

PREAMBLE

The School Board for the City of Richmond (“Board”) engaged Sands Anderson PC (“Review Team” or “Reviewers”) to investigate and report about certain circumstances related to the June 6, 2023, shooting following the Richmond Public Schools’ (“RPS”) Huguenot High School (“HHS”) Graduation. Our Review Team provides the following Review Report which has been prepared according to the parameters of the requested investigation, as set out in the Board’s October 2, 2023, Resolution (“Resolution”).¹ The Resolution requested three discrete areas of inquiry:

- a. Report all findings to the School Board that include graduation day operations from set up, to break down, and to include process and procedures for entrance of all students and guests.
- b. To report to the School Board any findings that include written statements from RPS Division staff and HHS staff involved with the June 6 graduations preparations of all graduations on June 6.
- c. Include in the third-party review, the breakdown of our homebound process and procedures that directly impact grading.

In addition, prior to beginning this Review, the Review Team communicated with the Board and RPS leadership to confirm that certain topics were beyond the scope of this Review. The Board and RPS leadership confirmed that the following topics were beyond the scope of the requested Review, and accordingly these topics were not investigated, nor are they reported on in this Review Report.

Subjects Beyond the Scope of the Review:

- What crimes, if any, were committed on June 6, 2023, at the Huguenot High School graduation and who committed them.
- Whether the shooting at Huguenot High School could have been prevented.
- Whether policies and procedures relating to graduations or other large events should change, and if so how, in light of the experience of June 6, 2023.
- Status of pending criminal prosecutions related to June 6, 2023, shooting.
- Recommendations regarding personnel matters in light of the June 6, 2023, shooting.

Information Reviewed by the Review Team

At all times during this Review, RPS leadership remained transparent, responsive and cooperative. In addition to the more than 100 documents provided by RPS staff and members of the Board, the Review Team conducted the following interviews to inform this Review Report:

¹ Exhibit 1

CONFIDENTIAL-ATTORNEY-CLIENT PRIVILEGED-WORK PRODUCT
EXEMPT FROM VIRGINIA FREEDOM OF INFORMATION ACT

RPS Staff Members	Position	Interview Length (hour:minute)	Date/Time
BEAZELY, John	Director of Care & Safety	10/9/23 @ 3:00 p.m.	0:16
CORBIN, Brukisha	Care & Safety Supervisor	10/11/23 @ 10:00 a.m.	0:34
CROSBY, Robert	CSA	10/19/23 @ 12:30 p.m.	0:55
DIMICHELE, Anthony	CSA	10/24/23 @ 10:00 a.m.	0:16
FECHT, Monica	Emergency Management Coordinator	10/10/23 @ 930 a.m.	1:15
FLOWERS, Brigitte	CSA	10/19/23 @ 2:30 p.m.	0:44
FOX, Rebecca	Secondary Success Support Specialist	10/16/23 @ 11:00 a.m.	1:49
GIBSON, Kenya	School Board	10/23/23 @ 12:00 p.m.	0:40
HARRIS, Monique	Counselor Huguenot High School	10/17/23 @ 11:00 a.m.	3:03
HARRIS-MUHAMMED, Dr. Shonda	School Board	10/11/23 @ 4:30 p.m.	0:56
HARRISON, Lisa	Lead Counselor Huguenot HS	10/12/23 @ 10:00 a.m.	1:49
HAWKES, Dandridge	Care & Safety Supervisor	10/18/23 @ 10:00 a.m.	0:59
JEFFERSON, Solomon	Chief Academic Officer Secondary	1/26/23 @ 10:30 a.m.	2:12
JONES, Angela	Director of School Culture Climate and Student Services	10/19/23 @ 5:30 p.m.	0:43
KAMRAS, Jason	Superintendent	11/3/23 @ 10:00 a.m.	:44
MASSA, Michael	Principal Huguenot High School	10/17/23 @ 10:00 a.m.	1:00
MONROE, Kevin	APHHS	10/25/23 @ 1:30 p.m.	0:56
MORRIS, Peggy-Anne	CSA	10/20/23 @ 10:00 a.m.	0:24
PARKS, Renesha	Chief Wellness Officer	10/9/23 @ 11:00 a.m.	1:05
PORTEE, Sandra (Pillard)	Home Services Coordinator	10/10/23 @ 2:00 p.m.	1:11
RAMSEY, Dr. Stefanie	Coordinator of Physical Education	10/18/23 @ 9:00 a.m.	0:17
RIZZI, Stephanie	School Board	10/23/23 @ 1:00 p.m.	0:42
SANCHEZ-CONCHA, Lyon	Asst. Principal, Huguenot High School	10/25/23 @ 12:30 p.m.	1:22
SHORT, Tess	School Counseling Specialist	10/16/23 @ 1:00 p.m.	0:32
SMITH, Renee	Teachers, Graduation Committee	10/16/23 @ 3:00 p.m.	0:14
VENABLE, Wyatt	CSA	10/23/23 @ 2:30 p.m.	0:26
VENY-CHAPLIN, Candace	Pathways	10/12/23 @ 3:00 p.m.	0:48
WADE, Valenta	Manager of Testing and Data Systems, RPS	10/20/23 @ 11:00 a.m.	0:40
YOUNG, Jonathan	School Board	10/18/23 @ 12:00 p.m.	0:38
			TOTAL: 26:02

Privacy of the Family of Shawn Jackson

In conducting this Review, the Review Team sought to respect the the privacy of Shawn Jackson, his step-father Renzo Smith, and his mother Tameeka Smith. On October 6, 2023, a letter was sent to Ms. Smith from the Review Team, expressing condolences, and providing our contact information should she choose to provide input to inform this Review. The letter made clear that no member of the Review Team would make additional contact with her unless she invited us to do so.² Ms. Smith did not contribute to this Review.

Additionally, throughout this Review Report Shawn Jackson shall be referred to as the “Student” and Ms. Smith shall be referred to as the “Mother.”

² Exhibit 2

REVIEW REPORT

I. Report all findings to the School Board that include graduation day operations from set up, to break down, and to include process and procedures for entrance of all students and guests.

2023 Graduation Planning

In 2023 RPS graduation ceremonies for the comprehensive schools and specialty schools were scheduled to take place at the Altria Theater (“the Altria”) located at 6 North Laurel Street, Richmond, VA 23220. The Altria venue was selected due to its history of hosting RPS graduations prior to the Covid-19 pandemic.³ RPS’s Chief Academic Officer for Secondary, Mr. Solomon Jefferson, executed a contract (“Agreement”) with ASM the Operator of the Altria (“Operator”) on April 19, 2023, for use of the Altria for the ceremonies.⁴

The HHS graduation was scheduled to be the second RPS graduation in 2023, and was the second scheduled graduation on June 6, 2023, starting at 4:00 p.m., following the Richmond Community High School graduation which had taken place at the Altria at 10:00 a.m. earlier that day.

Since January 2022, Ms. Candace Veney-Chaplin, RPS Manager of College and Career Pathways was assigned to coordinate graduation ceremonies. To set the program for the RPS graduations, Ms. Veney-Chaplin convened “June Graduation Planning/Update” meetings from April 12, 2023, through May 31, 2023. Eight of these meetings were held and brought together key RPS personnel to develop the plans and coordinate details for all graduations. According to Ms. Veney-Chaplin, her responsibility was to represent the central office in coordinating the “bigger logistics” of the graduation ceremonies, while the individual schools’ representatives in the meetings were tasked with filling in distinct information for their schools’ programs.⁵

The basic agenda for these meetings evidence the following discussion topics: 1) project planning (updates/reminders); 2) tasks brought forward from prior meetings; 3) Potential graduates; 3) Post graduation plans; and 4) Next steps for tasks needing follow-up. Most of the meeting agenda was dedicated to items that would be considered logistical issues such as programs, music, volunteers, decorations, dignitaries, and interpreters.⁶

Security planning was shown as a discussion point in the tasks line item on at least five of the eight meetings. Related to security discussions in the meetings, Ms. Veney-Chaplin recalled the following:⁷

V-C.: I can recall us talking about the magnetometers would be covered by RMC, that we would have RPD and RFD

³ Exhibit 3

⁴ Exhibit 4

⁵ Exhibit 3

⁶ Exhibit 5

⁷ Exhibit 3

available and on site. That security would, RPS, uh security would be in the auditorium and would be the first line if anybody in the audience, any families had a question or concern. And uh you know, from there, they, we would, you know, of course, move to RPD if, if needed. Those are the key things that come to mind when I think about our discussions about security.

Reviewer: When you say RPS security. Are you talking about the CSAs?

V-C.: Um Yeah, I'm talking about our care and safety team. Yes.

Reviewer: Did you have anything? Uh But did you participate in, in decision making about how many CSAs or be or what their role would be?

V-C.: No, I, I received a copy of a spreadsheet saying, who was going to be assigned to what got you.

