



Small School Districts' Association

PO Box 276045  
Sacramento, CA 95827  
Tel: (916) 662-7213  
[www.ssda.org](http://www.ssda.org)

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**SSDA OFFICE**  
**Timothy J. Taylor, Executive Director**  
(916) 662-7212; [tim@ssda.org](mailto:tim@ssda.org)

**Corrie Pelc, Director of Member Services**  
(916) 662-7213; [corrie@ssda.org](mailto:corrie@ssda.org)

**Taylor Smith, Marketing Assistant**  
(916) 662-7213; [taylor@ssda.org](mailto:taylor@ssda.org)

June 23, 2021

Bradley Johnson, Superintendent/CBO  
Dehesa School District  
4612 Dehesa Rd  
El Cajon, CA 92019

Dear Superintendent Johnson:

After the very successful outcome of the 2019-20 Professional Services Agreement (PSA) between Dehesa School District and the Small School Districts' Association (SSDA) to provide support for charter school oversight, I was confident that SSDA could again provide quality service to your District. However, I've been pleasantly surprised at the level of greater success and quality of service from the 2020-21 PSA; the synergy that came from the collaboration of the charter schools, the District, its legal services, and SSDA has brought district authorizers' oversight of charter schools to a whole new level. Kudos to you and your Board for forging a path through the maze of issues that charter school oversight presents to all authorizing school districts. The governance teams of other such districts now have an example to follow.

I recently attended a meeting with legislative staff, two other statewide associations and a member from the state board of education. The meeting purpose was to discuss non-classroom-based charters and effective oversight practices to ensure schools are being monitored properly. A staff member from Assemblymember Patrick O'Donnell's office commented that the work that was Dehesa was doing is what the other districts should use. They were that impressed from your report last year.

You are to be commended for the work done last summer to improve the design of last year's prototype. Bringing all the stakeholders together to improve the phases of the process allowed for recruiting two new team members, staggering document reviews to align timelines, adjusting the interviews and timelines to online effectiveness and digitally sharing files made for a much smoother process this year. The fact that this was done in the midst of a pandemic makes it all the more remarkable.

The relationships and mutual respect of all the stakeholders in this oversight process increased in strength and depth, making it easier to adjust the oversight process toward improving effectiveness and better outcomes for teaching and learning of students. At the Small School Districts' Association, we are honored to have become a partner with you and all your schools as we all work to continuously improve public education. We look forward to providing more successful service to you in our future together.

Sincerely,

Tim Taylor  
Executive Director  
Small School Districts' Association (SSDA)

# **Dehesa Charter Oversight Report**

**June 23, 2021**

**Prepared by the SSDA  
Charter Oversight Team  
for Dehesa School District**

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# Introduction

## Background

According to Education Code 47,600 et seq. charter school authorizers must fulfill certain minimum oversight requirements. The Education Code lacks detail on how these requirements are to be met. To address this problem, the Dehesa School District (District), in consultation with legal counsel, established a multipronged charter oversight process that will allow for greater consistency and uniformity in application and provide objective evidence of legal compliance. Given the significant charter reform efforts at the state level, these charter oversight materials are reviewed and updated on an annual basis to ensure they align with any new legal requirements. The 2019-2020 school year was the first time this oversight process was implemented. These materials and process for the 2020-2021 school year have been slightly revised or adjusted to address changes in legal requirements applicable to charter schools, as well as other practical, logistical, or other considerations prior to this school year.

The greatest of these considerations and adjustments for this 2020-2021 Dehesa Charter Oversight Report have been adapting to the COVID-19 pandemic. Compared to last year, very few face to face interviews took place this year. Virtual meetings were held often and COVID-19 precautions were followed. In some cases, due to the COVID-19 precautions taken by the charter schools, oversight adjustments changed greatly, such as in situations where resource centers were closed to students and staff.

To implement the oversight process again, the District entered into an independent contractor agreement with the Small School Districts' Association (SSDA) to provide professional services to the District for improved charter school oversight using the District's oversight model. The SSDA created an SSDA Charter Oversight Team (SSDA COT) of experts whose background is provided under the "**SSDA Charter Oversight Team**" heading in this Report.

The District governance team, during the development and initial implementation of the Dehesa Charter Oversight Documents process, is to be commended for maintaining its focus on oversight improvement while experiencing severe budget adjustments and the COVID-19 pandemic precautions. The District, SSDA, and charter school staff are also to be commended for their flexibility and focus in the pursuit of improving the oversight of the District's charter schools. The greatest difference between the 2019-2020 and 2020-21 oversight processes was the improved communication between SSDA and the charter schools. A very significant improvement was the use of digital files instead of hard copies, and sharing those files electronically. Also, a better understanding of the oversight by all parties involved resulted from the awareness provided by the 2019-2021 oversight experience. Continuity in District leadership also helped the oversight greatly.

## Scope and Process of Oversight

Again, using the District's Updated Dehesa Charter Oversight Documents, the SSDA COT provided the Dehesa School District (District) the service of assessing each of the five charter schools under the District's authorization. The charter schools were:

- The Heights Charter
- Method School
- Diego Hills Central
- Cabrillo Point Academy
- Pacific Coast Academy

Using the District's charter oversight process, each of the charter schools were evaluated by the SSDA COT in the following six principal areas during the 2020-2021 school year:

- Governance
- Finance/Business
- Personnel
- Educational Program/Student Services
- Special Education
- Facilities/Operations

To begin the oversight process, during the summer of 2020 the District met with the SSDA COT to debrief the 2019-2020 process experience and make adjustments for the 2020-2021 oversight process. Beginning in late October 2020, the District requested from the charter schools a series of documents showing compliance in the six principal areas. Beginning in mid De-

ember 2020, in the second phase of the process the SSDA COT conducted a detailed compliance review of each set of charter school documents requested by the District. In mid January 2021 the District arranged virtual meeting visits for the DCOT to meet with key charter school personnel, board members, and parents/ guardians of students (as applicable), while completing relevant parts of the master charter oversight checklist. Based on these interviews, and review or analysis of the documentation submitted by the charter schools, the applicable portions of the master charter oversight checklist was assessed for compliance. Due to the COVID-19 pandemic, the visits toward the end of this phase took place mostly online. Considering that the majority of these schools operated in virtual environments, this was a fairly easy adjustment to the oversight process.

Beginning in late March 2021 the fourth phase started when the SSDA COT wrote draft reports evaluating each charter school's compliance in the six principal areas based on the Checklists. These drafts considered any Notice of Concerns given by the District to the charter schools in the Fall of 2020 that addressed issues from the 2019-2020 Report. The SSDA COT reviewed the Notices of Concerns to evaluate whether the charter schools had addressed the issues raised therein. The Checklists were then used to check for any current concerns and/or suggest practices to help improvement in the charter schools. These SSDA draft reports were then provided to the charter schools to review the portions relevant to their school.

In the fifth phase, the District and SSDA received feedback from the charter schools, and updates were made to the report, as appropriate, before it was finalized. Once finalized, the District made the written reports available to the District's governing board, the charter schools, and the public. The reports specify concerns and best practices, recommendations and/or corrective actions to be taken by the charter school.

## **Dehesa Charter Oversight Team**

### **Gail Ann Greely, Governance Lead**

Gail Ann Greely is retired from the Alameda County Office of Education where she served as the Director of ACOE's Charter Authorizers Regional Support Network (CARNet) program — a federally-funded grant program designed to support and train charter authorizing staff throughout the state. Prior to taking on the CARNet program, Gail was the Director of ACOE's Charter Schools Office, and before that, oversaw the charter authorizing office at Oakland Unified School District. She was a founding board member and President of California Charter Authorizing Professionals. Gail also served in leadership roles for two non-profits that operated charter schools in the Bay Area. She was inspired to make a career switch into public education by her time as an elected school board member in the City of Alameda, after working for many years in energy law and regulation.

### **Tom Krzmarzick, Finance/Business Lead**

Tom Krzmarzick retired as the Assistant Superintendent, Business & Administrative Services from the Bonsall Unified School District. Mr. Krzmarzick recently served as a Board Member for the Elite Academic Academy Charter School, Mountain Empire. Prior to serving at the Bonsall Unified School District, he served as a Financial Consultant for the San Diego County Office of Education reviewing school district fiscal reports and financial health. In addition to reviewing school district's fiscal condition for SDCOE, he developed SELPA Allocation Plans for the East County SELPA and South County SELPAs in San Diego County. Before serving at the San Diego County Office of Education, Mr. Krzmarzick served as CFO for an educational development and support corporation, ETS Pulliam. Mr. Krzmarzick also served as a Consultant for the San Bernardino County Superintendent of Schools Office in the Business Services Department, as well as serving as Chief of Staff for the Superintendent of Schools for San Bernardino County. Before working in the public school arena, Mr. Krzmarzick served as the Whitehead College Business Manager for the University of Redlands. Mr. Krzmarzick began his career at TRW in Rancho Bernardo, CA serving in various fiscal analysis, project control and business management positions.

### **Cynthia Free, Personnel Lead**

Cynthia Free has 38 years of experience in Educational Services, 31 years being at San Diego County Office of Education HR/Credentials and Livescan Services Department. Her expertise in California state education codes and regulations, payroll, data collection, state audit and accountability are recognized by county human resources and credential departments throughout the state of California. Cynthia's connection and incisive thinking of HR functions in both certificated and classified employment allowed her to create a favorable relationship between the various school district offices and the San Diego County Office of Education.

Because of her knowledge and frontline contact with HR staff, administrators and Superintendents, she was invited to serve on numerous educational task forces, committees, and boards throughout the state. These included the California Commission on Teacher Credentialing (CCTC), California Department of Education (CDE), Personnel Administrators Steering Services Committee

(PASSCo), and Credentials Counselors and Analysts of California (CCAC). Her knowledge of the day-to-day functions of district administrators and staff is invaluable.

As a frontline oversight auditor for CCTC and CDE, her focus was to discover discrepancies in certificated and classified employee positions and correct the situation through legal avenues in the California Education Code, support the superintendents in this process, and bring employment practices to their attention. Cynthia developed and implemented training workshops and seminars that were presented to San Diego district offices and other county credential offices to assist in their employment procurement procedures in order to stay in compliance with state assignment monitoring. She developed reporting procedures recognized and shared throughout the state with other county offices. She is recognized throughout the state for her incisive forward-thinking regarding teacher credentialing.

### **Kathy Granger, Ed.D, Educational Program & Student Services Lead**

After a 35 year career in education, Dr Granger recently retired from serving as the Superintendent of the Mountain Empire Unified School District where she also provided oversight for several charter schools. With additional background as an assistant superintendent and director in Human Resources, Kathy also brings a wide range experience of district office support, site administration, teaching mathematics, and working in large as well as small school districts.

### **Alicia Alvarez, MA, BCBA, Special Education**

Alicia Alvarez has worked in the field of special education for the past 23 years. She began working as an instructional assistant while completing her BA in psychology. Working in a moderate/severe classroom inspired her to switch her focus to education, with an emphasis in working with students with significant disabilities, autism and behavioral challenges. In addition to holding a Masters in special education, Alicia is also a board certified behavior analyst (BCBA) and is completing her clear credential in educational administration.

Alicia taught in a moderate/severe classroom in San Diego Unified School District for 7 years before becoming a Program Specialist overseeing the Autism Coordinated Education Team in Chula Vista Elementary School District. When the team was disbanded after four years due to funding, Alicia went back to the classroom as a resource specialist. During this time, Alicia also began working for the San Diego County Office of Education, supporting teachers who were obtaining their Autism Authorization through SDCOE. This work led Alicia to another program specialist position with the North Coastal Consortium for Special Education (NCCSE) In this role, Alicia supported the special education department in the Oceanside Unified School District. In Oceanside, Alicia supported special education teachers and programs, providing training in evidenced based practices, IEP compliance, behavioral supports, and alternate curriculum and assessment for students with moderate/severe disabilities. Alicia spent five years in Oceanside before obtaining a coordinator position with NCCSE. As a coordinator, Alicia supervised the itinerant teachers of the Deaf and Hard of Hearing (DHH) as well as the preschool, elementary and high school DHH programs. This past year, Alicia transferred to the East County SELPA to be closer to home. She continues to supervise the SELPA itinerant staff and is also the special education coordinator for Dehesa School District.

### **Justin Cunningham, Ed.D, Facilities/Operations Lead, Project Lead**

Over the past 42 years, Dr. Justin Cunningham has served public education at the site, district, county, regional or state levels. Fifteen of those years were with the San Diego County Office of Education providing services to small school districts, many with charter schools. During nine years as Superintendent of the Bonsall Unified School District, Dr. Cunningham also served, authorized, and revoked charter schools.

Dr. Cunningham was Chair of the Writing Committee for the 1993 Health Framework for California Public Schools, a 1999 Distinguished Educator for the California Department of Education, the Small School Districts' Association's 2013 Outstanding Superintendent of the Year, and the Classroom of the Future Foundation's 2017 Innovative Superintendent of the Year.

Dr. Cunningham is a Personnel Commissioner for the San Dieguito Union High School District, and an independent contractor serving school districts and charters with superintendent searches, board workshops, administrative coaching, and as Project Lead of the Small School Districts' Association's Charter Oversight Team.

## General Principal Area Considerations

Rather than repeat a principal area consideration or Best Practice that would be written over again in each of the reports for the different charter schools, it seemed prudent to provide a general consideration for each principal area below.

### Governance

#### Best Practices:

The following suggested changes in governance may support the further improvement of all charter schools currently authorized by Dehesa:

- Review of Form 700s provided by all of the Dehesa-authorized charter schools revealed substantial inconsistencies in interpretation and application of the relevant legal requirements. Some schools appeared to under-report and others to over-report. It is suggested that Dehesa clarify its expectations or facilitate training for charter board members (perhaps through San Diego County) to ensure consistent reporting. If interpretations of Form 700 reporting diverge from common practice, this should be noted.
- To varying degrees, all Dehesa-authorized charter schools struggled with the use of telephone and videoconference meetings during the pandemic. As it is likely that these formats will continue in use, developing good practices is worthwhile. Consistent practices that may enhance the experience for all participants include: introducing board and staff members present (by name and position), describing the procedure for public comment and ensuring that speakers are identified verbally when cameras are off or labels on Zoom windows do not show participant names.
- It is good practice to periodically review and update adopted board policies. Although the numbers varied, all schools appeared to have some out-of-date policies. Many policies were undated with no notation as to board approval of updates or revisions. (Some employee and parent/student handbooks were also without approval and/or revision dates.) The task of updating policies could be undertaken by a board committee, with staff support, and thereby enhance learning for newer board members.
- Board meeting observations were conducted during the period when charter schools select their independent auditors for the year. Over the past few years, the importance of quality independent audits, including review of internal controls, has become more evident, especially among non-classroom-based charter schools. Audit reports and management letters can be important tools for oversight by the board. Two practices that may support governing boards in future selection of auditors and effective use of the auditing process are additional training for the board treasurers and, particularly for the smaller boards, creation of an audit committee with non-board members to provide additional expertise.

### Finance and Business

#### Best Practice:

The following suggested changes in Finance and Business may support the further improvement of all charter schools currently authorized by Dehesa:

- Formally adding a section in the charter schools' Fiscal and Business Policy section of its Board Policies and Procedures a requirement for a Board Resolution and approval of the transfer/loaning of funds to other charter schools or to other entities. In prior years, a couple of the charter schools have contracted with an outside vendor or Charter School Management Organization (CMO) to provide administrative services to the charter school. The CMO's typically provide services to other charter schools or entities and in the past loaned or transferred funds between the charter schools they supported. To ensure the Board is fully aware of such transactions, including the requirement for a formal Board Resolution and approval in the charter schools' Board Policies and Procedures is suggested.

### Personnel

#### Best Practice:

- Bringing Personnel Actions to the Board for approval does not generally happen in these charter schools authorized by Dehesa. Creating a situation whereby the board members are aware when staff are hired provides information that would be good for them to know.

### Educational Program & Special Education

- There are no concerns shared by all schools.

## **Facilities and Operations**

### **Best Practice:**

- It was noted in The Heights oversight process that there was a section in their Safety Plan that covered precautions for pandemics like the flu. The Diego Hills Central Safety Plan included a COVID-19 Infection Control Plan. It could help to eventually update all the charter schools' Safety Plans to include COVID precautions.



# **Dehesa Charter Oversight Report**

## **The Heights Charter**

# The Heights Charter: Governance

## Context

The Heights Charter is a California public benefit corporation, approved as a 501(c)(3) tax exempt non-profit by the IRS. It is governed by a 6-member board of directors (bylaws provide for 5 to 7), 2 members of which are current employees of the school. (The school's director previously served as a 7<sup>th</sup> member of the board. The vacancy left by her September 2020 resignation has not yet been filled.) The school is led by its founder.

## Compliance Area Concerns

Since the 2019-2020 charter review, the school has updated bylaws and policies, and recently made efforts to engage parents and community members in governance and school decision-making. No areas of "high" concern were noted in this year's review. The following "low" level concerns were noted:

- Parent and community input in governance remains limited; effort made to date to promote public participation and parent engagement has not been fully successful. (Charter calls for a Parent Advisory Council.) School has not taken full advantage of virtual meeting format to engage more parents.
- Board member employment as school staff not disclosed in website bios. Officers and board terms not included. Compensation for board members was incorrectly reported to IRS on Form 990 from 2018-2019.
- Board has even number of members, despite commitment made in September 2020 to add a 7<sup>th</sup> member by December 2020. Language in the charter bylaws also indicates a preference for an odd number. (*Charter, p. 27; Bylaws Article VII. Section 3.*)
- Board member knowledge and experience not fully utilized, as suggested by lack of questioning and limited discussion in meetings. Lack of robust questioning and discussion may indicate lack of understanding or excessive deference to leadership and consultants. It may compromise accountability and effective oversight of the school.
- Closed session items not fully compliant: missing "report-out" and insufficient descriptions (not using "safe harbor" language).
- Public comment information on agenda fails to assure additional time for translation.
- Not all board-adopted policies are posted on website (as provided in MOU); location of key notices and policies not consistent or clear.

## Best Practices

The following suggested changes in governance may support the school's further improvement:

- Current leader evaluation employs a checklist with a standard of achievement at "meets expectations." A more robust process would use the leader evaluation to identify and advance student achievement and organizational goals, tied to a multi-year plan for school success. Shifting the leader evaluation to a more outcomes-based approach might also improve board member engagement by making the evaluation process less "personal" and more factual.
- Board may wish to explore ways to better take advantage of expertise of all board members and increase collective board expertise and engagement. Additional trainings, informal meetings with other charter board members, and assigning tasks to board members or committees are options to consider.
- As long as employees continue to serve on the board, issues will arise about the impact of school decisions on employees and the appropriateness of recusal. It is suggested that the school therefore review and refine its recusal policy annually.
- Adding a 7<sup>th</sup> board member presents an opportunity to expand the board beyond the current school community to add a fresh perspective, needed expertise or representation from communities of color. The process could be used to develop a matrix of board member knowledge and skills that would serve the organization as it grows and evolves to meet future challenges.

Assigned District Staff Person: Diana Whyte and Kristi Scherbaum  
 Position of Assigned Staff Person: Executive Director and Board Chair

**THE HEIGHTS CHARTER - GOVERNANCE OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Organizational Management</u></b>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<ul style="list-style-type: none"> <li>× Articles of Incorporation</li> <li>× Bylaws</li> </ul>	<u>Yes</u>	<u>No</u>	Bylaws are on school website; other documents available on request
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<ul style="list-style-type: none"> <li>× Bylaws</li> </ul>	<u>Y</u>	<u>No</u>	Bylaws components present; positive change made to create nominating committee for board vacancies, although not yet implemented
G3	Any changes to charter or bylaws have been approved by charter school’s governing board and submitted to the authorizer.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Changes made were approved by the governing board and certified by Secretary; were submitted to the authorizer as part of follow-up from prior year oversight report.
G4	Charter school has an organizational chart and job descriptions that delineate clear separation of duties and responsibilities.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Organizational chart</li> <li>× Job descriptions CEO/CBO</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	Financial services are contracted; may be helpful to define responsibilities of staff person handling the school’s liaison with CharterWise.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G5	Governing board has a robust, outcomes-based process for evaluating the charter school leader.	<ul style="list-style-type: none"> <li>× Most recent charter school leader evaluation</li> <li>× Board president interview</li> </ul>	<u>Y</u>	<u>No</u>	Difficult to gauge effectiveness of school leader evaluation from checklist that includes no areas for improvement or comments. Level of board involvement in setting outcomes unknown.
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> <li>× Executive director (or equivalent) interview <ul style="list-style-type: none"> <li>• Teacher interview</li> </ul> </li> <li>× Information available on charter school’s website</li> </ul>	<u>Y</u>	<u>Low</u>	Recent survey and outreach show effort being made to engage parents; Tracie H. is the current liaison to the Parent Association. Minimal efforts were made to engage parents at board meetings; board declined to change meeting times; and not using Zoom option to facilitate parent/community engagement. Over the course of a year, meetings record no public comment on agenda or non-agenda items.
<b><u>Composition</u></b>					
G7	Charter school has a list or roster of governing board members that is publicly accessible.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Information is available on charter school’s website</li> </ul>	<u>Y</u>	<u>Low</u>	Board member roster does not disclose which board members are also employees; no board terms or officer terms are included.
G8	Composition of governing board is consistent with approved charter.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>Low</u>	Consistent with bylaws, but charter says board will have odd number of directors (currently 6)

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G9	Governing board is diverse and reflects charter school and community population.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Description of school and community demographics</li> </ul>	<u>Y</u>	<u>No</u>	Governing board is not very diverse, but neither is the neighboring community or student body; diversity/representation not mentioned in charter’s board member selection criteria, which are repeated in the nomination committee policy; board has not yet implemented nominating committee process, so insufficient information to evaluate outreach efforts
G10	Governing board members have relevant knowledge and experience in key areas, such as education, finance, legal, real estate, and fundraising.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Information posted on charter school’s website</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>Low</u>	Unable to evaluate board member capacity because no questions were asked by and no discussion took place among board members during the observed meeting despite important topics such as 2 <sup>nd</sup> interim financial report; minutes show meetings are generally short despite major topics on agenda, and during the course of a full year only one board vote was not unanimous.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Completed Form 700s</li> <li>× Completed Form 990s</li> <li>× Agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of conflict of interest, although 2 of 6 board members are employees, which creates greater opportunity for conflicts to arise. Annual review of recusal policy and discussion of its interpretation could be helpful. To improve practice and transparency, could be helpful to include employment in board bios on the school’s website. Also ensure that compensation is correctly report to IRS (Form 990 from 2018-2019 erroneously shows no compensation for board members).
<b><u>Meetings</u></b>					
G12	Governing board conducts meetings as frequently as is needed to ensure that it addresses necessary charter school business, and such meetings are consistent with timelines set forth in charter and bylaws.	<ul style="list-style-type: none"> <li>× Annual governing board meeting calendar</li> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Board increased number of meetings given many issues related to pandemic; multiple special meetings called during the year.
G13	Governing board members receive annual training regarding Brown Act requirements.	<ul style="list-style-type: none"> <li>× Sign-in sheet from Brown Act training</li> <li>× Copy of materials (e.g., Power Point slides)</li> </ul>	<u>Y</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G14	Meetings are noticed and conducted in accordance with the Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of accessibility of meeting (location, online participation, public comment time, etc.)</li> <li>× Screenshot of charter school website</li> </ul>	<u>Y</u>	<u>No</u>	
G15	Discussion during Board meetings is limited to properly-noticed items on agenda.	<ul style="list-style-type: none"> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	Minutes show one item (resignation of ED from board) not-agendized and included after closed session. Board meeting observed did not address any non-agenda items and board members were clearly aware of restrictions.
G16	Board use of closed session during noticed meetings is consistent with Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>Low</u>	Items in closed session appear to be appropriate; however, notices not “safe harbor” language and no report-out included.
G17	Meeting agendas include sufficiently-detailed items of business to be transacted and any necessary action to be taken by the Board.	<ul style="list-style-type: none"> <li>× Sample meeting agendas</li> </ul>	<u>Y</u>	<u>No</u>	Agendas are sufficiently detailed

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G18	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	<ul style="list-style-type: none"> <li>× Sample meeting agendas</li> <li>× Public comment policy</li> </ul>	<u>Y</u>	<u>Low</u>	Basic public comment information on agenda but without reference to extra time for translation.
G19	Board members solicit and provide and/or solicit input from the community served.	<ul style="list-style-type: none"> <li>× Board biographies</li> <li>× Advisory committee/PTO documents</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>Low</u>	COVID-19 circumstances made community participation difficult. Minutes reference surveys about parental needs/wishes for instruction during pandemic; no other solicitation of input reflected in minutes or board observation; current meeting format, including time and absence of public Zoom link, plus absence of parent organization, raise concern about commitment to community participation.
G20	Minutes are approved and thereafter made available to the public.	<ul style="list-style-type: none"> <li>× Sample meeting minutes</li> <li>× Screenshot of charter school website</li> </ul>	<u>Y</u>	<u>No</u>	Minutes approved at subsequent regular meeting.
G21	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	<ul style="list-style-type: none"> <li>× Board meeting minutes</li> </ul>	<u>Y</u>	<u>No</u>	Special meeting of November 16, 2020



No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b>Board Policies [Note: The oversight team lead may request additional policies for review that are not listed here.]</b>					
G22	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<ul style="list-style-type: none"> <li>× Parent handbook</li> <li>× Student handbook</li> <li>× Employee handbook</li> </ul>	<u>Y</u>	<u>Low</u>	Board approved updates to employee and parent/student handbooks; some newly-adopted policies incorporated into employee handbook; however posting of policies on the school’s website is limited. Organization is unclear (2 under board; others in required notices) – better practice would be to collect and organize all board-adopted policies in one location.
G23	Governing board has adopted policies related to conflict of interest, which align with the requirements of Education Code section 47604.1.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	Recusal policy adopted as part of follow-up from prior year review meets requirements.
G24	Governing board has adopted/updated policies related to student discipline and due process.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	
G25	Governing board has adopted/updated policies related to complaints and investigations.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	Employee and parent/student handbooks include updated information about complaint procedures and forms for parents are on website. (Location within website could be improved.)

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G26	Governing board has adopted/updated internal control policies (and related forms and systems).	× Board policies	<u>Y</u>	<u>No</u>	
G27	Governing board has adopted/updated policies related to bank signature authorizations.	× Board policies	<u>Y</u>	<u>No</u>	Board updated signatures per policy when business management changed to new contractor
G28	Governing board has adopted/updated policies related to allowable purchases and purchasing authority.	× Board policies	<u>Y</u>	<u>No</u>	
G29	Governing board has adopted/updated policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	× Board policies	<u>Y</u>	<u>No</u>	Added to employee handbook in October 2020 and on the website (but located under heading Title IX, which may not be obvious to parents).
G30	Governing board has adopted/updated policies related to employee harassment.	× Board policies	<u>Y</u>	<u>No</u>	Added to employee handbook.
G31	Governing board has adopted and annually updates its safety plan by March 1 <sup>st</sup> to include all legal requirements applicable to charter schools.	× Board policies × Meeting agenda and minutes reflecting annual review and update	<u>Y</u>	<u>No</u>	Updates approved by board; also COVID plan.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G32	Governing board has adopted policies related to immunization records and administration of medication.	× Board policies	<u>Y</u>	<u>No</u>	Included in parent/student handbook. Could be helpful to include on school website with enrollment information.
G33	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	× Board policies	<u>Y</u>	<u>No</u>	In handbook
G34	Governing board has adopted policies related to Section 504/IDEA compliance.	× Board policies	<u>Y</u>	<u>No</u>	Posted on website and included in parent/student handbook.
<b>Education Code Assurances</b> [Note: As part of the review, the oversight team lead will evaluate whether such assurances are consistent with the charter school’s actual operations, based on available information. “Submitted” in this context means some information was available for review, although a full audit was not conducted.]					
G35	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	× Policy review • Executive director (or equivalent) interview × Review of any complaints	<u>Y</u>	<u>No</u>	No evidence of non-compliance
G36	Charter school has complied with assurance that it shall not charge tuition.	× Policy review • Executive director (or equivalent) interview	<u>Y</u>	<u>No</u>	No evidence of non-compliance; question about payments for field trips referred to financial oversight.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G37	Charter school has complied with assurance that it shall not discriminate against any pupil on the basis of the characteristics listed in Education Code section 220.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G38	Charter school has complied with assurance that it shall admit all students who reside in California who wish to attend (up to the Charter School’s capacity based upon space, staff, or Charter School policy).	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of student demographics and enrollment data</li> <li>× Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G39	Charter school has complied with assurance that it shall determine by public random drawing, which students, other than those already enrolled, will be allowed to enroll if the number of pupils who wish to attend charter school exceeds charter school’s capacity and make reasonable efforts to accommodate the growth of charter school.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G40	Charter school has complied with assurance that it shall comply with EC 47605(d)(2) in regard to the establishment of preferences for enrollment which shall not result in limiting enrollment access for pupils with: disabilities, academically low-achieving pupils, English Learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged or pupils based on nationality, race, ethnicity, or sexual orientation.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G41	Charter school has complied with assurance that it shall notify the school district of residence of the pupil’s last known address within 30 days if a pupil is expelled or leaves charter school without graduating or completing the school year for any reason	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>N</u>	<u>No</u>	Dehesa has received none; school states that it does send them and provided a sample.

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Memorandum of Understanding</u></b>					
G42	Board and charter school administration are aware of and familiar with the terms of any approved MOUs or agreements between the District and the charter school.	<ul style="list-style-type: none"> <li>× Memoranda of understanding</li> <li>× Review of agenda and minutes</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	
G43	Charter school has fulfilled its obligations under the MOU(s), including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>Low</u>	Compliant with MOU in governance-related areas except for posting of some board policies.
G44	Charter school responds promptly to authorizer inquiries.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.
G45	Charter school informs authorizer in advance of any proposed material changes to program or operations.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Complaint Policies and Procedures</u></b>					
G46	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom, as applicable, and website.	<ul style="list-style-type: none"> <li>× Board policies</li> <li>× Review of student/parent and staff handbooks</li> <li>• Observation of classrooms</li> <li>× Observation of website</li> </ul>	<u>Y</u>	<u>No</u>	Complaint forms on website could be easier to locate. On-site postings addressed in other portions of review.
G47	Complaint policies and procedures are available in the main/front office or website for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Observation of main office / website</li> </ul>	<u>Y</u>	<u>No</u>	On-site postings addressed in other portions of review.
G48	Complaints are handled in a manner that is consistent with the charter school’s policies and procedures, and there is no apparent bias or conflicts of interest.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Board President interview</li> <li>× School leader interview</li> </ul>	<u>Y</u>	<u>No</u>	No complaints referenced in board agendas.
G49	Charter school has policies that allow for student, parent, and staff complaints to be appealed to the charter school’s Board.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Review of website</li> <li>× Review of student/parent and staff handbooks</li> </ul>	<u>Y</u>	<u>No</u>	Conflict resolution process in parent/student handbook provides for appeal to board, but neither the UCP nor the Williams complaints include an explanation of process nor any mention of role of the board.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G50	Charter school has policies for student disciplinary actions that include appropriate due process.	<ul style="list-style-type: none"> <li>× Review of charter</li> <li>× Review of policies</li> <li>× Review of student/parent handbook</li> </ul>	<u>Y</u>	<u>No</u>	Policy track Education Code 48900 et seq. and includes appropriate due process.
G51	Charter school leadership discloses and ensures Board is fully informed of any anticipated or pending litigation.	<ul style="list-style-type: none"> <li>× Board President interview</li> <li>× School leader interview</li> <li>× Review of agendas</li> </ul>	<u>Y</u>	<u>No</u>	No anticipated or pending litigation included on board agendas; no evidence of failure to inform.
<b><u>Planning</u></b>					
G52	Board adopted a Learning Continuity Plan (2020-21 school year only) by September 30, 2020, which was submitted to the authorizer and San Diego County Office of Education.	<ul style="list-style-type: none"> <li>× Review of LCP</li> <li>× Authorizer records</li> </ul>	<u>Y</u>	<u>No</u>	LCP was adopted and submitted
G53	Board held a public hearing for review and comment for both the Learning Continuity Plan and budget overview for parents/guardians.	<ul style="list-style-type: none"> <li>× Sample agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	Public hearing held for LCP and budget overview (although board meeting could have been made more widely available to the public through use of Zoom link used by the board members).



# The Heights Charter: Finance/Business

## Context

The Heights Charter School projects an Average Daily Attendance (ADA) for FY 2020-2021 of 255.0 students. Per the 2<sup>nd</sup> Interim report from the school, the Ending Fund Balance for FY 2020-2021 is projected to be \$961,406 representing approximately 39.4% of total projected expenditures. Interviews and discussions were held with the Executive Director and the Coordinator, Office/ Business Services

## Compliance Area Concerns

- No concerns were noted for Compliance Areas reviewed
- No Audit Findings from prior year Audit Report as well as recently reviewed FY 2019-2020 Audit Report

## Best Practices

- The Heights Charter School has developed by design, its TK through 8<sup>th</sup> grade program with an eye on maintaining high quality education delivery through maintaining consistent enrollment from year to year. In doing so, the educational design provides for consistent, usually anticipated expenditures and revenues year to year. This control of enrollment growth in exchange for consistent, quality services translates into the school's stable financial performance and accurate projections/reporting.

