**Child Abuse and Neglect:**

**Recommendations for a Redesigned Systemic Plan**

Strategic Priority Areas

**Strategic Priority Area 1: Revise the Board of Education’s policy and MCPS’ regulation on recognizing and reporting child abuse and neglect, and update them on a regular basis, to reflect current practices in the area and ensure efficient collaboration with County partner agencies.**

The Board’s Policy JHC, *Child Abuse and Neglect* (http://www.montgomeryschoolsmd.org/uploadedFiles/departments/studentservices/mentalhealth/ChildAbuseandNeglectPolicy.pdf),and MCPS’ Regulation JHC-RA, *Child Abuse and Neglect* (http://www.montgomeryschoolsmd.org/uploadedFiles/ChildAbuseandNeglectRegulations.pdf), need to drive school system procedures and protocols across a variety of domains. The broad goal of the policy and regulation must be to ensure that MCPS remains current and consistent with best practices. In doing so, both the policy and regulation must be revised and then reviewed and updated on a regular basis to benchmark against best practices in other school districts and codify the work of a new multidisciplinary team comprised of partner agencies, including MCPS, Child Welfare Services, the Montgomery County Police Department (MCPD), the State’s Attorney Office, and County Attorney Office.

Recommendations:

* 1. **Continuously review and update guidelines for staff certification on recognizing and reporting child abuse**. The guidelines would include a mandatory assurance certificate and assessment that all employees will be required to complete at the start of each new school year to confirm up-to-date knowledge and understanding of protocols for recognizing and reporting child abuse and neglect.
	2. **Codify new protocols for coordinating MCPS’ response to reports of child abuse or neglect, both internally and with County partner agencies, which reflect best practice**. The new protocols will be incorporated into an updated memorandum of understanding with County partner agencies to establish a multidisciplinary team approach to investigations and communications. The protocols will also clarify that it is not the role of MCPS to investigate or determine the validity of suspected abuse or neglect, prior to making a report to Child Protective Services (CPS) or the MCPD.  Thus, MCPS employees shall not collect written statements or interrogate alleged victims, witnesses or suspects, prior to making a report. And after alleged abuse or neglect is reported, MCPS will conduct internal investigations only after consulting with County partner agencies to avoid interfering with those agencies’ pending investigations.
	3. **Establish school-based and system-wide child abuse liaisons.** These liaisons will receive additional training to develop institutional subject matter expertise and help coordinate a team-based approach among MCPS offices and departments to support schools in responding to abuse and neglect, in partnership with other County agencies.
	4. **Redesign the reporting process to inform the Board of Education regarding cases of suspected child abuse and neglect**.

**Strategic Priority Area 2: Enhance human resource management systems and processes to ensure robust screening of new and existing employees, volunteers, and outside contractors.**

MCPS must take steps to work towards even stronger screening processes for new and existing employees, as well as volunteers and contractors who may have access to students in circumstances where they are not under the direct supervision of MCPS staff. Currently, MCPS practices and procedures for background checks and monitoring employees are consistent with the state of the law and ensure legal compliance. For instance, Section 6-113 of the Education Article of the Maryland Code states that a county board of education may not knowingly hire or retain any individual who has been convicted of sexual abuse of a child or minor or certain crimes of violence. And Section 11-722 of the Criminal Procedure Article of the Maryland Code states that a person who enters into a contract with a county board of education may not knowingly employ a registered sex offender to work at a school. Going beyond compliance with these legal obligations, we believe MCPS should seek to implement practices that include more robust and ongoing screening and monitoring of adults serving our youth.

Recommendations:

* 1. **Conduct CPS background checks for all new and existing employees**. Under Maryland law, prospective MCPS employees must undergo fingerprint and a criminal background check. Beginning with the 2014-2015 school year hiring class, MCPS has also required a check of the central Maryland Child Protective Services database, provided through a collaborative agreement with CPS in Montgomery County. Additional resources would be required for both CPS and MCPS to expand this screening process to all current employees. In addition, we recommend fingerprinting for any employees hired before fingerprinting became a requirement for school systems in Maryland and still currently employed by MCPS.
	2. **Establish processes for updating employee background information on an ongoing basis**. Options would include rescreening procedures for existing employees and/or employee self-reporting protocols.
	3. **Utilize outside consultants to conduct comprehensive employee file reviews at all levels of the organization**. OHRD will follow up on any pertinent information regarding alleged inappropriate interactions between staff and students and consult with County partner agencies if appropriate.
	4. **Develop an employee and volunteer code of conduct**. Building on MCPS’ ethics policy and benchmarking personnel manuals and handbooks utilized by other school districts and comparable entities, the code of conduct would provide clear guidance on inappropriate conduct between staff and students.
	5. **Develop screening processes for volunteers who may have access to students in circumstances where they are not under the direct supervision of MCPS staff**. For most volunteers in MCPS schools, there is an MCPS staff member who is physically present at all times when the volunteer is in the company of students other than their own children (e.g. book fairs, guest readers, career day, speakers, competition judges, school assemblies, and other performances). Enhanced screening will focus on those volunteers who participate in activities where MCPS staff may not be present at all times while the volunteer is in the company of students other than their own children (e.g. hall monitors, tutoring, mentoring, chaperones for overnight field trips). Volunteers who are frequently or regularly in the school performing a variety of functions will typically fall into this category, as there may be times when staff is not present during the volunteer’s activity.
	6. **Develop screening processes for outside contractors who may have access to students in circumstances where they are not under the direct supervision of MCPS staff**. Under Maryland law, MCPS contractors are prohibited from knowingly employing individuals on the state’s sex offender registry. MCPS has decided to require additional background checks for all employees in a contractor’s workforce who work in school facilities and may have access to students in circumstances where they are not under the direct supervision of MCPS staff. There will be only limited exceptions for contractors who do not have access to school facilities (such as a technology vendor who does all of its work remotely or workers constructing a new school facility), or contractors who are escorted throughout a school building and directly supervised at all times by MCPS staff (such as a vendor providing emergency repairs to a school boiler or air conditioning unit).
	7. **Evaluate technology for employee file management and enhance infrastructure as necessary.**

