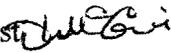


ED COMMITTEE #1  
November 9, 2015  
**Update**

**MEMORANDUM**

November 5, 2015

TO: Education Committee

FROM: Essie McGuire, Senior Legislative Analyst 

SUBJECT: **Update – MCPS Policies and Procedures Related to Allegations of Child Abuse and Neglect**

Today the Education Committee will receive an update on Montgomery County Public Schools (MCPS) policies and procedures related to allegations of child abuse and neglect. Dr. Maria Navarro, Chief Academic Officer, MCPS, and Dr. Andrew Zuckerman, Chief Operating Officer, MCPS, are expected to attend and brief the Committee.

In the summer of 2014, MCPS convened a work group to review MCPS practices and policies related to allegations of child abuse and neglect. The work group's report included a comprehensive set of recommendations to build a systematic approach to preventing, recognizing, and reporting child abuse and neglect in MCPS. The Board received an update report from the work group on January 13, 2015 and in February 2015 the Education Committee also received this update report.

At that time, MCPS was beginning to develop action plans to implement the recommendations. The Board has received updates on this process throughout the year, most recently in an October 20 memorandum. The purpose of today's briefing is to update the Committee on the work this year to implement many elements of the recommendations.

The October 20 update to the Board is attached on circles 1-6. Council staff highlights below some of the update information.

**Policies and protocols**

MCPS has developed or updated several policies and protocols related to child abuse and neglect.

- **Board Policy JHC, Child Abuse and Neglect:** The Board adopted a revised version of this policy on June 29. The full policy is attached on circles 11-16; Board memoranda describing the policy are

attached on circles 7-10. The policy outlines (circles 14-15) specific implementation strategies to ensure that employees understand and are accountable for responsibilities to prevent and report child abuse and neglect, that MCPS coordinates fully with partner agencies including public safety, and that parents, contractors, volunteers, and the community are also informed and included in these efforts. The policy also includes reporting requirements to the Board both about implementation of the policy and about the numbers and outcomes of cases of suspected abuse and neglect.

- MCPS also developed *revised protocols* for reporting and investigating child abuse and neglect cases. These protocols are outlined fully in Regulation JHC-RA, “Reporting and Investigating Child Abuse and Neglect”.
- A *Memorandum of Understanding* for the investigation of reports of abuse and neglect involving children and vulnerable adults was signed in August by MCPS, DHHS, Police, the Office of the State’s Attorney, and the Treehouse Child Assessment Center of Montgomery County.
- At the beginning of this school year MCPS distributed to all employees a new *Employee Code of Conduct*. This code summarizes standards of conduct in many areas as well as disciplinary procedures that can be used.
- Circle 3 details the steps taken to designate systemwide child abuse contacts including school-based liaisons, central office representatives, and processes both for coordinating services for students and for assisting MCPS employees through the reporting process.

### **Background screening**

Circles 3-4 outline the processes for screening new and existing employees, volunteers, and outside contractors.

- *Employees* are required to undergo a criminal background screening, including fingerprinting, and a Child Protective Services background screening.
- *Contractors* are required to have a criminal background screening, including fingerprinting, and in some cases will be required to have training as well. A “Frequently Asked Questions” document (attached on circles 22-25) provides a useful overview of the variety of circumstances and requirements that can occur with contractors.
- Due to the large number of *volunteers* that interact in the school system, MCPS has identified two categories of volunteers to focus initial screening requirements: volunteer coaches and overnight chaperones. MCPS notes that volunteers signing in and out of schools through the Visitor Management System are screened through state and local sex offender registries. MCPS is focusing its efforts at this time on volunteers who would be unsupervised with students and will continue to review protocols for volunteers.

## **Training**

- Circle 1 describes the training plan put in place for MCPS employees this year. All employees are required to complete a combination of online and in person training, with different requirements for employees with different levels of interaction with students and supervisory responsibilities.
- The online training consists of two modules, “Preventing Child Abuse and Neglect” and “Policies for Responding to and Reporting Abuse”. The training modules contain video contributions from agency partners, including the Director of Health and Human Services, the Police Chief, and the State’s Attorney. The modules also include videos of MCPS staff and mental health experts.

The online training modules emphasize the employees’ responsibility to be aware of situations in which abuse can occur and to report any suspected abuse or neglect. The training gives very specific signs to recognize and steps to take both to prevent abuse and in the event abuse or neglect is suspected.

- In addition to training requirements for employees and contractors, MCPS has identified a training plan for volunteers. Circles 17-21 outline the components of this plan. As with screening, due to the large number of volunteers that interact with the school system, MCPS has identified specific categories of volunteers to focus initial efforts. These relate primarily to volunteers with direct and unsupervised access to students.

## **Education**

- Circles 5-6 outline communication, outreach, and education efforts aimed at increasing knowledge among students, families, and the community about child abuse and neglect. These include curriculum components as well as parent workshops. Outreach efforts have also included work with the MCCPTA and other parent organizations.

Office of the Superintendent of Schools  
MONTGOMERY COUNTY PUBLIC SCHOOLS  
Rockville, Maryland

October 20, 2015

MEMORANDUM

To: Members of the Board of Education

From: Larry A. Bowers, Interim Superintendent of Schools

Subject: Update on Implementation of Policy JHC, Child Abuse and Neglect

The purpose of this memorandum is to update you on the implementation of the comprehensive approach to recognizing, reporting, and preventing abuse and neglect of children and vulnerable adults that the Montgomery County Board of Education endorsed in its revisions to Policy JHC, *Child Abuse and Neglect* (Attachment A). We are pleased to report that we have made significant progress since the Board took final action on the revisions to Policy JHC on June 29, 2015. This memorandum summarizes the steps that staff members have taken to implement each of the procedures that the Board expressly authorized to implement Policy JHC, including a status report on the required professional learning for all employees since the beginning of the 2015–2016 school year.

- 1. Provide, with support from national and local experts, including County partner agencies, appropriate professional development to support Montgomery County Public Schools (MCPS) employees in implementing this policy, and offer training and information opportunities, as appropriate, to MCPS contractors and volunteers.**

With support from Praesidium, Inc. and feedback from County partner agencies and other stakeholders, MCPS enhanced its annual professional development to support MCPS employees in implementing Policy JHC. All employees were required to complete a combination of face-to-face and/or online instruction, tailored as appropriate to the needs of employees at each level of the organization, by October 16, 2015.