Assigned District Staff Person: Diana Whyte, Debra Cramsie  
 Position of Assigned Staff Person: Executive Director, Board Secretary

**THE HEIGHTS CHARTER - FISCAL AND BUSINESS SYSTEMS OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Budget, Accounting, and Financial Reporting</u></b>					
<u>F1</u>	Governing board policies address budget, accounting, and financial reporting.	X Board policies	<u>Yes</u>	<u>No</u>	
<u>F2</u>	Current budget has been approved by the governing board.	X Current/adopted budget from 2 <sup>nd</sup> Interim Report X Board meeting minutes	<u>Yes</u>	<u>No</u>	
<u>F3</u>	Charter school has clear process for reviewing and revising the budget (e.g., in light of changes in student enrollment or operations), including governing board approval.	X Board meeting minutes. Board reviews for Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F4</u>	Charter school’s Learning Continuity Plan aligns with LCFE Calculator (applicable to 2020-21 school year only).	X Learning Continuity Plan X LCFE Calculator	<u>Yes</u>	<u>No</u>	
<u>F5</u>	Budget provides for all financial obligations.	X Current budget from 2 <sup>nd</sup> Interim Report, 1 <sup>st</sup> Interim and Adopted Budget reviews	<u>Yes</u>	<u>No</u>	
<u>F6</u>	Governing board approves all required financial reports.	X Required financial reports X Board meeting minutes	<u>Yes</u>	<u>No</u>	

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F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	X Financial records. Alt SACS reporting	<u>Yes</u>	<u>No</u>	
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	X Financial records and Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports	<u>Yes</u>	<u>No</u>	Evidence provided. Formal Cash Flow projections are presented minimally three times a year during the Adopted Budget and 1 <sup>st</sup> and 2 <sup>nd</sup> Interim reporting process
F13	Charter school’s business accounting system complies with state accounting and reporting requirements.	X Director of finance (or equivalent) interview. Alt SACS reporting	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Audit</u></b>					
<u>F14</u>	Charter school has selected a state-approved auditing firm, and annually submits independent auditor selection certification and contract to authorizer and county office of education by March 31st.	X Proof of submission of auditor certification and contract X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F15</u>	Charter school has developed auditing schedule/timeline.	X Auditing schedule/timeline	<u>Yes</u>	<u>No</u>	
<u>F16</u>	Charter school has submitted prior year’s financial audit to authorizer.	X Previous year’s audit X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F17</u>	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	Not Applicable. No Findings from Audit Report	<u>Yes</u>	<u>N/A</u>	N/A. No Audit Findings reported by auditor
<b><u>Financial Condition</u></b>					
<u>F18</u>	Charter school maintains an appropriate level of reserves for economic uncertainties.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reporting X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	School’s Ending Balance projection for FY 2020-21 per its 2 <sup>nd</sup> Interim Report forecasts an Ending Balance of \$961,406 on a yearly expenditure projection of \$2.4M. This represents a 39.4% Reserve projection at year end 2020-21

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F19	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Prepared formally three times a year during Adopted Budget and 1 <sup>st</sup> and 2 <sup>nd</sup> Interim reporting process. Assumptions reasonable and include all debt obligations.
F20	Based on the projections, charter school will be able to meet its financial obligations and maintain an appropriate level of reserves in the current and two subsequent fiscal years.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Evidence submitted via recent 2 <sup>nd</sup> Interim Report projects the school will maintain an appropriate level of reserves. Reserve levels for the current year and two future years respectively are: FY 2020-21 – 39.4%, FY 2021-22 – 34.7%, FY 2022-23 – 34.4%
<b><u>Cash Receipts</u></b>					
F21	Charter school has policies addressing cash receipts.	X Cash receipt policy	<u>Yes</u>	<u>No</u>	
F22	Charter school maintains records of all monies received (e.g., issues receipts).	X Cash receipt policy X Sample records of cash receipts X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F23	Charter school deposits monies in a timely manner.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F24	Charter school maintains records of deposits of all monies.	X Cash receipt policy X Sample records of cash deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F25	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F26	Charter school’s board has adopted a resolution or formally approved any interfund transfers via the due to/due from process, which details all material facts related to such transfers.	Not applicable. School has had not interfund transfers for current year as well as previous years	<u>Yes</u>	<u>NA</u>	Not Applicable. School has no interfund transfers to date for the current year.
<b><u>Disbursements</u></b>					
F27	Charter school has policies addressing disbursements.	X Disbursement policy	<u>Yes</u>	<u>No</u>	
F28	Disbursements require all of the following: (1) an original invoice from the vendor; (2) a receiving document; (3) appropriate approval of the purchase; and (4) ratification by the governing board, if amount exceeds maximum dollar amount set forth in charter school policy.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F29	Checks are signed by authorized employees.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F30	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F31	Charter school has segregated duties between purchasing, receiving, and accounts payable.	X Staff organizational chart X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Payroll</u></b>					
F32	Charter school has a salary schedule or other satisfactory salary structure.	X Salary schedule	<u>Yes</u>	<u>No</u>	
F33	Tax deposits are completed in a timely manner.	X Proof of tax deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F34	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	X Proof of recording of earnings X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	School staff and teachers do not participate in PERS and STRS
F35	Charter school has system to provide STRS data to authorizer.	X School does not provide STRS for EE’s X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	N/A
F36	Charter school has system to maintain employee earning records for preparation of W-2s.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F37	Charter school adheres to provisions of any leased teacher/staff agreement or MOU, including invoicing for every leased teacher/staff member and Board approval of same.	School does not participate in any leased teacher/staff agreements or MOU’s.	<u>No</u>	<u>N/A</u>	N/A. School does not have any Leased Teacher/Staff Agreement or MOUs in place.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Equipment Inventory</u></b>					
F38	Charter school has policies addressing the purchase and maintenance of equipment.	X Equipment purchase and maintenance policy	<u>Yes</u>	<u>No</u>	
F39	Charter school maintains an equipment inventory that is physically located on each site.	X Equipment inventory	<u>Yes</u>	<u>No</u>	
F40	Equipment purchased with federal funds is properly identified.	X Director of finance (or equivalent) interview. Alt SACS reporting	<u>Yes</u>	<u>No</u>	
<b><u>Student Attendance (All Schools)</u></b>					
F41	Charter school uses a generally approved attendance accounting system.	X Screenshot of attendance accounting system	<u>Yes</u>	<u>No</u>	Alternate SAC For utilized
F42	There is a designated staff person responsible for administering attendance.	X Staff organizational chart. Director of Finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F43	Charter school calendar includes a minimum of 175 instructional days.	X School calendar	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F44</u>	Charter school class/bell schedule ensures minimum instructional minutes (36,000 for K, 50,400 for 1st - 3rd, 5400 for 4th - 8th, 64,800 for 9th - 12th).	X Class/bell schedule (Binder 6, Tab 29)	<u>Yes</u>	<u>No</u>	
<u>F45</u>	Student absences are excluded from apportionment days.	X Attendance reports. Work samples X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F46</u>	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	X Attendance reports X Attendance clerk (or equivalent) interview. DCOT HR Lead	<u>Yes</u>	<u>No</u>	
<u>F47</u>	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	X Proof of submission	<u>Yes</u>	<u>No</u>	Evidence provided. “Hold Harmless” legislation implemented for FY 2020-21 due to COVID-19 Pandemic
<u>F48</u>	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F49</u>	Charter school has clear procedures for disenrolling students and providing notification to the student’s district of residence.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F50</u>	Charter school has clear procedures for claiming and reporting ADA to the state.	X Policies and procedures related to claiming and reporting ADA	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F51</u>	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F52</u>	Any changes in enrollment/ADA from school year to school year are reasonable and do not exceed threshold under Operations MOU that would trigger the need for a material revision to the charter.	X Teacher roster and monthly ADA reports as well as Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports	<u>Yes</u>	<u>No</u>	ADA enrollment projections reasonable and are consistently similar each year for the past several years
<b><u>Student Attendance (Schools Offering Independent Study)</u></b>					
<u>F53</u>	Charter school annually certifies independent study courses as being of the same rigor and educational quality as classroom-based courses, including information regarding instructional minutes, as required by Education Code section 51749.5(a)(4).	X Certification X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F54</u>	Teachers and students communicate in person, by phone, or by other live visual or audio connection at least twice per month, as required by Education Code section 51749.5(a)(7).	X Independent study coordinator (or equivalent) interview  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F55</u>	Charter school retains evidence of satisfactory educational progress for each independent study student, including a file of representative samples of each student’s work products (signed/initialed and dated by supervising teacher).	<ul style="list-style-type: none"> <li>X Sample grade books</li> <li>X Sample transcripts</li> <li>X Work samples</li> </ul>	<u>Yes</u>	<u>No</u>	
<u>F56</u>	Charter school does not offer courses required for high school graduation or UC or Cal State admission exclusively through independent study, as prohibited by Education Code section 51749.5(a)(13).	<ul style="list-style-type: none"> <li>X List of course offerings</li> </ul>	<u>Yes</u>	<u>No</u>	
<u>F57</u>	The program of each student in independent study is overseen by a certificated employee.	<ul style="list-style-type: none"> <li>X Student enrollment report</li> <li>X Staff organizational chart</li> <li>X Independent study teacher interview</li> </ul>	<u>Yes</u>	<u>No</u>	
<u>F58</u>	Charter school meets ratio of ADA to FTE certificated employees required by Education Code section 51745.6(d) (i.e., 25:1 or ratio in largest unified school district).	<ul style="list-style-type: none"> <li>X Student enrollment report. Ratio Calc</li> <li>X Staff organizational chart</li> <li>X Independent study coordinator (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
<u>F59</u>	Governing board has adopted and implemented written policy regarding the maximum length of time (by grade level and type of program) that may elapse between independent study assignment and completion.	<ul style="list-style-type: none"> <li>X Board policy</li> <li>X Independent study teacher interview</li> </ul>	<u>Yes</u>	<u>No</u>	

<u>No.</u>	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F60</u>	Governing board has adopted and implemented written policy regarding the number of missed assignments allowed before the school conducts an evaluation to determine whether student should remain in independent study.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F61</u>	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	X Sample agreements  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F62</u>	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F63</u>	Charter school does not provide any funds or other things of value to students who attend independent study programs (or their parents/guardians) that it does not provide to students who attend classroom-based programs (or their parents/guardians).	X Independent study coordinator (or equivalent) interview. Alt SACS reporting	<u>Yes</u>	<u>No</u>	
<u>F64</u>	Charter school claims ADA only for students who are residents of the county in which the apportionment claim is reported, or who are residents of a county immediately adjacent to the county in which the apportionment claim is reported.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F65</u>	Charter school maintains daily/hourly attendance credit register (separate from classroom attendance records) on a current basis as time values of student work products are evaluated by certificated teachers.	X Credit register, work samples X Independent study coordinator (or equivalent) interview X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F66</u>	Charter school claims apportionment credit for independent study only to the extent of the time value of student work products, as personally judged in each instance by a certificated teacher.	X Credit register, work samples X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F67</u>	Pursuant to Education Code section 47634.2, charter school has submitted a determination of funding form, and SBE subsequently issued a determination of funding.	X Request for determination of funding X SBE determination of funding	<u>Yes</u>	<u>No</u>	

815-21/4810246.1

# The Heights Charter: Personnel

## Context

Located in a strip mall at 2710 Alpine Blvd, Unit E, Alpine, CA 91901, The Heights Charter was established in 2012. It is a small, single resource center/independent study school serving approximately 260 students, grades K – 8 and located in Alpine, CA in San Diego County. The Coordinator of Office/Business Services is responsible for all Personnel processes at the charter site. There were three areas of Low-level concerns from the Oversight Checklist.

## Compliance Area Concerns

- Low level of Concern was related to #P13 which relates to Professional Development (PD) opportunities for teachers. Charter submitted two PD. Review requires three. It was noted that PD dates are coordinated with monthly staff meetings.
- Low level of Concern was related to #P15 which relates to teachers holding an EL authorization on their credential to serve these students. One teacher without EL authorization is completing the second part of the test process.

## Best Practices:

- Follow up and monitor low level concerns.

Assigned District Staff Person: Debra Cramsie  
 Position of Assigned Staff Person: Coordinator of Office/Business Services

**THE HEIGHTS CHARTER - PERSONNEL OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>All Employees</u></b>					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	X Employee handbook X Employee policies X Approved charter X Employment-related MOUs	<u>Yes</u>	<u>No</u>	MOU included employment with CTE credentials with SDCOE
P2	Charter school employee handbook and policies guarantee fair hiring practices.	X Employee handbook X Employee policies	<u>Yes</u>	<u>No</u>	
P3	Charter school enters employment contracts with all persons hired to work at school.	X Sample employment contracts	<u>Yes</u>	<u>No</u>	
P4	All employees have been fingerprinted, including Department of Justice background checks.	X Documentation of fingerprint clearance for all employees	<u>Yes</u>	<u>No</u>	31 Staff employees – FP clearances
P5	All employees have passed TB test and results are current.	X Documentation of current TB test results for all employees	<u>Yes</u>	<u>No</u>	31 Staff employees – TB test reported

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u> <u>Yes / No</u>	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	X Certificates of training	<u>Yes</u>	<u>No</u>	31 Staff employees - certificates
P7	If charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	X Certificates of training	<u>Yes</u>	<u>No</u>	31 Staff employees – completed training
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	X Observation of main office /website	<u>Yes</u>	<u>No</u>	19-20 observation on site review.  Debra sent photo for 20-21 review. Posted in main office area.
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	X Employee handbook	<u>Yes</u>	<u>No</u>	
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	X Employee handbook	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P11	Governing board approves personnel actions.	X Governing board minutes	<u>Yes</u>	<u>Low</u>	New hires in Directors report – No PA actions with Board. 2 board meetings submitted: 8/10/20 and 12/7/20
<b><u>Certificated Employees</u></b>					
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	X Staff organizational chart X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operation MOU approved 11/19/20. Discussion and review at 8/10/20 board meeting.
P13	Charter school provides teachers with professional development opportunities.	X Professional development calendar X Professional development session agenda X Teacher interviews	<u>Yes</u>	<u>Low</u>	PD dates are coordinated with monthly staff meetings. Submitted 2 PD sessions: COVID-19 and ZOOM meeting updates/process. Staff development trainings on socio-emotional concerns were held on Fridays from 4/16-5/21/21.
P14	Teachers providing instruction in core subject areas have the required credentials and certifications to meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of credentials and certifications held by core teachers X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	16 Core teachers  Operations MOU approved 11/19/20
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	X Staff organizational ) X Documentation of credentials and certifications held by teachers	<u>Yes</u>	<u>Low</u>	1 teacher - no EL - in process of completing EL test process. Passed 11/20/20 exam. (2 part test)

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P16	Teachers providing special education and related services have required credentials and certifications.	X Staff organizational chart X Documentation of credentials and certifications held by special education teachers	<u>Yes</u>	<u>No</u>	1 special education teacher
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	X Sample evaluations X Teacher interviews	<u>Yes</u>	<u>No</u>	Teacher interview completed 3/2/21
<b><u>Classified Employees</u></b>					
P18	Classified employees who provide instructional support in core subject areas, special education, and English language learning meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of qualifications held by classified aides X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 11/19/20

# The Heights Charter: Educational Program & Student Services

## Context

Located in a strip mall at 2710 Alpine Blvd, Unit E, Alpine, CA 91901, the Heights Charter was established in 2012. It is a small, single resource center/independent study school serving approximately 260 students, grades K – 8 and located in Alpine, CA in San Diego County. The Director is in charge of the Educational Program. Adjustments to the COVID-19 pandemic did reduce the number of students at the site but they continued to provide on-site learning to a reduced level than in previous years.

## Compliance Area Concerns

### 2020 Concerns

- The Heights Charter has successfully addressed all Educational Program and Special Education issues from the 2019-2020 oversight findings.

### E18 - Low

The first concern is a Low Level Concern related to #E18 which relates to the Charter school regularly collecting student achievement data and reporting it to parents. The Heights did provide copies of letters to parents which described student achievement in a narrative form.

### E19 - Low

The second concern is a Low Level Concern related to #E19 which relates to the Charter school providing required notifications of language proficiency assessments (ELPAC), including whether a child is a long-term English Learner or is at-risk of becoming one.

### E21 - Low

The third concern is a Low Level Concern related to #E21 which relates to the Charter school Learning Continuity Plan addressing student academic performance across all student populations. LCP currently includes vague descriptions of how ALL student populations will be supported which may be due to the fact the Charter school has a low number of students in SPED, ELL and other historically underachieving populations.

## Best Practices

- E18: Provide parents with MAP results and State testing results (or the results of the replacement testing).
- E19: Inform parents in a timely manner with the required notifications and testing results for EL students. If the Charter has no students who are ELLs or whose parents have exempted them from receiving ELD services, such documentation should be included in the annual oversight documentation.
- E21: Describe in detail how all subgroups that the Charter school serves will be supported for academic success in the LCP.
- E27: Charter school strives to reflect a similar demographic to the local or authorizing school district.

Assigned District Staff Person: Nicky Jones/Kim Koenig  
 Position of Assigned Staff Person: Asst. Director/ Director of Special Education

**THE HEIGHTS CHARTER - EDUCATIONAL PROGRAM AND STUDENT SERVICES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Educational Program - The Heights</u></b>					
E1	Charter school curricular and instructional plan complies with approved charter.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence	<u>Yes</u>	<u>No</u>	
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E3	Charter school staffing complies with approved charter.	X Approved charter X Staffing chart	<u>Yes</u>	<u>No</u>	
E4	Charter school staffing is sufficient to carry out educational program.	X Staffing chart • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E5	If applicable, parents of high school students are informed about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements.	• Student handbook	<u>Yes</u>	<u>N/A</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E6	Charter school has obtained WASC accreditation, if applicable.	<ul style="list-style-type: none"> <li>WASC accreditation</li> </ul>	<u>Yes</u>	<u>No</u>	
<b><u>Services to Special Populations</u></b>					
E7	Charter school follows process for identification and reclassification of students who are English Learners.	X Student handbook <ul style="list-style-type: none"> <li>Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
E8	If charter school graduates students, it has notified students in foster care, homeless students, and students of a military family or with migrant status of their rights of exemption from local graduation requirements.	<ul style="list-style-type: none"> <li>Student handbook</li> <li>Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
E9	Charter school policies and practices ensure referral and assessment of students suspected of needing accommodations under Section 504.	X Student handbook X Charter policies and procedures manual X CALPADS reports for Fall 1 submission <ul style="list-style-type: none"> <li>Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
E10	Students identified as eligible under Section 504 receive accommodations and supports required by their 504 plans.	X Sample 504 plans <ul style="list-style-type: none"> <li>Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Sample provided upon second request

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Curricular Materials</u></b>					
E11	Charter school uses standards-aligned instructional materials.	<ul style="list-style-type: none"> <li>X Description of courses, instructional framework, and/or scope and sequence</li> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	
E12	Charter school uses instructional materials that address the specific needs of English Learners.	<ul style="list-style-type: none"> <li>X Description of courses, instructional framework, and/or scope and sequence</li> <li>• Instructional leader (or equivalent) interview</li> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	Provided
E13	Charter school provides integrated English Language Development within regular classes in all content areas in a manner that is aligned with state content and ELD standards.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	Provided additional explanation on EL program
E14	Charter school provides designated English Language Development for a specific protected time during the school day that is aligned with ELD standards.	<ul style="list-style-type: none"> <li>X Class schedule</li> <li>• Instructional leader (or equivalent) interview</li> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	Provided additional information
<b><u>Assessment</u></b>					
E15	Charter school administers state-mandated testing according to testing rules and regulations as required for all K-12 schools in California.	<ul style="list-style-type: none"> <li>X Assessment calendar</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E16	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607.	X SBAC X Dashboard Data	<u>Yes</u>	<u>No</u>	
E17	Charter school has completed and timely posted a SARC containing required elements.	X SARC	<u>Yes</u>	<u>No</u>	information about the curriculum used is very vague. For each subject it states “The Heights Charter provides high quality instructional materials and core curricula for all students at all grade levels, including standards-aligned textbooks. Materials are updated and replaced as needed.”  Full curriculum scope and sequence provided
E18	Charter school regularly collects student achievement data and reports it to parents and staff.	X Sample data reports to parents X Sample data reports to staff • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>Low</u>	Parent reports submitted were mostly narrative or report cards. The one program they showed a sample for is xmath, a free online program that supports math fact fluency. it is not a state adopted curriculum
E19	Charter school provides required notifications of language proficiency assessments (ELPAC), including whether a child is a long-term English Learner or is at-risk of becoming one.	X Notifications/letters to parents X Home language surveys	<u>Yes</u>	<u>No</u>	Initial letter of notification -redacted) was provided. Only two students at the heights are ELLs. No summative assessments were given per California State guidelines for Spring 2020 due to COVID-19.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E20	Charter school has a Learning Continuity Plan (2020-21 school year only). LCP has been presented to, reviewed, and approved by the Charter school’s Board.	X LCP X Minutes from Board meeting	<u>Yes</u>	<u>No</u>	
E21	Learning Continuity Plan addresses student academic performance across all student populations.	X Review of LCP	<u>Yes</u>	<u>Low</u>	LCP included vague descriptions of how ALL student populations would be supported but the Heights has a low number of students in SPED, ELL and other historically underachieving populations
E22	Title I funds/categorical funding are being used to supplement the school’s LCP goals.	<ul style="list-style-type: none"> <li>• LCP</li> <li>• Director of finance (or equivalent) interview</li> </ul>	<u>No</u>	<u>N/A</u>	
E23	As applicable, the charter school has completed a School Plan for Student Achievement (SPSA) that meets federal school planning and stakeholder requirements for Title I for the 2020-21 school year.	<ul style="list-style-type: none"> <li>• SPSA</li> </ul>	<u>No</u>	<u>N/A</u>	N/A
E24	The charter school has complied with the programmatic requirements for the development and implementation of a schoolsite council (including composition, meetings, etc.) if it receives federal funding under Title I.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• Schoolsite council handbook</li> <li>• Membership lists</li> <li>• Meeting notices/agendas and minutes</li> </ul>	<u>No</u>	<u>N/A</u>	N/A



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Admissions</u></b>					
E25	Charter school complies with the admissions practices described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>No</u>	Has school ever had to use the lottery for enrollment? - no  If needed practice will be aligned to the process in the charter petition.
E26	Admissions process for a student with an IEP is the same as for a student without an IEP.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	
E27	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	X Charter school student data X Student data from nearby school districts	<u>Yes</u>	<u>Low</u>	Student data information reflects a majority white population (79% per SARC) as compared to 40% (Dehesa) and 60% (Alpine). SED for Alpine is 50%, Heights reports 12%.  This is being addressed through a recruitment plan submitted as a corrective action for 2020
E28	Charter school enrollment forms indicate compliance with all applicable laws, including prohibition on collecting information regarding immigration status; prohibition on collecting social security numbers unless required by law; and, as required by Education Code section 49452.9(a), health care coverage options and enrollment assistance information.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E29	If charter school has used lottery system to determine which students will be allowed to enroll, process was held in the manner described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>No</u>	process outline in charter petition. Not ever used
<b><u>Discipline</u></b>					
E30	Charter school discipline policies and practices are consistent with terms of charter.	X Approved charter X Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	
E31	Student discipline procedures comply with due process requirements set forth in Education Code section 47605, charter, and/or discipline policies and procedures, including all requirements for disciplining students with disabilities.	X Discipline policies and procedures, including policies regarding discipline of students with disabilities • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E32	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	X Discipline data X Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	No students have been suspended, expelled or released for low grades/GPA at the heights, per documentation provided.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Health and Safety</u></b>					
E33	Charter School has and annually updates its school safety plan, addressing fire emergencies, earthquakes, criminal incidents, accidents, injuries, and other threats to the health and safety of students and staff, consistent with Education Code requirements.	X School safety plan	<u>Yes</u>	<u>No</u>	
E34	Staff has been trained in health, safety, and emergency procedures, and appropriate first aid supplies are kept on hand.	X Training sign-in sheets • Observation of main office	<u>Yes</u>	<u>No</u>	only one CPR sign-in sheet provided.  Bloodborne pathogen documentation and sexual harassment training documentation provided Have requested documentation of additional required training.  Will recommend that Mandated reporter training docs be submitted yearly.
E35	Charter school has a policy/procedure for visitors to enter and leave campus.	X Policy or procedure	<u>Yes</u>	<u>No</u>	Provided
E36	Charter school provides for the screening of pupils’ vision, hearing, screening for scoliosis, and required immunizations.	X Records of student screenings	<u>Yes</u>	<u>No</u>	Provided per information in handbook

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E37	If charter school serves students in grades 7-12, governing board has adopted Suicide Prevention Policy that was created in conjunction with stakeholders, specifically lists its high-risk groups, addresses the needs of those high-risk students, and was updated in the last 5 years.	X Suicide Prevention Policy X Board meeting minutes	<u>Yes</u>	<u>No</u>	provided
E38	If charter school qualifies for FRPL for all meals that it provides, it has applied to provide a universal meal service to all students at the school, or, if not, has submitted a governing board resolution to the state claiming a fiscal hardship (with evidence that those finding are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> <li>• Application for universal meal service</li> <li>• Board resolution</li> </ul>	<u>Yes</u>	<u>N/A</u>	Handbook states that a meal is provided if a student qualifies for FRLP
E39	Charter school provides at least one meal per day to students who qualify for FRPL, except as provided for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Handbook states that a meal is provided if a student qualifies for FRLP
E40	Charter school posts on its website in a prominent, conspicuous location, the Title IX information, including the name and contact number/e-mail for the Title IX Coordinator for that school.	X Screenshot from website	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E41	If charter school serves students in grades 7-12, it provides comprehensive sexual health and HIV prevention education, as required by Education Code section 51930, et seq.	X Sexual health and HIV prevention education course description	<u>Yes</u>	<u>No</u>	
E42	Charter school has developed methods for informing parents/guardians of students in grades 6-12 regarding human trafficking prevention resources, as required by Education Code section 49381.	X Policy or other description of method for informing parents/guardians	<u>Yes</u>	<u>No</u>	They provided the updated handbook in the documentation materials that they sent but that is not the handbook available on their website. The Human Trafficking prevention resources are in handbook on the website
<b><u>Parent Notifications</u></b>					
E43	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	X Notice	<u>Yes</u>	<u>No</u>	
E44	If charter school serves students in 11th grade, parents of those students are notified by January 1st that the students will be deemed a Cal Grant applicant unless the student opts out, as required by Education Code section 69432.9(d)(1).	• Notice	<u>Yes</u>	<u>N/A</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E45	If charter school serves students in 12th grade, parents of those students are notified of student’s GPA by October 1st, as required by Education Code section 69432.9(c)(2).	<ul style="list-style-type: none"> <li>• Notice</li> </ul>	<u>Yes</u>	<u>N/A</u>	
E46	Charter school notifies parents at least twice a year regarding how to initiate access to available student mental health services on campus or in the community.	X Notice	<u>Yes</u>	<u>No</u>	Information in the Student Parent handbook
<b><u>Student Records</u></b>					
E47	Charter school maintains comprehensive records regarding its students.	X Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number	<u>Yes</u>	<u>No</u>	provided with a redacted list of student resident districts.  Not really a concern because of location and type of school.
E48	Charter school maintains student records, including special education records, in a confidential and secure location.	X Policy regarding confidentiality of student records <ul style="list-style-type: none"> <li>• Observation of main office</li> </ul>	<u>Yes</u>	<u>No</u>	
E49	Charter school has a policy or procedure for parents to review student files, including a log.	X Policy regarding review of records	<u>Yes</u>	<u>No</u>	In handbook
E50	Charter school has policy or procedure regarding release of student information.	X Policy regarding release of student information	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E51	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Verification provided

# The Heights Charter: Special Education

## Context

The Heights Charter School (THC) is authorized by the Dehesa School District and functions as a public school within the district for special education purposes. As a member of the East County Special Education Local Plan Area (SELPA), students have access to the full continuum of programs and services.

The Heights is a TK-8<sup>th</sup> grade independent study program that offers families the option of a 100% home school curriculum or receiving instruction in core subjects or electives from teachers on site at their resource center location. Families have the option to choose how many days per week they would like to attend. Specialized academic instruction (SAI) services are provided in both a push-in and pull-out model when they are onsite or virtually depending on the needs of the student. Both formal and informal assessment measures are utilized to measure and monitor student progress and assist in making data driven decisions related to instruction, goals and services. Related services, such as, speech and language therapy, occupational therapy, etc., are provided by an approved non-public agency (NPA). THC serves students of all levels, including those with moderate/severe disabilities, requiring more individualized supports.

The enrollment process for students with disabilities follows the same process as general education students, however, additional steps are put into place to ensure students receive the necessary supports per their IEP. Upon initial enrollment, the IEP is reviewed by the special education director to ensure appropriate services are provided. The team then reviews the IEP and student performance within the first 30 days (30-day interim) to make adjustments to the IEP or make recommendations as needed.

The THC Special Education Procedures Manual that is available online outlines a clear referral process for when the general education team or a family has concerns related to a student's academic performance. THC utilizes a student study team (SST) process in which the general education teacher works with parents and school site staff who are familiar with the student to put interventions into place. Intervention progress is monitored over a period of 6-8 weeks. Should the student require additional intervention, the SST refers to the THC special education team for assessment.

Students identified as eligible for special education services have access to the full range of services as indicated by their IEP. The sampling of IEP's submitted for review demonstrate that all required members of the IEP team were present and participated in the meeting. SELPA policies indicate clear timelines in accordance with the Individuals with IDEA and the California Department of Education (CDE). Service accountability is documented via an excel spreadsheet that is maintained by the special education director/education specialist.

According to data from November 2020, THC does not enroll a disproportionate number of students with disabilities compared to that of the state average. The identification rate of 13.67% for special education was determined using the CALPADS enrollment of 278 and SEIS counts of 38. This is consistent with the 2020 state average of 11.7%. Discipline data from 2018-2019 (most recent available due to Covid), data provided indicate that there were no suspensions for students with disabilities. There is no change to the CPA State Accountability data for 2019-2020. Due to COVID-19, all state assessments were suspended, and measures continue to be taken from 2018-2019 data.

At the time of this report, no MOU had been provided to the reviewer. The board agenda posted on the website from August 10, 2020 indicated that the special education MOU between THC and Dehesa was being reviewed by THC attorneys. The board agenda dated December 7, 2020 stated that the MOU was at an impasse related to attorney fees. The last agenda posted online for review is February 22, 2021, in which there is no mention as to the status of the MOU between THC and Dehesa.

## Compliance Area Concerns

- THC uses one staff person to fulfill the roles of special education director, school psychologist, and education specialist. She is also responsible for the special education CALPADS reporting. She does have the support of paraprofessionals and intervention teachers, however, this practice should be reevaluated to ensure that the requirements of each of the specific assignment can be fulfilled effectively and with fidelity.
- The above practice has resulted in the late submission of documents for the charter review process, as well as late or last-minute submissions of CALPADS data to the East County SELPA director.

## Best Practices

- Allocate an additional FTE or portion of an FTE to share or take on some of the additional responsibilities such as CALPADS.



Assigned District Staff Person: Kim Koenig  
 Position of Assigned Staff Person: Special Education Director

**THE HEIGHTS CHARTER - SPECIAL EDUCATION OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Special Education Program</u></b>					
S1	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> <li>• Student handbook</li> <li>X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission</li> <li>X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Charter procedural manual not provided, however, reviewer found on THC website.  Clear policies are outlined for enrollment. (30-day interim process)
S2	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services.	<ul style="list-style-type: none"> <li>• Student handbook</li> <li>X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission</li> <li>X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Charter procedural manual not provided, however, reviewer found on THC website.  Clear referral SST process
S3	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> <li>• Student handbook</li> <li>X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission</li> <li>X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Charter procedural manual not provided, however, reviewer found on THC website.  Timelines clearly outlined within procedure manual

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
S4	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	X Sample IEPs X Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
S5	All required members of IEP teams attend IEP meetings.	X Sample IEPs	<u>Yes</u>	<u>No</u>	
S6	Charter school does not enroll a disproportionately small number of students with disabilities.	X Data demonstrating percentage of students with disabilities in charter school	<u>Yes</u>	<u>No</u>	Data submitted 12/20- 13.65%, total enrollment 278, students eligible in SEIS 38
S7	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
S8	Board and charter school administration are aware of and familiar with the terms of the special education MOU between the District and the charter school.	<ul style="list-style-type: none"> <li>• Special Education MOU</li> <li>X Review of agenda and minutes</li> <li>• Board President interview</li> </ul>	<u>No</u>	<u>No</u>	
S9	Charter school has fulfilled its obligations under the MOU, including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>• Records of authorizer</li> </ul>	<u>Yes</u>	<u>No</u>	

# The Heights Charter: Facilities/Operations

## Context

Located in a strip mall at 2710 Alpine Blvd, Unit E, Alpine, CA 91901, The Heights Charter was established in 2012. It is a small, single resource center/independent study school serving approximately 260 students, grades K – 8 and located in Alpine, CA in San Diego County. The Director is in charge of maintenance. Being a leased commercial facility, the interviews and checklist items addressed only one low level concern. Adjustments to the COVID-19 pandemic did reduce the number of students at the site but they continued to provide on-site learning to a reduced level than previous years.

## Compliance Area Concerns

- The only concern is a Low Level Concern related to #O14 which relates to the Resource Center being outside of the geographic boundaries of the Authorizer, Dehesa School District. This will not be an issue until 2023 when The Heights needs to be reauthorized.

## Best Practices

- Follow up and monitor # O14 low level concern.

Assigned District Staff Persons: Noel Felkins and Diana Whyte

Position of Assigned Staff Persons: Coordinator Office/Financial Services and Executive Director

**THE HEIGHTS CHARTER - OPERATIONS AND FACILITIES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Maintenance of Facilities</u></b>					
O1	A designated person is responsible for overseeing operations and facilities management.	X Staff organizational chart	<u>Yes</u>	<u>No</u>	
O2	Facilities are adequate for number of students and types of programs.	X Capacity chart for campus facilities X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
O3	Charter school has process for routine inspections of grounds to ensure that they remain in good condition and free from mold and other hazardous substances.	X Inspection logs X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Legal Compliance</u></b>					
O4	All facilities meet Americans with Disabilities Act requirements.	<input type="checkbox"/> ADA certification	<u>No</u>	<u>No</u>	Developed in 2002, the property meets ADA compliance.
O5	All single-user restrooms have been designated as all-gender restrooms.	X Operations manager (or equivalent) interview	<u>No</u>	<u>No</u>	Observed

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O6	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan	<u>No</u>	N/A	Property was developed after asbestos was outlawed
O7	Charter school has certificate of occupancy on file.	<input type="checkbox"/> Certificate of occupancy	<u>No</u>	<u>No</u>	Do not have, but County Major Use Permit provides needed information
O8	Charter school has conditional use permit on file, as applicable.	<input type="checkbox"/> Conditional use permit	<u>No</u>	<u>No</u>	However, this is met by the <b>Major Use Permit</b> provided by San Diego County Planning Commission. It will expire 11/13/22 if agreements aren’t met.
O9	Charter school has safety inspection by local fire department on file.	X Safety inspection by local fire department	<u>Yes</u>	<u>No</u>	
O10	If charter school participates in an interscholastic athletic program, it has a written emergency action plan and at least one automated external defibrillator for the school.	X Emergency action plan X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	No interscholastic Athletics but they have 2 AEDs

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O11	If charter school serves any grades 6-12, and meets the 40% pupil poverty rate, it provides feminine hygiene products, including tampons and sanitary napkins, in a least 50% of the school’s restrooms.	X Operations manager (or equivalent) interview	<u>No</u>	<u>N/A</u>	School is below pupil poverty rate
O12	If charter school is aware of a lactating pupil, it has made accommodations for lactation other than a restroom and has provided a place to safely store milk.	X Operations manager (or equivalent) interview	<u>No</u>	<u>N/A</u>	No lactating pupils.
O13	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	X Certificates of insurance	<u>Yes</u>	<u>No</u>	
O14	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1, as recently amended by Assembly Bill 1507.	X Operations manager (or equivalent) interview <input type="checkbox"/> Designation of any charter facilities (e.g., resource centers, etc.) X Review of addresses of facilities	<u>Yes</u>	<u>Low</u>	Charter renewal not until 2023 when this will be addressed in reauthorization.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>  [Indicate <u>N/A</u> if applicable.]	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O15	Charter school has identified all facilities and their respective locations, including those that are available for use by students enrolled in the charter school for any purpose related to the charter school’s educational program (whether or not such facility(ies) is/are owned, leased, rented, or subleased by the charter school or a different entity).	<input checked="" type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	All are listed on Insurance Documents
O16	Charter school has not added or begun using any new or different facilities that are not identified in the most recent charter petition or material revision (as applicable) approved by the District’s governing board.	<input type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview <input type="checkbox"/> Authorizer records	<u>No</u>	<u>No</u>	Have none added.

# **Dehesa Charter Oversight Report**

## **Method School**



# Method School: Governance

## Context

Method Schools is a California public benefit corporation, founded in 2013. It has recently applied for federal 501(c)(3) tax exempt status from the IRS. It is governed by a 5-member board of directors and led by its founders as CEO and CBO of the school. The school has developed and sells educational technology under the name SmartFox. The school's CEO and CBO also identify themselves on social media as founders of SmartFox Education and EdHype.

## Compliance Area Concerns

Since the 2019-2020 charter review, the school has addressed several governance concerns and entered into an MOU with the district that clarifies several areas of mutual responsibility. One area of "high" concern noted in last year's review is still pending.

- Approval of 501(c)(3) status has not yet been received, although the application has been submitted and is now pending with the IRS.

The following "low" level concerns were noted:

- There is potential for conflicts of interest (or divided loyalties) arising from the commencement of sales of the SmartFox program and the dual roles of the CEO and CBO as leaders of the schools, SmartFox and EdHype. There may also be tax and accounting complications associated with the SmartFox business. The board and leadership plan to address this issue in 2021 now that sales of the program have begun. They will be assessing, with legal counsel, the advisability of separating the school from the educational technology business and possible structure for doing this.
- CBO job description provided is generic and does not capture the full range of responsibilities that the CBO covers in his reports to the board, or that are considered in the board's evaluation of the CBO.
- School continues to have difficulty engaging parents in governance and school decision-making. The school advisory committee described in the charter is not active.
- Board's current composition does not fully conform to the charter, which calls for a parent representative and community members who reside locally.
- Could not verify attendance at Brown Act training from documentation provided.
- One closed session was not correctly described or reported.
- Policy and handbook updates:
  - ◇ Parent/student handbook on website not updated; no board action on annual review/update of handbook.
  - ◇ Complaint policy undated; difficult to locate form on website and process not well-described.
  - ◇ No board approval of updated safety plan; plan in policy manual outdated.
  - ◇ No immunization or medications policies.
- Complaint policies and forms are unclear on the role of the board. Suspension/expulsion policy and handbook descriptions lack sufficient explanation of student due process rights. Also unclear if process for removal of students for "non-compliance" meets legal standard for due process.

