



September 26, 2024

Yaw Gyebi, Director
Kimberly Cruz, Regional Attorney
New York District Office
33 Whitehall St., 5th Floor
New York, NY 10004

Re: Investigation Request/ Rochester City School District

Dear Director Gyebi and Attorney Cruz:

Under 29 C.F.R. §1601.6(a), Parents Defending Education (PDE) files this request to investigate Rochester City School District in Rochester, New York for employment discrimination on the basis of race, color, religion, sex, or national origin in violation of Title VII of the 1964 Civil Rights Act, 42 U.S.C. §2000e *et seq.*¹

PDE makes this investigation request as an interested third-party organization with members who are parents of school children throughout the country. PDE and its members oppose racial discrimination and political indoctrination in America's schools. Rochester City School District has updated its equity policy to implement quotas for hiring diverse educators and staff. This equity policy promotes race-based hiring and educator retention in the District. Attached to this complaint is supporting evidence in the form of a presentation titled, "Staff Diversity & Staffing Update: Building a workforce our students need" (Exhibit A), which outlines the District's strategic goals for hiring and retaining a diverse staff and "REAL-Racial Equity Action Plan" (Exhibit B), which outlines the District's Racial Equity Advocacy Leadership Team Vision Statement.

Exhibit A reveals that a primary purpose of the "Staff Diversity & Staffing Update" plan was to "[r]ecruit, develop, support and retain the most effective diverse staff" (Ex. A at 2). This resource underpins data points about the lack of diversity in education as a reason for expanding diversity of the workforce. According to the presentation, two main reasons to expand diversity in the workforce are "students of color benefit from seeing teachers that look like them" and "all students benefit by being taught by teachers from a variety of different backgrounds, races, and ethnic groups" (Ex. A at 5).

The presentation points to the discrepancy between students of color (86%) and teachers of color (25%) (Ex. A at 6). While the "Staff Diversity & Staffing Update" credits Rochester City School District for being 6% higher than the national average of the "Teachers of Color" category, it cites "systemic barriers" that "prevent[s it] from recruiting, retaining and developing a high

¹ Copies of this letter are also addressed to each member of the Commission, and Parents Defending Education makes the same request of them under 29 C.F.R. §1601.6(a).



quality and diverse teaching force” (Ex. A at 36). One main reason the presentation cites is “School and District culture gaps, lack of consistent retention strategy” (Ex. A at 36).

Goals of the teacher recruitment process laid out by the presentation include: “[i]ncrease number of teachers of color and who are bilingual” and “[p]rovide assistance to cover some tuition costs in exchange for commitment to work in RCSD—partner with multiple colleges to pipeline to RCSD” (Ex. A at 38).

Another strategy for recruitment is to target HBCU, by training recruitment ambassadors with the goal to “[r]epresent RCSD at recruitment events locally, regionally, nationally” and “[d]evelop and implement a race and class consciousness rubric for recruitment to ensure we build a workforce our students need” (Ex. A at 41).

Although the District’s equity vision statement is “RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all,” the District recruitment and hiring process ensures “staffing of the RCSD will reflect the racial composition of the student population” (Ex. B at 1). That is, to be “anti-racist,” the District suggests it must discriminate based on race in staffing decisions.

The District plans to “[r]ecruit and retain significantly greater numbers of qualified, appropriately credentialed, underrepresented race and class-conscious staff of color: African American, Hispanic, Asian, and Native American” and “[i]mplement systemic, equitable hiring practices” (Ex. B at 1).

In addition, to setting a “10 percent year-over-year improvement in number of Staff of color hired” (Ex. B at 1), the District will also “[u]se characteristics of race and class-conscious teachers as recruitment tool to attract mission-driven teachers” (Ex. B at 2).

Therefore, the Rochester City School District’s imposed hiring and recruitment process underscore that not all candidates are weighed the same through the hiring process—and that this exclusion would be based on an individual’s race.

As the Commission is aware, “the important purpose of Title VII” is “that the workplace be an environment free of discrimination, where race is not a barrier to opportunity.” *Ricci v. DeStefano*, 557 U.S. 557, 580 (2009). Specifically, Title VII declares that it is an “unlawful employment practice” (1) “to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual’s [protected characteristic]”; or (2) “to limit, segregate, or classify his employees or applicants for employment in any way which would ... adversely affect his status as an employee, because of such individual’s [protected characteristic].” 42 U.S.C. §2000e-2(a). Title VII “prohibits even making a protected characteristic a ‘motivating factor’ in an employment decision.” *EEOC v. Abercrombie & Fitch Stores, Inc.*, 575 U.S. 768, 773 (2015) (quoting 42 U.S.C. §2000e-2(m)). But here, Rochester City School District appears to be intentionally discriminating against its employees because of their race by making race a barrier to opportunity.



Rochester City School District cannot discriminate based on race for employment decisions. We ask that your office promptly investigate the allegations in this complaint, act swiftly to remedy unlawful policies and practices, and order appropriate relief.

Thank you for your prompt assistance with this request for investigation and resolution.

Please contact me for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Caroline Moore".

Caroline Moore
Vice President
Parents Defending Education

Enc. Exhibits A-B

Cc: The Honorable Charlotte A. Burrows, Commission Chair
The Honorable Jocelyn Samuels, Commission Vice Chair
The Honorable Keith E. Sonderling, Commissioner
The Honorable Andrea R. Lucas, Commissioner
The Honorable Kalpana Kotagal, Commissioner



Exhibit A



Rochester City School District

Staff Diversity & Staffing Update:

Building a workforce our students need

November 15, 2022

Christopher Miller, Ed.D.



RCSD
Human
Capital



Rochester City School District

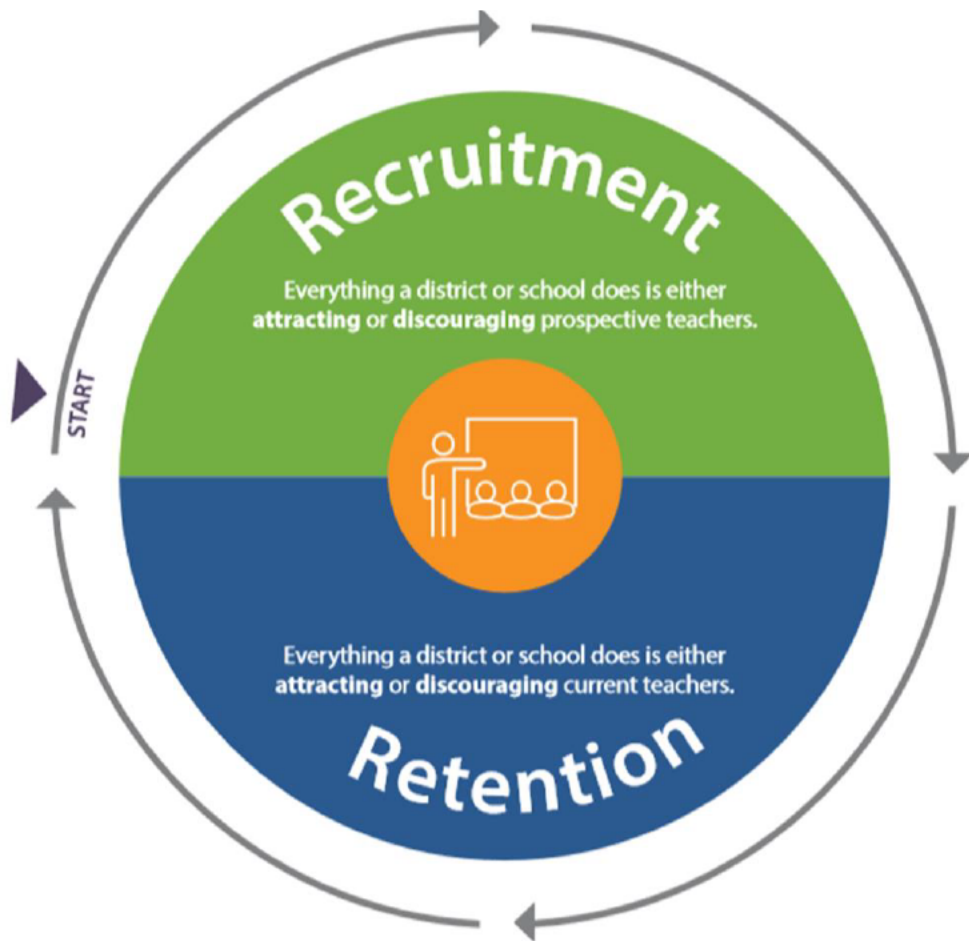
**WHO WE ARE.
WHAT WE DO.**

HUMAN CAPITAL

**Recruit, develop, support, and retain
the most effective diverse staff.**

Agenda

1. **Staff Diversity Data**
2. **New Hire Data**
3. **Vacancy Update**
4. **Recruitment Initiatives**
5. **Priorities & Future Needs**