The online instruction component consists of two modules, which take approximately 30 minutes each to complete, entitled: *Preventing Child Abuse and Neglect* and *Policies for Responding to and Reporting Abuse*. Each module includes an evaluation instrument to assess staff member learning. As a companion to the online modules, face-to-face training was developed using scenarios and examples to further enhance employee understanding of these topics. Principals, central office supervisors, and school-based child abuse liaisons received a 90-minute face-to-face training, providing them with the tools and resources to conduct face-to-face training sessions for staff members in their schools, offices, and departments, which were intended to take approximately 30 minutes to complete. Many schools completed the face-to-face training during preservice week.

In addition, approximately 40 central services staff members were trained to be master trainers, with assistance provided by staff members from Praesidium, Inc. These master trainers have supported schools and departments by providing face-to-face professional development and responding to questions.

As of the October 16, 2015, deadline, 97 percent of full-time, school-based employees completed the online training. Ninety-three percent of full-time, non-school-based employees participated in training.

Completion of the training requirements had been closely monitored and tracked, and a progressive discipline process will be applied for those employees who did not complete the requirements by the October 16, 2015, deadline. The first step of this process will entail a reminder e-mail message to any employee who has not completed his/her online training. Supervisors also will receive a list of those employees at their work location who have not yet taken the training, and will be encouraged to coordinate a time with their employees to ensure the training is completed. Employees will have three additional weeks to complete their training following receipt of their reminder e-mail. Failure to complete the training after receiving the reminder e-mail will result in a formal letter of reprimand, coordinated through the Office of Human Resources and Development (OHRD). Subsequent disciplinary measures will be applied, up to and including termination of employment with MCPS, for employees who continue to fail to take the required training.

Going forward, the professional learning modules will be adapted and updated to provide training for new hires, as well as contractors and volunteers. This will be discussed further in this memorandum.

2. **Establish and maintain a Memorandum of Understanding (MOU) with County partner agencies, including Child Protective Services (CPS), the Montgomery County Police Department, and the State's Attorney's Office, to establish procedures for the purposes of reporting and investigating suspected child abuse and/or neglect.**

Through a collaborative process, MCPS and County partner agencies reached agreement in early August 2015 on revisions to a MOU for the Investigation of Reports of Abuse and Neglect Involving Children and Vulnerable Adults (Attachment B). The MOU is aligned with the Board's revisions to Policy JHC and reflects revisions to MCPS Regulation JHC-RA, *Reporting and Investigating Child Abuse and Neglect*, which were approved on August 5, 2015, (Attachment C). The revisions to Regulation JHC-RA also were the product of close collaboration with County partner agencies and benefited from input provided by national experts at Praesidium, Inc., who assisted in the policy development process, and from stakeholders' feedback and public comments. Following the revisions to Policy JHC and Regulation JHC-RA and the County partner agency MOU, MCPS has modified other procedural documents, such as MCPS Form 335-44: *Report of Suspected Abuse and Neglect* (Attachment D), which MCPS employees, volunteers, and contractors use to submit written reports of suspected abuse or neglect.

From the beginning of the school year, staff members have been in close communication with County partner agencies to ensure effective implementation of the revised MOU and Regulation JHC-RA and debrief lessons learned. In addition, we also are working with County partner agencies to enhance the safeguards against unauthorized disclosure of information regarding child abuse reports, consistent with state law.

- 3. Designate one or more MCPS systemwide child abuse contacts and establish a process to provide coordinated services to any student who is the subject of an abuse and/or neglect report. This process should include school-based liaisons, and representatives of appropriate offices and departments.**

For the 2015–2016 school year, Dr. Donna S. Hollingshead, associate superintendent of school administration, Office of School Support and Improvement, has been designated as the MCPS systemwide child abuse contact. Pursuant to Regulation JHC-RA, Dr. Hollingshead serves as the primary systemwide contact in collaborating and consulting with County partner agencies and coordinating MCPS staff member response to reports of suspected abuse or neglect. As appropriate, Dr. Hollingshead designates other staff members to assist in fulfilling the responsibilities identified in Regulation JHC-RA.

The Department of Student Services (DSS) serves as the primary contact to support professional development efforts and to provide technical assistance to the child abuse liaisons, school counselors, psychologists, and pupil personnel workers. DSS staff collaborates with the MCPS systemwide child abuse contact and County partner agencies as necessary to ensure schools receive support during an emergency situation.

In addition, each principal has appointed a school counselor or other staff member as a school-based child abuse liaison. Pursuant to Regulation JHC-RA, the role of the school-based child abuse liaison is to assist the principal in providing professional development for school-based personnel in recognizing, reporting, and preventing abuse and neglect. Furthermore, after a report of alleged abuse or neglect is made, the school-based child abuse liaison provides support to the principal in responding to the allegation and serving as a point of contact for County partner agencies and coordinating support for the alleged student victim. In August 2015, all school-based child abuse liaisons received targeted professional development in recognizing, reporting, and preventing abuse and neglect from DSS.

- 4. Develop processes for screening new and existing employees, as well as volunteers and outside contractors who have direct, unsupervised, and uncontrolled access to children on MCPS property.**

*Employees.* All new MCPS employees are required to undergo a criminal background check, including fingerprinting. In addition, since 2013, new MCPS employees also have been required to complete a CPS background screening. As part of the enhancements to our processes, all current employees hired before 2013 also will be subject to a CPS screening. The Board's Fiscal Year 2016 budget included funding for CPS to hire an additional staff member to conduct these screenings for current employees. MCPS staff members are working with CPS on the logistics for these screenings. In addition, we are developing a new MCPS regulation that will require employees to self-report arrests and convictions for certain criminal offenses, and we also are revising our procedures for addressing alleged misconduct by substitute teachers. To support this work, as part of the recent reorganization of OHRD, an assistant director position has been

added to the Performance Evaluation and Compliance Unit, and modifications are under way to the systems and technology OHRD uses to track employee investigations and maintain personnel records.

*Contractors.* In July 2015, a new state law went into effect requiring criminal background screening, including fingerprinting, for all contractors who have direct, unsupervised, and uncontrolled access to children on MCPS property. The revisions to Policy JHC and Regulation JHC-RA were carefully formulated to comply with the new legal requirements. During the summer, the Department of Materials Management (DMM) and the Department of Facilities Management, with support from other staff members, developed new procedures that implement a number of safeguards beyond even what the law requires. For instance, all contractors who have direct, unsupervised, and uncontrolled access to children on MCPS property and clear the required criminal screening now are required to obtain identification badges and receive informational materials and/or training on recognizing, reporting, and preventing child abuse and neglect. A summary of the MCPS procedures for screening contractors, as well as responses to frequently asked questions, are available on the DMM website (Attachment E). In addition, with support from the Office of General Counsel, staff members have revised numerous contractual agreements with contractors to incorporate the new requirements.