## Best Practices

The following suggested changes in governance may support the school's further improvement:

- As the school matures, it could benefit from some new board membership with specific experience of the school and its challenges. This could be accomplished by expanding the board (amending the current bylaws) or retiring some current board members (4 of 5 have served since founding in 2013). The organization may also want to consider staggered terms as a way to mix continuity with fresh perspectives and more frequent meetings to ensure that board members are kept up-to-date on school issues. The board had planned to elect a new president, but that transition is not yet completed.
- A refresher on rules for conduct of board meetings might be helpful to the members to reinforce habits that ensure that time is used well and a clear record of action is made. At the meeting observed, the agenda was never adopted, agenda items were tabled without a vote, and a required vote was overlooked and taken later.
- The practice of repeating the same template for each board meeting can lead to confusion when all "categories" aren't used at every meeting. Similarly, recording minutes on the agenda document can also result in lack of clarity about what was actually said and done at the meeting. The school may wish to consider using separate templates for agendas and minutes and ensuring that both reflect just the specific meeting activity. Both agendas, document packets and minutes appear to be prepared and published without thorough oversight or editorial review.
- Although not specifically a part of the governance review, it was noted that the school has a very large fund balance. The CBO said that the board and leadership intends to develop a long-term plan for the school that will spend down the surplus. Development of this plan is a critical board function and assuring full engagement by the board will itself require some planning, to schedule additional meetings and possibly some extra training.

Assigned District Staff Person: Jessica Spallino; Mark Holley; & Steve Dorsey  
 Position of Assigned Staff Person: CEO; CBO; & Board President

**METHOD SCHOOL - GOVERNANCE OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Organizational Management</u></b>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<ul style="list-style-type: none"> <li>× Articles of Incorporation</li> <li>× Bylaws</li> </ul>	<u>Yes</u>	<u>High</u>	Bylaws are on school website, along with full policy manual. Charter has applied for but not yet received approval of 501(c)(3) status from the IRS. Because the school has not received substantial donations, the board is not concerned about potential consequences.
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<ul style="list-style-type: none"> <li>× Bylaws</li> </ul>	<u>Y</u>	<u>No</u>	Key bylaws components present.
G3	Any changes to charter or bylaws have been approved by charter school’s governing board and submitted to the authorizer.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Changes made were approved by the governing board and submitted to the authorizer as part of follow-up from prior year oversight report.
G4	Charter school has an organizational chart and job descriptions that delineate clear separation of duties and responsibilities.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Organizational chart</li> <li>× Job descriptions CEO/CBO</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	CBO job description updated and on file with HR.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G5	Governing board has a robust, outcomes-based process for evaluating the charter school leader.	<ul style="list-style-type: none"> <li>× Most recent charter school leader evaluation</li> <li>× Board president interview</li> </ul>	<u>N</u>	<u>No</u>	Insufficient information provided to judge whether evaluation (CEO and CBO) is outcomes-based or robust. A process for setting outcomes is in place, but the survey provided doesn’t address them specifically.
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> <li>× Executive director (or equivalent) interview</li> <li>• Teacher interview</li> <li>× Information available on charter school’s website</li> </ul>	<u>Y</u>	<u>Low</u>	No parent group is currently active.
<b><u>Composition</u></b>					
G7	Charter school has a list or roster of governing board members that is publicly accessible.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Information is available on charter school’s website</li> </ul>	<u>Y</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G8	Composition of governing board is consistent with approved charter.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>Low</u>	Current board is inconsistent with bylaws and charter. The charter states that parents and community will participate in governance through board and school advisory committee participation, with one seat reserved for parent of a current student. No current members are parents of Method students and one current board member resides out of state. Board intends to consider changes in composition of the board.
G9	Governing board is diverse and reflects charter school and community population.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Description of school and community demographics</li> </ul>	<u>Y</u>	<u>Low</u>	As noted above, the board does not reflect the community in the manner it committed to in its charter.
G10	Governing board members have relevant knowledge and experience in key areas, such as education, finance, legal, real estate, and fundraising.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Information posted on charter school’s website</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	Board members have relevant knowledge and experience, but at the board meeting observed, they did not all appear to be fully prepared or engaged in the issues before them.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Completed Form 700s</li> <li>× Completed Form 990s</li> <li>× Agendas and minutes</li> </ul>	<u>Y</u>	<u>Low</u>	No evidence of conflict of interest, but potential conflicts or divided loyalties are of concern. One board member is employed by a company that produces educational materials and the co-founders (CEO & CBO) identify as employees of SmartFox and EdHype. As outside sales of SmartFox increase, the board intends to address the possible need to separate the product from the school.
<b><u>Meetings</u></b>					
G12	Governing board conducts meetings as frequently as is needed to ensure that it addresses necessary charter school business, and such meetings are consistent with timelines set forth in charter and bylaws.	<ul style="list-style-type: none"> <li>× Annual governing board meeting calendar</li> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Board meets quarterly, although 2 meetings were held in September 2020, with both erroneously labeled as “regular” meetings.
G13	Governing board members receive annual training regarding Brown Act requirements.	<ul style="list-style-type: none"> <li>• Sign-in sheet from Brown Act training</li> <li>• Copy of materials (e.g., Power Point slides)</li> </ul>	<u>N</u>	<u>Low</u>	Webinar web page was insufficient documentation of training by all board members.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G14	Meetings are noticed and conducted in accordance with the Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of accessibility of meeting (location, online participation, public comment time, etc.)</li> <li>× Screenshot of charter school website</li> </ul>	<u>Y</u>	<u>No</u>	Reviewed year of agendas/minutes, although agendas are overwritten as minutes, so straight agendas are not saved. Agendas basically compliant, but school practice of repeating the same template for each board meeting resulted in items appearing on agenda that were not included in meeting (closed session seems to be always on the agenda, even when there isn’t one), and others misplaced on the agenda (unclear separation of action and reporting). Board packet for observed meeting had multiple errors of pagination and formatting, making some parts difficult to follow.
G15	Discussion during Board meetings is limited to properly-noticed items on agenda.	<ul style="list-style-type: none"> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	No non-agendized discussion at observed meeting; item added to agenda (without notice or vote) during meeting at March 2020 meeting.
G16	Board use of closed session during noticed meetings is consistent with Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>Low</u>	Closed session (without description of purpose) appears on all agendas, even when no closed session item is planned.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G17	Meeting agendas include sufficiently-detailed items of business to be transacted and any necessary action to be taken by the Board.	× Sample meeting agendas	<u>Y</u>	<u>No</u>	Agendas are sufficiently detailed.
G18	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	× Sample meeting agendas × Public comment policy	<u>Y</u>	<u>No</u>	Complete public comment notice on agenda.
G19	Board members solicit and provide and/or solicit input from the community served.	× Board biographies × Advisory committee/PTO documents × Board President interview	<u>Y</u>	<u>Low</u>	No evidence of effort to solicit input reflected in minutes or board observation. Parent Advisory Committee described in charter not in place; trying to use on-line parent workshops to develop, but does not currently appear to be oriented toward governance or decision-making.
G20	Minutes are approved and thereafter made available to the public.	× Sample meeting minutes × Screenshot of charter school website	<u>Y</u>	<u>No</u>	Minutes approved at subsequent regular meeting.

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G21	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	× Board meeting minutes	<u>Y</u>	<u>No</u>	Not applicable
<b><u>Board Policies</u> [Note: The oversight team lead may request additional policies for review that are not listed here.]</b>					
G22	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	× Parent handbook × Student handbook × Employee handbook	<u>N</u>	<u>Low</u>	Board approved updates to employee handbook, incorporating new policies; parent/student handbook on website is 2019-2020 and although relevant policies were updated, found no record of approval of updated parent/student handbook.
G23	Governing board has adopted policies related to conflict of interest, which align with the requirements of Education Code section 47604.1.	× Board policies	<u>Y</u>	<u>No</u>	Revised conflict of interest code adopted September 22, 2020, but not included in posted version of policy manual on school’s website. Subsequently provided.



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u> <u>High / Low /</u> <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G24	Governing board has adopted/updated policies related to student discipline and due process.	× Board policies	<u>Y</u>	<u>Low</u>	Policy adopted 2015; no updates noted in copy posted in policy manual. Website and handbook include a non-compliance policy that provides for ending student participation in the program without due process requirements provided in the event of expulsion.
G25	Governing board has adopted/updated policies related to complaints and investigations.	× Board policies	<u>Y</u>	<u>Low</u>	Complaint policy in place; no dates for adoption or updates. Difficult to locate complaint form within the policy (which is within the policy manual, which is within the board webpage). Nowhere else does website or in manual provide information on complaint procedures.
G26	Governing board has adopted/updated internal control policies (and related forms and systems).	× Board policies	<u>Y</u>	<u>No</u>	
G27	Governing board has adopted/updated policies related to bank signature authorizations.	× Board policies	<u>Y</u>	<u>No</u>	

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G28	Governing board has adopted/updated policies related to allowable purchases and purchasing authority.	× Board policies	<u>Y</u>	<u>No</u>	
G29	Governing board has adopted/updated policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	× Board policies	<u>Y</u>	<u>No /</u>	
G30	Governing board has adopted/updated policies related to employee harassment.	× Board policies	<u>Y</u>	<u>No</u>	
G31	Governing board has adopted and annually updates its safety plan by March 1 <sup>st</sup> to include all legal requirements applicable to charter schools.	× Board policies × Meeting agenda and minutes reflecting annual review and update	<u>Y</u>	<u>Low</u>	No safety plan update in board agendas/minutes in prior year. Safety plan in policy manual dates from January 2016.
G32	Governing board has adopted policies related to immunization records and administration of medication.	× Board policies	<u>Y</u>	<u>Low</u>	No immunization policy (though in parent/student handbook); no medications policy (and not in handbook).

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G33	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	× Board policies	<u>Y</u>	<u>No</u>	
G34	Governing board has adopted policies related to Section 504/IDEA compliance.	× Board policies	<u>Y</u>	<u>No</u>	Special education handbook adopted June 2020.
<b>Education Code Assurances</b> [Note: As part of the review, the oversight team lead will evaluate whether such assurances are consistent with the charter school’s actual operations, based on available information. “Submitted” in this context means some information was available for review, although a full audit was not conducted.]					
G35	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	× Policy review • Executive director (or equivalent) interview × Review of any complaints	<u>Y</u>	<u>No</u>	No evidence of non-compliance
G36	Charter school has complied with assurance that it shall not charge tuition.	× Policy review • Executive director (or equivalent) interview	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G37	Charter school has complied with assurance that it shall not discriminate against any pupil on the basis of the characteristics listed in Education Code section 220.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G38	Charter school has complied with assurance that it shall admit all students who reside in California who wish to attend (up to the Charter School’s capacity based upon space, staff, or Charter School policy).	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of student demographics and enrollment data</li> <li>• Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G39	Charter school has complied with assurance that it shall determine by public random drawing, which students, other than those already enrolled, will be allowed to enroll if the number of pupils who wish to attend charter school exceeds charter school’s capacity and make reasonable efforts to accommodate the growth of charter school.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G40	Charter school has complied with assurance that it shall comply with EC 47605(d)(2) in regard to the establishment of preferences for enrollment which shall not result in limiting enrollment access for pupils with: disabilities, academically low-achieving pupils, English Learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged or pupils based on nationality, race, ethnicity, or sexual orientation.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G41	Charter school has complied with assurance that it shall notify the school district of residence of the pupil’s last known address within 30 days if a pupil is expelled or leaves charter school without graduating or completing the school year for any reason	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>N</u>	<u>No</u>	Dehesa has received none; school states that it does send them and provided a sample.

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Memorandum of Understanding</u></b>					
G42	Board and charter school administration are aware of and familiar with the terms of any approved MOUs or agreements between the District and the charter school.	<ul style="list-style-type: none"> <li>× Memoranda of understanding</li> <li>× Review of agenda and minutes</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>Low</u>	Operational MOU signed by CEO in September 2020 but item does not appear on board agendas before or after signing.
G43	Charter school has fulfilled its obligations under the MOU(s), including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>Low</u>	Compliant with MOU in governance-related areas except for posting of some board policies and needed clarification of use of funds from SmartFox sales (MOU IV.F.).
G44	Charter school responds promptly to authorizer inquiries.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.
G45	Charter school informs authorizer in advance of any proposed material changes to program or operations.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Complaint Policies and Procedures</u></b>					
G46	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom, as applicable, and website.	<ul style="list-style-type: none"> <li>× Board policies</li> <li>× Review of student/parent and staff handbooks</li> <li>• Observation of classrooms</li> <li>× Observation of website</li> </ul>	<u>Y</u>	<u>No</u>	Complaint form not readily accessible on website; can be found in parent/student handbook. On-site postings addressed in other portions of review.
G47	Complaint policies and procedures are available in the main/front office or website for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Observation of main office / website</li> </ul>	<u>Y</u>	<u>No</u>	On-site postings addressed in other portions of review.
G48	Complaints are handled in a manner that is consistent with the charter school’s policies and procedures, and there is no apparent bias or conflicts of interest.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Board President interview</li> <li>× School leader interview</li> </ul>	<u>Y</u>	<u>No</u>	No complaints referenced in board agenda; no evidence to evaluate process.
G49	Charter school has policies that allow for student, parent, and staff complaints to be appealed to the charter school’s Board.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Review of website</li> <li>× Review of student/parent and staff handbooks</li> </ul>	<u>Y</u>	<u>Low</u>	Complaint policy includes no role for the board.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u> <u>High / Low /</u> <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G50	Charter school has policies for student disciplinary actions that include appropriate due process.	<ul style="list-style-type: none"> <li>× Review of charter</li> <li>× Review of policies</li> <li>× Review of student/parent handbook</li> </ul>	<u>Y</u>	<u>Low</u>	Although handbook says school adheres to Ed Code 48900 et seq., Suspension/Expulsion policy does not describe the full process and refers to parent/student handbook. Policy not updated since 2015. Due process in handbook describes neither the process nor infractions; includes removal from program for “non-compliance” without adequate due process.
G51	Charter school leadership discloses and ensures Board is fully informed of any anticipated or pending litigation.	<ul style="list-style-type: none"> <li>× Board President interview</li> <li>× School leader interview</li> <li>× Review of agendas</li> </ul>	<u>Y</u>	<u>No</u>	One closed session item was on the agenda for “potential litigation”; no evidence of failure to inform.
<b><u>Planning</u></b>					
G52	Board adopted a Learning Continuity Plan (2020-21 school year only) by September 30, 2020, which was submitted to the authorizer and San Diego County Office of Education.	<ul style="list-style-type: none"> <li>× Review of LCP</li> <li>× Authorizer records</li> </ul>	<u>Y</u>	<u>No</u>	LCP was adopted and submitted



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G53	Board held a public hearing for review and comment for both the Learning Continuity Plan and budget overview for parents/guardians.	× Sample agendas and minutes	<u>Y</u>	<u>No</u>	Public hearing held for LCP and budget overview, though no evidence of effort made to encourage participation.

815-21/4810420.1

## Method School: Finance/Business

### Context

Method Charter School currently projects enrollment funding for FY 2020-2021 of 624 students. Due to “Hold Harmless” legislation for the year, the school receives funding from the state based on its prior year’s ADA levels. Also, due to the COVID-19 pandemic, the state revised the P2 ADA cutoff date for FY 2019-2020 to February 29, 2020 which generated substantial unanticipated revenue for the school as it incurs higher enrollment during earlier months of the school year. The school benefitted tremendously from these legislative changes with an increase in total revenues of approximately \$2.56 million (2<sup>nd</sup> Interim Projected Revenues of \$6.94 M vs Adopted Budget Revenues of \$4.38M). Per the 2<sup>nd</sup> Interim report from the school, the Ending Fund Balance for FY 2020-2021 is projected to be \$10.1M representing 146% of total projected revenues. The operational balance for FY 2020-2021 projects a yearly Ending Balance of \$3.3M. Interviews and discussions were held with the Co-Founder of the school as well as the contracted business support group.

### Compliance Area Concerns

- Recent audit finding regarding attendance accounting resulting in an ADA over-reporting by 0.18 ADA. The error resulted in a net financial impact of \$1,813 for the school. The school’s auditor tested 101 days of reported attendance for Method Charter School and identified 20 days that did not have daily engagement logs. The school is not in compliance with Ed Code Section 19850.

### Best Practices

- For financial performance, the school reviews and analyzes its net margin % per student revenue received. Due to its agreement with SmartFox for use in direct instruction and curriculum, the school operates at an approximate 10% net margin. This operational strategy for curriculum allows the school to keep a financial “Rainy Day” fund and/or the ability to augment current educational delivery systems.
- Per the June 30, 2020 audit report, a corrective action plan indicates school management has implemented enhanced procedures to ensure daily attendance is tracked and regularly monitored in comparison to aggregate reported attendance. New actions include a revision of the Board-approved attendance policy in December 2020 and hiring a skilled independent study school registrar, also in December 2020. Management has implemented increased teacher training and development of new reports and workflow processes. Per the school’s revised December 2020 Attendance Policy related to its Work Sample Policy the school in the future will: 1) Collect a minimum of one (1) work sample per course with correct name, date, and course title per LP, for every student. 2) Collect a learning journal signed by parent and/or designated learning coach per month/learning period.

Assigned District Staff Person: Mark Holley, Corey Cavanah)  
 Position of Assigned Staff Person: Co-Founder and CBO, President, Creative Back Office

**METHOD SCHOOL - FISCAL AND BUSINESS SYSTEMS OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Budget, Accounting, and Financial Reporting</u></b>					
F1	Governing board policies address budget, accounting, and financial reporting.	X Board policies	<u>Yes</u>	<u>No</u>	
F2	Current budget has been approved by the governing board.	X Current/adopted budget X Board meeting minutes	<u>Yes</u>	<u>No</u>	
F3	Charter school has clear process for reviewing and revising the budget (e.g., in light of changes in student enrollment or operations), including governing board approval.	X Board meeting minutes X Director of finance (or equivalent) interview. Formal Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reporting process	<u>Yes</u>	<u>No</u>	
F4	Charter school’s Learning Continuity Plan aligns with LCFE Calculator (applicable to 2020-21 school year only).	X Learning Continuity Plan X LCFE Calculator	<u>Yes</u>	<u>No</u>	
F5	Budget provides for all financial obligations.	X Current budget	<u>Yes</u>	<u>No</u>	
F6	Governing board approves all required financial reports.	X Required financial reports X Board meeting minutes	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	X Financial records	<u>Yes</u>	<u>No</u>	
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	X Financial records, Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim reporting	<u>Yes</u>	<u>No</u>	
F13	Charter school’s business accounting system complies with state accounting and reporting requirements.	X Director of finance (or equivalent) interview, Alt SACS reporting	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Audit</u></b>					
<u>F14</u>	Charter school has selected a state-approved auditing firm, and annually submits independent auditor selection certification and contract to authorizer and county office of education by March 31st.	X Proof of submission of auditor certification and contract X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F15</u>	Charter school has developed auditing schedule/timeline.	X Auditing schedule/timeline	<u>Yes</u>	<u>No</u>	
<u>F16</u>	Charter school has submitted prior year’s financial audit to authorizer.	X Previous year’s audit X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F17</u>	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	X Corrective plan of action noted from school in response to audit finding of an overstatement of 0.18 ADA, or an impact of \$1,813 to the school. See comments.  X Director of finance (or equivalent) interview . Review of recent Audit Report	<u>Yes</u>	No	Recent audit finding regarding attendance accounting resulting in an ADA over-reporting by 0.18 ADA. The error resulted in a net financial impact of \$1,813 for the school. The school’s auditor tested 101 days of reported attendance for Method Charter School and identified 20 days that did not have daily engagement logs. The School’s corrective action plan indicates school management has implemented enhanced procedures to ensure daily attendance is tracked and regularly monitored in comparison to aggregate reported attendance. New actions include a revision of the Board-approved attendance policy in December 2020 and hiring a skilled

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
					independent study school registrar, also in December 2020. Management has implemented increased teacher training and development of new reports and workflow processes. Per the school’s revised December 2020 Attendance Policy related to its Work Sample Policy the school in the future will: 1) Collect a minimum of one (1) work sample per course with correct name, date, and course title per LP, for every student. 2) Collect a learning journal signed by parent and/or designated learning coach per month/learning period.
<b><u>Financial Condition</u></b>					
F18	Charter school maintains an appropriate level of reserves for economic uncertainties.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports and MYP Projections X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	The school benefitted tremendously from “Hold Harmless” COVID-19 legislative changes with an increase in total revenues of approximately \$2.56 million (2 <sup>nd</sup> Interim Projected Revenues of \$6.94 M vs Adopted Budget Revenues of \$4.38M). Per the 2 <sup>nd</sup> Interim report from the school, the Ending Fund Balance for FY 2020-21 is projected to be \$10.1M representing 146% of total projected revenues. The operational balance for FY 2020-21 projects a yearly Ending Balance of \$3.3M.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F19	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	X Financial records. MYP Projections  X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Evidence provided reasonable and realistic. School fiscal projections for the current fiscal year and two future years indicate a healthy Ending Balance in each of the three year’s mentioned. FY 2022-23 Ending Balance projected at: \$16.422M Ending Balance vs Yearly Revenues of \$7.057M, or a projected 232.70% Reserve
F20	Based on the projections, charter school will be able to meet its financial obligations and maintain an appropriate level of reserves in the current and two subsequent fiscal years.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports and MYP Projections  X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Cash Receipts</u></b>					
F21	Charter school has policies addressing cash receipts.	X Cash receipt policy	<u>Yes</u>	<u>No</u>	
F22	Charter school maintains records of all monies received (e.g., issues receipts).	X Cash receipt policy X Sample records of cash receipts X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F23	Charter school deposits monies in a timely manner.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F24</u>	Charter school maintains records of deposits of all monies.	X Cash receipt policy X Sample records of cash deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F25</u>	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F26</u>	Charter school’s board has adopted a resolution or formally approved any interfund transfers via the due to/due from process, which details all material facts related to such transfers.	X N/A. No interfund transfers via the due to/from process occurred	<u>Yes</u>	<u>N/A</u>	Not applicable
<b><u>Disbursements</u></b>					
<u>F27</u>	Charter school has policies addressing disbursements.	X Disbursement policy	<u>Yes</u>	<u>No</u>	
<u>F28</u>	Disbursements require all of the following: (1) an original invoice from the vendor; (2) a receiving document; (3) appropriate approval of the purchase; and (4) ratification by the governing board, if amount exceeds maximum dollar amount set forth in charter school policy.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F29</u>	Checks are signed by authorized employees.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F30</u>	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F31</u>	Charter school has segregated duties between purchasing, receiving, and accounts payable.	X Staff organizational chart X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Payroll</u></b>					
<u>F32</u>	Charter school has a salary schedule or other satisfactory salary structure.	X Salary schedule (Binder 6, Tab 21)	<u>Yes</u>	<u>No</u>	
<u>F33</u>	Tax deposits are completed in a timely manner.	X Proof of tax deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F34</u>	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	X Proof of recording of earnings. School EE’s do not participate in Pers/STRS X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Evidence provided for Social Security. Teachers and staff of the school do not participate in PERS and STRS
<u>F35</u>	Charter school has system to provide STRS data to authorizer.	X Does not participate in STRS X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	N/A
<u>F36</u>	Charter school has system to maintain employee earning records for preparation of W-2s.	X Director of finance (or equivalent) interview, reports	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F37</u>	Charter school adheres to provisions of any leased teacher/staff agreement or MOU, including invoicing for every leased teacher/staff member and Board approval of same.	X Not applicable. School does not participate in any leased teacher/staff agreements	Yes	No	Not applicable. School does not participate in any leased teacher/staff agreements or MOU’s
<b><u>Equipment Inventory</u></b>					
<u>F38</u>	Charter school has policies addressing the purchase and maintenance of equipment.	X Equipment purchase and maintenance policy	<u>Yes</u>	<u>No</u>	
<u>F39</u>	Charter school maintains an equipment inventory that is physically located on each site.	X Equipment inventory	<u>Yes</u>	<u>No</u>	
<u>F40</u>	Equipment purchased with federal funds is properly identified.	X Director of finance (or equivalent) interview. Fiscal reports utilizing Alt SACS format	<u>Yes</u>	<u>No</u>	
<b><u>Student Attendance (All Schools)</u></b>					
<u>F41</u>	Charter school uses a generally approved attendance accounting system.	X Screenshot of attendance accounting system	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F42	There is a designated staff person responsible for administering attendance.	X Staff organizational chart. Director of Finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	School recently hired in December 2020 an Independent Study Registrar for administering attendance. Previously, the administering of attendance was a shared responsible between CFO and Office Staff
F43	Charter school calendar includes a minimum of 175 instructional days.	X School calendar	<u>Yes</u>	<u>No</u>	
F44	Charter school class/bell schedule ensures minimum instructional minutes (36,000 for K, 50,400 for 1st - 3rd, 5400 for 4th - 8th, 64,800 for 9th - 12th).	X Class/bell schedule (Binder 6, Tab 29)	<u>Yes</u>	<u>No</u>	Not really applicable for on-line learning programs
F45	Student absences are excluded from apportionment days.	X Attendance reports X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F46	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	X Attendance reports X Attendance clerk (or equivalent) interview, DCOT Personnel Lead	<u>Yes</u>	<u>No</u>	
F47	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	X Proof of submission	<u>Yes</u>	<u>No</u>	Evidence provided. School funded on Prior Year Attendance levels due to “Hold Harmless” legislation in response to COVID-19 Pandemic

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F48</u>	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F49</u>	Charter school has clear procedures for disenrolling students and providing notification to the student’s district of residence.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F50</u>	Charter school has clear procedures for claiming and reporting ADA to the state.	X Policies and procedures related to claiming and reporting ADA. Submittal of required state reports	<u>Yes</u>	<u>No</u>	Evidence provided. However, FY 2019-20 Audit Report a claiming error in ADA reporting. See notes regarding Audit Report Findings, #F17
<u>F51</u>	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F52</u>	Any changes in enrollment/ADA from school year to school year are reasonable and do not exceed threshold under Operations MOU that would trigger the need for a material revision to the charter.	X Teacher roster and monthly ADA reports. Prior Year ADA levels per “Hold Harmless” legislation	<u>Yes</u>	No	Evidence provided enrollment projections reasonable. The school benefitted tremendously the past two years of “Hold Harmless” COVID-19 Legislation related to ADA reporting.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b>Student Attendance (Schools Offering Independent Study)</b>					
F53	Charter school annually certifies independent study courses as being of the same rigor and educational quality as classroom-based courses, including information regarding instructional minutes, as required by Education Code section 51749.5(a)(4).	X Certification X Independent study teacher interview	<u>Yes</u>	<u>No</u>	Evidence provided
F54	Teachers and students communicate in person, by phone, or by other live visual or audio connection at least twice per month, as required by Education Code section 51749.5(a)(7).	X Independent study coordinator (or equivalent) interview  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
F55	Charter school retains evidence of satisfactory educational progress for each independent study student, including a file of representative samples of each student’s work products (signed/initialed and dated by supervising teacher).	X Sample grade books X Sample transcripts X Work samples	<u>Yes</u>	<u>No</u>	
F56	Charter school does not offer courses required for high school graduation or UC or Cal State admission exclusively through independent study, as prohibited by Education Code section 51749.5(a)(13).	X List of course offerings	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F57	The program of each student in independent study is overseen by a certificated employee.	X Student enrollment report X Staff organizational chart X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
F58	Charter school meets ratio of ADA to FTE certificated employees required by Education Code section 51745.6(d) (i.e., 25:1 or ratio in largest unified school district).	X Student enrollment report, ratio calc summary X Staff organizational chart X Independent study coordinator (or equivalent) interview X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
F59	Governing board has adopted and implemented written policy regarding the maximum length of time (by grade level and type of program) that may elapse between independent study assignment and completion.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
F60	Governing board has adopted and implemented written policy regarding the number of missed assignments allowed before the school conducts an evaluation to determine whether student should remain in independent study.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
F61	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	X Sample agreements  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F62	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F63	Charter school does not provide any funds or other things of value to students who attend independent study programs (or their parents/guardians) that it does not provide to students who attend classroom-based programs (or their parents/guardians).	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F64	Charter school claims ADA only for students who are residents of the county in which the apportionment claim is reported, or who are residents of a county immediately adjacent to the county in which the apportionment claim is reported.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F65	Charter school maintains daily/hourly attendance credit register (separate from classroom attendance records) on a current basis as time values of student work products are evaluated by certificated teachers.	X Credit register X Independent study coordinator (or equivalent) interview X Student work samples X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
F66	Charter school claims apportionment credit for independent study only to the extent of the time value of student work products, as personally judged in each instance by a certificated teacher.	X Credit register , student work samples X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F67</u>	Pursuant to Education Code section 47634.2, charter school has submitted a determination of funding form, and SBE subsequently issued a determination of funding.	<input checked="" type="checkbox"/> Request for determination of funding <input checked="" type="checkbox"/> SBE determination of funding	<u>Yes</u>	<u>No</u>	

815-21/4810246.1



## Method School: Personnel

### Context

The Director of HR and Compliance is responsible for all Personnel processes at the charter site. There are four areas of Low-level concerns from the Personnel Oversight Checklist.

### Compliance Area Concerns

- First Low level of Concern was related to #P5 which relates to ALL employees passing a TB test. Six employees have not completed this process for 20-21. It was explained by the charter director and health care specialists that due to COVID-19 vaccines these six employees were not able to complete the TB test.
- Second Low level of Concern was related to #P6 which relates to AB1432 Child Abuse Neglect and Reporting training. One employee has not completed this training for 20-21
- Third Low level of Concern was related to #P7 which relates to supervisors completing Anti-harassment training. Two employees have not completed this training for 20-21

### Best Practices

- Follow up and monitor all four low level concerns.

Assigned District Staff Person: Tracy Robertson  
 Position of Assigned Staff Person: Director of HR and Compliance

**METHOD SCHOOL - PERSONNEL OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>All Employees</u></b>					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	X Employee handbook X Employee policies X Approved charter N/A Employment-related MOUs	<u>Yes</u>	<u>No</u>	
P2	Charter school employee handbook and policies guarantee fair hiring practices.	X Employee handbook X Employee policies	<u>Yes</u>	<u>No</u>	
P3	Charter school enters employment contracts with all persons hired to work at school.	X Sample employment contracts	<u>Yes</u>	<u>No</u>	
P4	All employees have been fingerprinted, including Department of Justice background checks.	X Documentation of fingerprint clearance for all employees	<u>Yes</u>	<u>No</u>	
P5	All employees have passed TB test and results are current.	X Documentation of current TB test results for all employees	<u>Yes</u>	<u>Low</u>	1 employee with pending TB testing results

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u> <u>Yes / No</u>	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	X Certificates of training	<u>Yes</u>	<u>No</u>	
P7	If charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	X Certificates of training	<u>Yes</u>	<u>Low</u>	2 employees not completed training
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	X Observation of main office /website	<u>Yes</u>	<u>No</u>	19-20 observation on site review.  Picture of DFEH poster emailed from HR
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	X Employee handbook	<u>Yes</u>	<u>No</u>	
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	X Employee handbook	<u>Yes</u>	<u>No</u>	PTO time = Vacation, Sick Leave and Personal time off
P11	Governing board approves personnel actions.	X Governing board minutes	<u>Yes</u>	<u>Low</u>	Bylaws page 14 – Director has responsibility of selection, hiring and evaluations of staff of the corporation with adopted charter budget.

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Certificated Employees</u></b>					
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	X Staff organizational chart X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operation MOU approved 9/16/20
P13	Charter school provides teachers with professional development opportunities.	X Professional development calendar X Professional development session agenda X Teacher interviews	<u>Yes</u>	<u>No</u>	Teacher interview 2/22/21
P14	Teachers providing instruction in core subject areas have the required credentials and certifications to meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of credentials and certifications held by core teachers X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 9/16/20
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	X Staff organizational chart X Documentation of credentials and certifications held by teachers	<u>Yes</u>	<u>No</u>	
P16	Teachers providing special education and related services have required credentials and certifications.	X Staff organizational chart X Documentation of credentials and certifications held by special education teachers	<u>Yes</u>	<u>No</u>	1 special education teacher

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	<input checked="" type="checkbox"/> Sample evaluations <input checked="" type="checkbox"/> Teacher interviews	<u>Yes</u>	<u>No</u>	Teacher interview completed 2/22/21
<b><u>Classified Employees</u></b>					
P18	Classified employees who provide instructional support in core subject areas, special education, and English language learning meet state and federal requirements, terms of approved charter, and any MOUs.	<input checked="" type="checkbox"/> Staff organizational chart <input type="checkbox"/> N/A Documentation of qualifications held by classified aides <input checked="" type="checkbox"/> Approved charter <input checked="" type="checkbox"/> Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 9/16/20  Note: Do not hire classified aides. Documentation N/A

# Method School: Educational Program & Student Services

## Context

Located in Murrieta, CA, Method is a tuition-free, independent study, public charter school serving students in Grades TK-12 in San Diego County and adjacent counties.

## Compliance Area Concerns

### 2020 Concerns

- 14. Special Education: Method's NPA contractor for speech and language is not listed as a certified NPA provider. Method provided a letter stating that they were working with ECSELPA to ensure that NPA contractors are certified and compliant.
- 15. Special Education: Data reflects disproportionality of English Learner and socioeconomically disadvantaged subgroup populations enrolled in Method, as compared to Dehesa School District. While Method has not submitted a plan they did respond to the concern stating; " Method enrolls a diverse enrollment base that closely mirrors the service area in which we operate. We make efforts to replicate the Dehesa population, per ed code. In order to do better for ELL students, we've focused on hiring more Latinx and other bilingual staff. Having a diverse teacher population is the most direct path to a diverse student population.
- 17. Special Education: Given that one-on-one special education services are provided to students in a community room setting, there is a need to ensure appropriate supervision (e.g., the presence of a parent or adult in the room). Evidence was submitted in Oct 202 certifying that staff have been informed of this mandate.

### E6 - Low

The first concern is a Low Level Concern related to #E6 which relates to the Charter school following the process for identification and reclassification of students who are English Learners.

### E16 - Low

The second concern is a Low Level Concern related to #E16 which relates to the Charter school meeting renewal requirements as set forth in EC 47607 for both SBAC and Dashboard Data. This has been addressed in the plan for corrective action.

### E40 - Low

The third concern is a Low Level Concern related to #E40 which relates to the Charter school posting on its website in a prominent, conspicuous location, the Title IX information, including the name and contact number/e-mail for the Title IX Coordinator for that school.

