

## Protecting Chicago's Children: CPS Plan of Action

Nothing is more important to Chicago Public Schools than the safety and wellbeing of our students. Parents and families entrust us to educate and safeguard their children, and that trust is sacred. Over the years, CPS has continuously improved efforts protect students, but we must be vigilant and address any issues that could endanger children.

Most importantly, if you suspect abuse, please report it immediately to the Illinois Department of Children and Family Services (DCFS). The 24-hour hotline is: 800-25-ABUSE, or 800-252-2873. All CPS staff are mandatory reporters of any physical or sexual abuse of children, and all employees attest to understanding this responsibility as a condition of their employment.

To ensure that CPS is doing everything possible to prevent abuse, the Board of Education has asked an independent, outside expert to review all practices, policies, and procedures for addressing instances of alleged sexual misconduct, harassment, or abuse. Maggie Hickey, former Assistant United States Attorney and Illinois Executive Inspector General, will lead this top-to-bottom review. CPS will share her final recommendations and our plans for implementing the recommendations with you as soon as possible.

CPS has also removed all employees who are accused of sexual abuse from schools pending the outcome of an investigation.

In addition, CPS is taking several immediate steps, particularly concerning background checks, support for students, investigations into employee misconduct, and training and guidance. CPS will also work with partners in Springfield to address changes in state law to better protect students.

### Next Steps: Immediate Improvements

#### Background Checks

All CPS employees are subject to a background check of criminal activities and child abuse or neglect; however, background checks alone do not provide the certainty we need about the quality of our hires. CPS has identified the following steps to strengthen how we screen prospective employees as well as maintain the most up-to-date information for existing employees.

- CPS will begin conducting background checks for current employees on a periodic basis. While the Illinois State Police, Chicago Police Department, and other agencies notify CPS when an existing employee is accused or convicted of a crime, this is not a perfect system. Ongoing background checks provide an additional avenue to learn about employees who are accused of or commit crimes after they've been hired.
- By the 2018-19 school year, CPS will establish a centralized eligibility process for all athletic coaches and assistant coaches, whether volunteers or employees. This will enable CPS' Sports Administration Department to better ensure coaches are not only screened effectively, but are also trained prior to beginning coaching activities.
- CPS will establish additional processes and resources, beyond our background checks, that schools can use to effectively check candidates' references. Reference checks provide an additional avenue to uncover allegations of abuse or disciplinary actions from prior jobs that are not reported in background checks conducted by law enforcement and/or DCFS.

### **Additional Student Support**

Supporting student victims and their families is a critical priority, and CPS is making the following immediate improvements.

- When an investigation into alleged physical or sexual abuse begins, the Law Department will notify the Chief Education Office and Talent Office to ensure that all appropriate student supports are in place, including safety plans and counseling.
- CPS will develop a standard framework for comprehensively investigating and addressing each reported incident, with a particular emphasis on providing support for victims. Responses to each incident will include a review of whether the appropriate services and supports were provided to the student and family and a protocol for following up with the student and family to identify and address ongoing challenges.
- The district will implement a public awareness campaign in schools, district offices, and City of Chicago facilities to raise awareness of child abuse and the responsibilities of mandated reporters. This campaign will be developed in the coming months and implemented during the 2018-19 school year. It will encourage all parties – students, employees, families, and members of the public – to report suspected abuse.

### **Investigations into Employee Misconduct**

CPS will review and strengthen its process for investigating alleged employee misconduct.

- CPS will review its investigations into reports of sexual assault and misconduct allegations and take necessary steps to strengthen those processes.
- CPS adjusted its policy and will begin immediately removing any employees who are accused of sexual abuse from schools pending the outcome of an investigation, rather than waiting to determine if credible evidence existed before removing employees.
- In the standard investigation framework noted above, CPS will also evaluate whether there were warning signs that could have triggered an earlier investigation and the adequacy of the response of the school and Central Office when the incident became known.

### **Training and Guidance for Staff**

CPS will also update employee training to ensure every employee fully understands their role in helping prevent crimes against students.