Ms. Monica Fecht, RPS Emergency Management/Training Coordinator, was shown to be in attendance for at least two meetings. Though not shown on any agenda, Ms. Brukisha Corbin, RPS Care and Safety Associate (“CSA”) Supervisor, was reported to have attended to represent security issues.⁸ Ms. Veney-Chaplin advised that the Altria personnel were also included in meetings to discuss the Agreement, and issues related to the venue. Issues related to security were “left to RPS safety and security department [working] with RMC as the contractor....and they also connected with RPD and RFD. And they worked with the Altria to make sure that they were aligned with the Altria’s expectations.”⁹ Ms. Veney-Chaplin’s detailing of security responsibilities was consistent with the provisions of the Agreement. All final plans developed in these meetings required review from Mr. Jefferson.¹⁰

RPS also created and maintained an “RPS Run of Show” graduation spreadsheet for each school ceremony. The spreadsheet provided the specific details of each school ceremony as they were developed in the planning meetings. Related to the HHS graduation, the Run of Show was as arranged as follows:¹¹

- Timeline:
 - 3:00 p.m. graduates arrive at Altria and proceed to ballroom. School team to organize the students in the ballroom to mirror auditorium seating.
 - 3:45 p.m. students and school team line up to prepare for procession.
 - 3:50 p.m. dignitaries line up to prepare for procession.
 - 3:55 p.m. students, school team, dignitaries walk to meet at the steps.

⁸ Exhibit 3

⁹ Exhibit 3

¹⁰ Exhibit 3

¹¹ Exhibit 6

- 3:57 p.m. no guest to be allowed in at this time (guests can begin to filter in again after processional and presentation of colors/National Anthem).
- 4:00 p.m. processional begins.
- Program to proceed as written.
- Recessional concludes the program.

To prepare the logistical information that guided Ms. Veney-Chaplin's meetings, graduation coordinators representing each high school met regularly with the stated objective "to clarify expectations for a great graduation season in 2023 and to provide direct support to schools." HHS was represented in these meetings by Ms. Lisa Harrison, Lead Counselor for HHS. This group's meeting agenda did not have line items related to specific students and/or security planning.¹² The members of this group were responsible for populating "Graduation Preparedness Checklists" for each high school graduation.¹³ The checklists detailed planning information such as the status of diplomas and diploma covers, commencement programs, interpreters, tickets, stage participants, rehearsal plans, and student bus transportation to the venue.

Although there was a field in each checklist to provide information about graduation rehearsal plans, on the HHS checklist this field was empty. However, the HHS 2023 Graduation Coach, Mr. Lyons Sanchezconcha, reported that HHS did conduct graduation rehearsals on May 31st and June 1st at HHS.¹⁴ Mr. Sanchezconcha reported that he did not recall the Student participating in either rehearsal. Email communications between the Student's HHS Counselor, Ms. Monique Harris and his Mother indicated the Student did not participate in the rehearsals. On May 30, 2023, when the Mother asked the Counselor whether the Student would participate in graduation practice, or if the Counselor would "squeeze him in on [graduation] day," the Counselor advised, "I will just squeeze him in if you feel that [graduation practice is] too dangerous." Consequently, rehearsal participation did not appear to be a requirement to attend graduation, nor was participation documented. Had rehearsal participation been required and attendance documented, this could have informed the development or sharing of intelligence about the safety concerns that kept the Student away from a rehearsal, and why those security issues might also be of concern if the Student then attended the graduation.

Additional planning for the graduation included RPS' creation of the "RPS Graduation Schedule 2023" document which detailed each schools' graduation schedule, RPS leadership to be in attendance, School Board members to be in attendance, and the number of passes needed for each.¹⁵

The Altria Agreement

While the planning of logistics for the graduation events was getting underway, RPS finalized the Agreement for use of the Altria for its graduation ceremonies on April 19, 2023. The terms and details of the Agreement were negotiated with Ms. Audrey Booth, the Altria's Event

¹² Exhibit 7

¹³ Exhibit 8

¹⁴ Exhibit 9

¹⁵ Exhibit 10

Specialist, and was signed by Mr. Glenn Major, General Manager for ASM¹⁶. Booth also served as the point of contact with the schools on behalf of the Altria and was the primary source of information for the security arrangements the Altria was contractually obligated to provide under the Agreement.

According to the Agreement, by payment of the sum of \$45,318.64, RPS was to be provided use of the Altria on June 6, 7, and 8, 2023, to conduct eight graduation ceremonies.¹⁷ This sum covered a licensing fee to permit use of the venue, and “Reimbursable Services Expenses” which were detailed in “Exhibit B” of the Agreement. In line-item format Exhibit B detailed the equipment, services, and labor for which the Altria would be responsible. Related to security, the Altria contracted to provide 40 walk through magnetometers, and RMC Event Staff to provide security.¹⁸ RMC Event Staff are “unarmed security officers” whose primary purpose “is to enhance safety & security to the students, faculty and staff throughout various locations in the greater Richmond area” through “high visibility and highly proactive engagement.”¹⁹

Additionally, the terms of the Agreement stated the following:²⁰

Operator shall determine the level of staffing for the Services based on its reasonable business judgment. Licensee (RPS) shall inform Operator at least two months in advance of the Event, in writing, of its requirements for services and equipment in support of the Event and Operator shall take such requests into consideration when determining staffing levels for the Event. In the event that Licensee is unable to provide Operator with two weeks advance notice of its requested staffing levels for the Event, Operator’s decision with respect to staffing levels shall control.

The Agreement further provided that “Police, Fire Marshal and EMS services shall be determined by Operator and paid by RPS.”²¹ Per the Agreement the Operator made the determination, and RPS paid for the costs of five Richmond Police Department (“RPD”) off-duty officers to conduct crowd/traffic control outside of the venue.²² RPS also paid the costs for three Fire/EMS to assist outside of the venue according to the Operator’s determination of required staffing levels according to the Agreement.²³

Security Planning

Despite HHS having two assigned school resource officers (“SRO”) during the 2022-2023 school year who may have had information about security issues specific to HHS, neither SRO

¹⁶ Exhibit 4

¹⁷ Exhibit 4

¹⁸ Exhibit 4

¹⁹ Exhibit 11

²⁰ Exhibit 4

²¹ Exhibit 4

²² Exhibit 12

²³ Exhibit 12

worked at the graduation, either inside or outside the venue. By coincidence, one HHS SRO was present at the graduation as a guest but did not attend in his official capacity.²⁴

Although the Altria provided security equipment and security personnel through RMC and determined the staffing level for police and emergency services outside the venue, RPS contributed personnel resources to enhance security inside the venue. In accordance with previous graduations, RPS established the staffing levels and positioning of RPS CSAs inside the venue. In prior years, this was the responsibility of RPS' Director of Safety and Security. However, this position was vacant during the planning of the graduations, and was only filled by John Beazley, on June 7, 2023. Consequently, planning related to deployment of CSAs for the graduations was done by the RPS Emergency Manager, Ms. Fecht, with the assistance of CSA Supervisor, Ms. Corbin.

As detailed above, Ms. Fecht and Ms. Corbin participated in some of the graduation planning meetings convened by Ms. Veney-Chaplin, communicated with Ms. Booth regarding points of entry for participants for the graduations, reviewed the staffing levels for RMC, RPD, Fire and EMS as determined by the venue Operator, and participated in a security walk-through of the Altria with Ms. Booth on May 31, 2023, in order to determine placement of CSAs. Based upon this information RPS assigned 19 CSAs, in addition to Ms. Fecht and Ms. Corbin to work at the HHS graduation.

It should be noted that RPS CSAs are unarmed personnel who, according to their job description, are required to "protect life and property, preserve the public peace, protect individual rights, prevent crime, detect law violators, enforce the Student Code of Responsible Ethics as required to maintain the efficient operation of the educational process and perform assigned duties."²⁵ As unarmed personnel, the CSAs assigned to the graduation were equipped only with their Motorola XPR 3500e Radios. In addition to being unarmed, CSAs have no power of arrest and no authority other than their ability to leverage relationships with students and families to keep the peace. At the graduations they assisted with ticket collection, organization of the graduates for procession, and facilitated crowd management and movement inside the venue.²⁶

At the HHS graduation CSAs were pre-assigned to positions according to a map prepared by Ms. Fecht and Ms. Corbin.²⁷ The assignments deployed 21 personnel assigned as follows: two roving supervisors (B. Corbin and M. Fecht); one 1st level supervisor (Lt. D. Hawkes); seven 1st level CSAs (B. Flowers, S. Fernandez, K. Watson, R. Walters, R. Crosby, K. Jones, P. Morris); one 2nd & 3rd level (Grand Tier and Upper Balcony) supervisor (Lt. J. Tucker); six 2nd level (Grand Tier) CSAs (E. Adams, K. Thomas, C. Gill, J. Mejia, K. Tucker, A. DiMichele); and four 3rd level (Balcony) CSAs (M. Jones, W. Venable, J. Williams, H. Dillard).

