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December 20, 2024

Mankah Mitchell
Ben Roovers
Office of Legal Counsel
Madison Metropolitan School District
545 W. Dayton Street
Madison, WI 53703

Re: Summary of the Nurse Complaint Investigation into Allegations
Against Annabel Torres

Dear Attorneys Mitchell and Roovers:

On or about October 2, 2024, three (3) former nursing staff employees of Southside Elementary School (Southside) and/or Allis Elementary School (Allis)¹ in the Madison Metropolitan School District (District) – Nurse Jamie Gribb, Nursing Assistant Elesia Jones, and Nurse Kimberly Reain (Complainants) – submitted a Complaint against Assistant Principal Annabel Torres.² On or about October 4, 2024, the District engaged the services of Renning, Lewis, & Lacy, s.c., to investigate the Complaint. You explained the need for a prompt and impartial investigation.

Due to some safety concerns presented in the Complaint, on or about October 7, 2024, the District placed Ms. Torres on paid administrative leave pending the completion of the Complaint.

Between October 11, 2024, and November 14, 2024, I conducted interviews with the following District employees: Ms. Gribb, Ms. Larson-Lohmiller, Ms. Terrell, and Ms. Torres. I also conducted interviews with the following former District employees: Ms. Jones and Ms. Reain.

In addition, I reviewed documents provided by the District and current and former District employees.

Below is a summary of my findings and conclusions, after considering all of the evidence collected during this investigation:

¹ Prior to the 2023-2024 school year, the Elementary School was Allis. At the beginning of the 2023-2024 school year, the Elementary School was renamed Southside and changed locations in Madison, Wisconsin.

² The Complainants submitted the Complaint to me, Attorney Laura Pedersen, because I was investigating a complaint raised by current and former Allis/Southside employees.

1. **All-Gender Restroom and Student Changing Table.** Substantial evidence does exist to conclude that the all-gender restroom across from the Main Office at Southside posed safety concerns to students through most of the 2023-2024 school year, despite Ms. Torres being aware of such concerns. Substantial evidence does exist to conclude that during the 2023-2024 school year the location of Southside's changing table and the height of the changing table did not comply with the ADA. Moreover, the placement of the changing table in the all-gender restroom impeded the purpose of having an all-gender restroom on each floor at Southside (i.e., offering LGBTQIA+ students an accessible restroom when needed). The facts supporting these conclusions include, but are not limited to:
 - a. In October 2023, the following occurred:
 - i. Ms. Reain requested a high/low changing table for the all-gender restroom.
 - ii. Ms. Reain sent an email to several individuals, including Ms. Torres, asking to have a high shelf installed in the all-gender restroom "so [staff] c[ould] reach cleaning supplies without students reaching cleaning supplies." Staff used the Profect HP Hydrogen Peroxide disinfectant in that restroom, which is stronger than the disinfectants used by custodial staff. The Safety Data Sheet released by the manufacturer of the product states that the disinfectant may cause eye, skin, and respiratory irritation; may be harmful if swallowed; and should be kept out of the reach of children.
 - b. On or about November 8, 2023, Ms. Reain sent an email to several individuals, including to Ms. Terrell and Ms. Torres, requesting "a high shelf in [the all-gender restroom to] provide safety around cleaning supplies." Ms. Terrell responded and proposed having a locked cabinet installed.
 - c. On or about February 26, 2024, Ms. Reain sent an email to several individuals, including Ms. Torres, saying, "at one point there was talk about a cabinet that locks so we have a place to keep our cleaning products." Ms. Reain additionally stated that she was "not sure where things [were] with the changing table."
 - d. During the 2023-2024 school year, Southside never obtained a locked cabinet; however, as a temporary solution, Southside got a cabinet with drawers to store the cleaning products.
 - e. On or about June 6, 2024, Ms. Gribb sent an email to several individuals, including Ms. Torres, saying that Southside "d[id] not have a table that raises and lowers [to change students]" and the cot that they were using did not comply with the Americans with Disabilities Act (ADA) requirements.

More specifically, Ms. Gribb stated that the cot was only seventeen (17) inches off the ground and only had six (6) inches of space between the back legs of the cot and the toilet. The ADA states that work surfaces, which include baby changing and other tables, must be twenty-eight (28) inches minimum and thirty-four (34) inches maximum above the ground. See 2010 ADA Standards for Accessible Design, Section 902.3. <https://www.ada.gov/law-and-regs/design-standards/2010-stds/>. The ADA requires sixty (60) inches of unimpeded turning space in restrooms to facilitate sufficient space for wheelchair accessibility, which must allow for toe and knee clearance. See *id.*, at Section 603.2.1.

Ms. Gribb also stated in the email that because the all-gender restroom was being used for changing students, the restroom was "not a welcoming space for [Southside's] LGBTQIA+ students."

- f. On or about July 29, 2024, Senior Administrative Clerk at the Doyle Administration Building (Doyle), Aaliyah Justice, ordered Southside a high/low changing table.
2. **Allis Steps.** Substantial evidence does not exist to conclude that Ms. Torres failed to address the safety concerns posed by the steps or surrounding area outside of the Health Office at Allis. Moreover, the Complainants presented no evidence to conclude that the steps or the surrounding area posed a safety risk to students. The facts supporting this conclusion include, but are not limited to:
 - a. Neither Ms. Gribb nor Ms. Reain raised concerns about the aforementioned steps with Ms. Torres.
 - b. Ms. Torres expected custodians to review exterior steps and the surrounding area to make sure everything was in "[g]ood [r]epair" on the first day of each school year and to address any items needing repair throughout the year. The "Allis Custodial Check in 22-23" and the "Custodial Support Request (Responses)" documents demonstrate that the steps were never identified by any Allis' staff member as needing repair.
 3. **Field Trip Notification.** Substantial evidence does exist to conclude that Allis and Southside's field trip approval procedure was inadequate during the 2022-2023 and 2023-2024 school years.

Nonetheless, substantial evidence does not exist to conclude that students *often* left for field trips without proper medication because of the inadequate field trip approval procedure. Substantial evidence does not exist to conclude that Ms. Torres dismissed Ms. Reain's concerns about not receiving adequate notification before field trips. The facts supporting these conclusions include, but are not limited to:

- a. During the 2022-2023 school year, Allis utilized the "Elementary/Middle/High School Field Trips" form, which required staff members to obtain field-trip approval from the Principal "at least 1 month" prior to field trips and notify the Nurse of planned field trips "at least 2 weeks" prior to field trips.
 - b. On or about March 15, 2023, a student who was attending a field trip did not have medications available for the field trip because Ms. Reain had not been notified that the student was attending a field trip. Ms. Reain worked with the student's mother and Ms. Torres on a plan for allowing the student to attend the field trip without the student's medications. Ms. Reain also sent an email to Ms. Torres and others expressing concerns about the field trip notification process. Ms. Reain advised Ms. Torres that Ms. Reain learned about three (3) field trips with less than two (2) weeks' notice. Ms. Torres responded that she and Ms. Terrell would collaborate with Ms. Reain regarding field trip management.
 - c. On or about May 22, 2023, Ms. Shorette Ogden advised a staff member who wanted approval for a field trip occurring in nine (9) days that Allis required "a 2 month notice for field trips usually." Ms. Terrell then stated, "because it is a walking [field trip] it is a possibility." The staff member subsequently sent Ms. Reain a list of the students attending the field trip.
 - d. During the 2023-2024 school year, Southside used the "Southside – Field Trip Approval Form," which required staff members to submit the form "for principal review prior to parent notice and at least 2 weeks prior to trip." A related form attached to the "Southside – Field Trip Approval Form" stated that "[o]nce approved," staff were required to advise "all affected parties," including the Health Office. Southside staff members also utilized the "Elementary/Middle/High School Field Trips" form, which contained the one (1) month requirement.
 - e. On or about April 29, 2024, Senior Administrative Clerk Annette Williams gave Ms. Gribb notice of a field trip occurring in nine (9) days.
 - f. On or about May 18, 2024, a staff member sent Ms. Terrell and Ms. Torres an email regarding a field trip occurring in eleven (11) days, and Ms. Torres responded, "Please update the roster as soon as possible and share with the nurse so she can prepare appropriately in advance."
4. **Job Description – Lost-and-Found/Laundry Responsibilities.** Substantial evidence does not exist to conclude that Ms. Torres solely tasked Ms. Gribb or Ms. Reain with tending to the laundry and lost-and-found at Allis and Southside.

That said, Ms. Torres conveyed to Ms. Gribb via the roles and responsibilities document that Ms. Gribb alone was responsible for Southside's laundry. When Ms. Gribb asked for clarification in the document, Ms. Torres did not revise the document. The facts supporting these conclusions include, but are not limited to:

- a. On or about May 9, 2023, Ms. Reain sent Ms. Terrell an email that said, "Can you put the laundry cleaning process into a guideline that we can all see? I cannot do the laundry.... It is not realistic or sustainable that the Health Office is managing this." Ms. Terrell responded, copying Family Liaison Marisa Lukesic, stating, "There is no one person responsible for laundry.... I would suggest creating a system.... Marissa could you support with putting a load in each day as needed after checking in with the health office?"
 - b. On or about June 20, 2023, Ms. Torres added a document on Southside's shared drive (i.e., folders within a Google Drive that can be accessed by a group of employees). Staff members at Allis had been using the document to define the roles and responsibilities for the Instructional Coach, Positive Behavior Support (PBS) Coach, Psychologist, Social Worker, Reading Interventionist, Program Support Teacher, Culture and Climate Team Leader, Nurse, Principal, Assistant Principal, Custodian, and the Administrative Assistants. Under the roles/responsibilities for the Nurse, the document stated that, among other responsibilities, the Nurse was responsible for lost-and-found and laundry. According to the document, the Custodian and Administrative Assistants were also responsible for the lost-and-found, but nobody else was responsible for laundry.
 - c. On or about June 6, 2024, Ms. Gribb reviewed the roles and responsibilities document and added a comment to the document that read, "The health office will do its own laundry and necessary student laundry that is required for our health office visits. We do not have capacity or time to manage more than that. We also do not have the capacity to manage Lost and Found."
 - d. On or about July 19, 2024, Ms. Torres resolved Ms. Gribb's message related to laundry duties, without removing or modifying the language pertaining to the Nurse's roles and responsibilities. Ms. Torres admitted during this investigation that she should have modified the language to suggest that the Nurse shared in laundry duties with others and was only required to do laundry for the Health Office.
5. **Parent/Ambulance Contacts.** Substantial evidence does exist to conclude that Allis' and Southside's procedures were inadequate during all of the 2022-2023 school year and some of the 2023-2024 school year related to who should call a student's parent after the nursing staff examined a student in the Health Office. However, in approximately November 2023, Southside refined their reporting

process to ensure that parent contacts were being made by the appropriate party. The facts supporting these conclusions include, but are not limited to:

- a. On or about [REDACTED], the following occurred:
 - i. The father of a Southside student sent Ms. Terrell and Ms. Torres an email stating that during the [REDACTED] school year, his child had been seen by nursing staff multiple times with injuries caused by other students. The father asked why no one at Southside contacted him.
 - ii. Ms. Terrell exchanged a series of email messages with Ms. Reain and District Lead Nurse Kari Stampfli about whether the nursing staff changed their procedures for calling home.
 - iii. Ms. Reain and Ms. Stampfli advised that the nursing staff called parents when student injuries required follow-up (e.g., head injuries requiring medical management and injuries requiring parent pick-up) but could not call in all circumstances when students reported to the Health Office.
 - iv. Ms. Terrell responded, "Parents are accustomed to hearing from the nurse for each visit as that has been the practice.... Kim, let's connect to finalize the process."
 - v. Ms. Reain replied that since she started with the District, she had "not called parents for every health office visit."
 - b. In approximately November 2023, Southside began utilizing an email procedure to communicate student injuries between the Health Office and staff in need of the information. Ms. Terrell and Ms. Torres required nursing staff to copy them on the emails, so they could ensure that somebody contacted parents. If the nursing staff did not contact the parent, nursing staff wrote: "Here is the medical/health office information for when you contact parents," with accompanying details, followed by, "Please let us know if parents request further follow-up from our Health Office." If the nursing staff did contact the parent, nursing staff would indicate as much.
6. **Southside Inadequate Supply Inventory, Main Office Tripping Hazards, and Unsanitary Break Room.** Substantial evidence does exist to conclude that Southside had an inadequate inventory of certain supplies during the 2023-2024 school year; however, substantial evidence does not exist to conclude that Ms. Gribb made Ms. Torres aware that Ms. Gribb needed supplies. Substantial evidence does exist to conclude that due to a lack of storage at Southside, boxes did accumulate in the Main Office; however, substantial evidence does not exist to conclude that the boxes created a tripping hazard. Substantial evidence does exist

to conclude that during the 2023-2024 school year, Southside's Break Room often contained leftover food and dirty dishes; however, substantial evidence does not exist to conclude that the Break Room had mold on the counters. The facts supporting these conclusions include, but are not limited to:

- a. At the start of the 2023-2024 school year, Southside hired Ms. Williams, who did not have an adequate understanding of how many office supplies to order to fulfill Southside's needs through the end of the school year. As such, Southside ran short on some office supplies (e.g., paper). Ms. Torres worked with staff at the Holtzman Learning Center to borrow needed supplies. Ms. Gribb brought in her own paper but did not inform Ms. Torres that Ms. Gribb needed supplies.
- b. Southside had less storage space than Allis, so Ms. Torres worked with Building Services to order extra storage; however, the storage was on backorder through most of the 2023-2024 school year, so boxes accumulated along the walls of the Main Office. Neither Ms. Gribb nor Ms. Reain advised Ms. Torres that Ms. Gribb or Ms. Reain believed the boxes posed a tripping hazard, nor did anyone else.
- c. Ms. Gribb did not tell Ms. Torres that Ms. Gribb witnessed mold on the countertops or dirty dishes in Southside's Break Room. However, because multiple people reported that food and dishes were often left in the Break Room, Ms. Torres sent cleanup reminders to staff, Ms. Williams purchased cleaning supplies, and Community Schools Resource Coordinator Assendra Brown posted cleaning reminders in the Break Room.

7. **Southside Playground Safety.** Substantial evidence does exist to conclude that, in March 2024, Southside's playground contained hazards to students dating back to the beginning of the 2023-2024 school year.

However, when Ms. Gribb made Ms. Torres aware of those hazards, Ms. Torres immediately responded by asking Building II Custodian Dulce Bacallao to remove the hazards. Ms. Torres also informed Badger Rock Principal Joey Rosas about the matter. It remains unclear, however, why Building Services, Southside's custodial staff, or playground supervisors did not identify those hazards earlier in the 2023-2024 school year. The facts supporting these conclusions include, but are not limited to:

- a. Due to construction of Southside, Southside students could not access the school playground until approximately October 23, 2023. Until then, Southside students used the City park next to Southside for recess.
- b. On or about [REDACTED], a student came to the Health Office after stepping on a nail near the fence line between the Southside playground and the City park. Ms. Gribb subsequently walked the fence line and

discovered multiple boards with nails as well as a downed utility pole with protruding bolts. Ms. Gribb alerted Ms. Torres via email, and Ms. Torres informed Ms. Bacallao, who threw away the boards. Ms. Torres responded to Ms. Gribb, copying Mr. Rosas, "The boards have been removed... We will need to... put 2 tennis balls over the bolts... as a temporary solution." Mr. Rosas responded that "the pole was from a dated [Badger Rock] project that was not disposed of during construction," and further advised that he removed the bolts and would "repurpose the wood."

8. **Student Marijuana Use without Health Office Involvement.** Substantial evidence does not exist to conclude that Ms. Reain needed to be notified about three (3) students smoking a vape because the vape did not contain marijuana. The facts supporting this conclusion include, but are not limited to:

- a. Board Policy 4235 – Alcohol and Other Drug Use/Abuse prohibits students from possessing, consuming, or being under the influence of alcohol and/or other drugs at school. The Policy defines drugs as "illegal drugs, controlled substances, narcotics and prescription medication," and states that when a student has a medical emergency due to the ingestion of drugs, employees must seek help from a nurse.
- b. The District's 2023-2025 Safety Plan also states that "Generally, a student who is believed to be under the influence should be examined by the school nurse."
- c. The District's Behavior Education Plan (BEP) states that students in possession of electronic smoking devices must be supported, redirected, and given a warning, and staff should contact the student's family.
- d. On or about [REDACTED], Behavioral Education Assistant (BEA) [REDACTED] received a report that three (3) students [REDACTED] possessed and smoked a vape in the school. The vape did not contain marijuana. [REDACTED] spoke with the students' parents, and [REDACTED] and [REDACTED] spoke with the students.
- e. On or about [REDACTED], Ms. Terrell issued [REDACTED] in-school-suspensions and revoked their after-school activities for the month due to their use and possession of the vape on [REDACTED].

9. **Students in Main Office.** As indicated in a previous report, substantial evidence does exist to conclude that Student F and Student G spent sustained periods of time in [REDACTED] and while Student F was in [REDACTED], Student F did not have adequate support.

That said, substantial evidence does not exist to conclude that the same was true for Student A or Student C. The facts supporting these conclusions include, but are not limited to:

- a. Student F was assigned to a Buddy Room [REDACTED] on or about February 6, 2024, and remained [REDACTED] every school day until April 30, 2024, when Student F returned to the classroom part-time through the end of the 2023-2024 school year.
- b. Student G was assigned to a Buddy Room [REDACTED] on March 13, 2024, and remained in that Buddy Room until April 19, 2024, when Student G began receiving one-on-one support from [REDACTED] every school day until April 26, 2024.
- c. In addition to [REDACTED] Student A and Student C engaged in other behavioral incidents, which caused the Student Wellness Team (i.e., Mr. Cox, Ms. Larson-Lohmiller, PBS Coach Karen O'Donnell, Ms. Reain, Social Worker Maxwell Smith, Ms. Terrell, and Ms. Torres) to implement various supports for Student A and Student C during the [REDACTED] school year. One (1) such support involved Student A and Student C checking in with Ms. Terrell in the Main Office before reporting to their classrooms in the morning.

10. **Use of Jenn Garthwaite for Translation Services.** Substantial evidence does not exist to conclude that Ms. Torres told nursing staff that Bilingual Resource Specialist Jenn Garthwaite should never be used for translation services. The facts supporting this conclusion include, but are not limited to:

- a. During the 2022-2023 school year, a family who felt offended by Ms. Garthwaite's interactions with the family when Ms. Garthwaite was providing translation services requested that Ms. Torres provide such services in the future.
- b. During the 2023-2024 school year, another family felt that Ms. Garthwaite was inaccurately translating conversations between their child's teacher and the family, so they asked to have an alternate translator.
- c. When families asked for an alternate translator, Ms. Torres complied with those requests and told nursing staff not to use Ms. Garthwaite. Ms. Torres, however, did not instruct nursing staff never to use Ms. Garthwaite for translation services.

- d. In the first month of the 2024-2025 school year, after Ms. Garthwaite provided translation services to a different family, the family reported to their child's teacher, 4K Teacher Desiree Besson-Anderson, that Ms. Garthwaite's tone and demeanor lacked empathy. As such, the family asked not to work with Ms. Garthwaite in the future.

