

**St. Coletta School**  
**Parent Handbook and Policies**  
**(for review)**

# Parent Handbook

2022-2023



## St. Coletta School

1901 Independence Avenue, SE  
Washington, DC 20003

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## **ST. COLETTA SCHOOL CALENDAR 2022-2023 (7/2022)**

**SCHOOL INSTRUCTIONAL HOURS:** MON/TUES/THURS/FRI (8:30AM TO 3PM); WED (8:30AM TO 12:30PM)\*

\*AFTER CARE IS NOT AVAILABLE THROUGH THE SCHOOL ON EARLY DISMISSAL DAYS

### **AUGUST 2022**

**Wednesday, August 17:** New Hire Orientation Begins

**Wednesday, August 24:** Returning Staff Orientation

**Monday, August 29:** First Day of School

### **SEPTEMBER 2022**

**Monday, September 5:** Labor Day (School Closed)

**Wednesday, September 21:** Staff Development Day (No School for Students)

### **OCTOBER 2022**

**Monday, October 10:** Indigenous Peoples Day (School Closed)

**Wednesday, October 26:** Staff Development Day (No School for Students)

### **NOVEMBER 2022**

**Friday, November 11:** Veterans Day (School Closed)

**Wednesday, November 23 – Friday, November 25:** Thanksgiving Holiday (School Closed)

### **DECEMBER 2022**

**Wednesday, December 21 – Monday, January 2:** Winter Break (School Closed)

### **JANUARY 2023**

**Tuesday, January 3:** Students/Staff Return from Winter Break

**Monday, January 16:** Martin Luther King Jr. Day (School Closed)

### **FEBRUARY 2023**

**Wednesday, February 8:** Staff Development Day (No School for Students)

**Monday, February 20:** Presidents Day (School Closed)

### **MARCH 2023**

**Wednesday, March 15:** Staff Development Day (No School for Students)

**SY 22-23 Calendar Continued**

**APRIL 2023**

**Monday April 17 – Friday, April 21:** Spring Break (School Closed)

**MAY 2023**

**Wednesday, May 17:** Staff Development Day (No School for Students)

**Friday, May 26:** Half Day Dismissal for Students

**Monday, May 29:** Memorial Day (School Closed)

**JUNE 2023**

**Monday, June 19:** Juneteenth (School Closed)

**JULY 2023**

**Monday, July 3 and Tuesday, July 4:** Independence Day (School Closed)

**Friday, July 28:** Last Day for Students (1/2 Day Dismissal for Students)

**In the event of school closure:**

In the event virtual instruction cannot be delivered on days impacted by inclement weather or other emergencies, the school may use Staff Development Days, scheduled breaks, or federal holidays to make up instructional time as needed.



## Important People of St. Coletta of Greater Washington

Main: (202) 350-8680

Fax: (202) 350-8699

President, St. Coletta Board of Trustees  
Chief Executive Officer  
President, St. Coletta Special Education PCS  
Board of Trustees  
Charter Board Parent Representatives

Chief Financial Officer  
Chief Operating Officer  
Chief Development Director

Principal (ext. 1051)  
Assistant Principal- Houses 1 and 2 (ext. 1039)  
H1 Administrative House Assistant  
H2 Administrative House Assistant (Lead AHA)

Assistant Principal- Houses 3, 4, and 5 (ext. 1031)  
H3 Administrative House Assistant  
H4 Administrative House Assistant  
H5 Administrative House Assistant

### Behavior Department

Director of Therapeutic Services (ext. 1038)  
Therapy Leads

Vocational Coordinator (ext. 1074)  
\*also serves as Title IX Coordinator

IEP and Assessment Coordinator (ext. 1004)  
Special Education Coordinators

Director of Admissions (ext. 1002)  
Attendance Coordinator  
Transportation Coordinator  
Front Desk Manager

Sue Goodhart (ext. 1001)  
Michael Rodrigues (ext. 1001)  
Peggy O'Brien (ext. 1001)

Josh Lewis, Carla Ware-Easterling (ext. 1001)

Michael Olivarri (ext. 1001)  
Kaiheem Mason (ext. 1001)  
Rebecca Hill (ext. 1001)

Amy Warden  
Shannon Ball  
Shanae Carter (ext. 1012)  
April Adams Fowler (ext. 1017)

Dave Knight  
Julian Dixon (ext. 1020)  
Sharmarte Banks (ext. 1075)  
Tashana Rose (ext. 1079)

Ester Pline (ext. 1122)  
Susan Kloha (ext. 1059)

Loni Licuanan  
Katherine Chappell (ext. 1073)- OT/PT  
Jessica Venglarcik (ext. 1073)- Social Work  
Amanda Soper (ext. 1071)- Speech/AT  
Jehan Jones (ext. 1022- Nursing Dept)

### Lucas LaFaver

Robert Blessing (x1012)  
Krista Dews (ext. 1017)  
Devin McGrath (ext. 1020)  
Nicole Aaron (ext. 1075)  
Lisa Melbourne-Smith (ext. 1079)

Catherine Decker  
Judyvette Acevedo (ext. 1005)  
Shandell Matthews (ext. 1024)  
Gwen Green (ext. 1000)

## **IMPORTANT CURRENT PHONE NUMBERS**

### **TRANSPORTATION SERVICES**

D.C. Transportation . . . . .	202-576-5000
Alexandria City Transportation . . . . .	703-461-4169
Montgomery County Transportation. . . . .	301-840-8130
Prince George's County Transportation. . . . .	301-952-6572/6579
Fairfax County Transportation . . . . .	703-446-2031

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## **ANSWERS TO FREQUENTLY ASKED QUESTIONS**

Here are some questions that have been raised by parents over the years. We think you will find the answers helpful. Of course, your own questions are always welcome as we work together to serve your child.

### ***Tell me about the school my child is now attending.***

St. Coletta of Greater Washington is an independent, non-sectarian, non-profit organization whose mission is to serve children and adults with intellectual disabilities. Individuals may also have diagnoses of autism and other primary or secondary disabilities. At St. Coletta, we believe in the immeasurable value of the human spirit and in the right of each individual to live as full and independent a life as possible. We respect the dignity of all persons entrusted to our care and our goal is to serve them in an atmosphere that encourages their talents, celebrates their successes and builds their self-esteem. At St. Coletta, each person is recognized for personal strengths rather than by needs and is evaluated by their potential rather than by our expectations. Our goal is to give individuals with intellectual disabilities every chance to show the world what they can do.

St. Coletta, an 11-month program including six weeks of Extended School Year, focuses on the individual and what they need to learn in order to be successful in school and in the wider community. We believe that individuals learn best through hands-on, exploratory experiences. Teachers and therapists plan an integrated theme-based approach and develop a series of learning experiences that allow children to explore a subject while working on skills and competencies spelled out in their Individualized Education Program (IEP). St. Coletta is an ungraded, full-time special education program serving students aged 3 to 22. The basic program includes: functional academics (linked to Common Core Standards), skills of daily living, community-based instruction, adaptive physical education, arts education, computer skills and vocational training.

### ***What is the history of St. Coletta School?***

St. Coletta was founded in 1959, in Arlington, Virginia, by Joe and Hazel Hagarty. Their daughter had Down Syndrome, and they were not satisfied with programs offered by the local public schools and were unwilling to send their daughter to an institution. Before acquiring the new DC site in September, 2006, to open the St. Coletta Special Education Public Charter School, the school occupied space at St. Coletta School on Peyton Street in Alexandria, St. Charles School in the Clarendon Presbyterian Church, and at Marymount University.

### ***What are the facilities like and what special equipment is available?***

St. Coletta School is located in a beautiful, state-of-the-art facility, which occupies 99,000 square feet at 19th Street and Independence Avenue, SE, in the District. Students have access to a variety of technology including computers, touchscreen monitors, and tablet devices (e.g., iPads). Assistive technology and adaptive devices are available to all students with a need for such devices. There are studios for art, music, physical therapy, and horticulture. A sensory room and hydrotherapy pool are available as per student need. A full-sized gymnasium and outdoor basketball court are available for students, as well as an adapted playground, an amphitheater for outdoor arts and a school garden.

Kitchen facilities are included in each house. Outdoor cameras and round-the-clock security are available to ensure the safety of staff and students, and assist in maintaining a secured environment.

### ***What does a typical classroom look like?***

At St. Coletta, a typical classroom consists of 9-12 students, a teacher, and paraprofessional staff. Paraprofessional staff support students as specified on IEPs.

### ***What is the tuition at St. Coletta? Are there any other fees I'll need to pay?***

All students at St. Coletta are publicly funded. Periodically, the school may request money for special activities; however, no student is ever denied an opportunity to participate in an activity due to lack of funds. St. Coletta does not accept private pay tuition.

### ***What services does St. Coletta School offer?***

The program of services is developed, and is always evolving, as an extension of the IEP for each student. The program is planned with a vision that St. Coletta graduates are happy, productive individuals living as independently as possible.

## **BASIC PROGRAM**

The goal of the basic educational program is to help students achieve their (IEP) goals, increase their independence, utilize their community, express themselves in a variety of ways, promote their health and well-being, and encourage their peer relationships. The basic program can include:

Functional Academics	Daily Living Skills	Behavior Support Services
Community-Based Instruction	Adaptive Physical Education	Computer/Keyboard Skills
Music and Art Classes	Hydrotherapy	Horticulture

## **SPEECH/LANGUAGE THERAPY**

Speech/language therapy is provided to the students as indicated on their IEPs. Speech/language therapy focuses on providing each student with a functional system of communication using speech, sign, picture symbols, assistive devices, or a combination of these so that the student can express their feelings, wants, and needs, as well as participate in their educational program.

## **OCCUPATIONAL AND PHYSICAL THERAPIES**

Occupational and/or physical therapy is provided to students as indicated on their IEPs. The therapists work with the classroom teachers, the PE teacher and the vocational staff on a regular basis. The goal of physical and/or occupational therapy is to help the student access the educational environment. The physical therapist focuses on improving gross motor skills, balance, and range of motion, and the occupational therapist focuses on improving fine motor, eye-hand coordination and management of the sensory environment, so that the student is better able to perform functional academics and the tasks of daily living, hands-on classroom projects, and eventually vocational skills, as possible.

## **COUNSELING**

Counseling is provided to students as indicated on their IEPs. Students who require counseling may receive these services at St. Coletta School. Counseling focuses on helping students improve their social-emotional skills and improve peer interactions within their educational environment.

## **VOCATIONAL PROGRAM**

The Individuals with Disabilities Education Improvement Act (IDEIA) regulations require that all persons with disabilities age fourteen and older receive transitional and vocational services. All students that are DC residents begin transition planning at age twelve. To this end, St. Coletta provides pre-vocational skills and career-based training preparation. The goal of the career-based program is to help students learn about the world of work and provide them with the skills and support to make a successful transition to employment, supported employment or an appropriate post-secondary program, upon graduation. In order to provide guidance and instruction, any of the



following staff may accompany students into the community: teachers, therapists, and paraprofessionals (job coaches and teacher assistants). In addition, if a student has a dedicated aide, an aide will accompany them into the community.

### **BEHAVIOR SUPPORT SERVICES**

Our Behavior Team provides positive behavior support strategies designed to help students with challenging behaviors have a safe and successful experience at school. The team, made up of Board Certified Behavior Analysts (BCBAs), Board Certified Assistant Behavior Analysts (BCaBA), and Registered Behavior Technicians (RBTs), conduct Functional Behavior Assessments and from them, develop Positive Behavior Support Plans designed to teach students appropriate and effective alternatives to behaviors of concern. Through the use of its Positive Behavior Training Suite, students may receive additional instructional support through individual work systems focusing on specific IEP objectives which employ the principles of TEACCH and the fundamentals of Applied Behavior Analysis. These systems can then be generalized to the classroom or other settings to further support student instruction.

### **ASSISTIVE TECHNOLOGY**

St. Coletta believes that each student has the right to assistive technology devices that may remove a barrier to learning and increase access to the educational curriculum and/or educational environment. The Multidisciplinary Team will work together to make data-driven decisions to help with the selection of appropriate assistive technology for each individual student. Assistive technology devices may include adaptive equipment, hearing aids, an augmentative communication device, or a computer program or adaptation.