*Volunteers.* In developing procedures for training and screening volunteers, staff members in the Office of Community Engagement and Partnerships (OCEP) are proceeding carefully to ensure that more rigorous protections against child abuse and neglect take into account the critical importance of the work that parent/guardian and other community volunteers provide to advance the goals set forth in Board Policy ABC, *Parent and Family Involvement*. As outlined in Regulation ABA-RB, *School Visitors*, and Regulation IRB-RA, *Volunteers in Schools*, all volunteers and other school visitors currently are required to sign in and out of the building using the Visitor Management System (VMS). VMS verifies the volunteer's information from a driver's license or identification card against state and local sex offender registries. All volunteers are issued a visitor's badge that must be worn at all times in the school.

In addition, for the 2015–2016 school year, staff members have identified two categories of volunteers who may have direct, unsupervised, uncontrolled access to students and, thus, are required to undergo training in recognizing, reporting, and preventing child abuse and neglect and criminal background screening: (a) volunteer coaches (who already are required to undergo criminal background screening); and (b) overnight chaperones for the Outdoor Environmental Education Program and other overnight school-sponsored trips. Parents/guardians and other volunteers who are directly supervised by MCPS employees are **not** required to complete training this school year. Volunteers from one of the two identified categories will be invited to attend the face-to-face training or complete the online training module that will be available by January 2016. In addition, the MCPS *Volunteer Coordinator Handbook* is being updated to include information about the implementation of training on recognizing, reporting, and preventing child abuse and neglect for volunteers. MCPS also is exploring opportunities to provide training to volunteers who work in MCPS schools through its district-level strategic partnerships with nonprofit

organizations and government agencies. A memorandum addressing volunteers in more detail is being shared with principals (Attachment F).

**5. Develop a code of conduct and other guidance for MCPS employees and others on MCPS property with clear standards on responsible behavior and appropriate conduct between adults and students.**

The *Employee Code of Conduct* (Attachment G) is a new resource that seeks to bring together, in one document, a summary of the legitimate standards of conduct that MCPS and the broader community expect employees to follow in carrying out their important roles in the school system's mission. In addition, the *Code of Conduct* summarizes the disciplinary procedures that we use to address situations in which employees fall short of our expectations. The *Code of Conduct* was finalized in August 2015, with input from principals, stakeholders in the Child Abuse Advisory Group, Praesidium, Inc., legal counsel, and County partner agencies, as well as the leadership of our employee associations. The *Employee Code of Conduct* was reviewed with principals and administrators at a central services meeting in August 2015 and distributed to all MCPS employees at the beginning of the school year.

**6. Develop a robust learning continuum in the areas of child abuse, personal body safety, and health literacy skills to support our students' education.**

The Comprehensive Health Education (CHE) unit in the Office of Curriculum and Instructional Programs collaborated with the Division of School Counseling, Residency, and International Admissions in DSS to develop a counselor-led curriculum for Kindergarten–Grade 12 to raise awareness of personal safety and issues related to child abuse and neglect prevention and reporting. The curriculum was reviewed by subject matter experts from County partner agencies, as well as by Dr. Bart Klika, co-chair of the Prevention Committee, American Professional Society on the Abuse of Children, and assistant professor in social work, University of Montana. All school counselors received professional development on this curriculum to promote consistency across schools.

The counselor-led curriculum complements the MCPS CHE curriculum, which builds upon the outcomes outlined in MCPS Curriculum 2.0 and applies current comprehensive health education research and practices that are consistent with the goals of the Common Core State Standards. CHE curriculum for elementary students was implemented previously and the curriculum for Grades 6–12 is new for the 2015–2016 school year and led by the health educator at the secondary level.

**7. Develop parent/guardian and community education and awareness programming.**

OCEP is offering several workshop sessions on recognizing, preventing, and reporting child abuse throughout the school year as part of its Parent Academy program. The fall schedule includes two sessions. The first session was held on September 21, 2015, and seven participants were in attendance. The second session will be held on November 23, 2015. In addition, staff members

are adapting the employee professional development models to provide information for parents/guardians and community members, which will be accessible on the MCPS website and that already include additional materials, as well as an introductory video that features the interim superintendent of schools and leaders of County partner agencies.

In recent months, staff members also have shared updated information on the implementation of Policy JHC with parents at the Montgomery County Council of Parent Teacher Associations, Inc. (MCCPTA) Leadership conference, as well as at the MCCPTA Delegates Assembly, and Board of Directors. Staff members will present information sessions at a meeting of the National Association for the Advancement of Colored People Parents' Council and with other parent organizations throughout the year, including school-based Hispanic/Latino parent/guardian groups.

If you have any questions, please contact Dr. Hollingshead, at 301-279-3253 or Ms. Debra A. Berner, director, Department of Student Services, at 301-279-3912.

LAB:MVN:CAR:ear

Attachments

Copy to:

Executive Staff

Ms. Berner

Mr. Hellmuth

Mr. Ikheloa

MONTGOMERY COUNTY BOARD OF EDUCATION  
Rockville, Maryland

April 27, 2015

MEMORANDUM

To: Members of the Board of Education

From: Philip Kauffman, Chair, Board of Education Policy Management Committee

Subject: Tentative Action, Policy JHC, *Child Abuse and Neglect*

Policy JHC, *Child Abuse and Neglect*, reaffirms the Montgomery County Board of Education's commitment to the safety and physical, mental, and emotional well-being of all children and vulnerable adults, and sets forth a comprehensive approach to recognizing, reporting, and preventing abuse and neglect of children and vulnerable adults.

Policy JHC was presented at the March 3, 2015, Policy Management Committee meeting and further discussed at the April 20, 2015, meeting. The revised policy, which sets forth the Board's approach to preventing child abuse and neglect, was developed in close collaboration with partner agencies, including the Montgomery County State's Attorney's Office, the Montgomery County Police Department, and Child Welfare Services in the Montgomery County Department of Health and Human Services, commonly known as Child Protective Services.

The policy sets forth implementation strategies for ensuring that: all employees understand and are held accountable for the highest ethical standards in their conduct, as well as adhering to legal mandates and the moral imperative to recognize, report, and prevent suspected child abuse and neglect; children and vulnerable adults who are alleged victims of abuse and/or neglect are supported; human resource management systems and processes for screening new and existing employees, as well as volunteers and outside contractors, are developed; professional development for Montgomery County Public Schools (MCPS) employees is developed and implemented; and opportunities are provided for parents, outside contractors, volunteers, and the broader community to develop awareness on recognizing, reporting, and preventing abuse and neglect of children and vulnerable adults. A draft of the policy is attached.