In summary, substantial evidence exists to conclude that (1) throughout most of the 2023-2024 school year, the all-gender restroom across from the Main Office at Southside posed safety concerns to students; (2) during the 2023-2024 school year, the location and height of Southside's changing table did not comply with the ADA, and the placement of the changing table impeded the purpose of having an all-gender restroom on each floor at Southside; (3) during the 2022-2023 and 2023-2024 school years, Allis and Southside's field trip approval process was inadequate; (4) throughout the 2023-2024 school year, Ms. Torres conveyed to Ms. Gribb through the roles and responsibilities document that Ms. Gribb alone was responsible for Southside's laundry; (5) during all of the 2022-2023 school year and some of the 2023-2024 school year, Allis and Southside's procedures were inadequate related to who should call a student's parent after the nursing staff examined a student; and (6) until March 2024, Southside's playground contained hazards to students.

Please contact me if anything in this report requires further explanation or follow-up. Thank you.

Very truly yours,

Renning, Lewis, & Lacy, s.c.

A handwritten signature in black ink, appearing to read 'Laura E. Pedersen', with a stylized flourish at the end.

Laura E. Pedersen



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December 20, 2024

Mankah Mitchell
Ben Roovers
Office of Legal Counsel
Madison Metropolitan School District
545 W. Dayton Street
Madison, WI 53703

Re: Summary of the Parent Complaint Investigation into Allegations
Against Annabel Torres

Dear Attorneys Mitchell and Roovers:

On or about June 13, 2024, the Madison Metropolitan School District (District) formally engaged the services of Renning, Lewis, & Lacy, s.c., to investigate a complaint raised by parents of students at Southside Elementary School (Southside)¹ against Assistant Principal Annabel Torres. You explained the need for a prompt, thorough, fair, and impartial investigation followed by the preparation of an investigative report. We said we understood.

After beginning our investigation into the Parent Complaint, it became apparent that some allegations raised by parents overlapped with allegations raised by current and former staff members of Southside who brought a separate complaint, which the District engaged our services to investigate on or about May 20, 2024 (Staff Complaint). Because of the overlapping nature of those allegations, this summary relates to allegations raised in both the Parent and Staff Complaints.

Between July 2, 2024, and July 26, 2024, we conducted interviews with Ms. Torres, eight (8) parents, and current and former District employees. We also reviewed the records provided to us by the District, the Complainants, Ms. Torres, and other current and former District employees.

Below is a summary of our findings and conclusions, after considering all of the evidence collected during our investigation:

¹ Prior to the 2023-2024 school year, the school was named Frank Allis Elementary (Allis). Some of the allegations arise out of conduct that occurred at Allis.

1. **Buddy Rooms.** Substantial evidence does exist to conclude that Ms. Torres' placement of students into Buddy Rooms for extended periods of time violated the District's Behavior Education Plan (BEP). In particular, by placing four (4) students in Buddy Rooms for over a month without full access to grade-level instruction support, [REDACTED]

[REDACTED] Ms. Torres denied staff members, who had a legitimate educational interest in understanding the placements, access to such information. Additionally, substantial evidence does exist to conclude that the staff at Southside, under Ms. Torres' direction, used Buddy Rooms inconsistently and Ms. Torres did not provide guidance on the use of Buddy Rooms. Even if Ms. Torres intended the use of Buddy Rooms to align with the District's "Regulation Breaks" or "Planning Spaces" document, the use of Buddy Rooms for extended periods of time with no documentation did not adhere to those documents.

Substantial evidence does not exist to demonstrate that Ms. Torres placed students in Buddy Rooms for extended periods of time based on their race; rather the evidence demonstrates that Ms. Torres did so to address safety concerns.

The facts supporting these conclusions include, but are not limited to:

a. Student A [REDACTED]

- i. Ms. Torres and Principal Candace Terrell assigned Student A to the Buddy Room in February 2024 for three (3) weeks.² [REDACTED]

ii. [REDACTED]

iii. [REDACTED]

² Ms. Torres and Ms. Terrell reported different reasons for Student A's initial placement in the Buddy Room, and others familiar with the placement believed that Ms. Torres and Ms. Terrell placed Student A in a Buddy Room [REDACTED]

³ Because many of members of these Teams overlap, evidence as to which Team(s) were involved in circumstances, remained unclear at times. As such, this findings letter refers to both Teams.

- iv. At times, Student A would sleep during class or play on a computer while in the Buddy Room.
- v. [REDACTED] told Ms. Torres that [REDACTED] did not believe that Southside staff were helping Student A be successful by keeping him in the Buddy Room without grade-level support.

b. Student B, [REDACTED]

- i. At the beginning of March 2024, [REDACTED] brought Student A to [REDACTED] Buddy Room. On or about April 9, 2024, [REDACTED] created a support plan for Student B that allowed Student B to return to the classroom full time if Student B met certain expectations for two (2) weeks. Student B returned to [REDACTED] classrooms full time around the beginning of May 2024.
- ii. [REDACTED] prepared work for Student B to do work at the [REDACTED] level because Student B could not complete grade-level material independently in the Buddy Room.

c. Student C, [REDACTED]

- i. In December 2023, the [REDACTED] placed Student C in [REDACTED] classroom; however, because Student C continued to exhibit problematic behaviors in [REDACTED] classroom and [REDACTED] on or about February 6, 2024, Ms. Terrell moved Student C to the [REDACTED]. At the end of April 2024, Student C returned to the classroom for a half (½) day. Student C continued to access the Buddy Room until the last week of the 2023-2024 school year.
- ii. Student C received small group work from [REDACTED] and [REDACTED] would check on Student C in the office.
- iii. On three (3) occasions, Student C [REDACTED]

d. Student D, [REDACTED]

i. On or about March 13, 2024, Student D started in [REDACTED] Buddy Room during an investigation into Student D's conduct. At the beginning of April 2024, [REDACTED] told Ms. Torres and Ms. Terrell that the Buddy Room may not be "a safe place" for Student D, given the age difference from [REDACTED] students. From approximately April 19 through April 25, 2024, Student D worked with [REDACTED] before returning full time to [REDACTED] classrooms with support.

ii. [REDACTED] prepared independent work for Student D. Because Student D could not do the work independently, Student D required [REDACTED] help.

e. Teacher Concerns. On or about April 9, 2024, during a [REDACTED] Collaboration Team meeting, which included Ms. Torres, the [REDACTED] Teachers discussed whether Buddy Room interventions for Students A, B, and D were working.

The [REDACTED] Teachers previously raised concerns at a Collaboration Team meeting about the use of Buddy Rooms in October 2023. At that time, they expressed not knowing why students were removed, when to hold restorative conversations, how long students would be in a Buddy Room, or what work the students would need to complete. They also wanted more consistency and communication with respect to Buddy Rooms.

f. Lack of Buddy Room Guidance. When asked for such guidelines related to Buddy Rooms, Ms. Terrell and Associate Superintendent of Elementary Schools Chelsey Tubbs produced the "Regulation Breaks" and "Planning Spaces" documents.

i. The "Regulation Breaks" document relayed that "breaks" could be used proactively, reactively, or as an early intervention. Such "breaks" must be documented and should occur, if possible, in the least restrictive environment.

ii. The "Planning Spaces" document stated that such spaces are "an alternative classroom," but are "NOT intended to be a destination" or "punitive measure." Such assignments must be documented. Contrary to the "Planning Spaces" document that conveyed that such spaces were less restrictive than Buddy Rooms, the "2023-2024

School-Wide Behavior Response Process” treats such spaces and Buddy Rooms as equivalent or interchangeable.

- iii. The term Buddy Room has been used in two (2) manners at Southside, creating some confusion as to what the term means.⁴

- g. Lack of Documentation. Ms. Torres did not document the use of Buddy Rooms with the four (4) students.

- 2. **Walker Circle.** Substantial evidence does not exist to conclude that Ms. Torres violated the District’s BEP by allowing teachers to use the Walker Circle. In accordance with the Walker Circle guidelines, Ms. Torres allowed teachers to use the Walker Circle to “teach accountability” to students and expected teachers to hold restorative conversations with students in conjunction with the Walker Circle. Additionally, substantial evidence does not exist to conclude that Ms. Torres violated Board Policy 4610 – Wellness – in relation to the Walker Circle. Ms. Torres offered the Walker Circle as an option for teachers to allow students to engage in physical activity, while holding students accountable. Nonetheless, because teachers did not always hold restorative conversations during the Walker Circle, observers may not have seen its restorative value.

Substantial evidence does exist to conclude that the expectations for the Walker Circle have been applied inconsistently. Not all teachers called parents when they assigned the Walker Circle, and guidelines related to such calls lacked consistency.

The facts supporting these conclusions include, but are not limited to:

- a. Ms. Torres allowed teachers to use the Walker Circle as an accountability/restorative measure for students and provided teachers with Walker Circle guidelines, which instructed that the Walker Circle was to be used if students were “not following expectations and refused to fix [their behavior].” Teachers were required to have restorative conversations with students. The guidelines did not indicate whether teachers must contact parents of students who were assigned to the Walker Circle. The absence of an obligation to contact parents of students who were assigned to the Walker Circle was inconsistent with the “Quick Reference Guide: Responses to Common Behaviors,” which required teachers to call parents if teachers handled behavioral matters, including when assigning Walker Circle.
- b. Students were not required to walk during the Walker Circle; some did not.

⁴ In one instance, Buddy Rooms referred to a component of grade-level Collab Labs and in another instance, they described a circumstance where students were removed to another classroom/ environment by their own volition or at the direction of a staff member.

- c. Some teachers held restorative conversations with students while students were in the Walker Circle; some held those conversations at alternate times.
- d. Some teachers contacted parents of students who were assigned to the Walker Circle; some did not. Ms. Terrell said that she advised teachers to call parents of students who were assigned to the Walker Circle, but Ms. Torres acknowledged that some teachers likely did not contact parents.
- e. Upon receiving concerns that the use of the Walker Circle was akin to a prison yard, the Southside School Based Leadership Team (SBLT) engaged in conversations about the use of the Walker Circle and determined that data should be collected to determine how the Walker Circle was being used. In addition, Ms. Torres reached out to community members and prisoners to receive feedback about whether the practice was akin to a prison yard – the feedback indicated it was not. Additionally, Ms. Torres worked with restorative justice practitioner Rudy Bankston to address concerns about the use of the Walker Circle.
- f. The Complainants did not produce evidence to support a conclusion that the Walker Circle was disproportionately used with students of color.

3. **Working Lunch.** Substantial evidence does not exist to conclude that Ms. Torres violated the District's BEP by allowing teachers to use Working Lunch with students. According to guidelines on Working Lunch, Working Lunch was to be used to "repair harm and teach accountability" with students. Ms. Torres expected teachers who used Working Lunch with students to do so in accordance with that focus.

Substantial evidence does exist to conclude that the Working Lunch expectations have been applied to students inconsistently. The guidelines on Working Lunch are inconsistent with the guidelines in the "Quick Reference Guide: Responses to Common Behaviors" document as to whether teachers need to call parents. Additionally, the evidence demonstrated that very few teachers used Working Lunch with students, which created disparities as to which students were assigned to Working Lunch.

The facts supporting these conclusions include, but are not limited to:

- a. The guidelines pertaining to Working Lunch stated that the measure could be used in response to a student missing instruction/work. Teachers had the option to utilize Working Lunch as an accountability measure but needed to "[h]ave a restorative conversation with [their] student(s)." The guidelines did not speak to parent contacts. Dissimilarly, the "Quick Reference Guide: Responses to Common Behaviors," required teachers to call families if the teachers responded to behavioral matters, including when assigning Working Lunch.

- b. Very few teachers used Working Lunch with students, but those who did, signed students up prior to lunch to ensure that the Working Lunch supervisor got all students a lunch to eat while at Working Lunch.
- c. Because very few teachers used Working Lunch with students, tracking data related to Working Lunch would not demonstrate a large enough cross-section of students to determine if students of color were disproportionately assigned to Working Lunch.

- 4. **Traffic Concerns.** Substantial evidence does exist to conclude that Southside's Traffic Plan was outdated for much of the 2023-2024 school year. However, substantial evidence does exist that the Southside Safety Team did not have adequate time to prepare a finalized Traffic Plan because the school opened approximately eight (8) days prior to the 2023-24 school year.

Substantial evidence does not exist to conclude that Ms. Torres failed to take reasonable steps to remedy the traffic concerns related to Southside.

- 5. **Weapon Possession.** Substantial evidence does not exist to conclude that Ms. Torres failed to address students bringing weapons to school.
- 6. **Graduation.** Substantial evidence does not exist to conclude that Ms. Torres threatened students with not being permitted to attend graduation.
- 7. **Field Trips.** Substantial evidence does not exist to conclude that Ms. Torres prevented any students from attending field trips.
- 8. **Summer School.** Substantial evidence does exist to conclude that Ms. Torres did not invite some students with behavior challenges to attend summer school, but those decisions related to the lack of behavioral supports available during summer school and such decisions aligned with District practices.
- 9. **Student F.** Substantial evidence does not exist to conclude that Ms. Torres failed to address physical attacks on Student F. The evidence demonstrates that Ms. Torres, Ms. Terrell, and others acted reasonably to address all concerns brought to them about Student F.
- 10. **Student G.** Substantial evidence does exist to conclude that there were significant behavioral challenges in Student G's class and that those behavioral challenges negatively impacted Student G. Nonetheless, substantial evidence does exist to conclude that Ms. Torres made reasonable efforts to address those concerns.

11. **Student H.** Substantial evidence does exist to conclude that Student H's classroom presented significant safety concerns during the [REDACTED] school year, which led Student H to visit the Nurse on multiple occasions. However, substantial evidence also does exist to conclude that Ms. Torres made reasonable efforts to address concerns from Student H's parents.
12. **Student I.** Substantial evidence does not exist to conclude that Ms. Torres failed to address bullying concerns related to Student I.
13. **Student J.** Substantial evidence does not exist to conclude that Ms. Torres failed to address serious incidents of bullying endured by Student J. Substantial evidence does not exist to conclude that Ms. Torres [REDACTED].
14. **Student K.** Substantial evidence does exist to conclude that Ms. Torres did not respond in a timely manner to Student K's mother's [REDACTED], email.

The facts supporting these conclusions include, but are not limited:

- a. At the beginning of May 2024, [REDACTED].
 - b. On [REDACTED], Student K's mother sent Ms. Torres and Ms. Terrell an email to relay her concerns about the classroom environment and expressed frustrations about [REDACTED].
 - c. Ms. Torres responded two weeks later on [REDACTED], and arranged a meeting with herself, Ms. Terrell, and Student K's parents.
15. **Student E.** Substantial evidence does not exist to conclude that Ms. Torres failed to communicate with Student E's parents after they learned about Student A [REDACTED] to Student E.

Substantial evidence does exist to conclude that Ms. Torres did not communicate with Student E's parents in a timely manner after the [REDACTED], email from Student E's mother.

The facts supporting these conclusions include, but are not limited to:

- a. On or about [REDACTED] Student E's mother sent Student E's teacher an email asking about Student A's transition back to the classroom. The teacher forwarded the email to Ms. Torres and Ms. Terrell. Ms. Terrell said that she and Ms. Torres would reach out to Student E's mother.
- b. On or about [REDACTED] Student E's mother contacted Ms. Torres and Ms. Terrell asking for the same information requested on [REDACTED].

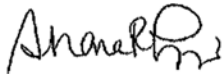
- c. On or about [REDACTED] Student E's teacher sent Ms. Torres and Ms. Terrell an email, stating that Student E's mother was looking for a plan of support for Student E.

16. **Retaliation of Students after Parent Contact.** Substantial evidence does not exist to conclude that some students received "more severe punitive discipline" after their parents raised complaints.
17. **Lack of/Inadequate Behavior Response.** Substantial evidence does exist to conclude that response times to behavior support calls were inadequate during the 2023-2024 school year. However, substantial evidence does exist to demonstrate that Ms. Torres has worked with others to address those matters.

Please contact us if anything in this report requires further explanation or follow-up. Thank you.

Very truly yours,

Renning, Lewis, & Lacy, s.c.



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December 20, 2024

Mankah Mitchell
Ben Roovers
Office of Legal Counsel
Madison Metropolitan School District
545 W. Dayton Street
Madison, WI 53703

Re: Summary of the Staff Complaint Investigation into Allegations
Against Annabel Torres

Dear Attorneys Mitchell and Roovers:

On or about May 20, 2024, the Madison Metropolitan School District (District) engaged the services of Renning, Lewis, & Lacy, s.c., to investigate a complaint from current and former Southside Elementary School (Southside)¹ staff members against Assistant Principal Annabel Torres. On or about May 8, 2024, the Complainants submitted an addendum to the Complaint. On or about June 28, 2024, and July 30, 2024, the Complainants submitted updates to the Complaint.

Between July 9, 2024, and October 30, 2024, we, Attorneys Shana Lewis and Laura Pedersen, conducted interviews of fifty-two (52) current and former District employees, including the following Complainants²: Kindergarten Teacher Dawn Dennis; Community School Resource Coordinator (CSRC) Mary Grace Falk; Bilingual Resource Specialist (BRS) Jenn Garthwaite; Fifth Grade Teacher Laura Gerber; Special Education Assistant (SEA) Nikki Goodnature; Occupational Therapist (OT) Elizabeth Hesse; Speech Language Pathologist (SLP) Michelle Hoefts-DeBot; Substitute Teacher Josh Jenkins; First Grade Dual Language Immersion (DLI) English Teacher Erin Kerwin; Kindergarten DLI Teacher Karen MacDonald; Strings Teacher Marie McManama; Second Grade Teacher Elizabeth O'Leary; Bilingual Resource Teacher (BRT) Nobel Perez; Village Builder turned Family Liaison Burnett Reed; Fourth Grade Teacher Anne Schmidt; First Grade Teacher Lori Shackett; and Kindergarten Teacher Tracey Woock.³

¹ Southside opened its doors eight (8) days prior to the 2023-2024 school year. Prior to the 2023-2024 school year, the school was in a different location in Madison, Wisconsin, and was named Frank Allis Elementary School (Allis). As such, some of the former staff members were only with the school when it was Allis.

² Because some of the staff members left Southside and/or the District or have a different position than at the time most relevant to the allegations in the Complaints, the positions in this report reflect the positions held by respective staff members at the time most relevant to the allegations in the Complaints.

³ We made efforts to conduct interviews with Complainants Theresa Abing, Angie Bouffiou, and Linda Nee as well. However, Ms. Abing and Ms. Bouffiou never responded, and Ms. Nee repeatedly advised us that she was unavailable to meet.

We also interviewed Associate Director of Labor and Organizing for Madison Teachers Inc. (MTI) Pamela Ferrill (i.e., the Complainants' MTI Representative) and Ms. Torres. In addition, we reviewed documents provided by the District and current and former District employees.

Below is a summary of our findings and conclusions, after considering all of the evidence collected during our investigation:

1. **Age Discrimination.** Substantial evidence does not exist to conclude that Ms. Torres engaged in age discrimination toward Dawn Dennis, Nikki Goodnature, Karen MacDonald, Anne Schmidt, or Lori Shackett. Even if Ms. Torres engaged in age discrimination toward those employees, the District properly denied those claims on the basis that they were time barred by Board Policy 8012 – Nondiscrimination – Staff/Visitors.