The CSAs were required to report to venue for briefings in the lobby that were scheduled to take place one hour before each graduation time, which was 3:00 for the HHS graduation.²⁸ These briefings were planned to discuss assignment locations and expectations. The briefings did

²⁴ Exhibit 12

²⁵ Exhibit 13

²⁶ Exhibit 12

²⁷ Exhibit 14

²⁸ Exhibit 15

not include information regarding attendees or security issues because the RPS security team did not receive a list of expected graduates or attendees.

Although CSAs are trained in the use of magnetometers and in conducting security searches, the CSAs were not requested or permitted to participate in these procedures at the graduation venues. That is because the Altria and its contracted security, RMC, assumed exclusive control of these functions according to the Agreement. In fact, the security arrangements discussed during a planning meeting walk-through of the Altria in April 2023 expressed the following division of labor for security:²⁹

If there is a situation RMC will be onsite and be the first point of contact with the parents, if they do not settle down, the RPS Safety & Security will step up, if still not resolved RPD will get involved and the person will be escorted from the Altria.

It should be noted that this expression of division of labor and expectations for security contemplated security planning for parent “situations” and “situations” inside the venue, but did not discuss, contemplate, or plan for student “situations” or “situations” that occur outside the venue.

Because the Altria leadership and management were contractually obligated to serve as command and control of security related to the graduations, the Reviewers considered their participation in this Review to be essential. However, when the Reviewers requested that Ms. Booth participate in an interview for this Review, Ms. Booth refused to respond to the request. Additionally, when on behalf of the Reviewers, Ms. Fecht called Ms. Booth on October 13, 2023, to request access to the Altria to conduct a walk-through to inform this review, Ms. Booth refused the Reviewers access. Immediately following that phone call, Ms. Booth called Ms. Fecht back and further advised Ms. Fecht to inform the Reviewers that they were also not permitted to conduct a walk-around of the exterior of the Altria. This directive was deferred, and the Reviewers did conduct a walk-around of the exterior of the Altria from the public right-of-way, to view the Altria entry and exit points relevant to this Review.

The Reviewers also requested that RMC provide information and make available employees for interview regarding the security measures in place at the Altria on June 6. Citing their role as contractors to the Altria, RMC also refused to provide employees for interview, or to contribute any information to inform this Review.

Communications to Participants and Guests

When planning of the HHS graduation was finalized, RPS anticipated the participation of as many as 3635 people: 25 people on the dais; 310 potential graduates; and up to 3100 graduate guests.³⁰ By a “Letter to Parents and Guardians of the Class of 2023,” dated May 12, 2023, Mr. Jefferson congratulated the graduates on their upcoming graduation and provided details, instructions and restrictions related to the event. In the letter, Mr. Jefferson advised of “bag checks

²⁹ Exhibit 16

³⁰ Exhibit 17

for all visitors, similar to checks that take place at amusement parks, major sporting events and large concerts.” Graduates were further advised:

[To] arrive at the Altria Theater one hour before the ceremony, entering at the Main Street door near Cherry Street. Only graduates can enter here; their cap and gown will be used as identification. Students should not bring phones, purses, or keys. The students will go downstairs to the ballroom to line up. Students may not leave anything in the ballroom as there is no reentry after the ceremony.”³¹

Some officials, volunteers and others supporting the graduation ceremony received an information sheet that, among other things, advised that staff could enter through the main doors on Laurel Street, or through the back entrance that leads backstage. Additionally, this communication advised that all families would be required to exit into Monroe Park.³²

Authorization for Graduation Participation

Regarding participation in the HHS graduation ceremony, no information was provided to demonstrate that any student was actually restricted from graduation participation once they were academically cleared to graduate. As discussed in more detail below related to the homebound process, the RPS Home Instruction Handbook prohibited homebound students from participating in school-sponsored activities unless they were authorized to do so by the principal or his designee. Despite this prohibition, the Student in this case did participate in graduation without authorization from the HHS Principal, Robert Gilstrap. No information was provided that supported the proposition that Mr. Gilstrap authorized a designee to make that decision.

Reportedly, in the 2022-2023 school year all RPS principals were mandated to maintain a “Senior Leadership Team Division of Labor” spreadsheet which would detail the responsibilities of each member of building senior leadership, which included the principal, assistant principals, counseling leads and others acting as department heads. The spreadsheet was also expected to detail who would be a designee for functions if a principal was not going to be make certain decisions.³³ If such a spreadsheet was maintained by Mr. Gilstrap or RPS, it was not provided for this Review, despite a request being issued to central office staff.

Information provided for this Review supports the proposition that the Student’s participation in graduation occurred without any consideration of or adherence to required authorizations, and without proper vetting and consideration of the safety concerns that were known by several members of HHS. While it was stated in the RPS “Monroe Park Shooting Report” dated July 20, 2023, that Ms. Monique Harris acted as the Principal’s designee to authorize the Student’s participation in graduation, Ms. Harris repeatedly and explicitly advised that she did not engage in any discussions with Mr. Gilstrap or other leadership about this issue.³⁴ Although she did participate in a lengthy interview for this Review, when requested to participate in a second

³¹ Exhibit 18

³² Exhibit 19

³³ Exhibit 20

³⁴ Exhibit 21

interview to follow-up on additional information, Ms. Harris did not respond to the Reviewer's requests to do so, even following reported outreach from central office staff.

As the principal of HHS during the 2022-2023 school year Mr. Gilstrap had ultimate responsibility for all activities and processes in the HHS building. Mr. Gilstrap was supervised by a Principal Director, though during most of the 2022-2023 school year the Principal Director position was vacant, and responsibilities of the Principal Director were covered by Mr. Jefferson, the Chief Academic Officer, who still retained numerous other roles and responsibilities. Mr. Jefferson described Mr. Gilstrap's status as principal at HHS during 2022-2023 as "checked-out." He was further described as a principal who didn't provide leadership and direction to building staff, took a laissez-faire approach to managing the building, and who admit to Mr. Jefferson that "he was not fully present" in the role and was looking for another job.³⁵ Mr. Jefferson also advised that although Mr. Gilstrap's disengagement came on his radar in about April or May of 2023, other crises in the division at another high school caused HHS to be a "second priority."³⁶

The Reviewers made several attempts to interview Mr. Gilstrap, who is no longer employed with RPS. After several email communications, Mr. Gilstrap responded that he was seeking legal counsel and would decline the interview. No further communications have been received from him.

Known Security Issues

During the 2022-2023 school year, the Student received homebound instruction. Numerous staff interviewed advised that prior to the graduation they were aware of safety and security issues surrounding the Student. Most notably, Ms. Harris, the Student's Counselor was advised of the following by the Student's mother:

- 11/15/21: Mother advised the Counselor that the Student and family were in hiding because of the incident with one of his friends. The Counselor responded, "I am aware of the incident...reach out to Mr. Olds or Mr. Gilstrap regarding your safety concerns...."³⁷
- 6/8/22: Via email, the Mother advised the Counselor, Principal Gilstrap, and copied Superintendent Kamras that "we are still homeless from our home being shot up, by students in Huguenot."³⁸
- 6/13/22: The Counselor wrote to the Mother, "I know you had some concerns regarding [Student] attending school in person due to the threat of neighborhood violence."³⁹

³⁵ Exhibit 20

³⁶ Exhibit 20

³⁷ Exhibit 59

³⁸ Exhibit 22

³⁹ Exhibit 23

- 9/7/22: The Counselor wrote to the RVA Principal, “He is on homebound due to the ongoing mental health issues as well as the threat of neighborhood violence stemming from his association with another student that was involved in a crime.”⁴⁰
- 1/31/23: Regarding the Student doing testing in person at HHS, the Mother wrote to the Counselor, “[Student] have some kids their (sic) that I don’t need him having contact with...so just throwing him in there at a time when kids are still arriving to school, is very unsafe.”⁴¹
- 2/2/23: After the Student was in the HHS building to take a test, the Mother emailed the Counselor stating, “I thought when [Student] came there to test he would be isolated. He was in the class with people who literally tried to kill him.... Those kids could have had somebody in the parking lot waiting to follow him or anything.”⁴²
- 5/30/23: Mother asked the Counselor if Student would participate in graduation rehearsals or if Counselor would just squeeze him in during the graduation ceremony. Counselor advised, “I will just squeeze him in if you feel that it’s too dangerous.”⁴³

Failure to Assess and Share Information

In addition to the Counselor having this information and apparently not sharing it to inform any needs or threat assessment, other RPS staff reportedly were aware of the safety and security issues involving the Student. As reported above, the June 8, 2022, email was copied to the HHS principal and the Superintendent. Follow-up email show that the Superintendent forwarded the email to the Director of Secondary Success Pathways, Ms. Laura Faulcon, and that Ms. Faulcon, sent guidance to the HHS team (Principal Gilstrap, Counselor Harris, and Lead Counselor Harrison) to provide the Student and family with support.⁴⁴ The email chain noted above does not show any response, feedback or support from the HHS Principal Gilstrap. In response to the push from Ms. Faulcon and the Superintendent, the Counselor, Ms. Harris, did offer support regarding homebound for the Student. However, nothing in the email chain demonstrated referral of this information to any security personnel inside or outside RPS attendant to the apparent security issues associated with one HHS student’s home allegedly being “shot up” by other HHS students.

