



STATE OF CONNECTICUT

OFFICE OF THE CHILD ADVOCATE

**A REVIEW OF CHILDREN WITHDRAWN FROM SCHOOL
FOR EQUIVALENT INSTRUCTION ELSEWHERE**

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I. INTRODUCTION

The Office of the Child Advocate (“OCA”) is an independent government agency that is statutorily required to “[r]eview complaints of persons concerning the actions of any state or municipal agency providing services to children and of any entity that provides services to children through funds provided by the state ... investigate those where the Child Advocate determines that a child or family may be in need of assistance from the Child Advocate or that a systemic issue in the state's provision of services to children is raised by the complaint ... provide assistance to a child or family who the Child Advocate determines is in need of such assistance including, but not limited to, advocating with an agency, provider or others on behalf of the best interests of the child . . . [and] [e]valuate the delivery of services to children by state agencies and those entities that provide services to children through funds provided by the state.”¹ Concurrently, OCA is required to “[t]ake all possible action including, but not limited to, conducting programs of public education, undertaking legislative advocacy and making proposals for systemic reform and formal legal action, in order to secure and ensure the legal, civil and special rights of children who reside in this state.”²

In February 2025, police responded to reports of a fire in a home in Waterbury and rescued a man who was emaciated and dirty, had matted hair, and had what appeared to be rotten teeth. According to the warrant for the arrest of the alleged victim’s step-mother, police later determined that the alleged victim, who has since asked to be identified as S, was 32 years old, weighed 68 pounds, and had allegedly been held captive since the age of 11. Multiple news reports indicated that school officials reported concerns of neglect prior to the boy’s removal from school in or around 5th grade. OCA immediately opened an investigation and continues to gather documentation and assess all of the system implications of this case. OCA anticipates issuing a public report in the future, which will include recommendations developed from that investigation.

As discussed in this report, S is not alone in the experience of abuse and neglect at the hands of a parent or caregiver following withdrawal from public school. OCA writes this report to highlight an ongoing previously identified systemic issue that must be addressed by policy makers: that some parents and guardians withdraw their children from school, isolate their children, shield themselves from reports to our child welfare agency, and neglect or abuse their children. We, as a state, have enabled this to occur through our lack of statutory requirements and regulations. OCA recommends that the state adopt several basic statutory requirements that would ensure that children who are withdrawn from school receive an education while also ensuring that parents continue to have the right to choose to educate their children outside of public school.

¹ Conn. Gen. Stat. § 46a-13l.

² Id.

II. WILLIAM'S³ STORY

While it is rare to see a case as extreme as what has been alleged with regard to S, it is not a singular occurrence. OCA previously issued a report on the death of Matthew Tirado, a 17-year-old boy with Autism and Intellectual Disability who died in 2017 from abuse, starvation, and dehydration. Mathew's mother restricted his access to food by shuttering cabinets and the refrigerator. While Matthew was not attending school, hidden from view, and being abused and neglected, his mother withdrew her younger child from school for the stated purpose of homeschooling. The withdrawal occurred just three months before Matthew died and despite the facts that the district previously made multiple reports on both children, the mother had previously been found to have physically abused the child, and the mother was placed on the DCF Central Registry. DCF was not notified of the withdrawal and did not know the child was not attending school when they closed their case.

In 2023, another child was found locked away and being abused after his parent removed him from school for the stated purpose of homeschooling.

In January 2023, police responded to a domestic disturbance related to illegal substance use and discovered a 10-year-old child, locked in a room, in an abandoned building where the family was living. The child's stepfather was arrested for Risk of Injury, Unlawful Restraint, Cruelty to Persons, Strangulation First Degree, and Reckless Endangerment. His mother was arrested and charged with Conspiracy to Commit Assault Second Degree, Risk of Injury (3 counts), Conspiracy to Commit Unlawful Restraint First Degree, Conspiracy to Commit Intentional Cruelty to a Child, Conspiracy to Commit Strangulation First Degree, and Conspiracy to Commit Reckless Endangerment First Degree.

According to the warrant, the boy, for whom we will use the pseudonym William, was found in a room with a dead bolt on the exterior of the door and was observed to have numerous bruises, appeared malnourished and had hair loss. He also had trauma to his ears and reported that he had lost weight. William described being locked in a 4' by 5' closet for approximately one month, being kicked and stomped repeatedly, and being "hog tied." The warrant states that, upon medical examination, William was found to have multiple traumas throughout his body, a broken finger, cauliflower ear [deformity of the ear due to blunt force trauma], and that he was undernourished. The warrant alleges that William was removed from school to be homeschooled, that he had not been receiving education, and William's mother corroborated that the child was removed from school to hide evidence of injuries.

OCA conducted a limited review of this case to determine if the family had a prior history with DCF. Between 2005 and 2021, DCF received and accepted 13 reports (12 handled as investigations and one handled as Family Assessment Response). Eleven of the reports were received between 2005 and 2010, before William's birth, in relation to his mother's two oldest children. The presenting issues included inadequate shelter, substance misuse, and physical

³ William is a pseudonym.

abuse and the children were removed. William's mother was placed on the DCF Central Registry. In 2012, the mother's rights to her oldest children were terminated.⁴

William was born approximately eight months after his mother's rights to her oldest children were terminated. Between his date of birth and the date of the arrest of his mother and stepfather in March 2023, DCF received two reports. In 2015, DCF received a report raising concerns about drug use and supervision of then two-year-old child William. At that time, the mother and William's father were living together. DCF opened an investigation and conducted an unannounced home visit the next day. While DCF did not substantiate the allegations, OCA's review of the investigation determined that DCF appropriately assessed the family, including through conducting unannounced home visits, hair testing for the use of illegal substances (negative except for marijuana), requiring participation in treatment, random urinalysis, and through the provision of ongoing services for approximately six months. Consistent with policy, prior to closing the case DCF obtained confirmation from mother's providers that she was compliant with treatment and confirmed the child was up to date with medical and dental care.

DCF received another call in May 2021. At that time, the caller alleged that the children, William (age 8) and a sibling (age 4) had been left home alone one night. The case was handled as a Family Assessment Response. The worker attempted an unannounced home visit the next day. No one was home and the worker left a note. The mother responded to DCF the same day and scheduled a visit for the next day. The mother cooperated with the investigation. The worker observed the home and noted no concerns; obtained authorizations to obtain medical, dental, and school records; and interviewed the children alone. Both children denied being left home alone. DCF contacted the medical and dental providers to confirm care. DCF inquired about any concerns for intimate partner violence and the mother denied any concerns. DCF observed interactions between the mother and children to be appropriate and the children were engaging. The children reported no concerns about the step-father. The step-father was neither seen nor interviewed as he was reportedly out of state to visit a sick family member. The report was unsubstantiated and DCF closed the case.