Additionally, staff has prepared protocols for reporting and investigating child abuse and neglect cases. This document contains answers to many questions regarding implementing details and will serve as the foundation for regulations to support this policy. Board members will be provided with a copy of a draft of the protocols for reference; additionally, when Policy JHC is released for public comment, a copy of the draft will be accessible to the public, for reference purposes, through the MCPS website. Materials from Praesidium - a nationally recognized consulting firm that reviewed the drafts of the

policy, protocols and planned processes - also are available on the MCPS website at the following address:

<http://www.montgomeryschoolsmd.org/departments/student-services/mental-health/default.aspx?id=395935>.

The following resolution is provided for your consideration:

WHEREAS, Policy JHC, *Child Abuse and Neglect*, has been revised to set forth guidance for complying with child abuse and neglect prevention laws and Montgomery County Public Schools expectations; and

WHEREAS, Policy JHC, *Child Abuse and Neglect*, establishes a collaborative effort between Montgomery County Public Schools and partner agencies, including the Montgomery County State's Attorney's Office, the Montgomery County Police Department, and Child Welfare Services in the Montgomery County Department of Health and Human Services (also known as Child Protective Services) regarding the reporting and investigation of child abuse and neglect; and

WHEREAS, The Policy Management Committee has considered and recommended revisions to Policy JHC, *Child Abuse and Neglect*; now therefore be it

Resolved, That the Board takes tentative action on Policy JHC, *Child Abuse and Neglect*; and be it further

Resolved, That Policy JHC, *Child Abuse and Neglect*, be sent out for public comment.

PK:sd

Attachment

MONTGOMERY COUNTY BOARD OF EDUCATION  
Rockville, Maryland

June 29, 2015

MEMORANDUM

To: Members of the Board of Education

From: Philip Kauffman, Chair, Board of Education Policy Management Committee

Subject: Final Action, Policy JHC, *Child Abuse and Neglect*

On April 27, 2015, the Montgomery County Board of Education tentatively adopted the updated Policy JHC, *Child Abuse and Neglect*, which was developed in close collaboration with stakeholders and partner agencies, including the Montgomery County State's Attorney's Office, the Montgomery County Police Department (MCPD), the County Attorney's Office, and Child Welfare Services in the Montgomery County Department of Health and Human Services, commonly known as Child Protective Services (CPS). In addition, the policy was reviewed by Praesidium—a nationally recognized consulting firm.

The tentatively adopted policy was distributed for public comment. In addition, a draft of updated protocols for reporting and investigating suspected abuse or neglect was made accessible to the public, for reference purposes. Six comments were received. Staff reviewed these comments with stakeholders, partner agencies, and Praesidium, and proposed a number of clarifications. Members of the Board Policy Management Committee further discussed Policy JHC, *Child Abuse and Neglect*, on June 15, 2015, and in response to the comments received from the public, proposed edits to address the following:

- Clarification that in cases of alleged child abuse and/or neglect by a Montgomery County Public Schools (MCPS) employee, contractor, or volunteer, MCPS will collaborate with county partner agencies to ensure that the alleged perpetrator does not present an immediate danger to the safety of the alleged victim and other students.
- Clarification that in cases of alleged child abuse and/or neglect by a MCPS employee, contractor, or volunteer, MCPS will investigate to determine whether the individual has violated Board policies, MCPS regulations, contracts, and/or other guidance, but the internal investigation will be conducted in a manner that does not interfere with or jeopardize any pending investigation by MCPD, CPS, or another external agency—and in particular, MCPS will not interview alleged victims, perpetrators, or witnesses without prior agreement from, and subject to any limitations recommended by, the investigating agency.
- Further emphasizing the importance of protecting the unauthorized disclosure of records or reports concerning abuse, as well as the identity of the reporter.

- Providing additional specification regarding the data to be included in annual reports to the Board regarding suspected abuse or neglect by MCPS employees, contractors, and volunteers.

The Committee Recommended Draft is included as Attachment A. Public comments are summarized in Attachment B. Original comments are included in Attachment C and the Draft for Public Comment is included as Attachment D. Finally, Attachment E includes revisions to the draft protocols in response to further input, including public comments.

The following resolution is provided for your consideration:

WHEREAS, Policy JHC, *Child Abuse and Neglect*, reaffirms the Board of Education's commitment to the safety and physical, mental, and emotional well-being of all children and vulnerable adults, and sets forth a comprehensive approach to recognizing, reporting, and preventing abuse and neglect of children and vulnerable adults; and

WHEREAS, Policy JHC, *Child Abuse and Neglect*, establishes a collaborative effort between Montgomery County Public Schools and partner agencies, including the Montgomery County State's Attorney's Office, the Montgomery County Police Department, and Child Welfare Services in the Montgomery County Department of Health and Human Services (also known as Child Protective Services) regarding the reporting and investigation of child abuse and neglect; and

WHEREAS, The draft of Policy JHC, *Child Abuse and Neglect*, was tentatively adopted by the Board of Education on April 27, 2015, and sent out for public comment; and

WHEREAS, The Board of Education has received comments from the public and the Board Policy Management Committee's recommendations; now therefore be it

Resolved, That the Board of Education adopts Policy JHC, *Child Abuse and Neglect*, as updated in the attached Committee Recommended Draft.

PK:hp

Attachments

# POLICY BOARD OF EDUCATION OF MONTGOMERY COUNTY

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- Related Entries:** ACF, ACF-RA, COB-RA, GME-EA, IOH-RA, IJA-RA, IRB-EA, IRB-RA, JGB-EA, JHC-RA, JHF, JHF-RA, JOA-RA
- Responsible Office:** School Support and Improvement  
Human Resources and Development  
Special Education and Student Services
- Related Sources:** *Annotated Code of Maryland:* Education Article §6-113, Family Law Article, §§5-560, 5-561, 5-701, 5-702, 5-705.2, 5-704, 5-705, 5-708, and Human Services Article, §1-202;  
*Code of Maryland Regulations* 07.02.07.04-.05, 13A.12.05.02, and 13A.08.01.03

## Child Abuse and Neglect

### A. PURPOSE<sup>1</sup>

The Montgomery County Board of Education (Board) reaffirms its commitment to the safety and physical, mental, and emotional well-being of all students. It is the Board's expectation that all children and vulnerable adults have the right to be protected from abuse and neglect. The Board embraces a comprehensive approach to recognizing, reporting, and preventing abuse and neglect of children and vulnerable adults. In addition, the Board recognizes the unique role that Montgomery County Public Schools (MCPS) may play in raising awareness for issues of child abuse and neglect among parents/guardians and the broader community. To this end, the Board emphasizes the importance of developing and implementing a systemic plan for—

1. ensuring that all employees understand and are held accountable for the highest ethical standards in their conduct, as well as adhering to legal mandates and the moral imperative to recognize, report, and prevent suspected child abuse and neglect;

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<sup>1</sup> Regulation JHC-RA, *Child Abuse and Neglect*, contains definitions of the following terms that are utilized in this Policy: abuse; neglect; school-based child abuse liaisons; child; vulnerable adult; MCPS employees; MCPS contractors; MCPS volunteers; and MCPS property.