The need for greater diversity in the classroom



- More than 40% of public schools in the U.S. lack a single teacher of color on staff.
- Males of color comprise just 2 percent of the teaching force in the U.S.
- **Research shows students of color benefit from seeing teachers that look like them.**
- **All students benefit from being taught by teachers from a variety of different backgrounds, races, and ethnic groups.**



In the RCSD, students of color represent 86% of the student population, just 25% of teachers are teachers of color.



86%

Students of Color

vs.



25%

Teachers of color



Comparative Teacher Diversity Data

District	Teachers of Color
Buffalo Public Schools	15%
Rochester City School District	25%
Syracuse City School District	24%
Nationally	19%*

**Source: National Center for Education Statistics*

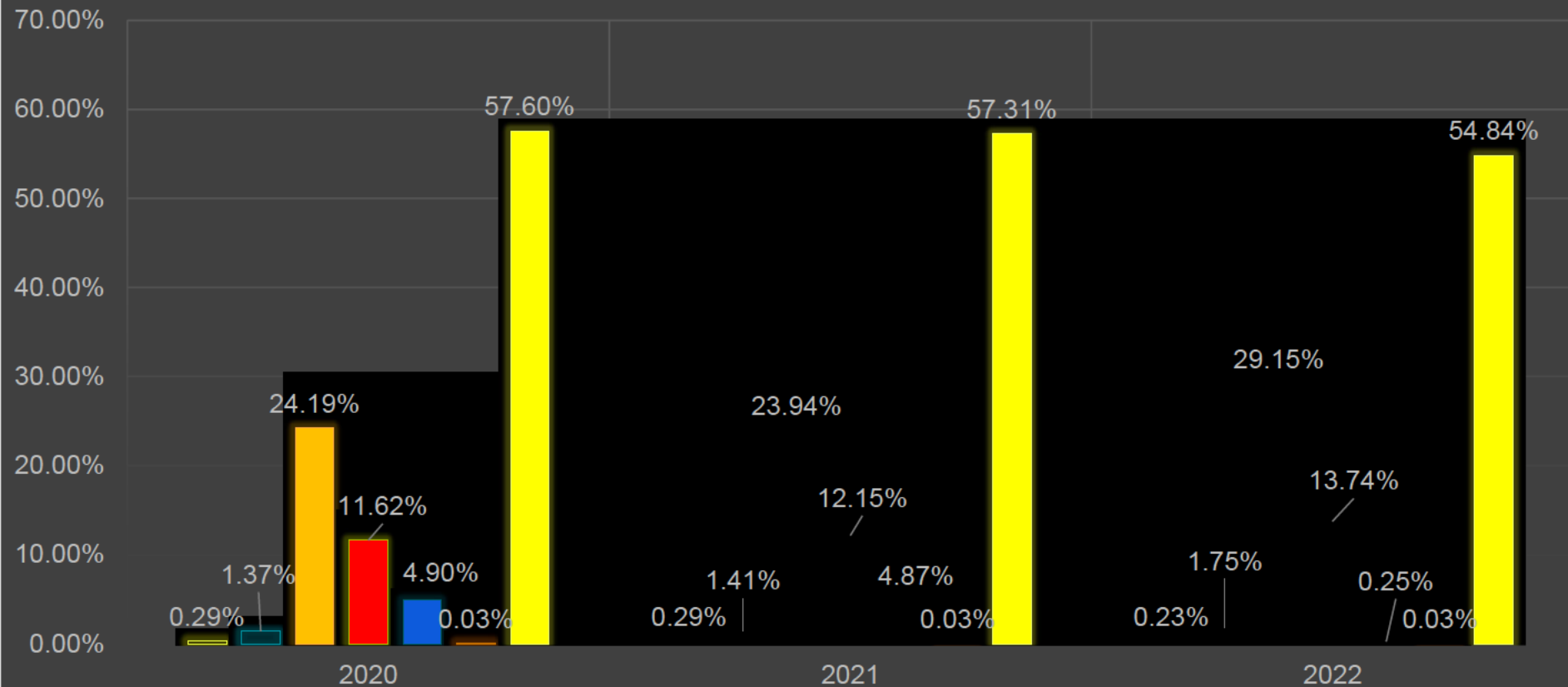
Definitions

Data provided on the subsequent slides are from October 2022, with prior years for comparison.

- **All Staff:** All RCSD staff, full-time, part-time, substitute
- **RTA:** Rochester Teachers Association
- **ASAR:** Association of Supervisors & Administrators of Rochester
- **BENTE:** Board of Education Non-Teaching Employees
- **RAP:** Rochester Association of Paraprofessionals

Percent of All Staff by Race, n= 6,576, 5,940, 6,440

AmIndian Asian Black Hispanic Not Spec Pacific White



New Hire Data—All Staff, since July 1, 2022

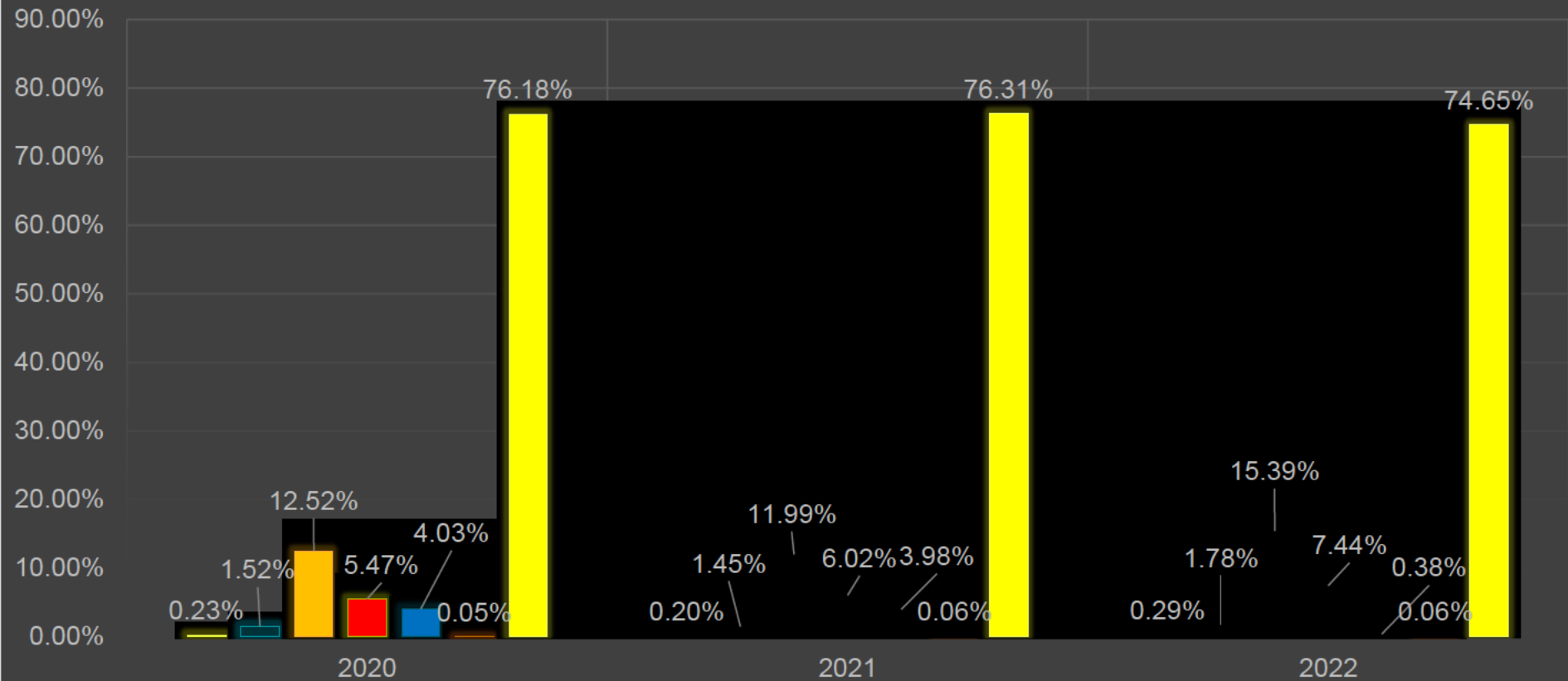
	Male	Female	Total
American Indian	0	2	2 (0.3%)
Asian	5	16	21 (3%)
Black	84	174	258 (36%)
Hispanic	30	82	112 (16%)
Native Spec	1	12	13 (2%)
Pacific	0	0	0
White	92	213	305 (43%)
Total	212 (30%)	499 (70%)	711 (100%)
Total POC	120 (57%)	286 (57%)	406 (57%)