No new reports were made to DCF prior to the stepfather's arrest in January 2023.

According to the warrant, William's mother withdrew him from school for the stated purpose of homeschooling. OCA obtained educational records from the relevant school district, including records for all three children in the family. Educational records for all three children show they were attending school and making adequate progress in prior school years. While William was withdrawn, his siblings remained in public school. Nothing in the educational records at the time of withdrawal indicated that there were concerns for abuse or neglect. Rather, records from the prior school year show that he attended all but two days and was meeting all expectations. He was described as "an intelligent and creative student. He has made excellent progress in all areas . . . is cooperative and kind . . . He works well both independently and with his peers."⁵

In the absence of other evidence, the sole act of withdrawing William for homeschooling would not have been an adequate basis for the school to make a report to DCF.

⁴ The father's rights were also terminated. William has a different father.

⁵ Student Report Card.

After the date of William’s withdrawal from school, it is alleged that he was isolated and subjected to severe physical abuse until he was discovered by police in January 2023. Had William not been found by police, he may have remained hidden and subjected to abuse for an untold amount of time. Because he was a student withdrawn for the stated purpose of homeschooling, there was no required follow up by the school district, no required follow up by the State Department of Education, and no established mechanism to require the parent to show that the child was, in fact, receiving equivalent instruction as the law requires.

III. CONNECTICUT LAW

Connecticut law requires that parents enroll their children in public school, “unless such child is a high school graduate or the parent or person having control of such child is able to show that the child is elsewhere receiving equivalent instruction in the studies taught in the public schools.”⁶ The law also requires local boards of education to “cause each child five years of age and over and under eighteen years of age who is not a high school graduate and is living in the school district to attend school in accordance with the provisions of section [10-184](#).”⁷ Nothing in state law or regulation, however, establishes any mechanism by which a parent must show that the child is receiving equivalent instruction. In practice, there is currently no meaningful enforcement of these provisions.

In 1994, the Connecticut State Department of Education (“CSDE”) published guidance to school districts outlining the agency’s view of how districts can and should comply with school enrollment requirements in the context of homeschooling. The CSDE’s guidance stated:

[if] parents wish to educate their child in their home, they must show equivalency as described in Section 10-184 and local boards of education must determine whether or not such a child is receiving equivalent instruction as required by Section 10-220.⁸

The CSDE’s suggested procedures for home instruction provide:

[a]n annual portfolio review will be held with the parents and school

⁶ [Conn. Gen. Stat. § 10-184](#). Parents of children aged 5 and six have the option of not sending their children to school until age 7 “personally appearing at the school district office and signing an option form. The school district shall provide the parent or person with information on the educational opportunities available in the school system.”

⁷ [Conn. Gen. Stat. § 10-220](#). “[T]he Supreme Court has recognized that, given the important governmental interest in educating its citizens, the state generally has the power to compel attendance at school.” [Gary B. v. Whitmer](#), [957 F.3d 616, 640](#) (citing *E.g., Wisconsin v. Yoder*, 406 U.S. 205, 213, 92 S. Ct. 1526, 32 L. Ed. 2d 15 (1972); *Prince v. Massachusetts*, 321 U.S. 158, 166, 64 S. Ct. 438, 88 L. Ed. 645 (1944); *Pierce v. Soc’y of the Sisters of the Holy Names of Jesus & Mary*, 268 U.S. 510, 534, 45 S. Ct. 571, 69 L. Ed. 1070 (1925); *Meyer*, 262 U.S. at 402.)

⁸ Circular C-14 (July, 1994-95) (emphasis added).

officials to determine if instruction in the required courses has been given [and any] continued refusal by the parent to comply with the reasonable request of the school district . . . to participate in an annual portfolio review may cause the child to be considered truant.⁹

CSDE's guidance states that compliance with the suggested procedures contained in the guidance document would satisfy the statutory requirements contained in §§ 10-184 and 10-220.¹⁰ When OCA conducted a review of homeschooling in 2018, discussed in more detail below, we learned that these suggested procedures are generally not implemented.

STATE DEPARTMENT OF EDUCATION (CSDE)
WHAT HAPPENS WHEN CHILDREN ARE NOT ATTENDING SCHOOL
OR ARE WITHDRAWN

The Office of the Child Advocate met with the State Department of Education to determine what happens at the state level when a parent reports to a local school that they are leaving the school. CSDE has a robust data collection system and [interactive dashboard](#) to report on the performance of school districts. Requirements for students who are chronically absent are robust but when a student is withdrawn for the stated purpose of equivalent instruction elsewhere (private school or homeschooling), there are no requirements.

Chronic Absenteeism

CSDE collects data from every school district, including data regarding chronic absenteeism. In 2015, chronic absenteeism was added to CSDE's accountability framework. Because this data is collected and included in the state's accountability framework, there are extensive protocols for what steps a district must take when a student is chronically absent from public school (defined as absent for any reason for 10% or more of school days) and what must occur before the district can identify the student as withdrawn.

CSDE requires districts to make efforts to engage students who are enrolled in the district but are not attending or are chronically absent.¹¹ According to CSDE's Public School Information System (PSIS) 2022-23 PSIS Reference Guide:

If it has been confirmed by the district that the child is still residing in the district but not attending school, then the district must implement its due process procedures and practices to get the child to start attending school. These steps include but are not limited to sending mail to the student's last known address, home visitation by a school official, referral to community agencies (e.g., Youth Service Bureau, Child Guidance Clinics) filing a referral of educational neglect with the Department of Children and Families (Form DCF136), and holding PPTs

⁹ Id.

¹⁰ Id.

in compliance with Child Find obligations to see if the child is eligible for special education.

When students are chronically absent, districts are expected to implement tiered interventions in an effort to re-engage the student. CSDE has provided detailed guidance to districts to support intervention and re-engagement.¹²

The district may not enter the student as withdrawn on CSDE's system unless:

- The student is 17 and the parent has provided permission to withdraw in accordance with Connecticut General Statutes 10-184.¹³
- The parent has provided other reasons for withdrawing including transferring to another public school in the state, enrolling in private school, transferring to a charter school, or receiving homeschooling.

Unless the parent has taken proper steps to withdraw, the student must remain entered as an enrolled student and the district must continue efforts to try to reengage the child to return to school.

