental health. It's a big deal, a barrier for us to teach them. Having the services to support them. I have two counselors—they don't have time; I have one two days a week. A lot of time the problem is more than our school—counseling services in the community have a waiting list of a year."

- "There is … a great need for additional school counselors to support students in their learning. It is unreal the number of students who cannot learn due to mental health issues not being addressed and keeping them from focusing. I rarely see my counselor; he always has a list of students requesting to meet with him for various reasons."

Other principals commented on the need for more structured, intentional programming that is proactive.

- What needs to improve? "Enhancing mental health and wellness programs for students and staff."

- "[We need] more mental health options for students."

- "It feels like, at times and in my experience, whatever we have in place is REACTIVE (and not PROACTIVE). Hard to react to a student already in crisis. A shift that can possibly be made is what proactive measures could be in place, what systems and structures can be in place."

The next criterion addresses social emotional learning programming, related to mental health supports.

11. **Social Emotional Learning Curriculum**: No requirement for such a curriculum was found; *6.407: Student Social Services* directs that a social services program should address conflict resolution skills, and programs to support emotional growth are encouraged in *Policy 1.700: District Goals*. However, the criterion is not met. There is no formal program supporting social emotional learning, both in support of students, as well as staff. Comments from principals concerning this need included:

- "We also have more and more students coming to us in need of social/emotional support."

- What needs to improve? "Meeting the social emotional needs of the students (more personnel needed)."

- What needs to improve? "Behavior intervention."

Social emotional learning can serve as a preventative measure for disruptive behavior and is a longer-term solution in many cases.

12. **Early Intervention Strategies**: No policy was found that specifically requires this or directs that early intervention with at-risk students be prioritized. This criterion is not met.

13. **Parent Education**: Only *Policy 6.407* states that social services programming shall address educational information for use by students, parents, and teachers, but does not outline what information, how the information is to be communicated and via what program or vehicle, nor by whom. This criterion is not met.

14. **Accessible counseling services for staff:** Beyond a statement of need, no policy, procedure, or system is in place to ensure that mental health services are available to staff, such as with an Employee Assistance Program (EAP), particularly when a staff member is in crisis. These criteria are not met.

15. **Professional Development in SEL and Trauma-informed Practices**: *Policy 6.313* touches on trauma-informed practices generally, but does not require a district-wide, consistent training program for all staff to understand trauma, abuse, and how to intervene therapeutically. The policy only stipulates that trauma-informed practices for discipline will be utilized, not that training be provided for every staff member on these practices. This criterion is not met.

IV. Positive and Safe School Climate/Environment		
Safety Criteria	**Relevant Policies**	**Rating**
16. **Inclusive and safe school climate and environment:** Promoting respect, tolerance, and acceptance of differences in beliefs, creed, ethnicity, etc., among students and staff. Ensuring students feel physically and emotionally safe at school.	**5.500: Employee Discrimination and Harassment** **5.503: Title IX and Sexual Harassment** **5.610: Staff Student Relations** **6.301: Student Rights and Responsibilities** **6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying/ Intimidation/Hazing** **6.3041: Title IX and Sexual Harassment** **6.313: Code of Conduct**	Partially Met
17. **Student leadership opportunities**: Empowering students to actively participate in decision-making processes.	**None found**	Not Met
18. **Positive reinforcement programs:** Recognizing and rewarding positive behavior.	**6.313: Code of Conduct**	Partially Met
19. **Community engagement**: Building relationships with local organizations and families to support students.	**5.611: Ethics**	Not Met
20. **Ensuring safe, caring teachers and supervisors:** all personnel who work in and around students are trained in appropriate management practices and are background checked for any past criminal behavior. Background checks are performed annually (or more frequently), and clear procedures are in place (for increased monitoring, probation, or termination) for <u>any and all</u> suspicious or undesirable activity flagged in background checks.	**1.700: District Goals** **5.106: Application and Employment** **5.118: Employee Internet Postings and Social Media** **5.119: Background Investigations** **5.600: Staff Rights and Responsibilities** **5.610: Staff Student Relations** **5.611: Ethics** **6.313: Code of Conduct**	Partially Met

IV. Positive and Safe School Climate/Environment:

16. **Inclusive and Safe School Climate and Environment :** *Policy 6.313* requires that all students be provided a safe learning environment at school. *Policy 6.301: Rights and Responsibilities* states that:

1. Have the opportunity for a free education in the most appropriate learning environment;

2. Be secure in his/her person, papers, and effects against unreasonable searches and seizure;

3. Expect that the school will be a safe place;

4. Have an appropriate environment conducive to learning;

5. Not be discriminated against on the basis of age, sex, race, color, creed, religion, national origin or disabilities; 1 and

6. Be fully informed of school rules and regulations.

Policy 5.610 states that staff shall maintain professional relationships with students at all times and develop wholesome and constructive relationships with them; they are also responsible for 1) Creating a positive atmosphere in and out of the classroom; 2) Extending courtesy and respect to students; and 3) Treating all students with consistent fairness. Although other policies listed address safety and maintaining a safe environment for students conducive to learning, no policy specifically requires that

the climate in school buildings be accepting, welcoming, and inclusive of all students. This criterion is partially met.

Several comments were made indicating that the climate in schools was not always positive or inclusive, and that greater care should be taken in hiring teachers who reflect the diversity of the student body. In response to the question, what needs to improve?, principals noted:

- "Expanding diversity in hiring practices."

- "Teachers' diversity in terms of recruitment."

Several parents discussed their concerns regarding questionable and discriminatory speech towards students by peers and by staff members. In response to what needs to improve, one parent said: "Inclusivity, especially because half my kids' friends are racist and use slurs." Parents reported their children do not feel consistently accepted or welcomed.

Several comments made by parents concerned physical safety at school and while waiting for transportation:

- "Safety—my kids have a hard time getting in the bathroom because of all the kids vaping/doing drugs at the HS."

- "Safety. Middle schools and high schools are rampant with drugs (especially high schools). I'm thankful I had SESI as an alternative to William Blount and Heritage. Kids using drugs in stair wells and bathrooms; every day was a new text [from my child] of violence happening."

- "Safety patrol & morning drop off, there are no teachers under the awning at morning drop-off & sometimes no safety patrol."

- "Better transportation for the students. There have been many times over the years that the buses did not run."

Principals confirmed the widespread abuse of substances and the need for better programs discouraging students from use or assisting them in quitting.

17. **Student Leadership Opportunities**: No policy was found that specifically encourages and directs programming that engages students in leadership opportunities and development. This criterion is not met.

18. **Positive Reinforcement Programs:** *Policy 6.313: Code of Conduct* states that staff members have authority to implement disciplinary measures that minimize "disruptions to education with an emphasis on positive behavioral supports and behavioral intervention plans." This is not a clear and specific programming requirement for all schools, so the criterion is only partially met.

19. **Community Engagement**: The policy on ethics states that the district should have positive relations with the community, but no policy directs or requires that there be formal programs for engaging the community in the educational process. This criterion is not met.

20. **Ensuring Safe, Caring Teachers and Supervisors**: *Policy 5.610: Staff-Student Relations* and *Policy 5.611: Ethics* both have clear expectations for appropriate, positive relationships with students. *Policy 5.611* states, "All employees are expected to maintain high standards in their school relationships. These standards include the following:

1. The maintenance of just and courteous professional relationships with student, parent(s), staff members and others...." *Policy 5.610* outlines the following expectations:

   Staff members shall maintain professional relationships with students at all times and develop wholesome and constructive relationships with them. Staff members shall be expected to regard each student as an individual and to accord each student the rights and respect that is due.

   ...[They] shall promote a learning environment that encourages fulfillment of each student's potential in regard to his/her program... by ...

2. Creating a positive atmosphere in and out of the classroom;

3. Extending courtesy and respect to students; and

4. Treating all students with consistent fairness.

   Staff members shall use good judgment in their relationships with students beyond their work responsibilities and/or outside the school setting and shall avoid excessive informal and social involvement with individual students. Any appearance of impropriety shall be avoided. Sexual relationships between employees and students shall be prohibited.

Policy 5.611 states that the "welfare of children [is] the first concern when placing professional personnel, and *Policy 5.600* requires teachers to adhere to the Teacher Code of Ethics and to "be courteous and helpful in interacting and responding to parent(s)/guardian(s), visitors, and members of the public."

Policy 5.106 is clear that no person should be employed who has been guilty of abuse or harassment of any individual or child. Background checks are required in *Policy 5.119*, but these are performed upon hiring and every five years thereafter. Policy does not address any other undesirable behaviors that might prevent or caution district administrators from hiring such individuals, such as DUIs or other offenses (misdemeanors or felonies). Only those infractions that are specific to abuse and neglect of a child or vulnerable person or individuals on certain registries are ineligible for employment. These policies also do not specify what type of background check should be used, national or statewide. Currently, the only background checks the district performs relate to history within the State of Tennessee. Although this is recent technology, performing background checks outside the state is equally important. This criterion is partially met.

One parent commented on undesirable behavior, saying, "Some teachers, I think, shouldn't yell at the children. I seen (sic) one yell at a Kindergartner when going to eat with my son. I thought it was unprofessional."