## Best Practices

- E6 - For the HLS survey, include the required 4 questions for initial placement per EC/ESSA.
- E16 - Continue to implement measures to ensure academic progress and adequate participation in state testing per petition renewal requirements
- E25 - Continue to implement the plan to increase student diversity and to meet residency requirements for enrollees.
- E40 - Post the Title IX compliance documentation to website

Assigned District Staff Person: Jade Fernandez  
 Position of Assigned Staff Person: Head of Schools

**METHOD SCHOOL - EDUCATIONAL PROGRAM AND STUDENT SERVICES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Educational Program - Method</u></b>					
E1	Charter school curricular and instructional plan complies with approved charter.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence	<u>Yes</u>	<u>No</u>	Curriculum is recognized by NCAA and UC. School states that it is aligned to CCSS.
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Curriculum appears to offer base curriculum as well as tiered resources for support additional info regarding ELLs-received
E3	Charter school staffing complies with approved charter.	X Approved charter X Staffing chart	<u>Yes</u>	<u>No</u>	
E4	Charter school staffing is sufficient to carry out educational program.	X Staffing chart • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Appears sufficient from staffing chart
E5	If applicable, parents of high school students are informed about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements.	X Student handbook	<u>Yes</u>	<u>No</u>	website still shows 2019-20 handbook-transferability not mentioned but college readiness is discussed. School is WASC approved. Transferability is item E page 30 of petition  parent notification-received

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E6	Charter school has obtained WASC accreditation, if applicable.	X WASC accreditation	<u>Yes</u>	<u>No</u>	Accreditation dates not provided - just a screenshot from WASC website. Petition states acc thru 2024
<b><u>Services to Special Populations</u></b>					
E7	Charter school follows process for identification and reclassification of students who are English Learners.	X Student handbook • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E8	If charter school graduates students, it has notified students in foster care, homeless students, and students of a military family or with migrant status of their rights of exemption from local graduation requirements.	X Student handbook • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E9	Charter school policies and practices ensure referral and assessment of students suspected of needing accommodations under Section 504.	X Student handbook X Charter policies and procedures manual X CALPADS reports for Fall 1 submission • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E10	Students identified as eligible under Section 504 receive accommodations and supports required by their 504 plans.	X Sample 504 plans • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	requested-received



No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Curricular Materials</u></b>					
E11	Charter school uses standards-aligned instructional materials.	X Description of courses, instructional framework, and/or scope and sequence • Classroom observations	<u>Yes</u>	<u>No</u>	petition and website both state the curriculum is standards aligned
E12	Charter school uses instructional materials that address the specific needs of English Learners.	X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview • Classroom observations	<u>Yes</u>	<u>No</u>	requested information-received  Policy makes statements about the school providing appropriate “support” to ELLs and the expectation that ELLs advance at least one level per year. Uses i-Ready
E13	Charter school provides integrated English Language Development within regular classes in all content areas in a manner that is aligned with state content and ELD standards.	• Instructional leader (or equivalent) interview • Classroom observations	<u>Yes</u>	<u>No</u>	requested information-received  Policy makes statements about the school providing appropriate “support” to ELLs and the expectation that ELLs advance at least one level per year. Designated inst a component of i-Ready
E14	Charter school provides designated English Language Development for a specific protected time during the school day that is aligned with ELD standards.	X Class schedule • Instructional leader (or equivalent) interview • Classroom observations	Yes	<u>N/A</u>	requested information-received  Difficult to track this in a virtual homeschool learning environment

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Assessment</u></b>					
E15	Charter school administers state-mandated testing according to testing rules and regulations as required for all K-12 schools in California.	<input checked="" type="checkbox"/> Assessment calendar <ul style="list-style-type: none"> <li>• <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
E16	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607.	<input checked="" type="checkbox"/> SBAC <input checked="" type="checkbox"/> Dashboard Data	<u>Yes</u>	<u>Low</u>	testing percentages are below the state required percent  CTE percentages very low  Dropout and graduation rates very low
E17	Charter school has completed and timely posted a SARC containing required elements.	<input checked="" type="checkbox"/> SARC	<u>Yes</u>	<u>No</u>	
E18	Charter school regularly collects student achievement data and reports it to parents and staff.	<input checked="" type="checkbox"/> Sample data reports to parents <input checked="" type="checkbox"/> Sample data reports to staff <ul style="list-style-type: none"> <li>• <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
E19	Charter school provides required notifications of language proficiency assessments (ELPAC), including whether a child is a long-term English Learner or is at-risk of becoming one.	<input checked="" type="checkbox"/> Notifications/letters to parents <input checked="" type="checkbox"/> Home language surveys	<u>Yes</u>	<u>No</u>	HLS does NOT ask “Which language did your child learn when they first began to talk?”  Parent reports have been requested-received

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E20	Charter school has a Learning Continuity Plan (2020-21 school year only). LCP has been presented to, reviewed, and approved by the Charter school’s Board.	X LCP X Minutes from Board meeting	<u>Yes</u>	<u>No</u>	LCP listed on website but link does not work
E21	Learning Continuity Plan addresses student academic performance across all student populations.	X Review of LCP	<u>Yes</u>	<u>No</u>	minutes when LCP was approved-received
E22	Title I funds/categorical funding are being used to supplement the school’s LCP goals.	<ul style="list-style-type: none"> <li>• LCP</li> <li>• Director of finance (or equivalent) interview</li> </ul>	<u>No</u>	<u>N/A</u>	No Title 1
E23	As applicable, the charter school has completed a School Plan for Student Achievement (SPSA) that meets federal school planning and stakeholder requirements for Title I for the 2020-21 school year.	<ul style="list-style-type: none"> <li>• SPSA</li> </ul>	<u>No</u>	<u>N/A</u>	N/A
E24	The charter school has complied with the programmatic requirements for the development and implementation of a school site council (including composition, meetings, etc.) if it receives federal funding under Title I.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• School site council handbook</li> <li>• Membership lists</li> <li>• Meeting notices/agendas and minutes</li> </ul>	<u>No</u>	<u>N/A</u>	N/A

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Admissions</u></b>					
E25	Charter school complies with the admissions practices described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>No</u>	Method Schools aligns its Kindergarten age requirement with that of California Education Code. (Kindergarten in California - Elementary (CA Dept of Education).  Additionally, based on research and current CDE information, enrollment is compliant with current Ed Codes based on county reqs.
E26	Admissions process for a student with an IEP is the same as for a student without an IEP.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	
E27	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	X Charter school student data X Student data from nearby school districts	<u>Yes</u>	<u>No</u>	Method schools actually serve a more diverse population than Dehesa.
E28	Charter school enrollment forms indicate compliance with all applicable laws, including prohibition on collecting information regarding immigration status; prohibition on collecting social security numbers unless required by law; and, as required by Education Code section 49452.9(a), health care coverage options and enrollment assistance information.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	Just have a question on the one unasked HLS question  See item E6 above

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E29	If charter school has used lottery system to determine which students will be allowed to enroll, process was held in the manner described in the approved charter.	<input checked="" type="checkbox"/> Approved charter <input checked="" type="checkbox"/> Admissions/enrollment forms and policies <input checked="" type="checkbox"/> Lottery procedures	<u>Yes</u>	<u>No</u>	
<b><u>Discipline</u></b>					
E30	Charter school discipline policies and practices are consistent with terms of charter.	<input checked="" type="checkbox"/> Approved charter <input checked="" type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	
E31	Student discipline procedures comply with due process requirements set forth in Education Code section 47605, charter, and/or discipline policies and procedures, including all requirements for disciplining students with disabilities.	<input checked="" type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities <ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
E32	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	<input checked="" type="checkbox"/> Discipline data <input checked="" type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Health and Safety</u></b>					
E33	Charter School has and annually updates its school safety plan, addressing fire emergencies, earthquakes, criminal incidents, accidents, injuries, and other threats to the health and safety of students and staff, consistent with Education Code requirements.	X School safety plan	<u>Yes</u>	<u>No</u>	requested-received
E34	Staff has been trained in health, safety, and emergency procedures, and appropriate first aid supplies are kept on hand.	X Training sign-in sheets • Observation of main office	<u>Yes</u>	<u>No</u>	first aid/cpr certs provided. sign-ins from other training such as mandated reporter training.
E35	Charter school has a policy/procedure for visitors to enter and leave campus.	• Policy or procedure	Yes/No	N/A	n/a (no campus)
E36	Charter school provides for the screening of pupils’ vision, hearing, screening for scoliosis, and required immunizations.	• Records of student screenings	<u>Yes</u>	<u>No</u>	The school provided an updated policy that states that “The school recommends that children undergo a yearly speech, hearing, and eye examination.”

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E37	If charter school serves students in grades 7-12, governing board has adopted Suicide Prevention Policy that was created in conjunction with stakeholders, specifically lists its high-risk groups, addresses the needs of those high-risk students, and was updated in the last 5 years.	<ul style="list-style-type: none"> <li>X Suicide Prevention Policy</li> <li>X Board meeting minutes</li> </ul>	<u>Yes</u>	<u>No</u>	
E38	If charter school qualifies for FRPL for all meals that it provides, it has applied to provide a universal meal service to all students at the school, or, if not, has submitted a governing board resolution to the state claiming a fiscal hardship (with evidence that those finding are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> <li>• Application for universal meal service</li> <li>• Board resolution</li> </ul>	Yes	<u>N/A</u>	N/A
E39	Charter school provides at least one meal per day to students who qualify for FRPL, except as provided for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Executive director (or equivalent) interview</li> </ul>	N/A	<u>N/A</u>	see above
E40	Charter school posts on its website in a prominent, conspicuous location, the Title IX information, including the name and contact number/e-mail for the Title IX Coordinator for that school.	<ul style="list-style-type: none"> <li>• Screenshot from website</li> </ul>	Yes	<u>No</u>	Method’s Director of Human Resources and Compliance will be the designated Title IX Coordinator, undergo Title IX training through ATIXA, and provide required contact information in a conspicuous location on the Method Schools website.

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E41	If charter school serves students in grades 7-12, it provides comprehensive sexual health and HIV prevention education, as required by Education Code section 51930, et seq.	X Sexual health and HIV prevention education course description	<u>Yes</u>	<u>No</u>	
E42	Charter school has developed methods for informing parents/guardians of students in grades 6-12 regarding human trafficking prevention resources, as required by Education Code section 49381.	X Policy or other description of method for informing parents/guardians	<u>Yes</u>	<u>No</u>	info-received part of CYHA education
<b><u>Parent Notifications</u></b>					
E43	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	X Notice	<u>Yes</u>	<u>No</u>	requested-received
E44	If charter school serves students in 11th grade, parents of those students are notified by January 1st that the students will be deemed a Cal Grant applicant unless the student opts out, as required by Education Code section 69432.9(d)(1).	X Notice	<u>Yes</u>	<u>No</u>	requested-received



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E45	If charter school serves students in 12th grade, parents of those students are notified of student’s GPA by October 1st, as required by Education Code section 69432.9(c)(2).	X Notice	<u>Yes</u>	<u>No</u>	requested-received
E46	Charter school notifies parents at least twice a year regarding how to initiate access to available student mental health services on campus or in the community.	X Notice	<u>Yes</u>	<u>No</u>	requested-received
<b><u>Student Records</u></b>					
E47	Charter school maintains comprehensive records regarding its students.	X Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number	<u>Yes</u>	<u>No</u>	disproportionate enrollment from outside of San Diego county-see E25 above
E48	Charter school maintains student records, including special education records, in a confidential and secure location.	X Policy regarding confidentiality of student records • Observation of main office	<u>Yes</u>	<u>No</u>	received policy on records
E49	Charter school has a policy or procedure for parents to review student files, including a log.	X Policy regarding review of records	<u>Yes</u>	<u>No</u>	
E50	Charter school has policy or procedure regarding release of student information.	X Policy regarding release of student information	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E51	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	letter certifying-received

# Method School: Special Education

## Context

Method Schools is authorized by the Dehesa School District and functions as a public school within the district for special education purposes. As a member of the East County Special Education Local Plan Area (SELPA), students have access to the full continuum of programs and services.

Method School is an online independent study program. Special education supports and services are provided based on a student's Individualized Education Program (IEP). Both formal and informal assessment measures are utilized to monitor student progress and assist in making data driven decisions related to instruction, goals and services. Students are enrolled in general education classes and receive their special education services through one on one or small group sessions with a credentialed education specialist. Related services, such as, speech and language therapy, occupational therapy, etc., are provided by an approved non-public agency (NPA). As a follow up to a corrective action from last year, service providers are now utilizing the Service Tracker tool within SEIS to ensure accountability for service delivery. Contracted providers utilize their own tracking system and are required to upload into SEIS.

The enrollment process for students with disabilities follow the same procedures as general education students, however, additional steps are put into place to ensure students receive the necessary supports. Upon initial enrollment, the IEP is reviewed by the special education director or coordinator to ensure appropriate services are provided. The student is assigned a student success manager as well as specialized academic instruction according to their IEP minutes. The team then reviews the IEP and student performance within the first 30 days (30-day interim) to make adjustments to the IEP or make recommendations as needed. These policies are not outlined in the Method Schools policy and procedural manual but were shared during the interview with the special education director and coordinator.

The Method Schools Parent and Student manual outlines a clear referral process for when the general education team or a family have concerns related to a student's academic performance. Method utilizes a multi-tiered system of support (MTSS) model where students may be required to attend additional interventions. Additional interventions may include, required attendance in additional targeted direct instruction (TDI), more frequent progress check-ins with parents and teachers, assignment of a student success manager, adapted or modified online curriculum. Interventions are put into place for a minimum of 6-8 weeks. If the prescribed interventions are not successful, the general education teacher will initiate a student success team (SST) meeting in which teachers, parents and the student, when applicable, meet to discuss obstacles and challenges and determine next steps, which may include continued interventions or referral for special education assessment.

Students identified as eligible for special education services have access to the full range of services as indicated by their IEP. The sampling of IEP's submitted for review demonstrate that all required members of the IEP team were present and participated in the meeting. East County SELPA policies indicate clear timelines in accordance with the Individuals with IDEA and the California Department of Education (CDE).

According to data from December 2020, Method Schools does not enroll a disproportionate number of students with disabilities compared to that of the state average. The identification rate of 13.0% for special education was determined using the CALPADS enrollment of 522 and SEIS counts of 68. This is consistent with the 2020 state average of 11.7%. Discipline data from 2018-2019 (most recent available due to Covid), data provided indicate that there were no suspensions for students with disabilities. There is no change to the CPA State Accountability data for 2019-2020. Due to COVID-19, all state assessments were suspended, and measures continue to be taken from 2018-2019 data.

## Compliance Area Concerns

- The policies and procedures manual does not clearly outline the enrollment process for students with an IEP. This is a low area of concern.

## Best Practices

- Clearly outline within the procedure manual, the process for enrolling students with active IEP's (30-day interim)
- Consider having contract service providers utilize the SEIS service tracker tool rather than uploading their service minutes.

Assigned District Staff Person: Jade Fernandez  
 Position of Assigned Staff Person: Special Education Director

**METHOD SCHOOL - SPECIAL EDUCATION OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Special Education Program</u></b>					
S1	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> <li>• Student handbook</li> <li>X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission</li> <li>X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	No	Procedural manual does not identify the process or policies for students enrolling with an IEP.
S2	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services.	<ul style="list-style-type: none"> <li>• Student handbook</li> <li>X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission</li> <li>X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Policies outline steps for identifying students with suspected disabilities, including the implementation of interventions within the GE setting, team follow-up and finally possible referral.
S3	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> <li>• Student handbook</li> <li>X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission</li> <li>X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	The procedural manual does identify the major timelines such as 60 days to complete assessment.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
S4	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	X Sample IEPs X Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	IEP’s indicate that students have access to a range of services
S5	All required members of IEP teams attend IEP meetings.	X Sample IEPs	<u>Yes</u>	<u>No</u>	Sample IEP’s indicate that all team members are present
S6	Charter school does not enroll a disproportionately small number of students with disabilities.	X Data demonstrating percentage of students with disabilities in charter school	<u>Yes</u>	No	2020 Dashboard data-6.5% - a bit on the low end compared to 2020 state average of 11.7%  Dehesa 2020- 18.1%
S7	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Students with 504’s are supported out of student services and not special education
S8	Board and charter school administration are aware of and familiar with the terms of the special education MOU between the District and the charter school.	X Special Education MOU • Review of agenda and minutes • Board President interview	<u>Yes</u>	<u>No</u>	The renegotiated MOU started July 1, 2020.
S9	Charter school has fulfilled its obligations under the MOU, including the submission of any required documentation to the authorizer.	• Records of authorizer	<u>Yes</u>	<u>No</u>	

## **Method School: Facilities/Operations**

### **Context**

The Method School was authorized by Dehesa School District in 2014 as a resource center. It is currently located in a strip mall at 24620 Jefferson Avenue, Murrieta CA 92562 in Riverside County. After its renewal in 2018 It became a virtual independent study school and now has an enrollment of approximately 578 students, grades K – 12. Method School is currently using the facility as administrative offices. However, in response to the COVID-19, Method’s precautions had the staff working from home and plan to delay such a move. A visit to the site confirmed this.

### **Compliance Area Concerns**

- There were no compliance area concerns.

### **Best Practices**

- Possibly include the COVID precautions in safety plan.

Assigned District Staff Person: Tracy Robertson  
 Position of Assigned Staff Person: Director, HR & Compliance

**METHOD SCHOOL - OPERATIONS AND FACILITIES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Maintenance of Facilities</u></b>					
O1	A designated person is responsible for overseeing operations and facilities management.	<input type="checkbox"/> X Staff organizational chart	<u>Yes</u>	<u>No</u>	Tracy Robertson
O2	Facilities are adequate for number of students and types of programs.	<input type="checkbox"/> NA Capacity chart for campus facilities <input type="checkbox"/> X Operations manager (or equivalent) interview	<u>No</u>	<u>No</u>	Method is a virtual school
O3	Charter school has process for routine inspections of grounds to ensure that they remain in good condition and free from mold and other hazardous substances.	X Inspection logs <input type="checkbox"/> X Operations manager (or equivalent) interview	Yes	No	Like last year a Fire Marshall inspection from lessor met this item.
<b><u>Legal Compliance</u></b>					
O4	All facilities meet Americans with Disabilities Act requirements.	<input type="checkbox"/> ADA certification	<u>No</u>	<u>No</u>	Management company and City are unable to produce such a document. However, ADA requirements were observed.
O5	All single-user restrooms have been designated as all-gender restrooms.	X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O6	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan	<u>No</u>	<u>No</u>	Commercial facility built after 1986, meets AHER
O7	Charter school has certificate of occupancy on file.	<input checked="" type="checkbox"/> X Certificate of occupancy	<u>Yes</u>	<u>No</u>	Part of Building Permit
O8	Charter school has conditional use permit on file, as applicable.	X Conditional use permit	<u>Yes</u>	<u>No</u>	
O9	Charter school has safety inspection by local fire department on file.	<input checked="" type="checkbox"/> X Safety inspection by local fire department	<u>Yes</u>	<u>No</u>	
O10	If charter school participates in an interscholastic athletic program, it has a written emergency action plan and at least one automated external defibrillator for the school.	X Emergency action plan X Operations manager (or equivalent) interview	<u>Yes</u>	<u>N/A</u>	Comprehensive School Safety Plan  No athletics
O11	If charter school serves any grades 6-12, and meets the 40% pupil poverty rate, it provides feminine hygiene products, including tampons and sanitary napkins, in a least 50% of the school’s restrooms.	X Operations manager (or equivalent) interview	<u>YES</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O12	If charter school is aware of a lactating pupil, it has made accommodations for lactation other than a restroom and has provided a place to safely store milk.	X Operations manager (or equivalent) interview	<u>NA</u>	<u>N/A</u>	No students on campus
O13	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	X Certificates of insurance	<u>Yes</u>	<u>No</u>	
O14	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1, as recently amended by Assembly Bill 1507.	X Operations manager (or equivalent) interview X Designation of any charter facilities (e.g., resource centers, etc.) N/A Review of addresses of facilities	<u>Yes</u>	<u>No</u>	Is still only site
O15	Charter school has identified all facilities and their respective locations, including those that are available for use by students enrolled in the charter school for any purpose related to the charter school’s educational program (whether or not such facility(ies) is/are owned, leased, rented, or subleased by the charter school or a different entity).	<input type="checkbox"/> List of facilities X Operations manager (or equivalent) interview	<u>No</u>	<u>No</u>	Is still only site

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O16	Charter school has not added or begun using any new or different facilities that are not identified in the most recent charter petition or material revision (as applicable) approved by the District’s governing board.	<input type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview <input type="checkbox"/> Authorizer records	<u>No</u>	<u>No</u>	Is still only site

# **Dehesa Charter Oversight Report**

**Diego Hills  
Central**

# Diego Hills Central: Governance

## Context

Diego Hills Central is governed by the 3-member board (bylaws allow up to 5) of the Diego Plus Education Corporation (DPEC), which also governs another charter school (Diego Valley East Public Charter School). Both schools are served by Lifelong Learning Administration Corporation (LLAC) and share some staff with other schools through LLAC. The corporation previously had a sole statutory member, Educational Advancement Corporation, which appointed the board members for DPEC. Following the 2019-2020 charter review, the corporate structure was changed and the DPEC board members are now chosen by the board. Allocation of costs for LLAC staff was also revised and the DPEC board assumed responsibility for evaluation of the Area Superintendent responsible for the schools under its governance.

## Compliance Area Concerns

Since the 2019-2020 charter review, the school has made changes in corporate structure in response to Dehesa concerns about potential conflicts of interest and has clarified its financial relationship with LLAC. As a consequence of these and other changes, no areas of “high” concern were noted in this year’s review. The following “low” level concerns were noted:

- School leader evaluation is being transferred to the governing board, which may result in improvements to the process. Most recent evaluation provided did not address specific school outcomes.
- Parent and Advisory Committee and English Learner Advisory Committee exist and were described in the materials provided, but both still lack parent leadership and consistent participation. School leader reports increased participation in virtual format, which the school plans to continue. Will seek parent leaders out as meetings continue.

## Best Practices:

The following suggested changes in governance may support the school’s further improvement:

- Board meeting observed was effectively led by the President, who had clearly reviewed materials carefully and asked thoughtful, detailed questions. Other board members participated substantially less and seemed less familiar with the materials. Board may wish to explore ways to better take advantage of expertise of all board members and increase engagement. Additional trainings, informal meetings with other charter board members, and assigning tasks to board members or committees are options to consider.
- Expanding the range of knowledge and experience of the board members could also be accomplished through adding board members, as the bylaws allow up to 5 members. An effort to do so is currently underway, under the guidance of a board recruitment policy adopted last year.

Assigned District Staff Person: Lindsay Reese and Ruth Newell  
 Position of Assigned Staff Person: Area Superintendent, Board President

**DIEGO HILLS CENTRAL - GOVERNANCE OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Organizational Management</u></b>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<ul style="list-style-type: none"> <li>× Articles of Incorporation</li> <li>× Bylaws</li> </ul>	<u>Y</u>	<u>No</u>	Bylaws are on school website, along with extensive policy documents.
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<ul style="list-style-type: none"> <li>× Bylaws</li> </ul>	<u>Y</u>	<u>No</u>	Bylaws updated.
G3	Any changes to charter or bylaws have been approved by charter school’s governing board and submitted to the authorizer.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Changes made were approved by the governing board and submitted to the authorizer as part of follow-up from prior year oversight report.
G4	Charter school has an organizational chart and job descriptions that delineate clear separation of duties and responsibilities.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Organizational chart</li> <li>× Job descriptions CEO/CBO</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G5	Governing board has a robust, outcomes-based process for evaluating the charter school leader.	<ul style="list-style-type: none"> <li>× Most recent charter school leader evaluation</li> <li>× Board president interview</li> </ul>	<u>Y</u>	<u>Low</u>	Information provided did not reflect an outcomes-based approach. Change to a board-led evaluation process may result in a different approach.
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> <li>× Executive director (or equivalent) interview</li> <li>• Teacher interview</li> <li>× Information available on charter school’s website</li> </ul>	<u>Y</u>	<u>Low</u>	PAC and ELAC exist, but although attendance has improved with use of virtual meetings, parent leadership still lacking.
<b><u>Composition</u></b>					
G7	Charter school has a list or roster of governing board members that is publicly accessible.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Information is available on charter school’s website</li> </ul>	<u>Y</u>	<u>No</u>	
G8	Composition of governing board is consistent with approved charter.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Neither charter nor bylaws provide guidance on the composition of the board or criteria for selecting board members.
G9	Governing board is diverse and reflects charter school and community population.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Description of school and community demographics</li> </ul>	<u>Y</u>	<u>No</u>	Community representation is reasonable, given the small size of the board.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G10	Governing board members have relevant knowledge and experience in key areas, such as education, finance, legal, real estate, and fundraising.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Information posted on charter school’s website</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Completed Form 700s</li> <li>× Completed Form 990s</li> <li>× Agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of conflict of interest, however board members govern 2 different schools whose interests may at times diverge.
<b><u>Meetings</u></b>					
G12	Governing board conducts meetings as frequently as is needed to ensure that it addresses necessary charter school business, and such meetings are consistent with timelines set forth in charter and bylaws.	<ul style="list-style-type: none"> <li>× Annual governing board meeting calendar</li> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	
G13	Governing board members receive annual training regarding Brown Act requirements.	<ul style="list-style-type: none"> <li>× Sign-in sheet from Brown Act training</li> <li>× Copy of materials (e.g., Power Point slides)</li> </ul>	<u>N</u>	<u>No</u>	Training undertaken individually, rather than together.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G14	Meetings are noticed and conducted in accordance with the Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of accessibility of meeting (location, online participation, public comment time, etc.)</li> <li>× Screenshot of charter school website</li> </ul>	<u>Y</u>	<u>No</u>	Agendas are well-prepared and Brown Act compliant. Based on observation and minutes, meetings are conducted in accordance with requirements.
G15	Discussion during Board meetings is limited to properly-noticed items on agenda.	<ul style="list-style-type: none"> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	No non-agendized discussion at observed meeting.
G16	Board use of closed session during noticed meetings is consistent with Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	Closed sessions properly noticed and reports of action taken were appropriate.
G17	Meeting agendas include sufficiently-detailed items of business to be transacted and any necessary action to be taken by the Board.	<ul style="list-style-type: none"> <li>× Sample meeting agendas</li> </ul>	<u>Y</u>	<u>No</u>	Agendas are sufficiently detailed.
G18	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	<ul style="list-style-type: none"> <li>× Sample meeting agendas</li> <li>× Public comment policy</li> </ul>	<u>Y</u>	<u>No</u>	Complete public comment notice on agenda.



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G19	Board members solicit and provide and/or solicit input from the community served.	<ul style="list-style-type: none"> <li>× Board biographies</li> <li>× Advisory committee/PTO documents</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>Low</u>	No evidence of effort to solicit input reflected in minutes or board observation. Insufficient information on role/activity level of PAC or ELAC.
G20	Minutes are approved and thereafter made available to the public.	<ul style="list-style-type: none"> <li>× Sample meeting minutes</li> <li>× Screenshot of charter school website</li> </ul>	<u>Y</u>	<u>No</u>	Minutes approved at subsequent regular meeting on consent agenda and posted on website. Minutes are complete and clear.
G21	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	<ul style="list-style-type: none"> <li>× Board meeting minutes</li> </ul>	<u>N</u>	<u>N/A</u>	This item is not applicable; DHC is not subject to Ed Code section 49431.9 because the school does not participate in the federal National School Lunch Program or federal School Breakfast Program.
<b><u>Board Policies</u> [Note: The oversight team lead may request additional policies for review that are not listed here.]</b>					
G22	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<ul style="list-style-type: none"> <li>× Parent handbook</li> <li>× Student handbook</li> <li>× Employee handbook</li> </ul>	<u>N</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G23	Governing board has adopted policies related to conflict of interest, which align with the requirements of Education Code section 47604.1.	× Board policies	<u>Y</u>	<u>No</u>	Revised conflict of interest code and policy adopted in response to 2019-2020 review.
G24	Governing board has adopted/updated policies related to student discipline and due process.	× Board policies	<u>Y</u>	<u>No</u>	Updated June 2020; policy tracks Education Code.
G25	Governing board has adopted/updated policies related to complaints and investigations.	× Board policies	<u>Y</u>	<u>No</u>	Adopted 2019; not yet updated.
G26	Governing board has adopted/updated internal control policies (and related forms and systems).	× Board policies	<u>Y</u>	<u>No</u>	
G27	Governing board has adopted/updated policies related to bank signature authorizations.	× Board policies	<u>Y</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G28	Governing board has adopted/updated policies related to allowable purchases and purchasing authority.	× Board policies	<u>Y</u>	<u>No</u>	
G29	Governing board has adopted/updated policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	× Board policies	<u>Y</u>	<u>No</u>	Adopted and updated.
G30	Governing board has adopted/updated policies related to employee harassment.	× Board policies	<u>Y</u>	<u>No</u>	In employee handbook.
G31	Governing board has adopted and annually updates its safety plan by March 1 <sup>st</sup> to include all legal requirements applicable to charter schools.	× Board policies × Meeting agenda and minutes reflecting annual review and update	<u>Y</u>	<u>No</u>	Revised November 2020; COVID component approved by board in March 202.
G32	Governing board has adopted policies related to immunization records and administration of medication.	× Board policies	<u>Y</u>	<u>No</u>	No separate immunization policy but addressed in parent/student handbook. Medications policy approved in August 2019.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G33	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	× Board policies	<u>Y</u>	<u>No</u>	No separate student records policy, but addressed in parent/student handbook.
G34	Governing board has adopted policies related to Section 504/IDEA compliance.	× Board policies	<u>Y</u>	<u>No</u>	Multiple relevant policies.
<b><u>Education Code Assurances</u> [Note: As part of the review, the oversight team lead will evaluate whether such assurances are consistent with the charter school’s actual operations, based on available information. “Submitted” in this context means some information was available for review, although a full audit was not conducted.]</b>					
G35	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	× Policy review • Executive director (or equivalent) interview × Review of any complaints	<u>Y</u>	<u>No</u>	No evidence of non-compliance
G36	Charter school has complied with assurance that it shall not charge tuition.	× Policy review • Executive director (or equivalent) interview	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G37	Charter school has complied with assurance that it shall not discriminate against any pupil on the basis of the characteristics listed in Education Code section 220.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G38	Charter school has complied with assurance that it shall admit all students who reside in California who wish to attend (up to the Charter School’s capacity based upon space, staff, or Charter School policy).	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of student demographics and enrollment data</li> <li>× Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G39	Charter school has complied with assurance that it shall determine by public random drawing, which students, other than those already enrolled, will be allowed to enroll if the number of pupils who wish to attend charter school exceeds charter school’s capacity and make reasonable efforts to accommodate the growth of charter school.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G40	Charter school has complied with assurance that it shall comply with EC 47605(d)(2) in regard to the establishment of preferences for enrollment which shall not result in limiting enrollment access for pupils with: disabilities, academically low-achieving pupils, English Learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged or pupils based on nationality, race, ethnicity, or sexual orientation.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G41	Charter school has complied with assurance that it shall notify the school district of residence of the pupil’s last known address within 30 days if a pupil is expelled or leaves charter school without graduating or completing the school year for any reason	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>N</u>	<u>No</u>	Dehesa has received none; school states that it does send them and provided a sample.

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Memorandum of Understanding</u></b>					
G42	Board and charter school administration are aware of and familiar with the terms of any approved MOUs or agreements between the District and the charter school.	<ul style="list-style-type: none"> <li>× Memoranda of understanding</li> <li>× Review of agenda and minutes</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	Operational MOU approved by board in August 2020; discussion recorded in minutes was minimal.
G43	Charter school has fulfilled its obligations under the MOU(s), including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	School appears to have met governance-related obligations of operational MOU.
G44	Charter school responds promptly to authorizer inquiries.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.
G45	Charter school informs authorizer in advance of any proposed material changes to program or operations.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Complaint Policies and Procedures</u></b>					
G46	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom, as applicable, and website.	<ul style="list-style-type: none"> <li>× Board policies</li> <li>× Review of student/parent and staff handbooks</li> <li>• Observation of classrooms</li> <li>× Observation of website</li> </ul>	<u>Y</u>	<u>No</u>	Complaint form accessible on website; process described in parent/student handbook with links to form. On-site postings addressed in other portions of review.
G47	Complaint policies and procedures are available in the main/front office or website for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Observation of main office / website</li> </ul>	<u>Y</u>	<u>No</u>	On-site postings addressed in other portions of review.
G48	Complaints are handled in a manner that is consistent with the charter school’s policies and procedures, and there is no apparent bias or conflicts of interest.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Board President interview</li> <li>× School leader interview</li> </ul>	<u>Y</u>	<u>No</u>	No complaints referenced in board agendas; insufficient evidence to evaluate.
G49	Charter school has policies that allow for student, parent, and staff complaints to be appealed to the charter school’s Board.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Review of website</li> <li>× Review of student/parent and staff handbooks</li> </ul>	<u>Y</u>	<u>No</u>	General complaint policy includes board appeal.
G50	Charter school has policies for student disciplinary actions that include appropriate due process.	<ul style="list-style-type: none"> <li>× Review of charter</li> <li>× Review of policies</li> <li>× Review of student/parent handbook</li> </ul>	<u>Y</u>	<u>No</u>	School adheres to Ed Code 48900 et seq. for its Suspension/Expulsion policy.



No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G51	Charter school leadership discloses and ensures Board is fully informed of any anticipated or pending litigation.	<ul style="list-style-type: none"> <li>× Board President interview</li> <li>× School leader interview</li> <li>× Review of agendas</li> </ul>	<u>Y</u>	<u>No</u>	One closed session item was on the agenda for “anticipated litigation”; no evidence of failure to inform.
<b><u>Planning</u></b>					
G52	Board adopted a Learning Continuity Plan (2020-21 school year only) by September 30, 2020, which was submitted to the authorizer and San Diego County Office of Education.	<ul style="list-style-type: none"> <li>× Review of LCP</li> <li>× Authorizer records</li> </ul>	<u>Y</u>	<u>No</u>	LCP was adopted and submitted
G53	Board held a public hearing for review and comment for both the Learning Continuity Plan and budget overview for parents/guardians.	<ul style="list-style-type: none"> <li>× Sample agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	Public hearing held for LCP and budget overview, though unclear what effort was made to encourage participation.

815-21/4810420.1

## Diego Hills Central: Finance/Business

### Context

Diego Hills Central Charter projected enrollment during its Adopted Budget for FY 2020-2021 of 381 students. However, due to “Hold Harmless” legislation for the year the school receives funding from the state based on its prior year’s ADA of 723.93. The school benefitted significantly from this legislation with an increase in total revenues of approximately \$4.0 million (2<sup>nd</sup> Interim Projected Revenues of \$9.0 M vs Adopted Budget Revenues of \$5.1M). Per the 2<sup>nd</sup> Interim report from the school, the Ending Fund Balance for FY 2020-2021 is projected to be \$425,559 representing 4.75% of total projected expenditures. Interviews and discussions were held with the Area Superintendent for the school as well as the finance team of LLAC.

### Compliance Area Concerns

- No area concern regarding checklist items for Finance/Business.
- No audit findings from the recent FY 2019-2020 audit report

### Best Practices

- Well organized responses and summary via a matrix including document attachments per each checklist item from DCOT Finance/Business Checklist. The matrix was extremely helpful during review process. Reporting systems and processes shared during the interview process was excellent.
- School provided response to Authorizing District’s Corrective Action Item #12 requesting an analysis of other similar “Outside Vendor” rates for Administrative and Educational services of other charter schools. The school hired the independent organization of BlankRome to conduct the analysis. The completed analysis by BlankRome reported the results of the review of approximately 26 such vendor agreements by other charter schools. The BlankRome report indicated Diego Hills Central Charter School with its 15% combined fee is well within the rates charged for such services by the other 26 vendors surveyed. The report also provided the perspective of the school receiving more comprehensive services from SAR and SER when compared to the other vendors reviewed.

