

The Regional School District 13 Board of Education Policy Committee met in special session on Thursday, May 21, 2026 at 4:00 p.m. in the library at Coginchaug Regional High School.

Policy Committee Members present: Mrs. Cowan and Mr. Roraback (arrived at 5:27)

Policy Committee Members absent: Mr. Moore, Mr. Konstantino, Mr. DelVecchio, and Mr. Simmons

Board of Education Members Present: Mrs. Petrella

Administration Present: Dr. Leggett, Superintendent of Schools and Mr. Brough, Human Resources Specialist

Mrs. Cowan called the meeting to order at 5:00 P.M.

### **Pledge of Allegiance**

The Pledge of Allegiance was recited.

### **Public Comment**

There was no public comment.

### **Approval of Agenda**

There was no motion to approve the agenda.

### **Approval of minutes – April 8, 2026**

There was no motion to approve the minutes.

### **Review Policies**

#### **A. FMLA 4151**

Mr. Brough proposed revisions to Policy 4151 regarding family and medical leave to align the district's policy with updated Connecticut law. The main change is the required incorporation of Connecticut Family and Medical Leave Act (CT FMLA) provisions, which were approved by the state last fall and primarily affect non-certified employees.

Mr. Brough highlighted key differences between Connecticut FMLA and federal FMLA. Connecticut FMLA has broader eligibility requirements, requiring only three months of employment, compared to 12 months under federal FMLA. Connecticut FMLA does not require a minimum number of hours worked, while federal FMLA requires 1,250 hours worked within a 12-month period. The definition of "family member" under Connecticut FMLA is much broader, including spouses, siblings, children, grandparents, grandchildren, and individuals related by affinity, whereas federal FMLA only covers spouses, parents, and children. Connecticut FMLA also provides an additional two weeks of leave for maternity-related

leave. Mr. Brough emphasized that the primary purpose of the revisions is to ensure the district policy complies with Connecticut statutes and better reflects the updated legal requirements.

Mr. Brough also proposed revisions to Policy 4151 concerning Family and Medical Leave (FMLA), focusing on how leave entitlement periods are calculated and how the policy distinguishes between certified and non-certified employees. Mr. Brough's recommended change would replace the current policy's use of a calendar year with a "rolling" 12-month period measured backward from the date an employee uses FMLA leave. Mr. Brough explained this has already been the district's longstanding practice and the policy should be updated to formally reflect it.

Mrs. Petrella questioned how the policy applied to certified and non-certified employees. Mr. Brough then clarified how the updated policy applies to different employee groups. Non-certified employees were already covered under federal FMLA, but the revised policy now explicitly incorporates Connecticut FMLA requirements for them. Certified staff, such as teachers, continue to follow federal FMLA guidelines. For non-certified staff, Connecticut FMLA takes precedence because its protections are broader.

Mrs. Cowan noted that the draft policy was difficult to follow because it intermingled provisions for certified and non-certified employees. Mrs. Cowan suggested reorganizing the policy into clearer sections separating federal and Connecticut FMLA rules. Dr. Leggett referenced a comparison table, previously created by Mr. Brough, that outlined differences among Federal FMLA, Connecticut FMLA, Connecticut Paid Leave, and Paid Sick Leave. Dr. Leggett described the table as a helpful tool for understanding the overlapping programs, in addition to experimenting with AI to generate a podcast-style explanation of the different leave categories.

Mrs. Cowan clarified that employees covered under Connecticut FMLA are required to use up to five days of paid sick leave first before accessing certain leave benefits. She asked whether that requirement applied only to non-certified staff and not teachers. Mr. Brough clarified that under Connecticut paid sick leave rules, employees covered by Connecticut FMLA must use up to five days of paid sick leave first before accessing certain leave benefits. This requirement applies to non-certified employees rather than teachers, since certified staff primarily follow federal FMLA rules. It was also clarified that paid sick leave is separate from FMLA itself.

Mrs. Petrella also questioned an optional "light duty" provision included in the draft policy. Mr. Brough explained the district intentionally chose not to include that language because it could obligate the district to provide light duty assignments to employees returning from leave. Mr. Brough specifically referenced custodial staff, noting that some positions cannot realistically be modified into light duty roles. By excluding the provision, the district retains discretion to allow limited duty work when feasible without being legally required to create or provide such assignments.

Mrs. Petrella mentioned an optional provision involving paid time off (PTO), but Dr. Leggett noted the district does not use a PTO system, making that section irrelevant to their policies.

Mrs. Petrella questioned the financial impact FMLA has on the district. Mr. Brough explained that FMLA itself does not provide pay; it is strictly a job-protection benefit that guarantees employees can return to

their position after qualifying leave. Employees on FMLA may continue receiving pay only if they use accumulated sick leave provided through their bargaining unit contracts. Once accrued sick leave is exhausted, the employee remains on leave in an unpaid status.