V. Communication, Reporting, and Information Management Procedures		
Safety Criteria	**Relevant Policies**	**Rating**
21. **Incident reporting system:** Clear guidelines for students, staff, parents, and community members to report any safety concerns. This parallels the system for reporting abuse, discrimination, harassment, and/or bullying of students or staff members. This system is accessible to all, has complaint managers available representing both genders, and is to be focused on positive, affirming, and accurate intake of any concerns or complaints. Reports are to be immediately delegated to the appropriate administrator for investigation and analysis, as outlined in the steps.	**5.500: Employee Discrimination and Harassment** **5.501: Complaints and Grievances** **5.501(2): Complaints Against Staff** **5.503: Title IX and Sexual Harassment** **6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying/ Intimidation/Hazing** **6.3041: Title IX and Sexual Harassment** **6.305: Student Concerns, Complaints, and Grievances**	Not Met
22. **Clear process and a system for tracking complaints and information:** once complaints or concerns of any kind are received, if not criminal in nature, they are to be entered into an electronic management system and then transmitted to the appropriate administrator and office for investigation and analysis. All personnel involved in investigating and analyzing complaints are to follow the steps of investigation/ analysis; response and resolution; and closure and documentation. All relevant data are to be recorded in the electronic management system to ensure accountability, fidelity to procedures, and access to trends and history for any repeated issues or concerns with any individual. This system coordinates information across multiple departments, such as building safety and security, security resource officers, human resources, athletic and extracurricular events and activities, and academic/curricular concerns. Policy directs that data from this system be used to think and work proactively to prevent safety issues or other concerns from happening.	**5.109: Evaluation** **5.114: Personnel Records** **5.119: Background Investigations** **5.200: Separation Procedures**	Not Met

V. Communication, Reporting, and Information Management Procedures (con't)		
23. **Immediate response plan:** Clear protocols are to be developed in connection with the complaint/concern management process, to address safety concerns in a timely manner.	**5.500: Employee Discrimination and Harassment** **5.501: Complaints and Grievances** **5.501(2): Complaints Against Staff** **5.503: Title IX and Sexual Harassment** **6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying/ Intimidation/Hazing** **6.3041: Title IX and Sexual Harassment** **6.305: Student Concerns, Complaints, and Grievances**	Not Met
24. **Transparency with parents and school personnel:** Immediate and regular communication regarding safety issues and actions taken to address them.	**None found**	Not Met
25. **District approved and adopted communication procedures:** Communication between staff and students/families only with approved district platforms during and outside of the school day, and no contact with students or their families via private social media accounts.	**5.118: Employee Internet Postings and Social Media**	Not Met
26. **Accountability:** There is follow up with associated personnel for resolving concerns and/or complaints, as well as follow-up with the complainant to ascertain whether the issue was resolved to their satisfaction.	**5.500: Employee Discrimination and Harassment** **5.501: Complaints and Grievances** **5.501(2): Complaints Against Staff** **5.503: Title IX and Sexual Harassment** **6.304: Student Discrimination/ Harassment and Bullying/ Cyberbullying/ Intimidation/Hazing** **6.3041: Title IX and Sexual Harassment** **6.305: Student Concerns, Complaints, and Grievances**	Not Met

V. Communication, Reporting, and Information Management Procedures:

21. **Incident Reporting System**: All the harassment and complaint policies listed address reporting in some capacity (see **Exhibit 1.3**). With respect to any other general incidents, the process is unclear and not delineated. Abuse or harassment reporting is also not clear and adequate (see also Criterion 6). There are official steps only for harassment/discrimination and for sexual harassment, and although students can report to any adult, parents reported a perception that nothing is done in response to these complaints (see **Finding 2**). These are not treated at the level of official complaints as outlined in **Exhibit 1.3** with investigation. None of the schools have trained complaint managers representing both genders. Reporting by a student can be done to anyone, but a formal district-level complaint form does not exist. There is no coordinated system at the central office for tracking and following up on these reports.

No procedures exist for general concerns or complaints, other than a verbal understanding at central office that a secretary in a supervisor's office should be the main recipient. There are no written procedures for recording and tracking reported complaints, for assuring accountability, and ensuring records are maintained and coordinated (see also Criterion 22). This criterion is not met.

One principal noted, (in response to the question of what is one thing the district could improve): "Allowing time for teachers to voice their concerns and frustrations to supervisors in a confidential setting." Another community member commented on the lack of a documented process for reporting concerns: "Is there a process for how to complain? How to report concerns? [There is] NO PROCESS. Conduct expectations are different by building...If we don't have written policies, don't have procedures [you can do nothing]."

22. **Clear Process and System for Tracking Complaints and Information:** Within *Policy 5.109*, the director of schools is tasked with development procedures, consistent with state law, for processing evaluation grievances. *Policy 5.200* notes that teachers may be placed on administrative leave or may be suspended at any time, if deemed necessary, pending investigation. *Policy 5.114* notes what should be kept in personnel records.

However, no policy requires a system for tracking, managing, and coordinating this information, including data from complaints or concerns, even if found to be insubstantiated. No policy directs that all data and information be housed it in a central, accessible location, such as an electronic searchable database connecting that information to personnel files or to other departments, when applicable.

In practice, personnel files are not electronically managed and are only scanned in as pdfs. There is no centralized database connecting information from complaints, background checks, and/or evaluations and ensuring coordination of that information across departments. Currently, verbal communication is relied upon to "connect the dots." The district has been assiduous in adhering to SHRM criteria for personnel files; however, all information is still hardcopy or scanned in as images and cannot perform the same function as a database in providing historical, related information. This criterion is not met.

23. **Immediate Response Plan**: The only issues that require immediate "response" or that specify any timeline are those dealing with sexual harassment or discrimination/harassment. There is no clarity regarding who, when,or how. This criterion is not met.

24. **Transparency with Parents and School Personnel**: No policy or procedures were found delineating expectations for sharing information with parents and other staff members. No official policy of transparency has been adopted. This criterion is not met.

There were concerns expressed about transparency when certain issues arise. For example, principals, community members, and parents commented on the lack of information received when a building is in lockdown. When parents were asked to name one thing they would improve about the district, responses included:

- "Communication between teachers and parents when an unfortunate event happens between two students or an injury."

- "Communication with parents when there is an issue with their child."

District administrators and principals also commented on the need for improved transparency within the district:

- "[We need to improve] working on internal communications. Making sure our staff is informed." (District Administrator)

- "Any time we send communication [on a threat] out—it only goes out to that school['s families.] The only school that they would send messages out to is the school that has the threat. People expect updates—with ongoing investigations." (Principal)

No policy procedure delineated clear written expectations for transparency or for communication within the district. Additional concerns related to a perceived lack of transparency are addressed in **Finding 2**.

25. **District Approved and Adopted Communication Procedures:** No policy outlines communication procedures, for the district, although *Policy 5.118* outlines expectations concerning employee internet postings and social media use by teachers and employees. *Policy 5.118* states: "Employees shall maintain professional and appropriate relationships with their students and the community. Public postings should remain professional and appropriate for minor students' viewing." This does not apply to private postings; however, when private postings are made available to students or parents, those postings should be treated as public and handled and maintained with appropriate care. Employees are also required to sign a "Fair Use agreement," which states they will not use computers or equipment for any inappropriate activities. These are signed and kept in every employee's personnel file.

The policy further states that any email communications with students shall always originate from the employee's BCS email address and be directed to the student's BCS email address; policy further notes (in all capital letters) that violation of these guidelines may result in disciplinary action or termination. This is the only policy the on-site auditor found that explicitly states that violation of the directives outlined in the policy could result in termination.

The district does not have any policy forbidding teachers from communicating with students via any platform other than that adopted and in use by the district. This policy further states that school email, texting, and Twitter (now X) are all acceptable platforms by which teachers may communicate with students. Postings on the internet that are public or accessible to students and their families (such as a private account to which a student has been granted access) are expected to adhere to all standards of professionalism and district ethics. However, a policy that requires all communication with students to be via district-adopted platforms (for the protection of district employees), so it can be fully monitored by any supervisors, is not in place. This criterion is not met.

The lack of consistency in communication platforms was something parents noted on the online survey as an area needing improvement.

- "The kids don't need to … have 16 different apps of communication. You have single handedly made being a kid so darn complicated it's ruining them."

- "[There are] inconsistent forms of media among teachers on how they communicate with parents about assignments and curriculum. Some use school app, some use email, some use written communication. The teachers should all use the same medium."

Administrators commented on the need to be more conscious about how teachers communicate with students: "There is no acceptable way to communicate on cell phones individually except mass texting—any individual messages [should go] through parents. All district emails and email accounts are public and can be pulled/tracked." (District Administrator)

Another district administrator noted the inadequacy of policy in defining expectations for social media use and teacher conduct: "[Our] social media policy—it needs cleaning up. Technology changes faster than policy (me)—in our climate, realistic, we will do handbooks next year, realistically that will be me. It can be overwhelming. We just keep doing more."

Communication guidelines, in general, were not found in district policy. The need for improved communication throughout the district was a common theme across interviews and in online survey comments. These are addressed more thoroughly in **Finding 2**.

26. **Accountability**: Although the policies on harassment are clear that there should be follow-up, who is to monitor and assure such follow-up is not stipulated, and the procedures and steps in the process for addressing any and all concerns or reports are not clearly spelled out in policy or in administrative procedures, where such steps would typically be found. This criterion was not met.

