

Investigations:

What Every School Administrator Needs to Know

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- Diversity and Inclusion in Employment Training
- Sexual Harassment Prevention and Anti-Discrimination Training in Employment
- Title IX Sexual Harassment Prevention Training
- Leave Issues: ADA, FMLA, Workers' Compensation, Paid Sick Leave
- The ADA/Connecticut Fair Employment Practices Act Interactive Process
- Employee Discipline and Teacher Non-Renewal and Termination
- "Dos and Don'ts" of Hiring, Including Background Checks, Public Act 16-67 and "Fair Chance" Legislation
- Social Media and the Workplace
- Workplace Investigations
- FERPA and Other Student Privacy Issues
- Special Education and Section 504
- Student Misconduct Investigations
- Anti-Bullying
- DCF Mandated Reporter Training
- Freedom of Information Act
- School Board Member Role and Responsibilities

- <https://www.pullcom.com/working-together>

The screenshot shows the Pullman & Comley website's blog section. At the top left is the firm's logo with the tagline "Pulling Together, Succeeding Together". A navigation menu includes "ABOUT", "LEGAL SERVICES", "TEAM", "INCLUSION", "NEWS & INSIGHTS", "BLOGS" (which is underlined), "CAREERS", and "CONTACT". A search icon is in the top right. The main header for the blog is "Working Together" with the subtitle "Developments in Labor and Employment Law Blog". Below this is a search bar with a "Search by Topic" dropdown, a "Keyword" input field, and a "SEARCH" button. The "Latest Posts" section features a post from 02.01.2023 titled "Disciplining Employees for Offensive Private Speech: Connecticut Employers Must Show Workplace Disruption" with a small image of a woman. On the right side, there is a list of links: "Connecticut Health Law", "Education Law Notes", "For What It May Be Worth", and "Working Together". Below these are "Home", "About Us", and "Contact Us" links. At the bottom right is a "Subscribe to Updates" button with a pencil icon.

<https://www.pullcom.com/education-law-notes>



BLOGS

Education Law Notes

Federal and Connecticut Developments in School Law Blog

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Latest Posts



01.09.2023

Title IX on the Nines



12.20.2022

Wins Scored for Transgender
Students and Athletes



12.13.2022

So How Much Time Do Public
Agencies Have to Respond to
Voluminous FOIA Requests?



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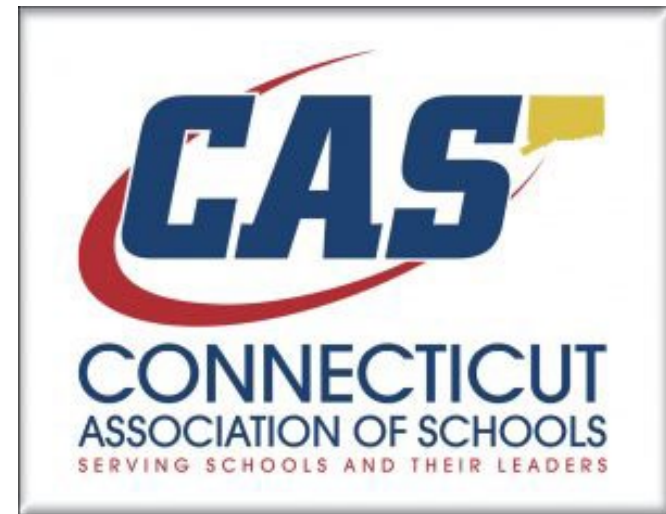


About Our School Law Blog

Alerts, commentary, and insights from the attorneys of Pullman & Comley's School Law practice on federal and Connecticut law as it pertains to educational institutions, whether those institutions be public school districts, private K-12 schools, or post-secondary colleges and universities.

- Upcoming seminars:
 - **April 4, 2023 – 8:30-10:30 AM:**
*“What Administrative Assistants
Need to Know About School
Law”* -- Via Zoom

 - **May 9, 2023 – 8:30-10:30 AM:**
*“What New/Aspiring
Administrators Need to Know
About School Law”* -- In-
Person



*"The facts, Ma'am.
Just the facts."*



- Initial Investigation Considerations
- The Legal Landscape
- Choosing an Investigator
- Planning the Investigation
- Witness Interviews
- The Investigation Report
- Post-Investigation Issues

- Why investigate????
 - To find the truth
 - To correct issues and prevent future misconduct
 - To comply with the law
 - To vindicate victims
 - To exonerate the falsely accused.
- Goals for investigations:
 - Prompt
 - Thorough
 - Objective

- Investigation maxims:
 - One size does not fit all.
 - Don't let the perfect be the enemy of the good.
 - If it's not in writing it doesn't exist.
 - No good deed goes unpunished.