Transfers within Connecticut

When a parent reports that the student will be enrolled in another district, the district must obtain and retain written documentation. CSDE's Public School Information System (PSIS) 2022-23 PSIS Reference Guide states that "[p]roper evidentiary documentation must be maintained at the district to affirm that the child is no longer residing in the district. Examples of such documentation include formal notification by the parent or a formal request for records from the child's new school district." When this documentation is received, the district must enter information into CSDE's data collection system indicating that the student has withdrawn for the purpose of transferring to another Connecticut district. CSDE monitors these students to identify students who are not enrolled in a new district. CSDE notifies the district in which the student was last enrolled and the district is expected to make diligent efforts (consistent with what is described above) to determine if the student still resides in the

¹² See [Guidelines for Excused and Unexcused Absences, Connecticut State Department of Education \(2013\)](#) and [Reducing Chronic Absence in Connecticut Schools: A Prevention and Intervention Guide for Schools and Districts, Connecticut State Department of Education \(2017\)](#).

¹³ Connecticut General Statute 10-184 states: "For the school year commencing July 1, 2023, and each school year thereafter, a student who is eighteen years of age or older may withdraw from school. Such parent, person or student shall personally appear at the school district office and sign a withdrawal form. Such withdrawal form shall include an attestation from a guidance counselor, school counselor or school administrator of the school that such school district has provided such parent, person or student with information on the educational options available in the school system and in the community. The parent or person having control of a child seventeen years of age may withdraw such child from school and enroll such child in an adult education program pursuant to section [10-69](#). Such parent or person shall personally appear at the school district office and sign an adult education withdrawal and enrollment form. Such adult education withdrawal and enrollment form shall include an attestation (1) from a school counselor or school administrator of the school that such school district has provided such parent or person with information on the educational options available in the school system and in the community, and (2) from such parent or person that such child will be enrolled in an adult education program upon such child's withdrawal from school."

district. CSDE stated that notification to the district will typically occur within two weeks if the student is not enrolled elsewhere.

Withdrawn for Private School/Homeschool/Moved Out of State

If a parent notifies the district that the student will attend private school, will be homeschooled, or has moved out-of-state, this will be entered into the system. The expectation of CSDE is that the district would obtain documentation of withdrawal. This would typically be a withdrawal form that states the parent is withdrawing and stating the reason (i.e. moving out of state/private school/homeschool).¹⁴ Aside from the withdrawal form, no other supporting documentation is required. Once the student is entered as withdrawn for these purposes, they remain withdrawn unless the family re-enrolls. There is no requirement that the child's status be updated annually.

Notably, if a child is chronically absent or truant, and the parent subsequently notifies the school that they are withdrawing their child (to enroll in private school, to be homeschooled, or are moving out of state), there are, likewise, no requirements for follow up by the district or by CSDE.

DCF'S INVESTIGATION REQUIREMENTS

If a parent does not ensure that their child is attending school or receiving equivalent instruction elsewhere, this may give rise to allegations of educational neglect. The term "educational neglect" does not exist in state law. Rather, state statute provides that a child "may be found 'neglected' who, for reasons other than being impoverished, (A) has been abandoned, (B) is being denied proper care and attention, physically, educationally, emotionally or morally, or (C) is being permitted to live under conditions, circumstances or associations injurious to the well-being of the child."¹⁵ DCF has adopted policies that further define the various forms of abuse and neglect, provide guidance to DCF staff on assessing whether the facts in a particular case meet the statutory definition of neglect, and support consistent application of the law across the agency.

Educational neglect is defined in DCF policy as follows:

Definition: Educational neglect occurs when a school-aged child has excessive absences from school through the intent or neglect of the parent or caregiver.

Note: Excessive absenteeism and school avoidance may be presenting symptoms of a failure to meet the physical, emotional or medical needs of a child. Careline staff shall consider these potential additional allegations at the time of referral.

Criteria:

¹⁴ If no withdrawal form is filed but the district receives a request for records from another school for the purpose of transfer, this is adequate and the child will be entered as transferred to another school.

¹⁵ [Conn. Gen. Stat. § 46b-120](#).

- For children school-aged to age 12 excessive absenteeism may be indicative of the parent's or caregiver's failure to meet the educational needs of the student.
- For children older than age 12 excessive absenteeism, coupled with a failure by the parent or caregiver to engage in efforts to improve the child's attendance, may be indicative of educational neglect.

Note: For children older than age 12, excessive absenteeism through the child's own intent, despite the parent's or caregiver's efforts, is not educational neglect. Rather this is truancy which is handled through the school district.

Considerations in determining the criteria for excessive absenteeism, the following characteristics of the child shall be considered by the Social Worker:

- age;
- health;
- level of functioning;
- academic standing; and
- dependency on parent or caregiver.

In determining the criteria for excessive absenteeism, the following characteristics of the parent or caregiver shall be considered by the Social Worker:

- rationale provided for the absences;
- efforts to communicate and engage with the educational provider; and
- failure to enroll a school-aged child in appropriate educational programming (including homeschooling).

Definition of School-Aged Child: Except as noted below, a school-aged child is a child five years of age and older and under 18 years of age who is not a high school graduate. Exceptions:

- A parent or person having control of a child may exercise the option of not sending the child to school at age five or six years by personally appearing at the school district office and signing an option form. In these cases, educational neglect occurs if the parent or person having control of the child has enrolled the child at age five or six years and then does not allow the child to attend school or receive home instruction.
- A parent or person having control of a child 17 years of age may consent to such child's withdrawal from school. The parent or person shall personally appear at the school district office and sign a withdrawal form.

Note: Failure to sign a registration option form for the child is not in and of itself educational neglect.

As currently written, enrollment in homeschool is considered enrollment in an appropriate educational program. This is consistent with state law but also appears to require no assessment of whether the child is receiving equivalent instruction. Review of DCF cases suggests that caseworkers do make inquiries to confirm that the child is receiving instruction but do not assess

the quality of the instruction. Given the lack of statutory requirements or regulation by the State Department of Education, DCF is not well-positioned to create its own standard and caseworkers do not have the appropriate training to judge the quality of education being provided.

IV. REVIEW OF CHILDREN WITHDRAWN FOR HOMESCHOOLING

OCA'S 2018 REVIEW ON CONNECTICUT CHILDREN WITHDRAWN FROM SCHOOL FOR HOMESCHOOLING – SIX DISTRICTS

Matthew Tirado, a teenager diagnosed with Autism and Intellectual Disability, died in February of 2017 from prolonged child abuse and neglect. Prior to his death, DCF had an open case for several years, related to substantiation of educational neglect regarding Matthew and a substantiation of physical abuse regarding his younger sister. During the course of OCA's investigation, OCA learned that Matthew's sister was withdrawn from school for the stated purpose of homeschooling only three months before Matthew died. Despite the fact that the school had previously filed several reports with DCF, and DCF's case was open, the district did not notify DCF of the withdrawal for the stated purpose of homeschooling. This raised concerns about the lack of oversight related to children who are homeschooled and prompted OCA to investigate further.

