



PROFESSIONAL, CLERICAL, TECHNICAL EMPLOYEES ASSOCIATION

March 31, 2026

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Dr. Pascal Mubenga
Superintendent of Schools
Buffalo City School District
Buffalo, NY, 14202

Subject: Code of Conduct Revisions and Employee Safety

Dr. Mubenga,

I am writing on behalf of the security personnel and other school-based staff I represent as President of the Professional Clerical and Technical Employees Association to share concerns about the District's proposed changes to the Student Code of Conduct.

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We recognize and respect the District's obligation to address concerns related to equity in the application of student discipline, including its commitments under the recently entered Assurance of Discontinuance. Ensuring fairness, consistency, and the elimination of disparate impacts in disciplinary practices is an important and necessary goal, and one we support in principle.

At the same time, there is significant concern among our members that the possible changes may have the unintended consequence of increasing risks to employee safety—particularly for Security Officers, who are routinely called on to respond to the most serious incidents.

Over the past several years, our members have experienced a marked increase in serious incidents involving violence, threats, and unpredictable behavior. Security officers, in particular, have been injured with concerning frequency while intervening in situations involving aggressive or unsafe student conduct. These are not isolated occurrences—they reflect a broader trend that our members are dealing with on a regular basis.

There is also a growing sense that disciplinary expectations have shifted in a way that can leave staff managing dangerous situations without clear consequences or sufficient support. When students who engage in serious or violent behavior remain in general school settings without adequate safeguards, it creates real challenges for maintaining a safe environment, not to mention its impact on other students' learning environment.

We also want to be clear that reducing out-of-school suspensions, by itself, should not be viewed as a measure of success. That goal has to be considered alongside the day-to-day realities in schools. A reduction in suspensions must not come at the expense of employee and student safety. If the practical effect of these changes is to allow students who engage in violent or dangerous conduct to remain in general school settings without adequate safeguards, then the policy risks substituting one serious problem for another.

Dr. Pascal Mubenga

March 31, 2026

Page 2

Students with special education needs deserve to be met with patience, understanding, and the right supports to help them succeed. Our concern is that, under current conditions, staff are too often asked to respond to complex behavioral situations without the training, information, or resources necessary to do so effectively. That is not fair to our members, but it is also not fair to the students themselves. When staff lack the tools to recognize triggers, apply appropriate interventions, or follow individualized strategies, even well-intentioned responses can escalate situations or miss opportunities for meaningful support. Ensuring that staff are properly equipped is not only a safety issue—it is a matter of providing students with the dignity, care, and appropriate response their needs require.

With that in mind, we believe any changes to the Code of Conduct should be accompanied by additional supports and safeguards. In particular, security personnel need more targeted training. This should include trauma-informed approaches to intervention, as well as practical, evidence-based self-defense techniques that are designed to reduce the likelihood of injury to both students and staff.

We would also ask for the opportunity to be meaningfully involved before any final changes are adopted, and for a clear explanation of how staff safety will be addressed under the revised Code. Ongoing tracking and sharing of data related to staff injuries and serious incidents would also be helpful in understanding the real-world impact of any changes.

We believe it is possible to address equity concerns while also maintaining a safe and orderly environment. Our members are committed to doing their jobs well and supporting students, but they need to be able to do so safely.

We would welcome the opportunity to meet and discuss these issues further.

Thank you for your time and consideration.

Sincerely,



President, PCTEA

CC:

Dr. Kathy Evans-Brown, President, Buffalo Board of Education

Dr. Sharon Brown, Chief of Student Support Services

Mary Scarpine, General Counsel

Tami Hollie-McGee, Chief of Human Resources