



# **Bullying Prevention in District of Columbia Educational Institutions:**

## **School Year 2013-14 Compliance Report**

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Prepared for the DC Office of Human Rights by

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## Executive Summary

The Robert F. Kennedy Center for Justice and Human Rights' bullying prevention initiative, RFK Project SEATBELT (RFKC) was contracted by the DC Office of Human Rights (OHR), in June 2013, to provide resources and support for DC public and public charter schools' bullying prevention efforts. This contract moved to Child Trends in August 2014. From August 2013 through September 2014, an audit of each local education agency's (LEA) anti-bullying policy was conducted to determine the extent to which it is compliant with the *2012 Youth Bullying Prevention Act* (YBPA; DC Law L19-167).

All LEAs were asked to submit their policies in September 2013, in accordance with the requirements of the YBPA. Submissions were accepted until September 30, 2014. Each submitted policy was reviewed, and a report of compliance was provided to the LEA and to OHR. Policies that were resubmitted were similarly reviewed. This report summarizes the current state of LEA compliance as well as the most-often overlooked or missing required components in initially submitted policies.

Highlights of findings include:

- 57 of 61 (**93.4 percent**) of DC Public Charter LEAs as well as DC Public Schools submitted a bullying prevention policy to the DC Office of Human Rights by September 30, 2014.
- 42 of 61 DC Public Charter LEAs (**70.5 percent**) and DC Public Schools had policies compliant with the Youth Bullying Prevention Act of 2012 by September 30, 2014.
- 17 charter school policies were deemed compliant upon submission, all of which adopted the mayor's Bullying Prevention Task Force's model policy ("model policy"). The remaining 25 compliant policies were revised and resubmitted.
- On initial submission, LEAs were most often non-compliant on:
  - Coverage of electronic bullying off-campus that interferes with students' participation in or benefit from schools' services,
  - Having the verbatim definition of bullying as defined in the YBPA,
  - Stating that consequences are to be applied in a flexible manner based on students' developmental age, the nature of the incident, and disciplinary history, and
  - Providing a consistent appeals process as defined in the YBPA.

This report is limited to assessing whether or not an LEA has submitted a compliant policy. Further work is needed to understand LEAs' implementation of these bullying prevention policies across multiple campuses as well as LEAs' broader bullying prevention efforts. **It is not assumed that LEAs will successfully prevent and intervene in bullying incidents simply by having a bullying prevention policy.** However, having a compliant policy is a first step toward these goals. Further, having a compliant policy allows for greater transparency and clarity for the District's students, parents, and guardians in seeking relief after a bullying incident.

## Overview

The *2012 Youth Bullying Prevention Act* (YBPA; DC Law L19-167) was signed into law on June 22, 2012 by Mayor Vincent C. Gray. The Act requires all youth-serving agencies (including, but not limited to, schools, libraries, non-profits, and community centers) to adopt a bullying prevention policy. Such policies must contain detailed and specific language in seven broad areas: statement of scope, definition, code of conduct and consequences, reporting, investigation, appeals, and retaliation. In the Act, these seven components are comprised of 43 subcomponents that detail specific language that must be present in every DC bullying prevention policy.

The YBPA also commissioned an expert task force, led by the DC Office of Human Rights (OHR) and comprised of representatives from DC's youth-serving agencies and subject matter experts, to develop a model policy to serve as an example for youth serving agencies developing their own policies. The model policy was released by the mayor's Bullying Prevention Task Force in January 2013. The model policy includes all required elements<sup>1</sup> as well as best practices in bullying prevention more generally, including using a public health, multi-tiered framework to guide universal and targeted prevention and intervention.

All youth-serving agencies were required to submit a compliant bullying prevention policy to OHR by September 13, 2013. Given its expertise in the field, The Robert F. Kennedy Center for Justice and Human Rights' bullying prevention initiative, RFK Project SEATBELT (RFKC) was contracted by OHR in June 2013 to review policies submitted by DC local education agencies (LEAs),<sup>2</sup> including public charter schools and DC public schools (DCPS), to determine compliance with the YBPA. To complete the project, this contract moved with the first author to Child Trends in August 2014. RFKC worked with the Safe School Certification Program (SSCP), which had previous experience reviewing bullying prevention policy compliance in the state of Iowa, to develop a checklist of required elements of the YBPA. Policy submissions were accepted through September 30, 2014. Identified components and subcomponents are detailed in table 3.

Prior to policy submission, RFKC and OHR worked together to notify LEAs about the requirements of the YBPA. Such efforts included three official requests via email, follow-up phone calls and emails, participation in webinars held by the DC Public Charter School Board (PCSB), information in the PCSB Tuesday morning bulletin, and in-person meetings with LEA leaders. Representatives from RFKC and OHR also presented information regarding the YBPA's requirements and RFKC's services to the Public Charter Schools Board in January 2014. RFKC provided assistance to LEAs prior to and throughout the submission process, including by providing links to website guidance on the required components and the model policy.

**Audits were conducted exclusively at the LEA level. Individual campuses within DCPS or within multi-campus public charter schools were not assessed as to their adoption of the LEA policy.** Further, only

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<sup>1</sup> One subcomponent ("possible consequences for retaliation") was not specifically detailed in the model policy, and as such was not considered in the review of policies for this report.

<sup>2</sup> Local education agencies include both public school districts as well as charter school operators. Charter operators may have a single campus or multiple campuses in DC.

submitted policies were reviewed. Use, publication, and effectiveness of policies are not covered by the current review (see Recommendations and Next Steps). Having a compliant bullying prevention policy is an important first step in creating consistent understanding and procedures around bullying. However, a policy in and of itself does not and cannot prevent bullying.

The purpose of this report is to provide a summary of findings from the 2013-2014 audit and provide recommendations to bring the remaining LEAs into compliance.

## **Significant Results**

As of September 30, 2014, 57 charter schools and DCPS submitted policies for review. This represents 93.4 percent of the DC public charter school LEAs operating in the 2013/2014 school year that will continue operating in the 2014/15 school year.<sup>3</sup> Of those submitting policies, 15 charter school policies were found to be fully compliant upon initial submission. An additional 25 policies were found to be compliant following resubmission and re-review, for a total of 40 compliant policies by September 30, 2014. This represents 75.4 percent of submitted policies and 70.5 percent of all charter school policies. Upon revision, DCPS's policy was also found to be compliant. Specific listings of schools and their compliance and revision status are reported in table 1.