2. cooperating fully with investigations of suspected abuse and/or neglect by Montgomery County (County) partner agencies, including the Montgomery County State's Attorney's Office, the Montgomery County Police Department (MCPD), and Child Welfare Services in the Montgomery County Department of Health and Human Services (MCDHHS), commonly known as Child Protective Services (CPS), as well as other external agencies;
3. supporting children and vulnerable adults who are alleged victims of abuse and/or neglect, in consultation with County partner agencies;
4. enhancing human resource management systems and processes for screening new and existing employees, as well as volunteers and outside contractors who have direct, unsupervised, and uncontrolled access to children on MCPS property;
5. designing professional development for MCPS employees with support from national and local experts and in accordance with the most current practices for identifying, reporting, and preventing abuse and neglect;
6. offering robust, age-appropriate student learning opportunities across all grade levels in the prevention and reporting of abuse and neglect; and
7. providing opportunities for parents, outside contractors, volunteers, and the broader community to develop awareness on recognizing, reporting, and preventing abuse and neglect of children and vulnerable adults.

**B. POSITION**

1. Reporting and Responding To Suspected Child Abuse and Neglect
  - a) All MCPS employees, contractors, and volunteers are personally and directly required to report any suspected instances of abuse and/or neglect of a child to CPS, pursuant to reporting protocols developed in collaboration with County partner agencies. To enhance safeguards for suspected abuse incidents involving an alleged sexual offense, MCPS and the County partner agencies shall develop additional protocols to facilitate prompt notification to the Special Victims Investigations Division of the MCPD.<sup>2</sup>
  - b) If an individual has any doubt about whether to report suspected abuse and/or neglect, he/she shall err on the side of reporting the allegation to CPS.

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<sup>2</sup>Cases of suspected abuse and/or neglect of a vulnerable adult shall be reported to the Aging and Disabilities Services Information and Assistance Unit in the MCDHHS.

- c) Prior to making a report to CPS, it is not the role of any MCPS employee, contractor, or volunteer to investigate or determine the validity of a case of suspected abuse and/or neglect.
- d) MCPS employees, contractors, and volunteers shall not take any action that may prejudice an investigation of suspected abuse and/or neglect by CPS, the MCPD, or other external agencies.
- e) In every case of alleged child abuse and/or neglect by a MCPS employee, contractor, or volunteer, the following additional procedures shall be followed:
  - (1) The appropriate MCPS offices and County partner agencies will ensure that the alleged offender does not present an immediate danger to the safety of the alleged victim and other students.
  - (2) As such cases may involve potential violations of Board policies, MCPS regulations, contracts, and/or other guidance, an internal investigation will be conducted by MCPS consistent with all applicable Board policies and MCPS regulations. However, while any investigations by any external agencies are pending, MCPS may not interview witnesses, alleged victims, or alleged perpetrators without prior agreement from, and subject to any limitations recommended by, the investigating agency. In addition, MCPS must conduct all internal investigations in a manner that is fully cooperative with the external agency that is investigating and that does not interfere with or jeopardize the external investigation.

## 2. Confidentiality, Immunity, and Protection Against Retaliation

- a) Any person who in good faith makes or participates in making a report of abuse and/or neglect or who participates in an investigation or a resultant judicial proceeding is immune under Maryland law from any civil liability or criminal penalty that would otherwise result from making a report of abuse and/or neglect, or participating in an investigation or a resultant judicial proceeding.
- b) No MCPS employee, contractor, or volunteer may intentionally prevent or interfere with the making of reports of abuse and neglect.
- c) When MCPS employees, contractors, and volunteers come forward and make good-faith reports of abuse and/or neglect and/or participate in an investigation of abuse and/or neglect, MCPS shall strive to protect them from intimidation, harassment, or reprisals/retaliation for those actions.

- d) When students are victims or witnesses of abuse and/or neglect or when they come forward and make good-faith reports of abuse and/or neglect and/or participate in an investigation of abuse and/or neglect, MCPS shall strive to protect them from intimidation, harassment, or reprisals/retaliation for those actions.
- e) Unauthorized disclosure of records or reports concerning suspected abuse and/or neglect is a criminal offense under Maryland law. In addition, all MCPS employees, volunteers, and contractors are required to protect the identity of the reporter unless required to do so by law.

3. Consequences For Knowingly Failing To Report Abuse and/or Neglect or Interfering With Reporting

Any MCPS employee, contractor, or volunteer, acting within their professional or service capacity for MCPS, who suspects child abuse and/or neglect and knowingly fails to report it, or intentionally prevents or interferes with reporting, shall be subject to discipline up to and including suspension or dismissal for misconduct in office, discontinuation of contract services, or discontinuation of volunteering privileges, as appropriate. In addition, any certification issued under the authority of the Maryland State Board of Education (MSDE) or another licensing or certification board may be suspended or revoked, based on the criteria set forth in Maryland law.

4. Consequences For Offenses With Respect To Abuse and/or Neglect

If MCPS determines that a MCPS employee, contractor, or volunteer has been involved in abuse and/or neglect or otherwise violated Board policies, MCPS regulations, or guidance, the individual shall be subject to discipline up to and including suspension or dismissal for misconduct in office, termination of services or volunteering privileges, as appropriate. In addition, any certification issued under the authority of MSDE or by another licensing or certification board may be suspended or revoked, based on the criteria set forth in Maryland law.

**C. IMPLEMENTATION STRATEGIES**

The superintendent of schools or designee will set forth procedures to implement this policy, as follows:

- 1. Establish and maintain a Memorandum of Understanding with County partner agencies, including CPS, MCPD, and the State's Attorney's Office to establish procedures for the purposes of reporting and investigating suspected child abuse and/or neglect.
- 2. Designate one or more MCPS systemwide child abuse contacts and establish a process to provide coordinated services to any student who is the subject of an

abuse and/or neglect report. This process should include school-based liaisons, and representatives of appropriate offices and departments.