The committee then distinguished Connecticut Paid Leave from FMLA. Under Connecticut's paid leave program, employees may apply for wage replacement benefits through the state-administered program, which is managed through AFLAC. The district does not directly fund these benefits; instead, employees contribute through payroll deductions into a state-managed fund. Employees may also combine accrued district leave with Connecticut Paid Leave benefits to help maintain their income while on leave, though they cannot receive duplicate compensation for the same time period.

The committee also discussed intermittent FMLA leave. Mrs. Cowan initially thought the policy lacked language covering intermittent or reduced-schedule leave, but Dr. Leggett pointed out that the policy does include a section under "Types of Leave and Conditions" addressing full-time, intermittent, and reduced-schedule leave arrangements.

Mrs. Cowan asked whether the district handles FMLA administration internally or outsources it to a third-party service. Mr. Brough explained that the district's HR department manages all leave paperwork and tracking internally to oversee the process. Mrs. Cowan noted that, in her own workplace, the growing complexity of Connecticut leave laws led them to outsource administration for additional protection and efficiency.

Mrs. Cowan discussed how Connecticut's evolving leave requirements create significant administrative burdens, particularly with tracking employee time and leave usage. Mrs. Cowan speculated that future legislative changes may attempt to streamline the process, although Connecticut was described as generally more employee-focused than employer-focused.

Mr. Brough also explained recent revisions to Connecticut paid sick day rules. Previously, employees could take paid sick leave in one-hour increments, which created major record-keeping challenges because district software only tracked half-day or full-day increments. The state later revised the rule, now allowing districts to require leave to be used in increments established by bargaining agreements. In this district, leave is tracked in half-day or full-day increments. Dr. Leggett also shared that the district established a rule requiring employees to use the first 40 hours of paid leave at the beginning of their leave period, preventing employees from saving those hours until the end of the year for additional time off.

Mrs. Cowan also had questions about policies surrounding sick days taken immediately before or after vacations or holidays. Mr. Brough replied that employees are entitled to use sick days if genuinely ill, but personal days taken adjacent to vacations or long weekends require prior approval. Mrs. Cowan acknowledged that while abuse is possible, employees can also legitimately become ill before scheduled vacations. Dr. Leggett explained that districts are no longer allowed to request medical documentation from employees until an absence reaches five consecutive days, per the CBA. Mr. Brough also noted that under Connecticut paid leave rules, employees are not always required to disclose detailed reasons for taking leave. As a result, employees may use leave for mental health days or other qualifying personal

reasons without extensive explanation, as part of the broader employee protections built into the state's updated leave policies.

### **B. Religious Observations in Schools (new – required)**

The Policy Committee reviewed the Religious Observations in Schools policy. Dr. Leggett clarified that only part of the proposed policy is legally required following a recent court ruling, specifically, the section dealing with curriculum-related religious objections.

Dr. Leggett discussed whether the required language should remain within a broader religious accommodations policy or be moved into a separate curriculum policy. Dr. Leggett recommended keeping the broader policy intact because the district currently lacks any comparable guidance on religious accommodations.

The conversation focused on how schools should respond when parents raise religious objections to specific curriculum materials, such as books or instructional units. Dr. Leggett emphasized that the recent lawsuit does not allow parents to selectively remove portions of the curriculum at will. Instead, parents may request an exemption based on sincerely held religious objections. Schools are required to work collaboratively with parents to develop a reasonable alternative assignment and any alternative must still meet the same educational competencies and learning objectives as the original material. Dr. Leggett stressed that the law is not intended to create a “buffet-style” curriculum where families can freely pick and choose content. Rather, it establishes a process for reasonable accommodation when legitimate religious conflicts arise.

Mrs. Cowan asked how schools would determine whether a requested accommodation is reasonable or connected to a genuine religious concern. Dr. Leggett suggested that these situations would ideally be resolved through conversation and collaboration among parents, teachers, and sometimes school administrators such as principals. Dr. Leggett shared an example from her teaching career, in which her AP English class was reading the novel *Beloved* by Toni Morrison. A student's father, who was a minister, objected to the book because of its language and sexual content. Rather than simply exempting the student from the assignment, Dr. Leggett met with the family to discuss the educational goals of the unit, including understanding slavery, American history, and the African-American experience. Together, they agreed the student would instead read *Roots* while still participating in broader classroom discussions.

Mrs. Cowan also questioned how formal opt-out requests would likely work. Dr. Leggett explained that parents would typically complete an opt-out form identifying specific religious concerns, the material the family objected to, and suggested alternative assignments.

Dr. Leggett also clarified the background of the recent lawsuit that prompted the policy revision. According to the discussion, the issue arose because a school district's curriculum guidance allegedly instructed teachers to tell students that opposing viewpoints were “wrong,” which escalated concerns about religious freedom and compelled beliefs. Dr. Leggett stressed that the district's teachers focus on teaching students how to think, not what to think, and that differing opinions are respected in classroom discussions.

