

School Committee Meeting Materials

Regular School
Committee Meeting

November 4, 2019 7:00pm Ms. Mary A. Manning Mr. James M. Fleming Ms. Kristine Wilson



Ms. Ana Nuncio Mr. Manny Cruz Ms. Amanda Campbell

Mayor Kimberley Driscoll, Chair

"Know Your Rights Under the Open Meeting Law, M.G.L. c.30A § 18-25 and City Ordinance Sections 2-2028 through 2-2033"

October 31, 2019 (Date Posted)

REGULAR SCHOOL COMMITTEE MEETING ON NOVEMBER 4, 2019

Notice is hereby given that the Salem School Committee will hold a Regular School Committee meeting on **Monday, November 4, 2019 at 7:00 p.m**. The meeting will be held in the School Committee Chambers at Collins Middle School, 29 Highland Avenue, Salem, MA.

I. Call of Meeting to Order

II. Consent Agenda

- a. Minutes of the Regular School Committee meeting held October 21, 2019
- b. Approval of Warrants: 10/24/19 in the amount of \$430,623.60, 10/31/19 in the amount of \$591,473.88, 11/7/19 in the amount of \$308,093.71

III. Approval of the Agenda

IV. Public Comment #1: Questions and Comments from the Audience

V. Superintendent's Report – Kathleen Smith

Update on the 2020-21 Principal Hiring Process for Bentley and Salem High School

Other Presentations and Reports

Student School Committee Representative Report

Annual Innovation School Evaluations and Update on Salem's Innovation Schools: Carlton Innovation School and New Liberty Innovation School

Superintendent's 90 Day Entry into the Salem Public Schools Report

VI. Action Items: Old Business

- a. Update on the Superintendent Search Committee Meeting on 10/24/19 and Proposed Overview of the Search Process From the UMass Collins Center
- b. Final Response on the Open Meeting Law Complaints Submitted by Scott Andrade

VII. Action Items: New Business

- a. Discussion on the Year to Date Personnel Report
- b. Discussion on the Superintendent's Recommendation to Close School on March 3, 2020 for the Presidential Primary (Does Not Include Saltonstall)
- c. Deliberation and Vote on the Request From North East Burn Basketball Skills and Drills for the Use and Fee Waiver of the Bates Elementary School Gym for Salem Kids on Thursday Nights

VIII. Policy Subcommittee

a. Deliberation and Vote on the First Reading of the Recommendation of the Policy Subcommittee on the Revisions to the Following Policies:

5201	Organization of Instruction
5201.01	Instructional Materials
5203	Academic Program
5212.01	Equal Educational Access and Opportunity
5214	Waiver of Graduation Course Requirements
5215	Student Records

- IX. Finance Report
- X. Subcommittee Reports
- **XI.** School Committee Concerns and Resolutions
- XII. Public Comments #2: Questions and Comments from the Audience
- XIII. Adjournment

Respectfully submitted by:		
Angelica Alayon, Secretary to the		
Salem School Committee		

Salem School Committee Meeting Minutes Monday, October 21, 2019

A regular meeting of the Salem School Committee was held on Monday, October 21, 2019 at 7:05 p.m. in the School Committee Chambers at Collins Middle School, 29 Highland Avenue, Salem, MA.

Members Present: Ms. Mary Manning, Mr. James Fleming, Ms. Kristine Wilson, Ms. Ana Nuncio,

Mr. Manny Cruz, Ms. Amanda Campbell, and Mayor Kimberley Driscoll

Members Absent: Kathleen Smith, Interim Superintendent

Others Present: Kate Carbone, Assistant Superintendent, Jill Conrad, Chief of Systems Strategy,

Kristin Shaver, Business Manager, and Jillian Flynn, Student Representative

Call of Meeting to Order

Mayor Driscoll called the regular meeting of the Salem School Committee to order at 7:05 p.m.

Consent Agenda

a. Minutes of the Regular School Committee meeting held October 7, 2019

b. Approval of Warrants: 10/10/19 in the amount of \$183,716.17, 10/17/19 in the amount of \$296,769.63

Mr. Fleming motioned to approve the Consent agenda. Ms. Campbell seconded the motion. The motion carried.

Approval of the Agenda

Mr. Fleming motioned to approve the agenda. Mr. Cruz seconded the motion. The motion carried.

Public Comment #1: Questions and comments from the audience

Alexa Ogno, 180A Federal Street, on behalf of the League of Women Voters and the Salem Education Foundation, announced they have one last School Committee Candidate forum this Wednesday night at 6:30pm at the Collins Middle School that will also be broadcasted through SATV and available for viewing thereafter. Ms. Ogno explained that the Salem Education Foundation is now reviewing grant applications. Results should be available by mid November. Ms. Ogno explained that buying Food for Thought raffle tickets helps assist with the grant funding and explained the cost per ticket is \$5 or five tickets for \$20 (an extra ticket with the purchase of four). Ms. Ogno shared further details as to what the winner would receive and where to purchase them. The drawing of the raffle ticket would take place on Halloween.

Councilor Thomas Furey, 36 Dunlap Street, City Council Member At Large and former Salem School Committee member, thanked the School Committee for recognizing Ms. Gail A. Kucker and approving the renaming of the main office at Salem High School the Gail A. Kucker Welcome Center. Mr. Furey also spoke about a fee waiver for a fundraiser on Friday, December 6, 2019, at Salem High School auditorium.

Barbara McLernon, Paraprofessional and union representative, 25 Sunset Drive, Peabody, MA explained the need for more student supports, talked about the lack of paraprofessionals available for students with IEPs when they are pulled to substitute for teachers who are absent. There are not enough substitute teachers. Ms. McLernon talked about the need for paraprofessionals to have the necessary technology tools to provide students with the services they need to succeed, especially the 1:1 technology initiatives.

Jillian Flynn, Student Representative, provided a student representative report, requested funds for refreshments at their meetings and sponsorship letter, and reported that the first ALICE drill occurred today. Ms. Carbone said she would work with Kristin Shaver, Business Manager, to help provide light refreshments and snacks at their meetings and asked Ms. Flynn for a list of their meeting dates to set up a protocol.

Superintendent's Report

Ms. Kate Carbone, Assistant Superintendent, standing in for Superintendent Kathleen Smith this evening, reported that an update was sent out this morning to the School Committee, parents, Mayor Driscoll, and the Department of Health alerting them of a sudden water main break at the Collins Middle School. The situation was resolved. Ms. Carbone talked about her attendance at the ceremony for the Gail A. Kucker Welcome Center, located in the main office at Salem High School. Ms. Carbone announced that Salem High School would also be hosting a family and community event on November 7, 2019, from 6:00-7:30pm. The school will be highlighting what all Salem Schools have to offer to both current and potential Salem High School students and families. Ms. Carbone extended an invitation to all School Committee members, parents, and families on behalf of Salem High School, to attend this event.

Recognition of Deborah Jeffers, Director of Food and Nutrition Services and her staff

Ms. Kristin Shaver thanked and recognized Deborah Jeffers, Director of Food Services for Salem Public Schools' as well as staff members of food services for the high quality food and services on behalf of Superintendent Kathleen Smith.

Other Presentations and Reports

Areas for Improvement and Next Steps – Follow up from the 10/7/19 MCAS Presentation, Assistant Superintendent Kate Carbone and Team

Ms. Carbone introduced a follow-up presentation from the October 7th presentation on the 2019 MCAS Results for Salem Public Schools. This evening's presentation highlights initiatives in place to support equity and access to high quality instruction and support for better outcome for students. Ms. Carbone asked colleagues who are leading the work in Salem Public Schools' district and schools to present on the accessibility for diverse learners, strengthening of social, emotional and behavioral supports, strengthening of core instruction, addressing chronic absenteeism, and continuing on with high school redesign. Ms. Rebecca Westlake, Director of English Language Learning (ELL), Ellen Wingard, Director of Student and Family Support, Amy Richardson, Director of Curriculum Instruction and Assessment (CIA), Jill Conrad, Chief of Systems Strategy & Samantha Meier, Salem High School Interim Principal, and Emily Flores, Salem High School Academic Dean, presented this evening.

Discussion on pathways and internship programs

Mayor Driscoll stated her interest to see community service and learning opportunities built and fully integrated into the Discovery Pathways. Ms. Flores responded that they are currently looking to incorporate that into the 11th and 12th grades. Mr. Fleming asked for a future update on the internship programs.

Discussion on topics that need to be addressed at future School Committee meeting

Ms. Carbone shared key questions for future discussion by the School Committee as the district prepares for the budget planning process, including the need for policy support, a time audit to assess the amount of time for learning during many of the schools' short 6-hour days, common planning time for teachers, teacher retention, and lack of internal IT capacity. Mayor Driscoll commented on the need to address the early start at Salem High School.