The facts supporting these conclusions include, but are not limited to:

- a. Board Policy 8012 contains a three hundred (300) day statute of limitations. The age discrimination complainants filed their complaint on March 8, 2024, but all of their allegations occurred over three (300) days prior to submitting the complaint (i.e., their allegations occurred before May 13, 2023).
 - b. Ms. Terrell and Ms. Torres surplused three (3) individuals during the 2022-2023 school year: Ms. Dennis, Ms. MacDonald, and a third individual who was under the age of forty (40).
2. **Race Discrimination.** The District previously investigated Family Liaison Burnett Reed⁴ and Special Education Assistant (SEA) James Robinson's race discrimination claims. As such, we did not investigate those allegations further. With respect to Bilingual Resource Teacher (BRT) Nobel Perez's race discrimination claims against Ms. Torres, Ms. Perez could not articulate any examples of such discrimination, and as such we were unable to conclude that Ms. Torres discriminated against Ms. Perez on the basis of race.
3. **Sex Discrimination.** Substantial evidence does not exist to conclude that Ms. Torres engaged in sex discrimination toward Erin Kerwin, Elizabeth O'Leary, or Tracey Woock. Even if Ms. Torres had engaged in sex discrimination toward Ms. Woock, her claims would be time barred by the three hundred (300) day statute of limitations in Board Policy 8012. Neither Ms. Kerwin nor Ms. O'Leary produced evidence that Ms. Torres engaged in sex discrimination toward them. More specifically, Ms. Kerwin and Ms. O'Leary did not demonstrate that they were harmed in relation to their allegations that Ms. Torres discriminated against women by issuing them warnings for not turning in lesson plans on time. Additionally, the comparators offered by Ms. Kerwin and Ms. O'Leary were not true comparators because they held positions subject to different expectations. Finally, the evidence demonstrates that male teachers received comparative walkthrough feedback and

⁴ Prior to becoming a Family Liaison, Mr. Reed served as the Village Builder at Allis.

coaching support when they were not meeting expectations. The facts supporting these conclusions include, but are not limited to:

- a. Ms. Kerwin, Ms. O'Leary, and Ms. Woock filed their complaint on March 8, 2024, but all of Ms. Woock's allegations occurred over three (300) days prior to submitting the complaint.
 - b. To constitute sex discrimination under Board Policy 8012, Ms. Kerwin and Ms. O'Leary needed to produce evidence that Ms. Torres engaged in any action or operated under a policy or practice that was "detrimental to a person or group of persons [that] differentiate[d] or distinguish[e]d among persons... based upon their sex."
 - c. Ms. Torres expected Kindergarten through Fifth Grade Teachers to turn in lesson plans every Friday. The same was not true for 4K Teachers or BRTs. Ms. Kerwin and Ms. O'Leary offered a male BRT and male 4K Teacher as comparators with respect to the lesson planning allegation.
 - d. Ms. Kerwin and Ms. O'Leary alleged that female teachers received written warnings for not turning in lesson plans. However, neither Ms. Kerwin nor Ms. O'Leary received such a warning.
 - e. All teachers received walkthrough feedback from the CORE Team (i.e., Instructional Coach Lauren Morris, Positive Behavior Support (PBS) Coach Karen O'Donnell, Ms. Terrell, and Ms. Torres). A spreadsheet utilized by the CORE Team shows that both male and female teachers received scores of "Not Evident."
4. **Elvehjem Database.** Substantial evidence does exist to conclude that Southside staff members had access to confidential and personally identifiable information about Elvehjem's staff and students.

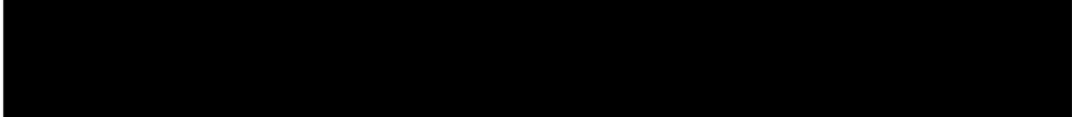
Substantial evidence does not exist to conclude that Ms. Torres shared confidential or personally identifiable information with anyone outside of the District. The facts supporting these conclusions include, but are not limited to:

- a. During the Summer of 2023, Ms. Terrell, Ms. Torres, and Ms. Morris went to Elvehjem Elementary School (Elvehjem) multiple times to observe Elvehjem's Early Literacy Instruction, given that Elvehjem was a District leader in such Instruction. Elvehjem's Instructional Coach Bobbi Campbell shared Elvehjem's resources, including a spreadsheet entitled, "Dashboard," which had several links to documents containing confidential and personally identifiable information about Elvehjem staff and students.
- b. Prior to the 2023-2024 school year, Ms. Terrell added a copy of the "Dashboard" to Southside's shared drive for the purpose of improving upon Southside's own practices in relation to the Early Literacy Program.

- c. Ms. Torres knew the "Dashboard" existed on the shared drive but did not know that it contained confidential or personally identifiable information.
 - d. Throughout the 2023-2024 school year and into the 2024-2025 school year, the document continued to contain confidential and personally identifiable information related to Elvehjem students and staff.
 - e. Ms. Torres did not share the "Copy of Dashboard" document or its contents with anyone outside of Southside.
5. **Excessive Monitoring/Use of Cameras.** Substantial evidence does not exist to conclude that Ms. Torres violated Board Policy 6702 by using security cameras to appraise staff performance. Although Ms. Torres used security cameras to investigate employee misconduct and to determine a student's whereabouts, she did not utilize such footage to appraise staff performance. The facts supporting this conclusion include, but are not limited to:
- a. Leadership Team Meeting notes shared between Ms. Terrell and Ms. Torres from September 2023 indicate that Ms. Terrell and Ms. Torres utilized security cameras to confirm Mr. Robinson's whereabouts on or about September 12, 2023.
 - b. On or about February 12, 2024, Ms. Torres reviewed video surveillance to observe how long Mr. Robinson had Student C out of Ms. Kerwin's classroom. Ms. Torres confirmed via video that Mr. Robinson took Student C from Ms. Kerwin's classroom for ten (10) minutes.
 - c. On or about February 13, 2024, Ms. Torres sent Ms. Kerwin an email stating that despite a prior reminder to Ms. Kerwin that she needed to call the office any time a student left her classroom for more than ten (10) minutes, Ms. Torres confirmed "in person and via video footage that [Student C] was out of the classroom with [Mr. Robinson] for 10 minutes" on February 12, 2024.
 - d. On or about March 11, 2024, in a Letter of Expectation (LOE) dated March 7, 2024, Ms. Torres again advised Ms. Kerwin that she verified "via video footage" that Student C "was out of the classroom again with [Mr. Robinson] for 10 minutes."
6. **Fire Drill Procedures/Evacuation Map/Safety Plan.** Substantial evidence does exist to conclude that Southside's fire evacuation procedures were inadequate through half of the 2023-2024 school year. Substantial evidence does exist to conclude that Southside's Safety Plan was outdated for much of the 2023-2024 school year, thereby violating Wis. Stat. § 118.07(4)(bm). That said, Ms. Tubbs addressed those concerns in March 2024.

Substantial evidence does not exist to conclude that Ms. Torres violated Employee Handbook Section 3.50 by failing to supply employees with adequate fire evacuation maps during the 2023-2024 school year. Substantial evidence does not exist to conclude that Ms. Torres violated pages 73 and 76 of the District's

Safety Plan 2023-2026. The facts supporting these conclusions include, but are not limited to:

- a. Southside opened its doors approximately eight (8) days prior to the 2023-2024 school year. As such, the School Safety Team did not have adequate time to prepare a finalized Safety Plan prior to the 2023-2024 school year starting, so Southside's Safety Plan contained information pertinent to Allis.
- b. On or about August 31, 2023, Ms. Terrell and Ms. Torres met with Director of Cross Systems and Critical Response Gina Aguglia related to Southside's emergency procedures. At that time, they placed bags on teachers' doors that contained clipboards related to Southside's emergency procedures, including what to do in the event of a fire.
- c. On or about September 13, 2023, Ms. Terrell and Ms. Torres also handed out a document entitled "Southside Evacuation Map Outside," which depicted where grade-level classes should line up outside; the map did not depict where Specials classrooms, the Main Office and Health Office, or Related Services classrooms were supposed to line up. Nonetheless, Ms. Torres also sent staff an email about where classes should exit the building

- d. During the fire drills between September 13, 2023, and January 10, 2024, students on the third floor all exited the building using the Northwest stairwell, which created delays in exiting the building. Meanwhile, the Southeast stairwell was not used by any students on the third floor.
- e. After the January 10, 2024, fire drill, Substitute Teacher Josh Jenkins discovered that Badger Rock Middle School (Badger Rock)⁵ equipment had been stored in the stairwell. Mr. Jenkins told Building Custodian II Dulce Bacallao and Senior Administrative Clerk Annette Williams, and they worked with Badger Rock Principal Joseph Rosas to remove the equipment.
- f. During the Spring semester of the 2023-2024 school year, Ms. Torres worked with Mr. Rosas on a plan to allow some third-floor classes to use the Southeast stairwell for the remainder of the 2023-2024 school year.
- g. On or about March 19, 2024, Associate Superintendent of Elementary Schools Chelsey Tubbs reviewed Southside's Safety Plan after Ms. Ferrill sent Interim Superintendent Lisa Kvistad and the Board an email on March 14, 2024, advising that Southside's Safety Plan was outdated. Ms. Tubbs revised some information, contacted Ms. Aguglia and Director of School Security Services Sedric Morris regarding other concerns, and advised Ms. Terrell and Ms. Torres to update Southside's evacuation/reunification plan.

⁵ Badger Rock is in the same building as Southside.

- h. On or about March 22, 2024, Ms. Terrell and Ms. Torres updated the evacuation/reunification plan.

7. **Personnel Actions Taken for Frivolous Violations and/or Matters Ms. Torres Violated.** Substantial evidence does not exist to conclude that Ms. Torres disciplined employees for not wearing safety vests or reporting to assigned duties. As such, the Complainants' contention that Ms. Torres disciplined staff members for violating expectations Ms. Torres did not adhere to is unsupported. The facts supporting these conclusions include, but are not limited to:

- a. Prior to the 2023-2024 school year, Ms. Terrell and Ms. Torres gave staff the "Southside Active Supervision Expectation" document, which reminded staff to wear orange safety vests at morning, afternoon, and recess duties.
- b. On or about November 13, 2023, during a meeting after school, Ms. Torres stated on a call that she was not at her assigned duty and asked the person whom she was on the call with to find someone to cover her duty.
- c. On multiple occasions throughout the 2023-2024 school year, Ms. Torres sent staff members reminder emails to wear their safety vests and report to their assigned duties. Ms. Torres, however, did not discipline any staff members regarding such matters.
- d. On or about May 7, 2024, the Complainants took a photo of Ms. Torres not wearing her safety vest at an assigned duty.
- e. On or about May 10 and 14, 2024, the Complainants took photos of Ms. Torres allegedly not at her assigned duty. On May 10, 2024, however, Ms. Torres was out of the office. On May 14, 2024, the photo does not adequately confirm whether Ms. Torres failed to report to her assigned duty, given that an electrical post blocks part of the area.

8. **Seclusion.** Substantial evidence does exist to conclude that Community Schools Resource Coordinator (CSRC) Mary Grace Falk and Family Liaison Marisa Lukesic monitored the seclusion room and held the door closed to the seclusion room. However, Ms. Torres did not assign Ms. Falk or Ms. Lukesic to do so, nor was Ms. Torres aware that they were holding the door closed.

Substantial evidence does not exist to conclude that the seclusion room at Allis or Southside contained fixtures that could injure a student in violation of Wis. Stat. § 118.305(2)(c). The facts supporting these conclusions include, but are not limited to:

- a. The Allis and Southside seclusion rooms were damaged at times (e.g., paint peeled, holes punched in the wall, and spilled food/drinks); however, no evidence was produced that suggested that objects or fixtures in the room could injure a student in violation of Wis. Stat. § 118.305(2)(c).

- b. Members of the Mobile Response Team (MRT), which included Behavioral Education Assistant Samuel Cox, Psychologist Tasha Larson-Lohmiller, Ms. O'Donnell, Social Worker Maxwell Smith, Ms. Terrell, and Ms. Torres, instructed Ms. Falk and Ms. Lukesic to monitor students in the seclusion room at Allis and hold the door closed, despite Ms. Falk and Ms. Lukesic not being trained in Nonviolent Crisis Intervention protocols. Ms. Torres, however, did not assign Ms. Falk or Ms. Lukesic to do so nor know that they were holding the door closed.

- 9. **Special Education Non-Compliance.** Substantial evidence does exist to conclude that by assigning Cross-Categorical (CC) Teachers to substitute teacher positions, Ms. Torres hindered Southside's ability to offer students Free Appropriate Public Education (FAPE). More specifically, Ms. Torres assigned CC Teachers to serve as substitute teachers during times that CC Teachers were obligated under the Individuals with Disabilities Education Act (IDEA) to provide students with FAPE via Specially Designed Instruction (SDI). In fact, in some cases, Ms. Torres seemed to prioritize general education teacher planning time above the obligations of CC Teachers under the IDEA. Substantial evidence does exist to conclude that Ms. Torres attended IEP meetings with her camera off for portions of virtual IEP meetings.

Substantial evidence also does exist to conclude that at least two (2) students, who were entitled to special education and related services, did not receive those services for months. However, the evidence does not exist to conclude that Ms. Torres was responsible for the failure to provide such special education and related services. The facts supporting these conclusions include, but are not limited to:

- a. Ms. Torres assigned teachers to substitute teacher positions when Allis and Southside were unable to fill substitute teacher positions. During the 2022-2023 school year, Ms. Torres used CC Teachers to fill such roles, and identified during this investigation, that she could only use CC Teachers, Specials Teachers, BRTs, the Instructional Coach, Advanced Learning Teachers, Ms. Terrell, or herself to fill such roles.
- b. During the 2022-2023 school year, Ms. O'Leary and CC Teacher Marissa Kovarik tracked the number of hours Ms. Torres assigned CC Teachers to substitute teacher positions – six (6) CC Teachers worked just under four hundred sixty-eight (468) collective hours in substitute teacher positions. Because some of those hours included teacher planning time and because Ms. Torres tried to assign CC Teachers to substitute teacher positions where they could continue to offer SDI to their students, Ms. O'Leary and Ms. Kovarik's data does not reflect the exact number of SDI minutes lost.
- c. On or about May 1, 2023, when Ms. Kovarik told Ms. Torres that Ms. Kovarik "would really prefer" not to substitute teach after Ms. Torres requested Ms. Kovarik fill in for a music teacher from 11:40 AM – 1:40 PM, Ms. Torres advised Ms. Kovarik that "[c]ancelling music would leave [the grade-level] teachers with less prep."

- d. On or about May 16, 2023, when Ms. Kovarik told Ms. Torres that Ms. Kovarik could not fill in for the REACH teacher, Ms. Torres responded, "all of our CC and BRT staff have had to make adjustments." [REDACTED]
- e. For more than six (6) months during the [REDACTED] school year, [REDACTED] did not receive [REDACTED] that [REDACTED] was entitled to pursuant to [REDACTED]'s IEP. By the time the oversight was discovered in [REDACTED], [REDACTED] had to be provided [REDACTED] compensatory services. Because Ms. Torres was not the LEA Representative for [REDACTED], Ms. Torres did not have responsibility for the oversight.
- f. For over two (2) months during the [REDACTED] school year, [REDACTED] did not receive [REDACTED] services that [REDACTED] was entitled to pursuant to [REDACTED]'s IEP. By the time the oversight was discovered in [REDACTED], [REDACTED] had to be provided [REDACTED] compensatory services. Because Ms. Torres was not the LEA Representative for [REDACTED], Ms. Torres did not have responsibility for the oversight.

10. **Standardized Testing Non-Compliance.** Substantial evidence does not exist to conclude that Ms. Torres required students who moved to the United States within twelve (12) months prior to testing to complete the Forward Exam ELA assessment. Substantial evidence does not exist to conclude that Ms. Torres pushed to have more students tested than permitted at the same time. Substantial evidence does not exist to conclude that Ms. Torres pushed to have multiple subjects tested at the same time. Substantial evidence does not exist to conclude that Ms. Torres required students to test without adequate privacy equipment. Substantial evidence does not exist to conclude that Ms. Torres required students to test without adequate audio equipment. Substantial evidence does not exist to conclude that Ms. Torres failed to respond to requests for proctor training. Additionally, while substantial evidence exists to conclude that Southside lacked staff for administering such testing, substantial evidence does not exist to conclude that Ms. Torres was in any way responsible for the lack of staffing.

Despite much of the evidence demonstrating that Ms. Torres complied with testing requirements and best practices, substantial evidence does exist to conclude that Ms. Torres had a misunderstanding about the difference between the available Forward exam supports (i.e., Stacked Translations with Spanish Text-to-Speech (TTS), Separate Setting, and Small Group Translation (SGT)). The facts supporting these conclusions include, but are not limited to:

- a. On or about November 6, 2023, when Director of Multilingual Programs and Services Leah Zepeda Vaughn sent Ms. Torres an email stating that Southside's English as a Second Language (ESL) and BRT staff told Ms. Zepeda Vaughn that they would like additional training for ACCESS testing,

Ms. Torres agreed to allow Southside staff members to attend training offered by Ms. Zepeda Vaughn's office.

- b. On or about December 1, 2023, Ms. Torres sent Southside's test administrators an email telling test administrators where to find ACCESS testing supplies, including headphones. Ms. Torres also reminded test administrators that there could "be up to 15 students testing with the same administrator," so Ms. Torres encouraged them to "pull as many as [they could] so testing [was] efficient." On or about December 6, 2023, Ms. Torres reiterated testing up to fifteen (15) students for efficiency purposes, in an email to Ms. Perez. Such guidance complied with the Department of Public Instruction (DPI) "Test Security Manual," which states that "[a]s a general rule, one proctor for every 15 students is recommended."
- c. On or about December 5, 2023, Mr. Jenkins asked Ms. Torres if they had "portable testing dividers." Ms. Torres responded, "No... We just have regular folders." Nothing in DPI's testing manuals indicates that portable testing dividers are required; rather, the manuals state that students need to be seated far enough apart to allow for privacy or have some type of partition to minimize any ability to observe other students' tests.
- d. On or about February 14, 2024, the District's Research, Assessment, and Improvement (RAI) Department provided District schools with a spreadsheet for testing administrators to designate supports needed for students on Forward testing. The RAI identified that TTS was added as a universal support for Forward testing, which would allow Spanish speakers to be supported with Stacked Translations (Spanish/English) with Spanish TTS. As a result, SGT would not be available to Spanish speakers. The RAI also stated that "DPI allows for a one-time exemption from ELA portions of the exam only for those students" who were newly enrolled from another country within the past twelve (12) months.
- e. On or about March 8, 2024, Mr. Jenkins sent Ms. Torres an email asking whether Southside should be offering SGT to Spanish speakers. Ms. Torres responded that "some students have testing in a small group setting as a designated support" and in those circumstances, "with up to 4 students, [proctors were] able to make sure [that students were] accessing those embedded test accommodations."
- f. On or about March 14, 2024, through March 18, 2024, Bilingual Resource Specialist (BRS) Jenn Garthwaite sent Ms. Torres emails asking whether the "[SGT] accommodation [was] necessary [] since TTS [was] available" and stating that for Spanish-speakers, "no additional translation can be provided beyond the stacked translations." Ms. Torres responded that BRTs and BRSs went through grade-level lists with grade-level teachers to determine testing accommodations a month prior. Ms. Torres advised that "[i]t [was] past the deadline... [to] change any decisions."