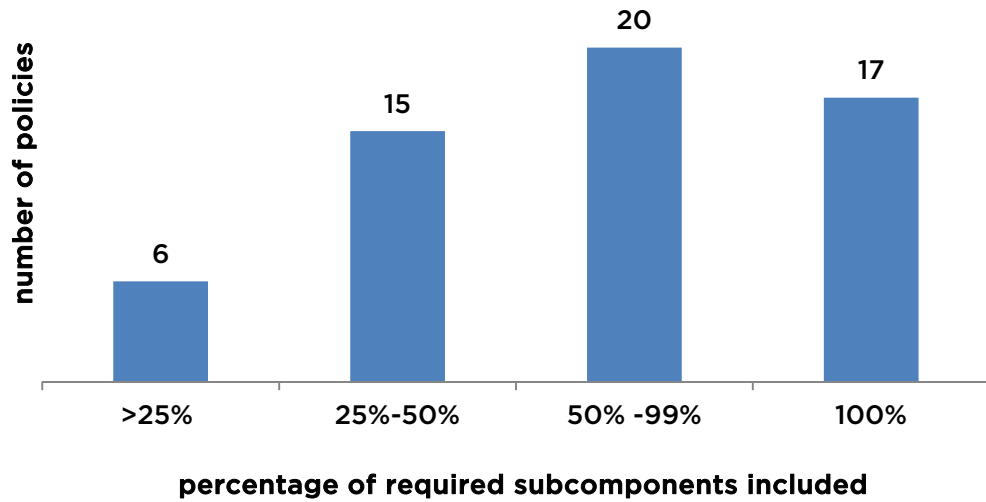
### **Subcomponent inclusion**

Components, and their related subcomponents, are detailed in table 3. On initial submission, policies could be rated between zero to 100 percent compliant, based on the 43 required subcomponents. Six policies met less than 25 percent of requirements, 17 policies met between 10 percent and 50 percent of requirements, 20 policies met between 50 percent and 99 percent of requirements, and 15 policies met 100 percent of requirements. Results reported in tables 2 and 3 are based on the initial submissions of policies and do not reflect revised policies. Table 4 reports the current status of all policies.

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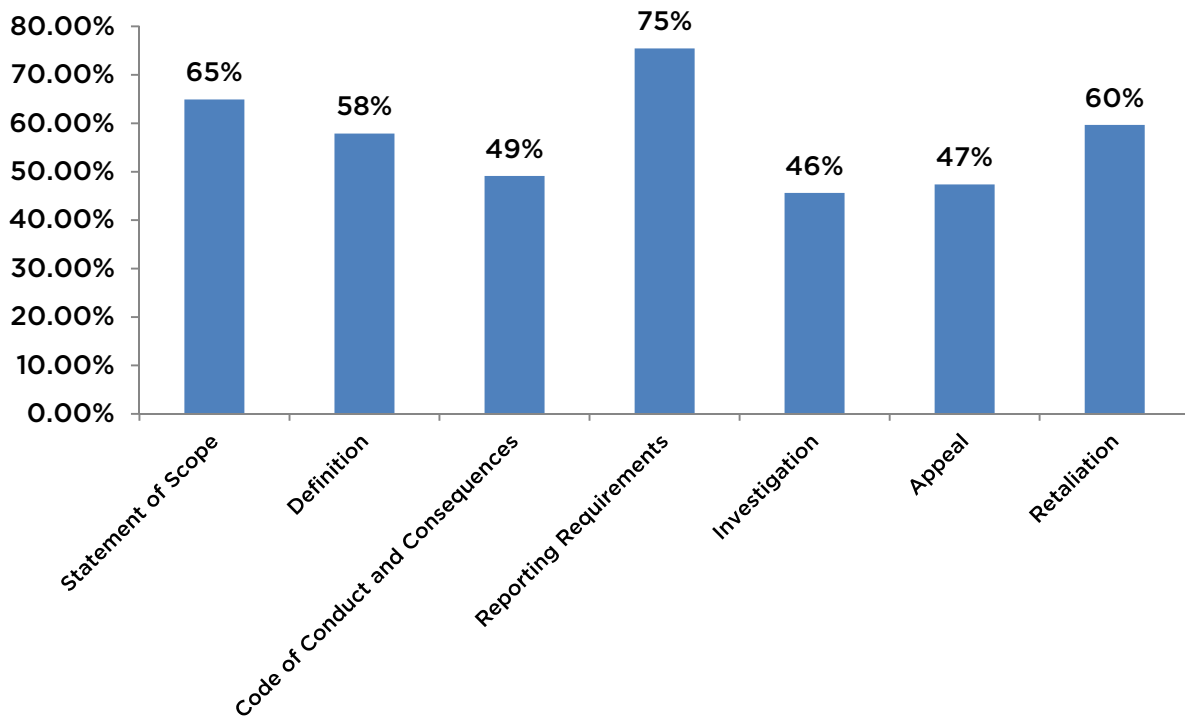
<sup>3</sup> Three charter schools closed between the 2013/2014 school year and the 2014/2015 school year – Arts Technology Academy, Booker T. Washington, and Imagine Southeast. These schools were not included in this report.

## Status of policies on initial submission



Overall, each of the seven overarching components was met by an average of 56.1 percent of submitting LEAs. Two components, statement of scope and reporting requirements, were met by over 60 percent of submitting LEAs. Investigations, code of conduct, and appeals had the lowest rates of compliance, with only 45.6 percent, 47.4 percent, and 47.4 percent of LEAs including all required subcomponents on initial submission, respectively.

## Percentage of legal requirements included

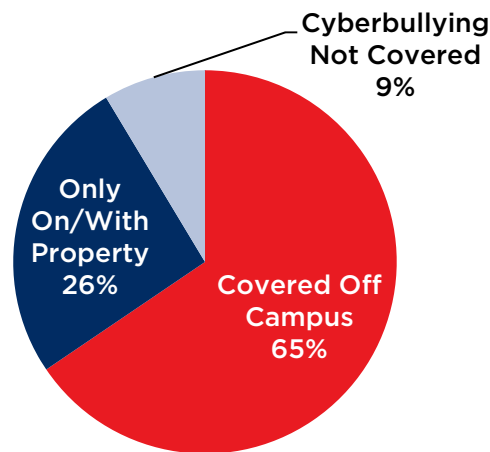


The following subcomponents were found to be missing most often (< or = 65 percent), in non-compliant policies:

- **Statement of coverage of electronic bullying that causes a significant interference with a youth’s ability to participate in or benefit from the school’s services, activities, or privileges**

Although most policies included provisions for electronic bullying on campus (89.7 percent) and with school technology (77.6 percent), a smaller percentage included required language about off-campus electronic bullying (65.5 percent). Some LEAs may be resistant to this responsibility, but it is important to stress the requirement for its inclusion.

### Cyberbullying coverage on initial submission



- **Definition of bullying as defined in the YBPA, including all enumerated categories**

Of those that were not compliant on this component, many policies made an attempt at this definition but either left out, misspelled (e.g., interfamily violence vs. intrafamily violence), or otherwise changed some of the enumerated categories. Two schools cited a pending, but not yet enacted, federal bill (the Student Non-Discrimination Act) instead of including sexual orientation and gender identity in their definition. Bringing this category to compliance will require little work for schools, since the requirement in YBPA is for all policies to use the exact definition contained in the Act.