Action Items: Old Business

Update on the Superintendent Search Committee process

Mayor Driscoll reported that she, Mary Manning, and Manny Cruz, School Committee members on the Superintendent Search Committee, had an opportunity to review the letters of interest and expressions from residents interested in serving on the screening committee. This includes representatives from every

category with the exception the student and special education representatives which they are waiting to hear back from. They are hoping that the School Committee (who each received a list, via email, of all names) can approve the screening committee and enable them to start the first meeting proposed for Thursday, October 24, 2019. Mayor Driscoll explained that the consultant would be present at that meeting. They are hoping to have an orientation and understand what the next steps would be in the Superintendent search.

Ms. Manning motioned to approve the screening committee for the Superintendent search. Ms. Wilson seconded the motion. The motion carried.

Action Items: New Business

Discussion regarding the 90 Day Review of the Interim Superintendent of the Salem Public Schools Mayor Driscoll read a list of topics to frame a conversation to review the Interim Superintendent's first 90 days in the district. Members were asked to share their thoughts, suggestions, or feedback on the topics. The goal would be to review the topics with Superintendent Smith during their meeting on November 4, 2019. School Committee members briefly shared some feedback on the actions of Superintendent Smith and agreed to have an agenda item for the next School Committee meeting on November 4, 2019 that would incorporate their feedback for a formal preparation of a 90-day review to share with Superintendent Smith.

Proposed Procedures for Following Open Meeting Law Complaints

Mayor Driscoll suggested referring the matter to the Policy Subcommittee for further review and discussion to determine best course of action. Members agreed the item is already listed with the Policy Subcommittee.

Discussion and Response Regarding an Open Meeting Law Complaint submitted by Scott Andrade Mayor Driscoll explained the complaint submitted by Scott Andrade and further explained that the School Committee's Attorney, Ms. Colby Brunt, reviewed the matter and determined that no violation took place as the item referenced was a procedure and not a policy. Mayor Driscoll asked the members to discuss and vote on Attorney Brunt's findings and request she submit a response to Mr. Andrade.

Ms. Manning motioned to acknowledge the Open Meeting Law and amended complaints and respond with respect to the petitioner as noted by Attorney Colby Brunt. Mr. Cruz seconded the motion. The motion carried.

Deliberation and Vote on the Request by Councilor Thomas Furey to Waive Fees associated with use of the Salem High School Auditorium

Mr. Fleming motioned to approve the request from Councilor Thomas Furey to waive fees associated with use of the Salem High School auditorium on December 6, 2019 and that a finding be adopted by the Salem School Committee that is beneficial to the petitioner and Salem School district as a whole. Mr. Cruz seconded the motion. The motion carried.

Finance Report

Kristin Shaver, Business Manager, reported on a projected FY20 YTD updated budget report

Budget Transfers

The Business Office requests the following transfer to align the budget with the appropriate expense account. During the FY20 budget process, it was determined that Behavior Specialists should be allocated to a separate account.

Account Description/Use	Account Number	Amount From	Amount To
Paraprofessionals	13641120-5163	\$29,530	
Behavior Specialists	13641120-5121		\$29,530
Paraprofessionals	13640220-5163	79,871	
Behavior Specialists	13640220-5121		79,871
Paraprofessionals	13640420-5163	42,082	
•	Page 3 of 5	·	

Behavior Specialists	13640420-5121		42,082
Paraprofessionals	13641020-5163	44,167	
Behavior Specialists	13641020-5121		44,167
Paraprofessionals	13641320-5163	47,022	
Behavior Specialists	13641320-5121		47,022
Paraprofessionals	13640620-5163	35,912	
Behavior Specialists	13640620-5121		35,912
Paraprofessionals	13640920-5163	38,939	
Behavior Specialists	13640920-5121		38,939

Mr. Fleming motioned to approve the FY20-1 budget transfer. Ms. Nuncio seconded the motion. The motion was approved.

The Business Office requests the following transfer to align the budget with the appropriate expense account. During the FY20 budget process, funds were allocated from the Dominion Fund to pay for 1:1 Devices at the High School, allowing the funds to be transferred to cover communications support and the Superintendent Search.

Account Description/Use	Account Number	Amount From	Amount To
SHS - Equipment	13571021-5860	\$75,000.00	
Superintendent's Office – Contract			
Services	13032041-5320		\$75,000

Mr. Fleming motioned to approve the FY20-2 budget transfer. Ms. Wilson seconded the motion. The motion was approved

Subcommittee Reports

Mr. Fleming reported that the Buildings and Grounds Subcommittee met today with several parents, across the district, primarily from the Witchcraft Heights Elementary School. They discussed potential sources of income and current location of the school playground. Two motions were filed; both carried 3 to 0 to ask that the School Committee adopt both. Mr. Fleming asked the School Committee to adopt the motion to conduct a feasibility study to look into a change of the Witchcraft Heights Elementary School playground location.

Mr. Fleming reported the discussion of funding relative to Witchcraft Heights Elementary, Saltonstall, and other schools in non-compliance. There was a motion that carried 3 to 0 for the district to move forward and apply for CPA funding in addition to the applications being made by the Witchcraft Heights Elementary School and possibly Saltonstall School PTO.

Mr. Cruz motioned to approve the Buildings and Grounds Subcommittee report, conduct the study of the feasibility, and change of the Witchcraft Heights Elementary School playground location. Ms. Nuncio seconded the motion. The motion carried.

Mr. Fleming motioned to accept the Buildings and Grounds Subcommittee report recommending applications to the CPA in addition to the playground sites at several schools. Mr. Cruz seconded the motion. The motion carried.

Ms. Wilson reported that the Personnel Subcommittee met on October 17, 2019 and voted to accept the new job description for the Secretary to the School Committee and the Superintendent.

School Committee Concerns and Resolutions

Ms. Manning addressed Barbara McLernon's earlier statement on the need for access to technology for paraprofessionals and their coverage in classes and wondered if the School Committee could get information on the number of times that paraprofessionals covered other classrooms that took away from their assigned duties. Ms. Manning asked Business Manager for information, to be provided at the next

School Committee meeting, about the number of paraprofessionals and potential cost estimate of providing paraprofessionals with a Chromebook for access to technology. Ms. Manning wondered if all paraprofessionals would need a Chromebook and said she would talk with Deborah Connerty, Acting Pupil Personnel Services (PPS) Director. Members agreed to ask Superintendent Smith to follow-up on this. Mr. Cruz took a moment to publicly recognize the students, their advisors, and everyone who worked in helping put together the student advisory counsel.

Ms. Nuncio talked about the district's need to address teacher retention as well as the recruitment and retention of more teachers of color for Salem and to set a goal for the upcoming years. Mayor Driscoll agreed and added that it would be great work for the Equity and Engagement subcommittee to also consider as they begin the umbrella of opportunities. Ms. Nuncio shared that students expressed interest in internships at Salem public schools.

Public Comment #2: Questions and Comments from the Audience - None

Adjournment

There being no further business to come before the School Committee this evening, Mr. Fleming motioned to adjourn the regular School Committee meeting. Ms. Campbell seconded the motion. The meeting was adjourned at 9:25pm.

Respectfully submitted by:

Angelica Alayon, Secretary to the Salem School Committee

Meeting Materials and Reports

School Committee Consent agenda October 21, 2019
Minutes of the October 7, 2019 Regular School Committee meeting
Open Meeting Law Complaint process
Open Meeting Law Complaint
Amended Open Meeting Law Complaint
Fee waiver request for use of Salem High School auditorium
FY20 YTD updated budget report
Budget transfers

Carlton Innovation School

School Committee Update 2019-2020

Who We Are



- Curriculum
- Budget
- School Schedule/Calendar
- Staffing
- Professional Development



Our Students





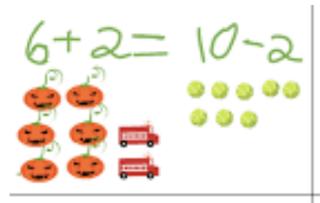


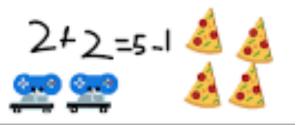
Our Parents/Caretakers



Areas for Growth



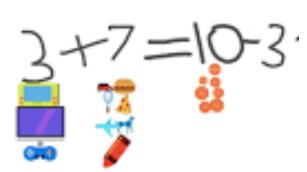




See it bigger

See it bigger





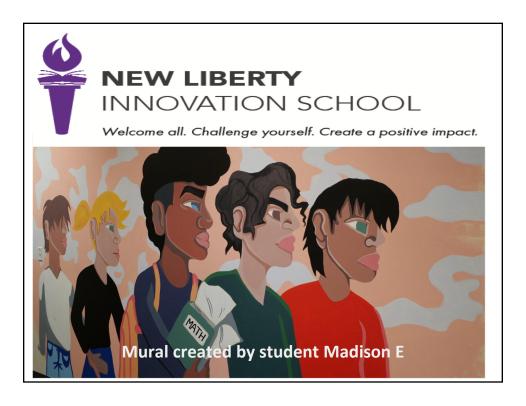
What Makes Our School Special











Who We Are

- Established as an in-district Horace Mann Charter School in 2011 to address the high drop out rate at SHS at the time
- Converted to an Innovation School in July 2016, when I joined as Principal
- Located in the Witch City Mall, 2nd floor
- We have approx 50 students but can go up to 55
- Due to a high "churn" rate, we usually work with 70-75 students total/year
- Our demographics closely mirror those of Salem Public Schools as a whole, however, we do have slightly less English Learners than many of the other schools

What Makes Us Unique

- Competency-based: Learning can happen anytime, anywhere and isn't based on seat time; our curricula comes from the Mass Frameworks and Next Gen Science Standards, but is truncated with a focus on depth vs breadth
- Three pillars: We focus on academics, social emotional learning (our "Essential Habits"), and career readiness ("Professional Readiness")
- Blended Learning/Personalized: Due to our small size we must maximize each teacher by using blended learning.
 This also allows us to be nimble and personalize the curriculum to meet students' individual needs

Who Are Our Students?