Assigned District Staff Person: Lindsey Reese, Claudio Wohl and Guita Sharifi

Position of Assigned Staff Person: Area Superintendent, Senior V.P of Finance LLAC, CFO at LLAC

**DIEGO HILLS CENTRAL - FISCAL AND BUSINESS SYSTEMS OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Budget, Accounting, and Financial Reporting</u></b>					
<u>F1</u>	Governing board policies address budget, accounting, and financial reporting.	X Board policies	<u>Yes</u>	<u>No</u>	Updated policies using FCMAT Best Practices document of 12/3/2020.
<u>F2</u>	Current budget has been approved by the governing board.	X Current/adopted budget X Board meeting minutes	<u>Yes</u>	<u>No</u>	
<u>F3</u>	Charter school has clear process for reviewing and revising the budget (e.g., in light of changes in student enrollment or operations), including governing board approval.	X Board meeting minutes X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	At a minimum, school reviews and revises its budget three times a year (Adopted Budget, 1 <sup>st</sup> Interim and 2 <sup>nd</sup> Interim Reports)
<u>F4</u>	Charter school’s Learning Continuity Plan aligns with LCFF Calculator (applicable to 2020-21 school year only).	X Learning Continuity Plan X LCFF Calculator	<u>Yes</u>	<u>No</u>	
<u>F5</u>	Budget provides for all financial obligations.	X Current budget	<u>Yes</u>	<u>No</u>	
<u>F6</u>	Governing board approves all required financial reports.	X Required financial reports X Board meeting minutes	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	X Proof of submission	<u>Yes</u>	<u>No</u>	
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	X Financial records	<u>Yes</u>	<u>No</u>	
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	X Financial records, Interim Reports	<u>Yes</u>	<u>No</u>	Required minimally three times a year for Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reporting
F13	Charter school’s business accounting system complies with state accounting and reporting requirements.	X Director of finance (or equivalent) interview Alternate SACS Reports	<u>Yes</u>	<u>No</u>	Complies

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Audit</u></b>					
<u>F14</u>	Charter school has selected a state-approved auditing firm, and annually submits independent auditor selection certification and contract to authorizer and county office of education by March 31st.	X Proof of submission of auditor certification and contract X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Audit firm state approved
<u>F15</u>	Charter school has developed auditing schedule/timeline.	X Auditing schedule/timeline	<u>Yes</u>	<u>No</u>	
<u>F16</u>	Charter school has submitted prior year’s financial audit to authorizer.	X Previous year’s audit X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F17</u>	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	X Not applicable, no Findings from Audit Report	<u>Yes</u>	<u>N/A</u>	Not applicable. No findings reported
<b><u>Financial Condition</u></b>					
<u>F18</u>	Charter school maintains an appropriate level of reserves for economic uncertainties.	X Financial records, Adopted Budget, Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Per the school’s FY 2020-21 2 <sup>nd</sup> Interim Report, a projected Ending Balance of \$420,559 from a yearly revenue projection of \$9.0M indicates a 4.75% Reserve which is appropriate.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F19</u>	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	X Financial records, Adopted Budget, Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F20</u>	Based on the projections, charter school will be able to meet its financial obligations and maintain an appropriate level of reserves in the current and two subsequent fiscal years.	X Financial records, Adopted Budget, Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	School benefited tremendously from the state’s “Hold Harmless” legislation related to the COVID-19 Pandemic. School’s revenue projections increased from Approximately \$5.0M at its Adopted Budget projections to a projected \$9.0M at its 2 <sup>nd</sup> Interim Reporting. The increased revenue change was mostly due to the “Hold Harmless” legislation allowing school’s to use the Prior Year’s ADA for revenue calculations in the current year.
<b><u>Cash Receipts</u></b>					
<u>F21</u>	Charter school has policies addressing cash receipts.	X Cash receipt policy	<u>Yes</u>	<u>No</u>	
<u>F22</u>	Charter school maintains records of all monies received (e.g., issues receipts).	X Cash receipt policy X Sample records of cash receipts X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F23</u>	Charter school deposits monies in a timely manner.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F24</u>	Charter school maintains records of deposits of all monies.	X Cash receipt policy X Sample records of cash deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F25</u>	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F26</u>	Charter school’s board has adopted a resolution or formally approved any interfund transfers via the due to/due from process, which details all material facts related to such transfers.	X No interfund transfers via due to/due from process occurred	<u>Yes</u>	<u>N/A</u>	No interfund transfers transactions to date
<b><u>Disbursements</u></b>					
<u>F27</u>	Charter school has policies addressing disbursements.	X Disbursement policy	<u>Yes</u>	<u>No</u>	
<u>F28</u>	Disbursements require all of the following: (1) an original invoice from the vendor; (2) a receiving document; (3) appropriate approval of the purchase; and (4) ratification by the governing board, if amount exceeds maximum dollar amount set forth in charter school policy.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F29</u>	Checks are signed by authorized employees.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

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<u>F30</u>	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F31</u>	Charter school has segregated duties between purchasing, receiving, and accounts payable.	X Staff organizational chart X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Payroll</u></b>					
<u>F32</u>	Charter school has a salary schedule or other satisfactory salary structure.	X Salary schedule (Binder 6, Tab 21)	<u>Yes</u>	<u>No</u>	
<u>F33</u>	Tax deposits are completed in a timely manner.	X Proof of tax deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F34</u>	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	X Proof of recording of earnings X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	School does not provide contributions to PERS and STRS for employees. However, school does provide up to a 10% match in 403(b) plans.
<u>F35</u>	Charter school has system to provide STRS data to authorizer.	X Proof of submission of STRS data (N/A) X Director of finance (or equivalent) interview	<u>Yes</u>	<u>N/A</u>	
<u>F36</u>	Charter school has system to maintain employee earning records for preparation of W-2s.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F37</u>	Charter school adheres to provisions of any leased teacher/staff agreement or MOU, including invoicing for every leased teacher/staff member and Board approval of same.	X Not Applicable	<u>N/A</u>	<u>N/A</u>	Not applicable. No Leased Teacher or staff agreement exists
<b><u>Equipment Inventory</u></b>					
<u>F38</u>	Charter school has policies addressing the purchase and maintenance of equipment.	X Equipment purchase and maintenance policy	<u>Yes</u>	<u>No</u>	
<u>F39</u>	Charter school maintains an equipment inventory that is physically located on each site.	X Equipment inventory	<u>Yes</u>	<u>No</u>	
<u>F40</u>	Equipment purchased with federal funds is properly identified.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Student Attendance (All Schools)</u></b>					
<u>F41</u>	Charter school uses a generally approved attendance accounting system.	X Screenshot of attendance accounting system	<u>Yes</u>	<u>No</u>	
<u>F42</u>	There is a designated staff person responsible for administering attendance.	X Staff organizational chart. Discussion with Director	<u>Yes</u>	<u>No</u>	
<u>F43</u>	Charter school calendar includes a minimum of 175 instructional days.	X School calendar	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F44</u>	Charter school class/bell schedule ensures minimum instructional minutes (36,000 for K, 50,400 for 1st - 3rd, 5400 for 4th - 8th, 64,800 for 9th - 12th).	X Class/bell schedule (Binder 6, Tab 29)	<u>Yes</u>	<u>No</u>	
<u>F45</u>	Student absences are excluded from apportionment days.	X Attendance reports X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F46</u>	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	X Attendance reports X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F47</u>	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	X Proof of submission	<u>Yes</u>	<u>No</u>	“Hold Harmless” legislation funded school at prior year ADA levels due to COVID-19 Pandemic
<u>F48</u>	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F49</u>	Charter school has clear procedures for disenrolling students and providing notification to the student’s district of residence.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F50</u>	Charter school has clear procedures for claiming and reporting ADA to the state.	X Policies and procedures related to claiming and reporting ADA	<u>Yes</u>	<u>No</u>	

<u>No.</u>	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	<u>Findings/Comments</u>  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F51</u>	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F52</u>	Any changes in enrollment/ADA from school year to school year are reasonable and do not exceed threshold under Operations MOU that would trigger the need for a material revision to the charter.	X Teacher roster and monthly ADA reports	<u>Yes</u>	<u>No</u>	School benefitted from recent “Hold Harmless” state legislation due to COVID-19 pandemic. School had projected lower ADA for this fiscal year, however “Hold Harmless” legislation kept funding at Prior Year’s ADA levels
<b><u>Student Attendance (Schools Offering Independent Study)</u></b>					
<u>F53</u>	Charter school annually certifies independent study courses as being of the same rigor and educational quality as classroom-based courses, including information regarding instructional minutes, as required by Education Code section 51749.5(a)(4).	X Certification Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F54</u>	Teachers and students communicate in person, by phone, or by other live visual or audio connection at least twice per month, as required by Education Code section 51749.5(a)(7).	X Independent study coordinator (or equivalent) interview  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F55</u>	Charter school retains evidence of satisfactory educational progress for each independent study student, including a file of representative samples of each student’s work products (signed/initialed and dated by supervising teacher).	X Sample grade books X Sample transcripts X Work samples	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F56</u>	Charter school does not offer courses required for high school graduation or UC or Cal State admission exclusively through independent study, as prohibited by Education Code section 51749.5(a)(13).	X List of course offerings	<u>Yes</u>	<u>No</u>	
<u>F57</u>	The program of each student in independent study is overseen by a certificated employee.	X Student enrollment report X Staff organizational chart X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F58</u>	Charter school meets ratio of ADA to FTE certificated employees required by Education Code section 51745.6(d) (i.e., 25:1 or ratio in largest unified school district).	X Student enrollment report X Staff organizational chart X Independent study coordinator (or equivalent) interview X Review of ratio calcs	<u>Yes</u>	<u>No</u>	
<u>F59</u>	Governing board has adopted and implemented written policy regarding the maximum length of time (by grade level and type of program) that may elapse between independent study assignment and completion.	X Board policy X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F60</u>	Governing board has adopted and implemented written policy regarding the number of missed assignments allowed before the school conducts an evaluation to determine whether student should remain in independent study.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F61</u>	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	X Sample agreements  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F62</u>	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F63</u>	Charter school does not provide any funds or other things of value to students who attend independent study programs (or their parents/guardians) that it does not provide to students who attend classroom-based programs (or their parents/guardians).	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F64</u>	Charter school claims ADA only for students who are residents of the county in which the apportionment claim is reported, or who are residents of a county immediately adjacent to the county in which the apportionment claim is reported.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F65</u>	Charter school maintains daily/hourly attendance credit register (separate from classroom attendance records) on a current basis as time values of student work products are evaluated by certificated teachers.	X Credit register, work samples X Independent study coordinator (or equivalent) interview X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F66</u>	Charter school claims apportionment credit for independent study only to the extent of the time value of student work products, as personally judged in each instance by a certificated teacher.	X Credit register, work samples X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F67</u>	Pursuant to Education Code section 47634.2, charter school has submitted a determination of funding form, and SBE subsequently issued a determination of funding.	X Request for determination of funding X SBE determination of funding	<u>Yes</u>	<u>No</u>	

815-21/4810246.1

## **Diego Hills Central: Personnel**

### **Context**

The Area Superintendent/Personnel is responsible for all Personnel processes at the charter site. All items on the Personnel Oversight Checklist were submitted on time in a very organized process. There was one area of low level concern from the Oversight checklist. All other items were met.

### **Compliance Area Concerns**

- There are no compliance area concerns.

### **Best Practices**

- Monitor low level concerns for the 21.22 review year.

Assigned District Staff Person: Lindsay Reese

Position of Assigned Staff Person: Area Superintendent: Personnel

**DIEGO HILLS CENTRAL - PERSONNEL OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>All Employees</u></b>					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	X Employee handbook X Employee policies X Approved charter N/A Employment-related MOUs	<u>Yes</u>	<u>No</u>	
P2	Charter school employee handbook and policies guarantee fair hiring practices.	X Employee handbook X Employee policies	<u>Yes</u>	<u>No</u>	
P3	Charter school enters employment contracts with all persons hired to work at school.	X Sample employment contracts	<u>Yes</u>	<u>No</u>	
P4	All employees have been fingerprinted, including Department of Justice background checks.	X Documentation of fingerprint clearance for all employees	<u>Yes</u>	<u>No</u>	
P5	All employees have passed TB test and results are current.	X Documentation of current TB test results for all employees	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u> <u>Yes / No</u>	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	X Certificates of training	<u>Yes</u>	<u>No</u>	
P7	If charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	X Certificates of training	<u>Yes</u>	<u>No</u>	
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	X Observation of main office /website	<u>Yes</u>	<u>No</u>	19-20 observation on site review.  Lindsay emailed DFEH poster picture
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	X Employee handbook	<u>Yes</u>	<u>No</u>	
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	X Employee handbook	<u>Yes</u>	<u>No</u>	
P11	Governing board approves personnel actions.	X Governing board minutes	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Certificated Employees</u></b>					
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	X Staff organizational chart X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operation MOU approved 8/20/20
P13	Charter school provides teachers with professional development opportunities.	X Professional development calendar X Professional development session agenda X Teacher interview	<u>Yes</u>	<u>No</u>	Teacher interview 3/3/21
P14	Teachers providing instruction in core subject areas have the required credentials and certifications to meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of credentials and certifications held by core teachers X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 8/20/20
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	X Staff organizational ) X Documentation of credentials and certifications held by teachers	<u>Yes</u>	<u>No</u>	
P16	Teachers providing special education and related services have required credentials and certifications.	X Staff organizational chart X Documentation of credentials and certifications held by special education teachers	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	<input checked="" type="checkbox"/> Sample evaluations <input checked="" type="checkbox"/> Teacher interviews	<u>Yes</u>	<u>No</u>	Teacher interview completed 3/3/21
<b><u>Classified Employees</u></b>					
P18	Classified employees who provide instructional support in core subject areas, special education, and English language learning meet state and federal requirements, terms of approved charter, and any MOUs.	<input checked="" type="checkbox"/> Staff organizational chart <input checked="" type="checkbox"/> Documentation of qualifications held by classified aides <input checked="" type="checkbox"/> Approved charter <input checked="" type="checkbox"/> Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 8/20/20

# Diego Hills Central: Educational Program & Student Services

## Context

Per their website Diego Hills Central Charter School is a non-profit public school that provides students personalized learning, career training, and life skills. They are located at 4348 54th Street, San Diego, CA 92115.

## Compliance Area Concerns

### 2020 Concerns

Special Education:

- Continue to work with the El Dorado County Charter SELPA to address the concerns regarding SPED participation in state testing and Performance Indicator Review requirements.
- Continue to work with the El Dorado County Charter SELPA to implement practices to effectively document and track services provided.

Educational Programs: none

### E5 - Low

The first concern is a Low Level Concern related to #E5 which relates to parents of high school students being informed about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements. These notifications are unclear in the student handbook although mention is made in the petition.

### E15 - Low

In 2019 less than 90% of students participated in SBAC.

## Best Practices

- E5: Clarify the credit transfer information in the student/parent handbook or via other methods to the appropriate students and their parents.
- E15: Develop and implement a plan to support and encourage all eligible students to participate in the ELA and Math portions of state testing.
- E16: Develop and implement a plan to support all student subgroups in meeting or exceeding the DASS school requirements for performance on the ELA and Math portions of state testing.
- E27: Charter school exceeds the diversity demographic of the local or authorizing school district.

Assigned District Staff Person: Lindsey Reese  
 Position of Assigned Staff Person: Area Superintendent

**DIEGO HILLS CENTRAL - EDUCATIONAL PROGRAM AND STUDENT SERVICES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Educational Program - Diego Hills</u></b>					
E1	Charter school curricular and instructional plan complies with approved charter.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence	<u>Yes</u>	<u>No</u>	
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E3	Charter school staffing complies with approved charter.	X Approved charter X Staffing chart	<u>Yes</u>	<u>No</u>	Staffing chart appears sufficient
E4	Charter school staffing is sufficient to carry out educational program.	X Staffing chart • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E5	If applicable, parents of high school students are informed about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements.	X Student handbook	<u>Yes</u>	<u>Low</u>	Addressed in petition; could not find in handbook. School is WASC accredited

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E6	Charter school has obtained WASC accreditation, if applicable.	X WASC accreditation	<u>Yes</u>	<u>No</u>	Accreditation seal appears on the website letter confirming acc. good thru 6/30/22
<b><u>Services to Special Populations</u></b>					
E7	Charter school follows process for identification and reclassification of students who are English Learners.	X Student handbook • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Addressed in petition - have requested roster Roster provided.1-22-21
E8	If charter school graduates students, it has notified students in foster care, homeless students, and students of a military family or with migrant status of their rights of exemption from local graduation requirements.	X Student handbook • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	In handbook
E9	Charter school policies and practices ensure referral and assessment of students suspected of needing accommodations under Section 504.	X Student handbook X Charter policies and procedures manual X CALPADS reports for Fall 1 submission • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	In handbook
E10	Students identified as eligible under Section 504 receive accommodations and supports required by their 504 plans.	X Sample 504 plans • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Sample provided

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Curricular Materials</u></b>					
E11	Charter school uses standards-aligned instructional materials.	X Description of courses, instructional framework, and/or scope and sequence <ul style="list-style-type: none"> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	Many options available
E12	Charter school uses instructional materials that address the specific needs of English Learners.	X Description of courses, instructional framework, and/or scope and sequence <ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	Addressed in petition. Handbook states that each student has Individual English Language Development Plan (IELDP) but no ELD courses are listed in the course catalog for high school  1-22-21 - materials provided for ELD instruction
E13	Charter school provides integrated English Language Development within regular classes in all content areas in a manner that is aligned with state content and ELD standards.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	Handbook confirms this but difficult to confirm based on curricular material used. Have requested an example for evidence  1-22-21 - evidence provided
E14	Charter school provides designated English Language Development for a specific protected time during the school day that is aligned with ELD standards.	X Class schedule <ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• Classroom observations</li> </ul>	<u>Yes</u>	<u>No</u>	Difficult to assess in IS setting  Documentation provided shows ELD instruction provided as appropriate to IS

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Assessment</u></b>					
E15	Charter school administers state-mandated testing according to testing rules and regulations as required for all K-12 schools in California.	<input checked="" type="checkbox"/> Assessment calendar <ul style="list-style-type: none"> <li>• <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>Low</u>	In 2019 less than 90% of students participated in SBAC
E16	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607.	<input checked="" type="checkbox"/> SBAC <input checked="" type="checkbox"/> Dashboard Data	<u>Yes</u>	<u>Low</u>	DASS School - not on track based on 2019 scores per ed code 47607
E17	Charter school has completed and timely posted a SARC containing required elements.	<input checked="" type="checkbox"/> SARC	<u>Yes</u>	<u>No</u>	2018-19 SARC is posted on SARC website CDE
E18	Charter school regularly collects student achievement data and reports it to parents and staff.	<input checked="" type="checkbox"/> Sample data reports to parents <input checked="" type="checkbox"/> Sample data reports to staff <ul style="list-style-type: none"> <li>• <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	
E19	Charter school provides required notifications of language proficiency assessments (ELPAC), including whether a child is a long-term English Learner or is at-risk of becoming one.	<input checked="" type="checkbox"/> Notifications/letters to parents <input checked="" type="checkbox"/> Home language surveys	<u>Yes</u>	<u>No</u>	Documentation provided



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E20	Charter school has a Learning Continuity Plan (2020-21 school year only). LCP has been presented to, reviewed, and approved by the Charter school’s Board.	X LCP X Minutes from Board meeting	<u>Yes</u>	<u>No</u>	Approved sept 2020
E21	Learning Continuity Plan addresses student academic performance across all student populations.	X Review of LCP	<u>Yes</u>	<u>No</u>	
E22	Title I funds/categorical funding are being used to supplement the school’s LCP goals.	<ul style="list-style-type: none"> <li>• LCP</li> <li>• Director of finance (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>N/A</u>	N/A no Title 1
E23	As applicable, the charter school has completed a School Plan for Student Achievement (SPSA) that meets federal school planning and stakeholder requirements for Title I for the 2020-21 school year.	<ul style="list-style-type: none"> <li>• SPSA</li> </ul>		<u>N/A</u>	N/A no Title 1
E24	The charter school has complied with the programmatic requirements for the development and implementation of a school site council (including composition, meetings, etc.) if it receives federal funding under Title I.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• School site council handbook</li> <li>• Membership lists</li> <li>• Meeting notices/agendas and minutes</li> </ul>		<u>N/A</u>	N/A no Title 1

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Admissions</u></b>					
E25	Charter school complies with the admissions practices described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>No</u>	Enrollment is ongoing. Lottery process is described in petition
E26	Admissions process for a student with an IEP is the same as for a student without an IEP.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	
E27	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	X Charter school student data X Student data from nearby school districts	<u>Yes</u>	<u>No</u>	EL population for charter is much higher than Dehesa. Serves high minority population
E28	Charter school enrollment forms indicate compliance with all applicable laws, including prohibition on collecting information regarding immigration status; prohibition on collecting social security numbers unless required by law; and, as required by Education Code section 49452.9(a), health care coverage options and enrollment assistance information.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	Enrollment forms provided

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E29	If charter school has used lottery system to determine which students will be allowed to enroll, process was held in the manner described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>No</u>	Description of process is provided but they have never used a lottery as enrollment is on-going
<b><u>Discipline</u></b>					
E30	Charter school discipline policies and practices are consistent with terms of charter.	X Approved charter X Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	
E31	Student discipline procedures comply with due process requirements set forth in Education Code section 47605, charter, and/or discipline policies and procedures, including all requirements for disciplining students with disabilities.	X Discipline policies and procedures, including policies regarding discipline of students with disabilities • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	
E32	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	X Discipline data X Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Health and Safety</u></b>					
E33	Charter School has and annually updates its school safety plan, addressing fire emergencies, earthquakes, criminal incidents, accidents, injuries, and other threats to the health and safety of students and staff, consistent with Education Code requirements.	X School safety plan	<u>Yes</u>	/ <u>No</u>	Includes updates for COVID-19
E34	Staff has been trained in health, safety, and emergency procedures, and appropriate first aid supplies are kept on hand.	X Training sign-in sheets • Observation of main office	<u>Yes</u>	<u>No</u>	
E35	Charter school has a policy/procedure for visitors to enter and leave campus.	X Policy or procedure	<u>Yes</u>	<u>No</u>	
E36	Charter school provides for the screening of pupils’ vision, hearing, screening for scoliosis, and required immunizations.	X Records of student screenings	<u>Yes</u>	<u>No</u>	Included in petition, records provided.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E37	If charter school serves students in grades 7-12, governing board has adopted Suicide Prevention Policy that was created in conjunction with stakeholders, specifically lists its high-risk groups, addresses the needs of those high-risk students, and was updated in the last 5 years.	X Suicide Prevention Policy X Board meeting minutes	<u>Yes</u>	<u>No</u>	
E38	If charter school qualifies for FRPL for all meals that it provides, it has applied to provide a universal meal service to all students at the school, or, if not, has submitted a governing board resolution to the state claiming a fiscal hardship (with evidence that those finding are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> <li>• Application for universal meal service</li> <li>• Board resolution</li> </ul>	<u>Yes</u>	<u>No</u>	While not required, meals are provided if students attend school for longer than 2 hours per day.
E39	Charter school provides at least one meal per day to students who qualify for FRPL, except as provided for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Executive director (or equivalent) interview</li> </ul>	<u>N/A</u>	<u>N/A</u>	Addressed in petition pg 65 (see above)
E40	Charter school posts on its website in a prominent, conspicuous location, the Title IX information, including the name and contact number/e-mail for the Title IX Coordinator for that school.	X Screenshot from website	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E41	If charter school serves students in grades 7-12, it provides comprehensive sexual health and HIV prevention education, as required by Education Code section 51930, et seq.	X Sexual health and HIV prevention education course description	<u>Yes</u>	<u>No</u>	
E42	Charter school has developed methods for informing parents/guardians of students in grades 6-12 regarding human trafficking prevention resources, as required by Education Code section 49381.	X Policy or other description of method for informing parents/guardians	<u>Yes</u>	<u>No</u>	
<b><u>Parent Notifications</u></b>					
E43	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	X Notice	<u>Yes</u>	<u>No</u>	
E44	If charter school serves students in 11th grade, parents of those students are notified by January 1st that the students will be deemed a Cal Grant applicant unless the student opts out, as required by Education Code section 69432.9(d)(1).	X Notice	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E45	If charter school serves students in 12th grade, parents of those students are notified of student’s GPA by October 1st, as required by Education Code section 69432.9(c)(2).	X Notice	<u>Yes</u>	<u>No</u>	Letter of explanation provided
E46	Charter school notifies parents at least twice a year regarding how to initiate access to available student mental health services on campus or in the community.	X Notice	<u>Yes</u>	<u>No</u>	
<b><u>Student Records</u></b>					
E47	Charter school maintains comprehensive records regarding its students.	X Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number	<u>Yes</u>	<u>No</u>	
E48	Charter school maintains student records, including special education records, in a confidential and secure location.	X Policy regarding confidentiality of student records • Observation of main office	<u>Yes</u>	<u>No</u>	Main Office not observed due to COVID-19
E49	Charter school has a policy or procedure for parents to review student files, including a log.	X Policy regarding review of records	<u>Yes</u>	<u>No</u>	
E50	Charter school has policy or procedure regarding release of student information.	X Policy regarding release of student information	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E51	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Verification provided



# Diego Hills Central: Special Education

## Context

Diego Hills Central Public Charter School (DHCPCS) is authorized by the Dehesa School District but is its own independent local education agency (LEA) member of the El Dorado Charter Special Education Local Planning Area (SELPA) for special education purposes and is solely responsible for implementing all state and federal special education requirements and for complying with all applicable laws and regulations pertaining to students with disabilities and in accordance with Education code Section 47641(a). The MOU between DHCPCS and Dehesa School District was approved on August 17, 2017 and will end on June 30, 2022.

Diego Hills is a general education independent study program offering a personalized learning approach. Special education supports and services are provided based on a student's Individualized Education Program (IEP). Both formal and informal assessment measures are utilized to measure and monitor student progress and assist in making data driven decisions related to instruction, goals and services. Students enrolled at Diego Hills have the option to receive their special education services online or in person at their resource center. Services are provided one on one or within a small group setting, depending on student needs. Students, staff and parents work together to develop a personalized learning experience.

The enrollment process for students with disabilities follows the same process as general education students, however, additional steps are outlined within the DHCPCS special education procedure manual, as well as the El Dorado Charter SELPA policies in order to comply with the requirements of the Individuals with Disabilities Education Act (IDEA). Upon initial enrollment, the IEP is reviewed by the special education director or coordinator to ensure appropriate services are provided. The team then reviews the IEP and student performance within the first 30 days (30-day interim) to make adjustments to the IEP or recommendations as needed.

The DHCPCS manual also outlines a clear referral process and tiered system of support when the general education team suspects a disability. DHCPCS has a multidisciplinary student study team (SST) and uses a multi-tiered approach to interventions. The SST team consists of general education teachers, student success managers and parents.

Students identified as eligible for special education services have access to the full range of services as indicated by their IEP. The sampling of IEP's submitted for review demonstrate that all required members of the IEP team were present and participated in the meeting. DHCPCS and SELPA policies indicate clear timelines in accordance with the Individuals with IDEA and the California Department of Education (CDE). Based on last year's recommendations, service providers within DHCPCS now utilize the Service Tracker tool within the SEIS IEP system to track service delivery.

According to the California Dashboard data from 2020, DHCPCS does not enroll a disproportionate number of students with disabilities compared to that of the state average. The CA Dashboard 2020 data indicate an enrollment of 703, with 118 students eligible for an IEP. This is a special education identification rate of 16.8%, which is a bit higher than the 2020 state average of 11.7%. Discipline data from 2018-2019 (most recent available due to Covid), data provided indicate that there were no suspensions for students with disabilities. There is no change to the CPA State Accountability data for 2019-2020. Due to COVID-19, all state assessments were suspended, and measures continue to be taken from 2018-2019 data.

## Compliance Area Concerns

- There are no areas of concern.

## Best Practices

- Continue to ensure that special education policies and procedures are clearly outlined and implemented.
- Continue to utilize the Service Tracker tool available within SEIS to ensure accountability for service provision.

Assigned District Staff Persons: Lindsey Reese, Connie Pettit,  
 Position of Assigned Staff Persons: Area Superintendent, SpEd Director

**DIEGO HILLS CENTRAL - SPECIAL EDUCATION OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Special Education Program</u></b>					
S1	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	SELPA policies and procedural manual indicate policies for providing the full continuum of special education services
S2	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	SELPA policies and procedural manual indicate policies and procedures for handling referrals for special education as well as completing assessments
S3	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	SELPA policies and procedural manual identify timelines for completing assessments, holding meetings and responding to parent requests

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
S4	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> <li>X Sample IEPs</li> <li>X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Clear enrollment process for students with IEP’s, SEIS Tracker service logs
S5	All required members of IEP teams attend IEP meetings.	<ul style="list-style-type: none"> <li>• Sample IEPs</li> </ul>	<u>Yes</u>	<u>No</u>	IEP meeting notes, signature page include required team members
S6	Charter school does not enroll a disproportionately small number of students with disabilities.	<ul style="list-style-type: none"> <li>• Data demonstrating percentage of students with disabilities in charter school</li> </ul>	<u>Yes</u>	<u>No</u>	2020 DHC dashboard data- 16.8%
S7	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	<ul style="list-style-type: none"> <li>• Director of finance (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	School administrators are responsible for 504 plans, ordering materials, equipment to ensure funds are taken from student services and not sped.
S8	Board and charter school administration are aware of and familiar with the terms of the special education MOU between the District and the charter school.	<ul style="list-style-type: none"> <li>X Special Education MOU</li> <li>• Review of agenda and minutes</li> <li>• Board President interview</li> </ul>	<u>Yes</u>	<u>No</u>	Renegotiated MOUs started July 1, 2020.
S9	Charter school has fulfilled its obligations under the MOU, including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>• Records of authorizer</li> </ul>	<u>Yes</u>	<u>No</u>	

## **Diego Hills Central: Facilities/Operations**

### **Context**

Part of the Learn 4 Life network of charter high schools, Diego Hills Central is now located in a remodeled grocery store in a strip mall at 4348 54<sup>th</sup> St, San Diego CA 92115. It is a single resource center/independent study school serving approximately 400 students, and is beginning to also serve grades K – 8. Adjustments to the precautions related to the COVID-19 pandemic did reduce the number of students at the site, but they have continued to provide on-site learning by appointment.

### **Compliance Area Concerns**

- There are no current Compliant Area Concerns.

### **Best Practices**

- Prepare to address renewal and/or reauthorization in 2022.

Assigned District Staff Person: Lindsay Reese/Jessica Flaven  
 Position of Assigned Staff Person: Superintendent/Project Manager

**DIEGO HILLS CENTRAL - OPERATIONS AND FACILITIES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Maintenance of Facilities</u></b>					
O1	A designated person is responsible for overseeing operations and facilities management.	X Staff organizational chart	<u>Yes</u>	<u>No</u>	Included in Area Superintendent duties
O2	Facilities are adequate for number of students and types of programs.	X Capacity chart for campus facilities X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
O3	Charter school has process for routine inspections of grounds to ensure that they remain in good condition and free from mold and other hazardous substances.	X Inspection logs X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Legal Compliance</u></b>					
O4	All facilities meet Americans with Disabilities Act requirements.	X ADA certification	<u>Yes</u>	<u>No</u>	The certification statement from the architect meets this requirement.
O5	All single-user restrooms have been designated as all-gender restrooms.	X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	Pictures were submitted

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O6	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	X Asbestos Management Plan	<u>Yes</u>	<u>No</u>	
O7	Charter school has certificate of occupancy on file.	X Certificate of occupancy	<u>Yes</u>	<u>No</u>	
O8	Charter school has conditional use permit on file, as applicable.	X Conditional use permit	<u>Yes</u>	<u>No</u>	
O9	Charter school has safety inspection by local fire department on file.	X Safety inspection by local fire department	<u>Yes</u>	<u>No</u>	
O10	If charter school participates in an interscholastic athletic program, it has a written emergency action plan and at least one automated external defibrillator for the school.	X Emergency action plan X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
O11	If charter school serves any grades 6-12, and meets the 40% pupil poverty rate, it provides feminine hygiene products, including tampons and sanitary napkins, in a least 50% of the school’s restrooms.	X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>  <u>[Indicate N/A if applicable.]</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O12	If charter school is aware of a lactating pupil, it has made accommodations for lactation other than a restroom and has provided a place to safely store milk.	X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
O13	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	X Certificates of insurance	<u>Yes</u>	<u>No</u>	
O14	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1, as recently amended by Assembly Bill 1507.	X Operations manager (or equivalent) interview X Designation of any charter facilities (e.g., resource centers, etc.) X Review of addresses of facilities	<u>Yes</u>	No	Litigation ended in favor of DHC, appeal was denied,  Through AB1507 possibility of extending through 2022 renewal or reauthorization.
O15	Charter school has identified all facilities and their respective locations, including those that are available for use by students enrolled in the charter school for any purpose related to the charter school’s educational program (whether or not such facility(ies) is/are owned, leased, rented, or subleased by the charter school or a different entity).	X List of facilities X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>  <u>[Indicate N/A if applicable.]</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O16	Charter school has not added or begun using any new or different facilities that are not identified in the most recent charter petition or material revision (as applicable) approved by the District’s governing board.	<input checked="" type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview <input type="checkbox"/> Authorizer records	<u>Yes</u>	<u>No</u>	



# **Dehesa Charter Oversight Report**

**Cabrillo Point  
Academy**

# Cabrillo Point Academy: Governance

## Context

Cabrillo Point Academy is a California public benefit corporation (founded in 2017 as Inspire Charter School – South) and is exempt from federal tax under Section 501(c)(3) of the Internal Revenue Code. It is governed by a 5 member governing board (maximum number) and is led by a Principal (although other documents name Executive Director or Senior Director as head of school). The school was previously part of the Inspire (renamed Provenance, then ThinkSuite) charter school network but has made substantial progress toward becoming fully independent of the network in the past two years. It is implementing a “wind down” plan to substantially reduce its dependence on Provenance/ThinkSuite.

## Compliance Area Concerns

Since the 2019-2020 charter review, the school has continued to advance toward becoming independent of the Provenance network. That work has including substantial board development, including new members, governance training, and engaging the board in leader evaluation. Bylaws have been updated and several important policies have been developed or updated. Board documents are well-organized, with transparency assured through school website. No areas of “high” concern were noted in this year’s review. The following “low” level concerns were noted:

- Titles for school leaders are inconsistent in documents and school website. Could use a job description specific to staff member/s with tasks supporting the outside “back office” provider’s finance function.
- Mechanisms for parent participation in governance and decision-making are not at the level anticipated by the charter. The scheduling of board meetings for the middle of a weekday may further reduce opportunities for parent/community engagement, although with homeschool parents this is perhaps less of a concern than with other schools. The board should consider strategies to encourage parent/community participation in governance as pandemic conditions recede.
- General parent organization (or PTO referenced in charter) not currently active and other mechanisms for engaging parents in governance and decision-making not readily apparent. However, DELAC has been established with parent participation
- Although complaint policies and procedures are in place, unable to find a basic complaint form (or “how to”) for addressing an issue with school administration or board.

## Best Practices

The following suggested changes in governance may support the school’s further improvement:

- At or before time of next charter renewal, charter document should be updated to reflect changes made to governance, organizational structure and operations as part of the separation from Inspire/Provenance.
- Virtual meetings may create an opportunity for parents to participate who would not otherwise be able to attend in person, so the board may wish to consider continuing this format after public meetings are allowed to resume.
- Getting the size and composition of the governing board “just right” can be a difficult balancing act: valuing continuity while recognizing that the school’s needs will change over time. Given the small size of the board, there may be some benefit to developing a matrix of board member knowledge and skills that would best serve the organization as it grows and evolves.

Assigned District Staff Person: Jenna Lorge and Caroline Moon  
 Position of Assigned Staff Person: Senior Director, and Board President

**CABRILLO POINT ACADEMY - GOVERNANCE OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Organizational Management</u></b>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<ul style="list-style-type: none"> <li>× Articles of Incorporation</li> <li>× Bylaws</li> </ul>	<u>Yes</u>	<u>No</u>	Articles of Incorporation and bylaws are posted on the school’s website (Accountability & SARC tab). (In an extensive on-line collection of policies, was unable to find one foundational document: the charter.)
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<ul style="list-style-type: none"> <li>× Bylaws</li> </ul>	<u>Y</u>	<u>No</u>	Key bylaws components present; amended June 2020; reviewed/revised/approved by board at June 16, 2020 meeting.
G3	Any changes to charter or bylaws have been approved by charter school’s governing board and submitted to the authorizer.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Changes made were approved by the governing board and submitted to the authorizer.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u> <u>High / Low /</u> <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G4	Charter school has an organizational chart and job descriptions that delineate clear separation of duties and responsibilities.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Organizational chart</li> <li>× Job descriptions CEO/CBO</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>Low</u>	School leader job description provided as for Senior Director and seems to pre-date the break with Provenance. The organization chart puts an Executive Director at the head. CBO description provided was management and accounting services agreement. Job description for individual who acts as primary liaison with service provider would be useful.
G5	Governing board has a robust, outcomes-based process for evaluating the charter school leader.	<ul style="list-style-type: none"> <li>× Most recent charter school leader evaluation</li> <li>× Board president interview</li> </ul>	<u>Y</u>	<u>No</u>	Process provided was for Senior Director, evaluation criteria are robust and include school goals.
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter <ul style="list-style-type: none"> <li>• Executive director (or equivalent) interview</li> </ul> </li> <li>× Teacher interview</li> <li>× Information available on charter school’s website</li> </ul>	<u>Y</u>	<u>Low</u>	Board meetings are held mid-day during the week (usually 1 p.m. with some special meetings in the morning), which may be difficult for parents and community. Of 20 meeting minutes reviewed, only 3 had any public comment recorded. School has an advisory group for English learner program but not for general population. (Charter referenced PTO.)