- Flexibility requirements surrounding use of consequences (e.g., developmental age, previous history)

Inclusion of these requirements varied, but generally, schools missing one, missed all flexibility requirements. It is also important to note that although consequences are defined as flexible, the vast majority included in-school and out-of-school suspensions or expulsions as consequences.<sup>4</sup> In accordance with the language in YBPA, LEAs are still considered compliant even if they use these zero-tolerance-type procedures, as long as language regarding flexibility is included.

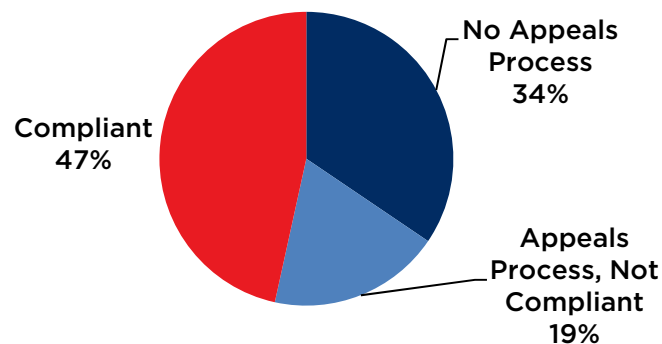
- Name and contact information of responsible individual at school

Interestingly, some schools provided the contact information for the responsible individual, but not the name, or vice-versa. This may reflect a concern regarding turnover in a specific position and reluctance to define the person in the policy. YBPA, however, specifically requires a name, so these policies were still found non-compliant for reporting requirements.

- Appeals procedure requirements as defined

Most schools failed to include any information about appeals, or simply provided a statement that students could appeal without a definition of the procedure. Many schools failed to make clear that any party dissatisfied with the outcome could appeal, as opposed to only those accused.

### Appeals process inclusion on initial submission



<sup>4</sup> This is also consistent with the model policy, which suggests the following for potential consequences of bullying: reprimand; deprivation of privileges; bans on participating in optional activities; deprivation of services; and banning or suspension from facilities.



- **Definition of who retaliation applies to (62.1 percent to 75.9 percent)**

YBPA provides that students may not retaliate against those who have reported the bullying, the victims, or any witnesses. Many schools specify that retaliation applies to those who report bullying (70.5 percent), but fewer (60.7 percent) specifically include the victim. Often, those who are bullied do not report bullying; instead, a witness may report the bullying for them. Still, the victim is at risk of retaliation regardless of who reported the bullying.<sup>5</sup>

## **Other findings**

A number of other notable patterns emerged outside of specific component compliance. These patterns are important to note, as they may be helpful in developing technical assistance, best practices, and policies.

- **Use of model policy and YBPA**

Each of the 17 initially-compliant public charter school policies was clearly derived from the provided model policy, and included most of the optional provisions alongside the required provisions from the YBPA. Although this is laudable, whether schools submitting all optional components of the model policy (e.g., tiered public-health model) will actually implement their stated policy with fidelity is a question that must be considered. This question cannot be answered by the current analysis.

Several policies (6) submitted were likely developed under DC's previous bullying prevention law, or did not consider the YBPA at all in their creation. These policies included less than 25 percent of required components under the YBPA. Although these schools submitted policies as required, it is questionable whether they should be counted.

- **Parental notification**

Although parental notification is not included as a provision in YBPA, several schools included such a provision in their policy. Some included the language available in the model policy (e.g., "with student assent"), but many others structured such policy to require mandatory parental notification without language regarding discretion or considerations for potentially negative impacts of parental notification.<sup>6</sup> For example, youth who are LGBT may not be out to hostile parents, and revealing a bullying situation may also disclose the student's real or perceived sexual orientation, creating the potential for parental rejection or other negative outcomes. However, since language pertaining to parental notification is not currently included in the YBPA, only in the model policy, inclusion of such language does not constitute a non-compliance with the law.

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<sup>5</sup> Mishna, F. & Alaggia, R. (2005). Weighing the risks: A child's decision to disclose peer victimization. *Children & Schools*, 27(4)217-226.

<sup>6</sup> Stafanil Jr, M.(2012). Identity, Interrupted: The parental notification requirement of the Massachusetts Anti-Bullying Law. *Tul. JL & Sexuality*, 21, 125.

- **Anonymous reporting**

Some schools (3) included specific provisions preventing anonymous reporting, counter to the requirements of the YBPA. Anonymous reporting must be specifically allowed within anti-bullying policies, with a clause that formal action cannot be taken solely on the basis of an anonymous report.

- **Zero tolerance**

As noted earlier, the vast majority of schools including consequences for bullying did so in a “zero-tolerance” manner, mandating either suspension or expulsion for acts of bullying. Although the intent of YBPA was to allow flexibility in consequences, and one could argue that suspension and expulsion are not appropriate consequences for certain types of incidents, the language currently contained in the YBPA does not preclude schools from using such discipline.

- **Retaliation consequences**

In the initial compiling of requirements for the YBPA, RFKC and SSCP identified consequences for retaliation as a required component. Upon review, the model policy did not specifically contain this provision. As such, it was not included as requirement for compliance in this analysis. It is recommended that given the language contained in the YBPA, the model policy should be revised to include this provision and it should be once again required for school policies. Such revision is typically as simple as adding retaliation explicitly to the consequences section.

## **Eight Key Elements Survey**

Outside of LEA requirements pursuant to the YBPA, a number of best practices in bullying prevention are indicators of likelihood of more-effective implementation. To this end, RFKC disseminated a survey to charter schools asking about their efforts on eight of the most critical elements as identified by recent research.<sup>7</sup> Eighteen LEAs that submitted policies started the survey, and eight completed the survey. Although based on a limited sample of schools, the findings on this survey help demonstrate schools’ current efforts around bullying prevention, and the need for additional support for schools to help them identify and implement effective strategies.

Initial results indicate that schools are using a variety of methods to carry out each element, but all are in need of improvement. Initial findings are reported below:

### **1. Data**

Ongoing collection of valid and reliable data is critical for the leadership team to be able to assess the conditions for learning at school and make decisions about the best use of resources

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<sup>7</sup> Espelage, D., Astor, R. et al. (2013) *Prevention of Bullying in Schools, Colleges, and Universities*. American Education Research Association. Available: <http://www.aera.net/Portals/38/docs/News%20Release/Prevention%20of%20Bullying%20in%20Schools,%20Colleges%20and%20Universities.pdf>

to address emerging issues.<sup>8</sup> Teachers often underestimate, for instance, the amount of bullying that occurs at school.<sup>9</sup> Having systematic data collection allows schools to identify issues that may not be readily visible and to assess the impact of their efforts.<sup>10</sup>

Each of the eight schools reported using incident data. Two schools reported using survey data from students, including multiple measures of bullying harassment, and reported these measures as valid and reliable. Only one school reported using survey data from staff. Three schools also used measures of students' sense of safety in school and students' engagement in school. In free response, schools reported primarily using referral sheets and class surveys.