- g. Prior to Forward testing, Ms. Torres created a schedule, which included separate testing dates and times for different subject matters and grade levels. That said, in some makeup instances, however, Southside needed to test students at the same time in different grade levels and subject matters to comply with the Forward testing window.
 - h. Southside began Forward testing students on or about March 19, 2024, and finished all makeup exams on or about April 17, 2024, approximately seven (7) school days prior to DPI's testing window end date (i.e., April 26, 2024).
 - i. On or about March 20, 2024, Mr. Jenkins sent Ms. Torres and DLI Second Grade Teacher Jessica Real an email stating that Mr. Jenkins "kn[e]w [they] identified a group of students who were overlooked in setting up the right accommodations" on March 19, 2024. Mr. Jenkins stated he confirmed with Assessment Technician Sarah Wollner that "accommodations [could] be added up until the point when a student logs in to a particular test." Mr. Jenkins also stated that the "most critical accommodations [] overlooked for G3 DLI [were] the stacked translations with TTS. Mr. Jenkins clarified that "some students identified for [SGT]... likely [] need[ed] [] TTS Spanish." Mr. Jenkins later added, "[t]he students who were given [SGT] will need the Stacked/Spanish TTS option instead of [SGT]." Ms. Torres responded, "So none of those students should get separate setting?" Mr. Jenkins replied, "Separate setting is a different accommodation."
 - j. On or about March 21, 2024, Mr. Jenkins asked Ms. Real via email whether her students received the correct accommodations, and Ms. Real responded, "students who I had not listed for the translations got them, but the ones who needed them did not." During this investigation, Ms. Real estimated that approximately twelve (12) of her eighteen (18) students did not receive the appropriate supports during Forward testing.
 - k. On or about [REDACTED] Ms. Torres sent Ms. Wollner an email stating that Southside had a student [REDACTED] needed an exemption from the ELA portion of the test. Ms. Wollner confirmed on April 23, 2024, that the student would be exempt from the ELA assessment.
 - l. Before standardized tests, the test administrators determined how many headphones were available in each class to ensure that students had the necessary audio equipment for standardized testing.
11. **Mary Grace Falk.** Substantial evidence does not exist to conclude that Ms. Torres retaliated against Ms. Falk in violation of Board Policy 8012. More specifically, Ms. Falk did not allege that she was the complainant or a witness in a complaint filed under Board Policy 8012. Additionally, although Ms. Falk suggested that Ms. Torres retaliated against Ms. Falk for engaging in a protected activity, Ms. Falk's purported protected activity (i.e., bringing concerns about Ms. Terrell to the attention of others), would not be covered under Title VII of the Civil Rights Act of 1964 or Board Policy 8012 because she was not participating in an Equal

Employment Opportunity (EEO) process or opposing discrimination.⁶ Moreover, Ms. Falk demonstrated an inability to meet job expectations, despite considerable support and reminders from Allis and District administration. Substantial evidence does not exist to conclude that Ms. Torres subjected Ms. Falk to a hostile work environment in violation of Board Policy 8012. More specifically, Ms. Falk did not allege that Ms. Torres harassed her on the basis of any protected class, as required for such a claim. The facts supporting these conclusions include, but are not limited to:

a. **Allis' Community Schools Resource Team (CSRT).**

- i. During the 2022-2023 school year, the District expanded its Community Schools program by adding a Community School at Allis under a new project (i.e., the Village Builder Project).
- ii. On or about October 3, 2022, Allis hired Ms. Falk as the Community Schools Resource Coordinator (CSRC) for Allis' Community Schools Resource Team (CSRT). Shortly thereafter, Allis hired Ms. Lukesic as the Family Liaison. In early December 2022, Allis hired Mr. Reed as the Village Builder. Ms. Falk served as the leader of the CSRT.
- iii. Until March 2023, the District's Community Schools Manager position was vacant, so Family Youth Community Engagement Coordinator Cesar Sanchez, supervised by Director of Equity, Diversity, Engagement, & Inclusion Adam Clausen, provided professional development to Ms. Falk. During this investigation, Mr. Sanchez stated that he was unaware of training available for CSRCs before taking on the position, and multiple people confirmed that training and instruction was lacking.

b. **MRT Response.**

- i. Shortly after Ms. Falk started as the CSRC, Ms. Terrell and Ms. Torres asked Ms. Falk to help support the MRT, by providing proactive behavioral supports to students whom the CSRT supported. Despite that, Ms. Falk took a reactive role in helping the MRT (i.e., responding to behavioral incidents) until December 2022.
- ii. In December 2022, Ms. Terrell told Ms. Falk to refrain from helping the MRT altogether because Ms. Terrell wanted Ms. Falk to focus on her responsibilities as CSRC. Ms. Falk admitted during this investigation that even after Ms. Terrell asked her not to assist the MRT in December 2022, Ms. Falk did so on one (1) occasion.

⁶ See <https://www.eeoc.gov/laws/guidance/enforcement-guidance-retaliation-and-related-issues#A. Protected.>

c. **Ms. Terrell and Ms. Torres' Communications/Meetings with Mr. Clausen and/or Mr. Sanchez.**

- i. In October 2022, Ms. Terrell and Ms. Torres met with Mr. Sanchez and asked him to help support Ms. Falk in certain areas (e.g., securing volunteers).
- ii. Ms. Terrell and Ms. Torres also spoke with Mr. Clausen and Mr. Sanchez on December 20 and 21, 2022, regarding next steps in supporting Ms. Falk.
- iii. In January 2023, Ms. Terrell and Ms. Torres worked with Mr. Clausen and Mr. Sanchez on issuing Ms. Falk a Program Support Plan (PSP).

d. **Ms. Falk's Communications/Meetings with Mr. Clausen and/or Mr. Sanchez.**

- i. On or about November 16, 2022, Ms. Falk met with Mr. Sanchez, at Ms. Falk's request. She stated that she did not feel the CSRC position aligned with the job description and expressed that she did not believe the CSRT could function until Allis hired a Village Builder.
- ii. In early December 2022, Ms. Falk told Mr. Sanchez that she did not feel supported by Ms. Terrell or Ms. Torres and wanted a transfer.
- iii. On or about March 6 and 9, 2023, Ms. Falk reiterated her transfer request to Mr. Clausen and Mr. Sanchez. Ms. Falk wanted to transfer into a Family Liaison position. Mr. Clausen and Mr. Sanchez said she would need to speak with Human Resources.
- iv. At a March 14, 2023, meeting, Ms. Annis, Human Resources Risk Manager Kathryn Wingier, and Ms. Stanford advised Ms. Falk that because Ms. Falk was on a PSP she could not be transferred.

e. **Volunteers.** Between November 29, 2022, and February 16, 2023, Ms. Terrell and/or Ms. Torres provided no less than seven (7) reminders to Ms. Falk with respect to her responsibility for securing volunteers, connecting with families for volunteer purposes, and entering volunteer lists into the HUB (i.e., a shared spreadsheet for the CSRT to enter relevant work, which Mr. Clausen and Mr. Sanchez provided in early December 2022).

f. **MENU Day.** Ms. Terrell and Ms. Torres tasked the CSRT with organizing MENU Days in which students who demonstrated positive characteristics could spend "dojo" points on activities or items. Between November 29, 2022, and March 2, 2023, Ms. Terrell and/or Ms. Torres provided no less than seven (7) reminders to Ms. Falk with respect to her responsibilities for MENU Day (e.g., ordering items and tracking student points).

g. **Purchase Orders.** Ms. Terrell and Ms. Torres tasked Ms. Falk with ordering supplies for school events and items for MENU Days. Ms. Terrell and Ms. Torres told Ms. Falk to submit purchase orders to Ms. Shorette Ogden at least two (2) weeks in advance for supplies and one (1) week in advance for MENU Day items. Between early December 2022, and March 13, 2023, Ms. Terrell and/or Ms. Torres provided no less than six (6) reminders of those obligations and asked for status updates on such orders no less than three (3) times.

h. **PSP.**

i. On or about January 23, 2023, Ms. Terrell and Ms. Torres issued Ms. Falk a PSP, which identified several deficiencies, [REDACTED]

[REDACTED] Ms. Terrell and Ms. Torres listed several expectations for Ms. Falk, including but not limited to, communicate CSRT priorities with administration on a weekly basis, complete a list of volunteers and update the list in the HUB; order supplies for school events at least two (2) weeks in advance).

ii. On or about March 3, 2023, Ms. Terrell issued Ms. Falk a Written Verbal Warning [REDACTED]

iii. On or about March 24, 2023, Ms. Terrell issued Ms. Falk a Written Reprimand [REDACTED]

iv. On or about April 28, 2023, Ms. Terrell issued Ms. Falk Investigation Findings [REDACTED]

i. **Termination/Resignation.**

i. At the beginning of May 2023, Ms. Annis, Ms. Terrell, and Ms. Torres discussed the possibility of terminating Ms. Falk.

ii. On or about May 5, 2023, Ms. Falk resigned in lieu of termination.

12. **Michelle Hoeffs-DeBot.** Substantial evidence does not exist to conclude that Ms. Torres retaliated against Ms. Hoeffs-DeBot in violation of Board Policy 8012. Additionally, although Ms. Hoeffs-DeBot suggested that Ms. Torres retaliated against her for engaging in an alleged protected activity (i.e., bringing special-education noncompliance concerns to the attention of Associate Superintendent of Student Services Nancy Molfenter and Associate Director of Special Education and Section 504 Scott Zimmerman), under Title VII, Ms. Hoeffs-DeBot's claim would fail because she did not demonstrate that Ms. Torres retaliated against Ms. Hoeffs-DeBot for participating in an EEO process or for opposing discrimination.

From a practical standpoint, however, because the LOE issued by Ms. Terrell and Ms. Torres was dated April 9, 2024, the LOE should not have contained details relating to incidents occurring after April 9, 2024. The facts supporting these conclusions include, but are not limited to:

- a. On or about [REDACTED], Ms. Torres and Ms. Kambwa-Bell called Ms. Hoeffs-DeBot to the office to ask why Ms. Hoeffs-DeBot was not providing services to [REDACTED]. Ms. Hoeffs-DeBot told them she did not have [REDACTED] on her caseload. Ms. Hoeffs-DeBot later advised Dr. Molfenter and Mr. Zimmerman of the oversight.
 - b. On or about January 31, 2024, Ms. Terrell and Ms. Torres assigned Ms. Hoeffs-DeBot to bus duty because Mr. Reed, who previously filled that duty, [REDACTED]. Additionally, Ms. Hoeffs-DeBot had yet to be assigned to a duty.
 - c. On or about [REDACTED], Ms. Hoeffs-DeBot attended a virtual IEP meeting where two (2) individuals who were not included on the meeting notice to the student's parents attended the meeting and where an alternate LEA Representative appeared, despite a lack of notice to the student's parents. After the meeting, Ms. Hoeffs-DeBot encouraged Ms. Johnson to report the compliance concerns to Mr. Zimmerman.
 - d. On or about March 18, 2024, Ms. Hoeffs-DeBot did not show up for her 1:10 PM bus duty after an IEP meeting that ended at 1:04 PM. On March 19, 2024, Ms. Terrell sent Ms. Hoeffs-DeBot an email [REDACTED].
 - e. On or about April 23, 2024, Ms. Torres sent Ms. Hoeffs-DeBot an email about Ms. Hoeffs-DeBot failing to show up to an IEP meeting.
 - f. On or about April 24, 2024, Ms. Hoeffs-DeBot left her bus duty early.
 - g. On or about May 17, 2024, Ms. Terrell and Ms. Torres met with Ms. Hoeffs-DeBot to issue her an LOE dated April 9, 2024. The LOE detailed two (2) events that occurred prior to April 9, 2024 (i.e., Ms. Hoeffs-DeBot advising Ms. Johnson to notify Mr. Zimmerman about the problems with the [REDACTED] IEP meeting, and not reporting to her bus duty after an IEP meeting). The LOE also detailed two (2) events that occurred after April 9, 2024 (i.e., not reporting to an IEP meeting and leaving bus duty early). Ms. Terrell and Ms. Torres directed Ms. Hoeffs-DeBot to direct questions to the LEA Representative, attend all IEP meetings, and follow assigned duties.
13. **Erin Kerwin.** Substantial evidence does not exist to conclude that Ms. Torres retaliated against Ms. Kerwin in violation of Board Policy 8012. More specifically, Ms. Kerwin did not allege that she was the complainant or witness in a discrimination complaint or investigation, as required under Board Policy 8012 to support a claim for retaliation.

Substantial evidence does exist to conclude that the LOE issued by Ms. Torres contained incorrect information. The facts supporting these conclusions include, but are not limited to:

- a. On or about February 5, 2024, with Ms. Kerwin's knowledge, Mr. Robinson took Student C from Ms. Kerwin's classroom for twenty-six (26) minutes to help Student C co-regulate. Mr. Robinson did not support Ms. Kerwin's classroom and Student C did not have an IEP. When Ms. Torres discovered that Student C was out of Ms. Kerwin's classroom with Mr. Robinson, Ms. Torres advised Ms. Kerwin that she needed to call the office any time a student left the classroom for more than ten (10) minutes.
- b. On or about February 12, 2024, with Ms. Kerwin's knowledge, Mr. Robinson took Student C from Ms. Kerwin's classroom for ten (10) minutes due to Student C being upset about an incident with another student.
- c. On or about February 13, 2024, Ms. Torres sent Ms. Kerwin an email advising that Ms. Torres confirmed via surveillance video that Mr. Robinson took Student C for ten (10) minutes on February 12, 2024. Ms. Torres reiterated that Ms. Kerwin needed to call the office when any student left the classroom for more than ten (10) minutes.
- d. On or about March 4, 2024, Mr. Robinson submitted a complaint against Ms. Torres.
- e. On or about March 11, 2024, Ms. Torres issued Ms. Kerwin an LOE. The LOE stated that "On February 12th, 2024, [Ms. Torres and Ms. Kerwin] discussed [Student C] being out of the classroom [with Mr. Robinson] for 26 minutes," and Ms. Torres expected that Ms. Kerwin would "call for support if a student [was] unaccounted for, for more than 10 minutes." The LOE also stated on February 13, 2024, Ms. Torres "verified in person and via video footage that [Student C] was out of the classroom again with the same staff member," and Ms. Torres expected "that if a student ha[d] behavior issues that a member of the [MRT] [] take the student."

14. **Marie McManama.** Substantial evidence does not exist to conclude that Ms. Torres retaliated against Ms. McManama, in violation of Board Policy 8012, when Ms. Torres issued Ms. McManama a Written Verbal Warning. Substantial evidence does not exist to conclude that Ms. Torres targeted Ms. McManama because of her part-time status or her advocacy of the Strings program. The facts supporting these conclusions include, but are not limited to:

- a. On or about December 16, 2022, Fifth Grade Teacher Laura Gerber's students attended Strings class. Some students refused to take out instruments and some talked over Ms. McManama. Ms. McManama called the office for help, and Ms. Torres responded; however, Ms. McManama did not feel Ms. Torres' response was effective. When Ms. Gerber picked up the students, Ms. McManama gave Ms. Gerber a report of the students'

behavior and said Ms. Torres' response was ineffective. Ms. Torres, who was out in the hallway, said to Ms. McManama, "We will talk about this later." Ms. Torres then sent Ms. McManama a Written Verbal Warning,



- b. Eight (8) days prior to the 2023-2024 school year, Southside opened.
 - c. On or about August 25, 2023, Ms. Terrell and Ms. Torres assigned Ms. McManama to Room 3017, which Ms. McManama did not believe was large enough to accommodate her classes. Ms. McManama raised concerns with Ms. Terrell and Ms. Torres about the space and Ms. McManama's missing furniture and instruments. Ms. Terrell told Ms. McManama that Southside was in the process of assessing enrollment and room assignments and said if Ms. McManama could make Room 3017 work, it would help Southside.
 - d. On or about August 26, 2023, Ms. McManama brought her concerns to the Director of Arts Education, Dan Davidson, and continued to do so until September 8, 2023, when Ms. McManama said, "It's gotten to the point at Southside that I simply do not have the things I need to do my job. In fact I am writing this email from the floor of my office space/classroom, since I still do not have a desk chair. I am measuring kids and beginning to assign instruments today and that is as far as I can go." Mr. Davidson shared Ms. McManama's email with Ms. Tubbs, who sent the email to Ms. Terrell. Ms. Terrell responded to Mr. Davidson and Ms. McManama stating, in part:

[Ms. McManama], we spoke last week... I made you aware that I would not be considering moving your space until after 3rd Friday due to enrollment.... I made you aware that the old chairs were not conducive to the space... and that Svetlin was ordering a set of chairs.... You were instructed to use the SGI space... for storage of instruments and to take a desk and chair from 3016.... I am ultimately confused at this mixed messaging and equally concerned at the false accusations.... In the future please continue to speak with us.
 - e. On or about September 12, 2023, Ms. McManama responded, thanking Ms. Terrell and apologizing for Ms. McManama's "lack of communication." Ms. McManama also said she "clearly misunderstood" Ms. Terrell's instructions.
 - f. On or about September 22, 2023, Ms. McManama moved into her preferred classroom and the Strings classroom was ready for use by students.
15. **Nobel Perez.** Substantial evidence does not exist to conclude that Ms. Torres retaliated against Ms. Perez in violation of Board Policy 8012. Additionally, although Ms. Perez suggested that Ms. Torres retaliated against her for engaging in alleged statutorily protected activity (i.e., advocating for herself and her students), under Title VII, Ms. Perez's claim would fail because she did not

demonstrate that Ms. Torres retaliated against her for participating in an EEO process or for opposing discrimination. Substantial evidence does not exist to conclude that Ms. Torres subjected Ms. Perez to a hostile working environment. Substantial evidence does not exist to conclude that Ms. Torres misrepresented the purpose of the Performance Improvement Plan (PIP) meeting with Ms. Perez. The facts supporting these conclusions include, but are not limited to:

a. Sondag Reading Intervention.

- i. On or about September 27, 2023, Ms. Torres arranged to have Program Support Teacher (PST) Darlinne Kambwa-Bell provide one-on-one (1:1) training in administering Sondag assessments.
- ii. Despite conveying to Ms. Kambwa-Bell on October 18, 2023, that Ms. Perez understood the training and expectations related to Sondag, Ms. Perez demonstrated deficiencies in using Sondag



b. Benchmark Reading Intervention.

- i. On or about November 15, 2023, Ms. Torres asked Ms. Perez if she was familiar with Benchmark materials.
- ii. On November 20, 2023, Ms. Perez was not using Benchmark interventions or doing progress monitoring, as indicated by walkthrough observations.
- iii. On or about November 27, 2023, Ms. Perez told Ms. Terrell that Ms. Perez did not have access to Benchmark interventions. Ms. Torres reminded Ms. Perez that she did not need formal training to start using Benchmark materials.
- iv. On or about December 13, 2023, Ms. Torres demonstrated progress monitoring for Ms. Perez.
- v. On or about December 15, 2023, Ms. Torres met with Ms. Perez to plan for Benchmark interventions and data recording.

c. Fastbridge Learning Intervention.