- Struggle for one reason or another in the larger HS (some come right from Collins and many come from out of district)
- Most have a trauma background
- Vast majority are in the DESE "high needs" category, most come from families that struggle financially, some are homeless or in danger of becoming homeless
- About 60% are on IEPs or 504 Plans for a learning or social-emotional disorder
- Many have experienced years of failure in school and a number are over-age and under-credited
- Some are academically gifted but experience social anxiety in the larger school setting

Why Innovation?

- New Liberty Charter School wasn't doing well;
 it had an extremely high drop out rate and very low graduation rate
- Innovation was a way to maintain some of the autonomies of a charter, but reap the benefits of being fully part of the Salem Public Schools



Innovation Autonomies -- Curric, Inst, Assessment

We have autonomies, apart from the Salem Teachers' Union and SPS in the areas of...

- Curriculum;
- Budget;
- School schedule and calendar;
- Staffing;
- Professional development; and
- School district policies



The Benefit of our Innovation Autonomies

We can be creative and innovative in these areas...

- The autonomy to create unique curricular materials in the academic, social/emotional learning and employment realms.
- The autonomy to provide instruction through a variety of modalities and using many platforms including classroom instruction, individual tutoring, student-led investigations, offsite experiential education and online instruction.
- The autonomy to assess students through growth portfolios and exhibitions of learning



The Benefit of our Autonomies Cont.

- We finalized a new graduation pathway for students who are very under-credited and over-age last year,
- Our social/emotional and employment competencies directly support high-needs students in learning the soft skills necessary for success in work, post-grad education, and life. Our graduates always site them as having been one of the most useful things they learned at New Liberty,
- Students can earn social/emotional competencies by collecting evidence and presenting on positive changes they are making in their personal life, such as at work, to our teachers.

The Benefit of our Autonomies Cont.

- Using a variety of assessments provides more entry points for students who struggle academically. For example, in some cases a portfolio or project might better demonstrate a students' learning than a multiple-choice test.
- Use of blended learning allows students who struggle with attendance to make up work when they return
- Students have access to non-academic opportunities through our regular Adventure programing (field trips). Students also go to the Salem Y most days, as part of our school program of study. This is imperative for exposing students to a wide variety of experiences outside of school, many of which they would not have had access to otherwise.

Innovation Autonomies -- Schedule

The autonomy to schedule school days, exhibition days, vacations and holidays, class times, block length, etc. as needed (including summer programming) that meet the time on learning (TOL) requirements in MA.

- We gather staff feedback following every trimester and use that information to make slight adjustments to our schedule before the next trimester.
- Last year we began each trimester with a STEM advisory challenge day, where students competed to produce the best final product instead of attending regular classes.
- We were able to take advantage of our scheduling autonomies to hold Student Led Conferences for the entire day in November and April rather than regular classes.
- Students continue to have an early release day (1:30) every Wednesday to allow for staff meetings and our teacher PLC meeting. Students go to Flex Blocks on Wednesdays now, which gives them time to make up missing work or move ahead in classes.
- We again changed our class schedule during our annual Symposium (Project Month) in December (2018 was our third time running Symposium Month).

Innovation Autonomies -- Staffing

The autonomy to create new job descriptions and titles and hire the right candidates for positions at the school.

- Recruitment and Intake Specialist
- Employment & Postgraduate Planning Specialist
- Academic Facilitator (formerly Blended Learning Specialist)













Project Liberty

The final Liberty Market was all us, the students did it all! The class was hands on the entire time. Jaden B. age 16





I loved this class! I'm interested in business and becoming an entrepreneur and we got to explore that. I also enjoyed the field trips and working to improve our school.

- Bella L. age 16

Strengths & Areas of Need



73%

Ave daily attendance first half of the year

72%

2017 and 2018 grads gainfully employed

58%

Ave daily attendance last winter

4%

2017 and 2018 grads in college

67%

Graduation rate 2018



52%

Families that participated in our Nov Student Led Conf

34%

Ave student "churn" throughout the year

5th -7th grade

Our students' average math ability range on the MAPs Test



The NLIS Vision For The Future

Increase Student Engagement in Academics

- Meaningful, rigorous academic instruction and remediation opportunities
- 100% PBL and real world service learning
- Student voice and ownership over their learning



All Students Will Be Employment Ready & Have A Postgrad Plan

- Access to work-based experiences that increase in intensity over their schooling
- All students participate in internships
- Project Liberty expanded and enhanced
- Students will leave with a job, a plan and knowledge of community resources



Connect
Students In
Need To
Services &
Supports

- On-site mental and physical health supports
- Regular student strengths-based inventories
- Individualized student support plans
- Cohesive supports with outside organizations for all student needs





Report on the Interim Superintendent's 120-Day Entry into the Salem Public Schools

Salem Public Schools
School Committee Meeting
November 4, 2019

5 Areas of Focus Understand Salem culture and values Strengthen School Committee – Admin relations Build relationships with schools and community Clarify administrative roles and functions Improve critical systems, processes, and functions



Understand Salem culture and values

Activities to Date	Strengths	Challenges and Opportunities
 Meetings with Executive Team, School Committee, Directors, Principals, & Staff Attending professional development School visits Statewide events 	 Vibrant, diverse culture Rich traditions Supportive families & community Strong School District/City relations 	 Meeting array of needs Communication with all stakeholders Building trust Effective ways to resolve conflicts/reach agreements

Next Steps

- Continue engagement in school, district, and community events
- Increase school site visits to gain deeper insights

SALEM PUBLIC SCHOOLS



Strengthen School Committee – Admin relations

Activities to Date	Strengths	Challenges and Opportunities
 Individual meetings with all members Daily calls and weekly updates Retreats 	 Dedicated members who care Willingness to learn together Building intentional transparency 	 Organizing protocols and effective structures, policy/governance roles Need for sustained, full-time administrative support Working respectfully together when a conflict arises in the best interest of the district

- Hold 2nd retreat with plans throughout the year for additional retreats including orientation for new members Hiring full time SC Secretary



Build relationships with schools and community

Activities to Date	Strengths	Challenges and Opportunities
 Attend events Engagement with groups and all stakeholders Strengthened relations with urban and regional colleagues 	 Broad base of support Numerous enrichment opportunities Strong political leadership for education in Salem 	 Lack of effective communications and engagement strategy (marketing) Informing the City and community about the many great things going on in the Salem Public Schools

Next Steps

- Continue participation in community events and outreach efforts
- Hire Chief of Public Relations and develop/implement strategic communications plan

SALEM PUBLIC SCHOOLS



Clarify administrative roles and functions

Activities to Date	Strengths	Challenges and Opportunities
 Mapping known gaps in duties and responsibilities of administrative staffing Identification of needed organizational structures Ongoing prioritization of needs 	 Highly talented staff and teams of professionals High level of dedication and passion to improve learning and supports for Salem's students 	 Lack of clarity around organizational structure and alignment Some gaps in critical functions exist Need for coherence

Next Steps

- Clarify organizational structure and alignment of roles and functions
- Provide administrative internship opportunities build a stable pipeline for leadership and teacher roles

Improve critical systems, processes, and functions

Challenges & Opportunities Strengths Executive and • Strong academic focus – • Coherence and coordination of great supports for behavior supports other staff teaching and learning Leadership pipeline development teams Focused Strong focus on Ability to lead and prioritize IT, discussions standards-based digital learning, and data and review of practices, ELs and SWDs management documents Strong professional • Need to strengthen recruitment and retention systems and data development across district Safety and security upgrades Analyze use of space Facilities upgrades

Next Steps

- Review and strengthen student handbooks and provide training or student discipline
- Develop internal strategic plan for IT/digital learning
- Strengthen recruitment and retention systems





























Questions or comments?