## 2. Buy-in

In order for a school to be successful in its bullying prevention efforts, it must gain the buy-in of the majority of the school community for the process. This means that the community is regularly informed of the efforts, they have opportunities to contribute in meaningful ways, and they can see the results of their efforts.<sup>11</sup>

Six schools provided responses to this item. Two responding schools reported being unsure about how they were building buy-in. The other four reported using professional development aimed at building efficacy on bullying prevention and improving school climate.

## 3. Leadership team

School climate and bullying prevention efforts need to be supported and actively engaged in by school administration (principal, vice principal, etc.) in order to be effective.<sup>12</sup> At the same time, all members of the school's community need to feel like they have a role and a voice in making decisions that affect school climate.<sup>13</sup> Schools that engage school staff, parents, and students on leadership teams are higher performing than those that have a more hierarchical model.<sup>14</sup>

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<sup>8</sup> Ibid 6

<sup>9</sup> Bradshaw, C. P. & Wassdorp, T. E. (2009). Measuring and changing a "culture of bullying." *School Psychology Review*, 38(3), 356-361.

<sup>10</sup> Horne, A.M. & Orpinas, P. (2010). Creating a Positive School Climate and Developing Social Competence. In: S.R. Jimerson, S.M. Swearer & D.L. Espelage (Eds.), *Handbook of Bullying in Schools: An International Perspective*. New York, NY: Routledge, pp 49-51; Nickerson, A.B., Cornell, D.G., Smith, D.H., Furlong, M.J. (2013). School antibullying efforts: advice for education policymakers. *Journal of School Violence*, 12(3), 253-264.

<sup>11</sup> Ibid 9

<sup>12</sup> Horne, A.M. & Orpinas, P. (2010). Creating a Positive School Climate and Developing Social Competence. In: S.R. Jimerson, S.M. Swearer & D.L. Espelage (Eds.), *Handbook of Bullying in Schools: An International Perspective*. New York, NY: Routledge, pp 49-51; Nickerson, A.B., Cornell, D.G., Smith, D.H., Furlong, M.J. (2013). School antibullying efforts: advice for education policymakers. *Journal of School Violence*, 12(3), 253-264.

<sup>13</sup> Edstrom L.V., Frey S.K., Hirhstein M.K. (2010). School Bullying: A Crisis or an Opportunity?. In: S.R. Jimerson, S.M. Swearer & D.L. Espelage (Eds.), *Handbook of Bullying in Schools: An International Perspective*. New York, NY: Routledge, pp 403-406.

<sup>14</sup> Learning from Leadership Project. (2010). *Investigating the Links to Improved Student Learning: Final Research Report to the Wallace Foundation*.

Six schools provided responses to this item. Of those providing responses, three reported having a leadership team to work on bullying prevention issues. Only one school reported involving students on this team.

#### 4. Student engagement

Students must be actively engaged in changing the school climate and preventing bullying.<sup>15</sup> When students are engaged, they are much more likely to improve their behaviors and reconnect to school.<sup>16</sup>

Six schools provided responses to this item. Two of the six schools reported no student engagement efforts. The others reported using school assemblies (e.g., “community day”), using a curriculum in PE/health classes, or working with students as issues arise.

#### 5. Policy enforcement

Bullying prevention policies need to be enforced consistently and fairly, and investigations must be expedient and thorough.<sup>17</sup>

Six schools provided responses to this item. Responses included that a school was already consistent in enforcement, that students were segregated by grade for recess, and that the school held parental meetings. None of these truly reflects efforts to ensure policy enforcement. One school mentioned using data to detect bullying patterns and using strategically-placed personnel.

#### 6. Family and community engagement

Although school is the primary setting for youth interaction with peers, messages received at school must be reinforced by families and communities in order to be effective.<sup>18</sup> Active family support and engagement also helps promote student engagement in school climate efforts.<sup>19</sup>

Only one of the eight schools indicated having a strategic effort to engage families and communities in bullying prevention efforts. This school indicated they have a full-time parents’ center with bilingual staff.

#### 7. Programs

Two schools reported having no bullying or related programming. Three reported using character education, one reported using social-emotional learning, and one reported using Positive Behavior Interventions & Supports and HealthSmart curriculum. One reported that

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<sup>15</sup> Ibid 6

<sup>16</sup> Christenson S.L., Havsby L.H. (2004). Family-school-peer relationships: significance for social, emotional, and academic learning. In: J.E. Zins, R.P. Weissberg, M.C. Wang, and H.J. Walberg (Eds.), *Building Academic Success on Social and Emotional Learning: What Does the Research Say?*. New York, NY: Routledge, pp 59-64.

<sup>17</sup> Ibid 6

<sup>18</sup> Frey K.S., Holt M.K., Hymel S., Limber S.P., Raczynski K. (2013). School and community-based approaches for preventing bullying. *Journal of School Violence*, 12(3), 236-248.

<sup>19</sup> Ibid 15

students would receive information in their advisory period, but provided no further detail. Schools did not provide information about evidence of program effectiveness.

## 8. Training

Although the vast majority of school staff want to do something to respond to bullying and other school climate issues, most report having little-to-no training on how to do so.<sup>20</sup> Providing training for all school staff (from cafeteria workers to teachers and principals) on areas of key need identified by the school is critical in furthering school climate efforts.<sup>21</sup>

80 percent of schools reported training staff on bullying prevention and policy. Beyond narrative confirmations of providing training, schools did not provide further detail.

## Recommendations and Next Steps

Thirty percent of DC charter schools do not have a compliant bullying prevention policy. Having a compliant policy is the first step in implementing effective bullying prevention. Efforts must be made to ensure compliance of all LEA bullying prevention policies.

Further, audits should be conducted not only at the LEA level, but at each school, to ensure compliance. The current audit, for instance, can only say that DCPS as a whole has a compliant policy; it cannot be determined with current data whether any individual school has adopted and implemented DCPS's overarching policy. Efforts to ensure the adequate and compliant publication of the policies by each school should also be considered.

A bullying prevention policy alone cannot prevent bullying, and most likely will not achieve reductions in DC's bullying rates.<sup>22</sup> Efforts must be made to understand the state of bullying and bullying prevention in DC schools.

Suggestions to accomplish each of these recommendations are detailed below.

### 1. LEA and school policy compliance

Currently, DCPS and 70.5 percent of DC public charter schools have a compliant bullying prevention policy. In order to boost compliance, the Citywide Bullying Prevention Initiative should take the following efforts to address the needs of three groups of schools: (1) those that have submitted and

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<sup>20</sup> Gulemetova, M., Durry, D., & Bradshaw, C. (2011). Findings from the National Education Association's nationwide study of bullying: Teachers' and education support professionals' perspectives. *White Papers from the White House Conference on Bullying Prevention*, 11-19.