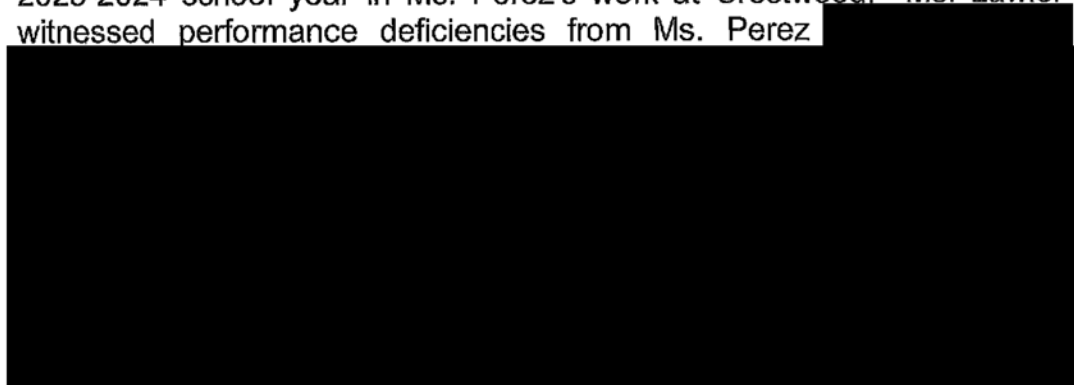
- i. On or about November 15, 2023, Ms. Torres told Ms. Perez that she needed to be doing Fastbridge testing. Ms. Perez responded that she did not have access to the curriculum.

- ii. On November 20, 2023, Ms. Terrell observed Ms. Perez teaching and learned that Ms. Perez was not using Southside's Fastbridge curriculum for Spanish interventions. Ms. Kambwa-Bell responded saying that Ms. Perez was at the training related to Fastbridge curriculum and received an email that advised her to use the classroom teacher's computer for access to the curriculum.
- iii. On or about November 27, 2023, Ms. Perez told Ms. Terrell that Ms. Perez had not yet started Fastbridge progress monitoring.
- iv. On or about November 29, 2023, Ms. Torres met with Ms. Perez to show Ms. Perez how to administer Fastbridge testing.
- v. On or about December 16, 2023, Ms. Torres told Ms. Perez that Fastbridge progress monitoring needed to be completed biweekly.

d. **Small Group Work.**

- i. On or about December 1, 2023, Ms. Torres arranged for another teacher to support whole group instruction so Ms. Perez could focus on small group instruction.
- ii. On or about December 15, 2023, Ms. Torres met with Ms. Perez to plan for small group work, which Ms. Torres expected Ms. Perez to conduct immediately; after the meeting, Ms. Perez sent Ms. Torres Ms. Perez's notes from the meeting, which stated that small group work should wait until after ACCESS testing.
- iii. On December 16, 2023, Ms. Torres clarified that small group work could not wait until after testing.

- e. **PIP.** On or about January 19, 2024, Crestwood Elementary School (Crestwood) Principal Kelly Lawler, Ms. Terrell, and Ms. Torres issued Ms. Perez a PIP. Ms. Lawler supervised Ms. Perez during the 2022-2023 and 2023-2024 school year in Ms. Perez's work at Crestwood. Ms. Lawler witnessed performance deficiencies from Ms. Perez



Ms. Lawler, Ms. Terrell, and Ms. Torres identified several deficiencies in the PIP, [REDACTED]

[REDACTED] Ms. Lawler, Ms. Terrell, and Ms. Torres relayed that they expected Ms. Perez to, among other things: consistently use interventions; complete biweekly progress monitoring; implement small group work by January 22, 2024; and speak with Ms. Terrell and/or Ms. Torres directly with any Southside-related concerns.

The following day, Ms. Perez took off work [REDACTED] through the end of the 2023-2024 school year, before resigning on June 7, 2024.

In summary, substantial evidence exists to conclude that Ms. Torres hindered Southside's ability to offer students FAPE by assigning CC Teachers to fill substitute teacher positions, misunderstood the available Forward exam supports, and issued an LOE to Ms. Kerwin that contained incorrect information.

Please contact us if anything in this report requires further explanation or follow-up. Thank you.

Very truly yours,

Renning, Lewis, & Lacy, s.c.



Shana R. Lewis



Laura E. Pedersen

Annabel Torres

Response to Findings

Staff Complaint

1. Substantial evidence does not exist.
2. Substantial evidence does not exist for this claim from Nobel Perez, and the district already investigated claims by B. Reed and J. Robinson and found the claims to not be founded.
3. Substantial evidence does not exist.
4. c. Annabel knew the "Dashboard" existed, but also believed it was in a folder that was only accessible to certain staff, such as the Instructional Coach, PBIS Coach, Principal and herself. It was a model template from Elvehjem that we were planning on using to improve our data tracking after having collaborated with the Instructional Coach and Principal. Annabel, Candace, and Lauren never requested that any link within the "Dashboard" be open for viewing.
 - e. Annabel did not share the "Dashboard" with anyone outside of the Core groups, which consisted of the Instructional Coach, PBIS Coach, Candace and herself. Furthermore, and importantly, it was never brought to Annabel's attention that someone from the Core team (Lauren Morris) had placed the "Dashboard" into a document that all Southside staff could access, until it was listed in the formal complaint.
5. Substantial evidence does not exist.
6. Claim: Southside fire evacuation procedures were inadequate for part of the school 23/24.
 - a. [Email chain between Gina Aguilia](#) and Annabel Torres requesting additional materials and support beginning on August 8, 2023. This was a new building and all rooms needed safety materials, including materials for evacuation drills. All were installed before the first day of school.
 - b. and f. On 8/8/23, Annabel and Joseph Rosas met and discussed the Fire Drill joint schedule between Badger Rock and Southside. Annabel sent the calendar invites per this conversation. Exit doors were also discussed. Since Badger Rock was using their [REDACTED] and stairwell to exit their students, Annabel, Candace, Joseph, and Gina decided to divide grades 1-5 Southside student exits through Southside's 3 doors, plus use Badger Rock's [REDACTED] only for 4K and 1st grade students. Joseph and Annabel collaborated after each of the first fire drills regarding evacuation time and efficiency. After re-evaluating the evacuation procedures, hearing feedback from staff, and Joseph adjusting where some of Badger Rock students exited, we jointly determined that it was possible to have some of the

students from the third floor use the Badger Rock stairwell to exit during an evacuation drill. This adjustment occurred mid-way through the 23/24 school year. That is not something that could have been predicted without having run actual fire drills, timing, and adjusting to the new space.

After each safety drill, Southside's response team met to discuss how the drill went and shared that feedback with staff.

Additionally, Annabel and Joseph communicated regularly regarding Fire Drills. Annabel sent out emails with instructions and reminders to all parties before fire drills.

[Email check in before October Fire Drill.](#)

Communication regarding [January Fire Drill](#) to all relevant planning staff at Southside and Badger Rock.

C. [Email to staff from Annabel](#) in September restating (from what was shared during the Welcome Back information) where students were to evacuate from and line up outside. This was also shared during the investigation. It clarifies where all classrooms and areas are to evacuate from. This email addresses where specials classes and sections of each floor were to evacuate from.

E. Southside and Badger Rock were aware of materials in Badger Rock's hallway near the stairwell. With construction still being completed, it took Badger Rock time to move their things. Southside had no additional storage space to offer. The objects in the hallway did not block or impede access to the stairwell, doors, or elevator.

G. As soon as Annabel was made aware of updates that needed to be made, she made the adjustments and scheduled a zoom meeting with Sedric and Gina to go over the Safety Plan, which was approved. The original 23/24 Safety Plan was completed and shared by Annabel on . Annabel never received feedback with any updates or additions that needed to be made. Annabel referred to the previous year's Safety Plan and the training modules shared by Gina and Sedric during Principal professional development. Annabel received the Safety Plan document from Candace on October 5th, and completed all required parts by October 17th. When Chelsey Tubbs met with Lisa Kvistad and Pamela Ferrill on March 19, minimal changes were made. Attached is the Safety Plan. Please see editing history to confirm this information. This was also presented as evidence in the investigation. Annabel worked within a reasonable timeframe to complete this task, and although this document was shared with Candace Terrell, Gina Aguilar, Sedric Morris, Chelsey Tubbs, Roxanne Amundson, and Anna Miller, nobody provided feedback stating anything needed to be adjusted or updated until the formal complaint was filed. Once we were told that changes needed to be made, the changes were discussed with Gina and Sedric and made in less than 2 days.

7. Substantial evidence does not exist.

8. Substantial evidence does not exist.

9. The MMSD Employee Handbook serves as a comprehensive resource outlining the rights and responsibilities of both staff and administration. While it does not explicitly detail the process for assigning substitute teachers, it provides general guidelines on district policies and procedures. Annabel followed those policies and procedures, along with guidance observed first-hand in her observations and interactions with administrators in her previous role as a New Educator Instructional Mentor for MMSD. Annabel assigned a variety of teachers to sub in classes when there were no subs available. She tried to align subbing for CC teachers so that they subbed in classrooms in which they already supported students on their caseload, so as to provide more time with those students. Annabel tried to limit time subbing to a half of a day in order to give CC teachers time to deliver SDI minutes. Subbing duties were shared between CC teachers, specials teachers, BRT/ESL teachers, instructional coaches, and herself. Annabel worked with individual teachers to cover for them during times when they were asked to sub, but had a small group at the same time. When possible, alternate subbing arrangements were made. Annabel covered subbing so that those CC teachers could lead their small groups and deliver SDI minutes. Annabel worked within the same constraints that all schools worked under and provided a very similar plan of placing staff in coverage roles, while trying to be as equitable as possible.

Example email with 2 CC teachers (1 involved in the complaint) regarding subbing a half a day, and Annabel finding coverage for some of their duties, also stating that they were able to switch and cover each other as needed if it interfered with small groups and SDI minute delivery.

Example email for daily subbing where music was cancelled and classroom teachers needed to "sub" for their class, therefore losing their prep hour. All staff had to sub. Annabel tried to be as equitable as possible in order to respect each staff member's priorities.

Example email of combining classes, so as to not ask CC, BRT, or ESL teachers to sub.

Example email to staff stating a specials was cancelled and classroom teachers needed to sub. This email also shows that Annabel stepped in to support the hour of lunch/recess as to not put extra work on other staff.

Annabel turned her camera off for brief times during IEP meetings when eating or answering her door. There is no district policy that requires cameras to be on for the entire IEP meeting. Annabel used her discretion as to when it was more appropriate to turn a camera off than to have it on. On several occasions the internet did not allow all cameras to be on, so several staff and parents turned their camera off so that the CC teachers presentation could be visible without disruptions.

10. Confusion about difference between

I, Grade level teachers, along with the instructional coach, assigned designated accommodations for students in their classes. Josh Jenkins, who was a part-time sub, disagreed with some of the teacher's decisions, and emailed asking to change the

accommodation. I responded to clarify what he was requesting, since he was communicating with the grade level teacher who had made the initial decisions for accommodations and Sarah Wollner. This does not indicate that I do not know the difference between the two accommodations in question; rather, I inquired as to what he was requesting and what data was behind that decision since it went against what the classroom teacher had decided based on her more extensive knowledge of student needs.

J. Inaccurate accommodation tagging on the actual individual Forward exams was not brought to Annabel's attention, and was not consistent with what was on the Testing Accommodations spreadsheet. There are several parts to the Forward test, so if a discrepancy in accommodations was noticed and not brought to Annabel's attention, then there would have been no way to correct the error.

K. Communicating correct student needs is consistent with Test Administrator duties. This is an example that supports Annabel being knowledgeable regarding language learner needs. Annabel has administered the Access test 16 of her 21 years in MMSD, and has been a test coordinator for 3 years and ESL Department Chair for 6. Her knowledge of tests, testing coordination, testing material needs and organization, and testing accommodations is excellent.

13. The one date on the LOE was incorrect, and Annabel takes responsibility for that error. She would have addressed it if it had been brought to her attention. However, the information within the LOE was correct. There were several instances where James Robinson took a student from Erin Kerwin's class, which is included in the points a, b, c, d, and e. The LEO refers to one particular event, which was the event that lasted the longest time without Erin knowing a student was not in her classroom, and consequently left for recess with the class still without knowing a student was missing and not reporting a student missing. This is a student safety concern that had to be addressed. [The LOE came after in person conversations regarding expectations for monitoring students.](#)

14. Substantial evidence does not exist.

Parent Complaint

1. Buddy rooms: Under Candace's guidance and directives, 4 students were placed into alternative learning spaces as part of a safety plan. Each of those students had plans that included [REDACTED] Staff were assigned to meet each student throughout the day to provide learning support. Subs, [REDACTED] and [REDACTED] were utilized to support these students and their needs. Many other interventions and proactive strategies were implemented first, but proved to be ineffective. These interventions were discussed and reflected on as a team with the PBIS coach, Instructional Coach, Social Worker, BHS worker, School Psychologist, and Chelsae

Tubbs (on several occasions). A few of these strategies were coaching cycles for the teacher from the instructional coach, assistant principal (Annabel), assignment of response team members to support specific students at designated times within their classroom, meetings with parents, restorative conversations, restorative circles to address issues and behaviors, encouraging and supporting families to register to volunteer and support their student in the classroom environment, positive rewards for meeting goals, check-in/check/out sheets, etc. Based on observed and documented incidents, these students' behaviors posed an **imminent risk of harm** to themselves, other students, and/or staff, and a more controlled environment with trained professionals was necessary. In these circumstances, after conferencing with the teachers, families, social worker, school psychologist, and others, we deemed that the least restrictive learning environment for these students was in a separate classroom setting for a short amount of time until the causing factors were addressed. It is important to note that none of the parents of the four students mentioned were involved in this parent complaint because of the frequent and intense communication, collaboration, and shared goals for their students.

Annabel was following the instructions of her direct supervisor. Candace created the plans and communication with the Core team.

- a. Data from the 23/24 school year shows student A made a comparable amount of growth compared to previous years, so the claim that ■ did not receive and grow from grade-level content is not accurate. Annabel created and communicated a solid plan of support for student A and ensured ■ received the related services outlined in ■ IEP, as the evidence supports from the investigation.

G. Annabel was never given guidance on documentation outside of the student safety plans for the four students. Chelsey Tubbs and Candace knew of each situation and neither gave any guidance on what documentation needed to be. District resources provide guidance on documentation for a seclusion and restraint, but this was not a seclusion and restraint for any of the four students since they met with staff, attended specials, attended special education service times, etc.

2. A. As with all restorative practices and behavior issues, teachers have the responsibility and flexibility to communicate with families as they see fit. Guidance was provided and support was given as needed. Teachers had the autonomy to choose this restorative option or not. For example, Megan Mullen did not use Walker's Circle with one student who did not respond to that method, but rather sat on the bench to talk to ■. The restorative purpose of the time was accomplished.

Even within the BEP there are levels and flexibility of responses and consequences. Annabel and Candace did not monitor all teachers in their use and follow up with Walker's circle, but did have conversations with staff, students, and families. Annabel was also often part of restorative conversations. This was one OPTION for staff to use, but they were never obligated to use it.

3. Field Trip Notification: Candace Terrell was the head principal and approved all field trips. Annabel Torres did not. Annabel worked with the information provided by MMSD on field trip guidance, knowledge and expertise of the nursing staff, and under the direct leadership of the principal to collaborate and support field trip efforts, as the evidence supports.

4. Traffic concerns: Candace and Annabel met with Gina Agulgia, Sedric Morris, City of Madison staff, police officers, and others to discuss traffic concerns and patterns throughout the course of the 23/24 school year. In person observations were conducted by Sedric Morris, City of Madison Streets Department, and police. No adverse observations were noted, and areas for improvement were discussed and addressed. With Southside being a new building, the traffic safety protocols and procedures evolved throughout the year based on feedback, observations, and data. Prior to the complaint, there were no student safety concerns that were not addressed through the previously mentioned collaboration efforts.

14. Based on the [REDACTED] email, [REDACTED] was in contact with Erin discussing concerns. As stated in the email, Annabel attempted to call the parent prior to the [REDACTED] email with a personal invite to come in and meet around those concerns and sent an [email to Annette](#), our Admin Clerical, to support the parent [REDACTED].

15. That parent stopped into the office and we discussed her concerns in person. Annabel did respond to the email a week later. This [REDACTED], who worked at [REDACTED] whom we talked on a daily basis. [REDACTED] same concerns, [REDACTED] I responded to them as a whole. The email response was after in person conversations [REDACTED] and one in person conversation with the other parent.

Note: The email response and in person meeting with the parent was done by Annabel, not Candace. Candace also would have been able to contact the parent if she felt that conversations with [REDACTED] family were not sufficient.

A plan of support for student E was discussed in SSIT, and Student Wellness and the school psychologist was in contact with the student and parent. This follow up was a collaborative effort with the most qualified person, Tasha, contacting the student about [REDACTED] supports available after doing some observations, having conversations with the student and teacher.

[Email stating Kim Rein](#), the nurse, should fill out a work order to order necessary supplies for the changing room bathroom.

Email chain where Scott Zimmerman, OT and PT staff (including Sue), Jamie Gribb (school nurse), and the special education staff from central office collaborated and ordered a changing table. Annabel and Candace followed up within the email chain to see what progress was being made with this purchase.

The limitation was the size of the bathroom, and that was an error in the initial planning and design of the building itself between MMSD and Findorff. At the beginning of the year we were informed that the Frank Allis changing table was not able to be moved to Southside and was intended to stay at Frank Allis. Working with multiple departments took time, but Southside administration acted in a timely manner and consulted with the appropriate departments and cannot be solely held responsible for the size of the table not being ADA compliant. That is the responsibility of the special education department and related services to ensure that equipment is ADA compliant.

At Southside, there are 3 gender neutral bathrooms on the first floor, (1 in the nurse's office, one that was mainly used for students with special education changing needs but also was open to everyone, and another approximately 20 feet from this one), 2 on the second floor, and 1 on the third floor. This is not taking into consideration the 6 classrooms that have a gender neutral bathroom on the first floor. Regardless of the intended use of one specific all gender bathroom, there were always multiple other all-gender bathrooms available for use, no fewer than 1 on each floor of Southside Elementary.

- a. Frank Allis has 1 gender neutral bathroom in the basement, 1 on the main floor and none on the second floor. The Southside student population is the same as it was when it was at Frank Allis and Southside now has more gender neutral bathrooms, even if the bathroom mainly used for students with disabilities was not utilized as often.

Responsibilities for ADA Compliance in Wisconsin Schools:

1. **Designated ADA Coordinator:** Wisconsin school districts are required to appoint a Section 504/ADA Coordinator to oversee compliance with disability laws. This individual is responsible for ensuring that the District adheres to ADA standards, including facility accessibility and procurement of compliant equipment. This identified staff member, along with others from the special education and related services should be responsible for this compliance oversight. Candace Terrel, the head principal, who is also certified in Special Education and should have more specific knowledge regarding ADA compliance, should also be held responsible instead of Annabel.
[Wisconsin DPI](#)
2. **Training Requirements:** The District must ensure that the ADA Coordinator and relevant staff receive appropriate and ongoing training related to ADA compliance. This training encompasses understanding regulations, implementing necessary

accommodations, and ensuring that facilities and equipment meet ADA standards.

[Wisconsin DPI](#)

3. **Delegation of Duties:** While the ADA Coordinator holds primary responsibility, it's common for specific tasks, such as ordering equipment, to be managed by departments like Facilities Management or Special Education. However, the overarching responsibility for compliance remains with the district and the ADA Coordinator, not the assistant principal.