### ***How is my child's IEP developed and who participates at the meeting?***

If a child/student enrolls with a valid IEP, an IEP review is held; then at a minimum annually thereafter. We expect the LEA representative, the parent or guardian, the transition-aged student, and the teachers and therapists to be active participants in the scheduling and development of the IEP. Re-evaluation meetings are held at least once every three years by the IEP team to determine whether further individualized testing is indicated for the purpose of determining the student's eligibility for special education services. If a student enters without an initial IEP a parent or school staff can refer the student for an evaluation to determine eligibility for special education services.

### ***Besides participating at the IEP, how will my local school jurisdiction be involved in my child's education?***

The administration of St. Coletta keeps in close contact with the school jurisdictions responsible for each student. It is our goal to work as a team in providing the best possible services for our students. St. Coletta staff members inform the jurisdictions of progress or any other matters of concern involving students.

### ***How do we know our child is progressing? Will my child receive grades?***

Progress is noted on the IEP goals four times per year, as well as during IEP meetings which at a minimum must be held annually. These progress reports are sent home to parents and guardians. Parents/guardians are encouraged to make appointments at any time of the year to review their child's progress. Parents/Guardians are invited to the school to participate in mid-year parent teacher conferences to discuss your child's progress in more detail. St. Coletta does not use a traditional grading system. Data is maintained for each student, by the classroom teacher, to provide additional documentation of progress.

### ***Will my child have to participate in the State-wide testing initiatives?***

Decisions regarding student assessment are part of the IEP process. St. Coletta students often are not able to participate in the general statewide assessment, even with the maximum amount of testing accommodations allowed; thus, students typically participate in an alternate assessment, as prescribed by the jurisdiction, during those grade equivalent years in which students are required to be tested.

***If I am dissatisfied with some part of my child's IEP what recourse do I have?***

A parent or guardian can ask for a meeting of the Multidisciplinary Team to review the IEP and discuss their child's program at any time during the school year. The goal of the team, including the parent and the student of transition age, is to collaborate to create an educational program which meets the student's needs and provides the student with a free and appropriate public education. If the parent, guardian, or student who is their own guardian, does not agree with the recommendations of the team, the parent, guardian or student can initiate their due process rights and/or notify the local education agent (LEA) representative, as needed. You may call to schedule a meeting with your child's teacher and/or therapist(s) to discuss program concerns at any time.

***What will my child receive when he or she graduates from St. Coletta?***

Graduating students receive a High School Certificate at a graduation ceremony, if the IEP team has determined that a certificate is indicated. A student may graduate from St. Coletta at the end of the semester or year in which he or she turns twenty-two, depending upon the jurisdiction. Students who are at least eighteen years of age may choose to graduate sooner. Students and families work with appropriate adult agencies from their respective jurisdictions to aid in the transition process and/or identify appropriate programming and/or support for employment after graduation.

***How is the St. Coletta program structured?***

The St. Coletta program is ungraded and structured by age level. Each age level is a designated house. The upper ages of each designated age level may vary slightly depending on the individual needs of the students. Your child will be assigned a classroom and teacher. The primary contact for day to day communication is the classroom teacher. Teachers are supervised by Assistant Principals. Every house has a Special Education Coordinator who oversees the IEP process.

***How is St. Coletta handling education services in light of COVID-19?***

St. Coletta worked with the DC Department of Health and other stakeholders to develop an educational plan that meets instructional requirements as well as health regulations. Given the fluidity of the public health pandemic, future changes to guidance could occur and will subsequently be reflected in updates to the school's plan. For specifics related to the precautions currently being taken by the school to prevent the spread of COVID-19, please refer to St. Coletta's Re-Opening plan by visiting our website ([www.stcoletta.org](http://www.stcoletta.org)) or requesting a copy be mailed/emailed to you. Questions regarding this plan can be directed to a school administrator.

***How will I know what is going on in my child's classroom?***

Each student will be given a communication book on the first day of school which will go from school to home and back each day. The book provides a means of communication between parents/guardians and teachers. Parents or guardians are asked to read the book daily and either initial the latest entry or enter a comment. The communication book is a valuable aid to the home-school partnership. The books will be collected at the end of the school year and will become part of the student's anecdotal record. In addition, parents receive quarterly newsletters informing them of house activities.

***Am I allowed to visit my child's classroom?***

The school welcomes scheduled parent/guardian visits. However, to ensure the safety, privacy and well-being of our students we must know who is in the building at all times. All daily visitors must first sign-in at the school's front desk then wait for a school personnel escort before going any other place on school premises. The school may not be able to accommodate unannounced visits.

Note: All visits (including observations of in-person instruction) must be completed in compliance with all local health regulations related to preventing the spread of COVID-19.

***Will my child participate in Community-Based Instructional (CBI) activities?***

One of the primary components of the St. Coletta program is community-based instruction. Community-based instructional activities include frequent trips to area museums, parks, libraries, restaurants and

other community resources. Generally, community-based instruction is tied directly to the theme or lessons addressed within the classroom to allow for experiential learning to reinforce concepts taught in the classroom. Included in the Back-to-School packet is a Neighborhood Community-Based Instruction (CBI) Permission Form. This form is intended for a select group of commonly visited sites that are a regular part of the day-to-day school programming. For any other CBI outings, a separate permission form will be sent home and must be signed and returned to the teacher in order for the student to participate in that CBI. If parents/guardians do not sign the CBI form, their child will not be included on the outing. Verbal permission, for the most part, will not be accepted unless as authorized by an Assistant Principal under special circumstances.

### ***How is my child transported to school and on community-based instruction outings (CBIs)?***

Children are transported to and from school by their local public school jurisdiction. Transportation is a related service and must be provided in accordance with the child's IEP. Problems with transportation should be referred to the local jurisdiction, as well as to the school office. In the event that a student is unable to be transported home from school at the end of the day via bus due to illness or unsafe behavior, it is the responsibility of the parent/guardian to provide transportation home for their child in a timely manner.

The school owns passenger vans that may be used to transport students during the school day on CBIs. Only employees on the insurance policy for these vans may drive them. For school-wide trips, St. Coletta usually hires buses. Staff and students frequently utilize the metro and bus systems. Permission slips for community-based instruction will specify travel arrangements and modes of transportation.

### ***What is the length of the school day?***

School will be in session from 8:30 a.m. until 3:00 p.m. Monday, Tuesday, Thursday, and Friday. Students will attend according to a half day schedule on Wednesday (8:30am to 12:30pm). Students not being transported by bus are expected to be picked-up from the school no later than 3:30pm (Monday, Tuesday, Thursday, Friday) and 1:00pm on half day dismissals (Wednesdays or other designated half day dismissal days).

### ***What if I have to pick-up or drop off my child at school?***

If you bring your child to school, you must come in with your child and sign them in via the front desk after parking in the school's lot. Visitors may not park along Independence Avenue. Those dropping students off are asked to remain with their student in the lobby area until a staff is available to escort the student to class. Students with a fever or presenting symptoms of illness may not be permitted to attend class in-person until cleared by a health provider.

Parents must also sign students out at the school's front desk when picking students up from school. If you are picking up your child early or have pre-planned appointments, parents/guardians are expected to notify the Front Desk staff and child's teacher by 2:00 p.m.

### ***Do you offer before and after school care?***

There is no before school care or after care available. Parents may drop off students beginning at 8 a.m. and may pick students up beginning at 3 p.m. Monday, Tuesday, Thursday, and Friday and at 12:30pm on Wednesdays.

### ***What are the policies regarding attendance?***

Regular attendance is critical to ensure that students have every opportunity to progress academically. St. Coletta's school day begins promptly at 8:30 a.m. Students who arrive after 8:30 a.m. are documented as tardy (excused or unexcused) and, currently, students must attend for 80% of the school day to be considered "present."

Parents are responsible for communicating their child's absence to the school. Place a call to our student absence line at: (202)350-8680ext. 1101 or select option #3 when prompted. If the school does not receive a call from a parent/guardian, our attendance manager will call home to inquire as to the reason for the student's absence from school. **A written note by the parent/guardian must be received by the school within 5 days upon the student's return to school, as per DC regulations.** If a student is absent for 3 consecutive days or 10 cumulative days, further documentation, from a doctor or other staff from an agency or organization, may be requested in order to excuse the absence(s). At 4 unexcused absences, the school social worker calls the home to discuss attendance regulations and inform parent of accrued absences.

The reason for each absence is recorded. Valid excuses for absences include: illness (a doctor's note may be required), death in a student's family, observance of a religious holiday, required court appearances, lawful suspension or exclusion from school by school authorities, medical or dental appointments, and other absences approved in advance by the principal upon the written request of a parent or guardian. Any absence that does not meet the criteria of an excused absence or fails to satisfy the documentation requirement of an excused absence within the allowable timeframe will be classified as an unexcused absence. If a student or parent anticipates an absence not covered by the excused absences listed above, they may submit a request for an excused absence due to a special circumstance to the school principal.

Withdrawal or disenrollment will be considered for students with a history of non-attendance and/or disengagement. Disengagement includes extended absence from school without communication/notification/documentation as well failure to complete required paperwork (such as residency verification). Disenrollment will only occur once the school team has made sufficient attempts to reengage the family, obtain documentation supporting extended absences, and provided notice of withdrawal by way of a Prior Written Notice.

### ***What are the policies regarding truancy?***

#### District of Columbia Students

DC's Compulsory Education and School Attendance law requires youth ages 5 to 17 to be in school. Current DC regulations stipulate that in order for a student to be marked present for the school day, he or she must be present for at least 80% of the day. Students who are tardy or leave early for more than 20% of the day will be counted as absent.

If a student reaches 3 unexcused absences, a letter is sent home alerting the parent of attendance concerns. If a student accrues 5 unexcused absences an attendance conference will be scheduled with the parent and school social worker. The purpose of the conference will be to **review educational and attendance concerns, develop attendance intervention strategies, and identify local community resources to improve school attendance. If a student accrues 10 unexcused absences, a report of educational neglect will be made to CFSA, as required per DC regulations.** When a student accrues 15 unexcused absences, a referral will be made to Court Services Division of the Family Court and to the Juvenile Student Division of OAG.

Further information may be found at:

[https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page\\_content/attachments/FINAL%20DCPS%20Attendance%20and%20Truancy%20Policy%2008-21-18.pdf](https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page_content/attachments/FINAL%20DCPS%20Attendance%20and%20Truancy%20Policy%2008-21-18.pdf)

<http://www.lexisnexis.com/hottopics/dccode/>

<http://www.dcregs.org/Gateway/ChapterHome.aspx?ChapterID=230295>

#### Maryland Students

The *Code of Maryland Regulations (COMAR)* requires students ages 5 to 16 to attend school (some jurisdictions specify 18 years). If a student has 3 unexcused absences, a letter will be sent home alerting the parent of attendance concerns. If a student accrues 5 unexcused absences, an attendance conference will be scheduled with the parent and school social worker. Students who are habitually

truant, or miss more than 20% of days within a school year, will be referred to the Department of Juvenile Services.

Further information may be found at:

<http://www.oag.state.md.us/Opinions/2010/95oag191.pdf>

#### Virginia Students

The Commonwealth of Virginia's Compulsory Attendance Law, Code of Virginia, 22.1-254 requires students ages 5 to 18 to attend school. If a student has 3 unexcused absences, a letter will be sent home alerting the parent of attendance concerns. If a student accrues 5 unexcused absences, an attendance conference will be scheduled with the parent and school social worker. If attendance does not improve, the family will be referred to Juvenile Court.

Further information may be found at:

<https://law.lis.virginia.gov/vacode/title22.1/chapter14/section22.1-254/>

<https://www.fcps.edu/about-fcps/policies-regulations-and-notice/attendance-policies>

<https://www.acps.k12.va.us/site/handlers/filedownload.ashx?moduleinstanceid=4160&dataid=4258&FileName=13-Attendance%20Policy.pdf>

#### ***What is the school's policy on bullying?***

St. Coletta is committed to creating a safe learning environment for all students. It is the policy of St. Coletta to prohibit bullying, harassment or intimidation of any person on school property, school-sponsored functions, while in transit to school or school-sponsored functions, or by the use of electronic technology. Students who are found in violation of St. Coletta's bullying policy will be subject to consequences that are consistent with the school's bullying and discipline policy.