Initial Investigation Considerations

Initial Investigation Considerations



- **The Who?**

- Who does your investigation involve?
 - Students?
 - Employees?
 - Third-parties (parents, vendors, etc.)?
 - All of the above?

- **The What?**

- What is the alleged or suspected conduct?
 - Suspected abuse/neglect – **REPORT IMMEDIATELY**
 - What Board policies are applicable or potentially applicable?
 - **MORE THAN ONE POLICY MAY BE APPLICABLE!**

- **The When?**

- When did the alleged conduct occur?
- When are the **investigation timelines** if any???

- **The Where?**

- Conduct occurring outside the school setting with no real nexus to the school environment may not be an appropriate issue for administrators to investigate.

- **The Why?**

- Is an investigation mandated pursuant to Board policy and/or the law?
 - Nondiscrimination/harassment
 - Title IX
 - Bullying/Safe School Climate

▪ The How?

- How will the investigation be conducted?
 - Who will be the designated investigator?
 - What Board policies/administrative regs need to be followed?
 - Will an investigation report be prepared? If so, who is the intended audience and what is the need for confidentiality?
 - Is a hearing or other administrative proceeding likely to follow after the investigation has concluded?

The Legal Landscape

- Investigations and the manner in which they are conducted can be mandated or governed by any number of state and federal laws that are often interconnect with one another:
 - Title IX of the Education Amendments Act of 1972 (“Title IX”);
 - Connecticut Anti-Bullying Laws, Conn. Gen. Stat. §10-222d, et seq.
 - Title VI of the Civil Rights Act of 1964 (“Title VI”);
 - Title VII of the Civil Rights Act of 1964 (“Title VII”);
 - The Family Educational Rights and Privacy Act (“FERPA”), 20 USC 1232g et seq.
 - The Connecticut Fair Employment Practices Act (“CFEPA”), Conn. Gen. Stat. §§46a-60 et seq.
 - The Teacher Negotiation Act (“TNA”), Conn. Gen. Stat. §§10-153a et seq.
 - The Municipal Employee Relations Act (“MERA”), Conn. Gen. Stat. §§7-467 et seq.
 - The Connecticut Freedom of Information Act (“FOIA”), Conn. Gen. Stat. §§1-200 et seq.
 - Connecticut Mandatory Abuse and Neglect Reporting statutes, Conn. Gen. Stat. §§17a-101 et seq.
 - Conn. Gen. Stat. §10-15c; and
 - The Connecticut and United States constitutions.

- An investigation can be triggered by warning signs such as observations of **inappropriate commentary or conduct**, general knowledge of **problematic behavior**, or **a request that inappropriate conduct cease**.
- In cases involving claims of harassment, such as that based upon gender, race, or other protected classes, there is a **responsibility to investigate even where** the alleged victim does not request or want the school to investigate.

Protected Classes Under the Law

race,
color,
religion,
age,
sex,
marital status,
family status
sexual orientation,
pregnancy,

national origin, ancestry,
present or past history of
mental disability,
intellectual disability,
learning disability,
physical disability,
gender identity or expression,
retaliation,
veteran status,
status as victim of domestic
violence.

- Prohibits discrimination on the basis of sex in schools receiving federal funds.
- Requires recipients to investigate complaints of sexual harassment pursuant to specified grievance procedures.
 - **Title IX Coordinator**
 - Employee who will coordinate the district's efforts to comply with its responsibilities under Title IX
 - **Investigator**
 - If possible, should not be the Title IX Coordinator
 - **Decision-maker**
 - Must not be the Title IX Coordinator or the Investigator
 - **Appeal Decision-maker**
 - Must not be the Title IX Coordinator, Investigator or Decision-maker

- Role of Investigator:
 - Gather and organize relevant evidence directly related to the allegations (both inculpatory and exculpatory).
 - District must ensure that “all relevant questions and evidence are admitted and considered (though varying weight or credibility may of course be given to particular evidence by the decision-maker).”
- Must provide equal opportunities to parties throughout investigation:
 - Must provide an equal opportunity for the parties to present witnesses (including fact and expert witnesses) and other inculpatory and exculpatory evidence.
- Discussing Allegations:
 - Cannot restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.
- Burden of proof and burden of gathering evidence is not on Complainant or Respondent.