New Hire Data—All Staff, since July 1, 2022

All Staff	Percent
Rate of People of Color	45%
Hiring Rate	57%
Difference	12% points

Percent of RTA by Race, n= 3,947, 3,521, 3,144

AmIndian Asian Black Hispanic Not Spec Pacific White



New Hire Data—RTA, since July 1, 2022

	Male	Female	Total
AmlIndian	0	2	2 (.05%)
Asian	4	9	13 (3%)
Black	20	70	90 (23%)
Hispanic	9	29	38 (10%)
NSpec	1	9	10 (3%)
Pacific	0	0	0
White	72	159	231 (60%)
Total	106 (28%)	278 (72%)	384 (100%)
Total POC	34 (32%)	119 (43%)	153 (40%)

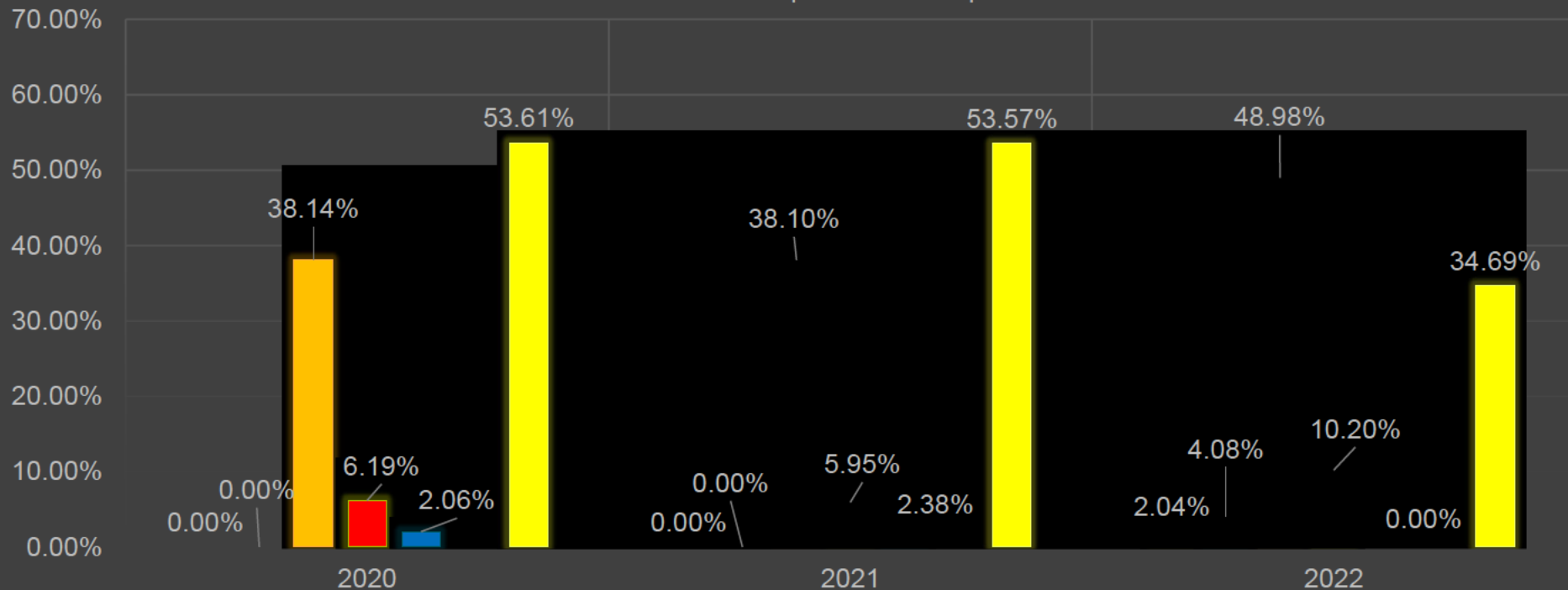


New Hire Data—RTA, since July 1, 2022

RTA	Percent
Rate of People of Color	25%
Hiring Rate	40%
Difference	15% points

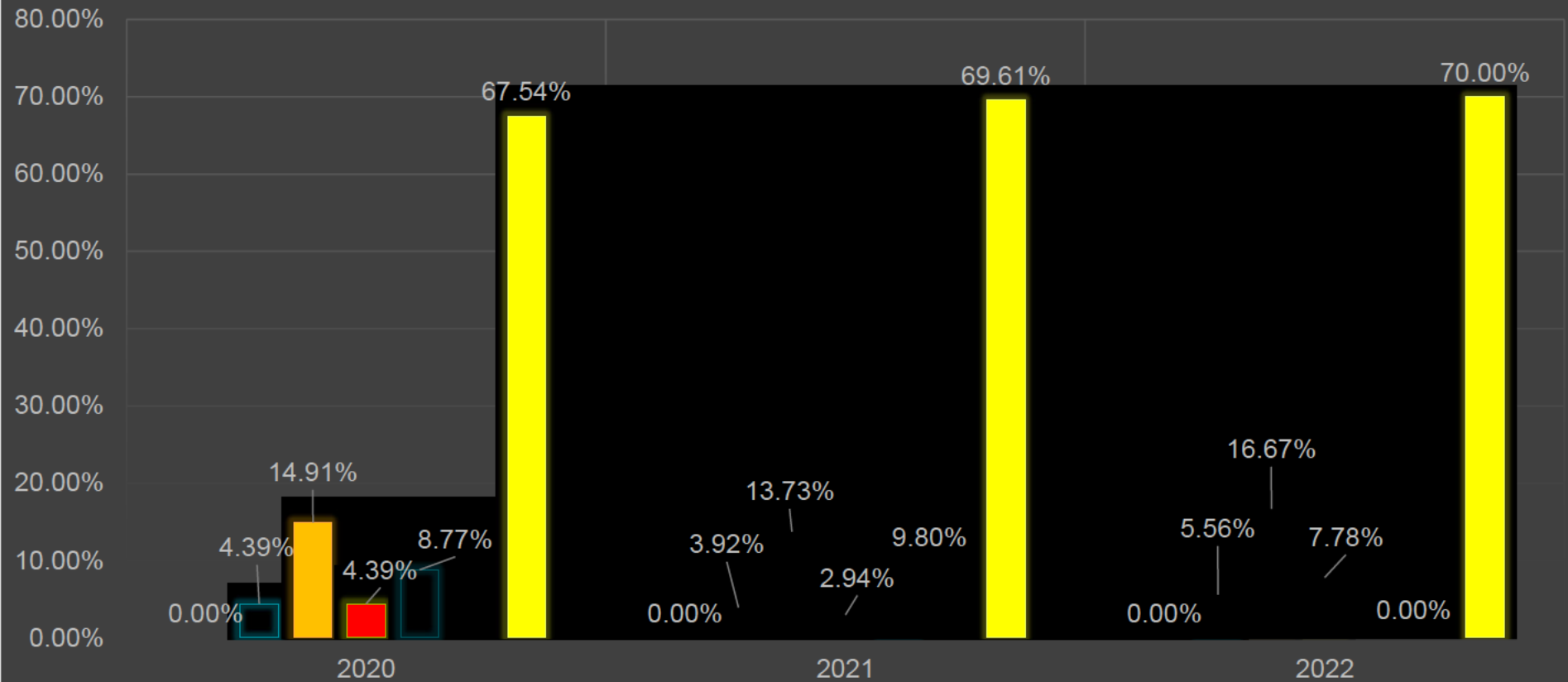
Percent of Principals by Race, n= 52, 49, 49