#### ***What is the school's policy on reporting suspected abuse or neglect?***

In accordance with DC Code (§ 4-1321.02) and St. Coletta policy, all school staff are considered mandated reporters. As such, any person who knows or has cause to suspect that a child has been or is in immediate danger of being abused or neglected must immediately report it to School Administrators. Training on these requirements is reviewed with all St. Coletta staff annually.

Should a parent suspect abuse or neglect, they may also contact the Metropolitan Police Department (MPD), Adult Protective Services (APS), or Child Protective Services (CPS) to make a report. CPS can be reached at (202) 671-7233. APS may be reached at (202) 541-3950 and MPD may be reached at (202) 727-9099.

#### ***Does my child need a physical exam before he or she can attend the school?***

District of Columbia regulations require that a physical and dental exam and a current record of immunization be on file for each student. This means, EACH AND EVERY YEAR, students are required to have a new physical and dental exam. St. Coletta may require more frequent physical exams for children with serious health and medication issues. DC students must comply with OSSE's Immunization Policy in order to attend school in-person. Students without current immunizations will have 20 school days to submit proof of required immunizations once notified by the school of non-compliance. If proof of immunization has not been provided within 20 school days, your child will not be allowed to return to school until documentation of needed immunizations is provided to the school. Each missed school day will be an "unexcused absence" until the proof of immunization is submitted. These absences will be "excused" once the proof of immunization is provided. Information about OSSE immunization policy can be found at the following link:

[https://osse.dc.gov/sites/default/files/dc/sites/osse/page\\_content/attachments/Immunization%20FAQ%20for%20Families\\_061422\\_0.pdf](https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/Immunization%20FAQ%20for%20Families_061422_0.pdf)

**NEW FOR SY 22-23:** Any student age 16 or older at the start of the 22-23 school year must have received their primary COVID-19 vaccination series (or be proceeding in accordance with the series) or they will be subject to OSSE's immunization attendance policies. Vaccination for students ages 5 through

15 years is strongly recommended.

[https://osse.dc.gov/sites/default/files/dc/sites/osse/page\\_content/attachments/FINAL\\_COVID%20Requirements\\_042722.pdf](https://osse.dc.gov/sites/default/files/dc/sites/osse/page_content/attachments/FINAL_COVID%20Requirements_042722.pdf)

### ***What happens in the event of inclement weather or school closures?***

During inclement weather days, St. Coletta will notify families of the school's operating status through the school's website, text alerts, social media platforms (Facebook and Twitter), and local news stations. To receive texts from the school, families must first provide the school with a phone number and/or email. Families will then "opt-in" by responding "YES" to a text sent to their mobile device.

MD and VA Students:

Parents should attend to their individual jurisdictional weather-related decisions on closures, delays and early dismissals.

St. Coletta plans to implement distance learning instruction to all students for days in which travel to/from school are impacted by inclement weather. If the school is unable to implement distance learning on these days, the school will make-up instruction on days that were originally scheduled as non-instructional days (e.g. Staff Development Days, breaks).

### ***My child takes medication. How are medications administered?***

All medication, both prescription and over-the-counter (Tylenol, cough drops, etc.), must be in the original labeled container accompanied by an Authorization of Administration of Medication form. The form must be signed by the physician and the parent/guardian, and is required for all medicines administered at school. Medicines **cannot be transported to school by the student, nor by the bus driver/aide.** Medications may only be brought by the parent/guardian or sent through the mail. The school needs to know what additional medications are administered in the home, in the event an emergency occurs during school hours. Medication procedures are overseen by the school nurse. Individual medications can be administered by staff that are medication trained. If a student requires a nursing procedure such as g-tube feeding or suctioning, an authorization form is required from the health care provider. In addition, parent/guardian permission is required in writing to apply sunscreen or any other lotion to a child.

### ***Are meals provided?***

St. Coletta School stresses healthy meals and snacks. All students receive hot breakfasts and lunches (multiple options are available) which are prepared daily in a USDA-approved kitchen. Students are also provided with snacks on an as needed basis. As all meals and snacks are provided by the school, and since many of our students have specific food allergies, outside food is not permitted. This includes all bottled drinks or packaged snacks. Students on special dietary restrictions must have permission from the school and a doctor's order specifying the nature of the medical necessity in order to bring their own lunches. Student birthdays are celebrated on a monthly basis in their individual houses. Parents will be notified of the date when these celebrations will take place and can provide store-bought items only. St. Coletta does not permit snacks or meals containing peanut products.

### ***How is student behavior managed?***

It is the philosophy of St. Coletta School to foster productive student behavior. Toward this goal, staff are expected to provide: clear rules for student conduct, collegiality among staff members, a pervasive caring environment for students, effective instruction, and a focus on providing positive reinforcement and options for students.

Effective methods for responding to disruptive student behavior include:

- Using positive redirection and reinforcement whenever appropriate;
- Developing positive personal relationships with students that indicate high teacher expectations and respect for students;
- Closely monitoring performance and behavior;
- Using brief, non-disruptive interventions;

- Handling conflicts calmly and avoiding engaging in power struggles;
- Clarifying students' choices so that options are clear and students are responsible for the consequences of their choices;
- Using effective listening skills to help students identify problems and gain insight.

When students exhibit serious behavioral difficulties, a Functional Behavior Assessment (FBA) and Positive Behavior Support Plan (PBSP) may need to be developed. St. Coletta School has Board Certified Behavior Analysts (BCBAs) to support this process. The development process should include the multidisciplinary team involved with the student and the following six steps:

- Attempt to determine the function(s) of the behavior through an FBA;
- Focus on one or two specific student behaviors that need to change in order for the student to have a successful school experience;
- Determine specific interventions to bring about these changes;
- Assign responsibility to staff for implementing each intervention;
- Determine the data to be collected to test the effectiveness of the intervention; and,
- Review the program at a minimum annually, or as determined by the IEP team.

Copies of the FBA and PBSP are discussed with and given to parents/guardians and staff working with the child. A copy is placed in the student's record.

St. Coletta staff members are trained in the Mandt System. All staff receive training in the Relational Section (Building Healthy Relationships, Communication, and Conflict Resolution). Depending on the specific needs of the school program, selected staff members receive training in the Conceptual and Technical Sections (Medical Risks of Restraint, Assisting and Supporting, Separating and Restraining.) Only staff members trained in the Conceptual and Technical level are allowed to intervene using this system. The Mandt System teaches a graded system of interventions, beginning with non-physical options and gradually moving towards physical options.. Physical intervention is used only as a matter of last resort when someone is a danger to themselves or others and the attempted non-physical interventions have not been successful. Parents must be notified if a restraint is utilized and a behavior plan must be developed.

There are quiet rooms at St. Coletta that are available for students to use if they need to calm themselves. These rooms are unlocked and students are never left alone. Use of the quiet room requires that an administrator be notified, an incident report written and the parent notified. St. Coletta policy prohibits the use of mechanical and chemical restraints.

The St. Coletta School Behavior Management Plan **strictly prohibits**:

- Corporal punishment
- Deprivation of drinking water or food necessary to meet daily nutritional needs;
- Denial of the use of toilet facilities;
- Any action humiliating, degrading or abusive;
- Deprivation of health care including counseling;
- Intrusive aversive therapy;
- Use of mechanical and/or chemical restraints.

If abuse or neglect is suspected, the school will contact Child Protective Services (CPS), Adult Protective Services (APS) or the Metropolitan Police Department (MPD). Before CPS/APS comes, a parent/guardian may be notified, unless the parent/guardian is the suspect. CPS/APS or the MPD may interview the child without consent from the parent or guardian. The parent may also contact any of these entities should they suspect any abuse or neglect. CPS may be reached at (202) 671-7233. APS may be reached at (202) 541-3950 and MPD may be reached at (202) 727-9099.

### ***What is St. Coletta School's policy on student suspension?***

While St. Coletta School is dedicated to serving students with challenging behaviors by providing

intensive behavior supports, there may be incidents where suspension is deemed necessary. In accordance with the “Student Fair Access to School Act of 2017”, no student under the eighth grade equivalent will be subject to an out-of-school suspension. This includes, but is not limited to: drug and/or weapon possession, incidents that may result in serious bodily injury, and other incidents of such nature in which it is felt the safety of the student and others is at risk. . Dependent on the seriousness of the offense and/or danger to others, outside authorities may also be contacted. Further disciplinary action, up to and including expulsion, may be considered. Parents will be notified via certified mail and phone of this decision within 24 hours of the suspension.

If suspension equals ten consecutive or cumulative days over the school year (five, if the student is a DCPS student), then a Manifest Determination IEP meeting must be held. A Manifest Determination Meeting, per DCPS and other jurisdictional regulations, will be scheduled within ten days to determine if the behavior was a manifestation of the child’s disability. Depending upon the outcome of this meeting, the recommendations of the IEP team will be implemented. Please refer to the Discipline Policy within your yearly Back-to-School packet for additional details.

***My child has difficult behaviors. Can he/she be discharged from the program?***

Although St. Coletta is committed to serving difficult-to-place children, there are times when we feel we cannot provide the intensity of service that a child requires. An IEP to discuss placement would be held in these circumstances and our recommendations of such would be made. DCPS or other jurisdictions would then provide alternate placement options. In terms of day-to-day behavior difficulties, we are dedicated to providing students the needed supports to be successful in the classroom.

***What is the school’s weapons/drug policy?***

Any student who brings a weapon or an object that could be used as a weapon to school, brings drugs to school, or is involved in a situation that causes serious bodily injury can be suspended or expelled immediately. Depending upon the seriousness of the offense or the danger to others, outside authorities may be called. Further disciplinary action as noted under the student suspension policy section and within the Discipline Policy will be followed.

***Does the school have an emergency preparedness plan?***

St Coletta staff has a safety plan to be implemented in the event of a chemical or biological attack. If a terrorist action should materialize, we will immediately go into a lockdown mode. This means that parents and guardians should not come to the school, but should wait by the phone. If you have a cell phone number that we do not have, please provide it to the school by calling the Front Desk or notifying your student’s teacher. The building occupied by St. Coletta has windows that are sealed. In case of a biological or chemical event, we would shut down our air handlers and close off the ventilation systems to the best of our ability. We will not open the doors to anyone except official security or police personnel since to do so would compromise the air in the building. No one should come before they are notified. Emergency water and food supplies are stocked in the building. There will be enough food and water to last three to four days.

The school has a delineated plan for fire and other emergency-related events (e.g. earthquake, tornado, violent intruder). All staff are trained in emergency procedures. Students and staff practice drills throughout the year as prescribed by regulations.

**Regarding transportation and emergency planning:** Though this is largely in the hands of the local school jurisdictions, we have communicated to them our suggestions. If buses, taxis and vans are in route and close to the school, students will be delivered to the school. If transportation has recently departed the school with students, they will return students to the school. If buses, taxis or vans are close to students’ homes for pick-up in morning or delivery in afternoon, students will be taken to their home. If students are at a career-based training site and the event is chemical or biological they will have to remain there with the staff that accompanied them. We will work with employers to discuss their safety procedures. If the event is not chemical or biological, students will be retrieved from training sites and brought back to St. Coletta. Parents/guardians will be notified when it is safe to come and get their



children. In the event of an emergency or crisis-related event, St. Coletta will send a text message and/or e-mail to parents notifying them of the emergency. To receive this message, a cell phone number and/or e-mail, must first be provided by the parent/guardian to the school. Once the school has a number on file, families need to “opt-in” in order to receive text messages. Families may opt-in by responding “YES” to a text message sent to their device. This text message system will only be used in the event of an unusual circumstance.

As you are well aware, there are no guarantees in these situations and we will all do whatever we can to ensure the safety of our students first and everyone involved.