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Composition</u></b>					
G7	Charter school has a list or roster of governing board members that is publicly accessible.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Information is available on charter school’s website</li> </ul>	<u>Y</u>	<u>No</u>	
G8	Composition of governing board is consistent with approved charter.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Bylaws and charter do not contain board qualifications other than that one member shall be a parent of a current student. Currently, 2 members are parents of CPA students.
G9	Governing board is diverse and reflects charter school and community population.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Description of school and community demographics</li> </ul>	<u>Y</u>	<u>No</u>	Board is reasonably representative.
G10	Governing board members have relevant knowledge and experience in key areas, such as education, finance, legal, real estate, and fundraising.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Information posted on charter school’s website</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	Board members have relevant knowledge and experience and, based on observation and review of minutes, appear to be both prepared and engaged in the issues before them. Less discussion of financial issues than expected, however.
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Completed Form 700s</li> <li>× Completed Form 990s</li> <li>× Agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	No apparent conflicts of interest.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Meetings</u></b>					
G12	Governing board conducts meetings as frequently as is needed to ensure that it addresses necessary charter school business, and such meetings are consistent with timelines set forth in charter and bylaws.	<ul style="list-style-type: none"> <li>× Annual governing board meeting calendar</li> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Board meets monthly, but had many special meetings during the past year. (An unprecedented year, particularly for this school.)
G13	Governing board members receive annual training regarding Brown Act requirements.	<ul style="list-style-type: none"> <li>× Sign-in sheet from Brown Act training</li> <li>× Copy of materials (e.g., Power Point slides)</li> </ul>	<u>Y</u>	<u>No</u>	Thorough plan for board training and development.
G14	Meetings are noticed and conducted in accordance with the Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of accessibility of meeting (location, online participation, public comment time, etc.)</li> <li>× Screenshot of charter school website</li> </ul>	<u>Y</u>	<u>No</u>	Agendas compliant although item descriptions are minimal. Observed meeting conducted in accordance with Brown Act.
G15	Discussion during Board meetings is limited to properly-noticed items on agenda.	<ul style="list-style-type: none"> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	No non-agendized discussion at observed meeting.
G16	Board use of closed session during noticed meetings is consistent with Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	Closed session properly noticed for observed meeting and on other agendas; “report outs” were sufficient.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G17	Meeting agendas include sufficiently-detailed items of business to be transacted and any necessary action to be taken by the Board.	× Sample meeting agendas	<u>Y</u>	<u>No</u>	Agendas descriptions are minimal, but sufficient. If parent/public participation increases, more description of items could help avoid confusion.
G18	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	× Sample meeting agendas × Public comment policy	<u>Y</u>	<u>No</u>	Complete public comment notice on agenda.
G19	Board members solicit and provide and/or solicit input from the community served.	× Board biographies × Advisory committee/PTO documents × Board President interview	<u>Y</u>	<u>Low</u>	Challenges in establishing structure for parent engagement in governance and decision-making, but parents participated in some meetings. DELAC has been established with 3 parent representatives.
G20	Minutes are approved and thereafter made available to the public.	× Sample meeting minutes × Screenshot of charter school website	<u>Y</u>	<u>No</u>	Minutes approved at subsequent regular meeting.
G21	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	× Board meeting minutes	<u>Y</u>	<u>No</u>	

**Board Policies** [Note: The oversight team lead may request additional policies for review that are not listed here.]

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G22	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<ul style="list-style-type: none"> <li>× Parent handbook</li> <li>× Student handbook</li> <li>× Employee handbook</li> </ul>	<u>Y</u>	<u>No</u>	Employee handbook update approved September 24, 2020; parent/student handbook update approved July 30, 2020.
G23	Governing board has adopted policies related to conflict of interest, which align with the requirements of Education Code section 47604.1.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	Conflict code in place. Board received conflicts training from school’s attorney.
G24	Governing board has adopted/updated policies related to student discipline and due process.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	Suspension/expulsion policy tracks Education Code. (Policy undated but approved May 2020. Other policies also undated as posted on website.)
G25	Governing board has adopted/updated policies related to complaints and investigations.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	UCP adopted September 2020; updated December 2020.
G26	Governing board has adopted/updated internal control policies (and related forms and systems).	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	
G27	Governing board has adopted/updated policies related to bank signature authorizations.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G28	Governing board has adopted/updated policies related to allowable purchases and purchasing authority.	× Board policies	<u>Y</u>	<u>No</u>	
G29	Governing board has adopted/updated policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	× Board policies	<u>Y</u>	<u>No</u>	
G30	Governing board has adopted/updated policies related to employee harassment.	× Board policies	<u>Y</u>	<u>No</u>	
G31	Governing board has adopted and annually updates its safety plan by March 1 <sup>st</sup> to include all legal requirements applicable to charter schools.	× Board policies × Meeting agenda and minutes reflecting annual review and update	<u>Y</u>	<u>No</u>	Safety plan updated March 2021; COVID operations report adopted June 2020.
G32	Governing board has adopted policies related to immunization records and administration of medication.	× Board policies	<u>Y</u>	<u>No</u>	
G33	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	× Board policies	<u>Y</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G34	Governing board has adopted policies related to Section 504/IDEA compliance.	× Board policies	<u>Y</u>	<u>No</u>	
<b>Education Code Assurances [Note: As part of the review, the oversight team lead will evaluate whether such assurances are consistent with the charter school’s actual operations, based on available information. “Submitted” in this context means some information was available for review, although a full audit was not conducted.]</b>					
G35	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	× Policy review • Executive director (or equivalent) interview × Review of any complaints	<u>Y</u>	<u>No</u>	No evidence of non-compliance
G36	Charter school has complied with assurance that it shall not charge tuition.	× Policy review • Executive director (or equivalent) interview	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G37	Charter school has complied with assurance that it shall not discriminate against any pupil on the basis of the characteristics listed in Education Code section 220.	× Policy review • Executive director (or equivalent) interview × Review of any complaints × Review of recruitment and admissions materials	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G38	Charter school has complied with assurance that it shall admit all students who reside in California who wish to attend (up to the Charter School’s capacity based upon space, staff, or Charter School policy).	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of student demographics and enrollment data</li> <li>× Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G39	Charter school has complied with assurance that it shall determine by public random drawing, which students, other than those already enrolled, will be allowed to enroll if the number of pupils who wish to attend charter school exceeds charter school’s capacity and make reasonable efforts to accommodate the growth of charter school.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G40	Charter school has complied with assurance that it shall comply with EC 47605(d)(2) in regard to the establishment of preferences for enrollment which shall not result in limiting enrollment access for pupils with: disabilities, academically low-achieving pupils, English Learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged or pupils based on nationality, race, ethnicity, or sexual orientation.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G41	Charter school has complied with assurance that it shall notify the school district of residence of the pupil’s last known address within 30 days if a pupil is expelled or leaves charter school without graduating or completing the school year for any reason	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>N</u>	<u>No</u>	Dehesa has received none; school states that it does send them and provided a sample.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Memorandum of Understanding</u></b>					
G42	Board and charter school administration are aware of and familiar with the terms of any approved MOUs or agreements between the District and the charter school.	<ul style="list-style-type: none"> <li>× Memoranda of understanding</li> <li>× Review of agenda and minutes</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	Operational and Special Education MOUs approved by board in December 2020. Per minutes, some discussion of contents took place.
G43	Charter school has fulfilled its obligations under the MOU(s), including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Compliant with MOU in governance-related areas.
G44	Charter school responds promptly to authorizer inquiries.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.
G45	Charter school informs authorizer in advance of any proposed material changes to program or operations.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Complaint Policies and Procedures</u></b>					
G46	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom, as applicable, and website.	<ul style="list-style-type: none"> <li>× Board policies</li> <li>× Review of student/parent and staff handbooks</li> <li>• Observation of classrooms</li> <li>× Observation of website</li> </ul>	<u>N</u>	<u>Low</u>	Complaint form found in Resources section of website is CDE template designed for complaint to authorizer. Unable to find a form for complaint to school. No complaint form in policy on website or in handbook, although both cover complaint process. On-site postings addressed in other portions of review.
G47	Complaint policies and procedures are available in the main/front office or website for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Observation of main office / website</li> </ul>	<u>Y</u>	<u>No</u>	On-site postings addressed in other portions of review.
G48	Complaints are handled in a manner that is consistent with the charter school’s policies and procedures, and there is no apparent bias or conflicts of interest.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Board President interview</li> <li>× School leader interview</li> </ul>	<u>Y</u>	<u>No</u>	No complaints referenced in board agenda; no evidence to evaluate process.
G49	Charter school has policies that allow for student, parent, and staff complaints to be appealed to the charter school’s Board.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Review of website</li> <li>× Review of student/parent and staff handbooks</li> </ul>	<u>Y</u>	<u>No</u>	UCP includes option of appeal to the board. No policy found on non-UCP complaints.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G50	Charter school has policies for student disciplinary actions that include appropriate due process.	<ul style="list-style-type: none"> <li>× Review of charter</li> <li>× Review of policies</li> <li>× Review of student/parent handbook</li> </ul>	<u>Y</u>	<u>No</u>	
G51	Charter school leadership discloses and ensures Board is fully informed of any anticipated or pending litigation.	<ul style="list-style-type: none"> <li>× Board President interview</li> <li>× School leader interview</li> <li>× Review of agendas</li> </ul>	<u>Y</u>	<u>No</u>	Multiple closed session items and updates on agenda.
<b><u>Planning</u></b>					
G52	Board adopted a Learning Continuity Plan (2020-21 school year only) by September 30, 2020, which was submitted to the authorizer and San Diego County Office of Education.	<ul style="list-style-type: none"> <li>× Review of LCP</li> <li>× Authorizer records</li> </ul>	<u>Y</u>	<u>No</u>	LCP was adopted and submitted.
G53	Board held a public hearing for review and comment for both the Learning Continuity Plan and budget overview for parents/guardians.	<ul style="list-style-type: none"> <li>× Sample agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	Public hearing held for LCP and budget overview.

# Cabrillo Point Academy: Finance/Business Summary

## Context

Cabrillo Point Academy Charter School provides the education for a projected enrollment of approximately 4,600 students. Due to “Hold Harmless” legislation for the year, the school receives funding from the state based on its prior year’s ADA levels. Per the school’s 2<sup>nd</sup> Interim Report, the Ending Fund Balance for FY 2020-2021 is projected to be \$3.7M, or 7.8% of its projected \$46.0M total projected revenues. The operational balance for FY 2020-2021 projects a yearly Ending Balance of \$885,715. For the 2020-2021 School Year, Cabrillo Point Academy made significant strides in disassociating itself from its reliance on Provenance as an outside vendor to provide many of the school administrative services. Many services previously provided by Provenance in years past were “pulled back” and performed in-house by the school for the current FY 2020-2021 year. The school plans on being fully independent from any services being provided by Provenance for the 2021-22 School Year. Interviews and discussions were held with the Sr. Director and lead staff of the school’s business/finance outside vendor.

## Compliance Area Concerns

- No Audit findings were noted from the school’s recently completed Audit Report
- Issue related to prior years’ loans and interfund transfers is source of continuing dispute with Inspire/Provenance/ThinkSuite and the school. Approximate dollar amount in dispute between the school and Provenance is \$2.0M. For several months, the school and Provenance have conducted negotiations on resolving the dispute with no success to date. As of this reporting date, no adjustments to the school’s Balance Sheet for its receivables due from Provenance have been included in projections. School is in an existing Services Agreement with Provenance for Administrative Services through June 30, 2021.

## Best Practices

- The current year Shared Administrative Staff Agreement between Pacific Coast Academy and Mission Vista Charter schools is well done, a creative sharing of administrative tasks and reconcilable via an approved matrix of staff and related payroll. No Leased Teacher/Staff agreement or MOU exists in the current year for the school. The school previously operated under a leased teacher MOU agreement between 14 charter schools in prior years. Allowing for the Leased Teacher MOU to expire and for the school to fully employ the “Teachers of Record” has eliminated a significant amount of confusion in managing staff as well as reducing fiscal transfers back and forth between schools. Prior year review and fiscal reconciliation via the Leased Teacher process was virtually impossible. All “teachers of record” supporting the school’s students in the current year are employed by the school. This is a significant improvement for the school in managing its staffing and payroll.
- A positive offset to any potential negative impact of the dispute noted above, is the school not yet including funding per SB 86 and ESSR II & III related to Stimulus Funding due to COVID-19 Pandemic. These funds should bolster the school’s overall financial position when included in its financial projections. At the time of the report, clarity regarding the actual receipt and reporting required for receipt of the stimulus funds was not resolved and not included in any current fiscal projections.
- Recommend school formally **revise its Fiscal Policies** noting whenever interfund transfers or loans to other schools or entities are proposed, School Board approval be required via a Board Resolution.
- Continued pursuit of conversion to new vendor for purchasing Enrichment Ordering System.



Assigned District Staff Person: Tyler Myers, CX; Erica Vanderspeck, Serena Barnett, Jenna Lorge,

Position of Assigned Staff Person: Director of Client Finance for Charter Impact, Senior Assistant Director, Director of Accounting, Executive Director

**CABRILLO POINT ACADEMY - FISCAL AND BUSINESS SYSTEMS OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Budget, Accounting, and Financial Reporting</u></b>					
<u>F1</u>	Governing board policies address budget, accounting, and financial reporting.	X Board policies	<u>Yes</u>	<u>No</u>	Evidence provided. Board meeting held in August 2020 provided a Board Budget/Finance workshop for Board Members.
<u>F2</u>	Current budget has been approved by the governing board.	X Current/adopted budget X Board meeting minutes	<u>Yes</u>	<u>No</u>	
<u>F3</u>	Charter school has clear process for reviewing and revising the budget (e.g., in light of changes in student enrollment or operations), including governing board approval.	X Board meeting minutes, Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Each month the Board reviews monthly budget updates at regularly scheduled meetings. In addition, the Board formally approves the school’s Adopted Budget, 1 <sup>st</sup> Interim and 2 <sup>nd</sup> Interim reports during the school year.
<u>F4</u>	Charter school’s Learning Continuity Plan aligns with LCFF Calculator (applicable to 2020-21 school year only).	X Learning Continuity Plan X LCFF Calculator	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F5</u>	Budget provides for all financial obligations.	X Current budget (2 <sup>nd</sup> Interim Report, Balance Sheet)	<u>Yes</u>	High	Current budget provides for all financial obligations. However, prior year monies via receivables in Balance Sheet owed to the school is in dispute, still outstanding and unresolved after several months of negotiations/discussions. The disputed amount of monies owed the school from Inspire/Provenance/ThinkSuite is approximately \$2M.
<u>F6</u>	Governing board approves all required financial reports.	X Required financial reports X Board meeting minutes	<u>Yes</u>	<u>No</u>	
<u>F7</u>	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F8</u>	On or before December 15th, the charter school submits the interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F9</u>	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F10</u>	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	X Proof of submission	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F11</u>	Charter school maintains separate accounts for restricted revenues and expenditures.	X Financial records. Alt SACS reporting	<u>Yes</u>	<u>No</u>	
<u>F12</u>	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports	<u>Yes</u>	<u>No</u>	Evidence provided. Formal review of cash flow projections occur minimally three times a year during Adopted Budget, 1 <sup>st</sup> Interim and 2 <sup>nd</sup> Interim reporting
<u>F13</u>	Charter school’s business accounting system complies with state accounting and reporting requirements.	X Director of finance (or equivalent) interview. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports	<u>Yes</u>	<u>No /</u>	Accounting system complies to state reporting requirements
<b><u>Audit</u></b>					
<u>F14</u>	Charter school has selected a state-approved auditing firm, and annually submits independent auditor selection certification and contract to authorizer and county office of education by March 31st.	X Proof of submission of auditor certification and contract X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F15</u>	Charter school has developed auditing schedule/timeline.	X Auditing schedule/timeline	<u>Yes</u>	<u>No</u>	
<u>F16</u>	Charter school has submitted prior year’s financial audit to authorizer.	X Previous year’s audit X Proof of submission	<u>Yes</u>	<u>No</u>	Evidence provided. Report submittal deadline delayed to March 2021 due to State Auditor’s change to its guidelines

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F17</u>	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	Not Applicable. No Audit Findings	<u>Yes</u>	<u>N/A</u>	No Audit Findings in Audit Report
<b><u>Financial Condition</u></b>					
<u>F18</u>	Charter school maintains an appropriate level of reserves for economic uncertainties.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Yes. School projects an Ending Balance for FY 2020-21 of \$3.74M which represents 7.8% of its total revenues projected for the year of \$46.0M
<u>F19</u>	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	X Financial records. MYP reports during Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports XD irector of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Formal three-year financial projections submitted during Adopted Budget, 1 <sup>st</sup> and 2 <sup>nd</sup> Interim provide evidence of reasonable assumptions

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F20</u>	Based on the projections, charter school will be able to meet its financial obligations and maintain an appropriate level of reserves in the current and two subsequent fiscal years.	X Financial records, Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>Low</u>	Based on its projections, the school will be able to meet its financial obligations with appropriate level of reserves in current and two future years. However, significant impact on school’s Balance Sheet is a concern due to the current dispute with Inspire/Provenance/ThinkSuite, regarding amount owed school. Current Balance Sheet figures do not yet included any adjustments for dispute while resolution on going. A positive offset to any potential negative impact of dispute is the school as yet has not included funding per SB 86 and ESSR II & III related to Stimulus Funding due to COVID-19 Pandemic. These funds should bolster the school’s overall financial position when included in its financial projections.
<b><u>Cash Receipts</u></b>					
<u>F21</u>	Charter school has policies addressing cash receipts.	X Cash receipt policy	<u>Yes</u>	<u>No</u>	
<u>F22</u>	Charter school maintains records of all monies received (e.g., issues receipts).	X Cash receipt policy X Sample records of cash receipts X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F23</u>	Charter school deposits monies in a timely manner.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F24</u>	Charter school maintains records of deposits of all monies.	X Cash receipt policy X Sample records of cash deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F25</u>	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F26</u>	Charter school’s board has adopted a resolution or formally approved any interfund transfers via the due to/due from process, which details all material facts related to such transfers.	X Board-adopted resolution and/or meeting minutes evidencing formal approval of interfund transfer(s).	<u>Yes</u>	<u>Low</u>	School has not experienced any interfund transfers this fiscal year. Issue related to prior year loans and interfund transfers is source of continuing dispute with Inspire/Provenance/ThinkSuite on monies owed the school. Recommend school formally <b>revise its Fiscal Policies</b> noting whenever interfund transfers or loans to other schools or entities are proposed, School Board approval be required via a Board Resolution.
<b><u>Disbursements</u></b>					
<u>F27</u>	Charter school has policies addressing disbursements.	X Disbursement policy	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F28</u>	Disbursements require all of the following: (1) an original invoice from the vendor; (2) a receiving document; (3) appropriate approval of the purchase; and (4) ratification by the governing board, if amount exceeds maximum dollar amount set forth in charter school policy.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F29</u>	Checks are signed by authorized employees.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F30</u>	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F31</u>	Charter school has segregated duties between purchasing, receiving, and accounts payable.	X Staff organizational chart X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Payroll</u></b>					
<u>F32</u>	Charter school has a salary schedule or other satisfactory salary structure.	X Salary schedule	<u>Yes</u>	<u>No</u>	
<u>F33</u>	Tax deposits are completed in a timely manner.	X Proof of tax deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F34</u>	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	X Proof of recording of earnings X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F35</u>	Charter school has system to provide STRS data to authorizer.	X Proof of submission of STRS data X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F36</u>	Charter school has system to maintain employee earning records for preparation of W-2s.	<input type="checkbox"/> Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F37</u>	Charter school adheres to provisions of any leased teacher/staff agreement or MOU, including invoicing for every leased teacher/staff member and Board approval of same.	X Prior year Leased Teacher/Staff Agreement X Evidence of Board approval of new Shared Admin Staff Agreement X No invoices required this year to date	Yes	<u>Low</u>	No Leased Teacher/Staff agreement or MOU exists for the current year. The school previously operated under a leased teacher MOU agreement between 14 charter schools in prior years. That agreement/MOU has expired. All “teachers of record” supporting the school’s students are employed by the school for FY 2020-21. This is a significant improvement for the school in regards to managing staffing and payroll. The school has implemented a Shared Admin Staff Agreement or MOU with two other Charter Schools for the current year administrative efforts. The current year Shared Admins Staff Agreement is well done, creative and reconcilable via an approved matrix of staff and related payroll.
<b><u>Equipment Inventory</u></b>					
<u>F38</u>	Charter school has policies addressing the purchase and maintenance of equipment.	X Equipment purchase and maintenance policy	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F39</u>	Charter school maintains an equipment inventory that is physically located on each site.	X Equipment inventory	<u>Yes</u>	<u>No</u>	
<u>F40</u>	Equipment purchased with federal funds is properly identified.	X Director of finance (or equivalent) interview. Alt SACS reporting	<u>Yes</u>	<u>No</u>	
<b><u>Student Attendance (All Schools)</u></b>					
<u>F41</u>	Charter school uses a generally approved attendance accounting system.	X Screenshot of attendance accounting system	<u>Yes</u>	<u>No</u>	
<u>F42</u>	There is a designated staff person responsible for administering attendance.	X Staff organizational chart, Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F43</u>	Charter school calendar includes a minimum of 175 instructional days.	X School calendar	<u>Yes</u>	<u>No</u>	
<u>F44</u>	Charter school class/bell schedule ensures minimum instructional minutes (36,000 for K, 50,400 for 1st - 3rd, 5400 for 4th - 8th, 64,800 for 9th - 12th).	X Class/bell schedule	<u>Yes</u>	<u>No</u>	
<u>F45</u>	Student absences are excluded from apportionment days.	X Attendance reports, student work samples, registers X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u> <u>Yes / No</u>	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
F46	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	X Attendance reports, DCOT HR Lead interview X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
F47	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	X Proof of submission	<u>Yes</u>	<u>No</u>	Evidence provided. Current year “Hold Harmless” legislation due to COVID-19 Pandemic funds school at prior year ADA levels
F48	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
F49	Charter school has clear procedures for disenrolling students and providing notification to the student’s district of residence.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
F50	Charter school has clear procedures for claiming and reporting ADA to the state.	X Policies and procedures related to claiming and reporting ADA. P1,P2,P3 attendance reporting	<u>Yes</u>	<u>No</u>	
F51	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	X Attendance clerk (or equivalent) interview.	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F52</u>	Any changes in enrollment/ADA from school year to school year are reasonable and do not exceed threshold under Operations MOU that would trigger the need for a material revision to the charter.	X Teacher roster and monthly ADA reports. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim projections	<u>Yes</u>	<u>No</u>	
<b><u>Student Attendance (Schools Offering Independent Study)</u></b>					
<u>F53</u>	Charter school annually certifies independent study courses as being of the same rigor and educational quality as classroom-based courses, including information regarding instructional minutes, as required by Education Code section 51749.5(a)(4).	X Certification X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F54</u>	Teachers and students communicate in person, by phone, or by other live visual or audio connection at least twice per month, as required by Education Code section 51749.5(a)(7).	X Independent study coordinator (or equivalent) interview  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F55</u>	Charter school retains evidence of satisfactory educational progress for each independent study student, including a file of representative samples of each student’s work products (signed/initialed and dated by supervising teacher).	X Sample grade books X Sample transcripts X Work samples	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F56</u>	Charter school does not offer courses required for high school graduation or UC or Cal State admission exclusively through independent study, as prohibited by Education Code section 51749.5(a)(13).	X List of course offerings	<u>Yes</u>	<u>No</u>	
<u>F57</u>	The program of each student in independent study is overseen by a certificated employee.	X Student enrollment report X Staff organizational chart X DCOT HR Lead interview	<u>Yes</u>	<u>No</u>	
<u>F58</u>	Charter school meets ratio of ADA to FTE certificated employees required by Education Code section 51745.6(d) (i.e., 25:1 or ratio in largest unified school district).	X School ADA Reports X Staff organizational chart X Ratio Calcs Report	<u>Yes</u>	<u>No</u>	
<u>F59</u>	Governing board has adopted and implemented written policy regarding the maximum length of time (by grade level and type of program) that may elapse between independent study assignment and completion.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F60</u>	Governing board has adopted and implemented written policy regarding the number of missed assignments allowed before the school conducts an evaluation to determine whether student should remain in independent study.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F61</u>	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	X Sample agreements  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F62</u>	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F63</u>	Charter school does not provide any funds or other things of value to students who attend independent study programs (or their parents/guardians) that it does not provide to students who attend classroom-based programs (or their parents/guardians).	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F64</u>	Charter school claims ADA only for students who are residents of the county in which the apportionment claim is reported, or who are residents of a county immediately adjacent to the county in which the apportionment claim is reported.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F65</u>	Charter school maintains daily/hourly attendance credit register (separate from classroom attendance records) on a current basis as time values of student work products are evaluated by certificated teachers.	X Credit register, student work samples X Independent study coordinator (or equivalent) interview X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F66</u>	Charter school claims apportionment credit for independent study only to the extent of the time value of student work products, as personally judged in each instance by a certificated teacher.	X Credit register, student work samples X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No / N/A</u>	
<u>F67</u>	Pursuant to Education Code section 47634.2, charter school has submitted a determination of funding form, and SBE subsequently issued a determination of funding.	X Request for determination of funding X SBE determination of funding	<u>Yes / No</u>	<u>No</u>	

815-21/4810246.1

# Cabrillo Point Academy: Personnel

## Context

The 20-21 Personnel Oversight Checklist Review compared to the 19-20 DCOT review for Cabrillo Point Academy was a much easier and more efficient process. A new Director of HR, Celia Ewing, brought to the review quick and effective responses to requests needed for the review. 19-20 concerns were addressed in the 20-21 review in regards to the discrepancies in staffing lists. All areas of staffing review on the Oversight Checklist for 20-21 matched. There was one area of Low-level concerns from the Oversight Checklist.

## Compliance Area Concerns

- This Low level of Concern was related to #P15 which relates to English Learner authorizations on credentials. A letter was sent out to all teaching staff to complete EL requirements by 6/30/21. If teacher is not EL compliant their contract will not be renewed for 21-22. This was also addressed in the 19-20 concerns by Dehesa.

## Best Practices

- Follow up and monitor all low-level concerns.

Assigned District Staff Person: Celia Ewing – Cabrillo Point Academy Charter School  
 Position of Assigned Staff Person: Director of Human Resources

**CABRILLO POINT ACADEMY - PERSONNEL OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>All Employees</u></b>					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	X Employee handbook X Employee policies X Approved charter X Employment-related MOUs	<u>Yes</u>	<u>No</u>	MOU included to use Ed code option 44865 for teacher assignments.
P2	Charter school employee handbook and policies guarantee fair hiring practices.	X Employee handbook X Employee policies	<u>Yes</u>	<u>No</u>	
P3	Charter school enters employment contracts with all persons hired to work at school.	X Sample employment contracts	<u>Yes</u>	<u>No</u>	
P4	All employees have been fingerprinted, including Department of Justice background checks.	X Documentation of fingerprint clearance for all employees	<u>Yes</u>	<u>No</u>	
P5	All employees have passed TB test and results are current.	X Documentation of current TB test results for all employees	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u> <u>Yes / No</u>	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	X Certificates of training	<u>Yes</u>	<u>No</u>	
P7	If charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	X Certificates of training	<u>Yes</u>	<u>No</u>	31 Staff employees – completed training
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	X Observation of main office /website	<u>Yes</u>	<u>No</u>	19-20 observation on site review.  20-21 review – photos were submitted from HR office.
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	X Employee handbook	<u>Yes</u>	<u>No</u>	
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	X Employee handbook	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P11	Governing board approves personnel actions.	X Governing board minutes	<u>Yes</u>	<u>No</u>	Board does not approve PA’s. Executive Director has authority to hire, fire, evaluate 4/21/20 board meeting. Submitted 2 Board meetings. (req – 3)  At the conclusion of the 19-20 oversight process, the parties agreed that new hires would be reported to the board, but formal board approval would not be required
<b><u>Certificated Employees</u></b>					
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	X Staff organizational chart X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operation MOU approved 12/14/20
P13	Charter school provides teachers with professional development opportunities.	X Professional development calendar X Professional development session agenda X Teacher interviews	<u>Yes</u>	<u>No</u>	
P14	Teachers providing instruction in core subject areas have the required credentials and certifications to meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of credentials and certifications held by core teachers X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 12/14/20

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	X Staff organizational ) X Documentation of credentials and certifications held by teachers	<u>Yes</u>	<u>Low</u>	Letter sent to ALL teaching staff to complete EL requirements by 6/30/21
P16	Teachers providing special education and related services have required credentials and certifications.	X Staff organizational chart X Documentation of credentials and certifications held by special education teachers	<u>Yes</u>	<u>No</u>	
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	X Sample evaluations X Teacher interviews	<u>Yes</u>	<u>No</u>	Teacher interview completed 2/23/21
<b><u>Classified Employees</u></b>					
P18	Classified employees who provide instructional support in core subject areas, special education, and English language learning meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of qualifications held by classified aides X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 12/14/20

# Cabrillo Point Charter: Educational Program & Student Services

## Context

Per their website Cabrillo Point Academy is a tuition-free, public charter school serving transitional kindergarten through 12th grade students in Orange County. The virtual/independent study school serves approximately 4300 students, grades TK – 12 with offices located in Orange County. The Principal is in charge of the Educational Program.

## Compliance Areas of Concern

### E16 - Low

This Low Level Concern relates to the Charter school SBAC and Dashboard Data indicating that the Charter school is on target for meeting renewal requirements as set forth in EC 47607. In 2019 the Charter school scored below the state levels for 3 of 4 academic criteria for renewal and had under 90% SBAC participation. With COVID-19 restrictions and exceptions this has been a challenging criterion to meet.

### E36 - Low.best practice

This Low Level Concern relates to the Charter school providing for the screening of pupils' vision, hearing, screening for scoliosis, and required immunizations. Current documentation confirms that immunizations are required for students who participate in in-person learning. Screening for scoliosis and vision is not provided.

### E42 - Low

This Low Level Concern relates to the Charter school Charter school having developed methods for informing parents/guardians of students in grades 6-12 regarding human trafficking prevention resources, as required by Education Code section 49381. Currently the Charter school has a link on its website to a generic fact sheet from the US Govt.

## Best Practices

- E8: Provide the necessary notifications in the student/parent handbook or via other methods to the appropriate students and their parents on an annual basis.
- E16: Develop and implement a plan to support all student subgroups in meeting or exceeding the statewide average for performance on the ELA and Math portions of state testing. Teacher requirements for interaction with students every 20 days could be reduced to fewer days to avoid students falling behind. This was suggested in the 2019-20 Oversight Report.
- E27: Charter school strives to reflect a similar demographic to the local or authorizing school district.
- E36: Follow up on the legal requirement for providing both scoliosis and vision screening for students and provide documentation as to status.
- E42: Develop and implement a plan for informing parents/guardians of students in grades 6-12 regarding human trafficking prevention resources, as required by Education Code section 49381. Perhaps this information could be included as more than just a link.

Assigned District Staff Person: Jenna Lorge  
 Position of Assigned Staff Person: Principal

**CABRILLO POINT ACADEMY - EDUCATIONAL PROGRAM AND STUDENT SERVICES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Educational Program</u></b>					
E1	Charter school curricular and instructional plan complies with approved charter.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence	<u>Yes</u>	<u>No</u>	Course descriptions in handbook and petition
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Courses and scope and sequence varied depending on parent choice, Very customizable
E3	Charter school staffing complies with approved charter.	X Approved charter X Staffing chart	<u>Yes</u>	<u>No</u>	
E4	Charter school staffing is sufficient to carry out educational program.	X Staffing chart • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	From chart staffing appears to be sufficient
E5	If applicable, parents of high school students are informed about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements.	X Student handbook	<u>Yes</u>	<u>No</u>	Transferability is aligned to WASC accreditation - this is discussed in handbook

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E6	Charter school has obtained WASC accreditation, if applicable.	X WASC accreditation	<u>Yes</u>	<u>No</u>	Accreditation for 6 years received 2019-good thru 2025 with a mid-cycle revisit
<b><u>Services to Special Populations</u></b>					
E7	Charter school follows process for identification and reclassification of students who are English Learners.	X Student handbook • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Generic examples (templates) for parent notification provided.
E8	If charter school graduates students, it has notified students in foster care, homeless students, and students of a military family or with migrant status of their rights of exemption from local graduation requirements.	X Student handbook • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>Low</u>	Not evident in student handbook although mention is made that CPA has programs for military, foster and other students of special populations. Needs to be more transparent
E9	Charter school policies and practices ensure referral and assessment of students suspected of needing accommodations under Section 504.	X Student handbook X Charter policies and procedures manual X CALPADS reports for Fall 1 submission • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Sample plan provided
E10	Students identified as eligible under Section 504 receive accommodations and supports required by their 504 plans.	X Sample 504 plans • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Sample plan provided

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Curricular Materials</u></b>					
E11	Charter school uses standards-aligned instructional materials.	X Description of courses, instructional framework, and/or scope and sequence N/A Classroom observations	<u>Yes</u>	<u>No</u>	Standards aligned materials are available per student handbook. However, parents may choose to select materials that are not standards-aligned if preferred
E12	Charter school uses instructional materials that address the specific needs of English Learners.	X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview N/A Classroom observations	<u>Yes</u>	<u>No</u>	El Curriculum described in handbook Classroom observations not possible in homeschool environment
E13	Charter school provides integrated English Language Development within regular classes in all content areas in a manner that is aligned with state content and ELD standards.	• Instructional leader (or equivalent) interview N/A Classroom observations	<u>Yes</u>	<u>No</u>	Outlined in petition
E14	Charter school provides designated English Language Development for a specific protected time during the school day that is aligned with ELD standards.	• Class schedule • Instructional leader (or equivalent) interview N/A Classroom observations	<u>Yes</u>	<u>No</u>	Outlined in petition

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Assessment</u></b>					
E15	Charter school administers state-mandated testing according to testing rules and regulations as required for all K-12 schools in California.	<ul style="list-style-type: none"> <li>X Assessment calendar</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	<p>Page 39 of handbook states that “It is very important to the school that all students participate in school wide assessment.” CPA does administer state assessments but it appears that they are not required or even encouraged. Need to look at assessment data to review participation levels. 2019-20 SARC indicates that less than 90% of students are tested using state assessments</p> <p>Assessment calendar provided</p> <p>Assessment in 2019-20 was affected by Covid-19 and school shutdowns. Should be monitored in upcoming years</p>
E16	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607.	<ul style="list-style-type: none"> <li>X SBAC</li> <li>X Dashboard Data</li> </ul>	<u>Yes</u>	<u>Low</u>	For 2019 they are below the state levels for 3 of 4 academic criteria for renewal, with under 90% SBAC participation
E17	Charter school has completed and timely posted a SARC containing required elements.	X SARC	<u>Yes</u>	<u>No</u>	On website
E18	Charter school regularly collects student achievement data and reports it to parents and staff.	<ul style="list-style-type: none"> <li>X Sample data reports to parents</li> <li>X Sample data reports to staff</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Sample reports for STAR/Renaissance provided



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E19	Charter school provides required notifications of language proficiency assessments (ELPAC), including whether a child is a long-term English Learner or is at-risk of becoming one.	X Notifications/letters to parents X Home language surveys	<u>Yes</u>	<u>No</u>	Generic (template) examples provided
E20	Charter school has a Learning Continuity Plan (2020-21 school year only). LCP has been presented to, reviewed, and approved by the Charter school’s Board.	X LCP X Minutes from Board meeting	<u>Yes</u>	<u>No</u>	On website
E21	Learning Continuity Plan addresses student academic performance across all student populations.	X Review of LCP	<u>Yes</u>	<u>No</u>	
E22	Title I funds/categorical funding are being used to supplement the school’s LCP goals.	<ul style="list-style-type: none"> <li>• LCP</li> <li>• Director of finance (or equivalent) interview</li> </ul>	Yes	<u>N/A</u>	Not Title I
E23	As applicable, the charter school has completed a School Plan for Student Achievement (SPSA) that meets federal school planning and stakeholder requirements for Title I for the 2020-21 school year.	<ul style="list-style-type: none"> <li>• SPSA</li> </ul>			Not Title I

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E24	The charter school has complied with the programmatic requirements for the development and implementation of a school site council (including composition, meetings, etc.) if it receives federal funding under Title I.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• School site council handbook</li> <li>• Membership lists</li> <li>• Meeting notices/agendas and minutes</li> </ul>			Not Title I
<b><u>Admissions</u></b>					
E25	Charter school complies with the admissions practices described in the approved charter.	<p>X Approved charter</p> <p>X Admissions/enrollment forms and policies</p> <p>X Lottery procedures</p>	<u>Yes</u>	<u>No</u>	<p>Lottery procedures outlined on pages 66-67 in petition. Lottery date, if needed, is posted on website during enrollment period.</p> <p>Enrollment concerns: Of the 4330 enrolled students, 3733 Orange Cty (86%), 560 Rvsd Cty (13%), 126 SD Cty (3%), 4 Imp Cty, 2 LA Cty, 2 San Bern Cty, 2 Ventura Cty, 1 Sac Cty (7 in non-contiguous counties)</p> <p>Verified that per Ed Code section 48204.6.children of military families applies to the above identified students.</p> <p>Website states they serve students from Orange County and does not mention other counties.</p>
E26	Admissions process for a student with an IEP is the same as for a student without an IEP.	<p>X Admissions/enrollment forms and policies</p>	<u>Yes</u>	<u>No</u>	Per student handbook, admission requirement are the same for students with an IEP

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E27	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	X Charter school student data X Student data from nearby school districts	<u>Yes</u>	<u>Low</u>	Data provided is somewhat similar to Dehesa school District.
E28	Charter school enrollment forms indicate compliance with all applicable laws, including prohibition on collecting information regarding immigration status; prohibition on collecting social security numbers unless required by law; and, as required by Education Code section 49452.9(a), health care coverage options and enrollment assistance information.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	Enrollment form provided