In her interviews with the Reviewer, Ms. Harris advised that she had previously discussed the security issues related to the Student with the prior Assistant Principal, Mr. Kevin Olds, during the 2021-2022 school year. She further advised she had once sent the Student to Mr. Olds and Mr. Gilstrap for support following the Student being involved with a friend who had shot and killed another person. Ms. Harris advised that, around this time, the Mother began to request that the

⁴⁰ Exhibit 24

⁴¹ Exhibit 25

⁴² Exhibit 26

⁴³ Exhibit 27

⁴⁴ Exhibit 22

Student not be required to come to school in person, due to safety issues. If any action was taken by Mr. Olds or Mr. Gilstrap to address any of these security issues, the records provided for this Review do not evidence that. Though still an employee of RPS, Mr. Olds failed to respond to several email from the Reviewers requesting an interview, despite reported outreach from central office leadership.

When interviewed for this Review, HHS Lead Counselor Harrison, acknowledged that she was also aware of safety and security issues related to the Student. Although designated as Lead Counselor, Ms. Harrison did not supervise the decision-making or caseload of the other five HHS counselors, but rather acted as more of a project manager for the counselor team. She advised, and others interviewed agreed that the building Principal was responsible for the actual supervision of the counseling team.⁴⁵ Even though Ms. Harrison participated in weekly Student Pathways and Performance (“SPP”) meetings convened by the HHS graduation coach, Mr. Sanchezconcha, and attended by other HHS counselors, social workers and an occasional central office representative throughout the 2022-2023 school year, Ms. Harrison could not recall raising for discussion, and had no recollection of anyone else ever raising for discussion this Student, his needs, and potential security issues related to him. This was true despite Ms. Harrison advising that these meetings were vehicles to discuss “any issues related to [a senior student]” and that “if you wanted to bring up a specific student and challenges that was, you know, a format for you to do so.”⁴⁶ Ms. Harrison further advised that “just he wasn’t on my caseload.”

When interviewed, Mr. Sanchezconcha confirmed that, to his recollection, neither this Student, nor safety and security issues related to him, were ever topics of discussion in the SPP meetings he convened each week. He stated however, that these meeting would have been the platform for such a discussion.⁴⁷

Additionally, when interviewed, three HHS CSAs who were also present at the June 6, 2023, graduation stated that prior to June 6 they were either not aware of the Student at all, or only knew informal information about him which they had heard from other students.⁴⁸ Despite having as one of their essential job duties the responsibility to 1) “work collaboratively with school-based staff including school administrators to identify and address safety concerns”; and, 2) “serve as a member of both school-based threat assessment teams and school culture and climate teams, no HHS CSAs received any of the information cited above detailing the safety and security issues related to the Student.

Threat Assessment Protocol

In accordance with state requirements that “each school board shall adopt policies for the establishment of threat assessment teams, including the assessment of and intervention with individuals whose behavior may pose a threat to the safety of school staff or students” in the 2022-2023 school year, RPS had in place a Behavioral Threat Assessment and Management Handbook

⁴⁵ Exhibits 20 and 28

⁴⁶ Exhibit 29

⁴⁷ Exhibit 9

⁴⁸ Exhibits 30, 31, 32

(“Threat Assessment Handbook”).⁴⁹ Page two of the Threat Assessment Handbook identifies “staff” as mandated reporters for “report of threatening behavior, statement or actions.” The Handbook further defines threat as “any communication or behavior that indicates an individual may pose a danger to the safety of school students or staff through acts of violence or other behavior that would cause harm to self or others.”

Despite the existence of the threat assessment policy and its guidance which advises that once a potential concern is reported to a mandated reporter, the threat assessment team is expected to “ensure that immediate safety threats are mitigated, and any other necessary crisis response have been initiated. Team then engages in intake and triage.”⁵⁰ Despite Ms. Harris, Ms. Harrison, Mr. Olds and Mr. Gilstrap being aware of information [REDACTED], this Review did not identify any such vetting took place related to any of the known safety and security issues related to the Student.

When as referenced above, on February 2, 2023, when the Student came to the HHS building to take a test, the Mother immediately emailed Counselor Harris that the Student had been placed in “class with people who literally tried to kill him....Those kids could have had somebody in the parking lot waiting to follow him or anything.” Though meeting the definition of a threat under the threat assessment policy, Ms. Harris, a mandated reporter under the policy, did not report this information to an administrator to initiate a threat assessment. When asked what actions she took following receipt of this email the following exchange took place:⁵¹

Reviewer: How did you know that [Student X] was the student in that room that he had a problem with?

Harris: Well, I did think on it, it was basically by process of elimination because he was the only other black student in there.

Reviewer: And then after you, did you communicate that after, after you became aware through whatever process you, you used to figure out that that was the student? Did you communicate that to anybody that, hey [Student X] and [the Student] have issues?

Harris: Um No, because there was really no way for them to come in contact with each other based upon um the situation in the building.

Reviewer: Um, but what do you mean by that?

Harris: Because the Student wasn't coming in the building, only for testing. And um I mean, well, Ms. Baron-Rojas [testing coordinator] and I talked about it. Um and after that was when we decided that we would just, it would, he would be in a room by himself and nobody would be in there.

⁴⁹ Exhibit 33

⁵⁰ Exhibit 33

⁵¹ Exhibit 21

- Reviewer: So other than you and Ms. Baron-Rojas talking about it and then putting in place um protocol test, put in place test-alone protocol. Did you communicate that to anyone else at HHS or on the division level?
- Harris: Um I don't recall. Um and also doing that email that mom, since she also stated that she was working with Richmond Public Schools to get him transferred um to another school. So I know that with that process you work with the safety and security department to do that. Um so I, I guess I assumed that whatever concerns she had she shared with them.
- Harris:⁵² But with this incident on the second [of June], um when she said that she was already in communication with them to move him to another school, then um I didn't share that because I know that in order to be able to go through the, to have it done, you have to contact safety and security.
- Reviewer: And so, as time went on, [Student] is not being transferred to another school or getting off your rolls, did you do it? Did you think, let me, well, he's still here. He's not going anywhere. Let me make sure everybody knows that at least as it relates to [Student X] it's a keep-separate kind of thing, or anything like that. Did it ever, did you ever like change your thinking about that once he didn't transfer?
- Harris: Um No, because I knew that the, I felt like the process that we put in place would eliminate them from having any contact and, and, and like I said, that also is just assuming that that's the person that he had the issue with because he never said who the person was.
- Reviewer:⁵³ Um, if with [the Student] coming to graduation, was there a plan in place in regard to contact for that [with Student X]? Um, I'm assuming they were in alphabetical order, but they would have been in the same place at the same time.
- Harris: Oh, well, there wasn't a plan to eliminate him, having contact with him based upon, um, that because, um, like I said, it was just an assumption that that was the person who it was. Um, and, um, being that with what with what we do for graduation and the way that the students are lined up, the students are seated, the students are supervised and they proceed. It would have been minimal, little to no opportunities for them to, to, to come in contact with each other at all.

⁵² Exhibit 21

⁵³ Exhibit 21

Reviewer:⁵⁴ Um Can you tell us a little bit about that because I mean, when it comes to, um, we weren't just talking about a physical altercation. Um, this was a little bit, um I mean, the mom's accusations where they tried to kill him. So what was set up that you, there wasn't a concern about them all being at the graduation?

Harris: Um, the students come in, they're checked in, they uh get a name card, they have a seat in, in their alphabetical order. They sit there. Um, there are 20 to 25 staff members. There's uh our school resource officers there, our school um um, care and safety officers are there. Um, admin is there, they sit um in their assigned spot until it's time for them to stand up. They line up and then they walk directly upstairs, proceed into graduation, and sit down and they're actually at graduation.

Reviewer: Like you're saying, SROs are there, CSAs are there, administrators there, they sit in their assigned spots, all of those things you just said, do any of those folks there know, did any of those folks there know about the [Student] and [Student X] conflict based on information that you provided to them.

Harris: Um Like I said, I'm not sure if, if Mr. Olds was aware because I can't say, I, I can't say definitively that we talked about it or not.

Based upon the above statements, it is clear that no threat assessment protocol was initiated by Ms. Harris, a mandatory reporter according the RPS threat assessment policy, following this incident. Additionally, no information was reviewed which suggests that Ms. Harris appreciated or expressed concern about the Student attending the HHS graduation with Student X, whom the Student's Mother advised had "literally tried to kill him."

[REDACTED]

As detailed above, the evidence reviewed does not demonstrate any safety and security intelligence gathering in preparation for the June 6 graduation. Where there was intelligence available, the evidence reviewed for this report indicates that it remained siloed with those who did not act upon it to inform graduation preparations.