**Parent/Guardian phone numbers/e-mails:**

It is critical that you provide us with current phone numbers, in case of an emergency. If your phone number changes, it is your responsibility to call and update us so we can update our records. Your phone number (and e-mail if you have one) will be added to our emergency text notification system so that in an event of an unusual occurrence, we can notify you and provide instructions, if needed. If you do not want your information in this system, please call the school to inform us.

***Why can't I send my child to school when they are sick?***

Health regulations require that a child with a contagious illness, a severe cold, sore throat or cough, or who has a badly upset stomach must be kept home. A child with a fever must be kept at home for 24 hours after the temperature has returned to normal. The office should be immediately informed regarding a child who has a contagious illness or infection. **If your student is exhibiting any symptoms of illness, please do not send them to school.**

Students exhibiting symptoms of illness or with a temperature above 100.4 degrees will not be permitted to remain at school. Once contacted, parents/guardians must make arrangements to pick students up as soon as possible, if and when they become ill.

***Since the staff members know my child so well can teachers and assistants provide services to me at home?***

Due to the family atmosphere fostered at St. Coletta and the needs of the students, the staff may become well-acquainted with the parents/guardians. While such relationships are wholly acceptable, and are in fact necessary to successful education, professional integrity and confidentiality must be maintained at all times. In keeping with this standard, staff may not babysit, provide respite care, or transport students for pay in their own vehicles. All communication regarding the student is relayed through your child's teacher or related service provider working with your child.

***Who is allowed to see my child's records?***

All data in your child's educational record is available for parents' and guardians' inspection and review. Student educational records includes a cumulative file and incident reporting file kept onsite at school in a secure space as well as electronic records kept by your child's jurisdiction (e.g. EasyIEP or Maryland Online). Records specific to medical needs (e.g. visit notes, medication/feeding logs, authorizations/orders) are also electronically maintained by the school's nursing team.

Parents/Guardians have the right to:

- Inspect and review the student's scholastic records within a reasonable period, but not to exceed 45 days from the day the school receives a request for access;
- An explanation and interpretation of records;
- Copies of records and names of people who have seen the records;
- Give or withhold consent to other people seeing their child's records except to the extent that The Family Educational Rights and Privacy Act (1993) (FERPA) authorizes disclosure without consent;
- Request destruction of records which are no longer needed;
- Request that information be amended that is inaccurate, misleading or violates privacy or rights;

- File a complaint with the U.S. Department of Education concerning alleged failures by the school to comply with the requirements of FERPA (1993) and Health Insurance Portability and Accountability Act HIPAA(1996);
- Review only records pertaining to their child.

No one else, other than authorized school and LEA level personnel, may review the student's records without a Release of Information form signed by the parent or guardian, unless as authorized by FERPA. Please see the FERPA Guidelines as provided as part of your yearly back-to-school packet.

### ***What about photographs?***

St. Coletta School uses student photos for instructional and classroom purposes throughout the school year. In addition, sometimes pictures are needed for school publicity purposes (including social media platforms or other community outreach purposes). Student photos will not be released publicly without permission from the parent/guardian. A photographic release form is provided for this purpose. If you wish to change the level of permission for your child, please contact the school and request a new photo permission form.

Please be advised that parents desire to take pictures/videos during special holiday or other performances. Additionally, students take a class photo each school year on our scheduled Picture Day. If you do not want your child's photograph or video taken in either circumstance, let your teacher know that you do not want your child to participate. It is reasonable to expect that parents/guardians want pictures/videos of their children performing in special activities and many students/families enjoy receiving annual class photos.

### ***What is the school's policy on cell phones and electronic devices?***

The use of cell phones and electronic devices are not allowed in the classroom. If you need to contact your child, please call the main office and they will be notified. Students who participate in our independent work and travel program as indicated on their IEP or appropriate permission forms will sign out school provided phones. If a student continuously disregards school policy on personal cell phone and electronic device use, the school will require that the device is placed in a secure location during the day to be returned to the student at the end of the day. The parent/guardian will be notified. A meeting will be scheduled with the parent/guardian, teacher and school administrator as necessary. The school is not responsible for any electronic devices students bring to school.

Chromebooks provided to students are the property of St. Coletta and are intended to be used only for instructional purposes while engaging in distance learning. Parents/Guardians must notify the school should a device become lost, stolen, or damaged. Distributed Chromebooks should be returned to the school at the conclusion of distance learning. More information about the school's technology policy is available on the school's website ([www.stcoletta.org](http://www.stcoletta.org)).

### ***Can I learn about the qualifications of my child's teacher?***

A parent/guardian may inquire about the qualifications of their child's teacher at any time. All inquiries may be directed to the school principal or assistant principals.

### ***How will the school inform the parents about the State Education Agency Complaint Resolution Policy?***

St. Coletta will send a copy of the District of Columbia State Education Agency Complaint Policy to families annually. Families may also use the school's board as one avenue for conflict resolution if an issue cannot be resolved between the family and school-based leadership. Contact information for the school's board can be found in the "People of St. Coletta" portion of this handbook. Information about St. Coletta's complaint policy can be viewed by visiting the school's website ([www.stcoletta.org](http://www.stcoletta.org)).

### ***Is there a dress code?***

St. Coletta students are not required to wear uniforms. Clothing should be safe, comfortable and not restrictive to learning activities. Open-toed shoes, high heels, and heavy work/hiking boots are not permitted. Clothing should be free of loose strings around the neck or other items that could cause injury during active play; this includes, but is not limited to, heavy chains (worn as necklaces, belts, or hanging from belt loops). Short skirts and dresses should be an appropriate length and blouses must have no less than a two inch strap. In the event your child needs a change of clothing, it is requested that you send an extra pair of clothing to school (labeled with your student's name), including underwear.

### ***Can my child participate in Special Olympics?***

Interested students aged 8 years and older may participate in Special Olympics provided that appropriate paperwork has been supplied to the school. Special Olympics provides opportunities for peer social interaction and exposure to life-long leisure and healthy lifestyles. A separate medical form and permissions are required to be completed, if you want your child to participate. Please contact Shandell Matthews at (202)350-8680 ext. 1024 or smatthews@stcoletta.org to obtain the required forms.

### **CHARITABLE CONTRIBUTIONS**

Charitable Contributions are essential to sustain the quality of services at St. Coletta School because tuition and fees cover only a portion of the cost needed to meet the needs of each child in our care. Each year we must raise approximately \$500,000 to meet our general operating expenses. Achieving this goal requires the support of foundations, corporations, organizations and hundreds of individuals in the metropolitan area. Contributions allow us to bring special services such as community-based instruction, participation in Special Olympics, adaptive equipment in Assistive Technology, arts programs and field trips to our children and young adults. St Coletta invites and appreciates your support.

### **More Questions?**

Please call 202-350-8680

*St. Coletta of Greater Washington admits students and clients of any race, color, religion, nationality, ethnic origin, gender or age to all the rights, privileges, programs and activities generally accorded to or made available to students and clients of St. Coletta. It does not discriminate on the basis of race, color, religion, nationality, ethnic origin, gender, sexual orientation, age or veteran's status in educational programs or in other school-administered activities. St. Coletta does not discriminate on the basis of race, color, religion, nationality, ethnic origin, gender, sexual orientation, age, disability, veteran's status, or any other factor protected by local, state, or federal law with regard to employment.*

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*School employees are required by law to report suspected cases of child abuse or neglect to Child Protective Services or Adult protective Services.*

*Handbook Revised January 2022  
Handbook Available on line at [www.stcoletta.org](http://www.stcoletta.org) and is subject to revision*



**FERPA NOTIFICATION (rev. 6/2022)**

The Family Educational Rights and Privacy Act (FERPA) is the federal law designed to protect the privacy of a student's education records. Schools are required to notify parents and eligible students annually of their rights under FERPA. Upon request, St. Coletta discloses education records without consent to officials of another school or school district in which a student seeks or intends to enroll, or is already enrolled if the disclosure is for the purposes of the student's enrollment or transfer.

FERPA grants five rights to parents with respect to their children's scholastic records. These rights transfer to the student, or former student, upon reaching the age of 18. These rights are as follows:

- **The right to inspect and review the student's scholastic records** within a reasonable period but not to exceed 45 days after the day the school receives a request for access. Parents or eligible students should submit to the school principal or assistant principal a written request that identifies the record(s) they wish to inspect. The school principal or other appropriate school official will make arrangements for access and notify the parent or eligible student of the time and place where records may be inspected.
- **The right to request the amendment of a student's scholastic records** that the parent or eligible student believes are inaccurate or misleading. Parents or eligible students may write the school principal, clearly identify the part of the record they want changed, and specify why it should be changed. If St. Coletta decides not to amend the record as requested by the parent or eligible student, the school will notify the parent or eligible student of the decision and advise them of their right to a hearing regarding the request for amendment.
- **The right to consent to disclosures of personally identifiable information contained in a student's scholastic records**, except to the extent that FERPA authorizes disclosure without consent. For example, FERPA authorizes disclosure without consent to school official whom St. Coletta has determined to have legitimate educational interests. A school official is a person employed by St. Coletta as an administrator, supervisor, instructor, or support staff member; an official of another school system where a student seeks or intends to enroll, or where the student is already enrolled. A school official has a legitimate education interest if the official needs to review an education record in order to fulfill his or her professional responsibility.
- **The right to withhold disclosure of directory information.** At its discretion, St. Coletta may disclose basic "directory information" that is generally not considered harmful or an invasion of privacy without the consent of parents or eligible students in accordance with the provisions of District law and FERPA. Directory information includes:
  - A. Student Name
  - B. Student Address
  - C. Student Telephone Listing
  - D. Name of Attending School
  - E. Participation in Officially Recognized Activities and Sports
  - F. Student's Date and Place of Birth
  - G. Names of Schools Previously Attended
  - H. Dates of Attendance

If you do not want St. Coletta School to disclose directory information from your child's education records without your prior written consent, you must notify the LEA within two months of your child's enrollment in the school.

- **The right to file a complaint with the U. S. Department of Education concerning alleged failures by the school to comply with the requirements of FERPA.** The name and address of the office that administers FERPA are: Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Ave, SW, Washington, DC 20202.



Eligible students and parents of minor students have the right to see their records. In general, parental consent is required for others to access information in a student's records. Below are some circumstances under which consent is not required (See 20 USC §1232g (b)-(j) and 34 C.F.R. §99.31):

- In an emergency “ if knowledge of the information is necessary to protect the health and safety of the student or other individuals (See 34 C.F.R. §99.36(a));
- Instances of abuse or neglect;
- Mandatory reporting of communicable diseases as required by local and federal requirements;
- Disclosure to “school officials, including teachers, within the agency or institution whom the agency or institution has determined to have legitimate educational interests (§ 99.31.(1)(i)(A);
- Certain legal situations including subpoenas or investigations of criminal offenses.

Should you have any questions, please do not hesitate to call me.

Sincerely,

Catherine Decker  
Director of Admissions  
St. Coletta Special Education PCS





DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

July 21, 2021

## **Complaint Procedures for Elementary and Secondary Education Act Programs and Grants**

### **I. Authority and Purpose**

The Office of the State Superintendent of Education (OSSE) was established by the Public Education Reform Amendment Act of 2007 to “serve the state education agency and perform the functions of the state education agency for the District of Columbia.”<sup>i</sup> As the District’s State education agency (SEA), OSSE is responsible for administration of most U.S. Department of Education (USED) programs funded by the Elementary and Secondary Education Act of 1965,<sup>ii</sup> as amended by the Every Student Succeeds Act,<sup>iii</sup> collectively referred to herein as “ESEA.”

An SEA must adopt written procedures for the receipt and resolution of complaints alleging violations of the law in the administration of ESEA programs.<sup>iv</sup> The complaint process is available for parties that believe an ESEA program was not administered in accordance with federal law and regulations. Prior to submission of a written complaint, the concerned party is encouraged to first communicate concerns with the specific authority most familiar with the matter to attempt to reach a resolution (e.g., the school where the incident arose). The concerned party may also contact the OSSE office assigned to that program with questions or concerns. While OSSE encourages the concerned party to first attempt to resolve the matter informally, such attempts are not legally required, and the concerned party may always submit a written complaint using the processes outlined in this document.