- Requires safe school climate specialists to investigate or supervise the investigation of all reports of bullying and ensure that an investigation is completed promptly after receipt of any written reports.
- Various mandatory procedures must be followed during investigation process and in response to verified acts of bullying:
 - Parent notifications;
 - Student requests for anonymity;
 - Interim and post-verification support plans;
 - Reporting/coordination with Title IX Coordinator;
 - Record keeping requirements.

- School districts ***must permit and give priority to DCF*** (or law enforcement) in abuse or neglect investigations.
- Try to coordinate/minimize interviews of a child (DCF, police, school).
- Regardless of the outcome of any investigation by DCF or a law enforcement agency, the school district may take disciplinary action against any school employee up to and including termination of employment- based upon the district's investigation.

Contact HR/Legal if these issues are present:

▪ *Weingarten* Rights

- Upon demand, unionized employees have a right to union representation at an interview requested or demanded by the employer ***when the employee reasonably believes that the interview will result in a disciplinary action.***

▪ *Weingarten* is legally applicable only when the following elements are present:

- The interview in question is an ***investigatory*** interview;
- Employee ***reasonably believes*** interview will result in ***discipline***;
- ***Employee requests*** union representation;

- *Weingarten* only gives employees the right to **union representation** – it does not give employees the right to the union representative of **their choice**.
- Union representative can only participate to extent his or her participation does not interfere with employer's right to legitimately investigate:
 - No right to object to questions;
 - No right to advise employee not to answer.
- Union representative does not have to remain silent but cannot disrupt the meeting either.

The *Garrity* Rule

Contact HR/Legal if these issues are present:

- **Garrity Warning:**

- An employee may be compelled to respond to questions about the performance of his duties if he is given notice that his answers will not be used against him in a subsequent criminal matter regarding the same conduct.
- As long as an employee is not compelled to waive his privilege against self-incrimination by the threat of using his statement against him in a subsequent **criminal** proceeding, a public entity is permitted to discipline or even dismiss an employee upon his refusal to answer the questions relating to performance of his official duties.



New Jersey v. TLO (1985)

- Students do not shed their constitutional rights at the schoolhouse gate.
- Unlike the requirement for police officers that they have “probable cause” to search someone, the search of a student at school is required to be “reasonable.”
- The search must be reasonable at its inception.
- The search must be reasonable in scope to the circumstances that started the search.

Consider when searching:

- Cell phones;
- Lockers;
- Backpacks and **portions** of backpacks;
- Pockets, shoes, hoods; and
- Items found in “plain view” are typically not “searched,” barring unusual circumstances.

NOTE: You do not have to wait for parents to conduct searches if you have reasonable suspicion that the search may yield evidence of wrongdoing.

- Consider same-sex adults searching for contraband, along with another administrator.
- Avoid strip-searches except in the most exigent circumstances.

- Do **not search** employees or employee property on school grounds.
- **District property** may be subject to search:
 - District files;
 - District-owned equipment
 - Cell-phones
 - Email accounts
- Key question – Does employee have a reasonable expectation of privacy in area to be searched?
- NOTE – Conn. Gen. Stat. § 31-48d restricts the ability of Connecticut employers to electronically monitor employees without notice

- Investigation records that are not otherwise exempt from FOIA are subject to disclosure upon request.

- Possible exemptions:
 - Preliminary drafts or notes
 - Personnel or medical files the disclosure of which would constitute an invasion of privacy
 - Collective bargaining records
 - DCF records
 - Records of teacher performance and evaluation
 - Attorney-client privileged records
 - FERPA-protected records

- FERPA prohibits the disclosure of personally identifiable information from a student's education record without prior consent except in limited circumstances:
 - **“Personally identifiable information”** – includes:
 - “Information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.”
 - “Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.”
 - **“Education records”** – include records directly relating to a student that are maintained by the educational institution.
 - Records kept in sole possession of the maker and not disclosed or accessible to others are not education records.
- Key exemptions to prior consent requirement:
 - Directory information
 - Disclosure to other school officials with legitimate educational interest
 - Health or safety emergency

Choosing an Investigator

Choosing an Investigator

- A good choice:



Choosing an Investigator

- Maybe not so good....



- In choosing an investigator, consider that the investigator later may be called as a witness. Possible choices:
 - Building administrator
 - Safe School Climate Specialist
 - Central office administrator
 - Title IX Coordinator
 - Director of Human Resources
 - Private investigator or other outside consultant
 - Regular outside counsel
 - Special outside counsel.
- In employment matters, investigator should not be member of same bargaining-unit as accused.