STONEMAN, CHANDLER & MILLER LLP

99 HIGH STREET BOSTON, MASSACHUSETTS 02110

TELEPHONE (617) 542-6789

FACSIMILE (617) 556-8989

WWW.SCMLLP.COM

JOHN M. SIMON KATE CLARK ANDREA L. BELL COLLEEN SHEA THOMAS H. COSTELLO

MIRIAM K. FREEDMAN OF COUNSEL

November 4, 2019

Via US Mail

ALAN S. MILLER

KAY H. HODGE

COLBY C. BRUNT

NANCY N. NEVILS JOAN L. STEIN

CAROL CHANDLER

REBECCA L. BRYANT

Mr. Scott Andrade 12 Grant Road Salem, MA 01970

RE: Open Meeting Law Complaint

Dear Mr. Andrade:

This letter is response to your recent open meeting law complaint. This response comes after the School Committee has met to consider your complaint and is copied to the Office of the Attorney General as required by law.

The School Committee understands that your complaint to be as follows: (1) the Committee has adopted a policy that all Open Meeting Law (OML) complaints are sent to the Superintendent, and not the Chair as required by law; (2) the Committee has improperly delegated the responsibility of dissemination to someone other than the Chair and that this is in violation of the law; and (3) the Committee has shifted its responsibility for responding to complaints to someone other than the Chair and that this is in violation of the law.

You also amended the complaint on October 17, 2019 and included a response to your public records request. This response will address that issue as well.

First, I note in my response that there appears to be no violation of the law as your complaint focuses on a newly developed procedure that can only be implemented once the Committee receives a complaint. As such, it is unclear if your complaint is truly "ripe" under the OML laws. That said, the Committee has authorized me to respond on their behalf regarding your concerns with the OML complaint procedure.

Issue #1: The Committee has adopted a policy that all OML complaints are sent to the Superintendent, and not the Chair as required by law.

Response:

This is not correct. First, the Committee did not adopt a new policy. There is a new procedure that the district follows regarding the process once the Committee receives an OML Complaint. Per the procedure, the Chair is still the individual that receives any open meeting law complaints. Salem believes that there may be confusion between the Open Meeting Law (OML) and the Public Records

Law. Salem recently informed members of the community where they could send requests for public records to ensure a timely response in accordance with the laws regarding public records. The Committee did not make, or announce any changes about the receipt of OML complaints. It also appears that your amended complaint is regarding your public records request. I believe that the Committee did respond to that request and noted that there was not a new policy, but rather a procedure.

Issue #2: The Committee has improperly delegated the responsibility of dissemination to someone other than the Chair and that this is in violation of the law.

Response:

The Committee disagrees with this assertion. In response to some recent OML complaints, Salem developed a procedure for handling OML complaints. Per that procedure, the Chair receives a complaint and then forwards that complaint to the Superintendent and the administrative assistant to the school committee. Per the procedure, the Administrative Assistant to the School Committee sends the complaint to the Committee members on behalf of the Chair. Please note that the Administrative Assistant to the School Committee is the person who, as a part of their job, sends all School Committee correspondence (except for Attorney-Client privilege information) to the Committee. As such, Salem asserts that this is not a violation of the Open Meeting Law because it is not specifically the Chair that sends the complaint to all committee members when the typical business practice in Salem is for the Administrative Assistant to the School Committee to send all materials to the members. The spirit of the law is to ensure that all members have a timely copy of the complaint and the process ensures this.

Issue #3: The Committee has shifted its responsibility for responding to complaints to someone other than the Chair and that this is in violation of the law.

Response:

The District asserts that per the law, the public body may delegate the responsibility for responding to the complaint to counsel or another individual, but it must first meet to do so. This is in line with the OML complaint procedure that is currently before the School Committee. Per the procedure, the Committee meets on the complaint, and then, the Chair and designee work on a response based on the determination by the Committee. As such, Salem asserts that there is no violation of the law by requesting that someone (in this case counsel) is designated to formally respond to the Complaint on behalf of the committee.

It is the Committee's position that there has been no violation of the Open Meeting Law. I hope this response resolves this matter for you. Thank you.

Sincerely,

Colby C. Brunt

Cc: Attorney General's Office

Mayor Kimberly Driscoll, Chairperson

Open Meeting Law Complaint Process

- 1. Complaint is received by the Chair of the School Committee.
- 2. Complaint is date stamped by the Chair.
- 3. Chair sends the Complaint to the Superintendent or Designee <u>and</u> Administrative Assistant to the School Committee as soon as possible.
- 4. Superintendent/designee sends a copy of the complaint to the municipal clerk.
- 5. Administrative Assistant to the School Committee sends a copy of the Complaint to all members of the School Committee.
- 6. The Chair and Superintendent set an agenda to include the complaint on an upcoming school committee meeting. *Must be within 14 calendar days of receiving complaint.*
- 7. The Committee must do the following regarding the Complaint at the School Committee meeting:
 - a. review the complainant's allegations; and
 - b. take remedial action if appropriate.
- 8. The Superintendent/Designee will work with the Chair to draft a response to the Complaint from the Committee that will include the following:
 - a. Response on whether the Committee did or did not violate the OML.
 - b. If there was a violation, any remedial action taken by the Committee.
- 9. The Superintendent/Designee will forward a copy of the complaint and its response, including a description of any remedial action taken, to the Attorney General's Office and send a copy of the response to the Complainant.

Work Location	Group	Position	Hire Date	New Position or Replacement	Education	Experience	Certifications	End Date	Length of Service
BATES SCHOOL	NON UNION	BUILDING SUB	01-07-2019					08-26-2019	Less than 1 year
BATES SCHOOL	NON UNION	BUILDING SUB	08-29-2019	Replacement	Bachelor's Degree	2 years	NA	Active Employee	Active Employee
BATES SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	07-31-2019	New Position	Bachelor's Degree	1st year	NA	Active Employee	Active Employee
BATES SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	08-29-2019	Replacement	Bachelor's Degree	7 years	NA	Active Employee	Active Employee
BATES SCHOOL	TEACHER	ADJUSTMENT COUNSELOR	06-25-2019	Replacement	Master's Degree	10 years	Sch Soc Wrk/Sch Adj Coun (All Levels)	Active Employee	Active Employee
BATES SCHOOL	TEACHER	МАТН СОАСН	05-21-2018					07-22-2019	1 year
BATES SCHOOL	TEACHER	TEACHER - GR 3	04-25-2016					08-01-2019	3 years
BATES SCHOOL	TEACHER	TEACHER - GR 3	08-12-2019	Replacement	Bachelor's Degree	4 years	Elementary (1-6)	Active Employee	Active Employee
BATES SCHOOL	TEACHER	TEACHER - GR 3	07-08-2019	Replacement	Bachelor's Degree	1 year	Elementary (1-6)	Active Employee	Active Employee
BATES SCHOOL	TEACHER	TEACHER - KG	07-26-2018					08-19-2019	1 year
BATES SCHOOL	TEACHER	TEACHER - KG	08-25-2019	Replacement	Master's Degree	5 years	Early Childhood (PreK-2)	Active Employee	Active Employee
BATES SCHOOL	TEACHER	TEACHER - MUSIC	09-08-2008					07-25-2019	11 years
BATES SCHOOL	TEACHER	TEACHER - MUSIC	07-31-2019	Replacement	Bachelor's Degree	1st year	Music:Vocal/Instrumental/General (All Levels)	Active Employee	Active Employee
BATES SCHOOL	TEACHER	TEACHER - TSP	05-06-2019	Replacement	Master's Degree	1st year	Elem (1-6), Moderate Disabilities (PreK-8)	Active Employee	Active Employee
BATES SCHOOL/BENTLEY ACADEMY	TEACHER	SCIENCE COACH	06-17-2019	Replacement	Master's Degree	9 years	General Science (5-8)	Active Employee	Active Employee
BENTLEY ACADEMY	NON UNION	INTERIM HEAD OF SCHOOL	08-20-2019	Replacement	Doctoral	5 years	Superintendent/Assistant Superintendent (All Levels)	Active Employee	Active Employee
BENTLEY ACADEMY	NON UNION	PRINCIPAL	07-01-2014					08-12-2019	5 years
BENTLEY ACADEMY	PARAPROFESSIO	NAL PARAPROFESSIONAL	05-01-2019					07-11-2019	Less than 1 year
BENTLEY ACADEMY	PARAPROFESSIO	NAL PARAPROFESSIONAL	10-15-2018					08-12-2019	Less than 1 year
BENTLEY ACADEMY	PARAPROFESSIO	NAL PARAPROFESSIONAL	08-28-2019	Replacement	Bachelor's Degree	4 years	NA	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	ADJUSTMENT COUNSELOR	07-24-2019	Replacement	Master's Degree	4 years	School Guidance Counselor (PreK-8)	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	NEW TEACHER DEVELOP COACH	06-02-2017					08-04-2019	2 years
BENTLEY ACADEMY	TEACHER	READING SPECIALIST	08-30-2017					08-06-2019	2 years
BENTLEY ACADEMY	TEACHER	TEACHER - GR 1	08-16-2019	Replacement	Bachelor's Degree	1st year	Early Childhood (PreK-2)	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	TEACHER - GR 1	08-01-2019	Replacement	Master's Degree	1 year	Elementary (1-6)	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	TEACHER - GR 2	06-06-2016					07-25-2019	3 years
BENTLEY ACADEMY	TEACHER	TEACHER - GR 2	07-30-2019	Replacement	Bachelor's Degree	1 year	Elementary (1-6)	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	TEACHER - GR 3	07-24-2017					07-09-2019	2 years
BENTLEY ACADEMY	TEACHER	TEACHER - GR 3	07-14-2016					07-09-2019	3 years
BENTLEY ACADEMY	TEACHER	TEACHER - GR 3	07-30-2019	Replacement	Master's Degree	14 years	Elementary (1-6)	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	TEACHER - GR 3	07-17-2019	Replacement	Bachelor's Degree	1st year	Elementary (1-6)	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	TEACHER - GR 3 ELA	07-11-2016					08-04-2019	3 years
BENTLEY ACADEMY	TEACHER	TEACHER - GR 3 ELA	07-17-2019					08-30-2019	Less than 1 year
BENTLEY ACADEMY	TEACHER	TEACHER - GR 4	10-04-2018					09-19-2019	1 year
BENTLEY ACADEMY	TEACHER	TEACHER - GR 4	09-26-2019	Replacement	Master's Degree	1 year	Elementary (1-6)	Active Employee	Active Employee
BENTLEY ACADEMY	TEACHER	TEACHER - GR 5 SPECIAL ED	05-22-2017					08-04-2019	2 years
BENTLEY ACADEMY	TEACHER	TEACHER - GR 5 SPECIAL ED	08-01-2019	Replacement	Master's Degree	1st year	Moderate Disabilities (PreK-8)	Active Employee	Active Employee