### **II. Covered Programs**

The complaint procedures described in this policy apply to complaints arising from and related to the following ESEA programs as they are administered by the District of Columbia, including:

1. Title I, Section 1003: School Improvement
2. Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)
3. Title I, Part D: Prevention and Intervention Programs for Children and Youth Who are Neglected, Delinquent, or At-Risk
4. Title II, Part A: Supporting Effective Instruction
5. Title III, Part A: Language Instruction for English Learners and Immigrant Students
6. Title IV, Part A: Student Support and Academic Enrichment Grants
7. Title IV, Part B: 21<sup>st</sup> Century Community Learning Centers

### **III. What Types of Complaints**

The types of complaints that may be filed regarding ESEA programs are outlined below, as well as the corresponding filing deadline.

## **1. Program Administration Complaint**

ESEA establishes several different funding programs. The non-fiscal, programmatic requirements for each funding program are found, first, in the language of ESEA itself. For some funding programs, USED has also promulgated program-specific regulations (e.g., 34 CFR Part 200, the implementing regulations for Title I). Finally, USED's General Administrative Regulations (EDGAR) establish general programmatic regulations that are applicable to all of USED's funding programs.<sup>v</sup> These laws and regulations form the parameters to which OSSE, as the State education agency with oversight responsibility for state-administered federal funding programs, and OSSE's subgrantees, as recipients of federal financial assistance, must conform.

A *Program Administration Complaint* alleges that the SEA, LEA, or another recipient of state-administered federal financial assistance violated one of the programmatic requirements established by federal statute or federal regulation during the administration of an affected program. These complaints may be filed by any person or entity, including parents, teachers, school officials, LEA officials, organizations, and members of the public. A program administration complaint must be filed within 90 calendar days after the end date of the grant project period, as indicated in the grant award notice.

## **2. Subgrant Administration Complaint**

OSSE, as the SEA, is responsible for grant-making activities.<sup>vi</sup> The State Superintendent, as the chief state school officer, is responsible for representing OSSE and the District of Columbia in all matters before ED.<sup>vii</sup> As a result, OSSE administers all of USED's State-administered grant programs.<sup>viii</sup>

Grant administration is governed by EDGAR. These rules establish how USED awards grants to SEAs, how SEAs make subgrants to eligible applicants, and the requirements that apply after a grant award has been made. A Subgrant Administration Complaint alleges that during the administration of a grant under a covered program, the SEA took one of the following actions in violation of federal or District statute or regulation:

- a. Disapproved or failed to approve an application or program in whole or part.<sup>ix</sup> Please note that grant applications that are not accepted for filing by OSSE due to failure to comply with the technical requirements of a Request for Application (RFA) are not subject to approval or denial.
- b. Failed to provide funds in amounts in accordance with the requirements of statutes and regulations,<sup>x</sup> including but not limited to:
  - i. Failure to provide statutory formula allocation;
  - ii. Suspension or temporarily withholding of payment of grant funds under an approved subaward pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the pass-through entity;<sup>xi</sup>
  - iii. Disallowance of all or part of the costs of an activity under an approved subgrant award based on any non-compliance finding by OSSE;<sup>xii</sup>

- c. Ordered, in accordance with a final State audit resolution determination, the repayment of unallowable or misused Federal funds;<sup>xiii</sup>
- d. Terminated further assistance under an approved subgrant award,<sup>xiv</sup> including the withholding of further Federal awards;<sup>xv</sup>

A Subgrant Administration Complaint may only be filed by an organization upon receiving notice from OSSE of its intent to take one or more of the proposed actions listed above. A Subgrant Administration Complaint must be filed within thirty calendar (30) days of the date on which the SEA proposed to take any of the actions listed above.<sup>xvi</sup>

Though this policy applies to ESEA programs only, an organization may file a Subgrant Administration Complaint for any federal grants administered by the USED for which OSSE is the pass-through entity, including without limitation the Individuals with Disabilities Education Act and the McKinney-Vento Homeless Assistance Act.

### **3. Equitable Services**

In the District of Columbia, the requirement to provide equitable services is not applicable to all recipients of federal financial assistance. With the District of Columbia School Reform Act of 1995 (SRA)<sup>xvii</sup>, Congress established the public charter school system for the District. Seeking to encourage educational innovation, the SRA provides public charter schools with a good deal of autonomy. Despite this autonomy, the SRA requires charter schools to comply with all provisions of ESEA that are not specifically waived by the SRA.<sup>xviii</sup> The purpose for these exemptions is to prevent duplicative requirements addressed in both the ESEA and SRA, or to eliminate compliance with ESEA requirements that would conflict with the congressional scheme designed for DC public charter schools in the SRA. This means that regulations promulgated, or policies adopted by OSSE to implement the ESEA are applicable to charter schools receiving ESEA funds, unless a regulation or policy addresses a requirement of ESEA that has been specifically exempted from applicability to charter schools.

Charter schools in the District of Columbia are exempted from ESEA section 1117, which requires an LEA to provide equitable Title I, Part A services to children attending a private school in the area served by the LEA.<sup>xix</sup> Charter schools are also exempt from the equitable services requirements for Titles II-A, III-A, and IV-A. Charter schools have been exempted from this requirement because District charter schools are not defined by geographic jurisdictions. Instead, District charter schools enroll students from across the District of Columbia. This means that the only LEA in the District that has a geographic jurisdiction, and the related requirement to provide equitable services to students attending private schools in its jurisdiction, is the District of Columbia Public Schools (DCPS). With respect to the 21<sup>st</sup> CCLC program under Title IV-B, guidance from the U.S. Department of Education provides that a public school or other public or private organization that receives the competitively awarded 21<sup>st</sup> CCLC grant must provide equitable services to private school students and their families. (See [21<sup>st</sup> Century Community Learning Centers Non-Regulatory Guidance](#) (February 2003).) This includes public charter schools. A sub-recipient of this grant meets this requirement by providing comparable opportunities for the participation of both public and private school students in the area served by the sub-recipient.



DCPS and private schools engage in regular, ongoing consultation with respect to the provision of equitable services under ESEA entitlement grant funds.<sup>xx</sup> Meaningful ongoing communication between all parties is crucial. OSSE expects that most differences can be resolved by ongoing consultation without OSSE intervention.

With respect to Title I-A, a private school official shall have the right to file a complaint with the SEA asserting that DCPS did not engage in consultation that was meaningful and timely, did not give due consideration to the views of the private school official, or did not make a decision that treats the private school students equitably as required by law.<sup>xxi</sup> A private school official wishing to file a complaint shall provide the basis of the complaint to OSSE, and DCPS shall forward the appropriate documentation to OSSE.<sup>xxii</sup> OSSE shall resolve the complaint within 45 calendar days.

Section 8503 of the ESEA provides for complaints to be filed with the SEA under other programs providing equitable services (in the District, namely Title II-A, Title III-A, Title IV-A, and Title IV-B) by a parent, teacher, or other individual or organization.<sup>xxiii</sup> OSSE shall resolve the complaint within 45 calendar days. The resolution may be appealed by the interested party to USED not later than 30 calendar days after OSSE resolves the complaint or fails to resolve the complaint within the 45-day time limit. The appeal shall be accompanied by a copy of OSSE's resolution, and, if there is one, a complete statement of the reasons supporting the appeal. USED shall investigate and resolve the appeal not later than 90 calendar days after its receipt of the appeal.<sup>xxiv</sup> In addition, any dispute regarding low-income data for private school students under Title I-A shall also be subject to the complaint process of Section 8503.<sup>xxv</sup>

The time limit by which a complaint for equitable services shall be filed with OSSE is 90 calendar days from the end date of the grant project period, as indicated in the grant award notice. The procedures for filing an equitable services complaint with OSSE are set forth in Section IV of this policy.

In addition, to ensure that private school children, teachers, and other educational personnel receive services equitable to those in public schools, OSSE has designated an ombudsman to monitor and enforce the equitable services requirements. The ombudsman is the primary point of contact for responding to and resolving any complaints regarding equitable services that the SEA receives under its ESEA complaint procedures. OSSE's equitable services ombudsman is:

Linda Sun  
Director, Federal Programs and Strategic Funding  
Division of Systems and Supports, K-12  
Office of the State Superintendent of Education (OSSE)  
1050 First Street, N.E., 5th Floor  
Washington D.C. 20002  
(202) 230-1166  
Linda.Sun1@dc.gov

#### **IV. Where and How to File a Complaint**

## **1. Subgrant Administration Complaints**

The subgrant administration complaint process is as follows:

**a. OSSE gives the organization notice of its subgrant administrative decision.**

**b. Appeal Procedure.**

- i. After OSSE has given an organization notice of its administrative decision, an organization that alleges a violation of District or Federal statute or regulation governing the federal program, may file a Subgrant Administration Complaint to appeal OSSE's decision within 30 calendar days after receipt of such decision.
- ii. An organization shall email its complaint to OSSE's ESEA Complaints point of contact at [Kirstin.Hansen@dc.gov](mailto:Kirstin.Hansen@dc.gov). The complaint shall state the disagreement with the determination by OSSE, the facts upon which the complaint is based, and the alleged violation of District or Federal law or regulation.
- iii. Upon receipt of the complaint, OSSE will assemble a three-member panel that will review the complaint. The panel will consist of three persons from OSSE who did not have a role in the subgrant administrative decision and who do not have an interest in the outcome of the appeal.
- iv. Within five calendar days of receipt of the complaint, OSSE will acknowledge receipt of the complaint and provide the following:
  - The names of the three-member panel;
  - A schedule of proceedings; and
  - Notice that the organization may request all records of the agency pertaining to the appeal.
- v. OSSE will provide a written response to the complaint for review by both the organization and the three-member panel within ten calendar days of receipt of the organization's complaint.
- vi. Within five calendar days of receipt of OSSE's written response, the organization may request to present its argument orally. Additionally, based on its review of the organization's complaint and OSSE's response, the three-member panel may require an evidentiary hearing to resolve a material fact in dispute.
- vii. The panel will schedule any oral argument or evidentiary hearing within thirty calendar days of receipt of the complaint. The organization shall receive written notice of the scheduled oral argument or hearing date at least ten calendar days prior to the hearing. The notice shall include the date, location, and time of the oral argument or hearing.
- viii. The panel will determine the length and order of presentations by the parties and determine the course of the proceedings. The panel shall take all steps necessary to conduct a fair and impartial proceeding, avoid delays, and maintain order. The organization may be represented by an attorney or other representative at the proceedings.
- ix. OSSE shall record (but not transcribe) the proceedings.
- x. If the organization or its authorized representative fails to appear at the designated time, location, and date of the hearing, the appeal shall be considered withdrawn and the hearing process terminated.

**c. Decision.**

- i. The OSSE three-member panel shall issue a written decision to the organization within ten calendar days of either the final written submission, the oral argument, or evidentiary hearing. The written decision shall include the findings of fact and reasons for the decision.
- ii. If the panel determines that OSSE's subgrant administration decision was contrary to State or Federal statutes or regulations that govern the program, then OSSE shall rescind its action.
- iii. The written decision of the panel shall be OSSE's final administrative action.

**d. Appeal.**

If OSSE does not rescind its final action, the organization may appeal to the U.S. Secretary of Education. See Section VI for instructions on how to file an appeal with the U.S. Secretary of Education.

**e. Calculating Deadlines**

- i. The day of the act or event that triggers a deadline is not included when calculating the deadline.
- ii. The last day of the deadline must be included when calculating the deadline, unless the last day falls on an OSSE non-working day.
- iii. Where the last day of a deadline falls on an OSSE non-working day, the last day for the deadline is the next day on which OSSE is open for business.