- In June 2018, the Board of Education will consider a revised Board Policy that will require all employees to report signs of predatory behavior. If approved, the policy would also require:
  - Reporting of grooming behaviors, a sign of potential future predatory acts; and
  - Reporting of inappropriately intimate relationships between staff and students.
- During the 2018-19 school year, CPS will retrain all employees on their obligations as mandated reporters of any physical or sexual abuse of children— which is something that all CPS employees are trained on and attest to as a condition of their employment.
- The district will implement a public awareness campaign in schools, district offices, and City of Chicago facilities to raise awareness of child abuse and the responsibilities of reporting suspected abuse. This campaign will be developed in the coming months and implemented during the 2018-19 school year.
- During the 2018-19 school year, CPS will offer staff trainings on sexual harassment. This work will be carried out under the direction of a new district-wide Title IX officer, who will be

responsible for evaluating all district initiatives and matters involving sexual discrimination and sexual misconduct.

- Before the end of the calendar year, CPS will train all employees on appropriate interactions between adults and students.

### Legislative Efforts

In addition to the significant process improvements and policy changes the district is committed to making, CPS will work with legislators in Springfield to make changes to state law that will help keep students safer in school in every district in the state. Several potential areas for improvements include:

- **Allow CPS and other districts to more easily remove predators from classrooms and prevent re-traumatizing victims.** Removing abusers from the school system often requires student victims to testify at a hearing in front of the alleged abuser. This has resulted in cases that are decided in favor of the alleged abuser because the victim declined to testify. Additional safeguards should be created to avoid re-traumatizing students by requiring them to testify before strangers and their alleged abuser.
- **Remove barriers to sharing information about predators.** Barriers should be removed to allow districts to more easily share discipline information about former employees so that people who pose a threat to students are not able to find work in a new district. Some of these barriers include provisions of the Personnel Records Review Act and Employment Records Review Act.
- **Use ISBE's teacher licensure processes to better safeguard students.** ISBE's educator licensure processes can be amended to incorporate additional vigilance in the protection of students, particularly during the license renewal period.

### Appendix: CPS' Recent Efforts to Improve Safeguards for Students

Over the past several years, CPS has taken significant action to improve protections for students. CPS will not rest until the district is confident that all possible measures have been put in place to protect students.

#### Strengthening Background Checks

Below is a brief history of the improvements CPS has made to its background check process.

- 2014: CPS began requiring coaches and other volunteers who are regularly in schools to pass a fingerprint-based criminal background check before volunteering at a school.
- 2016: CPS began to check all prospective employees with DCFS for findings of child abuse or neglect.
- 2017: CPS reached agreements with nearly all Chicago charter school networks to ensure prospective charter school employees' background checks would be as rigorous as the checks CPS performs. State law allows charters to make this decision, and CPS cannot require them to use its process. CPS publishes a list of charters that have refused to adopt the district's background checks.
- 2017: CPS advised charter schools of employees who were previously dismissed from CPS for issues involving physical abuse.
- 2017: CPS began requiring all vendor employees who have direct daily contact with CPS students to go through CPS' criminal background adjudication and the DCFS check process, as opposed to using an independent process determined by the vendors.

### **Strengthening Investigations into Employee Misconduct**

Below is a brief history of the improvements CPS has made to its process to investigate employee misconduct.

- 2015: CPS established a Discipline Committee to review investigations and determine an appropriate disciplinary response.
  - In addition to Law Department attorneys, the committee includes education administrators, auditors, and Talent Office (HR) representatives. The purpose is to ensure that disciplinary decisions are not solely legal decisions, and that the employees' conduct and the district's course of action is viewed through multiple lenses to ensure the best possible judgment is reached to protect children.

### **Strengthening Training and Guidance for Staff**

Below is a brief history of the improvements CPS has made to its background check process.

- 2016: At the mandatory legal conference for all principals and administrators, CPS provided training sessions on recognizing behaviors indicative of physical and sexual abuse and the expectation that reference calls are conducted for all hires. Similar sessions are to be conducted annually every year moving forward.
- 2016: The Departments of Safety & Security, Health & Wellness, and Law collaborated to develop a resource guide for principals that includes a response tree that can be consulted when incidents of sexual violence are reported.
- 2017: CPS distributed guidance to principals on maintaining professional staff/student boundaries. The guidelines provide clarity and impose strict conditions on electronic communication, interactions with students, travel, and reporting requirements. The guidelines can be found at [bit.ly/cpsstaffguidance](https://bit.ly/cpsstaffguidance).