AmIndian Asian Black Hispanic Not Spec Pacific White



Percent of ASAR Civil Service by Race, n= 114, 102, 90

AmIndian Asian Black Hispanic Not Spec Pacific White



New Hire Data—ASAR, since July 1, 2022

	Male	Female	Total
Amlndian	0	0	0
Asian	0	0	0
Black	3	11	14 (26%)
Hispanic	2	6	8 (15%)
NSpec	0	0	0
Pacific	0	0	0
White	9	22	31 (58%)
Total	14 (26%)	39 (74%)	53 (100%)
Total POC	5 (36%)	17 (44%)	22 (42%)

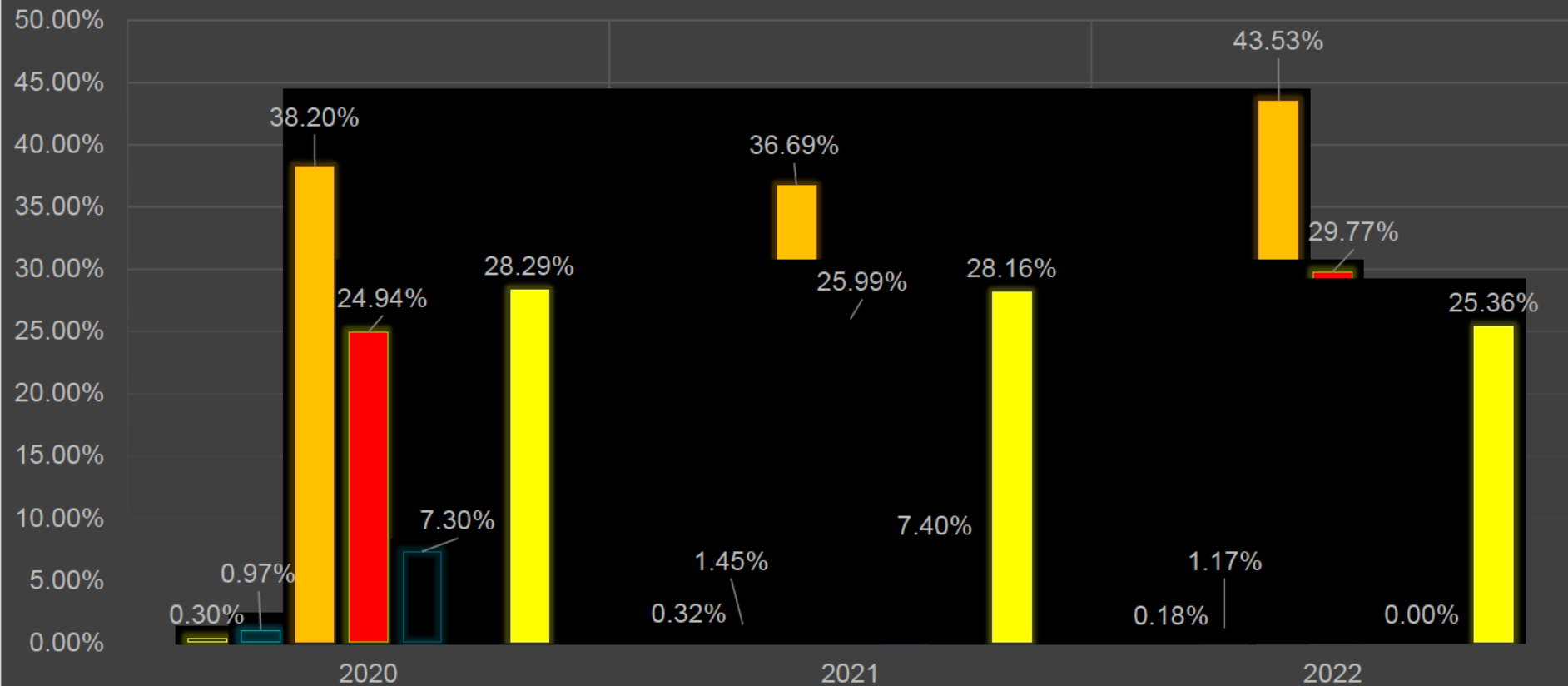


New Hire Data—ASAR, since July 1, 2022

ASAR	Percent
Rate of People of Color	38%
Hiring Rate	42%
Difference	4% points

Percent of BENTE by Race, n= 1,343, 1,243, 1,112

AmIndian Asian Black Hispanic Not Spec Pacific White



New Hire Data—BENTE, since July 1, 2022

	Male	Female	Total
Amlndian	0	0	0
Asian	1	1	2 (2%)
Black	32	26	58 (54%)
Hispanic	14	17	31 (29%)
NSpec	0	1	1 (1%)
Pacific	0	0	0
White	6	9	15 (14%)
Total	53 (50%)	54 (50%)	107 (100%)
Total POC	47 (89%)	45 (83%)	92 (86%)