**2. Program Administration and Equitable Services**

Program administration and equitable services complaints will be resolved by OSSE as follows. An ESEA program complaint must be hand-delivered, sent via first-class mail, or emailed to OSSE's ESEA Complaints point of contact at:

Kirstin Hansen  
State Complaints Manager  
Division of Systems and Supports, K-12  
Office of the State Superintendent of Education (OSSE)  
1050 First Street, N.E., 5th Floor  
Washington D.C. 20002  
(202) 741-0274  
[Kirstin.Hansen@dc.gov](mailto:Kirstin.Hansen@dc.gov)

Equitable services complaints should be directed to OSSE's ESEA Equitable Services Ombudsman:

Linda Sun  
Director, Federal Programs and Strategic Funding  
Division of Systems and Supports, K-12  
Office of the State Superintendent of Education (OSSE)  
1050 First Street, N.E., 5th Floor  
Washington D.C. 20002  
(202) 230-1166

[Linda.Sun1@dc.gov](mailto:Linda.Sun1@dc.gov)

All program administration and equitable services complaints filed pursuant to this policy must meet the following requirements:

- a. Complaint must be in writing.
- b. Complaint filed by an organization must identify a single person to act as the complainant's representative for the purposes of resolving the complaint.
- c. Complaint must include the address of the complainant and the entity against whom the complaint is being filed.
- d. Complaint must be signed and attested to by the complainant or its representative.
- e. Complaint must include a statement of the facts upon which the complaint is based.
- f. Complaint must include a statement of the relief/SEA action being requested by the complainant.
- g. Complaint must be accompanied by all supporting documentary evidence in the possession of the complainant.
- h. Identification of the entity alleged to have violated a requirement of a federal statute or regulation that applies to a covered program.
- i. Citation of the specific federal statute or regulation alleged to have been violated.

Program administration and equitable services complaints that do not conform to the formatting requirements of this section will not be accepted by OSSE and will be returned by OSSE to the complainant. Further, objections that do not conform to these basic requirements, such as objections made informally, in-person, by telephone, and anonymously are not considered complaints and are not subject to the procedures described herein.

## **V. Resolution of Program Administration and Equitable Services Complaints**

### **1. Calculating Deadlines**

- a. The day of the act or event that triggers a deadline is not included when calculating the deadline.
- b. The last day of the deadline must be included when calculating the deadline, unless the last day falls on an OSSE non-working day.

- c. Where the last day of a deadline falls on an OSSE non-working day, the last day for the deadline is the next day on which OSSE is open for business.

## **2. Providing Copies of Complaints**

- a. For complaints against OSSE, providing additional copies of the complaint is not required because OSSE will have notice of the complaint upon filing. Instructions on how to file a Program administration or equitable services complaint are found at Section IV.2 of this policy.
- b. For complaints against an LEA, a school, or other recipient of federal financial assistance of a covered program, the subject of the complaint will have no knowledge of the complaint until they are provided with a copy of the complaint by the person filing the complaint. For that reason, copies of Program Administration and Equitable Services complaints alleging violations by an entity other than the SEA must be provided to the entity that is alleged to have violated a covered program.
- c. Copies of the complaint must be provided by sending an exact copy of the document to the other party, or their representative, at their official place of business or residence via hand delivery or first-class mail within two (2) business days of the date on which the complaint was filed with OSSE. Any document submitted with the complaint must be provided to all other parties named in the complaint.

## **3. Continuances/ Extensions**

- a. Extensions and continuances of deadlines established by this policy may only be granted if exceptional circumstances exist.
- b. A party seeking a continuance or extension of a deadline shall file a request with OSSE using the same process for filing a program administration or equitable services complaint. The request must describe the exceptional circumstances and how those circumstances warrant a continuance or extension.
- c. OSSE may, at its discretion, extend or continue a deadline based on exceptional circumstances of the SEA *sua sponte*.<sup>xxvi</sup> OSSE shall issue a notice to the parties describing the exceptional circumstances and how those circumstances warrant a continuance or extension.

## **4. Responding to a Complaint**

- a. An entity who is alleged in a complaint to have violated a covered program may submit a response to the complaint along with any supporting documentary evidence within ten (10) business days of the date on which OSSE sent notice to the entity that a state-level complaint was filed alleging a violation of a covered program by the entity. The responding

entity shall be referred to as the respondent. Responses shall be filed with OSSE using the same procedure described in Section IV.2 of this policy.

- b. The respondent shall also provide a copy of the response to the complainant no more than two (2) business days after submitting a response to OSSE.
- c. For any complaint in which a response is not timely submitted, OSSE will resolve the complaint based on the documentary evidence submitted by the complainant and the results of OSSE's investigation, if deemed necessary.

## **5. Investigation**

- a. Upon receipt of a complaint and response, or upon expiration of the time to submit a response if no response is received, OSSE will review the information provided and determine, at its discretion, whether on-site investigation is necessary to permit OSSE to resolve the complaint.
- b. If deemed necessary, OSSE shall notify the complainant of the date and time for the on-site investigation in the Letter of Acknowledgment [section 6(a)]. Such on-site investigation shall be completed within 30 business days of the date of the Letter of Acknowledgement.
- c. Failure to comply with an OSSE investigation of a complaint filed pursuant to this policy will result in enforcement action, up to and including resolution of the complaint based solely on the evidence provided in the complaint, withholding of funds, and withholding of further awards.
- d. Upon receipt of an ESEA Equitable Services complaint, if the complaint filed alleges a violation of District or Federal law by any OSSE employee involved in the implementation and oversight of the ESEA programs, the ESEA Equitable Services Ombudsman will recuse herself or himself and the appointed ESEA Complaints Point of Contact will be responsible for investigating and resolving the complaint.

## **6. Letter of Acknowledgment, Letter of Decision and Corrective Action Plan**

### **a. Letter of Acknowledgement**

OSSE shall issue a Letter of Acknowledgment to the complainant within 10 calendar days of receipt of the written complaint. This letter will contain the following information:

- The date the complaint was received by OSSE;
- A brief statement of how OSSE will resolve the complaint, including an on-site investigation if deemed necessary;
- If necessary, a request for additional information regarding the complaint; and
- The name and phone number of a contact person for status updates.

## **b. Letter of Decision**

OSSE will issue a Letter of Decision to the complainant and respondents within 90 days of the filing of the complaint, except in the case of complaints regarding equitable services – which shall be resolved by OSSE within 45 days. (See section III.3 of this policy.)

If the Letter of Decision indicates that a violation has been found, corrective action will be required and timelines for completion will be included. A corrective action plan submitted in response to a Letter of Decision shall be subject to OSSE approval. OSSE shall provide notice to the respondent if the corrective action plan is disapproved. Such notice shall be accompanied by a written explanation of the deficiencies and specific instructions for amending the corrective action plan to obtain OSSE approval.

The Letter of Decision shall be in writing and shall include the following elements:

- Findings of fact upon which the decision is based;
- Conclusions of law;
- Relief ordered; and
- Instructions on how to appeal the Letter of Decision, as applicable.

The Letter of Decision shall be OSSE's final agency action.

## **VI. Appeal to the U.S. Department of Education**

For Subgrant Administration Complaints, complainants or respondents may request a review of the decision by the Secretary of USED As described in section III.3 of this policy, for certain equitable services complaints, an appeal may be made to USED if OSSE has either issued a Letter of Decision or failed to do so within 45 calendar days. Appeals to USED shall be in writing and shall include a complete statement of the reasons underlying the request for review and shall be accompanied by a copy of OSSE's decision, as applicable.<sup>xxvii</sup>

The complainant may send the request with all supporting documents via first class mail to the following address:

Secretary, United States Department of Education 400  
Maryland Avenue SW  
Washington, D.C. 20202-4611

The following are the deadlines for filing an appeal to ED depending on the type of ESEA complaint:

- a. An appeal of an OSSE decision regarding a Subgrant Administration Complaint shall be filed within twenty (20) calendar days after notice of the decision.<sup>xxviii</sup>
- b. An appeal of a Letter of Decision (or failure of OSSE to issue a Letter of Decision within the required 45 day time period) regarding an equitable services complaint governed by ESEA

Section 8503 shall be filed with ED within thirty (30) calendar days after notice of the Letter of Decision.<sup>xxix</sup>

## **VII. Complaint Reporting, Recordkeeping, and Notice**

All LEAs are required to disseminate, free of charge, adequate information about these complaint procedures to parents of students and to appropriate school officials and representatives.<sup>xxx</sup>

OSSE will maintain complete records of the resolution of each complaint that is properly filed pursuant to this policy for five (5) years from the date on which the complaint is resolved, including any appeals.

## **VIII. Definitions**

Unless otherwise defined herein, the terms used in this policy shall have the definitions ascribed to them by EDGAR or in the authorizing statute of an affected program.

*“Complainant”* means the party filing a complaint.

*“Findings of fact”* means a concise statement of the conclusions upon each contested issue of fact that is supported by reliable, probative, and substantial evidence.

*“LEA”* means the District of Columbia Public Schools and any District of Columbia public charter school.

*“Non-working day”* means a day on which the Office of the State Superintendent of Education is not open for business, and which does not include Saturdays, Sundays, Federal holidays, District of Columbia government holidays, and emergency closing days.

*“Office of the State Superintendent of Education”* or *“OSSE”* means the District of Columbia Government state education agency established by the Public Education Reform Amendment Act of 2007, effective Jun. 12, 2007 (D.C. Law 17-9, 54 D.C. Reg. 4102, as codified at D.C. Official Code § 38- 2601).

*“Party”* or *“Parties”* means either the complainant or the respondent individually, or the complainant and respondent collectively.

*“Respondent”* means the party against whom a complaint was filed.

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<sup>i</sup> D.C. Code § 38- 2601.01. The majority of ESEA programs are state-administered. However, several ESEA programs are directly granted by ED to local educational agencies, community-based organizations, or other state agencies. OSSE does not directly administer or oversee such direct grants.

<sup>ii</sup> 20 U.S.C. § 6301 *et seq.*

<sup>iii</sup> Public Law 114-95, enacted December 10, 2015.

<sup>iv</sup> 20 U.S.C. 7844



<sup>v</sup> EDGAR is comprised of regulations at 34 CFR Parts 75, 76, 77, 79, 81, 82, 84, 86, 97, 98, 99, 2 CFR Parts 200 and 3474 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards), and 2 CFR Parts 180 and 3485 (Non-procurement Debarment and Suspension)

<sup>vi</sup> D.C. Code § 38-2601.01.

<sup>vii</sup> D.C. Code § 38- 2601(c).

<sup>viii</sup> ESEA establishes several grant programs that are not administered by the State. These are direct grant programs, which are directly awarded by the Secretary of the U.S. Department of Education to an educational entity, are not subject to OSSE oversight, and are not included in the list of affected programs in Section II of this policy.

<sup>ix</sup> 20 U.S.C. § 1231b-2(a).

<sup>x</sup> 20 U.S.C. § 1231b-2(a).

<sup>xi</sup> 2 CFR § 200.339(a), (c).

<sup>xii</sup> 2 CFR § 200.339(b).

<sup>xiii</sup> 20 U.S.C. § 1231b-2(a).

<sup>xiv</sup> 20 U.S.C. § 1231b-2(a).

<sup>xv</sup> 2 CFR § 200.339(e).

<sup>xvi</sup> 20 U.S.C. § 1231b-2(a).

<sup>xvii</sup> D.C. Code § 38-1800 *et seq.*

<sup>xviii</sup> D.C. Code § 38- 1802.10(a)(5).

<sup>xix</sup> D.C. Code § 38-1802.10(a)(6)(D).

<sup>xx</sup> 20 U.S.C. § 6320(b)(1).

<sup>xxi</sup> 20 U.S.C. § 6320(b)(6)(A)

<sup>xxii</sup> 20 U.S.C. § 6320(b)(6)(B)

<sup>xxiii</sup> 20 U.S.C. § 7883(a).

<sup>xxiv</sup> 20 U.S.C. § 7883(b).

<sup>xxv</sup> 20 U.S.C. § 6320(c)(2)

<sup>xxvi</sup> *Sua sponte* is a legal term and means “of one’s own accord; voluntarily.” It is used to indicate that a court has taken notice of an issue on its own motion without prompting or suggestion from either party.

<sup>xxvii</sup> 20 U.S.C § 1231b-2; 20 U.S.C. § 7883(b).

<sup>xxviii</sup> 20 U.S.C. § 1231b-2(b).

<sup>xxix</sup> 20 U.S.C. § 7883(b).

<sup>xxx</sup> 34 CFR § 299.12(d).