<sup>21</sup> Ibid 11

<sup>22</sup> The effectiveness of anti-bullying policies has not been well studied, but its acknowledged that policies likely play a critical role in bullying prevention, they cannot operate in isolation (see: Espelage, D., Astor, R. et al. (2013) *Prevention of Bullying in Schools, Colleges, and Universities*. American Education Research Association. Available: <http://www.aera.net/Portals/38/docs/News%20Release/Prevention%20of%20Bullying%20in%20Schools,%20Colleges%20and%20Universities.pdf>)

have minor revisions to complete; (2) those that have submitted but seem unaware of the YBPA; and (3) those that have not submitted at all.

### *1.1 Minor revisions*

This group should be re-sent their compliance memos to bring their policies into consideration. They should also be encouraged to complete the key component survey to receive additional assistance.

### *1.2 YBPA awareness*

This group seems to be aware of their obligation to submit a bullying policy, but unaware of the requirements of the YBPA. In addition to resending their compliance memos and the model policy to them, training should be provided to cover the required components and common pitfalls identified from the initial round of audits. This training could take place in the form of a webinar.

### *1.3 Non-submitters*

In addition to making the training provided to group 2 available to this group, OHR should determine what regulatory measures it may have to compel those schools that have yet to submit their policies.

Additionally, recognizing the limitations of our current efforts to understand school compliance with implementing LEA policies, as well as limitations in ensuring continued compliance of LEA policies, OHR should develop a mechanism by which policy-compliance issues can be reported. It is likely overly burdensome to require a full review of all school-level policies or continuing review of LEA policies, but engaging the public in identifying potentially non-compliant policies will help assure consistency throughout DC. Further, requirements that go beyond the written policy were not assessed. For instance, the YBPA requires youth-serving agencies to make parents and youth aware of the existence of the policy. It may be necessary to remind LEAs that the purpose of having a policy is not simply to comply with the YBPA, but to provide clear guidance to parents and youth for responding to bullying.

## **2. Beyond policy compliance**

The ultimate goal of the YBPA is to help prevent and reduce bullying in the District of Columbia. In order for schools to be successful, they must move beyond the letter of the law – that is, simply having a policy in their handbooks – to the spirit of the law. This means actually implementing policies with fidelity and working to build the environments that prevent bullying before it starts.

As evidenced by the (albeit minimal) response to the key components survey, most schools have not engaged in the critical data-based decision-making that underlies creating positive school climates and preventing behaviors like bullying.<sup>23</sup> Though there is no one-size-fits-all program or solution for bullying, when schools use a strategic and informed framework to identify the processes that both are feasible and fit their needs, they are more likely to implement programs with fidelity and see significant impacts in problem behavior.<sup>24</sup>

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<sup>23</sup> Thapa, A., Cohen, J., Guffe, S. & Higgins-D'Alessandro, A. (2013). A review of school climate research. *Review of Educational Research*, 83(3), 357-385

<sup>24</sup> Greenberg, M. (2010). School-based prevention: current status and future challenges. *Effective Education*, 2(1), 27-52.

Only two of the responding schools indicated they collect survey data from students. It is widely acknowledged that relying solely on incident-based reporting of bullying likely does not capture the full extent of the issue.<sup>25</sup> Further, only measuring the problem behavior, and not known protective and risk factors such as the school climate, limits schools' ability to identify and create needed supports to not only intervene in bullying, but prevent it.<sup>26</sup>

In order to both assess and assist schools in their efforts to move beyond policy compliance and toward achieving the ultimate goal of reducing bullying in DC, the DC Office of Human Rights should consider the following:

### *2.1 Data collection*

The YBPA requires that all educational institutions provide "an annual report regarding the aggregate incidents of bullying, and any other information that the Mayor determines is necessary or appropriate" (Section 8a). Recognizing that incident data is often skewed<sup>27</sup> and provides little information on which schools can base their prevention efforts, OHR should require the additional use and reporting of a valid and reliable survey tool in each school, to be aggregated in the annual report. Measures should include not only student and staff perceptions and experiences with bullying, but also risk and protective factors such as engagement with school, relationships with peers and adults, and general perceptions of safety in the school environment. Requiring this across all LEAs will provide local comparisons for assessing each LEA's progress and need, as well as a broader set of indicators to help identify those schools in need of support and the types of supports those schools may need.

### *2.2 Assessment and recognition of bullying prevention efforts*

Although the YBPA strongly acknowledges the need for bullying prevention, these components are not currently mandatory. Instead, OHR should consider mechanisms by which to incentivize the use of bullying prevention efforts. This can be achieved, for instance, by assessing LEAs' and individual schools' efforts in bullying prevention and improving school climate, providing technical assistance to support such efforts, and awarding and recognizing schools making exceptional progress so they can serve as role models across DC and the country.

## **3. Additional recommendations**

Throughout the review of existing DC bullying prevention policies, several issues were identified that need clarification or further guidance. These include:

### *3.1 Clarifying obligation for addressing off-campus electronic bullying and coordination with other agencies*

Currently, the YBPA provides that all agencies must address cyberbullying that significantly affects a youth's ability to participate in or benefit from the agency's services. If the youth involved are engaged

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<sup>25</sup> See, for instance, Catalanello, R. (2011, May 8). School bullying widely underreported. *Tampa Bay Times*. Available: <http://www.tampabay.com/news/education/k12/school-bullying-widely-underreported/1168558>

<sup>26</sup> See Espelage et al., 2013 Ibid 3; Orpinas, P. & Horne, A. M. (2010). Creating a positive school climate and developing social competence. In: S.R. Jimerson, S.M. Swearer, & D.L. Espelage (Eds.) *Handbook of Bullying in Schools: An International Perspective*, New York: Taylor and Francis, 49-59.

<sup>27</sup> Ibid 24.

with multiple agencies, all of which are required to investigate and respond to the bullying, there might arise a situation in which different determinations are made and/or the offending youth receives overly burdensome consequences. OHR should work to clarify how agencies should work together in such situations.

### *3.2 Providing additional regulation and clarity on consequences and the use of suspension and expulsion*

The YBPA has strong language requiring flexibility in the use of consequences rather than the reliance on zero tolerance, in which any incident will result in suspension or expulsion. Unfortunately, many schools still include suspension and expulsion as potential consequences for bullying, even though they include the required flexibility language. Further efforts need to be made to ensure that suspension and/or expulsion are only used for the most serious of incidents.

### *3.3 Providing guidance on the inclusion of mandatory parental notification*

Many schools included language mandating the notification of parents in an incident of bullying. Parental involvement is certainly an important element in addressing bullying, but unfortunately, mandatory parental notification has the potential to place some youth at increased risk. For example, youth who are LGBT may not be out to potentially hostile parents, and revealing a bullying situation may also disclose the student's real or perceived sexual orientation, creating the potential for parental rejection or other negative outcomes. OHR should provide further guidance on how schools can balance the need to notify parents with this potential risk.