Assistant Principal Position and Training:

As an Assistant Principal, unless explicitly assigned, Annabel would not be responsible for the procurement of ADA-compliant equipment. Moreover, as Annabel has not received specific training regarding ADA compliance—a responsibility that lies with the District—this reinforces that such duties were not within Annabel's designated role.

Based on Wisconsin regulations, ensuring ADA compliance, including the procurement of compliant equipment, is primarily the District's responsibility, managed through the appointed ADA Coordinator and relevant departments. Without proper training or explicit assignment, it is unreasonable to hold Annabel accountable for these specific compliance issues.

Important Factors to Note:

1. With regard to the conclusions in the report regarding the changing table and locked storage cabinet not being compliant and deemed a student safety hazard, it takes time to collaborate with multiple teams, go through the approval and ordering process, and finally the installation process. When concerns or needs are brought to Annabel's attention, she consistently seeks support and resources and follows up to ensure the processes are continuing in order to resolve concerns. When these same concerns are brought to the district's attention, it also takes time, even though the district has the capacity to fast-track the process. It is important to note that despite the investigation findings deeming Annabel as having fault in not providing a compliant changing table and locked storage cabinet and therefore causing student safety concerns, those same items are still in place months later as of 3/22/25 in Southside Elementary and have not been remedied. This is noted not to place blame on anyone but to support the fact that making these kinds of changes takes time.
2. With regards to placing students in alternative learning spaces (buddy rooms), it is important to note that this practice is currently in place at Southside (along with other schools within the district), has been in place for weeks, and was put in place by current interim administrators. This is a common practice used to support and protect students.
3. Annabel collaborated with the district staff, multiple staff persons on sight, her direct supervisors, and decisions were made based on information from all available

resources. As a new administrator, she always does her best with the guidance given by the district. The district has not provided clear and timely guidance, but Annabel has used the vague and limited guidance provided along with her knowledge of specific staff, student, and family needs to provide the best possible services to her school community.

4. Annabel has attended and taken advantage of all district training and despite being new to an administrative role and a role in an elementary school, she has taken on all tasks assigned under the guidance of Candace.
5. None of the concerns brought forth in the complaint were presented to Annabel prior to the official filing of the complaint. Reasonable action was not taken on the part of MTI, staff, or families to collaborate with Annabel or Candace.
6. Annabel has been an exemplary employee of MMSD for 21 years and has never had anything placed on her employee file. She has dedicated her entire career to supporting the students and families in this district. As a bilingual educator and administrator, she is an asset to MMSD.

First linked document “Email chain between
Gina Aguglia” – Link Broken – Document(s)
Not Provided

1st request – July 11, 2025

2nd request – July 21, 2025

3rd request – July 31, 2025

4th request – August 4, 2025



Annabel Torres <altorres@madison.k12.wi.us>

Fire Drill

4 messages

Joseph G Rosas <jgrosas@madison.k12.wi.us> Tue, Oct 10, 2023 at 5:24 PM
Reply-To: Joseph G Rosas <jgrosas@madison.k12.wi.us>
To: Annabel Torres <altorres@madison.k12.wi.us>, cvterrell@madison.k12.wi.us, skrodriguez@madison.k12.wi.us, Joseph G Rosas <jgrosas@madison.k12.wi.us>

Hello Candace and Annabel,
Have you had a chance to check in with Dulce about the Fire Drill tomorrow at 9am?
I know last time, Jeremy from Findorf had to show Odell how to use the new system.

Joey

Fire Drill

Wednesday Oct 11, 2023 - 9am – 9:15am (Central Time - Chicago)

Guests

Annabel Torres - organizer
cvterrell@madison.k12.wi.us
Joseph G Rosas
skrodriguez@madison.k12.wi.us

Annabel Torres <altorres@madison.k12.wi.us> Wed, Oct 11, 2023 at 3:47 AM
To: Joseph G Rosas <jgrosas@madison.k12.wi.us>
Cc: Candace V Terrell <cvterrell@madison.k12.wi.us>, Sara K Rodriguez <skrodriguez@madison.k12.wi.us>

Thank you for bringing that up. Are you ok with postponing the drill until tomorrow afternoon? I know Tracy knows how but it'd be a good idea to have both of them see how the system works and have a refresher for Tracy.
Annabel

[Quoted text hidden]

Joseph G Rosas <jgrosas@madison.k12.wi.us> Wed, Oct 11, 2023 at 5:56 AM
To: Annabel Torres <altorres@madison.k12.wi.us>
Cc: Candace V Terrell <cvterrell@madison.k12.wi.us>, Sara K Rodriguez <skrodriguez@madison.k12.wi.us>

How about tomorrow at the same time, 9am? Dulce can train Tracy after she learns the system.

Joey

[Quoted text hidden]

Annabel Torres <altorres@madison.k12.wi.us> Wed, Oct 11, 2023 at 6:23 AM
To: Joseph G Rosas <jgrosas@madison.k12.wi.us>
Cc: Candace V Terrell <cvterrell@madison.k12.wi.us>, Sara K Rodriguez <skrodriguez@madison.k12.wi.us>

Perfect. I'll resend the invite.

[Quoted text hidden]



Annabel Torres <altorres@madison.k12.wi.us>

January Fire Drill

1 message

Annabel Torres <altorres@madison.k12.wi.us>

Wed, Jan 10, 2024 at 9:10 AM

To: Dulce M Bacallao <dmbacallao@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Joseph G Rosas <jgrosas@madison.k12.wi.us>, Tasha A Larson-Lohmiller <talarsonlohm@madison.k12.wi.us>, Maxwell S Smith <mssmith1@madison.k12.wi.us>, Karen L O'donnell <klodonnell@madison.k12.wi.us>, Annette N Williams <anjustice@madison.k12.wi.us>, Benny G Ramirez Gomez <bgramirezgomez@madison.k12.wi.us>

Hello There!

We will have our January fire drill for the 23-24 school year today at 1:45pm. Please be sure to have a **walkie** with you.

If you are **checking a floor**, please make sure your floor is clear of all staff and students. Candace will ask you via walkie if your area is clear and you will respond either clear or not clear (example: "*Basement is clear*"). If your floor is not clear, she will circle back to you.

If you are **checking signs**, please make sure all classrooms in your area are holding up a **green** sign to signal all students are accounted for. Then, Candace will ask you via walkie if your area is clear and you will respond either clear or not clear (example: "*Back is clear*"). If your area is not clear, Candace will circle back to you. **NEW: If your area is missing a student, get information from the classroom teacher missing the student (i.e- where is the student? speech, support team, CC teacher, BRT teacher, ect. and announce this on the walkie right away).**

NEW- PLEASE READ: To eliminate walkie chatter, Candace will be asking us if the building and outside areas are clear instead of us telling her. This will also help her keep track of what is clear and what is not clear. **Candace will be announcing when the BUILDING is all clear. That is when we will stop the timer.**

Checking floors:**1st floor:** Tasha**2nd floor:** Karen**3rd floor:** Max**Checking signs:****Back** Tasha**Front door:** Candace**BR side:** Annabel**Annette-** Timekeeper

Thanks in advance! Please let us know if you have any questions or concerns.



Annabel Torres <altorres@madison.k12.wi.us>

Fire Drill procedures

9 messages

Annabel Torres <altorres@madison.k12.wi.us>
 To: Southside Staff <southside_staff@madison.k12.wi.us>
 Cc: Joseph G Rosas <jgrosas@madison.k12.wi.us>

Wed, Sep 13, 2023 at 7:09 AM

Good morning everyone. Here are the Evacuation Drill procedures:

- 1-When the alarm goes off, line everyone up.
- 2-Remember to take your clipboard with your class roster and the red/green circle.
- 3-Head to the corresponding door.
 - a. 2/3, music, art, and gym go out [REDACTED] and past the Badger Rock driveway. Use the stairwell by the music room.
 - b. 4/5 go down the main stairwell that leads to [REDACTED] and go on the sidewalk past our parking lot.
 - c. 4k/k/1 go out [REDACTED] and out to the park behind our playground. (Note**Badger Rock students are also using this door, so you should stay to the left and they will stay to the right)
- 4-When outside, check your roster and make sure you have all of your students. If you do, hold up the GREEN circle. If you are missing students, hold up the RED circle and find a supervisor immediately. They will radio everyone to locate that student(s). Supervisors will be wearing their vests (Candace, Annabel, Max, Tasha, Sam, Karen).
- 5-When the whistle blows it means that it is all clear to return.

We will be timing how long it takes us to evacuate the building, from the time the alarm goes off to when we clear all floors and everyone is outside. We will give the "All clear" whistle when we know all students are accounted for (all green circles).

If you have any questions, please let us know.

Fire/evacuation drills are unannounced. However, this being the first one of the year in a new building I want to make sure those that want to practice with their class beforehand, or think through how they will lead their class, will have the opportunity to do so this morning.

Annabel

Candace V Terrell <cvterrell@madison.k12.wi.us>
 To: Annabel Torres <altorres@madison.k12.wi.us>

Wed, Sep 13, 2023 at 7:13 AM

Who is checking what floors again for the supervisors?

Candace Terrell
 Southside Elementary-Principal
 608-204-1066
cvterrell@madison.k12.wi.us

"The Highest Human Act is to Inspire"-Ermias Asghedom A.K.A Nip

[Quoted text hidden]

Azela González <agonzalez3@madison.k12.wi.us>
 To: Annabel Torres <altorres@madison.k12.wi.us>

Wed, Sep 13, 2023 at 7:14 AM

Annabel, we don't have the clipboards. Or at least I don't! Where do we find them?

Thanks

On Wed, Sep 13, 2023 at 7:09 AM Annabel Torres <altorres@madison.k12.wi.us> wrote:
[Quoted text hidden]

Annabel Torres <altorres@madison.k12.wi.us>
To: Azela González <agonzalez3@madison.k12.wi.us>

Wed, Sep 13, 2023 at 7:14 AM

There should be one in the bag by the door if you don't have one.
[Quoted text hidden]

Patrick Fait <prfait@madison.k12.wi.us>
To: Annabel Torres <altorres@madison.k12.wi.us>

Wed, Sep 13, 2023 at 7:16 AM

Hi Annabel,

Since our meeting on Monday with the heads-up about the impending Fire Drill, I have been looking like mad for my classroom's Emergency Binder and I cannot find it anywhere! I feel like I am in a good space, organizationally, but simply cannot locate this binder. Is it possible to get a new one or are there any extras?

Thanks,
Pat

On Wed, Sep 13, 2023 at 7:09 AM Annabel Torres <altorres@madison.k12.wi.us> wrote:
[Quoted text hidden]

Annabel Torres <altorres@madison.k12.wi.us>
To: Patrick Fait <prfait@madison.k12.wi.us>

Wed, Sep 13, 2023 at 7:37 AM

We are still updating them, but you can add a roster and Karen will be giving everyone a new green/red paper. There is a clipboard in the bag by the door for now.
[Quoted text hidden]

Karen L O'donnell <klodonnell@madison.k12.wi.us>
To: Annabel Torres <altorres@madison.k12.wi.us>
Cc: Joseph G Rosas <jgrosas@madison.k12.wi.us>, Southside Staff <southside_staff@madison.k12.wi.us>

Wed, Sep 13, 2023 at 7:53 AM

And please check your mailbox for your red/green sign and take it with you when you Evacuate

Be well,
Karen O'Donnell
PBS Coach Southside Elementary
Klodonnell@madison.k12.wi.us
608.622.7573

On Wed, Sep 13, 2023 at 7:09 AM Annabel Torres <altorres@madison.k12.wi.us> wrote:
[Quoted text hidden]

Stacy Smith-Buckley <smithbuckley@madison.k12.wi.us>
To: Annabel Torres <altorres@madison.k12.wi.us>

Wed, Sep 13, 2023 at 5:47 PM

Annabel,
I thought I read yesterday that Reach also goes out [REDACTED] so that is what I did today. Is this correct? I just want to verify this is where I should go for the drill next time.
Thank you,
Stacy

On Wed, Sep 13, 2023 at 7:09 AM Annabel Torres <altorres@madison.k12.wi.us> wrote:

[Quoted text hidden]



Annabel Torres <altorres@madison.k12.wi.us>
To: Stacy Smith-Buckley <smithbuckley@madison.k12.wi.us>

Wed, Sep 13, 2023 at 6:22 PM

Yes, that is correct.

[Quoted text hidden]



Annabel Torres <altorres@madison.k12.wi.us>

Subbing in Anne's class today

3 messages

Annabel Torres <altorres@madison.k12.wi.us>

Thu, Jan 12, 2023 at 4:45 AM

To: Terretha A Morris <tamorris@madison.k12.wi.us>, Marissa N Kovarik <mnkovarik@madison.k12.wi.us>

Cc: Candace V Terrell <cvterrell@madison.k12.wi.us>

Hello. Anne is out today and I would like you to support in that space today.

Here are the [slides](#) and [sub plans](#).

Marissa, can you sub until lunch? (We will look for [REDACTED] in the am) (I will find coverage for your regular recess duty.)

Terretha, can you sub from recess to end of day? (I will find coverage for your regular lunch duty.)

If there are times when you two decide to switch between the two of you to be able to also do a few small groups that is fine with me.

Thank you so much! We really appreciate it.

Annabel

Marissa N Kovarik <mnkovarik@madison.k12.wi.us>

Thu, Jan 12, 2023 at 7:45 AM

To: Annabel Torres <altorres@madison.k12.wi.us>

You will also have to unload the grey badger van to get [REDACTED] off (for me) and [REDACTED] off (for Angie).

[Quoted text hidden]

—
Marissa Kovarik (she/her)
4K and K Special Education Teacher
Frank Allis Elementary

Annabel Torres <altorres@madison.k12.wi.us>

Thu, Oct 10, 2024 at 3:09 PM

To: Laura Pedersen <lpedersen@law-rl.com>

[Quoted text hidden]



Annabel Torres <altorres@madison.k12.wi.us>

Absent Today?

11 messages

Patrick Fait <prfait@madison.k12.wi.us>

Thu, Apr 27, 2023 at 6:54 AM

To: Annabel Torres <altorres@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>

Hello all,

I am so sorry about the extremely late notice, but I am not sure how I will be able to make it into work today. Just a couple of hours ago, [REDACTED] I'm not sure how I can manage to get the kiddos to where they need to go ([REDACTED] is only at half-day 4K) and be at work at the same time.

Elizabeth and Mikayla, I just texted you both a few minutes ago and I am so sorry about the late notice.

Do you think it will be okay to split my kiddos up for the day? I have not had a chance to put together sub plans unfortunately. I would certainly be willing to collect work for my class after I drop my kiddos off at their respective school.

Any thoughts?

Thank you so much!
Pat

Patrick Fait <prfait@madison.k12.wi.us>

Thu, Apr 27, 2023 at 7:17 AM

To: Annabel Torres <altorres@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>

[Here are my Slides for the day.](#)

I am not sure if this is helpful or not, but after I drop [REDACTED] off this morning, I could prep more materials, etc around 9:15.

Ugh!
[Quoted text hidden]

Candace Terrell <cvterrell@madison.k12.wi.us>

Thu, Apr 27, 2023 at 7:31 AM

To: Patrick Fait <prfait@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

Hi Pat,

Hope things improve [REDACTED] I don't feel the best option at this time is to split given the dynamics of some student situations at this time. However, I know we have others out as well. If this is the route taken. Olivia can you plan to adjust schedule for you and James to support these environments more to proactively assist with all that comes with the sudden change?

Best,

Candace

Sent from Yahoo Mail for iPhone

[Quoted text hidden]

Patrick Fait <prfait@madison.k12.wi.us>

Thu, Apr 27, 2023 at 7:38 AM

To: Candace Terrell <cvterrell@madison.k12.wi.us>

Cc: Annabel Torres <altorres@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

I am so sincerely sorry about all of this! The last thing I'd want to do is add more stress to others during an already stressful time of the school year.

If it helps, I will be available from about 9:15 to 11:15. I know that the second graders are at specials during most of this time, but I could come in to prep materials and get my classroom lined-up for a sub (if available) in the afternoon.

[Quoted text hidden]

Candace Terrell <cvterrell@madison.k12.wi.us>

Thu, Apr 27, 2023 at 7:46 AM

To: James L Robinson <jlrobinson@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>

Thanks James! I know Olivia comes in at 9:30am. Could you plan to support O'Leary's space this AM? Then you and Olivia can create a plan for splitting support between Brouette and O'Leary when she arrives.

Sent from Yahoo Mail for iPhone

On Thursday, April 27, 2023, 7:33 AM, James L Robinson <jlrobinson@madison.k12.wi.us> wrote:

I'm down for whatever just let me know.!

On Thu, Apr 27, 2023 at 7:32 AM Candace Terrell <cvterrell@madison.k12.wi.us> wrote:

[Quoted text hidden]

Candace Terrell <cvterrell@madison.k12.wi.us>

Thu, Apr 27, 2023 at 7:49 AM

To: Patrick Fait <prfait@madison.k12.wi.us>

Cc: Annabel Torres <altorres@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

Hi Pat,

Life happens, we will work together to figure it out. Whatever you can prepare I am sure will be helpful.

Sent from Yahoo Mail for iPhone

[Quoted text hidden]

Patrick Fait <prfait@madison.k12.wi.us>

Thu, Apr 27, 2023 at 8:01 AM

To: Candace Terrell <cvterrell@madison.k12.wi.us>

Cc: Annabel Torres <altorres@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

I'll plan on dropping the kiddos off at their schools and then I'll come to Allis to prep materials. I'll have the classroom ready for a sub in the afternoon. If it ends up happening, great. If not, there will be materials ready for my students to work with in the afternoon.

Thank you all!

[Quoted text hidden]

Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>

Thu, Apr 27, 2023 at 8:03 AM

To: Candace Terrell <cvterrell@madison.k12.wi.us>

Cc: Patrick Fait <prfait@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

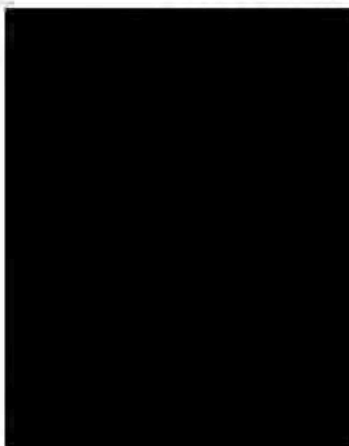
It seems like we are splitting so Mikayla and I just chatted and she is willing to take a couple more kids to help balance out. Also Olivia is not in until 9:30.

Ms. B room:



Ms. O'Leary room:





[Quoted text hidden]

Elizabeth O'Leary, Ms. O'Leary Pronouns: She/Her

2nd Grade Classroom Teacher- Frank Allis Elementary

eaoleary@madison.k12.wi.us School Phone: 608-285-2702

"People will forget what you said, people will forget what you did, but people will never forget how you made them feel." —
Maya Angelou

Candace V Terrell <cvterrell@madison.k12.wi.us>

Thu, Apr 27, 2023 at 8:19 AM

To: Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>

Cc: Patrick Fait <prfait@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

James will start with O'leary. Reed will start in Brouette when he arrives at 8:30am.