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

### **Annual Notification of Parental Medicaid Consent**

This notice serves to inform parents of children receiving special education services of the consent requirements regarding access to Medicaid and other public benefits. Federal regulations pursuant to the Individuals with Disabilities Education Act (IDEA) allow public agencies to use Medicaid and other public benefits in which a child participates to pay for qualifying special education services. The regulations require local educational agencies (LEAs) and other public agencies to obtain parental consent the first time that a Medicaid claim for reimbursement is submitted and to also provide this notice the first time and annually thereafter.

The Office of the State Superintendent of Education (OSSE) and your LEA are eligible to receive federal Medicaid reimbursement for certain health related services provided to your child pursuant to your child's IEP. Medicaid funds may be used to help pay for these special education related services when they meet state Medicaid requirements and are provided in accordance with your child's IEP. Health related services may include the following:

- Audiology Services/Assessment
- Behavioral Support Services
- Nutrition
- Occupational Therapy/Assessment
- Speech-Language Pathology Services/Assessment
- Orientation and Mobility/Assessment
- Physical Therapy Services/Assessment
- Psychological Evaluation
- Skilled Nursing Services
- Special Education Transportation Services

In order for OSSE or your LEA to receive federal reimbursement for these services, information about your child must be submitted to the District of Columbia Department of Health Care Finance (DHCF), which coordinates reimbursement claims for Medicaid benefits. Information about your child cannot be sent to DHCF without your prior consent. Please note that if your consent is provided, DHCF would not be allowed to use information about your child for any purpose other than Medicaid reimbursement for health related services and is required by law to keep your child's information confidential.

### **Parental Consent to Bill Medicaid**

If you have previously given consent to OSSE or your LEA to access your child's or your public benefits or insurance to pay for health related services under IDEA, OSSE and the LEA are not required to obtain a new consent from you if the following two conditions are present:

1. There is no change in any of the following: the type of services to be provided to your child, the amount of services to be provided to your child (for example, hours per week lasting for the school year); or the cost of the services and
2. OSSE or your LEA has on file the consent you previously provided.

Though OSSE and your LEA are not required to obtain a new consent from you under the conditions outlined above, you will still receive this notification annually before OSSE or your LEA submits a claim for reimbursement from your public benefits or insurance program to pay for health related services (at no cost to you).

If OSSE or your LEA has not previously accessed your public benefits or insurance to pay for health related services that they provided to your child under IDEA at no charge to you or your child, they must first obtain your signed and dated written consent. OSSE or your LEA will provide you with a consent form for you to sign and date. Remember that OSSE and your LEA are only required to obtain your consent one time. The consent requirement has two parts:

1. Consent for disclosure of your child's personal identifiable information and records regarding the delivery of health related services to the state agency responsible for administering your state's public benefits or insurance program (i.e., DHCF) for the purpose of claiming reimbursement; and
2. A statement specifying that you understand and agree that OSSE or your LEA, as appropriate, may use your or your child's public benefits or insurance to pay for health related services under the IDEA.

#### **Parental Rights:**

- You are not required to enroll in Medicaid or any other public benefit program in order for your child to receive special education services, including health related services.
- You are not required to incur out-of-pocket expenses incurred in filing a claim for services.
- Neither OSSE nor your LEA will use Medicaid if that use would: (I) Decrease the available lifetime coverage or any other insured benefit; (II) Result in any cost to your family; (III) Increase premiums or lead to the discontinuation of benefits or insurance; or (IV) Risk any loss of your child's eligibility for home and community-based waivers, based on aggregate health-related expenditures.
- You have the right to withdraw your consent at any time, in writing, to the disclosure of personal identifiable information to DHCF.
- Your withdrawal of consent or your refusal to provide consent will not prevent your child from receiving special education services at the expense of OSSE or your LEA, including health related services.

Upon written request, you or your child may receive a copy of the information shared with DHCF.

**CONTACT INFORMATION:**

For additional information and guidance on the requirements governing the use of public benefits or insurance to pay for special education and related services see:

<http://www2.ed.gov/policy/speced/reg/idea/part-b/part-b-parental-consent.html>

For any questions or comments, please feel free to contact the OSSE Medicaid Unit by email or feel free to send us a letter.

**Email:** Medicaid.OSSE@DC.gov

**Mailing Address:**

Government of the District of Columbia

Office of the State Superintendent of Education

Division of Elementary, Secondary, and Specialized Education- Medicaid Recovery Unit

810 First Street, NE 5<sup>th</sup> Floor

Washington, DC 20002

St. Coletta School serves students with significant disabilities, which may include students that present with behavior challenges. All students are managed on an individual basis to determine the level of supports and/or consequences required to address severe behaviors that may disrupt the classroom environment or put themselves and/or others at risk of harm. While a majority of behaviors are able to be addressed through the use of positive behavior supports, there are instances when alternate consequences, such as suspension, are deemed necessary.

## **PROCEDURE**

### **Positive Behavior Supports**

It is the philosophy of St. Coletta School to foster productive student behavior. Toward this goal, staff are expected to provide: clear rules for student conduct; collegiality among staff members; a pervasive caring for students; effective instruction; and a focus on providing positive reinforcement and options for students.

Effective methods for responding to disruptive student behavior include:

- \*Using positive redirection and reinforcement whenever appropriate.
- \*Developing positive personal relationships with students that indicate high teacher expectations and respect for students.
- \*Closely monitoring performance and behavior.
- \*Using brief, non-disruptive interventions.
- \*Handling conflicts calmly and avoiding engaging in power struggles.
- \*Clarifying students' choices so that options are clear and students are responsible for the consequences of their choices.
- \*Using effective listening skills to help students identify problems and gain insight.

When students exhibit serious behavioral difficulties such as aggression, self-injury, significant property destruction and elopement (running away), a Functional Behavior Assessment (FBA) and Positive Behavior Support Plan (PBSP) may need to be developed. The development process should include the multidisciplinary team involved with the student and the following six steps:

- \*Attempt to determine the function(s) of the behavior through an FBA;
- \*Focus on one or two specific student behaviors that need to change in order for the student to have a successful school experience;
- \*Determine specific interventions to bring about these changes;
- \*Assign responsibility to staff for implementing each intervention;
- \*Determine the data to be collected to test the effectiveness of the intervention; and,
- \*Review the program at a minimum annually, or as determined by the IEP team.

Copies of the FBA and BIP are discussed with and given to parents/guardians and affected staff. A copy is placed in the student's record.

St. Coletta staff members are trained in the Mandt System. All staff receive training in the Relational Section (Building Healthy Relationships, Communication, and Conflict Resolution). Depending on the specific needs of the school program, selected staff members receive training in the Conceptual and Technical Sections (Medical Risks of Restraint, Assisting and Supporting, Separating and Restraining.) Only staff members trained in the Conceptual and Technical level are allowed to intervene using this system. The Mandt System teaches a graded system of interventions, beginning with non-physical options and gradually moving towards physical options.. Physical intervention is used only as a matter of last resort when someone is a danger to themselves or others and the attempted non-physical interventions have not been successful. Parents must be notified if a restraint is utilized and a behavior plan must be developed.

There are Quiet Rooms at St. Coletta that are available for students to use if they need to calm themselves. These rooms are unlocked and students are never left alone. Use of the Quiet Room requires that an administrator be notified, an incident report be written and the parent notified and provided a copy of the incident report. St. Coletta policy prohibits the use of mechanical and chemical restraints.

The St. Coletta School Behavior Management Plan **strictly prohibits:**

- Deprivation of drinking water or food necessary to meet daily nutritional needs.
- Denial of the use of toilet facilities.
- Any action humiliating, degrading or abusive.
- Deprivation of health care including counseling.
- Intrusive aversive therapy.
- Use of mechanical restraints, chemical restraints, or seclusion.

Corporal punishment will never be administered by any staff person. If abuse or neglect is suspected, the school will contact Child Protective Services (CPS). Before CPS comes, a parent/guardian must be notified. If the parent/guardian objects, the child will not be interviewed. This does not apply if the parent/guardian is the suspect. In such a case, CPS may interview the child without consent from the parent or guardian.

#### **Student Suspension/Disciplinary Unenrollment/Emergency Removal**

While St. Coletta School is dedicated to serving students with challenging behaviors by providing intensive behavior supports, there may be incidents where suspension is deemed necessary. All cases are determined on a student by student basis and take into consideration their specific circumstances such as cognitive skill level and social awareness. In some situations suspension/disciplinary unenrollment is deemed necessary if the safety of others or the student involved is put at risk. Dependent on the seriousness of the offense and/or danger to others, outside authorities may also be contacted and the Public Charter School Board notified.

St. Coletta School employs the following levels of suspension:

#### **Level I:**

**In School Disciplinary Action:** disciplinary actions to include exclusion from school common areas and required participation in conflict resolution or peer mediation sessions, or similar actions of short duration that do not result in the student's loss of academic instruction time.

**OR**

**In-House suspension:** When a student continues to attend school with provisions made to their program that includes 1:1 supervision and suspension of all community outings. Instruction and related services will be conducted in a designated environment separate from the student's classroom.

#### **Level II:**

**Short Term Out of school suspension:** When a student is to remain home for the duration of the suspension to exceed no more than 5 school days. Students in KG through grade 5 cannot be suspended for a period greater than 5 days.

#### **Level III:**

**Long Term Suspension/ Disciplinary Unenrollment/Emergency Removal:** When a student is suspended out of school for a period of 6 consecutive school days or more (for students in grades 6 through 12 only). Students cannot be suspended for more than 10 consecutive days.

This level of suspension is reported to appropriate school jurisdictions and, by the 10<sup>th</sup> day of suspension or if a disciplinary unenrollment has been recommended, a manifestation determination meeting must be held to determine the relationship of the behavior to the disability

of the student, update or create behavior plans/functional behavior assessments and possibly determine an alternate placement.

**Behaviors Resulting in Suspension include but are not limited to:**

**Level I:**

- \*Fighting
- \*Stealing
- \*Smoking
- \*Intentionally destroying school property
- \*Threatening others with bodily harm
- \*Running away from staff in the community

**Level II:**

- \*Drugs on premises
- \*Alcohol on premises
- \*Possession of a dangerous object
- \*Causing bodily harm to others

**Level III:**

- \*Possession of weapons
- \*Significant aggressive/destructive behavior posing an immediate threat of severe injury to others and/or self

In accordance with the Student Fair Access to School Amendment Act of 2018, no student in grades kindergarten through 5 shall be subject to an out-of school suspension or disciplinary unenrollment, unless a school administrator determines that the student has willfully caused, attempted to cause, or threatened to cause bodily injury or emotional distress, to another person.

**Process for Notification of Suspension:**

Once an infraction has been reported, the student(s) will meet with a school administrator to discuss their side of the incident. Incident reports will be written and submitted to the school administrator by witnesses of the incident.

In the event of a suspension/disciplinary unenrollment recommendation, parents/guardians will be informed immediately via telephone call (see also **Long Term Suspension Due Process Procedures** below). If parents/guardians are unable to be contacted, the student will be sent home with a letter of suspension/disciplinary unenrollment to be signed with a request that the letter be signed and returned. Parents/guardians and/or students, if they are 18 and their own guardian, will also be notified via certified mail and phone of this decision (preferably immediately as noted above), but no later than within 24 hours of the suspension/disciplinary unenrollment. In the case of a short term suspension, parents/guardians or students who are their own guardians will be extended the opportunity to meet with school administrators and can request to appeal the short-term suspension decision. The request for an appeal or a hearing can be made to the Principal or an Assistant Principal. This appeal will be reviewed by the school's discipline committee.

**Long Term Suspension Due Process Procedure**

If a suspension equaling more than six consecutive or cumulative days over the school year occurs, or an disciplinary unenrollment is recommended, then, according to the *Individuals with Disabilities Improvement Act (IDEIA)*, a Manifest Determination and placement review IEP meeting must be held. In addition, all disciplinary unenrollment recommendations must be made by the Principal or in their absence, appropriate designee (Assistant Principal) and communicated as required to the St. Coletta Public Charter School Board. A Manifest Determination Meeting, per DCPS and other jurisdictional regulations, will be scheduled within ten days. Further steps taken will be determined by the IEP team at the Manifestation Determination meeting. Parents

and/or students also have the right to have an advocate or attorney present at any Disciplinary Unenrollment/Emergency Removal hearing or meeting.