### *3.4 Revise the model policy to include consequences for retaliation*

The YBPA requires that bullying prevention policies not only provide potential consequences for bullying behavior, but also for retaliatory behaviors that are related to a bullying incident. This requirement is not explicitly stated in the model policy, though it could be assumed that consequences apply to both types of behaviors. For clarity purposes, consequences for retaliation should be specifically included in the model policy.

## **Conclusions**

Overall, DC should be lauded for its efforts to not only pass a comprehensive bullying prevention law, but also to ensure educational institutions' compliance with the law. By adopting the recommendations included above, DC will be a role model for the country in its efforts to prevent bullying.



## Individual School Results

**Table 1.**

**LEA Policy Submission and Compliance, Current as of September 30, 2014**

|   | Submitted | Compliant | Revision Submitted |
|---|-----------|-----------|--------------------|
| <i>Public LEA</i>                         |           |           |                    |
| D.C. Public Schools                       | Yes       | Yes       | Yes                |
| <i>Charter LEA</i>                        |           |           |                    |
| Academy of Hope PCS                       | No        | N/A       | N/A                |
| Achievement Prep Academy PCS              | Yes       | No        | No                 |
| Apple Tree Early Learning PCS             | Yes       | Yes       | Yes                |
| BASIS DC PCS                              | Yes       | No        | No                 |
| Bridges PCS                               | Yes       | No        | No                 |
| Briya PCS                                 | Yes       | Yes       | Yes                |
| Capital City PCS                          | Yes       | Yes       | No                 |
| Carlos Rosario International PCS          | Yes       | No        | Yes                |
| Cedar Tree PCS                            | Yes       | Yes       | No                 |
| Center City PCS                           | Yes       | Yes       | Yes                |
| Cesar Chavez PCHS                         | Yes       | Yes       | Yes                |
| Community Academy PCS                     | Yes       | No        | No                 |
| Community College Preparatory Academy PCS | Yes       | No        | No                 |
| Creative Minds International PCS          | Yes       | Yes       | Yes                |
| DC International School                   | Yes       | Yes       | Yes                |
| DC Prep PCS                               | Yes       | No        | No                 |
| DC Scholars PCS                           | Yes       | Yes       | No                 |
| Democracy Prep                            | Yes       | Yes       | Yes                |
| District of Columbia Bilingual PCS        | Yes       | Yes       | No                 |
| E.L. Haynes PCS                           | Yes       | Yes       | Yes                |
| Eagle Academy PCS                         | Yes       | Yes       | Yes                |
| Early Childhood Academy PCS               | Yes       | Yes       | No                 |

|  | Submitted | Compliant | Revision Submitted |
|--|-----------|-----------|--------------------|
| Elsie Whitlow Stokes Community Freedom PCS       | Yes       | Yes       | No                 |
| Excel Academy PCS                                | Yes       | No        | No                 |
| Friendship PCS                                   | Yes       | Yes       | No                 |
| Harmony DC PCS                                   | Yes       | No        | No                 |
| Hope Community PCS                               | No        | N/A       | N/A                |
| Hospitality PCS                                  | Yes       | Yes       | No                 |
| Howard University PCMS                           | Yes       | Yes       | Yes                |
| IDEA Public Charter School                       | Yes       | Yes       | Yes                |
| Ideal Academy PCS                                | No        | N/A       | N/A                |
| Ingenuity Prep PCS                               | Yes       | Yes       | No                 |
| Inspired Teaching Demonstration PCS              | Yes       | No        | No                 |
| KIPP DC  | Yes       | Yes       | Yes                |
| Latin American Montessori Bilingual PCS (LAMB)   | Yes       | No        | No                 |
| LAYC Career Academy PCS                          | Yes       | Yes       | Yes                |
| Lee Montessori PCS                               | Yes       | Yes       | No                 |
| Mary McLeod Bethune PCS                          | Yes       | No        | No                 |
| Maya Angelou PCS                                 | Yes       | Yes       | Yes                |
| Meridian PCS                                     | Yes       | Yes       | Yes                |
| Mundo Verde Public Charter School                | Yes       | Yes       | Yes                |
| National Collegiate Preparatory PCS              | Yes       | Yes       | Yes                |
| Next Step PCS                                    | Yes       | Yes       | Yes                |
| Options PCS                                      | Yes       | No        | No                 |
| Paul PCS   | Yes       | Yes       | Yes                |
| Perry Street Prep PCS                            | Yes       | Yes       | No                 |
| Potomac Prep PCS (Formerly Potomac Lighthouse)   | Yes       | Yes       | Yes                |
| Richard Wright PCS for Journalism and Media Arts | Yes       | Yes       | No                 |
| Roots PCS  | Yes       | Yes       | No                 |
| SEED PCS   | Yes       | No        | No                 |

|  | Submitted | Compliant | Revision Submitted |
|--|-----------|-----------|--------------------|
| Sela PCS   | Yes       | Yes       | No                 |
| Shining Stars Montessori PCS                     | Yes       | Yes       | N/A                |
| Somerset Preparatory Academy PCS                 | Yes       | No        | No                 |
| St. Coletta Special Education PCS                | Yes       | Yes       | Yes                |
| Thurgood Marshall Academy PCS                    | Yes       | Yes       | No                 |
| Tree of Life PCS                                 | Yes       | Yes       | Yes                |
| Two Rivers PCS                                   | Yes       | Yes       | Yes                |
| Washington Latin PCS                             | Yes       | Yes       | Yes                |
| Washington Mathematics Science Technology PCHS   | Yes       | Yes       | Yes                |
| Washington Yu Ying PCS                           | Yes       | Yes       | No                 |
| William E. Doar, Jr. PCS for the Performing Arts | No        | N/A       | N/A                |

|                                |    |       |
|--------------------------------|----|-------|
| Submitted (Charters)           | 57 | 93.4% |
| Compliant (All Charters)       | 42 | 70.5% |
| Compliant (Submitted Charters) | -  | 75.4% |