VI. Ongoing Implementation		
Safety Criteria	**Relevant Policies**	**Rating**
27. **Regular policy review and updates:** Policies should be reviewed and updated periodically to reflect changing needs and best practices.	**1.600: Policy Development and adoption**	Partially Met
28. **Ongoing personnel training:** All staff should receive comprehensive training on district expectations, safety protocols, crisis intervention, and reporting procedures.	**5.118: Employee Internet Postings and Social Media**	Partially Met
29. **Collaboration with law enforcement:** Establish partnerships with local law enforcement to ensure coordinated response to safety concerns and/or illegal/criminal interactions (by a staff member) with children or other staff.	**3.205: Security** **5.611: Ethics**	Met
	Total Met	**2 (7%)**
	Total Partially Met	**9 (31%)**
	Total Not Met	**18 (62%)**
Key: *these criteria were derived from a variety of resources, listed in Appendix B		

As can be seen in the exhibit, policy met two (7%) of the twenty-nine criteria and partially met nine. Eighteen criteria had no policy that outlined expectations for safety related to that category.

VI. Ongoing Implementation

27.   **Regular Policy Review and Updates:** *Policy 1.600* directs the board to review its policy manual for the purpose of passing, revising or deleting policies mandated by changing conditions. There is no additional specificity concerning frequency, timeline, or who is responsible for revising policy for board approval. This criterion was partially met.

28. **Ongoing Personnel Training:** Training is mentioned in policy but not explicitly required, except where required by law. Other things at the discretion of the district are not required, although policy says more training "may" be required. There is no district professional development plan, which specifies topics an which teachers and staff members are to be trained. The district has contracted with an agency that provides Vector training, an online program that covers all topics required by law, such as Child Abuse Reporting, etc. The Human Resources department oversees and ensures that every employee completes this training before they are hired or work with students, with the exception of coaches who are not on staff as certified teachers. This group of about 250 individuals is also expected to complete this training, but it is up to the building principal where they work to ensure it is accomplished. The central office department that oversees it does not have a tracking mechanism for ensuring its completion. This criterion is partially met.

Principals are tasked with selecting and training their building staff in behavior management programs and any social-emotional learning programming. Principals commented on the lack of support at central office for professional development at the schools, stating:

- "Absolutely no financial support is provided for professional development of any kind." (Principal)

- "Professional development funding is not available this year. No money provided to the school this year and limited money in the past few years." (Principal)

District administrators commented about other professional development needed to improve student safety measures. One asked, "What is appropriate? The child advocacy center [does training] on how teachers should NEVER be in a situation that is not interruptible and not observable. [We] need that training."

The human resources office oversees all trainings required by the state for every school district employee. The district contracts with Vector to provide these trainings, which staff access virtually. No employee may be on-boarded for payroll until these trainings are completed. This includes all 1,750 employees that are certified and classified. It does not include extracurricular coaches who are not who are certified or classified. These coaches, representing about 50% of all the coaches in the district, are overseen by the Supervisor of Student Services. Who reported that the principals at each building ensure these individuals complete the mandatory training. Moreover, human resources does not oversee the background checks for these 250 individuals; these are performed by the Supervisor for Student Services, and any results of concern are shared with the Human Resources Supervisor. Coordinated supervision of these individuals is hampered by the fragmented assignment of coaches to a separate department.

29. **Collaboration with Law Enforcement:** *Policy 3.205* states: The Board may enter into collaborative partnerships with appropriate law enforcement agencies. Partnerships may include, but not be limited to, education and recreational programs, delinquency prevention, and mentoring initiatives.
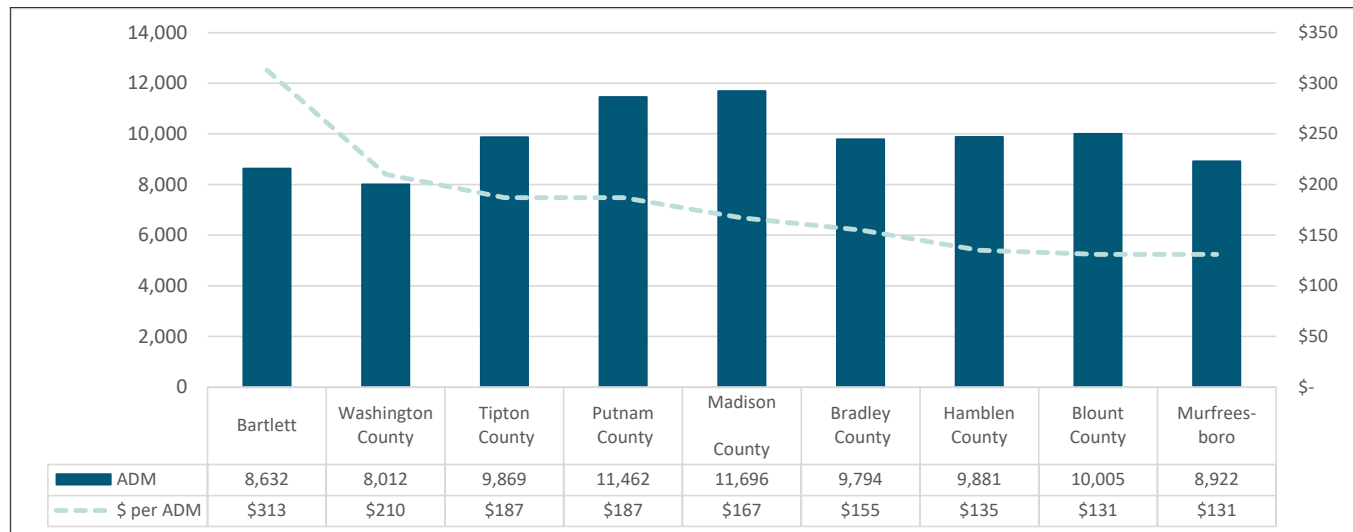
The board may enter into a memorandum of understanding (MOU) with the chief of a law enforcement agency to provide school policing. In practice, such a collaboration indeed exists and is of good standing across the district. This criterion was partially met, although the policy requiring such a collaboration is not direct enough concerning that relationship. In comments, everyone spoke highly of the SROs and their presence in schools. As one principal said, "I think that we've had SROs for close to 20 years—it's a strength that we've had that relationship with the sheriff's department that we've had." All principals cited the benefit of having a representative from the sheriff's office when issues of a possibly criminal nature arise on their campus.

Human Resources Staffing

Blount County Schools enrolls almost 10,000 students across 21 schools in Eastern Tennessee. It is one of the largest districts in the state in terms of student enrollment, in the top 11%, but the district is in the bottom 6% of all Tennessee districts in the amount spent on administrators pay. Blount County budgeted $1.313 million in 2021-22 for administrators, including at central office. With an enrollment of 10,005 during that same year, that represents a total of $131 spent per child to pay administrators' salaries. This amount fell below only six other districts in the state.

The following exhibit shows the amount spent per child on administrators' salaries in 10 school districts with student enrollments within 500 students of Blount County Schools' enrollment.

Exhibit 1.2:   Average Expenditure per Student for District Administrators Compared to Student Enrollment: Comparable Tennessee Districts

	Bartlett	Washington County	Tipton County	Putnam County	Madison County	Bradley County	Hamblen County	Blount County	Murfrees-boro
ADM	8,632	8,012	9,869	11,462	11,696	9,794	9,881	10,005	8,922
$ per ADM	$313	$210	$187	$187	$167	$155	$135	$131	$131

As can be seen in the exhibit, Blount County Schools had an average daily student membership (ADM) of 10,005 in 2021-22. The average per-pupil amount spent on administrators that same year in Blount County was $131.00. By contrast, in districts of similar size, this amount ranged from $131 per student in Blount County and Murfreesboro school districts, to $313 per student in Bartlett County Schools. Washington, Tipton, and Putnam County Schools all ranked 99th, 110th, and 111th, respectively, on administrator expenditures, while Blount County ranked 135th out of 141.

The national average for the number of administrators per 1000 students is 1 administrator for every 560 students, not counting any administrators at schools. These are central office, only. Accordingly, Blount County Schools is lighter-staffed than average. The current number of personnel in the human resources department, serving over 1,750 teachers and classified staff, is 1 supervisor, 2 specialists, and 1 administrative assistant. The department is tasked with the following responsibilities:

1. On-boarding of all employees
2. Background checks
3. Terminations
4. Coordination of benefits
5. Teacher licensure and certification updates
6. Title qualifications for instructional assistants
7. All postings for classified positions

Human Resources Supervisor also is responsible for:

1. Postings for certified positions
2. Maintaining personnel files
3. HR Roadshows to all 21 schools

4. Employee badges

5. Teacher loan forgiveness and mortgage proof

6. Retirement (paperwork and banquet)

7. Teacher discipline paperwork required by the state and submitting all documentation

8. Longevity bonus for retirement

9. Recruitment fairs

10. Student teachers

11. Grow Your Own

12. Teach BCS

13. Spotlight awards for employees (hundreds over a year)

14. Vector trainings (online, required by state)

15. Ethics trainings

16. FMLA, parental leave

17. Collecting payment for health insurance for employees on leave

18. Collaborative conferencing between the board and teacher union

19. All large events for the entire district (Hall of Fame, Teacher of the Year, New Teacher Academy, classified personnel banquet)

In addition to overseeing the responsibilities listed above, the supervisor of human resources also conducts leadership development across the district. This includes the Aspiring Administrator Academy, Classified Leadership Academy (new this year), and New Administrator Academy.