3. Provide, with support from national and local experts, including County partner agencies, appropriate professional development to support MCPS employees in implementing this policy, and offer training and information opportunities, as appropriate, to MCPS contractors and volunteers.
4. Develop processes for screening new and existing employees, as well as volunteers and outside contractors who have direct, unsupervised, and uncontrolled access to children on MCPS property.
5. Develop a code of conduct and other guidance for MCPS employees and others on MCPS property with clear standards on responsible behavior and appropriate conduct between adults and students.
6. Develop a robust learning continuum in the areas of child abuse, personal body safety, and health literacy skills to support our students' education.
7. Develop parent/guardian and community education and awareness programming.

#### **D. DESIRED OUTCOMES**

1. A safe, engaging, and supportive environment will be provided for all students through vigilant efforts by all members of the MCPS community to recognize, report, and prevent abuse and neglect of children and vulnerable adults.
2. MCPS and County partner agencies will efficiently and effectively collaborate to investigate reports of suspected abuse and neglect and to support children who are the subject of reports of suspected abuse and/or neglect.

#### **E. REVIEW AND REPORTING**

Implementation of this policy shall be evidenced by the following indicators:

1. Key procedures developed to implement this policy will be sent to the Board as items of information.
2. The superintendent of schools will submit to the Board an annual report and additional updates as appropriate which will include the following:
  - a) The number of suspected abuse and/or neglect cases reported by MCPS to law enforcement or protective services agencies.
  - b) A consolidated report regarding suspected abuse and/or neglect by MCPS employees, contractors, and volunteers to include the following:

- i. The number of reports by MCPS involving suspected abuse and/or neglect by MCPS employees, contractors, and volunteers, and a summary of the final disposition of those reports by action taken.
  - ii. A summary description of any arrest and/or charges filed against a MCPS employee, contractor, or volunteer for abuse and/or neglect, based on publicly available documents, as well as a summary of the disposition of each proceeding.
  - iii. The number of letters sent by the superintendent of schools to the Maryland state superintendent of schools requesting the revocation of certificates or licenses as the result of this policy, disaggregated by the reason for the action.
- c) Implementation of strategies set forth in Section C above.
  - d) Information about collaborative efforts regarding child abuse and/or neglect carried out between MCPS and County partner agencies.
3. This policy will be reviewed annually.

*Policy History:* Resolution No. 137-80, February 12, 1980, amended by Resolution No. 853-83, October 11, 1983, amended by Resolution 333-86, June 12, 1986, and Resolution No. 458-86, August 12, 1986, accepted by Resolution No. 518-86, September 22, 1986; reviewed October 10, 2007; amended by Resolution No. 359-15, June 29, 2015.

This e-mail message has been approved for distribution by Dr. Maria V. Navarro, chief academic officer. No hard copy will be provided.

**ACTION REQUIRED**

Office of Community Engagement and Partnerships  
MONTGOMERY COUNTY PUBLIC SCHOOLS  
Rockville, Maryland

October 22, 2015

UPDATED  
MEMORANDUM

To: All Principals

From: Timothy B. Warner, Chief Engagement and Partnership Officer 

Subject: ACTION: Training for Volunteers on Child Abuse and Neglect Procedures

**Summary**

This memorandum provides additional information to address questions related to training for volunteers as part of Montgomery County Public Schools (MCPS) overall efforts to implement Policy JHC, *Child Abuse and Neglect*, fingerprinting, and background checks. Annually, MCPS has more than 10,000 volunteers who collaborate with schools to support academic achievement for students. Due to the large number of volunteers, the district is focusing on specific categories of volunteers.

***Training for Volunteers with Direct, Unsupervised, Uncontrolled Access to Students***

During the 2015–2016 school year, three categories of volunteers who have direct, unsupervised, uncontrolled access to students have been identified: volunteer coaches, **overnight** chaperones and volunteers for the Outdoor Environmental Education Program (OEEP), and chaperones and volunteers for **overnight** school-sponsored field trips. These volunteers are required to participate in training for recognizing, reporting, and preventing child abuse and neglect by the end of the school year. However, the expectation is that volunteers participate in training prior to interacting with students.

• Training Options

- September–December 2015—School-based training for middle school OEEP volunteers and chaperones facilitated by the Office of Community Engagement and Partnerships (OCEP) in collaboration with the OEEP school coordinator. Parents/guardians will be notified of the training dates.
- October 2015–May 2016 (Attachment A)—Systemwide face-to-face training opportunities held in various locations. All volunteers are welcome to attend these trainings.
- January 2016—MCPS is developing an online training module for volunteers that will be available in January 2016. This module also will provide the school system the opportunity to collect data on volunteers and the schools that they serve. The online volunteer training will be translated into multiple languages.

***Training for Volunteers Directly Supervised by MCPS Employees***

Parents/guardians and individuals, that are directly supervised by MCPS employees are **not** required to complete training this school year. These volunteers are invited to attend the face-to-face training or complete the online training module starting in January.

***Training for Volunteers Who Serve through Partnerships with Nonprofit Organizations and Government Agencies that are not Contractors***

MCPS has a cadre of district-level strategic partnerships with nonprofit organizations and government agencies that are not contractors but provide direct services to students. In order to ensure that our district's largest partners are informed about MCPS child abuse and neglect policies and procedures, OCEP staff is providing face-to-face training on recognizing, reporting, and preventing child abuse and neglect to volunteers who serve through these organizations. The strategic partners are Linkages to Learning; Montgomery County Council of Parent-Teacher Associations (MCCPTA); National Association for the Advancement of Colored People (NAACP); Parents' Council; George B. Thomas, Sr. Learning Academy, Inc. Saturday School; and Heyman Interages Center. Additionally, OCEP will use data from the MCPS Partnership Survey to identify additional strategic partners. These organizations will be contacted to determine current practices of requiring criminal background checks and training needs on child abuse and neglect.

***Fingerprinting and Background Checks***

During the 2015–2016 school year, two categories of volunteers are required to complete a criminal background check. Volunteer coaches must continue to have a criminal background check that includes fingerprinting on file with the school prior to working with students. **Beginning in January 2016**, all OEEP overnight chaperones will be required to complete a fingerprinting background check prior to service in the program. A memorandum outlining the process for background checks for OEEP chaperones will be forthcoming.

***Visitor Management System Screening***

All volunteers, as outlined in Regulation IRB-RA, *Volunteers in Schools*, are required to sign in and out of the building using the Visitor Management System (VMS) at the beginning and end of each volunteer activity and to wear an identification name tag at all times. The VMS enables staff to scan a visitor's driver's license or identification card to produce a visitor badge and check the volunteer's information with state and local sex offender registries.

