

BEFORE THE
PALM BEACH COUNTY SCHOOL BOARD, FLORIDA

ARTHUR C. JOHNSON, Ph.D.)
Superintendent of Schools)
 Petitioner,)
)
vs.)
)
MARIA WARREN,)
 Respondent.)
_____/

PETITION FOR SUSPENSION WITHOUT PAY
AND DISMISSAL FROM EMPLOYMENT

Dr. Arthur C. Johnson, Ph.D., Superintendent of Schools of the School District of Palm Beach County, Florida, pursuant to the due process provisions of Sections 1012.33, 120.569, 120.57, 1012.22(f), and 1012.27(5), Florida Statutes, files this Petition for Suspension Without Pay and Dismissal from Employment of Respondent, Maria Warren, from the School District of Palm Beach County, Florida, for failure to correct her deficiencies sufficient to warrant a satisfactory performance evaluation, thereby precluding Respondent from meeting the School Board’s minimum standards for continuing employment in the Palm Beach County School District, constituting just cause for dismissal under Fla. Stat. Section 1012.40; and School Board Policy and Directive 3.27, and states as follows:

I. JURISDICTIONAL BASIS

1. The agency is the School Board of Palm Beach County, Florida, located at:

3340 Forest Hill Boulevard
West Palm Beach, Florida 33406-5869
Attn: Board Secretary

Petitioner, Arthur C. Johnson, Ph.D., is the duly appointed Superintendent of Schools of the Palm Beach County School District, Florida.

2. The address of the Petitioner is:

Superintendent of Schools
Palm Beach County School Board
c/o JulieAnn Rico Allison, Esq.
3318 Forest Hill Boulevard, Suite C-302
West Palm Beach, Florida 33406-5813

3. Petitioner has the statutory responsibility and obligation to recommend the placement of school personnel and to require compliance and observance by all personnel of all laws, policies and directives. Pursuant to Section 1012.27, Florida Statutes, Petitioner has the authority to recommend to the School Board of Palm Beach County, Florida, that school district employees be dismissed from employment.
4. Respondent is a Secretary I in the No Child Left Behind/Federal Grants Department for the Palm Beach County School District.
5. The last known address of Respondent is 17218 Shettland Lane, Loxahatchee, Florida.

II. ADMINISTRATIVE CHARGES

Petitioner, Arthur C. Johnson, Ph.D., alleges as follows:

6. The Respondent has been employed with the District since May 1991.
7. The deficiency areas noted in her Preliminary Noninstructional Evaluation dated May 10, 2005 included job knowledge, self-motivation, self-management, interpersonal effectiveness, and written and oral assignments.

8. On or about May 10, 2005, and pursuant to Florida Statutes §1012.34, and Article 3 §B of the Collective Bargaining Agreement between the Association of Educational Secretaries and Office Personnel and the School District of Palm Beach County, Florida, Respondent signed a Memorandum of Assistance acknowledging that she had received notice of her deficiencies, and she was placed on a Thirty (30) Calendar Day Assistance Plan for improvement.
9. Respondent received assistance to improve her performance on the following dates:

December 14, 2004	May 10, 2005
December 16, 2004	May 25, 2005
December 22, 2004	June 9, 2005
January 14, 2005	
10. At the conclusion of the Memorandum of Assistance Period, Respondent's deficiencies had not been corrected to a sufficient extent to warrant a satisfactory evaluation.
11. Respondent, having failed to correct her deficiencies sufficient to warrant a satisfactory evaluation, is recommended for dismissal by the Superintendent in accordance with the requirements of Florida Statutes Sections 1012.22(f), 1012.27(5), and 1012.34; and Article 3 §B.14. of the Collective Bargaining Agreement between the Association of Educational Secretaries and Office Personnel and the School District of Palm Beach County, Florida. The Petitioner is entitled to recommend to the School Board of Palm Beach County, Florida that the Respondent's employment be terminated.