Most importantly, human resources must conduct all investigations into every allegation of abuse, discrimination, or harassment; complete full reports of all information collected; and coordinate with the District Attorney's office if criminal charges are filed in response to an investigation. This office is also charged with ensuring that all employment requirements are met and reported to proper legal entities. The current office does not have a database for personnel files. Personnel files are scanned in as pdfs, but the department is understaffed to move all personnel files to an electronic management system. Such a system is needed to better coordinate all streams of information yielded from background checks; evaluations; parent and student complaints, concerns, or commendations; and any other ancillary information that reflects on a staff member's performance. Investigations alone can last several weeks, although the goal is to collect all information within a two-week time frame. Comments were made regarding the lack of sufficient staff in human resources and at the central office, in general. One principal commented, "There is a misconception that our district is top-heavy. It is simply untrue we need more leadership positions in order to be able to do focused work and support teaching and learning." Another administrator stated, "Given the expectations placed on the Human Resources Department, it is currently woefully understaffed." Another said, The district-level structure at the Central Office is critically understaffed, which creates significant challenges in efficiency and effectiveness."

The usual workload for investigations has increased with the current situation of at least one teacher having been investigated and charged with abuse, and another pleading guilty for misdemeanor charges, related to student touching. This has resulted in additional parent concerns being reported and other

issues requiring additional investigation, as required by law. The current staffing in HR is insufficient to accomplish the work needed.

Procedures for Investigating Complaints of Harassment/Discrimination or Abuse

Although Blount County Schools has no administrative procedures pertaining to reporting harassment or complaints, the auditor nevertheless recorded the steps outlined in policy for investigating and responding to allegations of sexual abuse or harassment. Such procedures are critical to establishing guidelines that hold all stakeholders accountable for ensuring the safety of every child and staff member. The district, as an entity, is required by law to investigate thoroughly and to respond to any potentially harmful situations. Having clear and comprehensive guidelines for investigating and responding to complaints is a step in ensuring and monitoring compliance with that responsibility. Currently, policy recommends the following:

"The school system will act to promptly investigate all complaints, either formal or informal, verbal or written, of harassment because of age, race, color, national origin, or disability; to promptly take appropriate action to protect individuals from further harassment; and if it determines that unlawful harassment occurred, to promptly and appropriately discipline any student, teacher, administrator, or other school personnel who is found to have violated this policy, and/or take other appropriate action reasonably calculated to end the harassment." (*Policies 6.304*, *5.500*)

Exhibit 1.3:   Steps Outlined for Reporting Complaints or Grievances Related to Harassment, Discrimination, or Sexual Harassment

Grievance or Complaint Processes Outlined in Policy		
Policy 6.304: Student Discrimination/Harassment and Bullying/Cyberbullying/Intimidation/Hazing		
Issue/Complaint	**Action Step to be Taken**	**Timeline**
Alleged victims of the above-referenced offenses (harassment described, bullying/cyberbullying) shall report these incidents immediately to a teacher, counselor, or building administrator.	Any allegations shall be fully investigated by a complaint manager (as set forth in **Student Concerns, Complaints, and Grievances 6.305**).	
Teacher, counselor, classified personnel receive a complaint, formal or informal, from a student	The complaint is reported to the building principal, or to the district human rights officer.	Immediately
Principal receives a report of harassment/discrimination/bullying	Principal notifies the human rights officer (actual position or person not named in policy), without screening or investigating.	Immediately
	Principal then reduces the report to written form and sends to the human rights officer.	Within 48 hours of reporting the complaint
Complaint is against the principal	Complaint is made directly to the human rights officer or the director of schools.	

Policy 5.500: Discrimination/Harassment of Employees When the complaint is made by a staff member:		
Issue/Complaint	**Action Step to be Taken**	**Timeline**
Any employee who believes he/she has been the victim of harassment… is encouraged to immediately report the alleged acts to an appropriate school district official designated by this policy. Any teacher, administrator, or other school official who has or receives notice that an employee has or may have been the victim or harassment…is required to immediately report the alleged acts to an appropriate school district official…. Any other person with knowledge or belief that an employee has or may have been the victim of harassment…is encouraged to immediately report the alleged acts….	The Building Principal is the person responsible for receiving oral or written reports of harassment.	
Principal receives a report of harassment	Principal notifies the human rights officer (actual position or person not named in policy), without screening or investigating.	Immediately
	Principal then reduces the report to written form and sends to the human rights officer.	Within 24 hours
Complaint is against the principal	Complaint is to be made directly to the human rights officer or the director of schools.	
If complaint is against the human rights officer	Complaint is to be made directly to the director of schools.	

Policy 6.3041: Title IX and Sexual Harassment (Students); Policy 5.503: Title IX and Sexual Harassment (Employees)		
Issue/Complaint	**Action Step to be Taken**	**Timeline**
Any individual who has knowledge of behaviors that may constitute a violation of this policy shall immediately report such information to the Title IX Coordinator. If the complaint involves the Title IX Coordinator, the report shall be filed with the Director of Schools.	Title IX Coordinator (or Director of Schools) shall: Provide written notice of the allegations, and the grievance process to all known parties to give the respondent time to prepare a response before an initial interview; Inform the parties of the prohibition against making false statements or knowingly submitting false information; Inform the parties that they may have an advisor present during any subsequent meetings; and Offer supportive measures in an equitable manner to both parties.	Promptly
Investigation process		
Policy 6.304: Student Discrimination/Harassment and Bullying/Cyberbullying/Intimidation/Hazing		
Receipt of a report or complaint alleging harassment	Human rights officer shall initiate an investigation.	Within 48 hours of receipt of the report
Investigation conducted	Personal interviews with complainant, with the individual against whom the complaint was filed, and others who have knowledge of the alleged incident, and/or related documents	Within 20 calendar days from receipt of the initial report
Human Rights Officer shall complete a written report summarizing findings of the investigation.	Submitted to the director of schools	Within 20 calendar days from receipt of the initial report
Policy 5.500: Discrimination/Harassment of Employees		
Receipt of a report or complaint alleging harassment	Human rights officer shall initiate an investigation.	Immediately
Investigation conducted	Personal interviews with complainant, with the individual against whom the complaint was filed, and others who have knowledge of the alleged incident, or related documents	Within 14 calendar days from receipt of the initial report
School District Human Rights officer shall complete a written report summarizing findings of the investigation (whether allegations are indeed substantiated).	Submitted to the director of schools	Within 14 calendar days from receipt of the initial report

Policy 6.3041: Title IX and Sexual Harassment (Students); Policy 5.503: Title IX and Sexual Harassment (Employees)		
Issue/Complaint	**Action Step to be Taken**	**Timeline**
For complaints of student on student harassment, an assistant principal shall serve as the investigator…. For complaints of student or employee on employee harassment, a head principal shall serve as the investigator. …and [both are] be responsible for investigating complaints in an equitable manner that involves an objective evaluation of all relevant evidence.	Investigator shall initiate an investigation.	Within 48 hours of receiving the complaint
All investigations shall:	Provide both parties an equal opportunity to inspect and review any evidence related to the allegations in the formal complaint; Result in the creation of an investigative report that fairly summarizes relevant evidence.	Prior to the completion of the investigative report
The investigator shall (in relation to the investigative report that summarizes relevant evidence):	Send to each party the evidence subject to inspection and review. All parties shall have at least 10 days to submit a written response which shall be taken into consideration in creating the final report.	Prior to the completion of the investigative report
	All investigations shall be completed.	Within 20 calendar days from the receipt of the initial complaint
At close of the investigation	Investigator shall deliver a final written report to the parents/guardian of the complainant OR complainant (employee), parent(s)/guardian(s) of the respondent OR respondent, and to the Director of Schools.	Within 20 days from the receipt of the initial complaint

School District Action		
Policies 5.500 and 6.305		
Issue/Complaint	**Action Step to be Taken**	**Timeline**
Upon receipt of a report that a violation has occurred	The school district will take prompt, appropriate formal or informal action to address, and, where appropriate, remediate the violation.	"prompt"
Determining what the appropriate response is	The school district shall consider: what response is most likely to end any ongoing harassment; whether a particular response is likely to deter similar future conduct by the harasser or others; the amount and kind of harm suffered by the victim of the harassment; the identity of the party who engaged in the harassing conduct; or whether the harassment was engaged in by school personnel, and if so, the school district will also consider how it can best remediate the effects of the harassment.	Not specified, other than promptly
Policies 6.3041 and Policy 5.503		
At the conclusion of the grievance process	A determination is made of responsibility of the respondent by the decision maker; with students, decision maker is the head principal. With employees, the decision maker is the supervisor of HR.	
Decision maker receives report	Allows either party to submit written questions he/she wants asked of any party or witness prior to the determining responsibility.	Not specified
Decision maker makes a determination regarding responsibility	Provides the written determination to the parties simultaneously along with information about how to file an appeal.	Not specified
Title IX Coordinator (Role and Person specified in policy)	Determines, based on determination of responsibility, whether any other actions are necessary to prevent reoccurrence of the harassment.	

In most cases, policy specifies a timeline for the investigation and report submission. However, although policy allows latitude in deciding on the appropriate actions in follow up to the investigation and resulting conclusions, no suggested consequences are outlined as examples, nor does policy specify a timeline for when action must be taken in response to the report, nor when termination is appropriate. There is no clear guidance for how the district is ensuring a complainant will be ensured a safe and harm-free environment, since much of the decision making is left to individual school leaders. *Policies 5.200* and *5.201* outline the separation practices for tenured and non-tenured teachers, and *Policy 5.202* outlines separation practices for non-certified personnel. These policies note when and for how long teachers or non-certified personnel may be suspended (without pay), or placed on administrative leave, and describe the process for a suspension of longer than three days or for dismissal, when warranted. For

tenured teachers, the policy only says that charges shall be made in writing "that may justify dismissal or suspension greater than three (3) days," but in the case of non-tenured teachers, policy states that they may be dismissed during the contract year for incompetence, inefficiency, insubordination, improper conduct, or neglect of duty after giving the non-tenured teacher due notice of the charges in writing.