Dr. Leggett recommended the Policy Committee adopt the broader religious accommodations policy rather than limiting it only to curriculum language required by the court ruling. Dr. Leggett noted the policy would also help address other religious accommodations involving student activities, fasting, dietary restrictions, and related concerns.

The discussion concluded with comments about schools using more neutral language around events and celebrations in an effort to respect diverse religious backgrounds. Examples included referring to “winter concerts” or “winter gatherings” instead of explicitly religious holiday events, while still allowing inclusion of religious songs or traditions as long as multiple faith traditions are represented.

The Policy Committee moved on to discuss the Animal and Schools regulations; however, Mrs. Petrella requested the committee members return to the religious accommodations policy language. Committee members reviewed alternate wording options, focusing on how to frame collaboration between families and the district. They agreed on language emphasizing a cooperative process in which the district fosters understanding and respect for diverse religious beliefs, families are expected to communicate their religious needs, and both parties work together to determine reasonable accommodations. The committee chose to retain a version that emphasizes mutual collaboration, while rejecting alternate language that would require special infrastructure changes, such as dedicated kitchens or extensive dietary systems, which the district felt would be impractical. For dietary accommodations, the committee leaned toward allowing substitutions where feasible, while avoiding language that would require schools to maintain a wide inventory of alternative meals. Mrs. Petrella noted concerns about operational burden and Dr. Leggett suggested consulting Mark Basil for additional guidance.

The committee also rejected an alternate provision related to student religious absences, concluding that such absences are already covered under existing attendance law and do not need to be restated in the policy.

### **C. Animals in Schools 6163.33 Regulations**

Dr. Leggett reviewed the “Animals in Schools” regulations, which were based on a previously approved policy that had been further refined by Shipman. The updated regulations primarily add two separate request forms: One for therapy animals requested for support purposes and one for instructional animals, such as classroom pets or visiting animals brought in for demonstrations (e.g., zoo or wildlife programs).

Mrs. Petrella questioned what costs may be associated with the animals. Dr. Leggett discussed that costs may be associated with these activities, including program fees for visiting presenters and ongoing expenses for classroom animals (such as food and care responsibilities during weekends or vacations).

Discussion briefly returned to the language in the Religious Observations in Schools policy. However, after the committee reviewed policy language, Mrs. Cowan asked whether there is any formal form or process required when a certified service animal is involved. Dr. Leggett explained that, under the recommendation in the revised regulations, there is no form required for service animals. This is intentional, as requiring a form could potentially be viewed as creating an unnecessary barrier or even a violation of the Americans with Disabilities Act (ADA).

Mrs. Cowan clarified that the forms included in the policy are therefore limited to therapy animals (e.g., a therapy dog brought in regularly, such as for counseling support services) or instructional or educational animals (e.g., classroom pets or animals brought in for demonstrations, such as zoo or wildlife presentations).

The discussion shifted to whether community service hours should be formally counted toward graduation requirements and how service learning should be structured in the district.

Mrs. Cowan shared that some students, including middle school students who volunteer (e.g., at Camp Nerden), are interested in having their community service hours formally recognized. However, Dr. Leggett expressed strong opposition to simply “counting hours,” arguing that it does not achieve the intended educational purpose of community service. Instead, Dr. Leggett advocated for a shift toward service learning, which would integrate community engagement directly into the curriculum. Key ideas included embedding service projects into required high school courses so students contribute to community needs while meeting academic competencies. Another suggestion was designing multi-year projects where students plan in freshman year, develop in sophomore year, implement in junior year, and mentor younger students in senior year. Dr. Leggett also discussed ensuring accountability so students meaningfully participate, not just complete group work passively. Dr. Leggett suggested exploring whether middle school could participate in a developmentally appropriate version of service learning, possibly as an introduction to the high school model. All of this is part of the upcoming strategic plan for study.

Mrs. Petrella agreed that community engagement is valuable at all grade levels and could be more meaningfully connected to curriculum and school culture rather than tracked purely through volunteer hours.

Mrs. Cowan questioned whether Connecticut requires community service hours for graduation. Dr. Leggett clarified that there is no state requirement, though it is part of the district’s local graduation requirements.

Dr. Leggett discussed possible future models, including offering a menu of designated “service-learning courses” similar to writing-intensive course requirements in college, allowing student choice in how they fulfill service-learning expectations, and expanding school-community partnerships to make service more structured and meaningful.

### **Public Comment**

There was no public comment.

Before the meeting adjourned, Dr. Leggett invited committee members to attend the Brewster art show that was occurring. Additionally, Mrs. Cowan invited participants to attend “Honoring Those Who Inspire Us: An Evening with Jordan Toma,” a motivational speaker and author.

**Adjournment**

*Mr. Roraback made a motion, seconded by Mrs. Cowan, to adjourn the meeting.*

*All in favor of adjourning the meeting: Mr. Roraback and Mrs. Cowan. Motion passed and the meeting adjourned.*

Respectfully submitted by Meghan Shortell-Fratantonio