**Table 2.**  
**Overarching Component Compliance (Initial Submission)**

|  | Statement of Scope | Definition | Code of Conduct and Consequences | Reporting Requirements | Investigation | Appeal | Retaliation | Percentage Subcomponents Compliant |
|--|--------------------|------------|----------------------------------|------------------------|---------------|--------|-------------|------------------------------------|
| DC Public Schools                              | Yes                | No         | Yes                              | Yes                    | No            | No     | Yes         | 82.9%                              |
| Achievement Prep Academy PCS                   | Yes                | Yes        | Yes                              | Yes                    | No            | Yes    | Yes         | 95.1%                              |
| Apple Tree Early Learning PCS                  | No                 | Yes        | No                               | Yes                    | No            | No     | No          | 48.8%                              |
| BASIS DC PCS                                   | Yes                | Yes        | No                               | No                     | No            | Yes    | Yes         | 85.4%                              |
| Bridges PCS                                    | No                 | Yes        | Yes                              | No                     | No            | No     | No          | 58.5%                              |
| Briya PCS                                      | No                 | No         | No                               | No                     | No            | No     | No          | 24.4%                              |
| Capital City PCS                               | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Carlos Rosario International PCS               | No                 | No         | No                               | No                     | No            | No     | No          | 0.0%                               |
| Cedar Tree PCS                                 | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Center City PCS                                | Yes                | Yes        | No                               | Yes                    | Yes           | Yes    | Yes         | 90.2%                              |
| Cesar Chavez PCHS                              | No                 | No         | Yes                              | Yes                    | Yes           | No     | No          | 68.3%                              |
| Community Academy PCS                          | No                 | Yes        | No                               | No                     | No            | No     | No          | 26.8%                              |
| Community College Preparatory                  | Yes                | Yes        | Yes                              | Yes                    | No            | Yes    | Yes         | 95.1%                              |
| Creative Minds International PCS               | No                 | No         | No                               | No                     | No            | No     | No          | 22.0%                              |
| DC International School                        | Yes                | Yes        | No                               | Yes                    | Yes           | No     | Yes         | 70.7%                              |
| DC Prep PCS                                    | No                 | No         | No                               | No                     | No            | No     | No          | 2.4%                               |
| DC Public Schools                              | Yes                | No         | Yes                              | Yes                    | No            | No     | Yes         | 82.9%                              |
| DC Scholars PCS                                | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Democracy Prep                                 | Yes                | No         | No                               | Yes                    | No            | No     | No          | 51.2%                              |
| District of Columbia Bilingual PCS             | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| E.L. Haynes PCS                                | Yes                | Yes        | No                               | Yes                    | Yes           | No     | Yes         | 68.3%                              |
| Eagle Academy PCS                              | Yes                | No         | No                               | Yes                    | No            | Yes    | No          | 75.6%                              |
| Early Childhood Academy PCS                    | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Elsie Whitlow Stokes Community Freedom PCS     | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Excel Academy PCS                              | Yes                | No         | No                               | No                     | No            | No     | Yes         | 48.8%                              |
| Friendship PCS                                 | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Harmony DC PCS                                 | No                 | No         | No                               | No                     | No            | No     | Yes         | 36.6%                              |
| Hospitality PCS                                | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Howard University PCMS                         | No                 | No         | No                               | No                     | No            | No     | No          | 26.8%                              |
| IDEA Public Charter School                     | No                 | No         | No                               | No                     | No            | No     | No          | 9.8%                               |
| Ingenuity Prep PCS                             | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Inspired Teaching Demonstration PCS            | No                 | No         | No                               | No                     | No            | No     | No          | 4.9%                               |
| KIPP DC  | Yes                | Yes        | No                               | Yes                    | Yes           | No     | Yes         | 78.0%                              |
| Latin American Montessori Bilingual PCS (LAMB) | Yes                | No         | Yes                              | Yes                    | No            | Yes    | Yes         | 95.1%                              |
| LAYC Career Academy PCS                        | Yes                | No         | Yes                              | Yes                    | No            | No     | Yes         | 68.3%                              |

|  | Statement of Scope | Definition | Code of Conduct and Consequences | Reporting Requirements | Investigation | Appeal | Retaliation | Percentage Subcomponents Compliant |
|--|--------------------|------------|----------------------------------|------------------------|---------------|--------|-------------|------------------------------------|
| Lee Montessori PCS                             | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Mary McLeod Bethune PCS                        | No                 | No         | No                               | Yes                    | No            | No     | No          | 36.6%                              |
| Maya Angelou PCS                               | Yes                | Yes        | No                               | Yes                    | No            | No     | No          | 36.6%                              |
| Meridian PCS                                   | Yes                | Yes        | Yes                              | Yes                    | No            | Yes    | Yes         | 97.6%                              |
| Mundo Verde Public Charter School              | No                 | No         | No                               | No                     | Yes           | No     | Yes         | 61.0%                              |
| National Collegiate Preparatory PCS            | Yes                | No         | No                               | Yes                    | No            | No     | No          | 36.6%                              |
| Next Step PCS                                  | No                 | No         | No                               | Yes                    | No            | No     | No          | 58.5%                              |
| Options PCS                                    | No                 | No         | No                               | Yes                    | No            | No     | No          | 41.5%                              |
| Paul PCS                                       | No                 | No         | No                               | No                     | No            | No     | Yes         | 34.1%                              |
| Perry Street Prep PCS                          | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Potomac Prep PCS                               | Yes                | Yes        | No                               | Yes                    | No            | No     | No          | 31.7%                              |
| Richard Wright PCS for Journalism and Arts     | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Roots PCS                                      | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| SEED PCS                                       | Yes                | No         | No                               | No                     | No            | No     | No          | 41.5%                              |
| Sela PCS                                       | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Shining Stars Montessori PCS                   | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Somerset Preparatory Academy                   | No                 | No         | No                               | Yes                    | No            | No     | No          | 29.3%                              |
| St. Coletta Special Education PCS              | No                 | Yes        | No                               | Yes                    | Yes           | Yes    | Yes         | 82.9%                              |
| Thurgood Marshall Academy PCS                  | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Tree of Life PCS                               | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | No          | 97.6%                              |
| Two Rivers PCS                                 | No                 | No         | No                               | Yes                    | No            | No     | No          | 43.9%                              |
| Washington Latin PCS                           | No                 | Yes        | Yes                              | Yes                    | Yes           | Yes    | No          | 90.2%                              |
| Washington Mathematics Science Technology PCHS | No                 | No         | No                               | No                     | No            | No     | No          | 29.3%                              |
| Washington Yu Ying PCS                         | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         | 100.0%                             |
| Number Included                                | 37                 | 33         | 28                               | 43                     | 26            | 27     | 34          |                                    |
| Percentage Included                            | 64.9%              | 57.9%      | 49.1%                            | 75.4%                  | 45.6%         | 47.4%  | 59.6%       |                                    |