The dismissal process for tenured teachers in all cases allows them to request a hearing by an impartial hearing officer regarding their dismissal. The hearing officer has complete authority over the hearing process and submits a ruling regarding the dismissal and whether the charges are sufficient. Once the hearing officer submits his written findings and conclusions, either party may appeal an adverse ruling to the board. The board then becomes the final arbiter, but no new evidence may be submitted by either party.

Policy is clear that dismissing personnel is possible, but in the case of tenured teachers, the process is far more involved. It is not impossible, but difficult without sufficient evidence of inappropriate behaviors that are clearly unacceptable, noted so in policy. Currently, the district lacks policy that specifies certain behaviors as unacceptable. For example, teachers are not required to communicate via district-approved and monitored forms of communication; they are allowed to text students directly with personal cell phones or with a Twitter (X) account. Neither teachers nor personnel have any clear consequences if background checks reveal any prior incident, such as a charge for Driving Under the Influence or possession of an illegal substance. In such instances, what happens with that information is entirely up to the HR office; this office has asked for guidance in these situations, but neither policy nor procedures have been proposed. Policy does not specify any guidelines regarding consequences for teachers or non-certified personnel when there is evidence of harassment or wrongdoing, or suggest courses of action appropriate for certain scenarios. In some cases, the on-site auditor learned that when the complainant is a young child, parents will not allow their child to serve as a witness with the hearing officer, since their testimony could be required at a later date, such as with the Chancery court. In these instances, policy does not consider the age or vulnerability of the complainant when outlining the process for documenting charges against a teacher that are sufficient for dismissal. Without video surveillance that can serve as evidence in lieu of personal testimony, charges are sometimes dropped.

In the cases reviewed by the auditors, district leaders adhered to the state's required processes of investigation. Background checks on all teachers were performed as required, but without clear policy specifying steps to take in handling issues that are not deemed by the state inexcusable offenses, district leaders have insufficient direction for what to do. Additionally, background checks are only required every five years and reveal information limited to the State of Tennessee. More frequent background checks that extend to national databases would assist leaders in identifying potential predators, and increased video surveillance, especially in elementary schools, would assist in assuring that all are safe and under supervision by more than just one adult. The "letter" of the law protects all individuals equally, but the additional protection of tenure requires even more documentation and evidence that are irrefutable.

Security officers and administrators emphasized how important this is, sharing their frustration over inadequacies in surveillance:

- "Obviously, the more cameras you have the better. That's physical contact. Then you have virtual contact." (Security Officer)

- "[There are] no cameras in every classroom. [It's] a logistical nightmare—hallways [where we need them most]; and in the gym. [We need them] in the lunchroom, perimeter, front entryway." (District Administrator)

- "You are never going to go wrong with having more cameras—ever." (Security Officer)

Others mentioned the need to be persistent and accurate during the investigation process. The District Attorney's office representative stated, "We must keep documenting and reporting in writing—what happened. With names, times, dates. Those small details, who saw WHAT. Communication is key— Cover your bases. Overcommunicate, and make sure everyone is on the same page." The Security Resource Officer representative said, "Everyone [should be] putting it in black and white. That sets the bar—if you step on things you shouldn't too many times, you are a liability and you're out. For us, it's a totality of the circumstances. To me, it should be easier to fire somebody [in this district]." Administrators in central office expressed frustration at not being able to inform the community of any details during an investigation, because confidentiality due to the criminal nature of the charges and the need to eventually go to trial. Their comments included:

- "How do you balance transparency with privacy and the laws that are in place and the policies with that? It's very difficult to be transparent—how do you balance that? Room and area for transparency would be on the proactive side—here's what we do in the event."

- "When we are investigating, we can't share that investigation. What we have done is try to inform, as soon as charges happen, 'Hey, this person has been charged today.' We can't reveal anything until the indictment comes."

When principals were asked about the discipline process, all mentioned the disciplinary action flowchart provided by Human Resources. This is a clear process for any employee not fulfilling the responsibilities of their position. However, when it involves something not academic, principals noted the process for dismissal or corrective action is not clear, a further indication of the need for clear procedures. Comments included:

- "Going through all the steps and coming up with a plan of corrective action. If it's a teacher's performance, academically—policy is pretty clear. There is a progressive discipline flowchart— [that is] not board policy. Adhering to that—if it's academic, [the process] is clear." (Principal)

- "People, staffing—hard to address the issues, not just within this scope, every department is understaffed. It's hard to navigate with so few people." (Principal)

- "The ones (teachers) on the fence…those are the hardest to do. where you have a teacher that's just not very good, …when [is it] grounds for dismissal? How [do we] say this is bad enough that we're going to ask for dismissal? Those are the tougher ones to make a decision on. Then you throw in there that we are understaffed. It becomes very difficult." (District Administrator)

Overall, Blount County Schools is a tightly-knit community with a small-town feel. However, such familiarity can lead to a false sense of security, as the community has discovered. In reviewing policies and procedures for ensuring safety and following up on complaints and grievances, auditors found that written direction for proactively ensuring the safe and positive treatment of students is inadequate. There is no system that ensures follow-through on any issue of concern, nor any clarity for how to act when complaints are verified. Current procedures are vague and left up to the sole discretion of the principal or human rights officer, which may contribute to perceptions of bias in deciding fault or consequences. The district has not defined those behaviors considered unacceptable beyond what is included in child abuse; only one policy is noted as explicitly stating the possible consequence of termination if it is violated— *Policy 5.118: Employee Internet Postings and Social Media*.

Greater specificity in policy is needed, as well as thorough administrative procedures for addressing concerns; encouraging reporting by students, staff, and parents; establishing a process for follow up on concerns, and assuring all stakeholders that mistreatment of students and staff will not be tolerated, and to ensure that district leaders have done all within their scope of authority to fulfill their obligations to protect children.

> **Finding 2: Members of the school community have expressed concern that leadership is not transparent in communicating personnel and safety issues in a timely and forthright manner, eroding trust and promoting concern that student safety is not driving decision-making.**

The most effective public schools are those that adopt a policy of full transparency in all decision making and in setting priorities. Public school administrators must hold the highest standards of ethics in all actions. Any action perceived to be deceptive or aimed at covering up or hiding the truth negatively impacts trust in the community. If the public perceives that it cannot trust its school leaders, how can these same leaders be entrusted with the community's children, let alone their tax dollars?

An on-site auditor visited the school district to determine whether district leaders had acted according to policy and law in addressing the concerns and complaints concerning a few certified staff who are no longer employed in Blount County Schools. These individuals, however, were under investigation for harassment or inappropriate interactions with students, and in a few cases, had been employed by the district for more than 10 years. The auditor also interviewed administrators and focus groups of principals, as well as board members, council members, and county representatives. Overall, the auditors concluded that although district leaders had followed the legally-established process for investigating complaints related to these individuals, and although background checks were performed every five years, the perception in the community is that Blount County Schools' leaders are not transparent and do not make decisions in the best interest of children.

Regarding student safety, board policy and goals are clear that student safety is a top priority. Several policies address staff conduct with respect to students. These have been summarized in **Exhibit 1.1**, specifically in the discussions of criteria 5, 6, 16, 20, and 25.

Despite these policies concerning staff conduct and a written commitment to student safety, members of every stakeholder group are concerned about student safety. The arrests of teachers for abuse has shaken the community and resulted in perceptions of a lack of transparency and loss of trust in the system.

Board member comments on the lack of trust and parents' unwillingness to reach out to the board included:

- "Parents want to know that they are protected and know that they are safe. We've lost a lot of kids to private schools and city schools—there's a loss of trust, there. We have to do a better job vetting people—especially coaches."

- "If there is an issue or something [parents] will reach out to other people." [Why are they not reaching out?] "Maybe with past administrators, maybe they didn't feel like they were heard."

Others board members expressed frustration in not knowing or trusting the system for screening employees' backgrounds:

- "What's the procedure—the policy on background checks? Checks for criminal charges? Records? Terminated for drug problems? [A] 2016 Heritage High School teacher accused of assaulting a

student and [was] reinstated the next year. The community is pretty infuriated—they have strong expectations." (Board Member)

- "We are going to have to make sure our policy reflects state law and make sure that all schools abide by it. [There are] too many teachers/employees that have been questionable." (Board Member)

- "We have to do a better job vetting people—especially coaches." (Board Member)

Some parents shared concerns related to the current situation and climate in the system, and the safety of their children:

- "My daughter has specifically complained about teachers saying things that have made her uncomfortable, and it's been looked over. Then you see on the news that these teachers and coaches are in jail for inappropriate conduct with children. You should probably take these complaints more seriously and do something ahead of time to protect our kids. If I had any other option my kids would not remain in public schools. My two youngest have never attended public school because of stuff like this."

- "If there are ever any complaints that a child has been harmed by a staff member then there should be a full investigation, and said staff member should not be allowed to work with children again, certainly not within the same district."

- "Stop employing pedophiles and fire them on the 1st incident not the 100th."

- "BCS needs to understand the definition of a pedophile. And how it compares to a simple disciplinary issue regarding a child. BCS will secure the job of a PEDOPHILE to protect said pedophile's family who also worked on the school board. BCS would rather transfer a pedophile school to school, hiding accusations, and putting more innocent children in harm's ways of being abused, than fire someone and legally stand up for our kids. BCS will, in fact, fire a teacher of 30+ years though with a clean personnel file over a SINGLE disciplinary issue regarding a student. That is BCS, and that is how you all work."