Work Location	Group	Position	Hire Date	New Position or Replacement	Education	Experience	Certifications	End Date	Length of Service
BENTLEY ACADEMY	TEACHER	TEACHER - SPECIAL EDUCATION	07-19-2017	,				08-04-2019	2 years
BENTLEY ACADEMY	TEACHER	TEACHER - SPECIAL EDUCATION	07-17-2019	Replacement	Bachelor's Degree	1st year	Moderate Disabilities (PreK-8)	Active Employee	Active Employee
BUSINESS OFFICE	AFSCME	AP ACCOUNTING COORDINATOR	08-14-2019	Replacement	Bachelor's Degree	2 years	NA	Active Employee	Active Employee
CARLTON SCHOOL	ADMIN	ASSISTANT PRINCIPAL	07-01-2019	Replacement	CAGS	1st year	Principal/Assistant Principal (PreK-8) Pending	Active Employee	Active Employee
CARLTON SCHOOL	AFSCME	CAFETERIA HELPER	08-09-2019	Replacement	Associate's Degree	1st year	NA	Active Employee	Active Employee
CARLTON SCHOOL	TEACHER	ADJUSTMENT COUNSELOR	07-11-2019	Replacement	CAGS	20 years	Sch Soc Wrk/Sch Adj Coun (All Levels)	Active Employee	Active Employee
CARLTON SCHOOL	TEACHER	TEACHER - LEARNING SKILLS SPECIAL ED	03-20-2018	3				07-25-2019	1 year
CARLTON SCHOOL	TEACHER	TEACHER - LEARNING SKILLS SPECIAL ED	06-18-2019	Replacement	Master's Degree	1st year	Moderate Disabilities (PreK-8)	Active Employee	Active Employee
CARLTON SCHOOL	TEACHER	TEACHER - P2	08-15-2019	Replacement	Master's Degree	1st year	Elementary (1-6)	Active Employee	Active Employee
CENTRAL ADMINISTRATION	ADMIN	CHIEF OF COMMUNICATION/ENG/MAR	03-28-2010	5				07-31-2019	3 years
CENTRAL ADMINISTRATION	ADMIN	INTERIM SUPERINTENDENT	07-01-2019	Replacement	JD, Cert School Admin and SAC, MA	6 years	Superintendent/Assistant Superintendent (All Levels)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	ADMIN	ASSISTANT PRINCIPAL	07-01-2019	Replacement	CAGS	1st year	Principal/Assistant Principal (5-12)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	AFSCME	BUILDING CUSTODIAN	07-23-2019	Replacement	High School Diploma	17 years	NA	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	AFSCME	BUILDING CUSTODIAN	08-12-2019	Replacement	High School Diploma	4 years	NA	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	NON UNION	FAMILY ENGAGEMENT FACILITATOR	09-11-2019	Replacement	Associate's Degree	9 years	NA	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	NON UNION	PARENT OUTREACH ADVISOR	02-13-200					07-12-2019	18 years
COLLINS MIDDLE SCHOOL	PARAPROFESSION	NAL PARAPROFESSIONAL	08-02-2019	Replacement	Bachelor's Degree	1st year	NA	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	PARAPROFESSION	NAL PARAPROFESSIONAL	07-26-2019	Replacement	Master's Degree	7 years	NA	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	PARAPROFESSION	NAL PARAPROFESSIONAL	07-11-2019	Replacement	Master's Degree	1st year	NA	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	BCBA THERAPIST	07-08-2019	Replacement	Master's Degree	3 years	License: Applied Behavior Analyst, Certified BCBA	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	LITERACY COACH	06-25-2019	Replacement	Master's Degree	10 years	English (5-8, 8-12)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - ASD INC SPECIAL ED	06-26-2019	Replacement	Bachelor's Degree	1st year	Moderate Disabilities (PreK-8)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - ELA	07-31-2019	Replacement	Bachelor's Degree	1 year	English (5-12)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - ELA	06-19-2019	Replacement	Master's Degree	7 years	English (5-12) Pending; (English 7-12 NY)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - ELA	06-14-2019	Replacement	Bachelor's Degree	1st year	English (5-12)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - ELA	05-30-2019	Replacement	Master's Degree	1st year	English (5-12)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - ESL	06-27-1996	5				08-30-2019	23 years
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - ESL	06-28-2019	Replacement	Master's Degree	8 years	ESL (5-12) Pending	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - FOREIGN LANGUAGE	08-14-2019	Replacement	Bachelor's Degree	3 years	Foreign Language - Spanish (5-12)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - MATH	06-29-201:	;				08-18-2019	4 years
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - MATH	06-20-2019	Replacement	Bachelor's Degree	1st year	Elementary (1-6)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - SCIENCE	08-06-2019	Replacement	Master's Degree	2 years	Earth Science (5-8)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - SCIENCE	05-28-2019	Replacement	Bachelor's Degree	2 years	General Science (5-8)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - SCIENCE	05-28-2019	Replacement	Master's Degree	11 years	General Science (5-8)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - SOCIAL STUDIES	07-17-2019	Replacement	Master's Degree	1 year	History (5-12)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	06-20-2019	Replacement	Master's Degree	1 year	Moderate Disabilities (PreK-8)	Active Employee	Active Employee
COLLINS MIDDLE SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	06-18-2019	Replacement	Bachelor's Degree	1st year	Moderate Disabilities (PreK-8) Waiver SY19/20	Active Employee	Active Employee