- Important criteria in selecting an investigator include:
 - **Ability to understand** the investigation’s purpose
 - **Knowledge** of your existing policies, procedures, practices, rules, collective bargaining agreements, and handbooks (training is at least a “plus”, if not required)
 - **Effectiveness** as an interviewer in view of the personalities, ages and backgrounds of the potential interviewees

- If it is possible or desirable to cover the investigation by the **attorney-client privilege** or the **attorney-client work-product doctrine**, the investigator should be an attorney or one acting at the direction of an attorney.

Other attributes to consider in choosing an investigator include:

- **Credibility**
- **Discretion** -- ability to maintain confidentiality
- **Rapport** with, and ability to elicit information from, the complainant and witnesses.

Avoiding Conflicts of Interest/Bias Issues

- Investigators should be fair and impartial.
- Potential conflicts of interest:
 - Direct involvement in the matter – i.e. direct witness
 - Pre-existing relationships with the parties and/or witnesses
 - A out-of-school friendship with the parent of an accused student
 - Serving as an alleged victim’s coach on a sports team
 - Wearing too many “hats” in the process:
 - Title IX Coordinator also serving as Title IX Investigator
 - Investigating a superior
 - Investigating a direct report

Avoiding Conflicts of Interest/Bias Issues

- Things that are **not** automatic conflicts of interest
 - Just because you know the student/employee does not mean there is a conflict of interest
 - Just because you have disciplined the student/employee in the past does not equate to a conflict of interest
 - Just because you evaluate the employee does not mean there is a conflict of interest
 - Just because you have some prior knowledge of the incident or issue does not mean there is a conflict of interest.

Planning the Investigation

- The complaint is the roadmap for investigation.
- If applicable, reduce complaint to writing in accordance with applicable policies.
- Before interviewing *anyone* else, make sure that complainant has been adequately interviewed and you know what the claims are.
- Ensure that complainant/alleged victim is asked to provide all relevant corroborating evidence and witnesses.

Initial Steps: Securing Evidence and Cooperation

- Take immediate action to deal with any potential safety concerns:
 - Notifying police/SRO as necessary;
 - Weapons, drugs, threats of violence, etc.

- Determine if any interim measures are needed pending the investigation:
 - Should an accused staff member be placed on administrative leave?
 - Should supportive measures be provided to students?

- Non-disciplinary, non-punitive individualized services offered without fee or charge to the complainant/alleged victim or the respondent/alleged perpetrator before or after the filing of a formal complaint or where no formal complaint has been filed.
 - Such measures are designed to restore or preserve equal access to the education program or activity without unreasonably burdening the other party,
 - Includes measures designed to protect the safety of all parties or the district's educational environment or to deter sexual harassment.

- Change in class schedule
- Additional time to make up missed assignments due to the alleged harassment
- Ability to retake assignments/tests that were impacted by the harassment
- Ability to withdraw from elective classes without penalty
- Separating the parties as much as possible during the school day
- Providing support by the guidance counselor, social worker or other
- Increased monitoring, supervision, security.

Initial Steps: Securing Evidence and Cooperation

- Make copies of documentary “evidence.”
- Take pictures if possible – **BUT DO NOT TAKE OR TRANSMIT SEXUALLY EXPLICIT IMAGES OF MINORS.**
 - Drugs, paraphernalia, lighters, etc...;
 - Weapons (place up against rulers);
 - Injuries;
 - Property damage;
 - Text messages, social media.
- Confiscate contraband and evidence. Possibly necessary to give to police.
- Notify the police/DCF as appropriate.

Initial Steps: Securing Evidence and Cooperation

- Confidentiality guarantees: pros and cons. Don't make promises that you cannot keep (in light of potential future legal proceedings). However, at least maintain discretion.
- Non-retaliation guarantee/protection – to be given to all witnesses and parties.
- Physical evidence: secure before too late and handle in accordance with policies/law (especially if contraband), particularly in digital and social media age. **Remember:** “Search and seizure” issues.



- Identify and review applicable policies
- Secure and collect key documents and other evidence
- Develop preliminary outline
- Identify needed witnesses and determine the planned order of interviews
- Draft interview questions
- Coordinate interview logistics

Witness Interviews

- Review all relevant documentation.
- Determine order of interviews.
 - Most investigations start with interview of complainant/alleged victim and end with accused perpetrator.
- Where and when will interviews be conducted?
 - Is interview location private?
 - Will potential witnesses be able to see other witnesses walking in and out of interview room?
 - Phone interviews for some witnesses?