Others noted changes that need to be made in the district:

- "The principal is ultimately responsible [for supervising coaches]—close to 200 coaches. They are not monitored. All athletics are after school—and they travel! Students do stupid things." (Board Member)

- "Holding teachers and administrators accountable [has to improve]. Fire teachers and administrators when they do not do their job. Do not hire because of who their daddy was." (Parent)

When asked about things that need to improve in the district, dozens of parents and staff members commented on the need for improved transparency, community engagement, and communication. There is a strong perception that the district is hiding information, hiding budget data and spending information, and not being upfront with the community. This perception is shared in county government offices, as well.

Comments concerning the need for more transparency and greater community engagement included:

What needs to improve?

- "Being more transparent to the public as far as the budget and other items. Whether it's good or bad. I also think they should take up for the schools more instead of sitting back and letting things go." (Principal)

- "Clearer transparency/communication ." (Principal)

- "School board meetings at 5:30 and during school hours—that is not showing transparency and good faith—parents can't get to these meetings." (Community Member)

- "Communication and transparency with stakeholders." (Principal)

- "We always need to improve in funding, but we also could improve in transparency and use of data as a district." (Principal)

- "Transparency." (Principal)

Comments related to perceptions of mismanagement or mistrust included:

- "They wanted to borrow 100m dollars. We were already owed 250m, of which 95% was schools, and they couldn't tell me what they did with it." (County Office)

- "Several decisions and conversations I've had with central office personnel leave me feeling "icky," as if I'm not sure the decisions being made are completely ethical." (Principal)

- "[I get calls], 'Did you know about this? What do you think about this?' [This situation] does affect the trust of the community." (Community Member)

- "Budget—one of the things is trust. What are you really doing with the money?" (Community Member)

- "I was concerned that there was an almost adversarial relationship between the director's office and the mayor. There doesn't seem to be a good working relationship there—there's no trust." (Board Member)

- "We find the money and give it to them, and the kids never see it. They don't give it to the kids. I know…that we gave $3.5 million to fix a roof on the building, and I'm over there and the roof is leaking. They have a history of mismanaging the money." (County Office)

- "It's become a good ol' boy system, and not about the kids. Our kids have really suffered in this." (County Office)

Others noted the changes that are needed to improve trust and climate:

- "There need to be answers given—they need to be assured there is safety." (Community Member)

- "We need to do these things to be involved—[to build] trust, transparency, communication. School board members, commissioners, parents." (Board Member)

- "Community Involvement: While our schools are doing great work, there is room for growth in fostering stronger community engagement, particularly in building a more unified connection across all schools within the district. By strengthening collaboration and involvement at all levels, we can create a more cohesive and supportive district community." (Principal).

The current lack of trust in the community and across the district is also affected by the current function of the communications department. In BCS, the communications director is tasked with promoting positive events and occurrences across the district, not in communicating about critical issues with parents. Stakeholders shared concerns regarding how well this department is communicating important information to the community:

- "The communications team [is] clearly done by folks without communications degrees." (Principal)

- "You can plainly see there's no communication department, no liaison for the community because there is nobody doing it." (Community Member)

- "Our typical statements we release are not going to be good enough either. We are going to have to earn the mistake back." (Community Member)

Trust is further impeded when alignment and consistency across the system are inadequate. The auditors noted a need for improved clarity and specificity in policies and procedures surrounding teacher conduct, complaints, and managing information (see Finding 1). In addition to these issues, there is a perception among principals that consistency, coordination, and support at central office are insufficient. This includes the clarity of roles and responsibilities, the structure, and communication and support.

Sample comments from principals in response to the question, What needs improvement?, included:

- "Central office structure clarity who is responsible for what?" (Principal)

- "Communication and support from the central level." (Principal)

- "Increased understanding between school levels and Central Office. Improved resource hubs for schools." (Principal)

Additional comments regarding communication and a lack of consistency, both at central office and at buildings, included:

- "Communication from the district level to the school level is poor; there is no unified message, and important information is often not relayed in timely manner or to the relevant people. There is little transparency." (Principal)

- "At times … there appears to be a lack of communication between departments as there are things missing or overlapping between C&I and spec. ed. for example. Additionally, these teams working more collaboratively to support our teachers would be ideal." (Principal)

- "Policy isn't followed by everyone. Some follow and some don't. It depends on who you are if you have to follow it or not." (Principal)

- "When there is an issue, I feel like I sometimes get the runaround. One district supervisor will tell me to call another, and when I do so, they tell me to call the person I spoke with first. Several things have fallen through the cracks; RTI and ILP-Ds, in particular." (Principal)

- "Weakness is in the leadership positions in CO. [There's] no follow-up sometimes, I like the people—[it's] usually the leadership. An organization follows the shadow of the leader." (Community Member)

- "The various departments at the Central Office are often disconnected from each other, as well as from site-level operations throughout the district." (Principal)

Blount County Schools has suffered a loss of community trust. While many parents are justifiably concerned for their children, others nevertheless communicated their unwavering support for the teachers in their schools and for the district, as a whole. Despite the negative occurrences in the district, the community is still willing to support the mission, vision, and goals of the district, if there is a real and noticeable change in how district leaders conduct themselves and the business of the district. The community desires to see a shift in the relationship between district leaders and the community they serve and a servant-leader mindset from all at central office, with full transparency in every aspect of district management. This includes making personnel decisions that show parents student safety is indeed the top priority, beginning with clear and specific expectations in policy, robust administrative procedures, staffing to ensure accountability, and a collaborative, non-adversarial relationship between district leadership and county government.

Recommendations

Based on the streams of data derived from interviews, documents, and online surveys, the CMSi auditors have developed a recommendation and set of actions to address its findings.

The findings have been triangulated, i.e., multiple sources of data serve to support the auditors' conclusions. The recommendations in this section are representative of the auditors' best professional judgments regarding how to address the problems that surfaced in the audit.

The recommendations are presented in the order of their criticality for initiating system-wide improvements. The recommendations also recognize and differentiate between the policy and monitoring responsibilities of the board of education and the operational and administrative duties of the director of schools.

Where the CMSi audit team views a problem as wholly or partly a policy and monitoring matter, the recommendations are formulated for the board. Where the problem is distinctly an operational or administrative matter, the recommendations are directed to the director of schools as the chief executive officer of the school system. In many cases, the CMSi audit team directs recommendations to both the board and the director, because it is clear that policy and operations are related, and both entities are involved in a proposed change. In some cases, there are no recommendations to the director of schools when only policy is involved or none to the board when the recommendations deal only with administration.

Audit recommendations are presented as follows: The overarching goals for the board and/or the director of schools, followed by the specific objectives to carry out the overarching goals. The latter are designated "Governance Functions" and "Administrative Functions," respectively.

> **Recommendation:** Develop policy and procedures that clarify expectations for personnel conduct, building climate and environment, and personnel management practices. Establish clear communication protocols to improve transparency and accountability in the system, and increase staffing to implement an electronic information management system for personnel records, performance data, and all district complaints.

Managing and supporting personnel in a large district is challenging under the best of circumstances. When unfortunate events occur that put the district in crisis, having weaknesses in policy and procedures becomes a liability. Successful districts operate within a context that balances those decisions that are made at the district level, in collaboration with a broad representation of stakeholders, that must be consistent for all, with those decisions that must be left under the discretion of building leaders. This balance represents how effective districts manage to stay consistent, aligned, and unified without requiring lock-step uniformity. Such uniformity may, in fact, undermine effectiveness, since no two students are exactly alike and schools need flexibility to respond to their needs effectively.

This balance, however, only functions when the expectations, goals, mission, vision of the system are clearly defined and delineated in policy and procedures. When policy and procedures lack this specificity, decisions are left up to the sole discretion of building leaders and teachers, who, inadvertently, may not know if the decisions they make day to day are aligned with district guidelines, particularly if those guidelines are not spelled out. Developing procedures and revising policy are time consuming tasks that are essential to effectiveness and efficiency. They give clarity and security when building leaders are presented with novel problems that are outside the scope of the letter of the law. They also save

time, since personnel are not relying on a phone call to get clarity on what to do in these situations. It's even more critical to have this guidance in writing when building leaders are new to the system or inexperienced. The absence of clear written direction for follow-up and accountability in investigations leaves administrators and the board vulnerable to civic or criminal litigation.

The ideal balance between decisions that the Curriculum Audit Center model recommends is presented in the exhibit below. This exhibit displays those decisions that should be clarified at the district level, and are common for all. The list on the right are areas where schools need latitude, but not absolute latitude. Schools can make decisions in those areas as long as they still align to the expectations, goals, and guidelines on the left.

