

**Executive Summary:**  
**Ketchikan Gateway Borough School District Investigation**

**December 30, 2018**

**Introductory Information**

This report provides a summary of the key information and findings of an investigation conducted between August and November of 2018, regarding reports made to the Ketchikan Gateway Borough School District (School District), which identified concerns about Doug Edwards, while he was employed as a teacher at Ketchikan High School (KHS).

The investigation was focused specifically on determining:

1. What reports were made to the School District during Edwards' employment.
2. How the School District Responded to each of these complaints.
3. Whether or not the School District's response complied with Ketchikan Gateway Borough School District School Board Policies.

It is important to understand that the investigation was compliance-focused, as is this Executive Summary. As such it does not include analysis or evaluation of the School District's actions apart from that necessary to determine whether those actions complied with School Board Policy.

Evidentiary Standard: A preponderance of the evidence (more likely than not).

**Background**

Doug Edwards was employed by the School District as a culinary arts teacher for 15 years and resigned from employment effective June 8, 2018. On June 11, 2018, he was arrested by Ketchikan Police and admitted to inappropriate sexual contact with minor females. His arrest raised questions about what reports were made to the School District about Edwards' conduct while he was teaching and what actions were taken in response to those reports.

The investigation included interviews of more than 35 people, including administrators, teachers, counselors, staff members, citizens, students and parents/guardians. A wide variety of documents and policies were also reviewed, including School Board policies related to inappropriate conduct.

The investigation found that the KGBSD School Board has several policies that address inappropriate conduct, but none provides guidance for school district employees, or individuals who want to make a complaint, about which policy to use when multiple policies appear to be relevant to an issue or incident.

Most of the policies related to Unprofessional Conduct, Sexual Harassment and Discrimination can be found in the following three areas of the KGBSD School Board Policies:

- a. Harassment, Intimidation and Bullying Policies (BP 5131.43 and AR 5131.43)
- b. Sexual Harassment Policies (BP 4119.11, AR 4119.11, and BP 5145)
- c. Title IX-Related Policies – Title IX – Section 504 – Administrative Regulation 4030

The School District's Title IX policies are broad and generally cover issues of gender-based harassment in the school environment. For this reason, the School District's response to each of the reports received regarding Edwards was evaluated against the requirements of the School District's Title IX Policies. However, if a reporter or the School District identified intent to use another relevant policy, the School District's response was measured against that policy and/or corresponding administrative rule.

### **Reports Made to the School District**

The investigation found that during Edwards employment with the school district, six reports alleging inappropriate conduct by him were made. All of these reports were made between 2013 and February 2018. In addition, one incident, involving a school staff member, was directly observed by a school administrator (during the same time frame).

The details of each report made, and the actions taken by the School District in response were reviewed and compared with KGBSD School Board Policy, to determine if the School District complied with policy requirements.

The results of this evaluation:

- For **5** of the reports received, the School District's response **complied** with KGBSD School Board policy.
- For **1** of the reports received, the School District's response **failed to comply** with KGBSD School Board policy.
- For **1** of the reports received, the School District's response **partially complied** with KGBSD School Board policy.

### **Incidents Reported or Observed by Staff and District Response**

**Report #1:** A School District employee reported to the KHS Principal and Vice Principal in 2013 or 2014, that after school hours, he saw Edwards with an unidentified female who was standing inappropriately close to him, and that Edwards had his right arm around the female and inside her blouse. This female was thought not to be a student but a member of Edwards' church.

In this instance the Principal followed up with Edwards providing direction that the non-student not return to school premises and that Edwards not be alone with students. When the School District's response was measured against the requirements of the School District's Title IX-related policies, it was found to comply.

**Report #2:** A Non-School District employee, working on-site at KHS in approximately 2013 or 2014, reported to the KHS Principal that while at KHS after regular school hours, he saw a female student sitting up on the counter with Edwards in front of her, standing between her legs, with his hands on her legs.

When the School District's response was measured against the requirements of the School District's Title IX-related policies, it was found to comply.