[REDACTED]

⁵⁴ Exhibit 21

Security at the Altria

As previously discussed, the Altria Agreement included payment for and provision of magnetometers for the graduation ceremonies. According to Ms. Fecht, who coordinated the RPS security planning, there were three designated points of entry as detailed on photo #1. As depicted below, The “Front Entrance” which was on the Laurel Street side of the venue, was for general entry of guests and ticketholders. The “Graduate Entrance” was on the Main Street side closest to the Main Street sidewalk. The “VIP Entrance” was located to the rear of the Altria loading dock along Cherry Street.

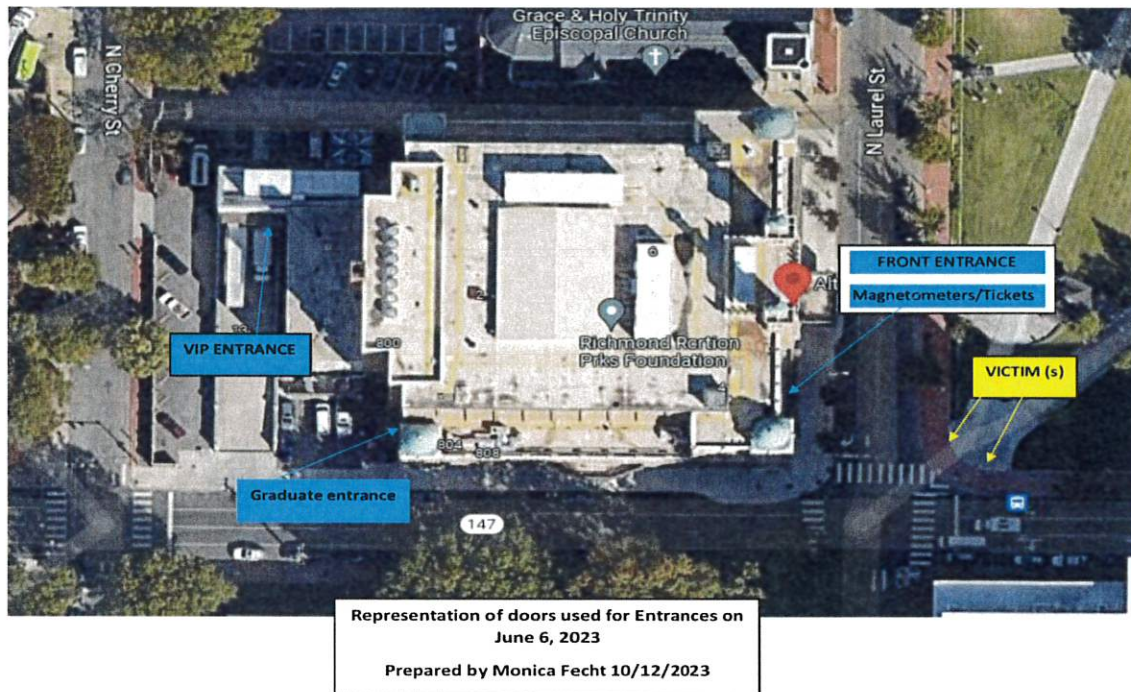


Photo 1

All information reviewed indicates that ticketholders entered only through the Front Entrance, and that this entrance was at all times equipped with magnetometers. Staff, graduates, and dignitaries, on the other hand, are reported to have accessed the building through doors other than those designated for their entry. Although five School Board members attended the HHS graduation, of the three interviewed for this review, none reported entering at the rear VIP Entrance.⁵⁵ All reported entering through the Graduate Entrance.⁵⁶ For this review, no information was received indicating whether the dignitaries ever received information directing them to utilize the VIP Entrance. However, a document was provided labeled “Notes from Altria Walk-thru on 4.5.23” which detailed the following⁵⁷:

⁵⁵ Exhibit 34

⁵⁶ Exhibits 35, 36, 37

⁵⁷ Exhibit 16

- Staff working the event and VIPs will enter from the door near the back of the loading dock (School board members can enter from the front door if they choose but will be subjected to being searched)
- Working staff and dignitaries will enter from the door near the loading dock, this door can also be used by VIPs & we will need to have someone at the door to direct them to the Ferrer Lounge

Whether this logistical information from the April 5, 2023, walk-through was communicated to the five School Board members and other dignitaries in attendance is not known, and as noted the three School Board members interviewed and Mr. Solomon Jefferson, entered through the graduates' entrance. Though not reported to have been used for ingress and egress at this event, the VIP entrance was not equipped with magnetometers, but was supposed to be attended by an RMC staff member to check credentials.⁵⁸ Because no one interviewed used this point of entry, it is unknown who, if anyone, was posted at the VIP entrance.

Related to security, one fact is consistently reported. Only one RMC employee staffed the graduates' entrance prior to the 4:00 p.m. start time for the HHS graduation.⁵⁹ The employee was described as an older male.⁶⁰ This sparse staffing existed though all planning anticipated at least 310 graduates would use this point of entry in the hour leading up to 4:00 p.m.⁶¹ The additional dignitaries and staff utilizing this entry-point did not appear to have been contemplated in the security planning.

In this review, there emerged differing narratives of whether magnetometers were in place at the graduates' entrance. Dr. Stephanie Ramsey, RPS Coordinator of Health and Athletics, who advised she was not originally assigned to work at the HHS graduation, reported that the graduates' entrance was equipped with a walk-through magnetometer. Dr. Ramsey's assignment that afternoon was to greet school personnel and dignitaries, and help them get to their assigned locations. Dr. Ramsey advised that she observed the walk-through magnetometer in place when she arrived late to the venue (about 3:15 to 3:30 based upon her report of staying at the venue for 45 minutes and leaving immediately after the ceremony began at 4:00). According to Dr. Ramsey, by the time she arrived at the graduates' entrance, most graduates had already passed through the entry point, but some students and dignitaries did enter after her arrival. Additionally, she advised that she was not in position to see if everyone who entered was screened by the magnetometers because she left the entry point several times to escort people to other areas. Of note, Dr. Ramsey recalled escorting a reporter from the Washington Post to Mr. Gilstrap prior to the start of the ceremony. She reported that this reporter had been shadowing Mr. Gilstrap for some time. Furthermore, Dr. Ramsey reported that she had worked the entire Richmond Community High School graduation earlier that day and also had been assigned to the graduates' entrance. She recalled, in contrast, that at the Community graduation no walk-through magnetometer was in place, but rather those who used the graduates' entrance were "wanded."⁶²

⁵⁸ Exhibit 12

⁵⁹ Exhibits 20, 9

⁶⁰ Exhibits 37, 28, 9

⁶¹ Exhibit 38

⁶² Exhibit 39

Mr. Lyons Sanchezconcha reported that upon his arrival at the venue at approximately 2:15 p.m. he was possibly the third staff member to arrive. He reported observing a yellow-shirted RMC staffer, who was an older male, attending the graduates' entrance. He advised that, as the graduation coach he passed through that entry point many times prior to the ceremony to bring in regalia and other items. During his many entries and exits via the graduates' door Mr. Sanchezconcha advised that he observed and passed through the stationary magnetometers. Mr. Sanchezconcha advised that he went out the graduates' entrance as late as 4:00 p.m. to assist a late-arriving female student and observed the magnetometers still in place, though he and the student re-entered through the Laurel Street entrance where the Student was screened.⁶³

Mr. Kevin Monroe, HHS Assistant Principal since April 2023, reported that when he arrived at the Altria just before 3:00 p.m. on June 6, he entered at the graduates' entrance. While he reported that he did observe and walk through a stationery magnetometer at the entrance, he noted at the time that the magnetometer "should have went off, but it didn't," even though he was wearing a watch and belt, and was carrying a cell phone in his hand when passing through. He further advised that no one conducted a further search of him as he entered, and although he had his RPS ID badge, no one checked it.⁶⁴

In addition to the reports from Dr. Ramsey, Mr. Sanchezconcha, and Mr. Monroe, School Board member Jonathan Young, and CSA Brigitte Flowers both report seeing stationary walk-through magnetometers at the graduates' entrance.

Mr. Jefferson, who also had attended the Community graduation that morning, returned to the venue and entered through the graduates' entrance at approximately 2:00 p.m. At that time, he reported, the door was unlocked, and no RMC security personnel was in place, but that an RPS staff member (not a CSA) was at the door. Mr. Jefferson reported that he re-entered the venue without seeing any "metal detectors" and was not wanded as he had been for the earlier ceremony.⁶⁵

Though entering through the graduates' entry at different times for the HHS graduation, School Board members, Dr. Shonda Harris-Muhammed and Ms. Stephanie Rizzi also did not recall seeing magnetometers in place. Dr. Harris-Muhammed advised that she attended both graduations that day. When she arrived for the HHS graduation, she observed no school staff at the graduates' entrance but noted that Dr. Ramsey "was enroute to the door." Before the ceremony started, when Dr. Harris-Muhammed left the building and re-entered through the graduates' entrance on two occasions she saw one RMC staffer monitoring the door entrance, but did not observe a magnetometer. On one re-entry Dr. Harris-Muhammed reported entering with a graduate whom she congratulated before she observed the graduate enter and go to the right and down once inside, while Dr. Harris-Muhammed entered and went to the left and up once inside. During this re-entry Dr. Harris-Muhammed advised neither she nor the student received a security screening.⁶⁶

⁶³ Exhibit

⁶⁴ Exhibit 28

⁶⁵ Exhibit 20

⁶⁶ Exhibit 37

Ms. Rizzi reported that she arrived a bit late to the venue, just a few minutes before 4:00, and entered through the graduates' entrance. She reported that she did not see anyone in a security role at the door, though she did observe some "kids" entering. Ms. Rizzi also reported that she did not see any magnetometers in place as she entered through the doors and went to the left and upstairs to the staging area for the dignitaries.⁶⁷

Given the conflicting reports of whether there were magnetometers in place at the graduates' entrance, review of video footage of the entrance could have assisted in this review. When the Review Team conducted an exterior walk-around of the venue on October 13, 2023, it was observed that a camera appears to monitor the graduates' entrance. However, because neither the Altria nor RMC staff cooperated with requests for information for this review, we cannot advise whether video footage could resolve the differing reports.