**Table 3.**  
**Subcomponent Inclusion by Subcomponent (Initial Submission)**

| Component                  | Subcomponent                                    | Number of Policies | Percent of Policies |
|----------------------------|---|--------------------|---------------------|
| <b>Statement of Policy</b> | Enforced On Property                            | 57                 | 98.3%               |
|                            | Electronic Communication On Property            | 52                 | 89.7%               |
|                            | Electronic Communication With Property          | 45                 | 77.6%               |
|                            | Sponsored Functions                             | 50                 | 86.2%               |
|                            | Your Transportation                             | 44                 | 75.9%               |
|                            | Sponsored Transportation                        | 43                 | 74.4%               |
|                            | Electronic Communication Interference           | 38                 | 65.5%               |
| <b>Definition</b>          | Definition                                      | 33                 | 56.9%               |
| <b>Code of Conduct</b>     | Code of Conduct                                 | 44                 | 75.9%               |
|                            | List of Consequences                            | 47                 | 81.0%               |
|                            | Appropriately Corrected                         | 37                 | 63.8%               |
|                            | Prevent Another Occurrence                      | 38                 | 65.5%               |
|                            | Protect Target                                  | 38                 | 65.5%               |
|                            | Flexible to Individual Incident                 | 38                 | 65.5%               |
|                            | Nature of Incident                              | 36                 | 62.1%               |
|                            | Developmental Age of Person Bullying            | 35                 | 60.3%               |
|                            | Behavior History of Person Bullying             | 35                 | 60.3%               |
| <b>Reporting</b>           | Procedure for Reporting Bullying or Retaliation | 49                 | 84.5%               |
|                            | Anonymous Reporting                             | 42                 | 72.4%               |
|                            | No Formal Response                              | 42                 | 72.4%               |

|                              |  |       |       |
|------------------------------|--|-------|-------|
| <b>Investigation</b>         | Reports of Policy Violations                 | 45    | 77.6% |
|                              | Complaints of Bullying or Retaliation        | 48    | 82.8% |
|                              | Name of Investigator                         | 26    | 44.8% |
|                              | Contact Information of Investigator          | 29    | 50.0% |
| <b>Appeals</b>               | Person Accused                               | 32    | 55.2% |
|                              | Target                                       | 29    | 50.0% |
|                              | Unsatisfied Persons                          | 32    | 55.2% |
|                              | Unsatisfied Party May Appeal                 | 36    | 62.1% |
|                              | 30 Days For Appeal To Be Made                | 31    | 53.5% |
|                              | Secondary Investigation Completed 30 Days    | 32    | 55.2% |
|                              | Circumstances Require Time                   | 30    | 51.7% |
|                              | Circumstances Set in Writing                 | 30    | 51.7% |
|                              | Additional Time Not More Than 15 Days        | 30    | 51.7% |
| Informed of Human Rights Act | 29   | 50.0% |       |
| <b>Retaliation</b>           | Employee Volunteer Youth Shall Not Retaliate | 48    | 82.8% |
|                              | Statement Prohibiting Retaliation            | 48    | 82.8% |
|                              | Victim                                       | 36    | 62.1% |
|                              | Witness                                      | 38    | 65.5% |
|                              | Person Who Reports                           | 44    | 75.9% |
|                              | Someone With Reliable Information            | 37    | 63.8% |
|                              | Employee Volunteer Youth Shall Report        | 40    | 49.0% |

**Table 4.**

**Overarching Component Compliance (Current as of September 30, 2014; Submitted Policies)**

|  | Statement of Scope | Definition | Code of Conduct and Consequences | Reporting Requirements | Investigation | Appeal | Retaliation |
|--|--------------------|------------|----------------------------------|------------------------|---------------|--------|-------------|
| DC Public Schools                              | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Achievement Prep Academy PCS                   | Yes                | Yes        | Yes                              | Yes                    | No            | Yes    | Yes         |
| Apple Tree Early Learning PCS                  | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| BASIS DC PCS                                   | Yes                | Yes        | No                               | No                     | No            | Yes    | Yes         |
| Bridges PCS                                    | No                 | Yes        | Yes                              | No                     | No            | No     | No          |
| Briya PCS                                      | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Capital City PCS                               | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Carlos Rosario International PCS               | No                 | Yes        | No                               | No                     | No            | No     | No          |
| Cedar Tree PCS                                 | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Center City PCS                                | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Cesar Chavez PCHS                              | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Community Academy PCS                          | No                 | Yes        | No                               | No                     | No            | No     | No          |
| Community College Preparatory                  | Yes                | Yes        | Yes                              | Yes                    | No            | Yes    | Yes         |
| Creative Minds International PCS               | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| DC International School                        | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| DC Prep PCS                                    | No                 | No         | No                               | No                     | No            | No     | No          |
| DC Scholars PCS                                | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Democracy Prep                                 | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| District of Columbia Bilingual PCS             | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| E.L. Haynes PCS                                | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Eagle Academy PCS                              | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Early Childhood Academy PCS                    | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Elsie Whitlow Stokes Community Freedom PCS     | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Excel Academy PCS                              | Yes                | No         | No                               | No                     | No            | No     | Yes         |
| Friendship PCS                                 | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Harmony DC PCS                                 | No                 | No         | No                               | No                     | No            | No     | Yes         |
| Hospitality PCS                                | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Howard University PCMS                         | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| IDEA Public Charter School                     | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Ingenuity Prep PCS                             | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Inspired Teaching Demonstration PCS            | No                 | No         | No                               | No                     | No            | No     | No          |
| KIPP DC  | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Latin American Montessori Bilingual PCS (LAMB) | Yes                | No         | Yes                              | Yes                    | No            | Yes    | Yes         |
| LAYC Career Academy PCS                        | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |



|  | Statement of Scope | Definition | Code of Conduct and Consequences | Reporting Requirements | Investigation | Appeal | Retaliation |
|--|--------------------|------------|----------------------------------|------------------------|---------------|--------|-------------|
| Lee Montessori PCS                             | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Mary McLeod Bethune PCS                        | No                 | No         | No                               | Yes                    | No            | No     | No          |
| Maya Angelou PCS                               | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Meridian PCS                                   | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Mundo Verde Public Charter School              | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| National Collegiate Preparatory PCS            | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Next Step PCS                                  | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Options PCS                                    | No                 | No         | No                               | Yes                    | No            | No     | No          |
| Paul PCS                                       | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Perry Street Prep PCS                          | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Potomac Prep PCS                               | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Richard Wright PCS for Journalism and Arts     | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Roots PCS                                      | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| SEED PCS                                       | Yes                | No         | No                               | No                     | No            | No     | No          |
| Sela PCS                                       | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Shining Stars Montessori PCS                   | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Somerset Preparatory Academy                   | No                 | No         | No                               | Yes                    | No            | No     | No          |
| St. Coletta Special Education PCS              | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Thurgood Marshall Academy PCS                  | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Tree of Life PCS                               | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Two Rivers PCS                                 | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Washington Latin PCS                           | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Washington Mathematics Science Technology PCHS | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
| Washington Yu Ying PCS                         | Yes                | Yes        | Yes                              | Yes                    | Yes           | Yes    | Yes         |
|  |                    |            |                                  |                        |               |        |             |
| Number Included                                | 49                 | 49         | 47                               | 49                     | 43            | 47     | 49          |
| Percentage Included                            | 86.0%              | 86.0%      | 82.5%                            | 86.0%                  | 75.4%         | 82.5%  | 86.0%       |