For that report, OCA obtained and reviewed data from six districts (two large urban school districts, two small districts, and two mid-sized suburban districts) regarding children withdrawn from school to be home schooled over a three-year period and published a report entitled [Examining Connecticut's Safety Net for Children from School for the Purpose of Homeschooling – Supplemental Investigation to OCA's December 12, 2017 Report Regarding the Death of Matthew Tirado.](#)

OCA found that 380 children were withdrawn from the six school districts over a three year period. Of the 380 children, 139 (36%) lived in families that had at least one prior accepted report to DCF. Forty-three (11%) of the children lived in families with four or more prior accepted reports. OCA sampled cases that had DCF involvement and provided seven case examples that demonstrated the need for a safety net.

In OCA's 2018 review, none of the six districts regularly conducted follow-up portfolio reviews with parents and withdrawn students, though some district administrators indicated that they offer the portfolio review to the family and leave the matter to the discretion of the parent. None of the districts were able to produce data or documentation that any follow-up is systematically done with students who were withdrawn from school to be homeschooled.

OCA 2025 REVIEW ON CONNECTICUT CHILDREN WITHDRAWN FROM SCHOOL FOR HOMESCHOOLING - STATEWIDE

OCA requested that CSDE provide the total number of children withdrawn for the stated purpose of homeschooling from July 1, 2021 to June 30, 2024 (a period of 3 school years). As of April 7, 2025, 5,102 children under 18 were withdrawn from school for homeschooling during the three year period. Because Connecticut does not specifically require enrollment in the local public school and approval prior to initiation of homeschooling, however, Connecticut has no way of knowing how many children in Connecticut are actually homeschooled. CSDE's data does not include children who:

- were born in Connecticut, whose parent opted to homeschool from the beginning and were never enrolled in the local public school; and
- are in a family that moved to Connecticut, opted to homeschool, and did not enroll in the local public school; or
- were enrolled in private school (or withdrawn from a local public school with notice of intent to enroll in private school) and the parent later opts to homeschool.

OCA requested that CSDE provide a complete list of all children under the age of 12 withdrawn from school for any reason from July 1, 2021 to June 30 2024 (a period of 3 school years).¹⁶ Over that three-year period, 2236 children under age 12 were withdrawn for the stated purpose of being homeschooled.¹⁷ Of those, 30% were chronically absent and 19% percent were identified as special education students prior to their withdrawal from public school.¹⁸

When OCA narrowed the list to exclude children under the age of seven, 1547 children were withdrawn to be homeschooled. Of those, 31% were chronically absent and 19% were children identified as students with special education needs prior to their withdrawal from public school.¹⁹

Children Aged 7 to 11 – DCF Involvement

From the list of 1547 children, OCA then randomly selected 50% of the children (774

¹⁶ Any student withdrawn during this time period, but re-enrolled within the same time period, was not included in the data.

¹⁷ A total of 6,702 children under age 12 were withdrawn from public school to receive equivalent instruction elsewhere within the state of Connecticut. Of those, and 4,466 were children who were withdrawn from school for the stated purpose of being enrolled in private school in Connecticut and 2,236 were withdrawn for the stated purpose of being homeschooled.

¹⁸ The statewide average for chronic absenteeism for the same three-year period was approximately 20%. For children identified with special education needs, it was approximately 17.8 %.

¹⁹ Of the 4,466 children withdrawn for the stated purpose of enrolling in private school in the state, 14.8% were chronically absent and 12.7% had identified special education needs. When children under the age of 7 were excluded, 3,242 students withdrawn to attend private school. Of those, 438 (13.5%) were chronically absent and 373 (11.5%) were identified as students with special education needs.

children) to cross reference with DCF records to understand the prevalence of contact with DCF. OCA found that of the 774 children, 22.9% (177) of the children lived in families with at least one accepted DCF report. The number of reports ranged from 1 to 23. 7.9% (61) lived in families with four or more accepted reports to DCF.

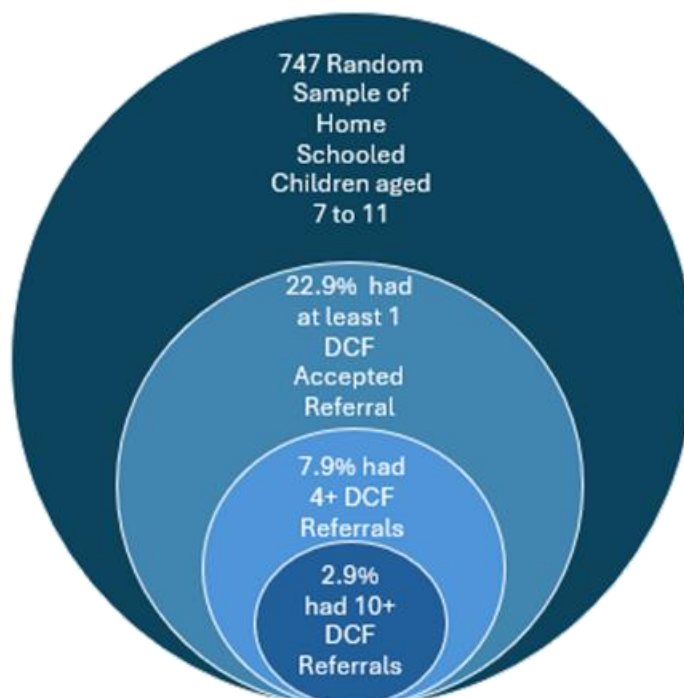


Figure 1: DCF Involvement, Children Aged 7 to 11

9.6% (75) percent of the 774 children in our sample of the children lived in families with at least one substantiated DCF investigation.²⁰ 3.8% (30) lived in families with a caregiver on the DCF central registry.²¹

CASE SAMPLING

OCA sampled cases in which children had been removed for the stated purpose of homeschooling and who had four or more accepted reports. For this review, OCA reviewed LINK records for the family. OCA did not obtain or review educational or medical records for the children involved.

²⁰ In 2023, DCF received 69,562 reports. Of those, 32,462 were accepted. Of the 32,462 accepted, 3733 (11.4%) were substantiated. [DCF Data Connect](#). Approximately half of all accepted cases proceed under Family Assessment Response. In those cases, there is no determination made as to whether the allegations are substantiated or unsubstantiated. [DCF Final Report: Annual Progress and Services Report for the Period 2020-2024](#), at 7.