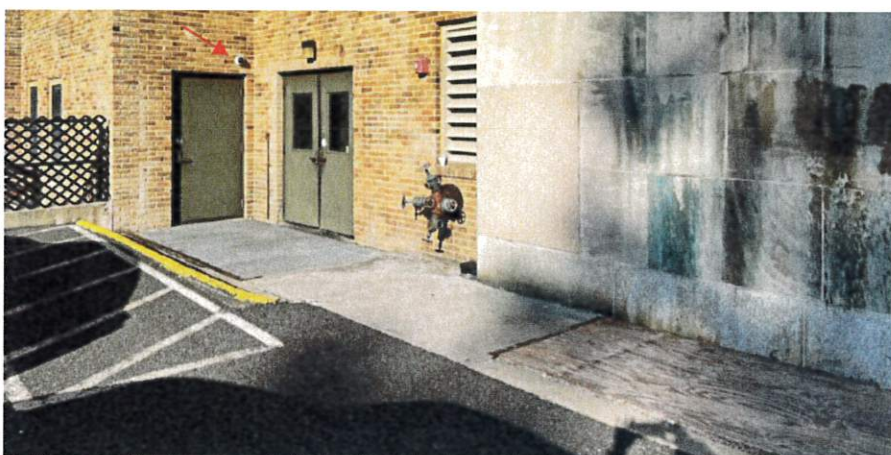


Photo 2

The Ceremony

After students entered the building they were required to assemble in the ballroom prior to procession into the theatre upstairs. In the ballroom the students were lined up in alphabetical order, provided index cards on which to write their names, and given time and staff support to organize their caps, gowns, regalia and attire before processing into the auditorium. Several staff were in the ballroom to assist the students.⁶⁸ This included Mr. Sanchezconcha, Mr. Monroe and CSAs Ms. Brigitte Flowers and Ms. Peggy-Anne Morris. Other staff report floating in and out of the ballroom while the students were assembling.

No staff report seeing the Student in the ballroom. However, Mr. Kevin Monroe, the HHS Principal since April 2023, affirmatively stated that the Student was not initially in the ballroom for preparations.⁶⁹ Though only at HHS since April, Mr. Monroe had met the student one time prior to the graduation when the student used Mr. Monroe's conference room for testing at HHS. Mr. Monroe advised that the Student could not have been in the ballroom until moments before

⁶⁷ Exhibit 36

⁶⁸ Exhibits 9, 28, 40

⁶⁹ Exhibit 28

the procession upstairs, based upon information that Mr. Gilstrap shared with Mr. Monroe, following the graduation. Mr. Monroe advised the following:

But talking to um Mr. Gilstrap, he did, he came down there, he came down there late, later than like when we, yeah, because Mr. Gilstrap talked to him on the way in. He said, well, Gilstrap told me that he had talked to him on the way in...said he had talked to [the Student] on his way in. Yes, that Gilstrap saw [the Student] and spoke to him when he, when [the Student] was comint in and he had come in late, like everybody was kind of down there and then he came in, he got in, came in a little late.

Did he say how he came, where he saw him, or how [the Student], where [the Student] entered from?

No, no, but he said he shook his hand and spoke to [the Student], spoke to him and he, he went in. So I guess when he came in, he got, they would have already been setting up. So he probably just found his spot and jumped in the line.

Additionally, CSA Ms. Brigitte Flowers, reported that she was moving around the ballroom helping students assemble, and did not see the Student in the ballroom. She did report however, observing the Student walking through the lobby after the students had processed into the auditorium moments before the ceremony began. Ms. Flowers further advised that although she did not see the Student's point of entry, when she observed him in the lobby, he was accompanied by an older white male with a beard. The Review Team could not confirm through an additional source the identity of the white male seen walking with the Student just prior to the ceremony, but when shown a picture of Mr. Gilstrap, Ms. Flowers advised that he was the man she saw with the Student.⁷⁰ Though Ms. Flowers' observation was not able to be verified through another source, at the Altria Ms. Flowers was assigned to the front lobby area at the time she made her reported observation.⁷¹

The graduation video also supports that the Student made a late arrival to the Altria. In the video it can be observed that when the students whose names start with the letter "j" are called, the student comes on stage, presents his name card to the announcer, and is announced out of sequence. The sequence of the names called were "G. Jackson", "O. James", and then after a pause of 28 seconds and the reshuffling of diplomas by Ms. Harris and Mr. Gilstrap, the Student appears on stage and then his name is read.⁷²

This late arrival is consistent with the Mother's email to Ms. Harris at 2:54 p.m. on June 6, 2023, which advised: "[the Student will be in like 3:30 letting him calm down]." Ms. Harris advised that she did not see this email until several days after the graduation.

The Procession Out

⁷⁰ Exhibit 40

⁷¹ Exhibit 41

⁷² Graduation video, 1:04:26-1:05:22

At the conclusion of the graduation ceremony, the procession out was led by the dignitaries and staff from the dais, who assembled at the Laurel Street exit in a “tunnel” formation. This formation was planned to allow the graduates to pass through and be greeted by those who had been on the dais. Once the dais participants were in place in the tunnel formation, stretching from the vestibule out to the sidewalk along Laurel Street, the graduates began their procession out of the Altria, exiting each row in the alphabetical order in which they had been called to the stage, starting with “As” and ending with “Zs.” According to the security plan, all students, and the families were required to exit “towards Monroe Park” across Laurel Street.⁷³ CSAs were assigned to stay inside the Altria while the Students and staff processed out to retain guests until all students had exited the building. After the students exited, the guests also exited toward Monroe Park.

According to the graduation planning, approximately 3,600 people were expected to exit onto Laurel Street toward Monroe Park at the same time. With the 22 CSAs and CSA supervisors assigned responsibilities inside the venue at release, and RMC staff assigned to provide only building security upon entry and inside the venue, the only security or emergency response presence outside the venue was an off-duty RPD staff of 5, and an off-duty Fire/EMS staff of 3.⁷⁴ That amounted to a ratio of 1 security personnel for each 780 expected persons exiting toward the park, and a ratio of 1 Fire/EMS personnel for each 1300 persons exiting.

Following the incidents that took place in Monroe Park, all persons interviewed for this review reported that the immediate emergency response fell to RPS CSAs, teachers, administrators, and dignitaries. Their actions included securing the Altria doors, assisting those injured by the shooting, assisting those injured by the stampede of people running away, assisting the elderly and infirm, reconnecting those separated from their family, and supporting those who sought shelter inside the Altria. Notably, an HHS counselor was among the first to perform CPR on one of the deceased; a School Board member shielded the injured from those attempting to take live video; and CSAs and RPS staff helped persons shelter in place and then reconnect with loved ones once the scene had been secured.

II. To report to the School Board any findings that include written statements from RPS Division staff and HHS staff involved with the June 6 graduations preparations of all graduations on June 6.

Review of Written Statements

In order to conduct this review, on October 18, 2023, the Reviewers requested that RPS leadership provide us with any “statements made by staff about the June 6 event.”⁷⁵ In response we received only two statements from RPS that are reviewed below. A third statement, which is presented as a part of the RPS Monroe Park Shooting Report dated July 20, 2023, (“RPS Report”) is also reviewed below.

⁷³ Exhibit 42

⁷⁴ Exhibit 43

⁷⁵ Exhibit 44

First, the following statement made by Dr. Ramsey was provided to the Reviewers by RPS:⁷⁶

From: Ramsey, Stefanie <sramsey@rvaschools.net>
Date: Thu, Jul 6, 2023 at 10:32 AM
Subject: HHS statement
To: Jason Kamras <jkamras@rvaschools.net>

Morning Jason

On June 6th at Altria I volunteered at the rear entrance of the building to assist with staff and student intake. During my time at the entrance for Huguenot Staff and Students, I witnessed each student walking through the metal detector to enter the building.

Please let me know if I can be of any other assistance.