Exhibit R.1:   Decision Making Matrix: Tightly-Held and Loosely-Held

Tightly-held (CONSISTENT) (Non-negotiable) *District Level*	Loosely-held (FLEXIBLE) (Aligned to the Tightly-held but Negotiable by School) *School/Classroom Level*
Ends (System priorities, vision, beliefs, goals, curriculum, assessments)	**Means** (How [*and when**] programming is delivered, in response to student needs at individual schools)
• Vision, Mission (district, program-specific); Priorities (district, program) • Goals (district goals, program goals) • Philosophy, Beliefs about education (district) • Policy, Procedures that are required • Standards, objectives for students • Curriculum—Outcomes/Student Expectations/ Objectives • Assessment—aligned to curriculum, criterion-based, benchmark, formative, and diagnostic (progress-monitoring, skill checks, performance-based)	• Differentiation of when students (individual and groups) get which standards/outcomes/student expectations/objectives • Processes, procedures • Instructional strategies • Resources, textbooks, etc. • Program implementation • Groupings • Staffing • Classroom-based assessment (when and with whom, not necessarily which instrument)
Note: *Flexibility in pacing does not mean not adhering to grade-level standards and objectives. Rather, it means allowing teachers a level of daily or even weekly flexibility in when students move through the desired learning progression, so they can scaffold and move students at an appropriate (and on-level) pace. Not all students learn at equal rates so a level of flexibility is required, for enriching, accelerating, providing additional practice, or re-teaching	
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The on-site auditor was told operation of Blount County Schools is a blend of site-based management with central office oversight. In practice, many decisions are left to the schools with little guidance in policy. Although several policies mention the need for administrative procedures to clarify expectations, the district has not developed such procedures. A few documents provided by other departments clarify processes, such as the discipline flowchart provided to principals by the human resources department, but there are no centralized administrative procedures (see **Finding 1**). Policy is inadequate in clarifying expectations and priorities for student physical and emotional safety, as well as the safety of personnel. Staffing in human resources is not sufficient to effect a transition to a virtual system to manage personnel information (see **Finding 1**), and clarity on processes and procedures is provided verbally, which has resulted in communication gaps (see **Finding 2**). The official communications department is only staffed part-time and is not tasked with liaising with the community to receive concerns or complaints and respond accordingly (see **Finding 2**). A perception in the community is that the district has not been

transparent in communicating about personnel issues and financial practices. Some believe that parent concerns are not validated and followed up on, and that students are not safe. While others feel that the district is doing a wonderful job at certain schools, the negative perceptions have overshadowed the positive impact many teachers and schools are having on the children they serve (see **Finding 2**).

Governance Functions: The following actions are recommended to the Blount County Schools Board of Education:

G.1: Revise policy to fully meet criteria listed in **Exhibit 1.1**. Require the director of schools to develop procedures for how to implement these policies where noted. Suggested policy revisions include:

I. Physical Security: Policy is needed concerning security measures that should be required at every building by a certain date. These should include:

    a. entry vestibules with strike latches, perimeter fencing, locks on classroom doors, and intercom/ telephone systems in every classroom;

    b. surveillance cameras that are minimal for every building and their location;

    c. emergency drills in dealing with unwanted/dangerous intruders; and

    d. inspections that address safety and security as well as regular maintenance items.

II. Harassment, Abuse, and Bullying Prevention: Policy needs to be revised to expand definitions of harassment and discrimination to include gender, and to ensure that the reporting process is improved by increasing accessibility and security of the complaint/concern process. Some suggestions include:

    a. "Advertising" how to share/report and implementing curriculum/training on recognizing and addressing bullying, harassment, and other forms of inappropriate interpersonal relations between students or students-staff; require this same training of all personnel, to improve their recognition of harassment/bullying and intervention when it arises.

    b. Having clear procedures for reporting any and every complaint by any stakeholder in the district and making reporting safer/more secure and private by requiring trained complaint managers of both genders at every building.

    c. Having a consistent complaint form across the district and requiring all personnel to submit the form immediately, without question, to the next person in the reporting chain.

    d. Strengthening the ethics policy and including more specific requirements for teacher conduct with respect to students and their families; make corresponding changes to the staff-student relations policy.

    e. Revising the expectations for social media and limiting teachers to communicating with students via school email or a district-adopted messaging app that is monitored centrally.

    f. Improving the code of conduct policy by requiring consistent Positive Behavior and Instructional Support (with a focus on restorative practices) to be used across the district; train all personnel (regardless of their position) in implementing this approach.

    g. Requiring increased training, particularly for school administrators and for complaint managers, to satisfy all requirements above.

III. Mental Health and Wellbeing:

a. Develop policy that requires assistance programs for students and their families and all personnel in conjunction with their health insurance benefit package. The focus of an assistance program is to provide mental health support services to those who need help, and ensure these services have immediate openings.

b. Revise policy on social services and psychological services to require minimum FTE for counselors in every building, based on their size and need. Ensure that <u>access</u> to these supports is equal—a building with 500 students needs more counselors than a building with 100. Include in policy the requirement for all principals, assistant principals, and teachers to have training in basic therapeutic approaches, such as active listening and de-escalation practices, as well as trainings on trauma-informed practices.

c. In the Social/Psychological Services policies, define expectations for the staffing of school counselors (number of students per counselor), and require the director of schools to ensure that their job descriptions and skillsets are primarily focused not on scheduling but on mental health support and social emotional learning, especially at the secondary level.

d. Require a social-emotional learning curriculum to be integrated into the regular curriculum to improve emotional intelligence.

e. Require the director of schools to develop procedures for a full-scale adoption and implementation of these mental health supports. Use survey instruments with students, parents, and teachers to gauge their effectiveness.

f. Adopt social emotional learning goals and integrate these expectations into the regular curriculum, with the ultimate goal that teachers deliver this material to students, practice and model it in the classroom, and improve the emotional intelligence of children so they develop strategies for processing their feelings appropriately and in respectful, harmonious ways. Provide in-classroom training and coaching for teachers in this process.

g. Require an information tracking system for every child to note risk factors to facilitate early intervention and supports for students and their families. Require procedures that outline how to manage and use this system.

IV. Positive and Safe School Climate/Environment:

a. Expand and revise the code of conduct policy to address students' feelings of welcome and belonging, as well as their physical and emotional safety. Prioritize positive behavior reinforcements.

b. Develop policy that aims to establish connections with the community while also developing student leadership skills, such as school-to-work programs, business internships, or service learning/volunteer opportunities that students can use to satisfy curricular requirements.

c. Likewise, in the same policy, note the intent to invite businesses and organizations from the community to visit schools and share their work, mission, or ministry with students to create an authentic backdrop for the content they are learning.

d. Modify policy that addresses mental health supports to include climate surveys by students; require building improvement plans to address any concerns that arise from these climate surveys.

e. In policy, require regular climate assessments and the use of these data to guide professional development and improvement planning in schools. Direct policies for managing this feedback process.

f. Develop guidelines and procedures for responding to background check information, when offenses are revealed that do not automatically preclude an individual from working in the district (such as DUIs, etc.). Specify proper responses to these situations. Require background checks for all personnel annually, and include data from outside the state as well as the State of Tennessee. Implement a background check system that can provide out-of-state data on an as-needed basis.

V. **Communication, Reporting, and Information Management:**

a. Develop and adopt policy for managing the reporting, investigation, and follow-up process for any and all complaints, not just those specific to harassment. In policy, stipulate timelines for responses—those that should be immediate, prompt, and the steps in the response process. Require procedures for how the complaint reporting and response process should function at every level. In policy, also require that all persons involved in deciding consequences for offenses be unbiased and work in collaboration with a committee to make these decisions.

b. Require an online system for managing this process, and specify that these data be linked to personnel files.

c. Specify the purposes and role of the communications department, and allocate resources to support its staffing. Prioritize transparency with all stakeholders in performing the communications/liaison function.

d. Require that procedures be developed that minimally direct the process for receiving, investigating, doing follow-up, and resolving complaints of any kind, through the office of the community liaison (see **A.5**).

e. Communications policy should be revised to direct the addition of a community liaison position with administrative authority who also coordinates all communication within and outside the district (see **A.5**). This person should be tasked with receiving and following up on any complaints from parents, students, or community members that are outside of the complaint managers at the building level or that come into the central office.

f. Policy should require an information management system that is online, searchable, and that can coordinate information across multiple departments. This system must primarily function within the scope of the human resources department, since it touches on employee job performance and training.

VI. **Ongoing Implementation:**

a. Develop a cycle for reviewing and revising policy that ensures all policies are reviewed every five years, and new policies can be introduced at any time.

b. Establish in policy the expectation that professional development is a critical component in developing the capacity of every staff member in the district to perform their role most effectively, and in a manner that aligns with the district vision, mission, philosophy, and goals. Require in policy a plan for professional development to accomplish all the necessary steps outlined in this recommendation, and in conjunction with the steps recommended in the Curriculum Audit.

c. Strengthen the policy on the collaborative relationship with the security resource officers to require such a relationship, and clarify their role and how it dovetails with the role of building leaders. Require procedures to note how, when, and to what extent the SROs should be brought into the decision-making processes at buildings, particularly for proactive measures as well as reactive.

d. In policy, note the proper function of the central office in supporting the work and responsibilities of schools and school leaders. Central office administrators are in a staff role; they exist to support the work of the line, or the teachers and leaders at schools. Their primary responsibility is support and service; as such, input from buildings regarding what services and supports they need is critical to assuring district improvement, so establishing a feedback process should be prioritized.

G.2: Adopt policy concerning the expectations for the ongoing, positive, and collaborative nature of the relationship between district administration and county government officials. Include these expectations in the job description and evaluation of the director of schools.

G.3: Allocate the resources needed to support staffing increases at central office, or to move staff around for the more efficient use of human resources. Implement the recommended steps of the Curriculum Audit to improve the organizational structure and clarify roles and responsibilities at central office. Specifically, consider the creation of a full-time administrative communications/community liaison role, so follow-through on complaints and concerns has the immediate attention and authority it requires. Consider as well the addition of a Human Resources Coordinator (see **A.5**) that can train complaint managers and support these individuals at the schools and who will be point person for investigations across the district, as well as for managing all personnel data. This person should report to only one administrator, but could be co-evaluated by the human resources supervisor and Title IX/Federal programs supervisor, who is also the human rights officer for the district.