The MCPS *Volunteer Coordinator Handbook* is being updated to include information about the implementation of training on recognizing, reporting, and preventing child abuse and neglect for volunteers.

Please refer to Attachment B for a Summary of the 2015–2016 Training and Background Check Implementation.

**Action**

- Inform volunteer coaches, overnight chaperones and volunteers assisting with OEEP, and chaperones and volunteers for overnight school-based field trips that they are required to complete training on recognizing, reporting, and preventing child abuse and neglect by the end

complete training on recognizing, reporting, and preventing child abuse and neglect by the end of the school year. The expectation is that volunteers participate in training prior to interacting with students.

- Contact OCEP at 301-279-3100 to schedule a school-based child abuse and neglect training for OEEP volunteers and chaperones.
- Direct volunteers to review the attached schedule and register online at [www.montgomeryschoolsmd.org/community-engagement/](http://www.montgomeryschoolsmd.org/community-engagement/) for one of the systemwide volunteer training sessions.
- Check training completion of volunteer coaches, overnight chaperones and volunteers assisting with OEEP, and chaperones and volunteers assisting with overnight school-based field trips in your school.
- Ensure that all volunteers at the local school are screened using the VMS.

**Questions**

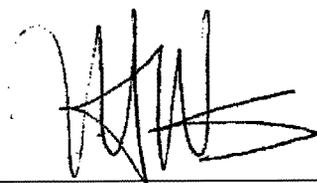
- Contact Mrs. Kimberly A. Bloch-Rincan, partnership project manager, OCEP, at 301-279-2390 or via e-mail.

TBW:daf

**Attachments**

**Copy to:**

- Executive Staff
- Administrative School Secretaries
- Dr. Beattie
- Ms. Berner
- Mrs. Bloch-Rincan
- Mrs. Collins
- Ms. Dawson
- Ms. Jenkins
- Ms. Morrison
- Dr. Steinberg
- Mr. Koutsos
- Mr. Lloyd



Approved: \_\_\_\_\_

Maria V. Navarro, Chief Academic Officer

**Recognizing and Reporting Child Abuse and Neglect Training for Volunteers  
2015–2016 School Year**

Date	Time	Location
Tuesday, November 3, 2015	6:00–7:30 p.m.	Shady Grove Middle School Media Center
Wednesday, December 2, 2015	10:00–11:30 a.m.	CESC Auditorium
Thursday, January 21, 2016	6:00–7:30 p.m.	Argyle Middle School Media Center
Wednesday, February 17, 2016	10:00–11:30 a.m.	CESC Auditorium
Monday, March 14, 2016	6:00–7:30 p.m.	Forest Oak Middle School Media Center
Tuesday, April 12, 2016	6:00–7:30 p.m.	CESC Auditorium
Wednesday, May 4, 2016	9:00–10:30 a.m.	CESC Auditorium
Tuesday, May 31, 2016	6:00–7:30 p.m.	CESC Auditorium

- The training registration link is available on the Office of Community Engagement and Partnerships website: <http://www.montgomeryschoolsmd.org/community-engagement/>.
- During the 2015–2016 school year, three categories of volunteers who have direct, unsupervised, uncontrolled access to students are required to complete a training on recognizing and reporting child abuse and neglect prior to interacting with students. Below are the three categories:
  - Overnight chaperones and volunteers for the Outdoor Environmental Education Program (OEEP)
  - Chaperones and volunteers for overnight school-sponsored field trips
  - Volunteer coaches
- School-based volunteers, such as parents and individuals sponsored through a community partner, who are directly supervised by MCPS employees are **not** required to complete training this school year. However, volunteers are invited to attend an in-person training or complete the online training module beginning in January 2016.

Summary of the 2015–2016 Training and Background Check Implementation

**Implementation: October—December 2015**

Type of Volunteer	Training	Background Check
Overnight chaperones and volunteers for OEEP serving through December 2015	Mandatory In-person Training	Visitor Management System (VMS)
Chaperones and volunteers for overnight school-sponsored field trips serving through December 2015	Mandatory In-person Training	VMS
Volunteer coaches serving between August—December 2015	Mandatory In-person Training	Fingerprinting via MCPS Human Resources
School-based volunteers who are supervised by MCPS employees	Optional In-person Training	VMS

**Implementation: January—June 2016**

Type of Volunteer	Training	Background Check
Overnight chaperones and volunteers for OEEP serving between January—June 2016	Mandatory Online Training Module or In-person Training	Fingerprinting via MCPS Human Resources
Chaperones and volunteers for overnight school-sponsored field trips serving between January—June 2016	Mandatory Online Training Module or In-person Training	VMS
Volunteer coaches serving between January—June 2016	Mandatory Online Training Module or In-person Training	Fingerprinting via MCPS Human Resources
School-based volunteers who are supervised by MCPS employees	Optional Online Training Module or In-person Training	VMS

## **Required Criminal Background Screening Process for Contractors Frequently Asked Questions**

### **1. Which contractors are subject to the criminal background screening process?**

Under a recently enacted Maryland law, any contractor or member of the contractor's work force who will be working in a Montgomery County Public Schools (MCPS) facility where they have direct, unsupervised, and uncontrolled access to students must undergo a criminal background check, including fingerprinting. Examples of contractors requiring this criminal background check are visiting nurses, speech and language pathologists, occupational therapists, physical therapists, resident artists, school photographers, vending machine company staff, and contractors working on specific construction projects. Please contact the Procurement Unit, at 301-279-3555, or the Department of Facilities Management, at 240-314-1060, if you have questions about this requirement.

### **2. How do these new requirements relate to Maryland law on registered sex offenders?**

Both sets of requirements apply to MCPS contractors. Maryland law requires that contractors may not knowingly employ a registered sex offender to work in a school. In addition, a contractor may not knowingly assign a member of its work force to work on school premises with direct, unsupervised, and uncontrolled access to children if the individual has been convicted of, or pled guilty or nolo contendere, to certain sexual offenses, child sexual abuse offenses, and crimes of violence. For a list of those crimes, see Contractors' Obligation Regarding Criminal Records of Individuals Assigned to Work in MCPS Facilities at the following website:

*<http://www.montgomeryschoolsmd.org/departments/procurement>*

The criminal background check requirement is designed to assist contractors in identifying individuals who fall into any of these categories, as well as those who have committed other offenses, that could preclude them from being assigned to an MCPS contract.