--

Stefanie C. Ramsey, Ed.D.
RPS Coordinator for Athletics, Health & PE, Driver Education
2120 Fendall Ave
Richmond, VA 23222
sramsey@rvaschools.net
Resilience. Pride. Success. #WeAreRPS

During our Review, Dr. Ramsey affirmed the above statement when interviewed on October 18, 2023. However she did provide the following additional clarifying details during her interview: 1) that she arrived late to the graduates' entrance; 2) that most graduates had already entered by the time she arrived; 3) that she was away from the entry during the time she escorted dignitaries; 4) that she left just as the ceremony started; and, 5) she was at the venue for no more than 45 minutes.⁷⁷

Second, in the initial production of documents provided by RPS, included was a statement from John Beazley, RPS Director of Safety and Security, dated October 5, 2023. This statement summarized the CSAs' role in the graduation ceremony on June 6.⁷⁸ Other than providing details about documents collected by his staff for this review, the only statements made in this document were the following:

Currently there are no written policies or protocols dictatacting (sic) staffing requirements or procedures for security for school events.

It is important to note in previous years, when using the Altria theater for graduations, the same procedures were followed. The staffing from RPS was to supplement what was required of the venue and was focused on addressing issues with attendees inside the venue.

Mr. Beazley's statements were not contradicted in the course of this Review.

⁷⁶ Exhibit 45

⁷⁷ Exhibit 46

⁷⁸ Exhibit 47

Review of Statement in the RPS Report

Finally, the Reviewers chose not to receive or review the RPS Report until most information for this review had been received and reviewed, so that this Review would not be guided by or merely responsive to the RPS Report. When the RPS Report was received and reviewed by the Review Team on October 18, 2023, one statement in the report required response in this Review. The RPS Report provided the following statement:

Acting as Principal Gilstrap's designee, Ms. Harris approved Shawn's participation. In doing so, Ms. Harris took into account two factors. First, she had observed Shawn when he came to Huguenot for in-person SOL testing. She found him to be in good spirits and emotionally well. Second, she was compelled by Mrs. Jackson-Smith's own observations that Shawn had been improving and her conviction that he was emotionally able to participate.⁷⁹

Although written in the RPS Report, RPS did not provide this Review Team any document, recording or other source material which provides the foundation for this conclusion. It is not known whether Ms. Harris was interviewed in support of the RPS Report or whether the conclusion was drawn from other source material.

However, when the Review team interviewed Ms. Harris, quite a different narrative was drawn. When asked whether she had any communications with the principal regarding the Student's participation in the June 6, 2023, graduation ceremony, the school counselor advised that she never had a conversation with the principal about approving the Student to participate in any school sponsored activity, including the graduation ceremony.⁸⁰ Ms. Harris stated the following:

Reviewer: Um Did you have any conversation with or was there a meeting in which Sean's status, either as a homebound student or, or academically was a subject of discussion for whether or not he should physically walk at the graduation? I mean, we've talked about the academic and that you said that that was all covered once he completed that enterprise, um which was May 27th.

Harris: No.

Reviewer: So there were no conversations about whether he should physically walk?

Harris: No.

Reviewer: And as far as you knew, was there any process that you needed to be involved in to say he's a home... I have this home bound student.

⁷⁹ Exhibit 48

⁸⁰ Exhibit 21

I need to go through this process to make sure he's permitted to physically walk?

Harris: No.

Reviewer: So you weren't aware of one or there...you didn't conduct a process like that?

Harris: I was not aware of one.

It was Ms. Harris' stated position that not only did she not engage in an approval process as the principal's designee, she concluded: "it kind of seemed like it was up to if the student was well enough to participate um if they wanted to participate, but there's nothing concrete that says that they cannot or that they have to meet some type of criteria in order to participate." Additionally, when asked about her understanding of the Home Instruction Manual provision which advised that a student could only participate in school-sponsored activities if approved by the principal or his designee, Ms. Harris expressed that in hindsight, she *now* understood that there needed to be an approval process. She stated:

Reviewer: Does it sound like it's [the Handbook] saying that the principal needs to...needed to approve participation in graduation since we agree that that's a school-sponsored activity.

Counselor: Um, I guess, um, but the print, I mean, well, I, yeah, I guess, yes, in hindsight.

Reviewer: And was there ever any query that came to you as the 12th grade counselor...just, uh, and so we're talking, from you going up, or from the principal coming down saying, ok [Ms. Harris], you've got a homebound student on your, on your roster....He's graduating, tell me about him so I can do this process called approving him to participate in a school sponsored activity. Did that kind of conversation ever take place?

Counselor: No.

Reviewer: And would there have been awareness from the, by the principal either through something you generated or just conversations or regular meetings that the principal would know that you had a homebound kid projected to graduate?

Counselor: Yes.

Reviewer: And how would he have known that?

Counselor: Well, we all have access to the graduation tracker.

It is important to note the Review Team conducted the interview of Ms. Harris on October 17, 2023, one day before receiving and reviewing the RPS report. Following the team's review of the RPS Report, the team repeatedly sought to re-interview Ms. Harris to attempt to reconcile the two different narratives which emerged from the RPS Report and our interview. Ms. Harris did not respond to the Review team's repeated requests for a follow-up interview, even when RPS leadership reportedly attempted outreach in support of our requests for the follow-up interview.

Based upon the above information and lack of reconciliation of two clearly opposed narratives, this Review cannot affirm the RPS Report's statement that Ms. Harris acted as the Principal's designee who made the decision to allow the Student to participate in the June 6 graduation ceremony.

III. Include in the third-party review, the breakdown of our homebound process and procedures that directly impact grading.

The Homebound Process within RPS during the 2022-2023 School Year

Virginia Regulations Establishing Standards for Accrediting Public Schools in Virginia, at 8 VAC 20-131-180 "Off-Site Instruction," [REDACTED]. The regulation sets out the following:

Homebound instruction shall be made available to students who are confined at home or in a health care facility for periods that would prevent normal school attendance based upon certification of need by a licensed physician or licensed clinical psychologist.... Credit for the work shall be awarded when it is done under the supervision of a licensed teacher qualified in the relevant subject areas and employed by the local school board, and there is evidence that the instructional time requirements or alternative means of awarding credit adopted by the local school board in accordance with the provisions of 8VAC20-131-110 have been met.... For courses offered for possible high school credit, standard units of credit shall be awarded for successful completion of such courses when the course is equivalent to that offered in the regular school program and the work is done under the supervision of a licensed teacher qualified in the relevant subject areas.⁸¹

During the 2022-2023 school year, home instruction services for RPS students were provided through the Richmond Virtual Academy ("RVA") program.⁸² Initially, RVA was a program supporting schools, not a school itself, created to provide virtual schooling to RPS students in response to the Covid-19 Pandemic. With the introduction of RVA, and coincident with RPS budget cuts, RPS transitioned the Home Instruction Program from the RPS central office to reside under the umbrella of the RVA program. In this new structure, home instruction services were made available to RPS students division-wide through RVA⁸³ The administrative impact of this change was the down-grading of home instruction from central office oversight, to less than

⁸¹ Exhibit 49

⁸² Exhibit 50

⁸³ Exhibit 51

principal-level oversight.⁸⁴ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

It should also be noted that prior to the 2022-2023 school year, homebound students generally received ten hours per week of homebound instruction. At or around August 2022, the home instruction office experienced the loss of many home instructors. As a consequence, homebound students would thereafter receive two hours of instruction per core academic subject per week. [REDACTED]

[REDACTED]. For example, a student enrolled in only one math and one science course (both core content courses), would receive four hours of instruction per week. No instruction was provided for homebound students for elective courses. Because the homebound program is designed as a temporary program to accommodate the needs of students while they are confined to the home for medical reasons, the Home Instruction Coordinator emphasized that homebound is not a comprehensive educational program.⁸⁵

The RPS Home Instruction Handbook

In the 2022-2023 school year, RPS maintained a “Home Instruction Services Parent/Teacher/Student Handbook” (“Handbook”).⁸⁶ The Handbook was issued by the RPS Home Instruction Coordinator under the management of RVA. By its introductory language, the Handbook was intended to provide parents, students, and teachers with “basic information that will be valuable to you as your family navigates the homebound or home-based services program.”⁸⁷ The Handbook details eligibility for homebound instruction consistent with 8 VAC20-131-180. It also details restrictions that apply to homebound students. Among other restrictions, the Handbook provides that homebound students may not 1) Be on school property; or, 2) attend school-sponsored activities at any time during the time approved for services without permission of the school principal or his/her designee.⁸⁸

Though the Handbook is created and issued by RPS, central office leadership, the Home Instruction Coordinator, and school building staff all expressed different views about whether the Handbook was policy requiring strict adherence, guidance suggesting preferred practice, or something less. One central office leader advised that the above-cited homebound restrictions represented “suggested practice” not policy.⁸⁹ He further estimated that the number of principals who actually read the Handbook would “probably be zero because...it was just posted on the website.”⁹⁰ On the other hand, the home instruction coordinator advised that the above restrictions represent policy that required adherence.⁹¹ While some school building staff who were