Candace Terrell

Frank Allis Elementary-Principal

608-204-1066

cvterrell@madison.k12.wi.us

"The Highest Human Act is to Inspire"-Ermias Asghedom A.K.A Nip

[Quoted text hidden]

Diane M Shorette Ogden <dshorette@madison.k12.wi.us>

Thu, Apr 27, 2023 at 8:20 AM

To: Elizabeth A O'Leary <eaoleary@madison.k12.wi.us>

Cc: Candace Terrell <cvterrell@madison.k12.wi.us>, Patrick Fait <prfait@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

Thanks for the rosters of who is where

On Thu, Apr 27, 2023 at 8:03 AM Elizabeth A O'Leary <eaoleary@madison.k12.wi.us> wrote:

[Quoted text hidden]

--

Interested in volunteering at Allis or chaperoning a field trip with your student's class - start the process by visiting the [Volunteering](#) page at MMSD's website.

• [Front Line Sub Request](#)

- [How To Request A Sub](#)
- [Class Coverage Compensation Link](#)
- [Staff Absence Reporting](#)



*Diane Shorette Ogden
Administrative Clerk Senior
Frank Allis Elementary School
Madison Metropolitan School District
(608) 204 - 1057
Office Hours 8:00am - 4:00pm*

"Life isn't about waiting for the storm to pass. It's about learning how to dance in the rain."

Patrick Fait <prfait@madison.k12.wi.us>

Thu, Apr 27, 2023 at 9:55 AM

To: Diane M Shorette Ogden <dshorette@madison.k12.wi.us>

Cc: Elizabeth A Oleary <eaoleary@madison.k12.wi.us>, Candace Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Mikayla A Brouette <mabrouette@madison.k12.wi.us>, "Olivia R. Quinn" <orquinn@madison.k12.wi.us>, "James L. Robinson" <jlrobinson@madison.k12.wi.us>

It seems like the plan is to keep the kiddos split into Elizabeth's and Mikayla's classrooms this afternoon. I have prepped additional literacy and math work for each student, as well as placing each student's booklet in his or her book boxes. I will stay with my class in LMC and review our expectations for the day while we are in the library.

Thanks again,
Pat

[Quoted text hidden]



Annabel Torres <altorres@madison.k12.wi.us>

Staff absences and coverage

7 messages

Annabel Torres <altorres@madison.k12.wi.us>
To: Allis Staff <allis_staff@madison.k12.wi.us>

Tue, May 30, 2023 at 6:47 AM

Hello all. I hope you had a great long weekend and enjoyed the weather.

Here are the spaces that have subs and that need coverage today.

Claudia Guzman: **Sueli subbing**

Tasha Larson: **out all day**

Blue bus am-Max

Blue bus pm-Josh

Fait lunch supervision from 10:50-Jenn

Abbi Mullen: no sub (Angie 8:05-10:50, Marissa 11:55-end of day)

Mullen lunch support from 11:25-11:55-Reed

REACH: **Grace subbing**

BRT: **Josh subbing**

Candace and Annabel out from 10-11 today.

2/3 lunch-Sam and Reed

k/1 recess-Max

****Walkie coverage will be low during those times. Expect delays and prioritize support team calls for only large issues of safety and harm.**

Have a great (hot) day everyone!

ps--Lori's retirement party is tonight!! Wooh woot:)

Annabel

James L Robinson <jlrobinson@madison.k12.wi.us>
To: Annabel Torres <altorres@madison.k12.wi.us>

Tue, May 30, 2023 at 6:51 AM

I have to wait on my little brothers bus in at 9.

[Quoted text hidden]

Annabel Torres <altorres@madison.k12.wi.us>
To: Allis Staff <allis_staff@madison.k12.wi.us>

Tue, May 30, 2023 at 7:56 AM

Hello all. **Johan** is out today as well. **Music will be cancelled for today.**

James will be in at 9am.

On Tue, May 30, 2023 at 6:47 AM Annabel Torres <altorres@madison.k12.wi.us> wrote:

[Quoted text hidden]

Annabel Torres <altorres@madison.k12.wi.us>

Tue, May 30, 2023 at 7:56 AM

To: James L Robinson <jlrobinson@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Diane M Shorette Ogden <dshorette@madison.k12.wi.us>, Olivia R Quinn <orquinn@madison.k12.wi.us>

James, please check in at the office when you get to work.

Annabel

[Quoted text hidden]

Luis M Armacanqui <lmarmacanqui@madison.k12.wi.us>

Tue, May 30, 2023 at 9:34 AM

To: Annabel Torres <altorres@madison.k12.wi.us>

Cc: Allis Staff <allis_staff@madison.k12.wi.us>

I'll cover Mr. Fait's lunch at 10:50am since Jenn is already covering 2 other lunches.

Luis

On Tue, May 30, 2023 at 6:47 AM Annabel Torres <altorres@madison.k12.wi.us> wrote:

[Quoted text hidden]

Jenn G <jagarthwaite@madison.k12.wi.us>

Tue, May 30, 2023 at 1:08 PM

To: Luis M Armacanqui <lmarmacanqui@madison.k12.wi.us>

Cc: Annabel Torres <altorres@madison.k12.wi.us>

Thanks, Luis!

[Quoted text hidden]

--

Jenn Garthwaite

She/Her/Hers -[What's this?](#)

Bilingual Resource Specialist - Hablo Español

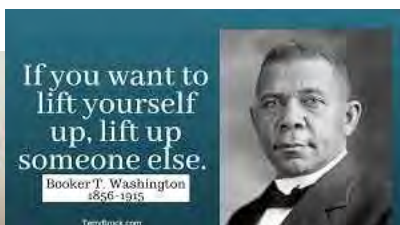
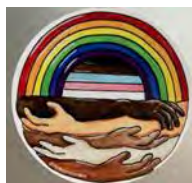
Frank Allis Elementary School

[4201 Buckeye Road](#)

[Madison, WI 53716](#)

Office Phone: 608-204-1017

Text: 608-572-7333



Annabel Torres <altorres@madison.k12.wi.us>

Thu, Oct 10, 2024 at 3:29 PM

To: Laura Pedersen <lpedersen@law-rl.com>

Music cancelled so classroom teachers had to "sub" during that time, instead of pulling a cc teacher or brt in to sub.

Annabel

[Quoted text hidden]



Annabel Torres <altorres@madison.k12.wi.us>

Staff absences and coverage

4 messages

Annabel Torres <altorres@madison.k12.wi.us>
To: Southside Staff <southside_staff@madison.k12.wi.us>

Mon, Oct 23, 2023 at 6:51 AM

Good morning all. I hope you had a great weekend. As a reminder, we will see each other this afternoon in PD in the library.

Johan Galindo: no sub (music canceled)

Jenn G: out all day

ESL: Angie Park

5th grade: no sub (Terretha subbing 7:25-1:00, Annabel cover 4/5 lunch, Stacy to cover 1-dismissal)

Teachers are required to have 4.5 hours of planning a week. We are fortunate to be able to schedule everyone 5 hours (plus collab lab as a bonus), so for those that will not have music today you will still be receiving your 30 minutes of planning. Maggie, your class will have library with SEA support, please take that time to prep.

Have a great day everyone!

Annabel

Annabel Torres <altorres@madison.k12.wi.us>
To: Terretha A Morris <tamorris@madison.k12.wi.us>

Mon, Oct 23, 2023 at 7:22 AM

[Quoted text hidden]

Annabel Torres <altorres@madison.k12.wi.us>
To: Southside Staff <southside_staff@madison.k12.wi.us>

Mon, Oct 23, 2023 at 8:00 AM

Jennifer Becker is also out all day.

[Quoted text hidden]

Annabel Torres <altorres@madison.k12.wi.us>
To: Laura Pedersen <lpedersen@law-rl.com>

Thu, Oct 10, 2024 at 3:27 PM

----- Forwarded message -----

From: **Annabel Torres** <altorres@madison.k12.wi.us>

Date: Mon, Oct 23, 2023, 8:00 AM

Subject: Re: Staff absences and coverage

To: Southside Staff <southside_staff@madison.k12.wi.us>

[Quoted text hidden]

MADISON METROPOLITAN
SCHOOL DISTRICT



Annabel Torres <altorres@madison.k12.wi.us>

Help with volunteer form

1 message

Annabel Torres <altorres@madison.k12.wi.us>

Mon, May 20, 2024 at 12:33 PM

To: Annette N Williams <anjustice@madison.k12.wi.us>, [REDACTED]

Cc: Candace V Terrell <cvterrell@madison.k12.wi.us>

Hi Annette, can you help [REDACTED] with the volunteer application? She has submitted it but it is stuck in an inactive status. She is interested in volunteering this year as soon as possible.

Annabel



Annabel Torres <altorres@madison.k12.wi.us>

Changing space/bathroom guidelines/management

19 messages

Kimberly J Reain <kjreain@madison.k12.wi.us>

Thu, Oct 5, 2023 at 4:01 PM

To: Odell Lewis Jr <olewis@madison.k12.wi.us>, Tracy W Cunnigan <twcunnigan@madison.k12.wi.us>, Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Megan L Donohue <mldonohue@madison.k12.wi.us>, Chelsey L Tubbs <cltubbs@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>

Hi Odell, Tracy, Darlinne, Candace, Annabel, Chelsey, Nurses, and Megan,

These guidelines were posted in the changing room.

Hygiene Procedures

- [Standard Precautions](#)
- [Hand Hygiene](#)
- [Cleaning Standards for School Health Offices](#)
- [Cleaning Body Fluid Spills](#)
- [Diaper Procedure](#)

Chelsey stopped by and asked me about what we need for this room to work for changing students. She is aware that we are working on a hi/low table and we will need things adjusted in that bathroom for it to work once we get it.

Gloves and bags are in the 3 drawers in that bathroom. Please let us know when you need more gloves.

Odell and Tracy thank you for putting these cleaners in that bathroom.

1. Hydrogen Peroxide Cleaner such as Peroxide Cleaner 34A (spray bottle dispenser)
2. 3M Disinfectant Cleaner 42A or 23A (hand trigger spray bottle dispenser)

Who can approve a shelf to be installed in that bathroom that is high enough so we can reach cleaning supplies without students reaching cleaning supplies?

Odell/Tracy, can you add a roll of black trash bags to the trash can in that bathroom so we can tie up smelly diapers and reline the trash can as needed?

Darlinne: Do we need to have a meeting/education around this with staff who provide this support? Do you have any questions?

Darlinne: Can we purchase "chux"/"chucks" pads for this room? Morgan put our paper squares that we have in the health office, to use for a changing pad. But they are small

and do not absorb much. I wasn't sure if there were any special ed funds that could be used for this.

The bathroom door locks. We now have a screwdriver in the Main Office to open the room when this happens. We have one student who loves to lock the door and hold the lock closed.

The **changing room** should have the following:

CLEANING BODY FLUID SPILLS

Supplies Needed:

1. Disposable vinyl gloves
 2. Hydrogen Peroxide Cleaner such as Peroxide Cleaner 34A (spray bottle dispenser)
 3. 3M Disinfectant Cleaner 42A or 23A (hand trigger spray bottle dispenser)
 4. Paper towels
 5. Trash can lined with trash bag
-
1. Clean affected blood or body fluid area first with hydrogen peroxide cleaning products such as Peroxide Cleaner 34A. Spray with Peroxide Cleaner, scrub as needed and wipe dry. Blood or body fluids must be thoroughly cleaned from surfaces and objects before the Disinfectant Cleaner 42A or 23A is sprayed on the affected area.
 1. Spray Disinfectant Cleaner 42A or 23A solution with the hand pump trigger spray dispenser, making sure the entire spill area is covered. Allow the surface to remain wet for 5 minutes. After 5 minutes surfaces can be wiped dry with a cloth/paper towel or allowed to air dry.

The changing room table and items used need to be wiped down after each use following the guideline.

Thank you for keeping the Health Office cleaning supplies filled.

CLEANING STANDARDS FOR SCHOOL HEALTH OFFICES

Peroxide Cleaner 34A

Disinfectant 42A

Peroxide Cleaner 34A should be dated when dispensed and discarded at the 6 month mark per the manufacturer's instructions.

--

Thanks, Kim

Kimberly Reain RN, BSN (She/Her)

Madison Metropolitan School District School Nurse

Contract Hours for both schools are M:720-115 and T/W/TH/F:720-252

kjreain@madison.k12.wi.us

Allis Elementary

Health Office Phone: 608-204-1062

School's FAX: 608-237-0451

Google Voice: 1-513-631-6400 TEXT ONLY

Lapham Elementary

Health Office: 608-204-4147

School's FAX: 608-237-0078



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Candace V Terrell <cvterrell@madison.k12.wi.us>

Thu, Oct 5, 2023 at 4:20 PM

To: Kimberly J Reain <kjreain@madison.k12.wi.us>, Tracy W Cunnigan <twcunnigan@madison.k12.wi.us>, Odell Lewis Jr <olewis@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>

Please use the custodial form to [document](#) request for items. This is how they track needs.

Candace Terrell

Southside Elementary-Principal

608-204-1066

cvterrell@madison.k12.wi.us

"The Highest Human Act is to Inspire"-Ermias Asghedom A.K.A Nip

[Quoted text hidden]

Kimberly J Reain <kjreain@madison.k12.wi.us>

Thu, Oct 5, 2023 at 4:25 PM

To: Candace V Terrell <cvterrell@madison.k12.wi.us>

Cc: Tracy W Cunnigan <twcunnigan@madison.k12.wi.us>, Odell Lewis Jr <olewis@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>

That form does work. I asked Terretha to look at it too. I have it saved. Thanks, Kim

[Quoted text hidden]

Candace V Terrell <cvterrell@madison.k12.wi.us>

Thu, Oct 5, 2023 at 4:27 PM

To: Kimberly J Reain <kjreain@madison.k12.wi.us>

Cc: Tracy W Cunnigan <twcunnigan@madison.k12.wi.us>, Odell Lewis Jr <olewis@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>

Are you saying it is not working for you?

Candace Terrell

Southside Elementary-Principal

608-204-1066

cvterrell@madison.k12.wi.us

"The Highest Human Act is to Inspire"-Ermias Asghedom A.K.A Nip

[Quoted text hidden]

Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>

Tue, Oct 10, 2023 at 12:59 PM

To: Kimberly J Reain <kjreain@madison.k12.wi.us>

Cc: Odell Lewis Jr <olewis@madison.k12.wi.us>, Tracy W Cunnigan <twcunnigan@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Megan L Donohue <mldonohue@madison.k12.wi.us>, Chelsey L Tubbs <cltubbs@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>

Unless there's a big change, the bathroom guidance has been widely shared with ample opportunities to ask questions if there's misunderstanding.

I brought the question of purchasing up at the PST meeting and every PST who responded gave a different answer so to be honest, I'm not really sure how to move forward.

On Thu, Oct 5, 2023 at 4:01 PM Kimberly J Reain <kjreain@madison.k12.wi.us> wrote:

[Quoted text hidden]

--
Darlinne Kambwa
New Teacher Mentor
Program Support Teacher
Department of Student Services

"...Attach yourself to a mission, a calling, a purpose ONLY. That's how you keep your power and your peace..." -Erica Williams Simon

Kimberly J Reain <kjreain@madison.k12.wi.us>

Tue, Oct 10, 2023 at 1:11 PM

To: Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>

Cc: Tracy W Cunnigan <twcunnigan@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>

THanks for letting me know. Kim

[Quoted text hidden]

Kimberly J Reain <kjreain@madison.k12.wi.us>

Wed, Nov 8, 2023 at 9:26 AM

To: Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>, Dulce M Bacallao <dmbacallao@madison.k12.wi.us>

I went to check supplies in the SEA changing bathroom. And I could not find the "Profect HP Hydrogen Peroxide Disinfectant" bottle that was put in that room. It sat on top of the paper towel dispenser. This is for cleaning the cot after changing the student. Does anyone know where this went? Having a high shelf in this room would provide safety around cleaning supplies.

Kim

On Thu, Oct 5, 2023 at 4:01 PM Kimberly J Reain <kjreain@madison.k12.wi.us> wrote:

[Quoted text hidden]

--
[Quoted text hidden]

Southside Elementary
Health Office Phone: 608-204-1062
School's FAX: 608-204-0364

[Quoted text hidden]

Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>

Wed, Nov 8, 2023 at 10:53 AM

To: Kimberly J Reain <kjreain@madison.k12.wi.us>, Aaliyah R Justice <arjustice@madison.k12.wi.us>

Cc: Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>, Dulce M Bacallao <dm Bacallao@madison.k12.wi.us>

Aaliyah, Southside needs a new order of the cleaning stuff...

Dulce/Candace/Annabel how can we make it so that particular bathroom has to be swiped in? I've seen this in other schools I support.

[Quoted text hidden]

[Quoted text hidden]

Aaliyah R Justice <arjustice@madison.k12.wi.us>

Thu, Nov 9, 2023 at 8:25 AM

To: Darlinne T Kambwa-Bell <dtkambwabel@madison.k12.wi.us>

Cc: Kimberly J Reain <kjreain@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>, Dulce M Bacallao <dm Bacallao@madison.k12.wi.us>

Good Morning,

is this something you'd normally have your building custodian order?

[Quoted text hidden]

—

Aaliyah Justice
Student Services
(608)663-8428

Kimberly J Reain <kjreain@madison.k12.wi.us>

Thu, Nov 9, 2023 at 9:42 AM

To: Aaliyah R Justice <arjustice@madison.k12.wi.us>

Cc: Darlinne T Kambwa-Bell <dtkambwabel@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>, Dulce M Bacallao <dm Bacallao@madison.k12.wi.us>

Hi Aaliyah and all

This is the new peroxide product used by Special Ed and Health Services only. Building services use different products.

The product is "Profect HP" by Spartan Chemical. It is a hydrogen peroxide disinfectant that you spray on surfaces, it sits for 30 seconds and then is wiped off. This decreases the amount of wait time for the building services products.

I will ask my Nancy Koch Meyer about this too. Thanks, Kim

[Quoted text hidden]

Aaliyah R Justice <arjustice@madison.k12.wi.us>

Thu, Nov 9, 2023 at 11:04 AM

To: Kimberly J Reain <kjreain@madison.k12.wi.us>

Cc: Darlinne T Kambwa-Bell <dtkambwabel@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>, Dulce M Bacallao <dm Bacallao@madison.k12.wi.us>

Thank you for the clarification.

[Quoted text hidden]

Kimberly J Reain <kjreain@madison.k12.wi.us>

Thu, Nov 9, 2023 at 12:09 PM

To: Aaliyah R Justice <arjustice@madison.k12.wi.us>

Cc: Darlinne T Kambwa-Bell <dtkambwabel@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Candace V Terrell <cvterrell@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>, Dulce M Bacallao <dm Bacallao@madison.k12.wi.us>

I have been told this bottle needs to be located. And that the product is extremely expensive. Darlinne, do you have any ideas?

We need a Salto Lock on this bathroom door. Just like every classroom has. Just like several school's already have their bathrooms being used for changing students.

I have concerns about the safety of students with these chemicals. And now I'm also concerned about the expense.

Candace and Annabel -- are you able to help us with this?