²¹ OCA randomly selected a sample of 250 children who were withdrawn for the stated purpose of attending private school and cross referenced those children with DCF records. OCA found that 10.4% had at least one accepted report, 3% had four or more accepted reports, 4.4% had at least one substantiation, and 2.0% had a caregiver on the DCF Central Registry.

Case Example 1

Date of Withdrawal for Homeschooling: October 11, 2022

Date of Most Recent Prior DCF Report: October 22, 2020

OCA reviewed the DCF LINK records of the child whose family had the highest number of accepted reports to DCF. In that case, a 9.5 year old child was withdrawn from school in October 2022 for the stated purpose of homeschooling. DCF had open cases nearly continuously from 2006 to 2019, regarding the family's seven children. The family has been the subject of 23 accepted reports, seven of which were substantiated. The mother is on the DCF Central Registry. Five of the seven substantiated reports were for educational neglect of three older siblings and one involved having some of the children help with stealing items in a department store. DCF records indicate that the mother appears to have cognitive limitations.

In 2017, in substantiating educational neglect of an older sibling, DCF concluded that "mother is unable or unwilling to make the necessary commitment to provide a stable and structured home environment that is conducive to healthy maturation of her children and consistent educational partnership with the school system." DCF filed court petitions based on educational neglect of older siblings and received an order of protective supervision. The case closed shortly after DCF sought to extend protective supervision and the court denied the request. The child who was subject of the petition was 17 and was moving to another state to live with her father. DCF accepted a report in October 2020 alleging educational neglect of the child later withdrawn for homeschooling, who was then 7.5 years old. At that time, the child was enrolled in remote learning due to COVID but was not participating consistently. The parent had difficulty helping the child access the remote platform. DCF assisted with communication between the school and the parent. The school visited the home to assist the parent in understanding the remote platform. DCF referred the family to Integrated Family Care and Support (IFCS), an in-home support service, and closed the case. There are no accepted reports after that date, meaning that either the school district did not make a report to DCF at the time of the withdrawal or a report was made but not accepted and subsequently expunged.

Given the family's history and prior significant concerns about the capacity of the mother (who is the sole caregiver), OCA is concerned that the child may not be receiving educational instruction.

Case Example 2

Date of Withdrawal for Homeschooling: June 30, 2024

Date of Most Recent Prior DCF Report: April 5, 2024

A child, age 9, was removed from school in June 2024 for the stated purpose of homeschooling, while DCF had an open case for substantiated educational neglect. LINK records revealed that the family had 21 accepted reports between 1998 and 2024, with allegations of substance abuse, domestic violence, neglect, and educational neglect. Three of the reports were substantiated, one for emotional neglect of an older sibling due to exposure to intimate partner violence in the home in 2004.

DCF twice substantiated for educational neglect of the youngest child, who was diagnosed with Autism and later withdrawn for the purpose of homeschooling. The first substantiation for educational neglect occurred after a referral from the school district in 2021. The parent reported that the two older children were in online school (homeschool) and showed DCF a receipt for payment for an online school. The parent reported that her younger child did not like school, got sick often, and could become aggressive when he was sick. Following an investigation, DCF substantiated for educational neglect and kept the case open for nine months. DCF identified a need for in-home services to support the child and the need for an educational advocate to ensure the child had an appropriate educational program, made referrals for the same, and closed its case.

In 2024, the school made another report due to the child's ongoing excessive absences. DCF substantiated educational neglect and opened the case for ongoing services. The parent had not followed up on the previous referral to obtain ABA services. The educational advocate had concerns about the parent's follow through. DCF ensured that the parent followed through with contacting Carelon to obtain ABA services.

According to DCF's records, the parent decided to homeschool and the child was withdrawn from public school in October 2024. The parent indicated a plan to enroll the child in a home school program that identifies itself as a community assisted homeschool. At the time of case closure, the family was still waiting for receipt of ABA services through Carelon, and DCF contacted the provider to confirm the child was on the waitlist. The child's last IEP with the school district called for 20 hours of ABA intervention, behavioral modifications 1 hour monthly, Occupational Therapy Services for 45 minutes weekly, and Speech Services for 4 hours per month. DCF advised the parent to talk to the pediatrician to get referrals for outpatient speech/language and occupational services. DCF then closed its case at the end of October 2024.

OCA learned that the family did not receive ABA services through Carelon as their case was closed in November 2024 due to lack of contact with the parent despite attempted outreach.

Given that ABA services were not in place, and mother had not previously followed through with recommendations, OCA is concerned about whether this child is receiving educational instruction and whether he is receiving adequate intervention for his challenging behaviors.

Case Example 3

Date of Withdrawal for Homeschooling: May 16, 2024

Date of Most Recent Prior DCF Report: May 9, 2024

Report After Withdrawal for Homeschooling: June 12, 2024

One child, age 7, was withdrawn from school for homeschooling just days after a school employee made a report to DCF alleging that some of the children were being driven without proper car seats/restraints. The allegation was not substantiated as the children denied being transported without being properly restrained and the worker observed proper car seats. The case history raises concerns. There are 8 children in the family, ranging in age from 3 to 15. Three of

the children, including the 7-year-old who was withdrawn, were noted to receive special education services. The family has 12 accepted reports, including substantiated allegations of inadequate supervision and moral neglect. Both parents have jobs requiring possession of firearms. The father has a history of alcohol misuse. The most recent substantiated allegation involved father leaving firearms within reach of the children during a mental health crisis. The father and his attorney met with DCF, indicated he was obtaining in-patient treatment, and agreed to cooperate with the investigation. The mother refused to sign authorizations. DCF substantiated the allegations and offered Intensive Family Preservation (IFP) services, with a plan to file petitions in court if the family did not cooperate. The parents agreed to participate in IFP, but continued to refuse to sign authorizations to allow DCF to contact the children's medical providers or the school. The father signed authorizations to allow DCF to confirm his participation in therapy. At the time of case closing, DCF determined there was no legal sufficiency to file petitions and noted that the family successfully completed IFP and provided DCF with "records supporting that the children were medically and educationally compliant."

Nothing in the DCF record indicates that DCF was notified, either by the school or the family, that the seven-year-old child was being homeschooled. None of the worker's observations during home visits indicated that the child was being homeschooled. While the parents stated on one occasion they were going to "look into homeschooling," an entry at the time of closing, four months after the child's withdrawal from school, stated that the child has an IEP and takes a specialized bus to school.