Work Location	Group	Position	Hire Date	New Position or Replacement	Education	Experience	Certifications	End Date	Length of Service
CURRICULUM INSTRUCTION & ASSESSMENT DEPARTMENT	ADMIN	DIRECTOR OF DIGITAL LEARNING	11-16-2017					07-31-2019	2 years
CURRICULUM INSTRUCTION & ASSESSMENT DEPARTMENT	ADMIN	DIRECTOR OF DIGITAL LEARNING	06-06-2019	Replacement	Master's Degree	1 year	Instructional Technology (All Levels)	Active Employee	Active Employee
CURRICULUM INSTRUCTION & ASSESSMENT DEPARTMENT	ADMIN	DIRECTOR OF TEACHER & LEADER DEVELOPMENT	09-23-2019	Replacement	Doctorate	8 years	Super Dir Core FL, Superintendent/Asst Superintendent (All Lev	vels) Active Employee	Active Employee
EARLY CHILDHOOD EDUC	AFSCME	SENIOR CLERK TYPIST	07-30-2019	Replacement	Bachelor's Degree	7 years	NA	Active Employee	Active Employee
EARLY CHILDHOOD EDUC	PARAPROFESSION	AL PARAPROFESSIONAL	08-02-2019	New Position	Associate's Degree	2 years	NA	Active Employee	Active Employee
EARLY CHILDHOOD EDUC	PARAPROFESSION	AL PARAPROFESSIONAL	07-26-2019	New Position	Bachelor's Degree	2 years	NA	Active Employee	Active Employee
EARLY CHILDHOOD EDUC	PARAPROFESSION	AL PARAPROFESSIONAL	08-06-2019	New Position	High School Diploma	1st year	NA	Active Employee	Active Employee
EARLY CHILDHOOD EDUC	PARAPROFESSION	AL PARAPROFESSIONAL	09-19-2019	Replacement	Bachelor's Degree	1 year	NA	Active Employee	Active Employee
EARLY CHILDHOOD EDUC	TEACHER	TEACHER - INTEGRATED K SPECIAL ED	06-04-2019	New Position	Master's Degree	12 years	Moderate Disabilities (PreK-8)	Active Employee	Active Employee
EARLY CHILDHOOD EDUC	TEACHER	TEACHER - SPECIAL EDUCATION	06-26-2014					07-24-2019	5 years
EARLY CHILDHOOD EDUC	TEACHER	TEACHER - SPECIAL EDUCATION	08-07-2019	Replacement	Master's Degree	14 years	Early Childhood (PreK-3)	Active Employee	Active Employee
HORACE MANN SCHOOL	NON UNION	BUILDING SUB	09-30-2019	New Position	Master's Degree	1 year	NA	Active Employee	Active Employee
HORACE MANN SCHOOL	NON UNION	COMMUNITY SCHOOL COORDINATOR	08-31-2016					08-31-2019	3 years
HORACE MANN SCHOOL	NON UNION	FAMILY ENGAGEMENT FACILITATOR	08-27-2019	Replacement	Bachelor's Degree	2 years	NA	Active Employee	Active Employee
HORACE MANN SCHOOL	TEACHER	LITERACY COACH	08-11-2015					07-10-2019	4 years
HORACE MANN SCHOOL	TEACHER	LITERACY COACH	08-06-2019	Replacement	Master's Degree	11 years	Early Childhood (PreK-2)	Active Employee	Active Employee
HORACE MANN SCHOOL	TEACHER	TEACHER - BILINGUAL KG	06-20-2019	New Position	Master's Degree	3 years	ESL (PreK-6)	Active Employee	Active Employee
HORACE MANN SCHOOL	TEACHER	TEACHER - GR 1	05-14-2019	New Position	Master's Degree	1st year	Early Childhood (PreK-2)	Active Employee	Active Employee
HORACE MANN SCHOOL	TEACHER	TEACHER - GR 2	08-28-2008					09-23-2019	11 years
HORACE MANN SCHOOL	TEACHER	TEACHER - GR 3	05-14-2019	Replacement	Bachelor's Degree	2 years	Elem (1-6) Pending; (Elem 1-6 Vermont)	Active Employee	Active Employee
HORACE MANN SCHOOL	TEACHER	TEACHER - GR 4 MATH/SCIENCE	05-19-2019	Replacement	Master's Degree	1st year	Elementary (1-6)	Active Employee	Active Employee
NEW LIBERTY	AFSCME	FRONT DESK SECRETARY	08-05-2019	New Position	GED	1st year	NA	Active Employee	Active Employee
NEW LIBERTY	TEACHER	TEACHER - LANGUAGE ARTS	07-24-2019	Replacement	Master's Degree	15 years	English (8-12)	Active Employee	Active Employee
NEW LIBERTY	TEACHER	TEACHER - MATH	07-05-2019	Replacement	Master's Degree	18 years	Mathematics (9-12)	Active Employee	Active Employee
NEW LIBERTY/SALEM PREP	TEACHER	NURSE	06-18-2019	Replacement	Bachelor's Degree	2 years	Registered Nurse	Active Employee	Active Employee
NURSE DEPARTMENT	ADMIN	DIRECTOR OF NURSING	07-15-2019	Replacement	Doctorate	8 years	PhD Nursing, Registered Nurse	Active Employee	Active Employee
NURSE DEPARTMENT	NON UNION	NURSE	03-12-2019					07-08-2019	Less than 1 year
NURSE DEPARTMENT	NON UNION	NURSE 1:1	06-14-2019					08-13-2019	Less than 1 year
NURSE DEPARTMENT	NON UNION	NURSE 1:1	08-20-2019	Replacement	Bachelor's Degree	9 years	Registered Nurse	Active Employee	Active Employee
NURSE DEPARTMENT	TEACHER	NURSE	08-08-2019	Replacement	Bachelor's Degree	3 years	Registered Nurse	Active Employee	Active Employee
NURSE DEPARTMENT	TEACHER	RN CASE MANAGER	08-01-2019	New Position	Master's Degree	11 years	School Nurse (All Level)	Active Employee	Active Employee
PARENT CHILD HOME PROGRAM	NON UNION	PARENT CHILD HOME PROGRAM MANAGER	09-05-2019	Replacement	Bachelor's Degree	16 years	Dept of Early Care & Ed Director Level II	Active Employee	Active Employee
PIC DEPARTMENT	NON UNION	LANGUAGE EVAL & EL FAMILY SPECIALIST	08-13-2019	Replacement	Associate's Degree	1st year	NA	Active Employee	Active Employee
PIC DEPARTMENT	TEACHER	PARENT CHILD HOME PROGRAM COORD	04-11-1988	Retirement				08-30-2019	31 years
PPS DEPARTMENT	TEACHER	BCBA THERAPIST	08-02-2019	Replacement	Master's Degree	3 years	Behavior Analyst Certification	Active Employee	Active Employee
PPS DEPARTMENT	TEACHER	OCCUPATIONAL THERAPIST	05-29-2019	Replacement	Master's Degree	3 years	OT Certificate	Active Employee	Active Employee
SALEM HIGH SCHOOL	ADMIN	ASSISTANT PRINCIPAL	07-06-2001					08-06-2019	18 years

3

Work Location	Group	Position	Hire Date	New Position or Replacement	Education	Experience	Certifications	End Date	Length of Service
SALEM HIGH SCHOOL	ADMIN	ASSISTANT PRINCIPAL	08-13-2019	Replacement	CAGS	2 years	Principal/Assistant Principal (9-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	ADMIN	ASSISTANT PRINCIPAL	06-18-2019	New Position	Master's Degree	2 years	Principal/Assistant Principal (5-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	ADMIN	DIRECTOR OF CAREER/TECH	07-01-2019	Replacement	Master's Degree	4 years	VocTech Principal/Asst Principal (9-14)	Active Employee	Active Employee
SALEM HIGH SCHOOL	ADMIN	DIRECTOR OF COLLEGE & CAREER READINESS CEN	07-01-2019	Replacement	Master's Degree	3 years	Supervisor/Director - (Guidance Director) (All Levels)	Active Employee	Active Employee
SALEM HIGH SCHOOL	AFSCME	CAFETERIA HELPER	09-08-2008					07-09-2019	11 years
SALEM HIGH SCHOOL	AFSCME	CAFETERIA HELPER	08-23-2017					08-30-2019	2 years
SALEM HIGH SCHOOL	AFSCME	CAFETERIA HELPER	08-09-2019	Replacement	Associate's Degree	1st year	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	AFSCME	CAFETERIA HELPER	08-09-2019	Replacement	High School Diploma	1st year	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	AFSCME	SENIOR ACCOUNT CLERK - ATHLETICS	09-06-2019	Replacement	Bachelor's Degree	9 years	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	AFSCME	SENIOR CLERK STENO	09-06-2019	Replacement	High School Diploma	15 years	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	NON UNION	PRINCIPAL	06-28-2019	Replacement	Doctorate	4 years	Principal/Assistant Principal (9-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	NON UNION	ROTC INSTRUCTOR	06-01-2018					08-02-2019	1 year
SALEM HIGH SCHOOL	NON UNION	ROTC INSTRUCTOR	07-25-2019	Replacement		Retired Marine		Active Employee	Active Employee
SALEM HIGH SCHOOL	NON UNION	SPEECH LANGUAGE PATHOLOGY ASST	10-13-2017					08-27-2019	2 years
SALEM HIGH SCHOOL	NON UNION	SPEECH LANGUAGE PATHOLOGY ASST	08-26-2019	Replacement	Bachelor's Degree	2 years	Speech-Lang Pathology Asst	Active Employee	Active Employee
SALEM HIGH SCHOOL	PARAPROFESSION	IAL PARAPROFESSIONAL	01-09-2018					08-28-2019	1 year
SALEM HIGH SCHOOL	PARAPROFESSION	IAL PARAPROFESSIONAL	09-03-2019	New Position	Bachelor's Degree	2 years	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	PARAPROFESSION	IAL PARAPROFESSIONAL	05-24-2019	Replacement	High School Diploma	9 years	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	PARAPROFESSION	IAL PARAPROFESSIONAL	09-19-2019	Replacement	Bachelor's Degree	1 year	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	PARAPROFESSION	IAL PARAPROFESSIONAL	07-12-2019	Replacement	Bachelor's Degree	2 years	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	EXTERNSHIP&CAREER READ COOR	07-28-2017					07-12-2019	2 years
SALEM HIGH SCHOOL	TEACHER	EXTERNSHIP&CAREER READ COOR	08-19-2019	Replacement	Bachelor's Degree	11 years	NA	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	INSTRUCTIONAL COACH HISTORY	06-21-2019	New Position	Master's Degree	14 years	History (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	MATH COACH	06-24-2019	New Position	Master's Degree	1st year	Mathematics (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	SCIENCE COACH	06-21-2019	New Position	Master's Degree	4 years	Biology (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - ART	07-03-2019	Replacement	Master's Degree	1st year	Visual Art (5-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - CULINARY ARTS	08-23-2017					07-22-2019	2 years
SALEM HIGH SCHOOL	TEACHER	TEACHER - CULINARY ARTS	08-26-2019	Replacement	Bachelor's Degree	2 years	Culinary Arts (9-12) Pending	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - MATH	06-24-2019	Replacement	Master's Degree	1 year	Mathematics (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - MATH	06-24-2019	Replacement	Bachelor's Degree	1st year	Mathematics (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - SCIENCE	08-11-2006					09-04-2019	13 years
SALEM HIGH SCHOOL	TEACHER	TEACHER - SCIENCE	09-12-2019	Replacement	Bachelor's Degree	1st year	Biology (8-12) Pending	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - SCIENCE	07-15-2019	Replacement	Bachelor's Degree	1st year	Biology (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - SCIENCE	06-19-2019	Replacement	Master's Degree	6 years	Chemistry (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - SCIENCE	06-07-2019	Replacement	Master's Degree	1 year	Biology (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - SOCIAL STUDIES	07-02-2019	Replacement	Bachelor's Degree	11 years	History (8-12)	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - SOCIAL STUDIES	07-02-2019	Replacement	Bachelor's Degree	2 years	History (8-12)	Active Employee	Active Employee