**Report #3:** On May 26, 2016, at KHS, The Vice Principal of KHS observed Edwards making physical contact with a KHS staff member. In this case, Edwards had the front of his body in contact with the side of the employee and one hand on her upper chest and the other rubbing her back.

When the School District's response to this incident was compared with the School District's Sexual Harassment Policies the School District was found to have complied, in part, with these policies and not complied in part.

The School District complied with the portions of the Sexual Harassment Policies that require: 1) providing the Principal with notification of the concern; and 2) notifying the Central Office Contact, Superintendent Boyle.

The School District did not comply with the portions of the policy that require: 1) summarizing the verbal complaint in writing and providing it to the Superintendent within one working day (it was provided within 5 days); and 2) ensuring that the complainant understood that she had the option of choosing an informal process and that if she selected that process, Edwards could not receive disciplinary action.

**Report #4:** On June 1, 2017, a student reported to a teacher that she had seen Edwards put his hands on the hips of another student. The teacher and student reported this information to the KHS Vice Principal and interviews of students were conducted. In those interviews the concern

about Edwards placing his hands on the hips of another student was confirmed by that student. That student stated that Edwards had also inappropriately hugged and tickled her multiple times and that this made her significantly uncomfortable. Other students interviewed said that Edwards had engaged in excessive hugging, tickling, shoulder rubbing and attempts at lap sitting.

The Superintendent and Vice Principal, on June 1, 2017, issued a written warning to Edwards directing him not to touch anyone while involved in his work as a teacher with the School District.

When the School District's response was measured against the requirements of the School District's Title IX-related policies, it was found to comply.

**Report #5:** On January 9, 2018, a student reported to the KHS Principal and Vice Principal that Edwards had made her uncomfortable by cupping her face, telling her she was beautiful, putting his hands on her hips from the front and behind, putting his arm around her waist and rubbing and touching her lower back during the prior school term.

Shortly after this report was made, the Superintendent was informed, and the KHS Vice Principal interviewed additional students with a female school counselor present and then spoke with Edwards. School District leadership discussed this issue and the Superintendent approved a decision to put Edwards on unpaid leave for 2 days and issue him documentation that 1) identified his violation of the prior directive; and 2) again directed him to refrain from any physical contact with others.

When the School District's response was measured against the requirements of the School District's Title IX-related policies, it was found to comply.

**Report #6:** On January 9, 2018, an unidentified student reported behaviors of Edwards during the prior (2016-2017) school year that were similar to those described by the student in Report #5. The written notes of the KHS Vice Principal identify that the student had been afraid to report the issues at the time they occurred. The Vice Principal was not able to recall the name of this student or find a record of her name in his records.

When the School District's response was measured against the requirements of the School District's Title IX-related policies, it was found to not comply.

**Report #7:** On February 6, 2018, a student reported to the Principal of Revilla Alternative School that Edwards tried to put a banana in or near her mouth during a culinary class at KHS sometime between Thanksgiving and Christmas Break in 2017, and that it made her uncomfortable,

The reporting student and a student who had witnessed this event were also interviewed (separately) by the Revilla Principal, along with the KHS Vice Principal. When asked about this incident Edwards said he was just showing the student that the banana was not rotten and that he had done nothing inappropriate.

School and School District leaders met to discuss the issues and determine next steps. The Superintendent decided to meet personally with Edwards about this complaint. At that meeting the Superintendent told Edwards he would not sign the renewal for Edwards' Teaching Certificate which was to expire in October 2018. Shortly thereafter, Edwards provided notice that he would resign at the end of the current school year.

The Superintendent stated that he also informed Edwards that he would receive a "stepped-up" response if he had any incidents before the end of the school year. The Superintendent also asked the KHS Principal and Vice Principal to monitor Edwards regularly for the remainder of the school year.

When the School District's response was measured against the requirements of the School District's Title IX-related policies, it was found to comply.

**Conclusion:**

The investigation substantiated that between 2013 and February 6, 2018, six complaints were made to School District employees regarding the behavior of Edwards and one incident where Edwards was directly observed by a school administrator.

In response to the reports identified in this investigation, the School District on many occasions met the policy requirements in their responses to these reports. In a few instances they did not.