Case Example 4

Date of Withdrawal for Homeschooling: November 13, 2023

Date of Most Recent Prior DCF Report: March 15, 2023 (closed February 2024)

An 11-year-old child was withdrawn nine months after the last report to DCF. The family was the subject of 11 accepted reports between 2009 and 2023. There are two substantiated reports of sexual abuse of two of the children (by two different adults at different times), a history of intimate partner violence, and multiple reports of educational neglect of older siblings. The mother has a history of mental health needs. The most recent substantiation was in 2023 for educational neglect of an older sibling. Throughout that case, the mother minimally cooperated with DCF and refused to sign releases to allow DCF to communicate with the school. DCF substantiated educational neglect and filed petitions in court; mother obtained an attorney; and the case was scheduled for trial. Shortly before trial, mother obtained a different attorney and signed an authorization only for the child who was subject of the petition and only for the purpose of confirming school attendance. The attorney allowed DCF to visit the child who was subject of the petition (but not other children in the home), provided letters from the child's mental health provider confirming diagnoses and treatment, and letters from medical providers showing the child was up to date with basic medical and dental care. At the time of case closure, DCF noted that the child who was subject of the report was in attendance and that there had been no new reports to DCF.

Because DCF was not able to obtain authorizations from the parent, DCF was not aware that the 11-year-old sibling was withdrawn from school for the stated purpose of homeschooling while

DCF's case regarding the sibling was pending. Given the substantiation for educational neglect of an older sibling, OCA is concerned that the 11-year-old child may not be receiving educational instruction.

Case Example 5

Date of Withdrawal for Homeschooling: August 29, 2023

Date of Most Recent Prior DCF Report: April 17, 2023 (closed June 2023)

A 10-year-old child was withdrawn for the stated purpose of homeschooling two months after DCF closed its investigation. Review of LINK records showed five prior accepted reports, with one substantiation in 2014 for physical abuse of the child (then five months old).

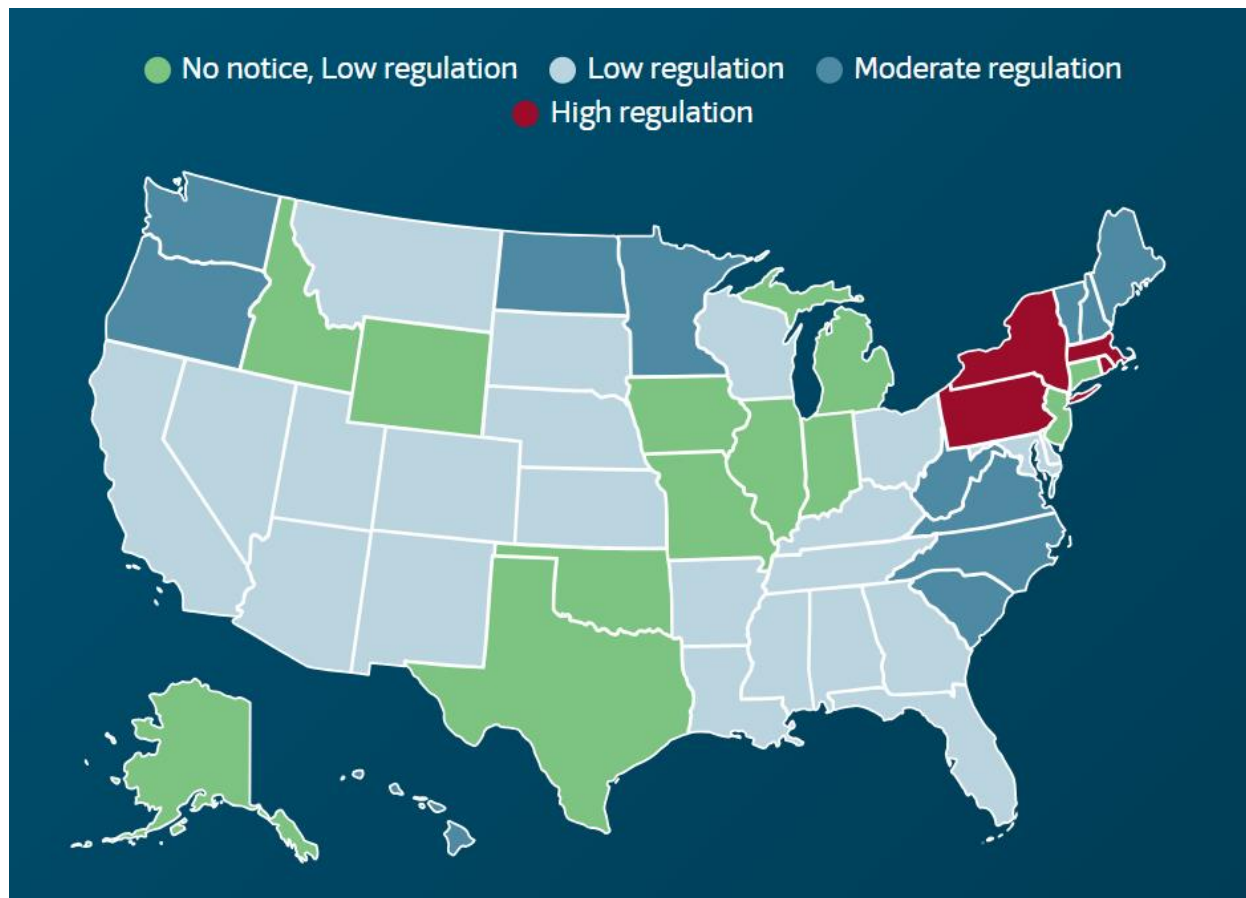
In March 2023, DCF received a report for educational neglect, indicating that the 10-year-old child had 32 absences and had attendance issues since kindergarten. DCF accepted the case as a Family Assessment Response. The parents reported that the child's attendance was impacted by the father's serious chronic illness and the fact that the mother does not drive. The mother speaks very limited English making communication with the school challenging. The child reported being bullied at school but the school could not verify that report. The Family Assessment Response was resolved with a plan for the adult sibling to be the point of contact for the school and to assist with getting the child to school. In April 2023, while the educational neglect allegation was still being assessed, DCF received another report alleging physical neglect. DCF investigated and did not substantiate. The mother denied having mental health issues but had a history of mental health needs and agreed to go to therapy. DCF closed its case in June 2023. The child was withdrawn for the stated purpose of homeschooling in August 2023.

Given the mother's identified needs, the father's serious chronic illness, and the history of difficulties with ensuring the child's attendance in school, OCA is concerned about whether the child is receiving educational instruction.