⁸⁴ Exhibit 20

⁸⁵ Exhibit 51

⁸⁶ Exhibit 52

⁸⁷ Exhibit 52

⁸⁸ Exhibit 52

⁸⁹ Exhibit 20

⁹⁰ Exhibit 20

⁹¹ Exhibit 51

interviewed indicated awareness of the Handbook, they advised that actual practice left decisions about homebound students being on school property and attending school-sponsored activities to the building staff. In specific examples discussed during interviews, decision-making appeared to regularly occur without input from the school principal or a designee.⁹² Yet, another central office leader advised that in general all homebound students are to be tested “paper and pencil,” at their home with their homebound teacher, and not on school property. She further advised that the only exception to this is when a student needs to be tested to graduate, and then the decision is made between the building principal and the homebound department.⁹³

In sum, RPS personnel did not share the view that the Handbook’s restrictions were policy and/or procedure to which they must adhere. Furthermore, when asked, a central office leader affirmed that having such policies or suggested practices that are not known or read by those tasked with implementing them represented “a training issue [and] monitoring and oversight piece.”⁹⁴

The Homebound Certification Form

Another factor could contribute to the disparate views of which restrictions applied to homebound students in the 2022-2023 school year. The restrictions cited in the Handbook differed from the restrictions detailed on the Homebound Certification Form (“Certification Form”) which was required to be completed by doctors and submitted to the Office of Home Instruction by families applying for homebound instruction. Specifically, the Handbook communicated the following restrictions on student participation.⁹⁵

- May not report to a place of employment during school hours for the period approved for services;
- May not be on school property or attend school sponsored activities at any time approved for services without permission of the school principal or his/her designee;
- The student’s participation in school related extracurricular activities and non-academic activities will not be allowed when the student receives homebound or home-based placement.

However, restrictions on homebound students according to the Certification Form details the following restrictions on student participation:⁹⁶

- May not work;
- May not participate in extra-curricular activities;
- May not participate in non-academic activities (such as field trips);
- May not participate in community activities unless these activities are specifically outlined in the students (sic) medical plan of care or the IEP (if applicable).

⁹² Exhibits 21, 29

⁹³ Exhibit 53

⁹⁴ Exhibit 20

⁹⁵ Exhibit 52

⁹⁶ Exhibit 54

In the present case, no documentation or information was provided to the Reviewers to confirm whether the Parent received or was aware of the Handbook with its recitation of homebound restrictions. But, several email communications indicate that the Parent did participate in ensuring submission of the Certification Form to RPS, signed by the Student's medical provider, making it likely that she observed the restrictions on the Certification Form. Additionally, no information was provided to the Reviewers to suggest that RPS personnel made decisions based upon the guidance provided in the Certification Form. Though it cannot be determined which guidance, if any, supported the decision-making of HHS staff, the following did occur without any known approvals by and through the Principal or an announced designee, or through the Office of Home Instruction:⁹⁷

- Student was present on RPS property for testing on the following dates:
 - 2/2/23 EOC Reading (SOL)
 - 3/27/23 EOC Writing (SOL)
 - 4/27/23 Work Keys (Alternative Test for Writing SOL)
 - 5/11/23 Earth Science Examination
 - Student participated in person for the June 6, 2023, graduation ceremonies.

Whether RPS staff and the Parent made decisions based upon the guidance in the Certification Form or based upon that which was in the Handbook, or both, the discordance between the two sets of guidance must be noted [REDACTED]

Oversight of Homebound Students

As provided above, during the 2022-2023 school year, the home instruction program was facilitated by the RVA program. Because RVA was an RPS program and not a school, students receiving homebound instruction had their educational services, including core content curriculum development, counseling, graduation coaching, testing, and academic progress coordinated and directed by their home-zoned school. The Home Instruction Coordinator at RVA acted as the administrator of the home instruction program and was not involved in the instructional components of a homebound student's plan. The Home Instruction Coordinator explained her role during 2022-2023 in the following way:⁹⁸

Coordinator: So what I do is um I am the one that sends out the application when a uh family expresses interest or, you know, if there is

⁹⁷ Exhibit 55

⁹⁸ Exhibit 51

a need for homebound due to medical or mental health reasons um that, that prevents the student from attending school in person. I would now send them the application, they have it completed by either the treating um physician, medical doctor or by the treating psychologist or psychiatrist.

Um Once I receive that, it's reviewed to make sure that, you know, um everything a treatment plan is there if it's for a student that has mental health reasons, because again, um homebound is not meant to is not a comprehensive educational program. And so we work in partnership with the schools.

So once the application is approved, the family receives an approval letter, the school is is now um contacted so that they are aware that this student is going on homebound and I would be the one to assign an instructor also assign how many hours the student will be um receiving per week for homebound instruction.

And now after that, you know, um the school provides all of the instructional materials.

They work with our teachers, our homebound teachers to ensure that um our homebound teachers have instructional materials are added to the Google classrooms of um the students classroom teachers because the student remains connected to their home schools while they're on homebound.

Um especially since we're not running as AAA school.

So the students remain connected. Well, students that are in high school remain connected to their high schools and just receive that virtual instruction from our instructors.

As a result, application of this process during the 2022-2023 school year created the following structure for grading and tracking the academic progress of homebound students:⁹⁹

1. Home Instruction Coordinator assigned the student a homebound instructor;
2. The homebound instructor worked with the student's zoned-school teachers to receive curricular materials for the student;

⁹⁹ Exhibit 51

3. The homebound instructor provided direct instruction and guidance to the student using the curricular materials received from the zoned-school teachers;
4. The student completed classroom assignments through asynchronous learning, and submitted them through Aspen¹⁰⁰ to the zoned-school teachers;
5. The zoned-school teachers graded the student's assignments and posted grades to Aspen;

This arrangement did appear to confuse the Mother and complicate oversight of the Student's achievement and provision of services. For example, days before graduation the Student's grades, testing, coursework, and personal challenges placed him in jeopardy of not graduating. In the two weeks leading up to graduation, communications bounced back and forth from and among the Parent, HHS teachers, the Student's homebound instructor, the HHS counselor, and an HHS testing coordinator, in order to determine whether the Student would be eligible to graduate.¹⁰¹ In this process it was unclear whether the homebound instructor, the HHS classroom teachers, or the HHS counselor was responsible for the Student's curriculum development, progress and achievement.

Information Silos

██ when a student was placed on homebound, the reasons for the student's homebound status and the student's specific educational needs related thereto as prescribed by the treating physician in the Certification Form, are only officially known to personnel in the Office of Home Instruction.¹⁰² Personnel in the student's home-zone school who implemented the home instruction and coordinated the provision of educational services only knew information about the student's medical status if it was shared with them by the parents or students informally.¹⁰³

This information gap did contribute to the Student having academic demands placed upon him that were likely inconsistent with his present medical status. For example, in the Student's Certification Form the Student's physician cited as environmental factors that trigger the child's illness the following: "Adult/school authorities, big classroom setting; more peer interaction predispose (sic) to anger/emotional dyscontrol." Yet this information was not known to the HHS counselor, the HHS testing coordinator or the HHS teachers when the Student was repeatedly required to come into the HHS building to take tests. One such disconnect was apparent in the routine email sent to the Student on January 30, 2023, from the HHS Testing Coordinator who scheduled the Student to come into the HHS building for testing over two days, and assigned him

¹⁰⁰ Aspen is the student information system (SIS) utilized by RPS that collects, analyzes, and reports on student grades, attendance, and more.

¹⁰¹ Exhibit 56

¹⁰² Exhibits 51, 21, 29

¹⁰³ Exhibits 21, 29

Additional information gaps were noted. As detailed above, numerous email communications with Ms. Harris in the weeks leading up to graduation revealed that the Student was experiencing personal challenges related to his certified medical condition. No documentation indicates that this information was shared with the homebound instructor who was responsible for implementation of the Student's curriculum, the HHS teachers who provided the curriculum, received assignments, and assigned grades, or the HHS testing coordinator who scheduled the student's division testing. Additionally, there is no information which suggests that the Home Instruction Coordinator was made aware of the Student's increasing personal challenges leading up to graduation day. For example, following the Student receiving a failing grade on the Workplace Readiness Test, the Parent emailed the HHS counselor and advised, "[Student] said can he take the test over? He got a [failing grade], his head want (sic) in it after waiting and being anxious."¹⁰⁵ Other than to create an academic work-around for the test, no interventions for the Student are known to have taken place.

While there were many human resources involved in the Student's homebound process, the evidence reviewed revealed a process that was confusing and inefficient for parents, students, and staff. Additionally, the process appeared to have contributed to silos of important information being held and not shared or distributed with staff in a manner that could have optimized student achievement. This conclusion was supported by a member of RPS leadership who conceded that the RVA program/school services arrangement was not ideal for oversight of student achievement.¹⁰⁶

On November 13, 2023, Division leadership and the School Board received and reviewed the foregoing report in closed session. Thereafter, the Superintendent was authorized to provide a memorandum to respond to two discreet issues in the report. That memorandum is attached.¹⁰⁷

107 Exhibit 60