- Who will participate and how will they participate?
 - More than one investigator?
 - Designated note-taker?
 - Parent attendance permitted?
 - Union representative attendance?
- Draft questions/outline topics that should be addressed.



- Introduce yourself and explain your role.
- Advise interviewee that you will be taking notes and/or recording.
- **DO NOT PROMISE CONFIDENTIALITY** – Advise interviewees that information will be shared on a need-to-know basis.
- Ask interviewee if they have any questions or concerns before you get started.

- Build a rapport with the witness – do not interrogate!
- Be neutral in tone and approach – pretend you’re a newspaper reporter – who, what, where, why, when and how...
- Use your interview “script” but let the conversation evolve naturally.
- Use open-ended questions rather than leading ones.
- Avoid compound questions.
- Use the “funnel” approach.
- Develop a timeline/chronology and use it to help guide the interview.

- Don't end the interview before asking the tough questions you need to ask. Usually best to save such questions until the end to preserve rapport with witness.
- Ask interviewee if there is anything they want you to know.
- Advise interviewee that you may need to follow-up with them down the road.

- Most formal investigations start with an interview of the alleged victim.
- Possible questions/topics:
 1. What occurred?
 2. Review/clarify written complaint? Is the complaint complete?
 3. Are there any other students, teachers or staff who may have relevant information?
 4. Do you have any notes, emails, text messages, WhatsApp messages, SnapChats, or any other relevant physical evidence?
 5. How has the incident/issue affected you at school?
- Be very careful not to suggest answers.

- Possible questions:

1. What did you observe/see/hear?
2. Relationship with the parties?
3. What, if anything, did the Complainant tell you about the incident?
4. Describe the Respondent's behavior toward the Complainant?
5. Are you aware of the Respondent doing anything similar in the past?
6. Do you know of anyone else who may have relevant information?

- Typically, the last interview depending on what is revealed during the interview.
- Two goals:
 1. Give accused chance to respond to accusations;
 2. Gather information from accused's perspective.



- Explain the seriousness of the investigation.
- Explain the importance of accurate information and the individual's obligation to provide truthful, thorough information.
- Caution that the failure to cooperate, the provision of false information, or the subsequent disclosure of confidential information by discussing it with others can be causes for disciplinary action.
- If a union employee requests representation and has a reasonable belief that the interview may result in disciplinary action, ***do not proceed without a union representative.***

- Should an employee be unwilling to cooperate with the investigation and refuse to answer questions, this lack of cooperation may be viewed as an act of **insubordination and a basis for further punishment**, i.e., reprimand, suspension or dismissal.
- If the “accused” refuses to participate, the interviewee should be told that the employer will base its decision on the other information gathered during the investigation, the inferences drawn from that evidence and the “accused’s” unwillingness to cooperate in the interview.

- Write legibly (or type).
- Identify date, time and everyone present for the interview.
- Indicate that you reviewed preliminary issues, confidentiality concerns, etc.
- Note key facts.
- Where possible write verbatim answers to key questions – ask interviewee to repeat answer if necessary.
- Consider typing handwritten notes following interview for clear record.

- Should **parents** be permitted to attend interview? A case-by-case analysis.
 - Does applicable policy/law expressly permit it (i.e. Title IX advisors)?
 - Age of child/nature of investigation
 - Promptness concerns
- Should witness be asked/required to fill-out **statements**?
 - Generally, a good idea especially for potential student disciplinary matters
 - Witnesses can be provided notes and asked if it accurately captures discussion
- Should interviews be **recorded**?
 - Pro – there is a recorded record.
 - Con – there is a recorded record.
 - Connecticut is a “one party consent” recording state but it is not a good idea to record investigation interviews without witness (and union or parent) consent.

- Evaluate the whole person – their demeanor, body language and non-verbal cues.
- Consider specific versus vague answers.
- Look for any evidence of motive/bias/interest, even where not immediately apparent.
- Listen for “ring of truth” answers.
- Consider timing of incident, witness proximity, state of mind at the time, etc.
- Use your own experience as a person and administrator to evaluate the situation.

The Investigation Report

- One size does not fit all. Art not science.
- Reports should be:
 - “Newspaper-style”
 - Neutral in tone
 - Clearly written
 - Comprehensive, but not overly-detailed
 - A document that can be used for subsequent action.
- An investigation report is distinct from the investigation “file.”
- Be very conscious of what will be attached to the investigation report.
- Take appropriate steps to redact confidential information.