The St. Coletta Public Charter School Board reviews all suspensions at each board meeting and can make recommendations regarding policy. Suspensions extending beyond 5 school days and disciplinary unenrollments are also required to be reported to the DC Public Charter School Board. Parents and/or students have the right to appeal any decision to the school's discipline committee or the St. Coletta Public Charter School Board. Disciplinary Unenrollment/Emergency Removal recommendations will be reported immediately to the St. Coletta Special Education Public Charter School Board chairperson and the CEO of St. Coletta of Greater Washington.



### **Philosophy**

St. Coletta of Greater Washington is committed to ensure the safety of all students by encouraging a school climate where everyone is free to learn. Students who are bullied and those who bully others are at a significant risk of health, safety and educational risks.

### **Policy**

It is the policy of St. Coletta of Greater Washington to prohibit bullying, harassment or intimidation of any person on school property, school-sponsored functions, while in transit to school or school-sponsored functions, or by the use of electronic technology. Using electronic technology to bully includes any incident that occurs on school property with school technology, or that otherwise adversely affect a student's ability to participate or benefit from the school's educational programs or activities. It is also the policy to prohibit reprisal or retaliation against anyone who reports reliable information about acts of bullying, harassment, or intimidation or who are victims.

As used in this policy, "bullying" means any severe, pervasive, and persistent act or conduct whether physical, electronic, or verbal that:

1. May be based on youth's actual or perceived race, color, ethnicity, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, intellectual ability, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, status as a victim of intrafamily offense, place or residence of business, or any other distinguishing characteristic, or on a youth's association with a person, or group with any person, with one or more of the actual or perceived foregoing characteristics; and
2. Can reasonably be predicted to:
  - a. Place the youth in reasonable fear of physical harm to his person or property;
  - b. Cause a substantial detrimental effect on the youth's physical or mental health;
  - c. Substantially interfere with the youth's academic performance or attendance; or,
  - d. Substantially interfere with the youth's ability to participate in or benefit from the services, activities, or privileges provided by an agency, educational institution, or grantee.

"Electronic communication" means a communication transmitted by means of an electronic device, including but not limited to a telephone, cellular phone, computer, or pager.

“Harassment” means perceived or actual experiences of discomfort with identity issues in regard to race, color, national origin, gender, disability, sexual orientation, religion, or other identifying characteristics by a student which adversely affects that student’s ability to participate in or benefit from the school’s educational programs or activities.

“Intimidation” means subjection of a student to intentional action that seriously threatens and induces a sense of fear and/or inferiority which adversely affects that student’s ability to participate in or benefit from the school’s educational program or activities.

“Retaliation” means an act of reprisal or getting back at a person for an act he /she has committed.

### **Procedure**

This policy will be made available within the front office. Additionally, it will be distributed to staff and students annually and students and staff will be reminded that these policies extend to school sponsored functions.

### **Code of Conduct**

St. Coletta School serves students with significant disabilities, which may include students that present with behavior challenges. All students are managed on an individual basis to determine the level of supports and/or consequences required to address severe behaviors that may disrupt the classroom environment or put themselves and/or others at risk of harm.

### **Prevention**

All school staff will participate in annual professional development to increase awareness of the prevalence, causes, and consequences of bullying and to increase the use of evidence-based strategies for preventing bullying, as well as the procedure for reporting incidences of bullying. Additional professional development may be provided for new employees who are hired after the start of the school year.

Students will participate in learning about their rights to an environment free from bullying and the appropriate responses.

All school staff will promote student involvement in the anti-bullying efforts, peer support, mutual respect, and a culture which encourages students to report incidents of bullying to adults.

### **Procedure for Reporting Acts of Bullying, Harassment or Intimidation**

1. Students, staff, parents, and guardians may report any incident of bullying, harassment, or intimidation to assistant principals or Lead Social Worker at 1901 Independence Ave SE, Washington, DC 20003 or at (202)350-8680.
2. Incidences of bullying may be reported anonymously; however, disciplinary action cannot be taken solely on the basis of the anonymous report. The anonymous report may trigger an investigation that will provide actionable information.
3. An employee or youth who promptly and in good faith reports an incident of, or information on, bullying in compliance with the policy of the agency, educational institution, or grantee shall be immune from a cause of action for damages arising from the report.
4. If a student complains that he/she is currently the victim of bullying, harassment, or intimidation, the staff member will respond quickly and appropriately to investigate and intervene, as safety permits.
5. If a student expresses a desire to discuss an incident of bullying, harassment, or intimidation with a staff member, the staff member will make an effort to provide the student with a practical, safe, private, and age-appropriate way of doing so.

#### Procedures for Investigation

1. All reports of bullying will be documented using the *Incident Report Form*. They must then be promptly and appropriately investigated by school administrators or the administrative designee, consistent with due process rights, using the *Incident Report Form* within 2 school days after receipt of a reporting form or as timely as possible for school administration.
2. School administrators or the administrative designee will determine whether bullying, harassment, or intimidation actually occurred by taking steps to verify who committed the act of bullying, harassment, or intimidation and whether others played a role in perpetuating this act. Other related complaints, if any, will be reviewed in making this determination.
3. Efforts will be made to ensure the safety of the alleged victim of the reported bullying incident. For instance, administrators may alter the bully's seating or schedule to reduce access to the alleged victim.
4. School administrators or the administrative designee will immediately notify parents of the victim and offender of the incident.
5. School administrators or the administrative designee will apply consequences and/or remedial actions consistent with the school's discipline policy. St. Coletta School is dedicated to serving students with challenging behaviors by providing

intensive behavior supports; however, there may be incidents where further disciplinary action is necessary. All cases are determined on a student by student basis and take into consideration their specific circumstances such as cognitive skill level and social awareness. Possible consequences include: in-school disciplinary action, in-house suspension, short term out-of-school suspension, or long-term suspension or expulsion. Please see the discipline policy for a further description of each consequence. The offender will be informed that retaliation against a victim or bystander is strictly prohibited and that progressive consequences will occur if the activity continues. These consequences may include in-school disciplinary action, in-house suspension, short term out-of-school suspension, or long-term suspension or expulsion.

6. Additionally, bullies and victims of bullying may be referred to appropriate support services, such as counseling.
7. The administrator/designee will create a written record of the bullying, harassment, or intimidation incident and any disciplinary actions taken, as well as obtain the statements of the victim, witnesses, and offender. Discussions with all parties should be documented as soon as possible after the event.
8. If parties are dissatisfied with the outcome of a bullying investigation, an appeal may be made in writing to the school's principal at 1901 Independence Ave SE, Washington, DC 20003, (202)350-8680. This appeal must be submitted no later than 30 days after the initial determination. Upon receipt of an appeal, the Principal must conduct a secondary investigation within 30 days of the receipt of the appeal. This 30 days may be extended up to an additional 15 days if the Principal sets forth in writing the reasons why more time is needed to conduct an investigation. Additionally, upon the receipt of an appeal, the Principal must inform the party making the submission of their ability to seek additional redress under the DC Human Rights Act ([ohr@dc.gov](mailto:ohr@dc.gov)) at 441 4th Street NW, Suite 570 North, Washington, DC 20001, (202)727-4559.

#### Resources:

Board of Education of Montgomery County. Montgomery County Public Schools. Special Education and Student Services. *Policy-Bullying, Harassment, or Intimidation*. <http://www.montgomeryschoolsmd.org/departments/policy/pdf/jhf.pdf>

District of Columbia. *Bullying and Intimidation Prevention Act of 2011 (B19-11)*. <http://dctranscoalition.files.wordpress.com/2011/04/dc-b19-11-one-pager-update.pdf>

District of Columbia. *District-wide Model Bullying Prevention Policy*. [http://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/DCBullyingPreventionPolicy\\_PressQ\\_022513.pdf](http://ohr.dc.gov/sites/default/files/dc/sites/ohr/publication/attachments/DCBullyingPreventionPolicy_PressQ_022513.pdf)

Prince George's County Public Schools. *Administrative Procedure (5143) - Bullying, Harassment or Intimidation (October 27, 2017)*.

[http://www1.pgcps.org/uploadedFiles/Schools\\_and\\_Centers/High\\_Schools/High\\_Point/  
Admin%20Policy%20Bullying.pdf](http://www1.pgcps.org/uploadedFiles/Schools_and_Centers/High_Schools/High_Point/Admin%20Policy%20Bullying.pdf)

## **School-Parent/Guardian Compact (PARENT COPY)**

St. Coletta Special Education Public Charter School and the parents/guardians of the students participating in activities, services, and programs funded by Title I, Part A of the Elementary and Secondary Education Act (ESEA) agree that this compact outlines how the responsibility for improved student achievement will be shared by all parties to build and develop a partnership that will help the students achieve.

This school-parent compact is in effect during the 2022-2023 school year.

### **School/Teacher Responsibilities**

St. Coletta Special Education Public Charter School will:

- 1. Provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the participating students to achieve in the school setting as follows:**
  - a. Provide specialized instruction and related services to all students in accordance with their Individualized Education Program (IEP) document.
  - b. Provide parents opportunities to discuss their child's achievement through participation in annual IEP meetings, mid-year parent-teacher conferences, scheduled observations and trainings pertinent to instructional activities for carryover between home and school.
  - c. Provide comprehensive staff development training in the area of education to promote school-wide student achievement and IEP goal progress.
- 2. Communicate with parents/guardians as follows:**
  - a. Provide written communication regarding the educational program, FLS curriculum, and teaching strategies utilized through school newsletters, the parent handbook, and Open House events.
  - b. Provide quarterly student progress reports and results of statewide testing, as appropriate.
  - c. Provide classroom specific information and via the home-school communication book.
  - d. Contact parent/guardian via phone as needed to discuss student programming, inform of upcoming events, and relay other pertinent student information.
  - e. Include updated school information and showcase school-wide activities on social media platforms.
- 3. Monitor and track student attendance.**
  - a. The school will provide information on attendance and truancy guidelines.
  - b. Attendance calls will be made when a student is absent.
  - c. The school will contact parents to discuss attendance concerns and provide information on relevant resources.
- 4. Provide parents/guardians opportunities for involvement in their child's achievement**
  - a. Parent/teacher trainings provided by the classroom teacher and/or therapists focused on specific student skills included on their IEP.
  - b. Parent trainings provided by special education teachers, therapists, and specialists on topics such as communication, behavior management, and transition planning.
  - c. Opportunities to provide input for IEPs and attend mid-year parent teacher conferences.

### **Parent/Guardian Responsibilities**

We, as parents/guardians, will support our children's learning in the following ways:

- 1. Promote my child's educational progress by:**
  - a. Being an active participant in the development of my child's IEP.
  - b. Attending and participating in IEP and eligibility meetings.
  - c. Participating in mid-year parent conferences or other meetings scheduled to discuss my child's progress.
  - d. Participating in at least one Parent Training
- 2. Regularly communicate with school in such areas as:**
  - a. Completion of necessary school documents and permission forms so that my child can fully participate in their educational program.
  - b. Inform the school and classroom teacher of any attendance issues and provide documentation as needed.
  - c. Include important information pertinent to my child for the school day through their home-school communication book.
  - d. Parent will inform school of circumstances that may impact the child's day-to-day functioning in the school program.
- 3. Ensure that my child attends school.**
  - a. I will communicate my child's absence by calling the school attendance line and provide excuses to the school in writing
  - b. I will provide documentation supporting my child's absences to the school
  - c. I will make efforts to schedule doctor and therapy appointments outside of my child's instructional hours
- 4. Be involved in school-wide events, training opportunities offered by the school and any other parent involvement opportunities, as much as possible.**

**\*\*\*Parent/Guardian- keep this copy for your records. The version titled "School Copy" should be returned to the school with the rest of the Back to School documents.**



# What's going on in the wonderful world of St Coletta?

Keep in touch to know all of the latest happenings!



Head over to  
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