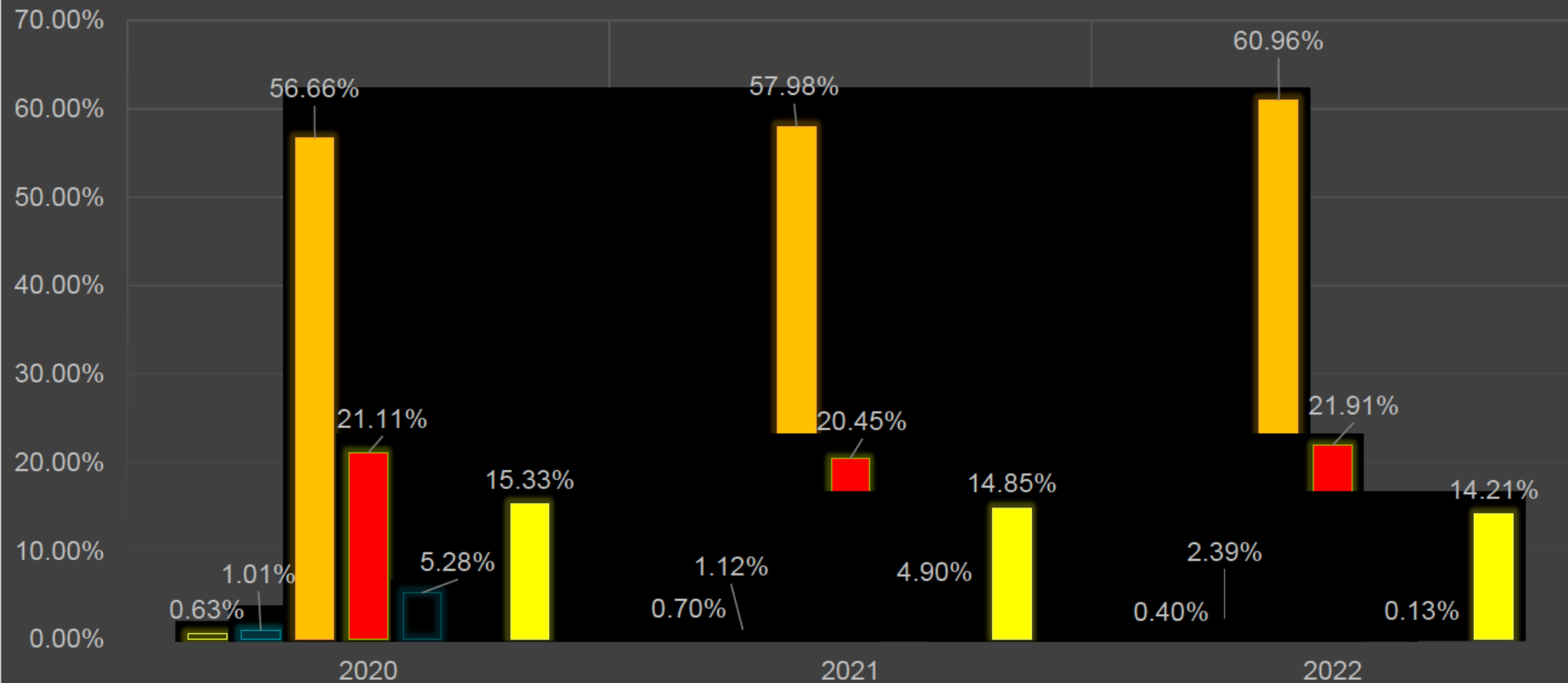


New Hire Data—BENTE, since July 1, 2022

BENTE	Percent
Rate of People of Color	74%
Hiring Rate	86%
Difference	12% points

Percent of RAP by Race, n= 796, 714, 753

AmIndian Asian Black Hispanic Not Spec Pacific White



New Hire Data—RAP, since July 1, 2022

	Male	Female	Total
Amlndian	0	0	0
Asian	0	3	3 (3%)
Black	13	45	58 (60%)
Hispanic	4	21	25 (26%)
NSpec	0	1	1 (1%)
Pacific	0	0	0
White	0	9	9 (9%)
Total	17 (18%)	79 (82%)	96 (100%)
Total POC	17 (100%)	70 (89%)	87 (91%)



New Hire Data—RAP, since July 1, 2022

RAP	Percent
Rate of People of Color	85%
Hiring Rate	91%
Difference	6% points

Human Capital Staff Diversity Data, current

	Male	Female	Total
AmlIndian	0	0	0
Asian	0	2	2 (7%)
Black	2	8	10 (36%)
Hispanic	0	6	6 (21%)
Pacific	0	0	0
White	1	9	10 (36%)
Total	3 (11%)	25 (89%)	28 (100%)
Total POC	2 (11%)	16 (89%)	18 (64%)

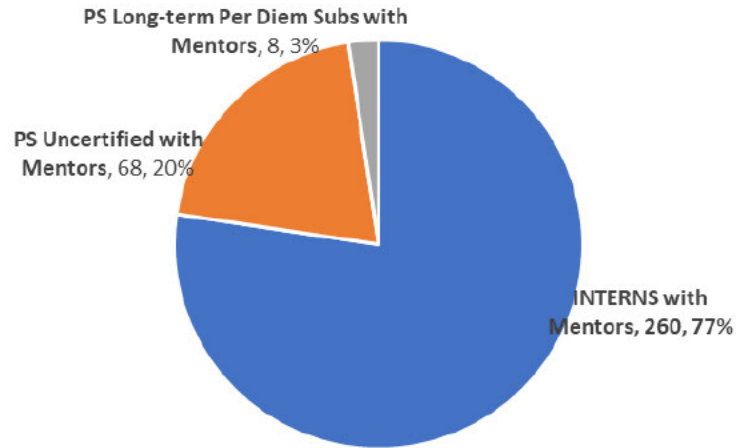


New Teacher Certification Update

- Hired **363** new teachers to start the 2022-2023 school year.
- Of these, **228 or 63%** were fully certified, in their position, to start.
- **18** were certified in another content area.
- **107** were not fully certified in their position to start.
 - **4** have since received certification
 - **6** have applications under NYSED review
 - **97** engaging in Teacher Certification Actions Plans (T-CAPs)

New Teacher Mentoring

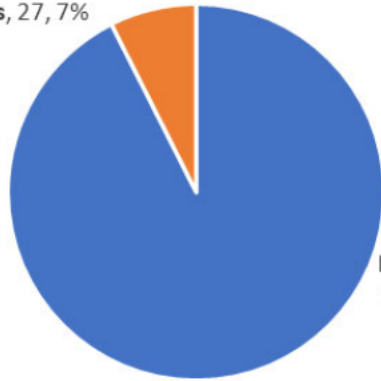
NEW Teachers & Service Providers With Mentor Support (as of 11/2/22)



New Teacher Mentoring

CIT New Teacher and Service Provider
Mentor Assignments

NEW TEACHERS without
Mentors, 27, 7%



NEW TEACHERS
with Mentors,
336, 93%

Tenure Area of Unassigned

Counselor	5
CTE-Culinary	1
Elem K-6	6
ESOL	3
For Lang	2
Health	1
Library Med Spec	0
Math	1
Science	2
Social Worker	5
Technology	1



New Teacher Mentoring

CIT Actions to Address Mentoring Shortfall

1. Filling/Shifting Mentor Caseloads
2. Recruitment of New Mentors in high need areas
3. CIT Governing Panel Interviews of new mentor candidates: 5 New Mentors selected
4. Recruitment of Former Mentors in high need areas: 9 former Mentors returned to serve
5. Recruitment of recently retired CIT Mentors: 1 accepted, 1 delayed (but hopefully soon)
6. Utilizing existing Central Office and School TOAs to provide support while CIT Mentor support is arranged



Staff Vacancies (as of 10/28/2022)

Operations	10/28 FTE Vacant
Facilities/Custodial	17.50
Food Service	19.20
Transportation	10.84
Safety & Security	4.00
TOTAL	51.54

Schools	10/28 FTE Vacant
Classroom Teachers	48.13
Non-Classroom Teachers	2.10
Paraprofessionals & Teaching Assistants	23.17
Clerical	8.80
TOTAL	82.20

Teacher Vacancies, 10/28/22

Vacant Position	FTE
Social Worker Bilingual	1.00
Auto Mechanics	0.20
Elementary Bilingual	6.00
Elementary	2.00
ESOL	8.26
Family Consumer Sci.	0.70
Foreign Language	5.00

Vacant Position	FTE
Mathematics	4.50
Music	0.10
Pre-Kindergarten	1.67
Reading	1.00
Science	2.50
Social Studies	0.20

Vacant Position	FTE
Special Education	9.30
Special Ed. Bilingual	4.00
Speech & Hearing	1.10
Technology	2.70
Total	50.23



Teacher Vacancies, 10/28/22

# 12 - Anna Murray-Douglass Academy	FTE
Elementary	1.00
Elementary Bilingual	1.00
Special Education	0.80

# 15 - Children's School - ES	FTE
ESOL	0.20

# 19 - Dr Charles T Lunsford – ES	FTE
Technology	0.40

# 17 - Enrico Fermi - ES	FTE
Elementary Bilingual	3.00
ESOL	1.00
Foreign Language	1.20
Special Education	0.40
Special Education Bilingual	2.00

# 22 - Abraham Lincoln - ES	FTE
Elementary Bilingual	1.00
Elementary	1.00

# 28 - Henry Hudson - ES	FTE
Social Worker Bilingual	1.00
Elementary Bilingual	1.00
ESOL	1.90
Family/Consumer Science	0.40
Social Studies	0.20
Special Education Bilingual	2.00
Technology	0.80