Thanks, Kim

[Quoted text hidden]

Candace V Terrell <cvterrell@madison.k12.wi.us>

Thu, Nov 9, 2023 at 1:53 PM

To: Kimberly J Reain <kjreain@madison.k12.wi.us>

Cc: Aaliyah R Justice <arjustice@madison.k12.wi.us>, Darlinne T Kambwa-Bell <dtkambwabell@madison.k12.wi.us>, Morgan Lange <mlange@madison.k12.wi.us>, Carol A McCarthy <camccarthy@madison.k12.wi.us>, Annabel Torres <altorres@madison.k12.wi.us>, Jill S Bean <jsbean@madison.k12.wi.us>, Dulce M Bacallao <dmbacallao@madison.k12.wi.us>

I am unsure because it is a bathroom and technically an all gender which we are supposed to legally have one available for each floor. Dulce will look into this option but no guarantee. We should continue problem solving. Perhaps a locked cabinet should be purchased.

Candace Terrell

Southside Elementary-Principal

608-204-1066

cvterrell@madison.k12.wi.us

"The Highest Human Act is to Inspire"-Ermias Asghedom A.K.A Nip

[Quoted text hidden]

Kimberly J Reain <kjreain@madison.k12.wi.us>

Mon, Feb 26, 2024 at 1:11 PM

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This is a check in regarding the all gender bathroom the SEAs use for changing in the Green hall. I know we cannot get a Salto lock and this bathroom must be shared by all students.

Cabinet -- at one point there was talk about a cabinet that locks so we have a place to keep our cleaning products, diapers etc.

The peroxide cleaner is provided by Special Ed and Darlinne would manage those refills.

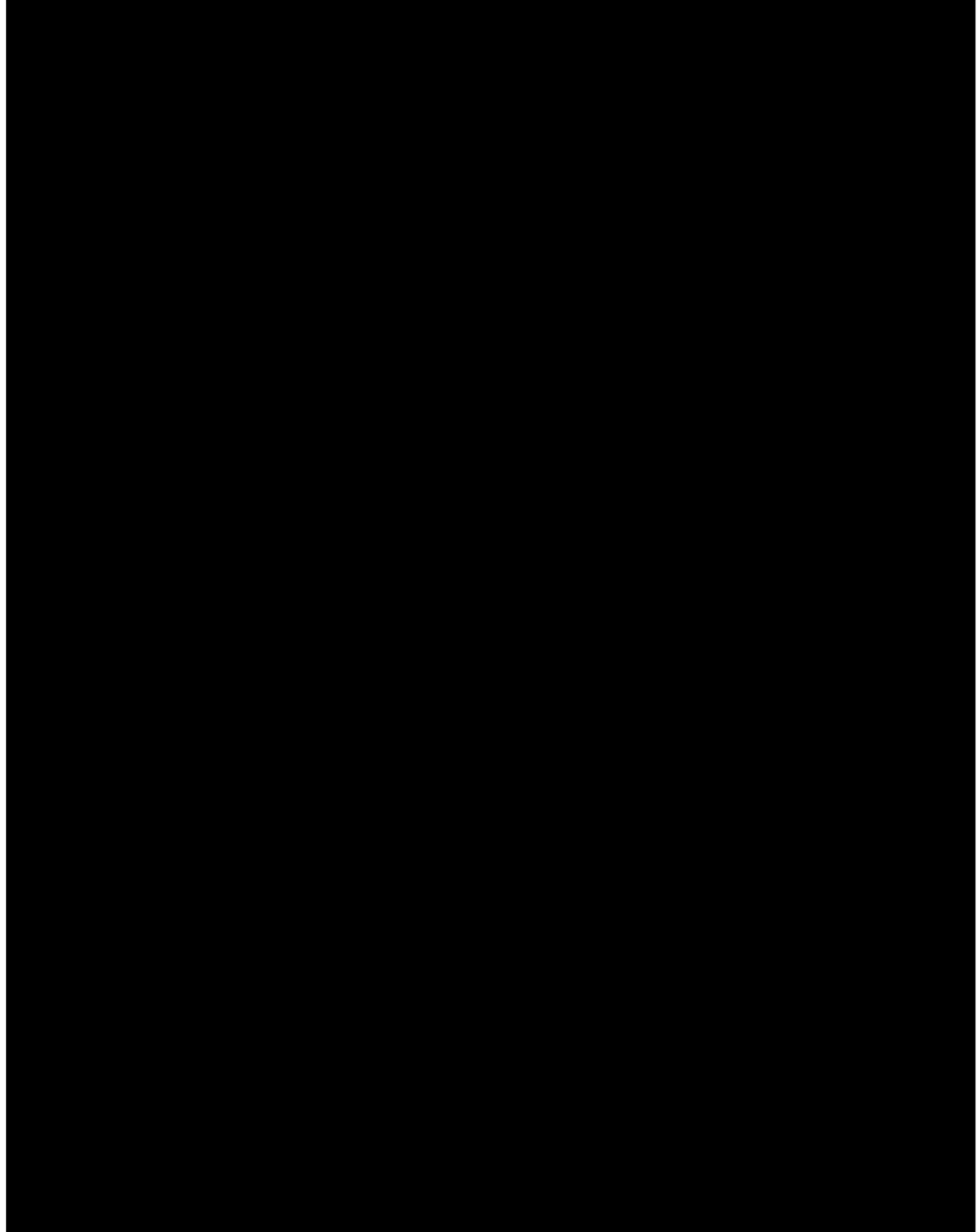
I have placed a disinfectant wipe pail in the room with more gloves. I cannot find the peroxide cleaner.

I'm not sure where things are with the changing table.

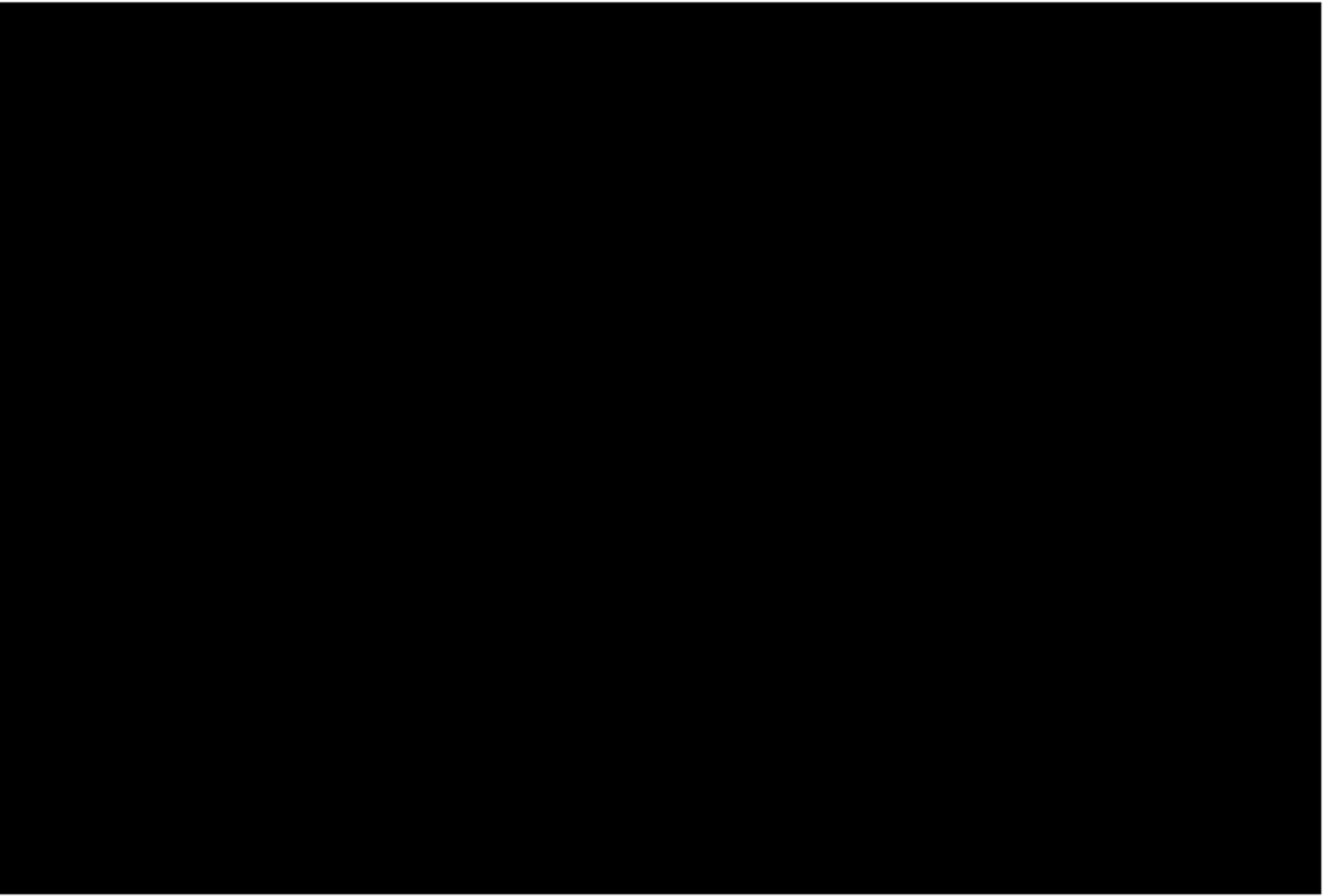
Thanks, Kim

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SECTION 504/ADA COORDINATOR

Background

Under Section 504 of the Rehabilitation Act of 1973, each school district that receives federal financial assistance must designate at least one employee to coordinate the district's compliance with its responsibilities under Section 504. If a district has 50 or more employees, it must also designate at least one employee to coordinate the district's compliance with Title II of the Americans with Disabilities Act (ADA). Most school districts designate one employee to serve both of these roles. This employee is often known as the Section 504/ADA Coordinator.

Similarly, under Washington state law, all school districts must designate at least one employee to monitor and coordinate the district's compliance with state nondiscrimination laws (chapters 28A.640 and 28A.642 RCW, and chapter 392-190 WAC). This employee is often known as the Civil Rights Compliance Coordinator.

The district's Section 504/ADA Coordinator may also serve as the district's Civil Rights Compliance Coordinator. However, if a district assigns different coordinators for these roles, they should regularly collaborate with one-another, particularly on issues related to disability discrimination.

While school districts may determine additional job requirements, the Section 504/ADA Coordinator is, at a minimum, responsible for:

1. Coordinating and monitoring the district's compliance with Section 504 and Title II of the ADA, as well as state civil rights requirements regarding discrimination and harassment based on disability;
2. Overseeing prevention efforts to avoid Section 504 and ADA violations from occurring;
3. Implementing the district's discrimination complaint procedures with respect to allegations of Section 504/ADA violations, discrimination based on disability, and disability harassment; and
4. Investigating complaints alleging violations of Section 504/ADA, discrimination based on disability, and disability harassment.

The district should document that it has communicated these responsibilities to the Section 504 Coordinator. One way of accomplishing this is to have the Section 504 Coordinator sign and date their job description.

Choosing a Section 504/ADA Coordinator

The Section 504/ADA Coordinator should be sufficiently knowledgeable about the requirements under state and federal disability discrimination laws, regulations, and guidance (including Section 504, Title II of the ADA, and chapters 28A.642 RCW and 392-190 WAC) to advise the district about its policies, procedures, and practices and to investigate complaints alleging violations of Section 504/ADA, discrimination based on disability, and disability harassment.

The school district should ensure that the Section 504/ADA Coordinator receives appropriate and ongoing training. The district should clearly communicate the responsibilities and expectations of the position with the Section 504/ADA Coordinator, and should provide them with the time and resources needed to effectively perform these duties.

Sample Section 504/ADA Coordinator Job Description

Note: If the Section 504/ADA Coordinator also serves as the district's Civil Rights Compliance Coordinator and/or Title IX Officer, please see the sample job descriptions for these roles for additional responsibilities.

Name: _____

Title: _____ School District: _____

Signature: _____ Date: _____

In coordination with Civil Rights Compliance Coordinator, the Section 504/ADA Coordinator is responsible for monitoring and implementing the district's compliance with state and federal laws prohibiting disability discrimination, including Section 504, Title II of the ADA, and chapters 28A.642 RCW and 392-190 WAC. The major responsibilities are (1) to prevent discrimination against students, employees, and others of the basis of disability; and (2) to ensure compliance with all procedures and procedural safeguards required under Section 504/ADA. Particularly when indicated below, the Section 504/ADA Coordinator should coordinate closely with the district's Civil Rights Compliance Coordinator.

The Section 504/ADA Coordinator's duties include the following:

Knowledge of Section 504/ADA Requirements

- Develop a working knowledge of current laws, regulations, and guidelines related to disability discrimination in public schools, including Section 504, Title II of the ADA, and chapters 28A.642 RCW and 392-190 WAC, as well as rules and guidelines adopted by OSPI and the U.S. Department of Education's Office for Civil Rights (OCR)
- Become familiar with resources and information available from OCR and OSPI's Equity and Civil Rights Office, and request technical assistance when needed
- Attend trainings on Section 504/ADA, such as those offered by OSPI's Equity and Civil Rights Office and the Northwest ADA Center, and share information with district administrators and staff

OSPI Reporting

- Serve as the district's liaison to OSPI's Equity and Civil Rights Office and OCR for issues regarding Section 504/ADA, and disability discrimination generally
- Update Section 504/ADA Coordinator contact information with OSPI's Equity and Civil Rights Office, as needed

District Policies and Procedures

- Facilitate the implementation of the district's policies and procedures related to Section 504/ADA, and ensure that they are applied consistently across the district and at each school building
- Coordinate revisions to district policies and procedures related to Section 504/ADA, as necessary, to ensure that they are up-to-date and consistent with current requirements under these laws

Nondiscrimination Notices

In coordination with the district's Civil Rights Compliance Coordinator:

- Regularly review district and building publications to ensure that they include a consistent nondiscrimination statement with all of the necessary protected classes and the name (or title),

phone number, and address of the district's Section 504 Coordinator, Title IX Officer, and Civil Rights Compliance Coordinator

- Ensure that the district uses effective methods to annually inform all students, parents, and employees about the district's discrimination complaint procedure, such as in staff and student handbooks
- Ensure that copies of the complaint procedure and any related forms are available in each school building to provide to students, parents, staff, and others who allege discrimination or discriminatory harassment

Section 504 Procedures and Procedural Safeguards

- Develop a systematic process for monitoring both district- and building-level compliance with Section 504 requirements, including but not limited to:
 - Child find responsibilities
 - Parental consent before all initial evaluations and initial placements
 - Written notice to parents, including notice of procedural safeguards, before any actions are taken regarding identification, evaluation, or placement under Section 504
 - Team-based decision-making regarding evaluation and placement of students under Section 504
 - Dissemination of Section 504 plans to appropriate staff
 - Periodic re-evaluations of all students who are eligible under Section 504, at least every three years
 - Manifestation determination requirements for disciplinary changes in placement under Section 504
- Participate on Section 504 teams as needed
- Coordinate training for building-level Section 504 designees, and ensure that they are informed about their job responsibilities (listed below)
- Collect and maintain all Section 504 data, such as Section 504 plans, evaluation reports and related records, lists of eligible students, discipline records, etc.
- Coordinate due process hearings when requested

Accessibility and Requests for Accommodations

- Continually monitor the reduction of architectural barriers for individuals with disabilities
- Receive and process requests for reasonable accommodations at school and district events
Coordinate with the district's human resources office to facilitate the provision of reasonable accommodations for district employees with disabilities

Training and Consultation

In coordination with the district's Civil Rights Compliance Coordinator:

- Provide ongoing support and training to administrators and district- and building-level staff about requirements under Section 504/ADA, staff responsibilities, complaint procedures, and related district policies and procedures
- Disseminate information and coordinate training for students and/or parents about their rights under Section 504/ADA, and the district's complaint procedures
- Advise the superintendent and school board regarding the status of the district's compliance with Section 504/ADA
- Receive and respond to inquiries from students, parents, staff, administrators, and others regarding Section 504/ADA, disability discrimination, and harassment based on disability

- Serve as a resource for administrators, district- and building-level staff, and Section 504 teams about Section 504/ADA and disability discrimination

Complaints and Investigation

In coordination with the district's Civil Rights Compliance Coordinator:

- Respond to students, parents, staff, administrators, and others who report suspicion of Section 504/ADA violations, disability discrimination, or harassment based on disability. The coordinator should investigate these concerns, institute corrective actions when appropriate, inform the individual about the district's complaint procedures, and assist individuals in filing complaints when needed
- Implement the district's discrimination complaint procedure with respect to allegations of Section 504/ADA violations, disability discrimination, and harassment based on disability; receive and process complaints; and oversee the step-by-step process to be sure that timelines are met
- Conduct and/or coordinate investigations of Section 504/ADA complaints in accordance with the district's discrimination complaint procedures. This may involve interviewing complainants, respondents, and witnesses; reviewing documents and other relevant materials; and researching legal standards and requirements relevant to the complaint. If the Section 504/ADA Coordinator has identified a conflict of interest with respect to a particular complaint, the coordinator should recommend that the district hire a neutral outside investigator to investigate a particular complaint
- Upon completion of the investigation, provide the superintendent with a written report of the complaint and the results of the investigation in time for the superintendent to respond to the complainant within 30 days after the district initially received the complaint
- Organize and maintain records of all Section 504/ADA and disability discrimination complaints filed, including all formal and informal complaints. At least annually, review complaint files to ensure that the district's complaint procedures and timelines are consistently being followed; and to identify any patterns and repeat offenders

Textbooks and Instructional Materials

In coordination with the district's Civil Rights Compliance Coordinator:

- Participate in the development and implementation of the school district's instructional materials policy and bias review criteria with respect to bias pertaining to disability in all textbooks and instructional materials
- Ensure that the district evaluates all textbooks and instructional materials for bias, update bias review criteria when needed, and participate on the instructional materials committee when appropriate

Reviewing Systemic Barriers

In coordination with the district's Civil Rights Compliance Coordinator:

- Participate in the development and implementation of the school district's process to routinely review disaggregated student discipline data and course and program enrollment data to identify and address potential disparities and systemic barriers based on disability
- Continually monitor school programs, activities, and services (including, but not limited to, Advanced Placement courses, Highly Capable Programs, Career and Technical Education courses, Alternative Learning Experiences, extra-curricular activities, etc.) to ensure that all students are given an equal opportunity to participate without discrimination based on disability

- Coordinate with the district's human resources office to evaluate employment criteria, recruitment, compensation, job classification, benefits, and advertising to ensure that they are not discriminatory on the basis of disability

Sample Section 504 Building Designee Job Description

- Maintain building records and documentation for all students eligible under Section 504 and provide copies to the district Section 504 Coordinator
- Ensure the implementation of Section 504 procedures in the school building, including:
 - Coordinating referrals
 - Determining appropriate Section 504 team composition and participating on Section 504 teams as needed
 - Facilitating Section 504 evaluations and development of Section 504 plans
 - Providing notices and documenting parental consent
 - Distributing Section 504 plans to appropriate staff
 - Monitoring the implementation of Section 504 plans
 - Scheduling annual reviews of each Section 504 plan
 - Scheduling period re-evaluations of all students eligible under Section 504 at least every three years
 - Assuring that Section 504 plans move with the student to the next grade level and to new schools
 - Coordinating training of building staff on Section 504 requirements
 - Conducting manifestation determinations when required for students eligible under Section 504
- Serve as a daily resource to the building administrators, teachers, and staff regarding Section 504
- Serve as a liaison between the school building and other district staff regarding Section 504 issues
- Maintain contact with the district Section 504 Coordinator and request assistance and training when needed
- Attend periodic district Section 504 trainings as needed to stay informed about current district requirements to comply with Section 504