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E29	If charter school has used lottery system to determine which students will be allowed to enroll, process was held in the manner described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>No</u>	Procedures outlined in petition
<b><u>Discipline</u></b>					
E30	Charter school discipline policies and practices are consistent with terms of charter.	X Approved charter X Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	Behavior and discipline policies are the same for all students. The Handbook does address suspension and expulsion for SWD  Data provided shows no to low exp.susp rates
E31	Student discipline procedures comply with due process requirements set forth in Education Code section 47605, charter, and/or discipline policies and procedures, including all requirements for disciplining students with disabilities.	X Discipline policies and procedures, including policies regarding discipline of students with disabilities • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Yes, per handbook
E32	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	X Discipline data X Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	Suspension and expulsion are very low or non-existent or non-classroom based charets. Data does not indicate disproportionality

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Health and Safety</u></b>					
E33	Charter School has and annually updates its school safety plan, addressing fire emergencies, earthquakes, criminal incidents, accidents, injuries, and other threats to the health and safety of students and staff, consistent with Education Code requirements.	X School safety plan	<u>Yes</u>	<u>No</u>	SARC indicates that SSP is updated annually Safety plan in petition Safety Plan could not be found on school website Rec that annual update approval date is include in document School Safety plan provided
E34	Staff has been trained in health, safety, and emergency procedures, and appropriate first aid supplies are kept on hand.	X Training sign-in sheets N/A Observation of main office	<u>Yes</u>	<u>No</u>	Roster of training completed by staff members provided
E35	Charter school has a policy/procedure for visitors to enter and leave campus.	N/A Policy or procedure	Yes	<u>N/A</u>	Non-classroom based
E36	Charter school provides for the screening of pupils’ vision, hearing, screening for scoliosis, and required immunizations.	<ul style="list-style-type: none"> <li>Records of student screenings</li> </ul>	Yes	<u>Low</u>	Information on this is not provided. It is not included in the student handbook. Handbook does state that immunization record is required for enrollment

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E37	If charter school serves students in grades 7-12, governing board has adopted Suicide Prevention Policy that was created in conjunction with stakeholders, specifically lists its high-risk groups, addresses the needs of those high-risk students, and was updated in the last 5 years.	<p>X Suicide Prevention Policy</p> <ul style="list-style-type: none"> <li>• Board meeting minutes</li> </ul>	<u>Yes</u>	<u>No</u>	<p>SPP in handbook</p> <p>Rec that annual update approval date is include in document</p>
E38	If charter school qualifies for FRPL for all meals that it provides, it has applied to provide a universal meal service to all students at the school, or, if not, has submitted a governing board resolution to the state claiming a fiscal hardship (with evidence that those finding are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> <li>• Application for universal meal service</li> <li>• Board resolution</li> </ul>	Yes	<u>N/A</u>	Not applicable
E39	Charter school provides at least one meal per day to students who qualify for FRPL, except as provided for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Executive director (or equivalent) interview</li> </ul>	Yes	<u>N/A</u>	
E40	Charter school posts on its website in a prominent, conspicuous location, the Title IX information, including the name and contact number/e-mail for the Title IX Coordinator for that school.	<p>X Screenshot from website</p>	<u>Yes</u>	<u>No</u>	Available on website

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E41	If charter school serves students in grades 7-12, it provides comprehensive sexual health and HIV prevention education, as required by Education Code section 51930, et seq.	X Sexual health and HIV prevention education course description	<u>Yes</u>	<u>No</u>	Course catalogs indicate that this course is available
E42	Charter school has developed methods for informing parents/guardians of students in grades 6-12 regarding human trafficking prevention resources, as required by Education Code section 49381.	X Policy or other description of method for informing parents/guardians	<u>Yes</u>	<u>Low</u>	Website link <a href="https://cabrillopontacademy.org/resources/human-trafficking-prevention">https://cabrillopontacademy.org/resources/human-trafficking-prevention</a>  Simply provides a generic fact sheet form US Govt. No school plan on website. No description of informing parents on website
<b><u>Parent Notifications</u></b>					
E43	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	X Notice	<u>Yes</u>	<u>No</u>	Provided in student/parent handbook
E44	If charter school serves students in 11th grade, parents of those students are notified by January 1st that the students will be deemed a Cal Grant applicant unless the student opts out, as required by Education Code section 69432.9(d)(1).	X Notice	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E45	If charter school serves students in 12th grade, parents of those students are notified of student’s GPA by October 1st, as required by Education Code section 69432.9(c)(2).	X Notice	<u>Yes</u>	<u>No</u>	
E46	Charter school notifies parents at least twice a year regarding how to initiate access to available student mental health services on campus or in the community.	X Notice	<u>Yes</u>	<u>No</u>	Website provides minimal information Parent letter provided
<b><u>Student Records</u></b>					
E47	Charter school maintains comprehensive records regarding its students.	X Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number	<u>Yes</u>	<u>No</u>	Provided in requested materials and documents
E48	Charter school maintains student records, including special education records, in a confidential and secure location.	X Policy regarding confidentiality of student records N/A Observation of main office	<u>Yes</u>	<u>No</u>	Not provided although records department info in is handbook
E49	Charter school has a policy or procedure for parents to review student files, including a log.	X Policy regarding review of records	<u>Yes</u>	<u>No</u>	Protocol for records is described in handbook
E50	Charter school has policy or procedure regarding release of student information.	X Policy regarding release of student information	<u>Yes</u>	<u>No</u>	Records department information is included in handbook



No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E51	Teachers have reasonable access to special education records.	X Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	CPA indicates that teachers have access to necessary student records

# Cabrillo Point Academy: Special Education

## Context

Cabrillo Point Academy (CPA) is its own independent LEA member of the El Dorado Charter Special Education Local Planning Area (SELPA) for special education purposes and is solely responsible for implementing all state and federal special education requirements and for complying with all applicable laws and regulations pertaining to students with disabilities. The MOU between CPA and Dehesa School District was renewed on July 1, 2019 and will end on June 30, 2024.

Cabrillo Point Academy is a general education independent study program that provides special education supports based on a student's Individualized Education Program (IEP). Parents, homeschool teachers (HST), instructional coaches and service providers work together as instructional partners to ensure students can access the curriculum. The majority of students with IEP's enrolled in CPA require services within the mild to moderate range and receive support from a credentialed education specialist. All education specialists are employees of the charter school. CPA also staffs 4 school psychologists and one occupational therapist. All other required services are contracted by approved non-public agencies.

There is no change to the CPA Annual Performance Report for 2019-2020. Due to COVID-19, all state assessments were suspended, and measures continue to be taken from 2018-2019 data.

The Cabrillo Point Academy special education procedures manual, as well as the El Dorado Charter SELPA policies outline clear procedures for the placement of students with IEP's. Upon initial enrollment, the IEP is reviewed by the special education director or coordinator to ensure appropriate services are provided. The team then reviews within the first 30 days to make adjustments as needed. The CPA manual also indicates clear referral processes and tiered systems of support when the team suspects a disability. CPA follows a Student Study Team (SST) process when referring students for special education evaluation. The HST works with an intervention teacher to first put supports in place with the general education setting, setting goals and tracking progress along the way.

Students identified as eligible for special education services have access to the full range of services as indicated by their IEP. The sampling of IEP's submitted for review demonstrate that all required members of the IEP team were present at the meeting. CPA and SELPA policies indicate clear timelines in accordance with the Individuals with Disabilities Education Act (IDEA) and the California Department of Education (CDE).

As of November 2020, CPA had an enrollment of 4649, with 469 students eligible for an IEP. Their special education population of 10.08% is consistent with the 2020 state average of 11.7%. Discipline data from 2018-2019 (most recent available due to Covid), data provided indicate that there were no suspensions for students with disabilities.

## Compliance Area Concerns

- There are no areas of concern.

## Best Practices

- Continue to ensure that special education policies and procedures are clearly outlined and implemented.

Assigned District Staff Person: Pamela Gandara  
 Position of Assigned Staff Person: Special Education Director

**CABRILLO POINT ACADEMY - SPECIAL EDUCATION OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Special Education Program</u></b>					
S1	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Procedures for placing students with IEP’s outlined in manual; interview revealed that students with IEP’s are appropriately placed upon enrollment.
S2	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	manual identifies process for referrals and assessment
S3	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Timelines are clearly identified in procedure manual

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
S4	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	X Sample IEPs X Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	IEP’s and interview indicate that students receive services as outlined in the IEP
S5	All required members of IEP teams attend IEP meetings.	X Sample IEPs	<u>Yes</u>	<u>No</u>	Sample IEP’s indicate all required team members were present
S6	Charter school does not enroll a disproportionately small number of students with disabilities.	X Data demonstrating percentage of students with disabilities in charter school	<u>Yes</u>	<u>No</u>	10.08% as of Nov. 2020 (total enrollment 4649; 469 w/ IEP’s)
S7	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Worked with student services dept. to established clear process for invoicing expenditures. Different budget code for sped (IEP) vs. student services (504).
S8	Board and charter school administration are aware of and familiar with the terms of the special education MOU between the District and the charter school.	X Special Education MOU • Review of agenda and minutes • Board President interview	<u>Yes</u>	<u>No</u>	Renegotiated MOUs started July 1, 2020.
S9	Charter school has fulfilled its obligations under the MOU, including the submission of any required documentation to the authorizer.	• Records of authorizer	<u>Yes</u>	<u>No</u>	

# Cabrillo Point Academy: Facilities/Operations

## Context

Cabrillo Point Academy (CPA) has been in a transition over the 2020-2021 school year and is taking steps to leave the Provenance Charter Schools charter management organization. CPA a virtual independent study charter school with two locations; a center for administration and board meetings located at 3152 Red Hill Ave #150 Costa Mesa, CA 92626, and a commercial building for storage, tech support and administration located at 13195 Danielson St #100 & #200 Poway, CA 92064. Interviews and checklist items addressed only one low level concern.

## Compliance Area Concerns

- Checklist items 04, 05, 07 and 08 address issues at Red Hill location which is limited to Board Meetings and administration.

## Best Practices

- Follow up and monitor Low Level Concerns related to Red Hill offices.

Assigned District Staff Person: Jenna Lorge, Erika Vanderspek  
 Position of Assigned Staff Person: Senior Director/Assistant Senior Director

**CABRILLO POINT ACADEMY - OPERATIONS AND FACILITIES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Maintenance of Facilities</u></b>					
O1	A designated person is responsible for overseeing operations and facilities management.	X Staff organizational chart	<u>Yes</u>	<u>No</u>	Senior and Assistant Senior Directors have self-identified as such
O2	Facilities are adequate for number of students and types of programs.	X Capacity chart for campus facilities X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	Capacity charts can be reviewed in Comprehensive School Safety Plan
O3	Charter school has process for routine inspections of grounds to ensure that they remain in good condition and free from mold and other hazardous substances.	X Inspection logs X Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Legal Compliance</u></b>					
O4	All facilities meet Americans with Disabilities Act requirements.	X ADA certification	<u>Yes</u>	<u>Low</u>	Red Hill has a compliance review using Compliance Design Consultants, the estimated completion dates aren’t signed off by property owner

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O5	All single-user restrooms have been designated as all-gender restrooms.	X Operations manager (or equivalent) interview	No	Low	Observed at Danielson St office, but not at Red Hill.
O6	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan	<u>No</u>	<u>N/A</u>	Modern construction
O7	Charter school has certificate of occupancy on file.	<input type="checkbox"/> Certificate of occupancy	<u>No</u>	<u>Low</u>	Application in process for Red Hill
O8	Charter school has conditional use permit on file, as applicable.	<input type="checkbox"/> Conditional use permit	<u>No</u>	<u>Low</u>	Business license/permit for Danielson St only
O9	Charter school has safety inspection by local fire department on file.	X Safety inspection by local fire department	<u>Yes</u>	<u>No</u>	Danielson St has local fire inspection  Redhill location has fire alarm inspection
O10	If charter school participates in an interscholastic athletic program, it has a written emergency action plan and at least one automated external defibrillator for the school.	X Emergency action plan X Operations manager (or equivalent) interview	<u>Yes</u>	<u>NA</u>	There are no athletics  There is a Comprehensive School Safety Plan

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O11	If charter school serves any grades 6-12, and meets the 40% pupil poverty rate, it provides feminine hygiene products, including tampons and sanitary napkins, in a least 50% of the school’s restrooms.	X Operations manager (or equivalent) interview	<u>No</u>	<u>N/A</u>	Virtual instruction only
O12	If charter school is aware of a lactating pupil, it has made accommodations for lactation other than a restroom and has provided a place to safely store milk.	X Operations manager (or equivalent) interview	<u>N/A</u>	<u>N/A</u>	Virtual instruction only
O13	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	X Certificates of insurance	Yes	<u>No</u>	
O14	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1, as recently amended by Assembly Bill 1507.	X Operations manager (or equivalent) interview X Designation of any charter facilities (e.g., resource centers, etc.) X Review of addresses of facilities	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>  [Indicate <u>N/A</u> if applicable.]	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O15	Charter school has identified all facilities and their respective locations, including those that are available for use by students enrolled in the charter school for any purpose related to the charter school’s educational program (whether or not such facility(ies) is/are owned, leased, rented, or subleased by the charter school or a different entity).	<input checked="" type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
O16	Charter school has not added or begun using any new or different facilities that are not identified in the most recent charter petition or material revision (as applicable) approved by the District’s governing board.	<input checked="" type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview <input type="checkbox"/> Authorizer records	<u>Yes</u>	<u>No</u>	



**Dehesa  
Charter Oversight  
Report**

**Pacific Coast  
Academy**

# Pacific Coast Academy: Governance

## Context

Pacific Coast Academy is a California public benefit corporation (created in 2017) and is exempt from federal tax under Section 501 (c)(3) of the Internal Revenue Code. It is governed by a 5-member governing board (may be expanded to 11 by bylaws, although charter says 5 maximum) and is led by an Executive Director. The school was previously part of the Inspire (renamed Provenance, now ThinkSuite) charter school network but has made substantial progress toward becoming fully independent of the network in the past two years. It is implementing a “wind down” plan to substantially reduce its dependence on Provenance/ThinkSuite.

## Compliance Area Concerns

Since the 2019-2020 charter review, the school has continued to advance toward becoming independent of the Provenance network. That work has involved substantial board development, including new members, governance training, committee formation and engaging the board in leader evaluation. Bylaws have been updated and several important policies have been developed or updated. Board documents are well-organized, with transparency assured through the school website. No areas of “high” concern were noted in this year’s review. The following “low” level concerns were noted:

- Although complaint policies and procedures are in place, unable to find a basic complaint form (or “how to”) for addressing an issue with school administration or board.
- Parent participation in governance as described in the charter includes a Parent Teacher Organization (PTO) which the school is still working to develop. A DELAC was formed and is functioning with some parent participation; the board is considering the best structure for parent advisory role (including a School Site Council). The observed board meeting included parent complaints about a lack of transparency, likely stemming from the school’s history with Inspire/Provenance.

## Best Practices

The following suggested changes in governance may support the school’s further improvement:

- At or before time of next charter renewal, charter document should be updated to reflect changes made to governance, organizational structure and operations as part of the separation from Provenance.
- Over the past year, the board has held several special meetings, including “specials” held the same day as regular meetings. This is understandable given the many challenges facing the school in the past year. The dedication of board members in attending so many meetings is commendable, but better planning could help avoid board “burn-out” in the future. Reflecting on the content of agendas this past year may also help more clearly define the line between administration and governance, and the appropriate limits on board involvement.
- As part of its long-term planning, the board may benefit from developing a matrix of board member knowledge and skills that would serve the organization as it grows and evolves. A board constituted wholly of current parents may tend to focus on immediate management issues that they experience personally, rather than priorities for the school as a whole. They may also lack the range of experience in other schools and organizations that enriches board discussion.

Assigned District Staff Person: Jennifer Faber and Kelly Durso  
 Position of Assigned Staff Person: Senior Director and Board President

**PACIFIC COAST ACADEMY - GOVERNANCE OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Organizational Management</u></b>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<ul style="list-style-type: none"> <li>× Articles of Incorporation</li> <li>× Bylaws</li> </ul>	<u>Yes</u>	<u>No</u>	Articles of Incorporation and bylaws are posted on the school’s website (Accountability & SARC tab). (In an extensive on-line collection of policies, was unable to find one foundational document: the charter.)
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<ul style="list-style-type: none"> <li>× Bylaws</li> </ul>	<u>Y</u>	<u>No</u>	Key bylaws components present; amended June 2020; reviewed/revised/approved by board at June 18, 2020 special meeting.
G3	Any changes to charter or bylaws have been approved by charter school’s governing board and submitted to the authorizer.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Changes made were approved by the governing board and submitted to the authorizer.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
G4	Charter school has an organizational chart and job descriptions that delineate clear separation of duties and responsibilities.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Organizational chart</li> <li>× Job descriptions CEO/CBO</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	School leader job description is thorough. CBO description provided was management and accounting services agreement. Job description for individual who acts as primary liaison with service provider would be useful.
G5	Governing board has a robust, outcomes-based process for evaluating the charter school leader.	<ul style="list-style-type: none"> <li>× Most recent charter school leader evaluation</li> <li>× Board president interview</li> </ul>	<u>Y</u>	<u>No</u>	Process described is thorough and evaluation criteria are robust. High level of board engagement in process, with effective use of board committee.
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<ul style="list-style-type: none"> <li>× Bylaws</li> <li>× Approved charter</li> <li>× Executive director (or equivalent) interview</li> <li>• Teacher interview</li> <li>× Information available on charter school’s website</li> </ul>	<u>Y</u>	<u>Low</u>	Parent teacher organization described in charter not currently active but continued effort is being made by administration and board. Some parent/public participation at board meetings (of 22 minutes reviewed, public comments at 7), although several parents participated in observed board meeting (Feb 2021).
<b><u>Composition</u></b>					
G7	Charter school has a list or roster of governing board members that is publicly accessible.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Information is available on charter school’s website</li> </ul>	<u>Y</u>	<u>No</u>	

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G8	Composition of governing board is consistent with approved charter.	<ul style="list-style-type: none"> <li>× List of board members</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Bylaws and charter do not contain board qualifications other than that one member shall be a parent of a current student. Currently, all 5 members are parents of PCA students.
G9	Governing board is diverse and reflects charter school and community population.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Description of school and community demographics</li> </ul>	<u>Y</u>	<u>No</u>	Bylaws allow for growth of board to facilitate representation.
G10	Governing board members have relevant knowledge and experience in key areas, such as education, finance, legal, real estate, and fundraising.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Information posted on charter school’s website</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	Board members have relevant knowledge and experience and appeared to be both prepared and engaged in the issues before them.
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<ul style="list-style-type: none"> <li>× Board member biographies</li> <li>× Completed Form 700s</li> <li>× Completed Form 990s</li> <li>× Agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	One board abstention in October 2020 for potential conflict regarding property sublease. Existence of actual conflict was unknown, but abstention was appropriate in the circumstances and properly documented.

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted ?  Yes / No  (shown as Y if not submitted but available on website)	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Meetings</u></b>					
G12	Governing board conducts meetings as frequently as is needed to ensure that it addresses necessary charter school business, and such meetings are consistent with timelines set forth in charter and bylaws.	<ul style="list-style-type: none"> <li>× Annual governing board meeting calendar</li> <li>× Bylaws</li> <li>× Approved charter</li> </ul>	<u>Y</u>	<u>No</u>	Board meets monthly, but had many special meetings during the past year. (An unprecedented year, particularly for this school.)
G13	Governing board members receive annual training regarding Brown Act requirements.	<ul style="list-style-type: none"> <li>× Sign-in sheet from Brown Act training</li> <li>× Copy of materials (e.g., Power Point slides)</li> </ul>	<u>Y</u>	<u>No</u>	
G14	Meetings are noticed and conducted in accordance with the Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of accessibility of meeting (location, online participation, public comment time, etc.)</li> <li>× Screenshot of charter school website</li> </ul>	<u>Y</u>	<u>No</u>	Agendas compliant although item descriptions are minimal. Observed meeting conducted in accordance with Brown Act. Comments on non-agenda items were handled well, despite awkwardness of virtual meeting format.
G15	Discussion during Board meetings is limited to properly-noticed items on agenda.	<ul style="list-style-type: none"> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	No non-agendized discussion at observed meeting.
G16	Board use of closed session during noticed meetings is consistent with Brown Act.	<ul style="list-style-type: none"> <li>× Sample meeting agendas and minutes</li> <li>× Observation of meeting</li> </ul>	<u>Y</u>	<u>No</u>	Closed session properly noticed for observed meeting and on other agendas; “report outs” were sufficient.

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G17	Meeting agendas include sufficiently-detailed items of business to be transacted and any necessary action to be taken by the Board.	× Sample meeting agendas	<u>Y</u>	<u>No</u>	Agendas descriptions are minimal, but sufficient. If parents continue to participate, more description of items could help avoid confusion.
G18	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	× Sample meeting agendas × Public comment policy	<u>Y</u>	<u>No</u>	Complete public comment notice on agenda.
G19	Board members solicit and provide and/or solicit input from the community served.	× Board biographies × Advisory committee/PTO documents × Board President interview	<u>Y</u>	<u>No</u>	Challenges in establishing structure for parent engagement in governance and decision-making, but parents participated in observed meeting and discussed need to improve parent organization structure.
G20	Minutes are approved and thereafter made available to the public.	× Sample meeting minutes × Screenshot of charter school website	<u>Y</u>	<u>No</u>	Minutes approved at subsequent regular meeting. (May be some delay in posting on the school’s website.)
G21	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	× Board meeting minutes	<u>Y</u>	<u>No</u>	



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<b>Board Policies [Note: The oversight team lead may request additional policies for review that are not listed here.]</b>					
G22	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<ul style="list-style-type: none"> <li>× Parent handbook</li> <li>× Student handbook</li> <li>× Employee handbook</li> </ul>	<u>Y</u>	<u>No</u>	Employee handbook update approved September 24, 2020; parent/student handbook update approved August 2, 2020.
G23	Governing board has adopted policies related to conflict of interest, which align with the requirements of Education Code section 47604.1.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	Conflict code in place and in use. Board received conflicts training from school’s attorney.
G24	Governing board has adopted/updated policies related to student discipline and due process.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	Suspension/expulsion policy tracks Education Code. (Policy undated but approved May 2020. Other policies also undated as posted on website.)
G25	Governing board has adopted/updated policies related to complaints and investigations.	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	UCP adopted September 2020; updated December 2020.
G26	Governing board has adopted/updated internal control policies (and related forms and systems).	<ul style="list-style-type: none"> <li>× Board policies</li> </ul>	<u>Y</u>	<u>No</u>	

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G27	Governing board has adopted/updated policies related to bank signature authorizations.	× Board policies	<u>Y</u>	<u>No</u>	
G28	Governing board has adopted/updated policies related to allowable purchases and purchasing authority.	× Board policies	<u>Y</u>	<u>No</u>	
G29	Governing board has adopted/updated policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	× Board policies	<u>Y</u>	<u>No</u>	
G30	Governing board has adopted/updated policies related to employee harassment.	× Board policies	<u>Y</u>	<u>No</u>	
G31	Governing board has adopted and annually updates its safety plan by March 1 <sup>st</sup> to include all legal requirements applicable to charter schools.	× Board policies × Meeting agenda and minutes reflecting annual review and update	<u>Y</u>	<u>No</u>	Safety plan updated April 2021; COVID protocol adopted October 2020.
G32	Governing board has adopted policies related to immunization records and administration of medication.	× Board policies	<u>Y</u>	<u>No</u>	

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G33	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	× Board policies	<u>Y</u>	<u>No</u>	
G34	Governing board has adopted policies related to Section 504/IDEA compliance.	× Board policies	<u>Y</u>	<u>No</u>	
<b>Education Code Assurances [Note: As part of the review, the oversight team lead will evaluate whether such assurances are consistent with the charter school’s actual operations, based on available information. “Submitted” in this context means some information was available for review, although a full audit was not conducted.]</b>					
G35	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	× Policy review • Executive director (or equivalent) interview × Review of any complaints	<u>Y</u>	<u>No</u>	No evidence of non-compliance
G36	Charter school has complied with assurance that it shall not charge tuition.	× Policy review • Executive director (or equivalent) interview	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G37	Charter school has complied with assurance that it shall not discriminate against any pupil on the basis of the characteristics listed in Education Code section 220.	× Policy review • Executive director (or equivalent) interview × Review of any complaints × Review of recruitment and admissions materials	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

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G38	Charter school has complied with assurance that it shall admit all students who reside in California who wish to attend (up to the Charter School’s capacity based upon space, staff, or Charter School policy).	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> <li>× Review of any complaints</li> <li>× Review of student demographics and enrollment data</li> <li>× Review of recruitment and admissions materials</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G39	Charter school has complied with assurance that it shall determine by public random drawing, which students, other than those already enrolled, will be allowed to enroll if the number of pupils who wish to attend charter school exceeds charter school’s capacity and make reasonable efforts to accommodate the growth of charter school.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.

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G40	Charter school has complied with assurance that it shall comply with EC 47605(d)(2) in regard to the establishment of preferences for enrollment which shall not result in limiting enrollment access for pupils with: disabilities, academically low-achieving pupils, English Learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged or pupils based on nationality, race, ethnicity, or sexual orientation.	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>Y</u>	<u>No</u>	No evidence of non-compliance.
G41	Charter school has complied with assurance that it shall notify the school district of residence of the pupil’s last known address within 30 days if a pupil is expelled or leaves charter school without graduating or completing the school year for any reason	<ul style="list-style-type: none"> <li>× Policy review</li> <li>• Executive director (or equivalent) interview</li> </ul>	<u>N</u>	<u>No</u>	Dehesa has received none; school states that it does send them and provided a sample.

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<b><u>Memorandum of Understanding</u></b>					
G42	Board and charter school administration are aware of and familiar with the terms of any approved MOUs or agreements between the District and the charter school.	<ul style="list-style-type: none"> <li>× Memoranda of understanding</li> <li>× Review of agenda and minutes</li> <li>× Board President interview</li> </ul>	<u>Y</u>	<u>No</u>	Operational and Special Education MOUs approved by board in December 2020. Per minutes, some discussion of contents took place.
G43	Charter school has fulfilled its obligations under the MOU(s), including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Compliant with MOU in governance-related areas.
G44	Charter school responds promptly to authorizer inquiries.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.
G45	Charter school informs authorizer in advance of any proposed material changes to program or operations.	<ul style="list-style-type: none"> <li>× Records of authorizer</li> </ul>	<u>Y</u>	<u>No</u>	Confirmed with district.

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<b><u>Complaint Policies and Procedures</u></b>					
G46	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom, as applicable, and website.	<ul style="list-style-type: none"> <li>× Board policies</li> <li>× Review of student/parent and staff handbooks</li> <li>• Observation of classrooms</li> <li>× Observation of website</li> </ul>	<u>N</u>	<u>Low</u>	Complaint form found in Resources section of website is CDE template designed for complaint to authorizer. Unable to find a form for complaint to school. No complaint form in policy on website or in handbook, although both cover complaint process. On-site postings addressed in other portions of review.
G47	Complaint policies and procedures are available in the main/front office or website for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Observation of main office / website</li> </ul>	<u>Y</u>	<u>No</u>	On-site postings addressed in other portions of review.
G48	Complaints are handled in a manner that is consistent with the charter school’s policies and procedures, and there is no apparent bias or conflicts of interest.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Board President interview</li> <li>× School leader interview</li> </ul>	<u>Y</u>	<u>No</u>	No complaints referenced in board agenda; no evidence to evaluate process.
G49	Charter school has policies that allow for student, parent, and staff complaints to be appealed to the charter school’s Board.	<ul style="list-style-type: none"> <li>× Review of policies</li> <li>× Review of website</li> <li>× Review of student/parent and staff handbooks</li> </ul>	<u>Y</u>	<u>No</u>	UCP includes option of appeal to the board. No policy found on non-UCP complaints.

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G50	Charter school has policies for student disciplinary actions that include appropriate due process.	<ul style="list-style-type: none"> <li>× Review of charter</li> <li>× Review of policies</li> <li>× Review of student/parent handbook</li> </ul>	<u>Y</u>	<u>No</u>	
G51	Charter school leadership discloses and ensures Board is fully informed of any anticipated or pending litigation.	<ul style="list-style-type: none"> <li>× Board President interview</li> <li>× School leader interview</li> <li>× Review of agendas</li> </ul>	<u>Y</u>	<u>No</u>	Multiple closed session items and updates on agenda.
<b><u>Planning</u></b>					
G52	Board adopted a Learning Continuity Plan (2020-21 school year only) by September 30, 2020, which was submitted to the authorizer and San Diego County Office of Education.	<ul style="list-style-type: none"> <li>× Review of LCP</li> <li>× Authorizer records</li> </ul>	<u>Y</u>	<u>No</u>	LCP was adopted and submitted.
G53	Board held a public hearing for review and comment for both the Learning Continuity Plan and budget overview for parents/guardians.	<ul style="list-style-type: none"> <li>× Sample agendas and minutes</li> </ul>	<u>Y</u>	<u>No</u>	Public hearing held for LCP and budget overview.



# Pacific Coast Academy: Finance/Business Summary

## Context

Pacific Coast Academy Charter School provides the education for a projected enrollment of approximately 4,274 students. Due to “Hold Harmless” legislation for the year, the school receives funding from the state based on its prior year’s ADA levels. Per the school’s 2<sup>nd</sup> Interim Report, the Ending Fund Balance for FY 2020-2021 is projected to be \$3.9M, or 9.35% of its projected \$41.7M total projected revenues. The operational balance for FY 2020-2021 projects a yearly Ending Balance of \$43,744. For the 2020-2021 School Year, Pacific Coast Academy made significant strides in disassociating itself from its reliance on Provenance as an outside vendor to provide many of the school administrative services. Many services previously provided by Provenance in years past were “pulled back” and performed in-house by the school for the current FY 2020-2021 year. The school plans on being fully independent from any services being provided by Provenance for the 2021-22 School Year. Interviews and discussions were held with the Executive Director and lead staff of the school’s business/finance outside vendor.

## Compliance Area Concerns

- No Audit findings were noted from the school’s recently completed Audit Report
- Issue related to prior years’ loans and interfund transfers is source of continuing dispute with Inspire/Provenance/ThinkSuite and the school. Approximate dollar amount in dispute between the school and Provenance is same as Cabrillo Point Academy. For several months, the school and Provenance have conducted negotiations on resolving the dispute with no success to date. As of this reporting date, no adjustments to the school’s Balance Sheet for its receivables due from Provenance have been included in projections. School is in an existing Services Agreement with Provenance for Administrative Services through June 30, 2021.

## Best Practices

- The current year Shared Administrative Staff Agreement between Pacific Coast Academy and Mission Vista Charter schools is well done, a creative sharing of administrative tasks and reconcilable via an approved matrix of staff and related payroll. No Leased Teacher/Staff agreement or MOU exists for the current year for the school. The school previously operated under a leased teacher MOU agreement between 14 charter schools in prior years. Allowing for the Leased Teacher MOU to expire and for the school to fully employ the “Teachers of Record” has eliminated a significant amount of confusion in managing staff as well as reducing fiscal transfers back and forth between schools. From a review of the prior year transfers, fiscal reconciliation via the Leased Teacher process was virtually impossible. All “teachers of record” supporting the school’s students in the current year are employed by the school. This is a significant improvement for the school in managing its staffing and payroll.
- A positive offset to any potential negative impact of the dispute noted above, is the school not yet including funding per SB 86 and ESSR II & III related to Stimulus Funding due to COVID-19 Pandemic. These funds should bolster the school’s overall financial position when included in its financial projections. At the time of this report, clarity regarding the actual receipt, claiming and reporting required for receipt of the stimulus funds was not resolved and not included in any current fiscal projections.
- Recommend school formally **revise its Fiscal Policies** noting whenever interfund transfers or loans to other schools or entities are proposed, School Board approval be required via a Board Resolution.
- Continued pursuit of conversion to other vendor for purchasing Enrichment Ordering System.