### **3. As a principal, I want to hire an individual or group to provide a special program to my students. Does this criminal background screening process apply?**

Yes, the criminal background check, including fingerprinting, applies if the outside contractor will have direct, unsupervised, and uncontrolled access to students. The contract needs to include this language and reflect this expectation. Please contact the Procurement Unit if you need support with contract language. Please also refer to the Financial Manual, Chapter 15, Consultants and Independent Contractors.

### **4. How do these requirements apply to Montgomery County Government (MCG) employees?**

MCG employees, such as nurses and health room technicians, undergo a criminal background check, including fingerprinting, at the time of hire. They must have their MCG-issued identification badge visible or on their person while in the schools. MCPS issues identification badges for county staff in the Linkages to Learning program who have completed the criminal background check screening requirements.

**5. How do these requirements apply to Montgomery College staff working at MCPS sites?**

Montgomery College employees working with the dual enrollment program undergo a criminal background check, including fingerprinting, at the time of hire. They must have their Montgomery College-issued identification badge visible or on their person while in the schools.

**6. Are after-school program providers subject to the Contractor Obligation regulations regarding fingerprinting/background checks?**

Yes, if the after-school program is funded or sponsored by MCPS or MCPS is part of the contract (principal's signature on the contract), then the Contractor Obligation regulations apply, if the after-school program providers have direct, unsupervised, and uncontrolled access to students in an MCPS facility.

**7. If a school's PTA sponsors an after-school activity, enrichment program, or other program, are the providers subject to the Contractor Obligation regulations regarding fingerprinting/background checks?**

No, if the contract is solely sponsored by the PTA, the law does not apply. The law applies to contracts entered into by MCPS. Under MCPS regulations, the contractors involved in a PTA-sponsored activity must check in at the school's main office, be screened through the Visitor Management System (VMS) with their driver's license, and then be escorted throughout the building. In addition, the PTA or the Interagency Coordinating Board may have additional requirements.

**8. Does the new law regarding criminal background checks, including fingerprinting, apply to parents and volunteers?**

No, the law applies only to contractors hired by MCPS. Under MCPS regulations, all parents and volunteers must check in at the school's main office, be screened through the Visitor Management System (VMS) with their driver's license, and then be escorted throughout the building. In addition, MCPS is reviewing policies and protocols to enhance training and screening for volunteers who have direct, unsupervised, and uncontrolled access to children on MCPS property.

**9. Do parents and volunteers need to be trained regarding child abuse and neglect?**

MCPS parents and volunteers who have access to and interact with students, in circumstances where they are not under the direct supervision of MCPS employees, will be required to certify that they have received training and/or reviewed informational materials, as appropriate, regarding recognizing, reporting, and preventing abuse and neglect, consistent with the content provided in professional development for MCPS employees. Refer to MCPS Regulation JCH-RA: *Reporting and Investigating Child Abuse and Neglect*.

**10. Does a therapist, private-duty nurse, or other counselor hired by parents need to have a criminal background check, including fingerprinting?**

No, the law applies only to contractors hired by MCPS. All service providers hired by parents must check in at the school's main office, be screened through the Visitor Management System (VMS) with their driver's license, and then be escorted throughout the building.

**11. Does the new law regarding criminal background check, including fingerprinting, apply to child-care providers operating in MCPS schools?**

Yes. Under Maryland law, child-care providers, just like school districts, must ensure that any individuals in their work force, as well as their contractors or subcontractors, are vetted with a criminal background check if they have direct, unsupervised, and uncontrolled access to children.

**12. Where do contractors get fingerprinted?**

Contractors can send their work force to the MCPS Office of Human Resources and Development (OHRD) to be fingerprinted. They should call and make an appointment with Mr. Gregory P. Jones, personnel assistant, OHRD, at 301-279-3276. There is a \$70 fee that covers the cost of fingerprinting and the identification badge.

Contractors can opt to use an MCPS-approved outside agency for fingerprinting. The list of approved agencies can be found on the Procurement Unit website at the following link:

*<http://www.montgomeryschoolsmd.org/departments/procurement>*

All fingerprinting documents must be sent to the director, Performance Evaluation and Compliance Unit, OHRD, 45 W. Gude Drive, Suite 2100, Rockville, Maryland 20850.

**13. Where do contractors access required training materials?**

In addition to fulfilling the criminal background screening requirements, contractors must certify to MCPS that training and/or informational materials on recognizing, reporting, and preventing child abuse and neglect are provided to each individual in its work force who will have direct, unsupervised, and uncontrolled access to students in an MCPS facility. These materials are available on the Procurement Unit website at:

*<http://www.montgomeryschoolsmd.org/departments/procurement>*

**14. How do contractors obtain identification badges?**

When contractors fulfill the criminal background screening and training requirements, they may obtain identification badges through the Department of School Safety and Security, Carver Educational Services Center, 850 Hungerford Drive, Room 131, Rockville, Maryland 20850. Appointments can be made by calling 301-279-3066.

**15. What happens if a contractor needs to complete an emergency repair and fingerprinting has not yet been completed?**

If a contractor needs to have access to a facility due to an emergency situation and has not been fingerprinted, an MCPS staff member must escort the contractor to the work site and remain with that contractor during the repair.

**16. If individuals in a contractor's work force already have been fingerprinted by MCPS, do they have to be fingerprinted again?**

No. Once the criminal background screening is completed, MCPS will follow up if it receives any reports of criminal activity issues that may raise concerns about an individual working in one of our facilities. The contractor will be notified and must take appropriate steps to promptly follow up on the information identified.

**17. Do these requirements apply to subcontractors?**

Yes. The requirements apply to all members of a contractor's work force, including subcontractors.

**18. Does MCPS require contractors to report suspected child abuse or neglect?**

Yes. While they are providing services to MCPS, all contractors are personally and directly required to report any suspected instance of abuse or neglect of a child or vulnerable adult following the procedures set forth in Montgomery County Board of Education Policy JHC, *Child Abuse and Neglect*, and MCPS Regulation JHC-RA, *Child Abuse and Neglect*, which are available on the MCPS website at <http://www.montgomeryschoolsmd.org/>. Additional legal obligations may apply. Any MCPS contractor, acting within his or her service capacity for MCPS, who suspects child abuse and/or neglect and knowingly fails to report it or who intentionally prevents or interferes with reporting, shall be subject to discipline up to and including discontinuation of services.

**19. Who should I contact if I have additional questions?**

MCPS Performance Evaluation and Compliance Unit, OHRD, 301-279-3361  
MCPS Department of Facilities Management, 240-314-1064  
MCPS Department of Materials Management, 301-279-3348  
MCPS Procurement Unit, 301-279-3555