Making these revisions to policy over the next two years will greatly assist the district in ensuring greater safety and a more positive learning environment for every child.

Administrative Functions: The following actions are recommended to the Blount County Schools Director of Schools:

A.1: Develop policy in accordance with the criteria in **Exhibit 1.1** and the specific requirements suggested above in the governance section, for adoption by the board. The following are to be incorporated into procedures:

A.2: Develop procedures related to policy for the following:

I. Physical Security:

Develop procedures for inspecting safety points at all schools. Develop facilities plans that have as a priority the addition of all safety measures required in policy.

II. Harassment, Abuse, and Bullying Prevention:

Develop procedures that minimally require the following:

a. Highly trained complaint managers of both genders at every building.

b. Consistent complaint forms and follow-up process that is outside the scope of authority of assistant principals and principals, as these individuals are also involved in disciplinary actions, perhaps compromising their objectivity. Also suggest consequences/appropriate responses for

possible scenarios. Note how accountability will be assured in receiving, reporting to the central office, and following up on every complaint or report at all levels and according to designated timelines.

c. An investigation process and follow-up actions that are consistent, unbiased, and never decided by a single individual; a committee should always be involved in making decisions in harassment and related cases, even if staff are involved. Where complaints involve non-criminal but potentially biased or sensitive situations, use an investigator that is objective and that does not work within the district. Develop criteria for determining when such an outside investigator should be hired or "borrowed" from another county agency. An outside investigator is critical to a perceived and actually impartial investigation in the tight-knit community.

d. Accountability for following up on every complaint and concern, no matter how small.

e. A community liaison position with administrative authority who also coordinates all communication within and outside the district. This person is tasked with receiving and following up on any complaints from parents, students, or community members that are outside responsibility of the complaint managers at the building level or that come into the central office.

f. An information management system for tracking complaints and concerns and the resulting follow-up. This system is online, searchable, and can coordinate information across multiple departments. This system must primarily function within the scope of the human resources department, since it touches on employee job performance and training.

Require increased trainings on Vector to include recognizing and avoiding inappropriate situations with students (ensuring conduct is always observable and accountable) and on implementing trauma-informed practices. Reinforce expectations at every building by reviewing all discipline referrals, visiting departments/grade levels, and gathering feedback from student focus groups. Make these trainings mandatory for existing and new employees.

III. Mental Health and Wellbeing:

Develop procedures for a full-scale adoption and implementation of the mental health supports outlined in policy. Use survey instruments with students, parents, and teachers to gauge their effectiveness. In these procedures, training in all mental health support, SEL, and behavior management practices should be annual, particularly if referrals by a particular teacher have not been minimized, or if complaints regarding a specific staff member persist.

Train teachers (in conjunction with revisions to code of conduct policy) and instructional assistants in restorative practices and trauma-informed practices for understanding and addressing disruptive behaviors and student-student conflict. Monitor for implementation in classrooms; continue to train, model, and monitor therapeutic approaches with students to minimize disruptions wherever possible before students need to be referred to a mental health counselor or psychiatric evaluation. The majority of behaviors can be avoided if teachers know how to respond in the moment to students who are in crisis or who have limited coping mechanisms (or coping mechanisms that are destructive, harmful to others, or self-harming).

Require an information tracking system for every child to note risk factors to facilitate early intervention and supports to students and their families. Require procedures that outline how to manage and use this system. Keep this information in "support portfolios" online so they can "travel" with children as

they move around within (or even outside) the district. Keep records of any behavior interventions or supports that are or were required.

IV. Positive and Save School Climate/Environment:

Develop procedures for using climate survey data in deciding required trainings for individual staff members (including teachers, classified staff, and building administrators). Require training and improvement plans from personnel who have low/poor ratings on these surveys, or who have repeated or persistent complaints regarding their conduct with students (such as disrespectful treatment, yelling, inappropriate management practices, etc.). Note these concerns and requirements in personnel files. No building-level position should be exempt from this requirement.

V. Communication, Reporting, and Information Management:

Develop procedures that minimally direct the process for receiving, investigating, follow-up on, and resolving complaints of any kind (see **A.1** above). These procedures should address the following:

VI. Ongoing Implementation:

Assist the board in reviewing and revising policy and providing data and reports from climate surveys, focus groups, and complaint data to inform decision making and revisions.

A.3: Use program-based budgeting (see the Curriculum Audit Report for more information on this approach), prioritize the safety measures, needed professional development, and increases in staffing that are necessary for improving the safety and quality of every child's school.

A.4: Have regular meetings with county government to share goals, progress in making change, and to update them on financial needs or improvements. See these meetings as an opportunity to promote the district, improve transparency, and receive feedback on performance.

A.5: Add two key positions in the district, a Community Liaison, at the Supervisor level, and a Human Resources Coordinator, at the Coordinator level. These two positions are critical to the consistent and safe functioning of the district.

Community Liaison: this person should report directly to the Director and serve as a district Ombudsman. Given the size of the district, this position could also supervise all communications for the district if he/she had a full-time specialist to support them in the communications role. The community liaison should be responsible for developing and managing the system for receiving any and all concerns and complaints and their subsequent investigation and resolution. The Liaison would also oversee, in conjunction with the HR Coordinator, the data management system for housing personnel data, along with the complaint data from the liaison's office. In this way, even complaints at schools would still be reported to the central office, be logged, and accountability for their investigation and resolution would be assured.

The community liaison also liaises with the community and county, answering questions and responding to concerns. Where investigations of any situations may pose a conflict of interest or may present a position of bias (based on a review of set criteria), the liaison will hire an investigator from an outside agency (such as the Dept of Education or someone the county could suggest).

Human Resources Coordinator

Create a position for a human resources coordinator that reports to the department supervisor. This position should be responsible for overseeing the database for managing all personnel-related information, as well as complaints and concerns that pertain to personnel or investigations. Although this position should report only to the human resources supervisor, the position can be co-evaluated by

the Community Liaison and human resources supervisor, as the responsibilities of this individual span both departments.

The human resources coordinator would have responsibility for the database as well as all benefits and compensation, supporting payroll, and would oversee the specialist tasked with entering all data from scanned or paper files into the new database. Additionally, the position would oversee investigations, reporting findings to the human resource supervisor, and in turn, the community liaison.

Consider the addition of a certified specialist who could assist in all the responsibilities of the human resources department, particularly In the execution of investigations of complaints.

A.6: Conduct a functional job analysis. This analysis is a clinical, objective approach to identifying and merging critical functions required in a department, such as Support Services or Human Resources, into positions with the applicant credentials specified that are needed to perform those functions. Such an analysis should be performed by an outside HR specialist (consult the School Board Association or the TN State Department of Education for suggested vendors).

A.7: Continue to revise policy and regulations (procedures) as needed and cyclically, presenting to the Board for their review.

A.8: Provide regular reports to the board concerning progress made in implementing the steps outlined in this recommendation.

Attending to these recommended actions will result not only in improved safety, but also in a more positive, welcoming climate for both students and staff. Accountability for the expectations of the board creates a secure environment within which innovation and creativity can thrive. Safe, secure students are given the maximum support to learn and reach their full potential, and the community is assured their children are in the best possible environment.

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Appendices

Appendix A: Auditors' Biographical Data

Holly J. Kaptain, PhD

Holly J. Kaptain is the President and Chief Executive Officer of Curriculum Management Solutions, inc., owner of the Curriculum Audit and Audit Trainings. She has worked in public education for over 25 years, teaching at every grade level and more recently in higher education at Iowa State University, where she was a program director of a bilingual and two-way immersion program for culturally and linguistically diverse students. She is a CMSi (Curriculum Management Solutions, inc.) licensed trainer in deep curriculum alignment and has participated in over 32 audits in 15 different states since 1996. Dr. Kaptain graduated with a BA from St. Olaf College in Minnesota and completed curriculum management audit training in St. Paul, Minnesota, in July 1996. She completed her MS in Curriculum and Instruction and her PhD in Educational Administration at Iowa State University. She has presented at regional and national conferences on bilingual education research, instructional efficacy, and curriculum design and development.

Dr. Kaptain is a member of Phi Delta Kappa, the National Association for Bilingual Education, the American Council of Teachers of Foreign Languages, as well as other honor and professional organizations.

Rosanne Stripling, EdD

Rosanne Stripling is retired from Texas A&M University-Texarkana where she served as Professor of Education Leadership, Dean of the College of Arts and Sciences and Education, and Provost and Vice President for Academic Affairs. Prior to entering higher education employment, Dr. Stripling had a long career in PreK-12 public education. Her last appointment was superintendent of schools for the Waco Independent School District in Waco, Texas. Dr. Stripling received her bachelor's and master's degrees from Texas A&M University-Commerce and holds a doctorate in education leadership from Baylor University. A curriculum management auditor since 1997, a lead auditor for 22 years, and a senior lead auditor since 2015, she has conducted audits of small, medium-sized, and large districts in Texas, Alaska, Arizona, Kansas, California, Washington, Vermont, Maryland, Missouri, Kentucky, North Carolina, and Ohio. Dr. Stripling is also a licensed trainer for the Curriculum Management Improvement Model (Levels I and II) and 50 Ways to Close the Achievement Gap.

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Appendix B: Sources

Collaborative for Academic, Social, and Emotional Learning (CASEL), www.CASEL.org

www.Schoolsafety.gov; a collaborative, interagency website created by the federal government to provide schools and districts with actionable recommendations to create safe and supportive learning environments for students and educators.

National Center for School Safety, www.nc2s.org

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