Sample Investigation Report Outline

- I. Allegation/Incident Investigated**
- II. Executive Summary**
- III. Overview of Investigative Process**
- IV. Summary of Investigation Interviews**
- V. Documentary and Other Evidence Reviewed**
- VI. Identification of Relevant Board Policies and/or Work Rules/Student Code of Conduct**
- VII. Factual Findings**
- VIII. Conclusions**

I. Allegation/Incident Investigated

- The guideposts for your investigation.
- The report should clearly identify in neutral language the allegation or allegations that were the subject of the investigation.
- If multiple allegations or incidents were investigated list them out separately.
- If new allegations or areas of concern arise during the investigation process it may be necessary to initiate a separate investigation.

II. Executive Summary

- A short-form summary of the investigation.
- The reader should be able to read the executive summary and understand the nature of the allegation, the efforts the District took to investigate and the ultimate factual findings of the investigation.
- Facts set out in the executive summary should be described in more detail in the body of the report.

III. Overview of Investigation Process

- A chronology of the steps and efforts taken to investigate the matter.
- A reader should be able to clearly understand the steps the investigator took to investigate the matter.
- Commences with initial complaint/reported incident and when the investigator was assigned to investigate the matter.
- Generally, includes:
 - Dates of witness interviews including who attended (i.e. union stewards, parents, etc.);
 - Dates of document requests/receipt of relevant documentation;
 - Dates when videos were reviewed, site visits conducted, etc.

IV. Summary of Investigation Interviews

- A summary of key facts elicited from each witness interview.
- Should not be a verbatim “transcript” of each interview.
- More detailed interview notes should generally be kept in the investigation file that is separate from the report.
 - **REMEMBER** – the investigation report may need to be produced at a later date so consider what should be attached to report.

V. Documentary and Other Evidence Reviewed

- List of evidence collected and/or reviewed with a brief description as necessary for each item.
- Examples:
 - Copies of text messages and voicemail messages
 - Copies of phone bills
 - Posts on social media
 - Seating charts/attendance records
 - Police reports
 - Photographs, video recordings, video surveillance
 - Diaries/journals
- Generally, an employee's personnel file or student's prior discipline file is not relevant for purposes of an investigation and would not be reviewed by the investigator. Such files may be relevant for the ultimate decision-maker.

VI. Identification of Relevant Board Policies and/or Work Rules/Student Code of Conduct

- A reference point for the decision-maker.
- List as appropriate.
- Collect and review at the outset of investigation.

VII. Factual Findings

- The most important piece of any report.
- Can be a narrative summary or numbered paragraphs.
- Each relevant fact should be listed separately, and the investigator should be able to identify the source of evidence that supports each relevant fact.
- If a particular factual issue is in dispute, it is up to the investigator to decide what the factual conclusion should be.

- The report's conclusions should tie back to the initial allegation and or incident being investigated without editorializing or recommending future action.
 - **NOTE:** Including a conclusion section in an investigation report may increase the likelihood that the report is not a “preliminary draft or note” pursuant to the FOIA.

- Should a “Recommendation” section be included?
 - What if your recommendation conflicts with another administrator's?
 - Maybe required by policy

Post-Investigation Issues

Who is Entitled to Investigation Records?

- Parents?
 - ***Smith v. Superintendent, Middletown Public Schools***, #FIC 2013-333 (January 30, 2014): District’s refusal to produce bullying investigation report to alleged victim’s parent upheld where parent knew the identities of students who were alleged bullies.
 - Disclosure of report – even in redacted form – would result in disclosure of personally identifiable information regarding alleged bullies.
 - District provided summary of report to parent who made request.
- Staff members?
 - General right to investigation records in connection with disciplinary proceedings.
- The “public”?
 - FOIA controls.

- Investigation records/documents should generally not be kept in personnel or student files
 - Exception for letters regarding ultimate disposition (i.e. suspension, etc.)
- An investigation record and the fact that an investigation occurred is not “discipline” for purposes of progressive discipline
- Consider records retention requirements before destroying investigation records. Many investigation records must be preserved for at least five years.

- Maintaining separation between parties in the schools?
- Discipline
- What if you cannot substantiate? Is that the end? NO
- Taking precautionary measures if questions as to substantiation
- Restorative practices
- Other

Contact Information



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