Work Location	Group	Position	Hire Date	New Position or Replacement	Education	Experience	Certifications	End Date	Length of Service
SALEM HIGH SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	08-30-2016					07-23-2019	3 years
SALEM HIGH SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	08-13-2019	Replacement	Bachelor's Degree	10 years	Moderate Disabilities (5-12) Waiver SY19/20	Active Employee	Active Employee
SALEM HIGH SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	07-24-2019	Replacement	Master's Degree	9 years	Severe Disabilities (All Levels)	Active Employee	Active Employee
SALEM PREP	TEACHER	SCHOOL ADJUSTMENT COUNSELOR	08-15-2016					09-10-2019	3 years
SALEM PREP	TEACHER	SCHOOL ADJUSTMENT COUNSELOR	09-23-2019	Replacement	Master's Degree	1st year	Sch Soc Wrk/Sch Adj Coun (All Levels)	Active Employee	Active Employee
SALTONSTALL SCHOOL	AFSCME	CAFETERIA HELPER	08-09-2019					09-26-2019	Less than 1 year
SALTONSTALL SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	08-19-2019	New Position	Bachelor's Degree	1 year	NA	Active Employee	Active Employee
SALTONSTALL SCHOOL	TEACHER	ADJUSTMENT COUNSELOR	06-14-2019	New Position	Master's Degree	1st year	Sch Soc Wrk/Sch Adj Coun (All Levels)	Active Employee	Active Employee
SALTONSTALL SCHOOL	TEACHER	МАТН СОАСН	05-17-2019	New Position	Master's Degree	23 years	Elementary (1-6)	Active Employee	Active Employee
SALTONSTALL SCHOOL	TEACHER	TEACHER - GR 2	05-21-2019	Replacement	Master's Degree	6 years	Elementary (1-6)	Active Employee	Active Employee
SALTONSTALL SCHOOL	TEACHER	TEACHER - GR 5/6	05-21-2019	Replacement	Master's Degree	3 years	English (5-12)	Active Employee	Active Employee
SALTONSTALL SCHOOL	TEACHER	TEACHER - MATH 7/8	06-14-2019	Replacement	Bachelor's Degree	1st year	Mathematics (5-8)	Active Employee	Active Employee
SALTONSTALL SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	08-26-2019	Replacement	Master's Degree	4 years	Moderate Disabilities (5-12)	Active Employee	Active Employee
SALTONSTALL SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	06-17-2019	Replacement	Master's Degree	4 years	Moderate Disabilities (5-12)	Active Employee	Active Employee
TRANSPORTATION	AFSCME	BUS DRIVER	01-27-2014					07-05-2019	5 years
TRANSPORTATION	NON UNION	CROSSING GUARD	09-01-2009					09-10-2019	10 years
WITCHCRAFT HEIGHTS SCHOOL	NON UNION	BEHAVIOR SPECIALIST	02-26-2018					07-09-2019	1 year
WITCHCRAFT HEIGHTS SCHOOL	NON UNION	BEHAVIOR SPECIALIST	09-04-2018					07-09-2019	1 year
WITCHCRAFT HEIGHTS SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	10-10-2017					07-22-2019	2 years
WITCHCRAFT HEIGHTS SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	10-02-2015					08-20-2019	4 years
WITCHCRAFT HEIGHTS SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	09-01-2013					08-21-2019	6 years
WITCHCRAFT HEIGHTS SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	01-18-2018					08-28-2019	1 year
WITCHCRAFT HEIGHTS SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	08-30-2019	Replacement	Master's Degree	3 years	NA	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	08-15-2019	Replacement	Bachelor's Degree	21 years	NA	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	PARAPROFESSIO	NAL PARAPROFESSIONAL	09-03-2019	Replacement	Bachelor's Degree	1 year	NA	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	TEACHER	ADJUSTMENT COUNSELOR	07-25-2019	New Position	Master's Degree	1 year	Sch Soc Wrk/Sch Adj Coun (All Levels)	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	TEACHER	PSYCHOLOGIST	07-30-2019	Replacement	Master's Degree	2 years	School Psychologist (All Levels) Pending (School Psychologist)	ologist NY) Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	TEACHER	TEACHER - ESL	06-20-2019	Replacement	Master's Degree	26 years	ESL (PreK-6)	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	07-01-2019	Replacement	Bachelor's Degree	1st year	Special Needs (All Levels) Pending	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	06-25-2019	Replacement	Master's Degree	1st year	Moderate Disabilities (PreK-8)	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	TEACHER	TEACHER - SPECIAL EDUCATION	06-11-2019	Replacement	Master's Degree	5 years	Moderate Disabilities (PreK-8) Waiver	Active Employee	Active Employee
WITCHCRAFT HEIGHTS SCHOOL	TEACHER	TEACHER - STEM	03-18-1985	Retirement				08-24-2019	34 years

Salem Public Schools

SY 19/20 Personnel Report - Summary July 1, 2019 - September 30, 2019

	AFSC	ME	ADM	IIN	NON U	NION	PAR	A	TEACI	HER	то	TAL
	New Hire		New Hire		New Hire		New Hire		New Hire	Exited	New Hire	Exited
Bates Elementary School					1	1	2		6.5	4	9.5	5
Bentley Academy School					1	1	1	2	9.5	10	11.5	13
Business Office	1										1	0
Carlton Innovation School	1		1						3	1	5	1
Central Administration			1	1							1	1
Collins Middle School	2		1		1	1	3		16	2	23	3
Curriculum Instruction & Assessment Department			2	1							2	1
Early Childhood Education	1						4		2	1	7	1
Horace Mann School					2	1			5	2	7	3
New Liberty School	1								2.5		3.5	0
Nurse Department - District Wide			1		1	2			2		4	2
Parent Child Home Program					1						1	0
PIC Department					1					1	1	1
PPS Department - District Wide									2		2	0
Salem High School	4	2	4	1	3	2	4	1	16	4	31	10
Salem Prep School									1.5	1	1.5	1
Saltonstall School		1					1		7		8	1
Transportation		1				1					0	2
Witchcraft Heights School						2	3	4	6	1	9	7
Total:	10	4	10	3	11	11	18	7	79	27	128	52

^{*}Fifty-Three (53) teachers exited at the end of the 18/19 school year

^{*}Twenty-Seven (27) teachers exited at the start of the 19/20 school year through 9/30/19

October 31, 2019

To Whom It May Concern:

I'm requesting for the gym fees to be waived, because we are a non-profit organization. Many of the students are low income at risk and cannot afford the gym costs.

Northeast Burn Basketball Skills and Drills at Bates Elementary School is Thursday nights,no cost for students.

I believe this program will help Salem students learn the game of basketball as well as working hard and being respectful. We are a non-profit organization and have mentored students since 2014. Students grades 2-12, but for this program we are helping students, grades 2-5.

You can follow us on facebook (Northeast Burn), instagram (@northeastburn) or YouTube (Northeast Burn Basketball).

Thank you,

Loreen Green (781) 346-1924 nolimittraining2011@yahoo.com

5000

INSTRUCTIONAL PROGRAM

5200

ORGANIZATION OF INSTRUCTION

5201

The School Committee is responsible for public education, kindergarten through grade 12, in the district, and if offered, pre-k, adult education and summer school.

The currently approved organization of instruction provides for the schools to be organized into elementary, middle and high school levels. Certain exceptions to this general rule may be made with the approval of the School Committee.

For more pertinent information, refer to the appropriate student handbook(s) and current program of studies.