V. CONNECTICUT STANDS ALONE IN NEW ENGLAND

Connecticut is one of only 12 states with no meaningful regulation of homeschooling. HSDLA, an organization that advocates for homeschooling, provides extensive data and information on what different states require and assigns a level of regulation based on their review of the state's legal requirements. The four categories are "no notice, low regulation; low regulation; moderate regulation; high regulation." Connecticut is the only state in New England identified as requiring no notice. Massachusetts, and Rhode Island are considered high regulation. Maine, New Hampshire, and Vermont are considered moderate regulation. All of them require some form of annual evaluation and two require pre-approval of the parent's homeschooling plan before the parent is permitted to homeschool. New York also has

extensive homeschooling requirements.



Source: [HSLDA Advocates for Homeschooling](https://hsllda.org/advocates-for-homeschooling)

Massachusetts

In Massachusetts, parents may not homeschool their children unless the school committee of their local school district has first approved their homeschooling plan.²² The specific requirements vary by town but the Massachusetts Department of Education indicates that “[d]istricts typically review a proposed home schooling plan for the content, instructional materials, duration and frequency of instruction, methods of instruction, evaluation, and whether it enables the child to make adequate progress in the areas that Massachusetts identifies as essential. The school district must communicate its decision to the parent, preferably in writing, within a reasonable period after receipt of the parent's home schooling plan.”²³ Parents must submit a notice of intent to homeschool annually and have an opportunity to explain their proposed plan and, if not approved, an opportunity to remedy the plan’s inadequacies.²⁴ In obtaining the superintendent's or the school committee's approval, “the parents bear the responsibility of demonstrating that the home school proposal meets the requirements of G. L. c.

²² [MGL 76, § 1](#). See also [Homeschooling, Massachusetts Department of Elementary and Secondary Education](#).

²³ [Home Schooling - Massachusetts Department of Elementary and Secondary Education](#).

²⁴ [Care and Protection of Charles, 399 Mass. 324 \(1987\)](#).

76, Section 1, in that the instruction will equal "in thoroughness and efficiency, and in the progress made therein, that in the public schools in the same town" ²⁵

In considering proposed plans, school committees may consider:

- the proposed curriculum and the number of hours of instruction in each of the proposed subjects;
- the length of the proposed home school year and the hours of instruction in each subject; and
- the academic credentials or other qualifications of the parent or parents who will be instructing the children.

The superintendent or school committee must also have access to the textbooks, workbooks, and other instructional aids to be used by the children and to the lesson plans and teaching manuals to be used by the parents. School committees or superintendents "may properly require periodic standardized testing of the children to ensure educational progress and the attainment of minimum standards" or "other means of evaluating progress." ²⁶ A child who is removed without an approved homeschooling plan is considered truant. ²⁷

Rhode Island

Rhode Island requires that every child enroll in public school. Children may only be homeschooled if they are first enrolled in the district and their plan for homeschooling is "approved by the school committee of the town where the child resides." ²⁸ If the family moves to a different town, the parent is required to enroll the child in school in that town and that town would then be responsible for monitoring the homeschooled student's attendance and academic progress. The process for approval by the school committee includes a process to determine a method of evaluation of the student's academic progress. ²⁹ If the parent's plan is not approved, the parent has a right to appeal to the Rhode Island Department of Education. ³⁰ Parents must regularly submit reports to the superintendent of their school district. ³¹

Vermont

In Vermont, also considered by HSLDA to have moderate regulation, requires that parents annually provide a notice of intent to the Vermont Agency of Education. Parents must attest that they will have the child assessed annually and maintain record of such assessment. Assessment may be completed in one of the following ways:

²⁵ [Care and Protection of Charles, 399 Mass. 324 \(1987\)](#), citing See Matter of Kilroy, 121 Misc. 2d 98, 101.

²⁶ [Care and Protection of Charles, 399 Mass. 324 \(1987\)](#).

²⁷ [Home Schooling - Massachusetts Department of Elementary and Secondary Education](#).

²⁸ [R.I. Gen. Laws § 16-19-1](#).

²⁹ [Homeschooling | RI Department of Education](#), accessed April 26, 2025.

³⁰ [R.I. Gen. Laws § 16-19-1](#).

³¹ [Homeschooling | RI Department of Education](#), accessed April 26, 2025.

- (a) a standardized assessment, which may be administered by the local school district or a testing service or administered in a manner approved by the testing company;
- (b) a review of the student's progress by an individual who holds a current Vermont teacher's certificate;
- (c) a parent or guardian report and portfolio to include a summary of what the student learned during the school year and at least four samples of student work;
- (d) grades from an online academy or school; or
- (e) evidence of passing of the GED.³²

For each child not previously enrolled in school or in a home study program, the parent must provide "independent professional evidence regarding whether the child has a documented disability and how the disability may affect the student's educational progress in a home study program."³³

New Hampshire

In New Hampshire, considered a moderate regulation state, the parent must give notice to the Commissioner of the State Department of Education, the resident district superintendent, or principal of a nonpublic school.³⁴ If the parent moves to another district, they must again provide notice.³⁵ The parent must maintain a portfolio of records, must include "a log which designates by title the reading materials used, and also samples of writings, worksheets, workbooks, or creative materials used or developed by the child."³⁶ This must be preserved by the parent for 2 years of the date of ending the home instruction. The parent must have the student evaluated annually to demonstrate "educational progress at a level commensurate with the child's age, ability, and/or disability."³⁷ The evaluation must be one of the following:

- (a) A certified teacher or a teacher currently teaching in a nonpublic school who is selected by the parent shall evaluate the child's educational progress upon review of the portfolio and discussion with the parent or child;
- (b) The child shall take any national student achievement test, administered by a person who meets the qualifications established by the provider or publisher of the test;
- (c) The child shall take a state student assessment test used by the resident district; or
- (d) The child shall be evaluated using any other valid measurement tool mutually agreed upon by the parent and the commissioner of education, resident district superintendent, or nonpublic school principal.³⁸

³² 16 V.S.A. § 166b(a)(3).

³³ 16 V.S.A. § 166b(a)(4).

³⁴ RSA 193-A:5.

³⁵ Id.

³⁶ RSA 193-A:6

³⁷ Id.

³⁸ Id.