Teacher Vacancies, 10/28/22

# 3 - Dr Alice Holloway Young	FTE
Foreign Language	1.00

# 33 - John James Audubon - ES	FTE
Special Education	1.00
Speech & Hearing	0.70

# 34 - Dr Louis A Cerulli - ES	FTE
Special Education	0.50

# 39 - Andrew J Townson - ES	FTE
Reading	1.00

# 4 - George M Forbes - ES	FTE
Special Education	0.60

# 45 - Mary McLeod Bethune - ES	FTE
Special Education	1.00

# 5 - John Williams - ES	FTE
ESOL	1.00
Mathematics	0.50
Science	0.20
Technology	0.50

# 50 - Helen B Montgomery - ES	FTE
Family/Consumer Science	0.30
Mathematics	1.00

Teacher Vacancies, 10/28/22

# 53 - Montessori Academy	FTE
Special Education	1.00
Pre-Kindergarten	1.67

# 58 - World of Inquiry	FTE
Mathematics	0.80

# 8 - Roberto Clemente – ES	FTE
Speech & Hearing	0.40

All City High	FTE
Reading	1.00

Edison Career & Technology HS	FTE
Auto Mechanics	0.20

James Monroe Lower School	FTE
Foreign Language	1.40

Jos. C. Wilson Found Academy	FTE
Special Education	1.40

North STAR Educational Program	FTE
Technology	1.00

Northeast High School	FTE
ESOL	0.20
Foreign Language	0.40
Mathematics	1.60
Music	0.10
Science	1.30
Special Education	2.60

Teacher Vacancies, 10/28/22

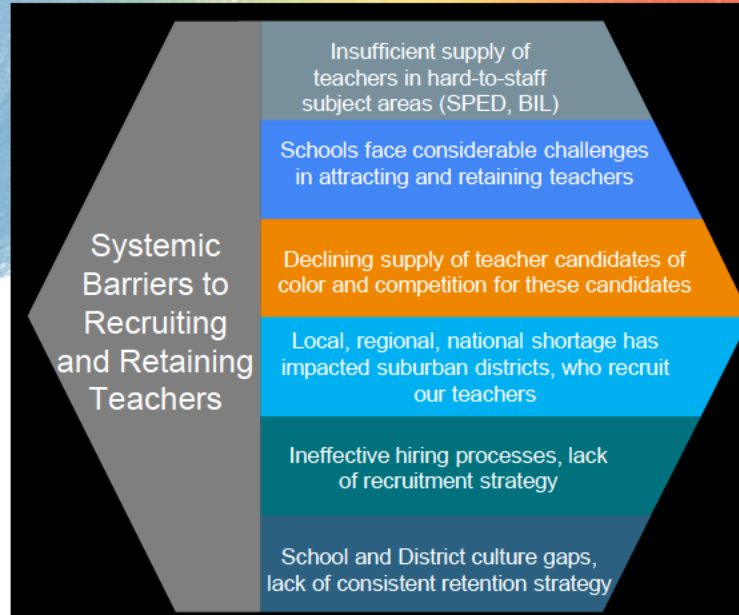
Rochester International Academy	FTE
ESOL	3.96

School of the Arts - HS	FTE
Foreign Language	1.00

School Without Walls - HS	FTE
Mathematics	0.60

Barriers to Recruiting & Retaining Teachers

Several systemic barriers exist that prevent us from recruiting, retaining and developing a high quality and diverse teaching force



Our strategy includes several key programmatic work streams to attract, retain, and develop the right talent

NEW TEACHER RESIDENCY PROGRAMS	STRONGER TEACHER RECRUITMENT	INTENSIVE RECRUITMENT SUPPORT OF SCHOOLS	DEFINED ROLES FOR TEACHER LEADERSHIP	NEW, DIVERSE TEACHER PIPELINES
				
Prepare 275+ new teachers in high-demand subject areas over the next 5 years	Improve recruitment strategy and operations to attract high quality, diverse candidates	Provide talent management support to schools to recruit, hire grow, develop, and retain staff	Recognize excellence among teachers with opportunities for leadership without leaving the classroom	Engage with partners for a citywide effort to grow the diversity of the teacher talent pool long-term
Recruit, develop, support and retain the most effective diverse staff.				

Teacher Recruitment Pipelines

Goals

1. Increase number of teachers in hard to staff areas/subjects
2. Increase number of teachers of color and who are bilingual
3. Provide assistance to cover some tuition costs in exchange for commitment to work in RCSD—partner with multiple colleges to pipeline to RCSD



Teach Rochester Program

Goals

1. Create middle school clubs for students who may be interested in teaching, field trips, visits to East & colleges
2. Link those students to the East HS Teaching & Learning Institute (TLI) students
3. Increase enrollment in East TLI in 9th grade
4. Develop second TLI-like program at a different high school focused on bilingual recruitment



Career Ladders & Grown our Own

- Paraprofessionals to Teaching Assistants
- Teaching Assistants to Teachers
- Teacher to Teacher Leader, Aspiring Leader
- Safety & Security—Sentries
- Assistant Custodial Engineers



Recruitment Ambassadors & HBCU Recruitment

- Trained Recruitment Ambassadors who will represent the RCSD Brand
 - Diverse representation
 - HBCU graduates
 - Current RCSD Staff & Trained Stakeholders
- Represent RCSD at recruitment events locally, regionally, nationally
- Develop and implement a race and class consciousness rubric for recruitment to ensure we build a workforce our students need



Priorities & Future Needs

- Financial assistance for development of Recruitment Ambassadors & related travel
- Sustained commitment to resources to support recruitment & retention activities post CRRSAA & ARP
- Financial assistance for tuition reimbursement & career ladder programs to grow our own



[illegible]



Exhibit B

Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

Human Resource Sub-Committee DRAFT November 25, 2019				
Mission Statement	Work toward ensuring that staffing of the RCSD will reflect the racial composition of the student population.			
District and Community Goals	<ol style="list-style-type: none"> 1. Recruit and retain significantly greater numbers of qualified, appropriately credentialed, underrepresented race and class-conscious staff of color: African American, Hispanic, Asian, and Native American. 2. Improve quality, consistency and transparency of communications as they pertain to internal and external hiring and retention practices. 3. Engage students, parents, and community in the overall recruitment, hiring and retention of District staffing. 4. Implement systemic, equitable hiring practices. 			
Deliverables		Accountability		
Measurable Outcomes & Benchmark Due Dates	Strategies and Tactics	Implementation Responsibility	Monitoring & Evaluation Responsibility	Corrective Action
10 percent year-over-year improvement in number of Staff of color hired (e.g. if there were 87 staff of color hired in 2018-19, we would expect 96 hired in 2019-20) in compliance with state requirements in each bargaining unit: a) BEG	<ol style="list-style-type: none"> 1. Recruit and retain significantly greater numbers of qualified, appropriately credentialed, underrepresented race and class-conscious staff of color: African American, Hispanic, Asian, and Native American. People who are certified/qualified must be given priority for hire over people who are seeking certification through transitional options. <ol style="list-style-type: none"> a. Increase recruitment efforts at Historic Black Colleges & Universities (HBCUs) and Hispanic Association of Colleges & Universities (HACUs) 	HR	Superintendent and REAL Team	TBD

Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

<ul style="list-style-type: none"> b) SEG c) ASAR d) RAP e) RTA f) BENTE 	<ul style="list-style-type: none"> i. Use characteristics of race and class conscious teachers (see below for details) as recruitment tool to attract mission-driven teachers b. Expand “Grow Your Own” Strategies: <ul style="list-style-type: none"> i. Move employees up the career ladder across all programs inclusive of Teaching Assistants, Paraprofessionals, and Per Diem Substitutes ii. Mobilize local individuals looking for second career opportunities through Public Relations and Recruitment efforts, e.g. Rochester Works iii. Leverage relationships w/NYSED to create reciprocal agreements with other state certification programs and create additional pathways for certification, e.g. Empire State College iv. Establish fast-track teacher education/certification process across all RCSD programs by developing partnerships with local colleges and technical schools 	HR	Superintendent and REAL Team	TBD
<p>Parent and community satisfaction survey used to evaluate hiring and retention practices and capture suggestions for improvement; survey establishes baseline satisfaction for future</p>	<ul style="list-style-type: none"> 2. Improve quality, consistency and transparency of communications as they pertain to internal and external hiring and retention practices. <ul style="list-style-type: none"> a. Develop an online Dashboard that is known and accessible to all current RCSD staff and the community and includes: <ul style="list-style-type: none"> i. Current hiring and retention statistics ii. Hiring opportunities iii. Exit interview information 			

Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

<p>measurement against targets</p> <p>RCSD holds 10 job fairs in 2019 in partnership with community organizations</p> <p>10 percent year-over-year increase in number of teachers of color</p> <p>Hiring practices documented and reviewed in fall 2019 REAL Team meeting</p> <p>Establish quarterly HR report delivered to</p>	<ul style="list-style-type: none"> b. Raise awareness of methods for teachers and parents to report complaints in accordance with Board policies (e.g. to Parent Engagement Office and REAL Team) c. Hold focus group of parents, community members, and faith groups to inform parent and community satisfaction survey used to evaluate hiring goals, procedures, and outcomes AND develop rubric for race and class conscious teachers based on T&L definitions <p>3. Engage students, parents, and community in the overall recruitment, hiring and retention of District staffing.</p> <ul style="list-style-type: none"> a. Leverage community relationships to promote awareness of job/career opportunities, i.e. job fairs, and other community outreach activities. <p>4. Implement systemic, equitable hiring practices.</p> <ul style="list-style-type: none"> a. Standardize and document Building-level and District level hiring practices that emphasize equity. <ul style="list-style-type: none"> i. Ongoing Racial Equity education for all new hires ii. Evaluate prospective hires for race and class consciousness using rubric developed in partnership with the community through focus group iii. Engage REAL Team to review hiring practices and improper administrative practices 	<p>HR</p>	<p>Superintendent and REAL Team</p>	<p>TBD</p>
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Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

REAL Team and community at Board meetings to track and communicate progress	<ul style="list-style-type: none"> b. Develop Guidelines for hiring administrators that ensure diversity of the selection team and candidate pool. c. Educate and hold building and area administrators accountable for equitable hiring and recruitment practices and systems change. d. Explore the feasibility of: <ul style="list-style-type: none"> i. HR, school-based planning teams, and Superintendent reviewing all building and district levels selections for racial equity before submitting to the Board. ii. Instituting a mandatory hiring checklist that documents whether underrepresented candidates were interviewed and reasons for not hiring or interviewing. iii. Documenting characteristics each candidate possesses regarding "Race & Class Consciousness." (to be defined at a later date) 			
Timeline	Implementation timeline will be defined in Action Plan for each set of goals, strategies, and tactics.			
Policy Foundations for HR Goals & Accountability	<p>The RCSD Equal Opportunity Policy (Manual from August 20, 1998, Policy 9110) states:</p> <p>The Superintendent of Schools shall ensure that applicants for open positions in either the administrative, instructional or support staff of the district, are actively sought from members of any minority group which is underrepresented in that staff. Candidates for open positions, as well as for promotion and transfer, will be evaluated on the basis of education, experience and ability, to determine fitness to perform the duties of the position.</p> <p>Ensuring equal employment shall be a fundamental and direct responsibility of all levels. Management, administrators and supervisors shall be required to comply with governmental regulations and the equal employment opportunity goals of the district.</p>			

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

	<p>Anyone who believes that he or she has been subject to unequal treatment shall notify in writing either the Superintendent of Schools, Supervising Director of Human Resources or the district's Affirmative Action Officer. A determination will be made within thirty (30) days. Retaliation against anyone who has filed or involved in a complaint is strictly prohibited.</p> <p>New York State Education Law 100.11. Participation of parents and teachers in school-based planning and shared decision-making. Parent engagement is required in the School Based Planning Team process</p> <p>New York State Education Law 3009. Unqualified teachers should not be paid from school moneys.</p> <ol style="list-style-type: none"> 1. No part of the school moneys apportioned to a district shall be applied to the payment of the salary of an unqualified teacher, nor shall his salary, or any part thereof, be collected by a district tax except as provided in this chapter. 2. A. Notwithstanding any other provision of law to the contrary, the school authorities of any school district shall have the power, in their discretion, to employ persons as teacher aides who shall assist the regular teacher or teachers of the district in the performance of their teaching functions by performing those nonteaching duties otherwise performed by such regular teacher or teachers. B. Notwithstanding any other provision of law to the contrary, the school authorities of any school district shall have the power, in their discretion, to employ persons as teaching assistants. Such persons, if so employed, shall be authorized to act only under the general supervision of a licensed or certified teacher. <p>New York State Education Law 3010. Penalty for payment of unqualified teacher. Any trustee or member of a board of education who applies, or directs, or consents to the application of, any district money to the payment of an unqualified teacher's salary, thereby commits a misdemeanor; and any fine imposed upon him therefore shall be for the benefit of the common schools of the district.</p> <p>New York State Education Law 3013. Abolition of office or position.</p> <ol style="list-style-type: none"> 1. If a trustee, board of trustees, board of education or board of cooperative educational services abolishes an office or position and creates another office or position for the performance of duties similar to those performed in the office or position abolished, the person filling such office or position at the time of its abolishment shall be appointed to the office or position thus created without reduction in salary or increment, provided the record of such person has been one of faithful, competent service in the office or position her or she has filled. 2. Whenever a trustee, board of trustee, board of education or board of cooperative educational services abolishes a position under this chapter, the services of the teacher having the least seniority in the system within the tenure of the position abolished shall be discontinued.
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	<p>3. A. If an office or position is abolished or if it is consolidated with another position without creating a new position, the person filling such position at the time of its abolishment or consolidation shall be placed upon a preferred eligible list of candidates for appointment to a vacancy that then exists or that may thereafter occur in an office or position similar to the one which such person filled without reduction in salary or increment, provided he record of such person has been one of faithful, competent service in the office or position he or she has filled. The persons on such preferred list shall be reinstated or appointed to such vacancies in such corresponding or similar positions in the order of their length of service in the system at any time within seven years from the date of abolition or consolidation of such office or position.</p> <p>B. The persons on such preferred list shall be reinstated, in accordance with the terms of paragraph (A) of this subdivision, to such substitute positions of five months or more in duration, as may from time to time occur without losing their preferred status on such list. Declination of such reinstatement shall not adversely affect the persons' preferred eligibility status.</p>
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	<p>Relationship Building Sub-Committee DRAFT November 25, 2019</p>
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Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

Mission Statement	Work toward ensuring that adults will unlearn racist attitudes, belief systems, and behavioral practices in order to cultivate equitable and positive relationships. School community members will learn how to think critically about racism and take responsibility by reflecting upon their behavior and making amends.			
District and Community Goals	<ol style="list-style-type: none"> 1. Review the Code of Conduct (COC) and its processes with students, parents, the community and RCSD staff to ensure that all stakeholders are aware of content, expectations, and usage. 2. All staff are required to be educated in anti-racism. Teachers will have a yearly professional development plan, pre-approved by building level administration and the school-based planning team, which encompasses at least 15 hours in the following areas: implicit bias, restorative practices, culturally relevant pedagogy, effective classroom management strategies, social/emotional support for students, and the history of institutional racism in public education. 3. All School Safety Officers, office staff, and every person in contact with student, parents, and the community will be professional, respectful, and create a warm, friendly, welcoming, and helpful environment. 			
Deliverables		Accountability		
Measurable Outcomes & Benchmark Due Dates	Strategies and Tactics	Implementation Responsibility	Monitoring & Evaluation Responsibility	Corrective Action
By June 2020, 100% of employees will have received trainings on the Code of Conduct	<ol style="list-style-type: none"> 1. Review the Code of Conduct (COC) and its processes with students, parents, the community and RCSD staff to ensure that all stakeholders are aware of content, expectations, and usage. <ol style="list-style-type: none"> a. Provide a semi-annual Code of Conduct community gathering for students, families and community. b. Newsletters, printed materials, and mini videos on the Code of Conduct will be made available in the main office and/or the parent center. 	Building Principal/Program Administrator/ REAL Team	Superintendent & REAL Team	

Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

<p>By June 2020, 100% of teachers will have completed a minimum of 15 hours of approved Professional Learning in these areas:</p> <p>Anti-racist/bias practices and Restorative Justice</p> <p>By June 2020, 100% of members of these unions will have had customer service Professional development</p>	<ul style="list-style-type: none"> c. The Code of Conduct will be made available in all languages represented in each school. d. The Code of Conduct is one topic that will be covered during the first Superintendent's Conference Day. <p>2. All staff are required to be educated in anti-racism. Teachers will have a yearly professional development plan, pre-approved by building level administration and the school-based planning team, which encompasses at least 15 hours in the following areas: implicit bias, restorative practices, culturally relevant pedagogy, effective classroom management strategies, social/emotional support for students, and the history of institutional racism in public education.</p> <ul style="list-style-type: none"> a. Collaboration with all unions is imperative for the success of our vision as a District. Activities may include: Collegial Circles, TrueNorth Logic Professional Learning Classes, Workshops, Conferences, Seminars, Community offerings, Rochester Teacher Center, ROC Restorative <p>3. All School Safety Officers, office staff, and every person in contact with student, parents, and the community will be professional, respectful, and create a warm, friendly, welcoming, and helpful environment.</p>	<p>Principals/Program Administrator, Building School Based Planning Teams/ REAL Team</p>	<p>Superintendent & REAL Team</p> <p>Superintendent & REAL Team</p>	
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Racial Equity Advocacy Leadership (REAL) Team Plan

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	a. Customer service, anti-racism, implicit bias, and cultural responsiveness education will be provided to all union members.			
Exemplars of Goals in Action	<ul style="list-style-type: none">▪ Decreased classroom removals▪ Meaningful and regular contact with parents (documented)▪ Increased RP check-ins and circles▪ Alternatives to suspension▪ Community participation in classrooms (documented)▪ Implementation of culturally relevant pedagogy, PD and curriculum design▪ Pre, mid, and post school climate surveys indicate a positive shift in culture and climate▪ Feedback from parents and students indicate that school is safe, welcoming, and inclusive			

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

	Professional Learning Sub-Committee DRAFT November 25, 2019
Mission Statement	Work toward ensuring that all RCSD educators will demonstrate fundamental understanding and commitment to valuing the importance of race and class consciousness.
District and Community Goals	<ol style="list-style-type: none"> 1. Initiate a process for the REAL team to develop a common language regarding key concepts and realities related to racism and racial equity in the RCSD, which must be disseminated throughout the institution (with a clear expectation that all RCSD employees will familiarize themselves with the language). 2. Create an aligned framework that captures (within the Racial Equity Action Plan) all RCSD initiatives that address racism and racial equity through professional learning, (see attached list of RCSD initiatives that address racism and racial equity through professional learning). The intent is that facilitators of all RCSD initiatives that address racism and racial equity through professional learning will understand goals and objectives of each, and will be aware of specific RCSD populations that each has worked with, and/or are working with, so that the various initiatives may be able to coordinate their collective efforts, and accurately measure their respective and collective impacts. 3. Create a process to ensure that all RCSD employees who work directly with students, including outside contractors, receive ongoing education from the RCSD concerning the significance and importance of individual, institutional, and structural racism (as it is manifested historically, and as it continues to operate via attitudes, belief-systems, rules, regulations, policies, practices, procedures, and laws that guide and governs the institution of public education). 4. Review the RCSD Mentorship process/program, with emphasis on creating racial equity, relative to candidate selection process --- see '<i>Career in Teaching (CIT) Lead Teacher-Mentor Selection Process</i>' attached. 5. Work toward development and implementation of a plan to significantly strengthen and expand the Teaching and Learning Institute (TLI) Program.

Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

REAL VISION STATEMENT: RCSD will be a thoroughly anti-racist institution that ensures equitable opportunities for all.

Deliverables		Accountability		
Measurable Outcomes & Benchmark Due Dates	Strategies and Tactics	Implementation Responsibility	Monitoring & Evaluation Responsibility	Corrective Action
Complete (with understanding that list may expand).	1. Initiate a process for the REAL team to develop a common language regarding key concepts and realities related to racism and racial equity in the RCSD, which must be disseminated throughout the institution (with a clear expectation that all RCSD employees will familiarize themselves with the language). a. The Professional Learning Subcommittee will present an initial list of ideas, concepts and vocabulary at a General REAL meeting for discussion/agreement.	Supt. & REAL team	Supt. & REAL Team	
Recommend a process for dissemination, December 2019; Begin rollout process for common language dissemination/ acquisition, Feb. 2020	b. Once agreement is reached, the REAL team will recommend a process for dissemination and follow up.			
Utilize various virtual/ electronic formats to	2. Create an aligned framework that captures (within the Racial Equity Action Plan) all RCSD		Supt. & REAL Team	

Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

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begin disseminating information throughout the institution and broader community regarding RCSD initiatives that address racism through professional learning, Spring, 2020	initiatives that address racism and racial equity through professional learning, (see attached list of RCSD initiatives that address racism and racial equity through professional learning). The intent is that facilitators of all RCSD initiatives that address racism and racial equity through professional learning will understand goals and objectives of each, and will be aware of specific RCSD populations that each has worked with, and/or are working with, so that the various initiatives may be able to coordinate their collective efforts, and accurately measure their respective and collective impacts. The Professional Learning Subcommittee will develop and present (for agreement) to the REAL team an aligned framework that captures (within the Racial Equity Action Plan) details regarding all RCSD initiatives that address racism and racial equity through professional learning. This will include goals and objectives of each initiative, and outlines regarding respective RCSD populations that will be serviced by each initiative during the 2019-20 school year. This process will be revisited annually.	Supt.; Prof. Learning Subcommittee; REAL team		
Regarding ongoing, anti-racist education, begin (immediately) exploring a vetting process for onboarding outside contractors who work directly with	3. Create a process to ensure that all RCSD employees who work directly with students, including outside contractors, receive ongoing education from the RCSD concerning the significance and importance of individual, institutional, and structural racism (as it is	Supt.; Prof. Learning Subcommittee; REAL team	Supt. & REAL Team	

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<p>RCSD students and families, projected rollout/ launch date, Sept. 2021</p> <p>See attached information regarding proposed definition / criteria for race and class-conscious staff</p> <p>In order to achieve racial equity, racial makeup of the mentorship program should reflect the overall student population, e.g., roughly 80% of the student population is composed of students of color. In order to achieve equity: 1) communication regarding existence and details of the program must be greatly improved; 2) produce a 10% or more year-over-year increase relative to racial equity, beginning</p>	<p>manifested historically, and laws that guide and govern the institution of public education).</p> <p>The Professional Learning Subcommittee will work collaboratively with the RCSD to develop:</p> <ol style="list-style-type: none"> a process to identify and engage individuals and organizations (in addition to those listed as part of Goal #2) that are qualified and capable of helping to address racism and racial equity through professional learning, especially as it relates to ongoing education for outside contractors who work directly with RCSD students. criteria for race and class-conscious Staff. <p>4. Monitor the RCSD Mentorship process/program, with emphasis on creating racial equity, relative to candidate selection process --- see '<i>Career in Teaching (CIT) Lead Teacher-Mentor Selection Process</i>' attached; monitor racial makeup of the CIT governing panel.</p>	<p>Supt.; HR; Prof. Learning Subcommittee; REAL team</p>	<p>Supt. & REAL Team</p>	
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Racial Equity Advocacy Leadership (REAL) Team Plan

Racial Equity Action

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with 2020-21 compared to 2019-20 Continue meeting with Program founders, Superintendents, Director of Placement, and other key individuals, Next meeting, Nov. 2019	5. Work toward development and implementation of a plan to significantly strengthen and expand the Teaching and Learning Institute (TLI) Program. The Professional Learning Subcommittee will initiate an effort to collaborate with Teaching and Learning Institute (TLI) staff, and other key individuals, to explore what (specifically) would be necessary in order to significantly strengthen and expand the TLI Program.	Prof. Learning Subcommittee	Supt.; REAL team Prof. Learning Subcommittee	
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