Legal References: MGL 71:1; 71:37

Reviewed and referred by Policy Subcommittee on 11/1/19

Jill Conrad 11/1/2019 11:39 AM

Formatted: Indent: Left: 0.07", Right: 0.43", Line spacing: multiple 1.01 li

Jill Conrad 11/1/2019 11:39 AM

Deleted:

Victoria Caldwell 10/31/2019 11:30 AM

Comment [1]: 16A refers to regional school districts and does not apply

Victoria Caldwell 10/31/2019 11:29 AM

Deleted: C71, S16A & 37.

Jill Conrad 11/1/2019 11:39 AM

Deleted: Reviewed by Policy Subcommittee: September 2015

5000 INSTRUCTIONAL PROGRAM 5200 INSTRUCTIONAL MATERIALS 5202

The School Committee believes that the district must ensure that instructional materials support the district in meeting its stated goals.

The task of selecting instructional materials for programs will be delegated to the professional staff of the school district and approved by the Superintendent. When adopting and regularly evaluating instructional materials, professional staff must consider the following:

- 1. Instructional materials should be aligned with state and district standards and learning outcomes and should support district attainment of stated goals.
- 2. They must provide for all students an effective basic education that does not discriminate on the basis of race, age, color, religion, ancestry, national origin, sex, gender identity, physical disabilities, sexual preference or housing status.
- 3. They must allow sufficient flexibility for meeting the special needs of individual students and groups of students.

Legal References: MGL,71:48; 71:49; 71:50

603 CMR 26.00

20 USC 1232 h

Reviewed and referred by the Policy Subcommittee on 11/1/19

Jill Conrad 11/1/2019 11:42 AM

Deleted: .01

Victoria Caldwell 10/31/2019 11:41 AM Deleted: .

Victoria Caldwell 10/31/2019 11:41 AM

Deleted:

Victoria Caldwell 10/31/2019 11:41 AM

Deleted: .

Victoria Caldwell 10/31/2019 11:41 AM

Deleted: .

Victoria Caldwell 10/31/2019 11:39 AM

Deleted: BESE regulations

Jill Conrad 11/1/2019 11:42 AM

Deleted: Approved by School Comm...[1]

STUDENTS AND INSTRUCTION 5000 **INSTRUCTIONAL PROGRAM** 5200 ACADEMIC PROGRAM 5203 The superintendent of schools or his/her designee/s shall be responsible for the development, implementation, evaluation, and improvement of the academic program for the district. Public presentations will be made regularly to the School Committee regarding the academic program and any major changes to the program will be presented to the School Committee for approval. Reviewed and referred for 1st Reading by the Policy Subcommittee on 9/19/19 Jill Conrad 11/1/2019 11:29 AM Formatted: Superscript Jill Conrad 11/1/2019 11:29 AM Deleted:

5000

INSTRUCTIONAL PROGRAM

5200

EQUAL EDUCATIONAL ACCESS & OPPORTUNITY

5212.01 Jill Conrad

State law provides the following:

Every child shall have a right to attend the public schools of the town where he/she actually resides, subject to the provisions of Chapter 76. All enrolled students shall have equal access to the general education program and the full range of any occupational/vocational education programs offered by the district.

In compliance with state and federal laws, the Salem Public Schools maintains a nondiscrimination policy. No child shall be excluded from or discriminated against in admission to Salem Public Schools, or in obtaining the advantages, privileges and courses of study of our schools, regardless of race, color, sex, gender identity, religion, national origin, ancestry, sexual orientation, disability, or housing status. This policy provides equal access to courses and programs, counseling services, physical education and athletics, vocational education, instructional materials, extra-curricular activities, and access to restroom and locker room facilities.

Legal References:

State Requirements: Mass. Const. Amendment Article 114; MGL 71A:1; 76:5; 603 CMR 26.03

Federal Requirements: (IDEA-2004) 42 USC 2000d; 34 CFR 100.3(a),(b); 20 USC 1703(f); 20 USC 1681; 34 CFR 106.31, 106.34, 106.35; Section 504: 29 USC 794; 34 CFR 104.4; Title II: 42 USC 12132; 28 CFR 35.130; IDEA 2004: 20 USC 1400; 34 CFR 300.110; NCLB: Title III, Part A, Sec. 3121(c)(1)(C); Title X, Part C, Secs. 721, 722(g)(4);

Reviewed and approved by the Policy Subcommittee on 11/1/19

Jill Conrad 11/1/2019 11:32 AM

Deleted: melessness

Jill Conrad 11/1/2019 11:33 AM

Deleted: and

Victoria Caldwell 10/31/2019 11:51 AM

Deleted: amend. art.

Victoria Caldwell 10/31/2019 11:51 AM

Deleted: .

Victoria Caldwell 10/31/2019 11:51 AM

Deleted:

Victoria Caldwell 10/31/2019 11:51 AM

Deleted:

Victoria Caldwell 10/31/2019 11:52 AM

Deleted: c.

Victoria Caldwell 10/31/2019 11:52 AM

Deleted:, s.

Victoria Caldwell 10/31/2019 11:53 AM

Deleted: 7

Victoria Caldwell 10/31/2019 11:52 AM

Deleted: c.

Victoria Caldwell 10/31/2019 11:52 AM

Deleted: , s.

Victoria Caldwell 10/31/2019 12:02 PM

Comment [1]: Should read 1 not 7 under 71A

Victoria Caldwell 10/31/2019 11:57 AM

Deleted: Title VI:

Victoria Caldwell 10/31/2019 12:01 PM

 $\textbf{Deleted:}\ U.S.C.$

Victoria Caldwell 10/31/2019 11:59 AM

Deleted: EEOA:

Victoria Caldwell 10/31/2019 12:00 PM

Deleted: U.S.C.

Victoria Caldwell 10/31/2019 11:59 AM

Deleted: Title IX:

Victoria Caldwell 10/31/2019 12:00 PM

Deleted: U.S.C.

Jill Conrad 11/1/2019 11:34 AM

Deleted: Approved – October 5, 2015

STUI	DENTS AND INSTRUCTION	5000
INST	RUCTIONAL PROGRAM	5200
WAI	VER OF GRADUATION COURSE REQUIREMENTS	5214
gradu requir waive langu extrer any ac	igh school principal has the authority to waive or delay the compleation course requirements, with the exception of Department of Extrements. At the request of the Special Education IEP Team, a princer from completion of foreign language requirements for students wage learning disabilities. The granting of such waivers should be une care; as such waivers may impact the college application proception approved by the principal, the designated number of credits be ation must still be met to graduate.	ducation cipal may grant with documented indertaken with ss. Regardless of
For po	ertinent information refer to the Salem High School Program of St book.	udies and Student
<u>Legal</u>	References: MGL 69:1D; 71:2; 71:3	
Chapt	ter 108 of the Acts of 2012 (VALOR Act); Administrative Advisor	ry SPED 2018-2
Revie	ewed and referred by the Policy Subcommittee on 11/1/19	

5000

INSTRUCTIONAL PROGRAM

5200

STUDENT RECORDS

5215

State law provides that the schools must furnish any student or former student with a transcript of his/her record as a student; the original to be furnished without charge and copies furnished at limited charges established by the law.

These records are maintained in the best interest of the student, and with a concern for the school's right to collect certain information in order to carry out its educational function in the best possible manner. The school department will make every effort, within reason and consistent with state and federal regulations, to inform parents and students about the kinds of information collected or that will be collected and about their rights under said regulations. A parent may request a review of their child's student record and request a revision of that record.

All records and documents regarding discipline shall be removed from the student's file and destroyed upon the student's graduation or permanent withdrawal from the school,

For further pertinent information, refer to the appropriate student handbook and the Family Education Rights and Privacy Act.

Legal References: MGL <u>71:34A; 71:34B; 71:34D;</u> 71:34E; <u>71:34H</u>

20 <u>USC</u> 1232 g: 1232 h

34 CFR 99 603 CMR 23.00

Reviewed and referred by the Policy Subcommittee on 11/1/19

Jill Conrad 11/1/2019 11:37 AM

Deleted:

Victoria Caldwell 10/31/2019 12:20 PM

Deleted: Section

Victoria Caldwell 10/31/2019 12:22 PM

Formatted: Space Before: 0 pt, Line

spacing: exactly 13.5 pt

Victoria Caldwell 10/31/2019 12:20 PM

Deleted: U.S.C.

Victoria Caldwell 10/31/2019 12:22 PM

Deleted:

... [1] Victoria Caldwell 10/31/2019 12:21 PM

Deleted: C.F.R.

Victoria Caldwell 10/31/2019 12:21 PM

Deleted: Section

Victoria Caldwell 10/31/2019 12:21 PM

Deleted: C M R

Jill Conrad 11/1/2019 11:37 AM

Deleted: Approved: 1/9/06

Victoria Caldwell 10/31/2019 12:19 PM

Deleted: Page 1 of 2