Maine

In Maine, parents must notify the district of their intent to homeschool. The notice of intent to homeschool must be filed annually and must include assurances that instruction will occur at least 175 days annually, will include certain subjects, and will include an annual assessment of the child's progress utilizing a form of evaluation authorized in the statute.³⁹ Several forms of annual assessment are permitted:

- A standardized achievement test administered through the administrative unit in which the student resides or through other arrangements approved by the commissioner.
- A test developed by the school officials of the administrative unit in which the student resides appropriate to the student's home instruction program, which must be agreed to by the school officials of the administrative unit prior to submission of the written notice of intent to provide home instruction;
- A review and acceptance of the student's progress by an identified individual who holds a current Maine teacher's certificate;
- A review and acceptance of the student's progress based on, but not limited to, a presentation of an educational portfolio of the student to a local area homeschooling support group whose membership for this purpose includes a currently certified Maine teacher or administrator; or
- A review and acceptance of the student's progress by a local advisory board selected by the superintendent of the administrative unit in which the student resides that includes one administrative unit employee and 2 home instruction tutors. For the purpose of this subdivision, a "home instruction tutor" means the parent, guardian or other person who acts or will act as a primary teacher of the student in the home instruction program. This provision must be agreed to by the school officials of the administrative unit in which the student resides prior to submission of the written notice of intent to provide home instruction.⁴⁰

New York

In New York, considered a high regulation state, there are extensive requirements including providing an Individualized Home Instruction Plan (IHIP) that includes, among other things, the syllabi, curriculum materials, and textbooks or plan of instruction.⁴¹ Specified subjects must be taught. The IHIP must be reviewed for compliance with the requirements and may be rejected for non-compliance.⁴² Parents must submit annual notice of intent to homeschool, maintain attendance records, and submit quarterly reports.⁴³ The parent must submit an annual

³⁹ [M.R.S. 20-A §5001-A\(3\)\(A\)\(4\).](#)

⁴⁰ Id.

⁴¹ 8 CRR-NY 100.10(d).

⁴² Id.

⁴³ 8 CRR-NY 100.10.

assessment that includes “results of a commercially published norm referenced achievement test,” and is administered by specifically enumerated qualified professionals, or an alternative evaluation, which must include a written narrative prepared by “a New York State-certified teacher, a home instruction peer group review panel, or other person, who has interviewed the child and reviewed a portfolio of the child's work.”⁴⁴ If the child’s annual assessment is inadequate, the home program may be put on probation for up to two school years, during which the parent is required to submit a plan of remediation.⁴⁵ There are administrative procedures in place if the parent disagrees with a district’s determination regarding the IHIP or determination regarding the student’s progress.

VI. CONCLUSION

Currently, parents who wish to withdraw their children from school need do nothing more than assert that they are homeschooling or sending their children to private school. Once a parent does that, there is no further interaction with the public school system required. There is no verification of enrollment in private school. There is no verification that a child is, in fact, being homeschooled.

When a child is withdrawn for the stated purpose of homeschooling, this generally does not come to the attention of DCF because the act of withdrawing alone is not an adequate basis for filing a report with DCF. When there is a report to DCF, it is, at times, the absence of regulation that confounds the child welfare system. While the statute requires that parents be able to show that the child is elsewhere receiving equivalent structure, CSDE’s existing guidance provides only suggestions for annual enrollment and portfolio review. There is no required follow up of any kind. Without any required steps to show that the child is receiving instruction, DCF is sometimes stymied. If the allegation made to DCF is solely educational neglect, and the parent states they are homeschooling, DCF may make inquiries to seek confirmation of homeschooling, but they may have no legal basis to take further action. As evident in some of the case examples above, DCF investigations can also be impacted by the parents’ level of cooperation. Where parents exercise their right not to provide DCF with any information, DCF may not have sufficient information to take action. For these reasons, improving the quality of DCF’s investigations alone will not fully address this gap.

OCA’s 2025 sampling of statewide data of students who were withdrawn for homeschooling yielded results similar to OCA’s findings when it reviewed data from six districts in 2018. Nearly one-quarter of families of students withdrawn for homeschooling had at least one accepted DCF report and approximately 8% percent had four or more accepted DCF reports. In our 2025 data review, we found that approximately 10% of the families had at least one substantiation, including substantiations for physical abuse, physical neglect, and educational

⁴⁴ 8 CRR-NY 100.10(h).

⁴⁵ 8 CRR-NY 100.10(h) and (i).

neglect.

Homeschooling, when done properly, can be a positive experience for children and families. Many families successfully homeschool their children. Homeschooled children can be found on college campuses across the country and are represented in all professions. Nothing in this report is a general criticism of homeschooling nor a suggestion that children should not be homeschooled. Nonetheless, not every parent who withdraws their child for the stated purpose of homeschooling is, in fact, providing their children with an education. Worse, some take advantage of Connecticut's complete lack of oversight to isolate children and abuse them. Once a child is withdrawn from school, children are removed from regular contact with mandated reporters. It is this ability to isolate a child that results in the greatest risk. Connecticut must grapple with that reality.

There is no doubt that parents have a right to direct the education of their children. Courts have recognized, however, that this right is "not absolute" and must be reconciled with the "substantial State interest in the education of its citizenry."⁴⁶ Parents' right to homeschool must also be balanced with the interests that children have in receiving an education and being free from abuse and neglect.

Connecticut is one of very few states that does not have any requirements related to homeschooling. Connecticut is the only new England state where a parent can simply notify the district they are withdrawing their child for homeschooling and do nothing more. Every other New England state requires some form of annual evaluation or assessment. Connecticut can and must establish standards that ensure that children actually receive instruction while also respecting parents' ability to choose to provide equivalent instruction through homeschooling.

VII. RECOMMENDATIONS

OCA recommends the following:

1. Amend Connecticut General Statutes § 10-184 to describe how the parent must be "able to show that the child is elsewhere receiving equivalent instruction in the studies taught in the public schools." OCA recommends that this include: that the parent and child appear annually to provide enrollment documentation, that the child be independently evaluated annually for academic progress, and that the parent provide initial and periodic assurances that the child is in good health. For children receiving equivalent instruction in a private school, annual proof of enrollment in the private school should be sufficient.

⁴⁶ [Care and Protection of Charles, 399 Mass. 324, 334 \(1987\).](#)

2. OCA recommends that the annual evaluation requirement include a list of options for independent evaluation of academic progress from which the parent may choose. This would allow the parent to select a form of evaluation that is most consistent with their choices regarding homeschooling and ensure that there are appropriate options for children with disabilities. Policy makers may look to New Hampshire and Maine for examples.
3. Add a statutory requirement that districts, upon receipt of a notice of intent to homeschool, conduct an internal assessment to determine if the district previously made reports of suspected abuse and neglect and, based on the totality of the information known to the district, determine whether such notice gives rise to a reasonable suspicion that a child is abused or neglected and should be reported to DCF.
4. Following amendment to the statute, DCF should review its acceptance criteria and update the operational definition of educational neglect to ensure that it is consistent with updated law. DCF should provide guidance and training on what is required for homeschooling and how the caseworker should assess to determine whether a child is in fact being homeschooled.