**Strategic Priority Area 3: Design and implement updated training for all staff in accordance with the most current practices for identifying and reporting child abuse and neglect.**

Staff training is critical to ensuring the proper identification and reporting of cases of child abuse and neglect. MCPS should work with a multidisciplinary team of County agencies to redesign and enhance the professional development that staff members receive every year, as well as develop training workshops for volunteers. An annual training plan should be developed that includes processes for certifying and assessing employee completion and understanding of the training itself. In addition to County partner agencies, training sessions will feature presentations from other subject matter experts locally, such as the Tree House Child Assessment Center of Montgomery County, and nationally.

Recommendations:

* 1. **Develop annually updated training materials and a system-wide training plan in coordination with County partner agencies**. Training materials need to be updated annually, as the research and expertise on child abuse is constantly developing. We want to ensure that all employees receiving training each year that reflects the most current research and knowledge in the field.
	2. **Conduct annual training for all staff, facilitated by a multidisciplinary team, tailored specifically to meet the needs of employees at all levels of the organization**. It is expected that the enhanced mandatory training plan will be implemented for all current staff by June 2015.
	3. **Ensure that all new employees and substitute teachers complete mandatory online training prior to working with students**.
	4. **Provide child abuse workshops for school-based and school system volunteers**.

**Strategic Priority Area 4: Develop a comprehensive parent awareness program for how to identify and respond to suspected cases of child abuse or neglect.**

As partners in educating our youth, we work closely with the parents of our students to ensure child safety and well-being. We recognize the unique role MCPS, as the community’s school system, can play in raising awareness for issues of child abuse and neglect, and we want to tap into the vast network of parent activities occurring throughout the system to provide parents workshops in this important area. Through a multitude of venues, parents can and should have opportunities to develop their awareness on recognizing and reporting child abuse.

Recommendations:

* 1. **Design and implement parent academies on child abuse and neglect in coordination with County partner agencies**.
	2. **Coordinate with MCCPTA to provide a series of system-wide parent workshops and activities throughout the school year at different locations in the County**.
	3. **Support local school PTAs in providing educational activities for parents in the area of child abuse and neglect**.

**Strategic Priority Area 5: Ensure the MCPS curriculum contains robust student learning opportunities across all grade levels in abuse prevention and reporting.**

Educating our students about personal body safety and abuse prevention is imperative to our long-term efforts. While the MCPS curriculum currently contains lessons in this area, we believe there is room to enhance student learning in this important area. We should seek to ensure a more robust K-12 learning continuum in areas of child abuse and personal body safety to support our students’ education.

Recommendations:

* 1. **Enhance K-8 lessons on personal body safety and child abuse, neglect, and prevention**.
	2. **Review high school curriculum to ensure lessons on personal body safety and abuse prevention reflect most current practice in this area**.
	3. **Leverage school counselors to provide increased student learning opportunities in how to report suspicious adult behavior**.
	4. **Develop a staff training plan to ensure consistency in lessons across all schools**.

**Strategic Priority Area 6: Communicate regularly to students, parents, and the wider community about issues associated with child abuse and neglect.**

Communications should be a core part of any plan in the area of child abuse. There are multiple components to a communications plan in this area. First, it is important to disseminate widely any and all resources that MCPS has related to child abuse and neglect, as well as keep the community informed of updates to policy, regulations, protocols, curriculum, workshops, and activities. Second, it is critical that MCPS work with a multidisciplinary team of County agencies to determine when it is appropriate to communicate cases of suspected abuse by school system employees or suspected cases of abuse on school property. Both aspects of communications will be important for MCPS moving forward.

Recommendations:

* 1. **Continue to synthesize and add resources to the MCPS website, and utilize existing communication tools to ensure these resources are shared with the wider community**.
	2. **Update the websites of the Department of Student Services and Child Abuse and Neglect Workgroup as revisions are made to policy, regulation, protocols, and other aspects of this work**.
	3. **Make decisions about notification to parents and school communities about alleged abuse on school property or by school system employees in consultation with County partner agencies**.