Assigned District Staff Person: Shari Erlendson, ; Tyler Myers, ; Erica Corioso, and Krystin DeMonfonte,

Position of Assigned Staff Person: Deputy Executive Director, Director of Client Finance at Charter Impact, Executive Director

**PACIFIC COAST ACADEMY FISCAL AND BUSINESS SYSTEMS OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Budget, Accounting, and Financial Reporting</u></b>					
<u>F1</u>	Governing board policies address budget, accounting, and financial reporting.	X Board policies	<u>Yes</u>	<u>No</u>	Evidence provided. Board meeting held in August 2020 provided a Board Budget/Finance workshop for Board Members.
<u>F2</u>	Current budget has been approved by the governing board.	X Current/adopted budget X Board meeting minutes	<u>Yes</u>	<u>No</u>	
<u>F3</u>	Charter school has clear process for reviewing and revising the budget (e.g., in light of changes in student enrollment or operations), including governing board approval.	X Board meeting minutes, Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Each month the Board reviews monthly budget updates at regularly scheduled meetings. In addition, the Board formally approves the school’s Adopted Budget, 1 <sup>st</sup> Interim and 2 <sup>nd</sup> Interim reports during the school year.
<u>F4</u>	Charter school’s Learning Continuity Plan aligns with LCFF Calculator (applicable to 2020-21 school year only).	X Learning Continuity Plan X LCFF Calculator	<u>Yes</u>	<u>No</u>	Evidence provided

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<u>F5</u>	Budget provides for all financial obligations.	X Current budget (2 <sup>nd</sup> Interim Report, Balance Sheet)	<u>Yes</u>	<u>High</u>	Current budget provides for all financial obligations. However, prior year monies via receivables in Balance Sheet owed to the school in in dispute, still outstanding and unresolved after several months of negotiations/discussions. The disputed amount of monies owed the school from Inspire/Provenance/ThinkSuite is approximately \$2M.
<u>F6</u>	Governing board approves all required financial reports.	X Required financial reports X Board meeting minutes	<u>Yes</u>	<u>No</u>	
<u>F7</u>	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F8</u>	On or before December 15th, the charter school submits the interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F9</u>	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	X Proof of submission	<u>Yes</u>	<u>No</u>	
<u>F10</u>	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	X Proof of submission	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F11</u>	Charter school maintains separate accounts for restricted revenues and expenditures.	X Financial records. Alt SACS reporting	<u>Yes</u>	<u>No</u>	
<u>F12</u>	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports	<u>Yes</u>	<u>No</u>	Evidence provided. Formal review of cash flow projections occur minimally three times a year during Adopted Budget, 1 <sup>st</sup> Interim and 2 <sup>nd</sup> Interim reporting
<u>F13</u>	Charter school’s business accounting system complies with state accounting and reporting requirements.	X Director of finance (or equivalent) interview. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports	<u>Yes</u>	<u>No</u>	Accounting system complies to state reporting requirements
<b><u>Audit</u></b>					
<u>F14</u>	Charter school has selected a state-approved auditing firm, and annually submits independent auditor selection certification and contract to authorizer and county office of education by March 31st.	X Proof of submission of auditor certification and contract X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F15</u>	Charter school has developed auditing schedule/timeline.	X Auditing schedule/timeline	<u>Yes</u>	<u>No</u>	
<u>F16</u>	Charter school has submitted prior year’s financial audit to authorizer.	X Previous year’s audit X Proof of submission	<u>Yes</u>	<u>No</u>	Evidence provided. Report submittal deadline delayed to March 2021 due to State Auditor’s change to its guidelines

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F17</u>	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	Not Applicable. No Audit Findings	<u>Yes</u>	<u>N/A</u>	No Audit Findings in Audit Report
<b><u>Financial Condition</u></b>					
<u>F18</u>	Charter school maintains an appropriate level of reserves for economic uncertainties.	X Financial records. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Yes. School projects an Ending Balance for FY 2020-21 of \$3.9M which represents 9.4% of its total revenues projected for the year of \$41.7M
<u>F19</u>	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	X Financial records. MYP reports during Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports XD irector of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	Formal three-year financial projections submitted during Adopted Budget, 1 <sup>st</sup> and 2 <sup>nd</sup> Interim provide evidence of reasonable assumptions

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u> <u>High / Low /</u> <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F20</u>	Based on the projections, charter school will be able to meet its financial obligations and maintain an appropriate level of reserves in the current and two subsequent fiscal years.	X Financial records, Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim Reports X Director of finance (or equivalent) interview	<u>Yes</u>	<u>Low</u>	Based on its projections, the school will be able to meet its financial obligations with appropriate level of reserves in current and two future years. However, significant impact on school’s Balance Sheet is a concern due to the current dispute with Inspire/Provenance/ThinkSuite, regarding amount owed school. Current Balance Sheet figures do not yet included any adjustments for dispute while resolution on going. A positive offset to any potential negative impact of dispute is the school as yet has not included funding per SB 86 and ESSR II & III related to Stimulus Funding due to COVID-19 Pandemic. These funds should bolster the school’s overall financial position when included in its financial projections.
<b><u>Cash Receipts</u></b>					
<u>F21</u>	Charter school has policies addressing cash receipts.	X Cash receipt policy	<u>Yes</u>	<u>No</u>	
<u>F22</u>	Charter school maintains records of all monies received (e.g., issues receipts).	X Cash receipt policy X Sample records of cash receipts X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F23</u>	Charter school deposits monies in a timely manner.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F24</u>	Charter school maintains records of deposits of all monies.	X Cash receipt policy X Sample records of cash deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F25</u>	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	X Cash receipt policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F26</u>	Charter school’s board has adopted a resolution or formally approved any interfund transfers via the due to/due from process, which details all material facts related to such transfers.	X Board-adopted resolution and/or meeting minutes evidencing formal approval of interfund transfer(s).	<u>Yes</u>	<u>Low</u>	School has not experienced any interfund transfers this fiscal year. Issue related to prior year loans and interfund transfers is source of continuing dispute with Inspire/Provenance/ThinkSuite on monies owed the school. Recommend school formally <b>revises its Fiscal Policies</b> noting whenever interfund transfers or loans to other schools or entities are proposed, School Board approval be required via a Board Resolution.
<b><u>Disbursements</u></b>					
<u>F27</u>	Charter school has policies addressing disbursements.	X Disbursement policy	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F28</u>	Disbursements require all of the following: (1) an original invoice from the vendor; (2) a receiving document; (3) appropriate approval of the purchase; and (4) ratification by the governing board, if amount exceeds maximum dollar amount set forth in charter school policy.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F29</u>	Checks are signed by authorized employees.	X Disbursement policy X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F30</u>	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No / N/A</u>	
<u>F31</u>	Charter school has segregated duties between purchasing, receiving, and accounts payable.	X Staff organizational chart X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<b><u>Payroll</u></b>					
<u>F32</u>	Charter school has a salary schedule or other satisfactory salary structure.	X Salary schedule	<u>Yes</u>	<u>No</u>	
<u>F33</u>	Tax deposits are completed in a timely manner.	X Proof of tax deposits X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F34</u>	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	X Proof of recording of earnings X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F35</u>	Charter school has system to provide STRS data to authorizer.	X Proof of submission of STRS data X Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F36</u>	Charter school has system to maintain employee earning records for preparation of W-2s.	<input type="checkbox"/> Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F37</u>	Charter school adheres to provisions of any leased teacher/staff agreement or MOU, including invoicing for every leased teacher/staff member and Board approval of same.	X Prior year Leased Teacher/Staff Agreement X Evidence of Board approval of new Shared Admin Staff Agreement X No invoices required this year to date	Yes	<u>Low</u>	No Leased Teacher/Staff agreement or MOU exists for the current year. The school previously operated under a leased teacher MOU agreement between 14 charter schools in prior years. That agreement/MOU has expired. All “teachers of record” supporting the school’s students are employed by the school for FY 2020-21. This is a significant improvement for the school in regards to managing staffing and payroll. The school has implemented a Shared Admin Staff Agreement or MOU with two other Charter Schools for the current year administrative efforts. The current year Shared Admins Staff Agreement is well done, creative and reconcilable via an approved matrix of staff and related payroll.
<b><u>Equipment Inventory</u></b>					
<u>F38</u>	Charter school has policies addressing the purchase and maintenance of equipment.	X Equipment purchase and maintenance policy	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F39</u>	Charter school maintains an equipment inventory that is physically located on each site.	X Equipment inventory	<u>Yes</u>	<u>No</u>	
<u>F40</u>	Equipment purchased with federal funds is properly identified.	X Director of finance (or equivalent) interview. Alt SACS reporting	<u>Yes</u>	<u>No</u>	
<b><u>Student Attendance (All Schools)</u></b>					
<u>F41</u>	Charter school uses a generally approved attendance accounting system.	X Screenshot of attendance accounting system	<u>Yes</u>	<u>No</u>	
<u>F42</u>	There is a designated staff person responsible for administering attendance.	X Staff organizational chart, Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F43</u>	Charter school calendar includes a minimum of 175 instructional days.	X School calendar	<u>Yes</u>	<u>No</u>	
<u>F44</u>	Charter school class/bell schedule ensures minimum instructional minutes (36,000 for K, 50,400 for 1st - 3rd, 5400 for 4th - 8th, 64,800 for 9th - 12th).	X Class/bell schedule	<u>Yes</u>	<u>No</u>	
<u>F45</u>	Student absences are excluded from apportionment days.	X Attendance reports, student work samples, registers X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F46</u>	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	X Attendance reports, DCOT HR Lead interview X Attendance clerk (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F47</u>	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	X Proof of submission	<u>Yes</u>	<u>No</u>	Evidence provided. Current year “Hold Harmless” legislation due to COVID-19 Pandemic funds school at prior year ADA levels
<u>F48</u>	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F49</u>	Charter school has clear procedures for disenrolling students and providing notification to the student’s district of residence.	X Enrollment and disenrollment policies and procedures	<u>Yes</u>	<u>No</u>	
<u>F50</u>	Charter school has clear procedures for claiming and reporting ADA to the state.	X Policies and procedures related to claiming and reporting ADA. P1,P2,P3 attendance reporting	<u>Yes</u>	<u>No</u>	
<u>F51</u>	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	X Attendance clerk (or equivalent) interview.	<u>Yes /</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F52</u>	Any changes in enrollment/ADA from school year to school year are reasonable and do not exceed threshold under Operations MOU that would trigger the need for a material revision to the charter.	X Teacher roster and monthly ADA reports. Adopted Budget, 1 <sup>st</sup> & 2 <sup>nd</sup> Interim projections	<u>Yes</u>	<u>No</u>	
<b><u>Student Attendance (Schools Offering Independent Study)</u></b>					
<u>F53</u>	Charter school annually certifies independent study courses as being of the same rigor and educational quality as classroom-based courses, including information regarding instructional minutes, as required by Education Code section 51749.5(a)(4).	X Certification X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F54</u>	Teachers and students communicate in person, by phone, or by other live visual or audio connection at least twice per month, as required by Education Code section 51749.5(a)(7).	X Independent study coordinator (or equivalent) interview  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F55</u>	Charter school retains evidence of satisfactory educational progress for each independent study student, including a file of representative samples of each student’s work products (signed/initialed and dated by supervising teacher).	X Sample grade books X Sample transcripts X Work samples	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F56</u>	Charter school does not offer courses required for high school graduation or UC or Cal State admission exclusively through independent study, as prohibited by Education Code section 51749.5(a)(13).	X List of course offerings	<u>Yes</u>	<u>No</u>	
<u>F57</u>	The program of each student in independent study is overseen by a certificated employee.	X Student enrollment report X Staff organizational chart X DCOT HR Lead interview	<u>Yes</u>	<u>No</u>	
<u>F58</u>	Charter school meets ratio of ADA to FTE certificated employees required by Education Code section 51745.6(d) (i.e., 25:1 or ratio in largest unified school district).	X School ADA Reports X Staff organizational chart X Ratio Calcs Report	<u>Yes</u>	<u>No</u>	
<u>F59</u>	Governing board has adopted and implemented written policy regarding the maximum length of time (by grade level and type of program) that may elapse between independent study assignment and completion.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F60</u>	Governing board has adopted and implemented written policy regarding the number of missed assignments allowed before the school conducts an evaluation to determine whether student should remain in independent study.	X Board policy  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F61</u>	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	X Sample agreements  X Independent study teacher interview	<u>Yes</u>	<u>No</u>	
<u>F62</u>	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F63</u>	Charter school does not provide any funds or other things of value to students who attend independent study programs (or their parents/guardians) that it does not provide to students who attend classroom-based programs (or their parents/guardians).	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F64</u>	Charter school claims ADA only for students who are residents of the county in which the apportionment claim is reported, or who are residents of a county immediately adjacent to the county in which the apportionment claim is reported.	X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F65</u>	Charter school maintains daily/hourly attendance credit register (separate from classroom attendance records) on a current basis as time values of student work products are evaluated by certificated teachers.	X Credit register, student work samples X Independent study coordinator (or equivalent) interview X Independent study teacher interview	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low / No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<u>F66</u>	Charter school claims apportionment credit for independent study only to the extent of the time value of student work products, as personally judged in each instance by a certificated teacher.	X Credit register, student work samples X Independent study coordinator (or equivalent) interview	<u>Yes</u>	<u>No</u>	
<u>F67</u>	Pursuant to Education Code section 47634.2, charter school has submitted a determination of funding form, and SBE subsequently issued a determination of funding.	X Request for determination of funding X SBE determination of funding	<u>Yes</u>	<u>No</u>	

815-21/4810246.1

## **Pacific Coast Academy: Personnel**

### **Context**

The 20-21 Personnel Oversight Checklist Review compared to the 19-20 DCOT review for Pacific Coast Academy was a much easier and more efficient process. A new Director of HR, Celia Ewing, brought to the review quick and effective responses to requests needed for the review. 19-20 concerns were addressed in the 20-21 review in regards to the discrepancies in staffing lists. All areas of staffing review on the Oversight Checklist for 20-21 matched.

### **Compliance Area Concerns**

- This Low level of Concern was related to #P1 which relates to the MOU on Leased Teachers. For the 20-21 review a more accurate list of professionals with credentials was submitted and their support for students at Pacific Coast Academy Charter.

### **Best Practices**

- At the conclusion of the 19-20 oversight process, the parties agreed that new hires would be reported to the board, but no formal board approval would be required.



Assigned District Staff Person: Celia Ewing – Pacific Coast Academy Charter School  
 Position of Assigned Staff Person: Director of Human Resources

**PACIFIC COAST ACADEMY - PERSONNEL OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>All Employees</u></b>					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	X Employee handbook X Employee policies X Approved charter X Employment-related MOUs	<u>Yes</u>	<u>Low</u>	MOU for Leased Teachers. Shared Personnel staff with other Charters dated 7/1/20.
P2	Charter school employee handbook and policies guarantee fair hiring practices.	X Employee handbook X Employee policies	<u>Yes</u>	<u>No</u>	
P3	Charter school enters employment contracts with all persons hired to work at school.	X Sample employment contracts	<u>Yes</u>	<u>No</u>	
P4	All employees have been fingerprinted, including Department of Justice background checks.	X Documentation of fingerprint clearance for all employees	<u>Yes</u>	<u>No</u>	
P5	All employees have passed TB test and results are current.	X Documentation of current TB test results for all employees	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u> <u>Yes / No</u>	Level of Concern High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	X Certificates of training	<u>Yes</u>	<u>No</u>	
P7	If charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	X Certificates of training	<u>Yes</u>	<u>No</u>	31 Staff employees – completed training
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	X Observation of main office /website	<u>Yes</u>	<u>No</u>	19-20 observation on site review.  20-21 review – photos were submitted from HR office.
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	X Employee handbook	<u>Yes</u>	<u>No</u>	
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	X Employee handbook	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P11	Governing board approves personnel actions.	X Governing board minutes	<u>Yes</u>	<u>No</u>	At the conclusion of the 19-20 oversight process, the parties agreed that new hires would be reported to the board, but no formal board approval would be required.
<b><u>Certificated Employees</u></b>					
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	X Staff organizational chart X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operation MOU approved 12/11/20
P13	Charter school provides teachers with professional development opportunities.	X Professional development calendar X Professional development session agenda X Teacher interviews	<u>Yes</u>	<u>No</u>	Teacher interview 3/1/21
P14	Teachers providing instruction in core subject areas have the required credentials and certifications to meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of credentials and certifications held by core teachers X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 12/11/20
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	X Staff organizational ) X Documentation of credentials and certifications held by teachers	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>	<u>Level of Concern</u>  <u>High / Low /</u>  <u>No / N/A</u>	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
P16	Teachers providing special education and related services have required credentials and certifications.	X Staff organizational chart X Documentation of credentials and certifications held by special education teachers	<u>Yes</u>	<u>No</u>	
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	X Sample evaluations X Teacher interviews	<u>Yes</u>	<u>No</u>	Teacher interview completed 3/1/21
<b><u>Classified Employees</u></b>					
P18	Classified employees who provide instructional support in core subject areas, special education, and English language learning meet state and federal requirements, terms of approved charter, and any MOUs.	X Staff organizational chart X Documentation of qualifications held by classified aides X Approved charter X Operations MOU	<u>Yes</u>	<u>No</u>	Operations MOU approved 12/11/20

# Pacific Coast Academy: Educational Program & Student Services

## Context

Pacific Coast Academy is a tuition-free, public charter school serving transitional kindergarten through 12th grade students in San Diego, Orange, Riverside, and Imperial Counties. The virtual/independent study school serves approximately 4000 students, grades TK – 12 with offices located in San Diego County. The Senior Directors are in charge of the Educational Programs of the various programs.

## Compliance Area Concerns

### 2020 Concerns

- Pacific Coast Academy has successfully addressed all Educational Program and Special Education issues from the prior year's oversight findings.

### E15 - Low

The first concern is a Low Level Concern regarding #E15 which relates to the Charter school administering state-mandated testing according to testing rules and regulations as required for all K-12 schools in California. In 2019 less than 90% of enrolled and eligible students participated in state testing. With COVID-19 restrictions and exceptions this has been a challenging criterion to meet.

### E16 - Low

The second concern is a Low Level Concern related to #E16 which relates to the Charter school SBAC and Dashboard Data indicating that the Charter school is on target for meeting renewal requirements as set forth in EC 47607. Current documentation for 2019 indicates that all subgroups scored below the statewide average on ELA and only one subgroup (ELL) scored above the state level in mathematics.

### E36 - Low

The third concern is a Low Level Concern related to #E36 which relates to the Charter school providing for the screening of pupils' vision, hearing, screening for scoliosis, and required immunizations. Current documentation confirms that immunizations are required for students who participate in in-person learning. Screening for scoliosis and vision is not provided.

## Best Practices

- E15: Increase/maintain state testing participation at or above 90% of eligible students.
- E16: Develop and implement a plan to support all student subgroups in meeting or exceeding the statewide average for performance on the ELA and Math portions of state testing.
- E36: Follow up on the legal requirement for providing both scoliosis and vision screening for students and provide documentation as to status.

Assigned District Staff Person: Krystin Demofonte  
 Position of Assigned Staff Person: Executive Director

**PACIFIC COAST ACADEMY - EDUCATIONAL PROGRAM AND STUDENT SERVICES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Educational Program - Pacific Coast Academy</u></b>					
E1	Charter school curricular and instructional plan complies with approved charter.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence	<u>Yes</u>	<u>No</u>	Flexible homeschool program
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	X Approved charter X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Variety of courses, flexible, a-g are identified in handbook
E3	Charter school staffing complies with approved charter.	X Approved charter X Staffing chart	<u>Yes</u>	<u>No</u>	Staffing chart provided appears to comply with approved charter
E4	Charter school staffing is sufficient to carry out educational program.	X Staffing chart • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No /</u>	
E5	If applicable, parents of high school students are informed about the transferability of courses to other public high schools and the eligibility of courses to meet college entrance requirements.	X Student handbook	<u>Yes</u>	<u>No</u>	Provide in handbook and mentioned in petition

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E6	Charter school has obtained WASC accreditation, if applicable.	X WASC accreditation	<u>Yes</u>	<u>No</u>	Accreditation for 6 years received 2019; good through 2025 with a mid-cycle revisit
<b><u>Services to Special Populations</u></b>					
E7	Charter school follows process for identification and reclassification of students who are English Learners.	<ul style="list-style-type: none"> <li>X Student handbook</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Process outlined in petition. HLS survey provided.
E8	If charter school graduates students, it has notified students in foster care, homeless students, and students of a military family or with migrant status of their rights of exemption from local graduation requirements.	<ul style="list-style-type: none"> <li>X Student handbook</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Not in the handbook. Need verification of this.  Letter template provided
E9	Charter school policies and practices ensure referral and assessment of students suspected of needing accommodations under Section 504.	<ul style="list-style-type: none"> <li>X Student handbook</li> <li>X Charter policies and procedures manual</li> <li>X CALPADS reports for Fall 1 submission</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	504 not addressed in student handbook  504 mentioned on page 28, 31-33 of petition  Samples of 504 plans provided

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E10	Students identified as eligible under Section 504 receive accommodations and supports required by their 504 plans.	X Sample 504 plans • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Pages 31-33 of petition Sample plans provided
<b><u>Curricular Materials</u></b>					
E11	Charter school uses standards-aligned instructional materials.	X Description of courses, instructional framework, and/or scope and sequence • Classroom observations	<u>Yes</u>	<u>No</u>	All choices listed on the website
E12	Charter school uses instructional materials that address the specific needs of English Learners.	X Description of courses, instructional framework, and/or scope and sequence • Instructional leader (or equivalent) interview • Classroom observations	<u>Yes</u>	<u>No</u>	Addressed in LCP
E13	Charter school provides integrated English Language Development within regular classes in all content areas in a manner that is aligned with state content and ELD standards.	• Instructional leader (or equivalent) interview • Classroom observations	<u>Yes</u>	<u>No</u>	Evidence provided
E14	Charter school provides designated English Language Development for a specific protected time during the school day that is aligned with ELD standards.	X Class schedule • Instructional leader (or equivalent) interview • Classroom observations	<u>Yes</u>	<u>No</u>	Addressed in LCP



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Assessment</u></b>					
E15	Charter school administers state-mandated testing according to testing rules and regulations as required for all K-12 schools in California.	<ul style="list-style-type: none"> <li>X Assessment calendar</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>Low</u>	Less than 90% of students tested in 2019
E16	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607.	<ul style="list-style-type: none"> <li>X SBAC</li> <li>X Dashboard Data</li> </ul>	<u>Yes</u>	<u>Low</u>	All ELA subgroups below state performance Only ELLs above state level in math Very borderline at this time
E17	Charter school has completed and timely posted a SARC containing required elements.	X SARC	<u>Yes</u>	<u>No</u>	
E18	Charter school regularly collects student achievement data and reports it to parents and staff.	<ul style="list-style-type: none"> <li>X Sample data reports to parents</li> <li>X Sample data reports to staff</li> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Samples provided
E19	Charter school provides required notifications of language proficiency assessments (ELPAC), including whether a child is a long-term English Learner or is at-risk of becoming one.	<ul style="list-style-type: none"> <li>X Notifications/letters to parents</li> <li>X Home language surveys</li> </ul>	<u>Yes</u>	<u>No</u>	Redacted samples provided

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E20	Charter school has a Learning Continuity Plan (2020-21 school year only). LCP has been presented to, reviewed, and approved by the Charter school’s Board.	X LCP X Minutes from Board meeting	<u>Yes</u>	<u>No</u>	
E21	Learning Continuity Plan addresses student academic performance across all student populations.	X Review of LCP	<u>Yes</u>	<u>No</u>	
E22	Title I funds/categorical funding are being used to supplement the school’s LCP goals.	<ul style="list-style-type: none"> <li>• LCP</li> <li>• Director of finance (or equivalent) interview</li> </ul>	Yes	<u>N/A</u>	
E23	As applicable, the charter school has completed a School Plan for Student Achievement (SPSA) that meets federal school planning and stakeholder requirements for Title I for the 2020-21 school year.	<ul style="list-style-type: none"> <li>• SPSA</li> </ul>	N/A	N/A	N/A
E24	The charter school has complied with the programmatic requirements for the development and implementation of a school site council (including composition, meetings, etc.) if it receives federal funding under Title I.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> <li>• School site council handbook</li> <li>• Membership lists</li> <li>• Meeting notices/agendas and minutes</li> </ul>	N/A	N/A	N/A

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Admissions</u></b>					
E25	Charter school complies with the admissions practices described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>Low</u>	2 military students enrolled from out of state - Kitsap County, WA  61 Imperial Cty, 221 Orange Cty, 176 Rvsd Cty, San Berdo 3, 3807 San Diego Cty,  Verified that per Ed Code section 48204.6. children of military families applies to the above identified students.
E26	Admissions process for a student with an IEP is the same as for a student without an IEP.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	Per petition, yes
E27	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	X Charter school student data X Student data from nearby school districts	<u>Yes</u>	<u>No</u>	Enrollment data analysis showing comps to other charter schools. The Dehesa comparison numbers include Dehesa chartres and not just the Dehesa LEA.  Data is comparable to other similar programs

No.	Compliance Area	Evidence to Review [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E28	Charter school enrollment forms indicate compliance with all applicable laws, including prohibition on collecting information regarding immigration status; prohibition on collecting social security numbers unless required by law; and, as required by Education Code section 49452.9(a), health care coverage options and enrollment assistance information.	X Admissions/enrollment forms and policies	<u>Yes</u>	<u>No</u>	No enrollment form provided. These is a lot of this info in the handbook  Enrollment forms requested and provided
E29	If charter school has used lottery system to determine which students will be allowed to enroll, process was held in the manner described in the approved charter.	X Approved charter X Admissions/enrollment forms and policies X Lottery procedures	<u>Yes</u>	<u>No</u>	See question below  Not ever used
<b><u>Discipline</u></b>					
E30	Charter school discipline policies and practices are consistent with terms of charter.	X Approved charter X Discipline policies and procedures, including policies regarding discipline of students with disabilities	<u>Yes</u>	<u>No</u>	Policies addressed in petition
E31	Student discipline procedures comply with due process requirements set forth in Education Code section 47605, charter, and/or discipline policies and procedures, including all requirements for disciplining students with disabilities.	X Discipline policies and procedures, including policies regarding discipline of students with disabilities • Instructional leader (or equivalent) interview	<u>Yes</u>	<u>No</u>	Policies addressed in petition

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E32	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	<ul style="list-style-type: none"> <li>X Discipline data</li> <li>X Discipline policies and procedures, including policies regarding discipline of students with disabilities</li> </ul>	<u>Yes</u>	<u>No</u>	Difficult to compare IS charter with seat based schools . Rates are low for suspension and expulsion for PCA
<b><u>Health and Safety</u></b>					
E33	Charter School has and annually updates its school safety plan, addressing fire emergencies, earthquakes, criminal incidents, accidents, injuries, and other threats to the health and safety of students and staff, consistent with Education Code requirements.	X School safety plan	<u>Yes</u>	<u>No</u>	Does not included updated COVID-19 protocols
E34	Staff has been trained in health, safety, and emergency procedures, and appropriate first aid supplies are kept on hand.	<ul style="list-style-type: none"> <li>X Training sign-in sheets</li> <li>• Observation of main office</li> </ul>	<u>Yes</u>	<u>No</u>	List provided
E35	Charter school has a policy/procedure for visitors to enter and leave campus.	<ul style="list-style-type: none"> <li>• Policy or procedure</li> </ul>	Yes	<u>N/A</u>	
E36	Charter school provides for the screening of pupils’ vision, hearing, screening for scoliosis, and required immunizations.	<ul style="list-style-type: none"> <li>• Records of student screenings</li> </ul>	<u>Yes</u>	<u>Low</u>	Not provided - per legal counsel.

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E37	If charter school serves students in grades 7-12, governing board has adopted Suicide Prevention Policy that was created in conjunction with stakeholders, specifically lists its high-risk groups, addresses the needs of those high-risk students, and was updated in the last 5 years.	X Suicide Prevention Policy X Board meeting minutes	<u>Yes</u>	<u>No</u>	Policy should include Board approval date on it  Provided board approval date
E38	If charter school qualifies for FRPL for all meals that it provides, it has applied to provide a universal meal service to all students at the school, or, if not, has submitted a governing board resolution to the state claiming a fiscal hardship (with evidence that those finding are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> <li>• Application for universal meal service</li> <li>• Board resolution</li> </ul>	N/A	<u>N/A</u>	
E39	Charter school provides at least one meal per day to students who qualify for FRPL, except as provided for nonclassroom-based programs.	<ul style="list-style-type: none"> <li>• Executive director (or equivalent) interview</li> </ul>	<u>N/A</u>	<u>N/A</u>	
E40	Charter school posts on its website in a prominent, conspicuous location, the Title IX information, including the name and contact number/e-mail for the Title IX Coordinator for that school.	X Screenshot from website	<u>Yes</u>	<u>No</u>	Yes, on website

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E41	If charter school serves students in grades 7-12, it provides comprehensive sexual health and HIV prevention education, as required by Education Code section 51930, et seq.	X Sexual health and HIV prevention education course description	<u>Yes</u>	<u>No</u>	
E42	Charter school has developed methods for informing parents/guardians of students in grades 6-12 regarding human trafficking prevention resources, as required by Education Code section 49381.	X Policy or other description of method for informing parents/guardians	<u>Yes</u>	<u>No</u>	Yes, on website
<b><u>Parent Notifications</u></b>					
E43	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	X Notice	<u>Yes</u>	<u>No</u>	In handbook
E44	If charter school serves students in 11th grade, parents of those students are notified by January 1st that the students will be deemed a Cal Grant applicant unless the student opts out, as required by Education Code section 69432.9(d)(1).	X Notice	<u>Yes</u>	<u>No</u>	

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E45	If charter school serves students in 12th grade, parents of those students are notified of student’s GPA by October 1st, as required by Education Code section 69432.9(c)(2).	X Notice	<u>Yes</u>	<u>No</u>	
E46	Charter school notifies parents at least twice a year regarding how to initiate access to available student mental health services on campus or in the community.	XNotice	<u>Yes</u>	<u>No</u>	Unknown about notification but info is on website
<b><u>Student Records</u></b>					
E47	Charter school maintains comprehensive records regarding its students.	X Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number	<u>Yes</u>	<u>Low</u>	2 military students enrolled from out of state - Kitsap County, WA  61 Imperial Cty, 221 Orange Cty, 176 Rvsd Cty, San Berdo 3, 3807 San Diego Cty,  Explanation provided per Ed Code section 48204.6.
E48	Charter school maintains student records, including special education records, in a confidential and secure location.	X Policy regarding confidentiality of student records • Observation of main office	<u>Yes</u>	<u>No</u>	Records office is indicated on website and in materials provided
E49	Charter school has a policy or procedure for parents to review student files, including a log.	X Policy regarding review of records	<u>Yes</u>	<u>No</u>	In handbook



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
E50	Charter school has policy or procedure regarding release of student information.	X Policy regarding release of student information	<u>Yes</u>	<u>No</u>	In handbook
E51	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> <li>• Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Thru SEIS and SIS

# Pacific Coast Academy: Special Education

## Context

Pacific Coast Academy (PCA) is authorized by the Dehesa School District but is its own independent local education agency (LEA) member of the El Dorado Charter Special Education Local Planning Area (SELPA) for special education purposes and is solely responsible for implementing all state and federal special education requirements and for complying with all applicable laws and regulations pertaining to students with disabilities and in accordance with Education code Section 47641(a). The MOU between PCA and Dehesa School District was approved on July 1, 2017 and will end on June 30, 2022.

Pacific Coast Academy is an independent study program. Special education supports and services are provided based on a student's Individualized Education Program (IEP). Both formal and informal assessment measures are utilized to measure and monitor student progress and assist in making data driven decisions related to instruction, goals and services. Students enrolled at PCA receive their special education services virtually through one on one or small group sessions with a credentialed education specialist. Related services, such as, speech and language therapy, occupational therapy, etc., are provided by an approved non-public agency (NPA). PCA serves students of all levels, including those with moderate/severe disabilities, requiring more individualized supports.

The enrollment process for students with disabilities follows the same process as general education students, however, additional steps are put into place to ensure students receive the necessary supports. The El Dorado County Charter SELPA provides a comprehensive procedural manual for special education in order to comply with the requirements of the Individuals with Disabilities Education Act (IDEA). Upon initial enrollment, the IEP is reviewed by the special education director or coordinator to ensure appropriate services are provided. The team then reviews the IEP and student performance within the first 30 days (30-day interim) to make adjustments to the IEP or recommendations as needed.

The PCA Parent and Student manual that is available online outlines a clear referral process for when the general education team or a family has concerns related to a student's academic performance. PCA utilizes a student study team (SST) process in which the home school teacher (HST) works with parents to put interventions in place and monitor progress over a period of 6-8 weeks. The SST team consists of the home school teacher (GE teacher), intervention teachers and parents. Should the student require additional intervention, the SST refers to the PCA assessment team.

Students identified as eligible for special education services have access to the full range of services as indicated by their IEP. The sampling of IEP's submitted for review demonstrate that all required members of the IEP team were present and participated in the meeting. SELPA policies indicate clear timelines in accordance with the Individuals with IDEA and the California Department of Education (CDE). Service accountability is documented via an excel spreadsheet and is regularly reviewed by the special education director or coordinator.

According to data from November 2020, PCA does not enroll a disproportionate number of students with disabilities compared to that of the state average. The identification rate of 10.92% for special education was determined using the CALPADS enrollment of 4,283 and SEIS counts of 468. This is consistent with the 2020 state average of 11.7%. Discipline data from 2018-2019 (most recent available due to Covid), data provided indicate that there were no suspensions for students with disabilities. There is no change to the CPA State Accountability data for 2019-2020. Due to COVID-19, all state assessments were suspended, and measures continue to be taken from 2018-2019 data.

## Compliance Area Concerns

- Low Levels of Concern are addressed in Best Practices below.

## Best Practices

- Consider developing a Special Education Procedural manual that is specific to PCA as some procedures may differ from that of the El Dorado SELPA.

Assigned District Staff Person: John Egnor, Jennifer Fenati  
 Position of Assigned Staff Person: SpEd Director, Assistant SpEd. Director

**PACIFIC COAST ACADEMY - SPECIAL EDUCATION OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Special Education Program</u></b>					
S1	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	all students admitted; 30 day review meeting to determine appropriateness of placement  SELPA manual provided, but no policy and procedure manual specific to PCA
S2	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	SELPA and Charter policies indicate process for identifying and evaluating students  SELPA manual provided, but no policy and procedure manual specific to PCA
S3	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> <li>• Student handbook X Charter/SELPA policies and procedures manual</li> <li>• CALPADS reports for Fall 1 submission X Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	Timelines indicated in SELPA procedural manual follow that of IDEA  SELPA manual provided, but no policy and procedure manual specific to PCA

No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted? Yes / No	Level of Concern High / Low / No / N/A	Findings/Comments [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
S4	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<input checked="" type="checkbox"/> Sample IEPs <ul style="list-style-type: none"> <li>Instructional leader (or equivalent) interview</li> </ul>	<u>Yes</u>	<u>No</u>	IEP service logs, IEP services connect to IEP goals
S5	All required members of IEP teams attend IEP meetings.	<input checked="" type="checkbox"/> Sample IEPs	<u>Yes</u>	<u>No</u>	Required members participated in IEP meetings
S6	Charter school does not enroll a disproportionately small number of students with disabilities.	<input checked="" type="checkbox"/> Data demonstrating percentage of students with disabilities in charter school	<u>Yes</u>	<u>No</u>	Percentage of students enrolled with a disability- 10.92% (11/2020) Consistent with 2020 state average of 11.7%
S7	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	<input checked="" type="checkbox"/> Director of finance (or equivalent) interview	<u>Yes</u>	<u>No</u>	504 supports are not provided using sped funding or sped staff.
S8	Board and charter school administration are aware of and familiar with the terms of the special education MOU between the District and the charter school.	<input checked="" type="checkbox"/> Special Education MOU <ul style="list-style-type: none"> <li>Review of agenda and minutes</li> <li>Board President interview</li> </ul>	<u>Yes</u>	<u>No</u>	MOU approved by district-11/19/20; board meeting minutes not attached
S9	Charter school has fulfilled its obligations under the MOU, including the submission of any required documentation to the authorizer.	<ul style="list-style-type: none"> <li>Records of authorizer</li> </ul>	<u>Yes</u>	<u>No</u>	

## **Pacific Coast Academy: Facilities/Operations**

### **Context**

Pacific Coast Academy (PCA) is taking steps to leave Provenance charter management organization and has been in a transition over the 20.21school year. The COVID pandemic has made the transition difficult; the virtual independent study school serving grades TK-12 has its administration, tech support, and storage located at 13195 Danielson St #100 & #200 Poway, CA 92064. PCA also has a resource center/independent study school serving students grades K – 8 and is located 102 Baker St Costa Mesa, CA in Orange County. Baker St has shut down due to COVID restrictions. Also, PCA had planned on having other sites at Frazee and Regus Rd to support the needs of their students, but that was not completed.

### **Compliance Area Concerns**

- The Notice of Concerns related to the 19-20 Oversight Report were addressed by the COVID precautions which shut down the 102 Baker St., Costa Mesa Resource Center. Not using Baker St Center alleviated the facility requirements for that site.

### **Best Practices**

- Continue to improve

Assigned District Staff Person: Krystin Demofonte/ Shari Erlendson  
 Position of Assigned Staff Person: Executive Director/ Deputy Executive Director

**PACIFIC COAST ACADEMY - OPERATIONS AND FACILITIES OVERSIGHT CHECKLIST**

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Maintenance of Facilities</u></b>					
O1	A designated person is responsible for overseeing operations and facilities management.	X Staff organizational chart	<u>Yes</u>	<u>No</u>	There are positions but few names with them
O2	Facilities are adequate for number of students and types of programs.	<input type="checkbox"/> Capacity chart for campus facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview	<u>No</u>	<u>N/A</u>	Statement saying these are not campus facilities with all students in virtual independent study.  Baker St resource center was closed this year due to COVID
O3	Charter school has process for routine inspections of grounds to ensure that they remain in good condition and free from mold and other hazardous substances.	<input checked="" type="checkbox"/> Inspection logs <input checked="" type="checkbox"/> Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	For Danielson St and Baker St

No.	Compliance Area	Evidence to Review  [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
<b><u>Legal Compliance</u></b>					
O4	All facilities meet Americans with Disabilities Act requirements.	X ADA certification	<u>Yes</u>	<u>No</u>	
O5	All single-user restrooms have been designated as all-gender restrooms.	X Operations manager (or equivalent) interview	<u>No</u>	<u>No</u>	Observed in Poway
O6	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan	<u>No</u>	<u>N/A</u>	Danielson St is modern (2006) construction.
O7	Charter school has certificate of occupancy on file.	X Certificate of occupancy	<u>Yes</u>	<u>No</u>	
O8	Charter school has conditional use permit on file, as applicable.	X Conditional use permit	<u>No</u>	<u>No</u>	The Poway fire inspection includes a “permit to operate”.

No.	Compliance Area	Evidence to Review  [ <u>Note</u> : The charter school may be asked to provide additional documentation for any of the compliance areas.]	Submitted?  Yes / No  [Indicate N/A if applicable.]	Level of Concern  High / Low / No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O9	Charter school has safety inspection by local fire department on file.	X Safety inspection by local fire department	<u>Yes</u>	<u>No</u>	Danielson St and Baker St are submitted. This includes permit to operate.
O10	If charter school participates in an interscholastic athletic program, it has a written emergency action plan and at least one automated external defibrillator for the school.	X Emergency action plan X Operations manager (or equivalent) interview	<u>Yes</u>	<u>N/A</u>	
O11	If charter school serves any grades 6-12, and meets the 40% pupil poverty rate, it provides feminine hygiene products, including tampons and sanitary napkins, in a least 50% of the school’s restrooms.	X Operations manager (or equivalent) interview	<u>No</u>	<u>N/A</u>	Virtual Independent Study and COVID precautions preclude this requirement.
O12	If charter school is aware of a lactating pupil, it has made accommodations for lactation other than a restroom and has provided a place to safely store milk.	X Operations manager (or equivalent) interview	<u>No</u>	<u>N/A</u>	Virtual Independent Study and COVID precautions preclude this requirement.
O13	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	X Certificates of insurance	<u>Yes</u>	<u>No</u>	



No.	Compliance Area	Evidence to Review [Note: The charter school may be asked to provide additional documentation for any of the compliance areas.]	<u>Submitted?</u>  <u>Yes / No</u>  <u>[Indicate N/A if applicable.]</u>	Level of Concern  High / Low /  No / N/A	Findings/Comments  [Required for a “No” response to the “Submitted?” category. Also required for a “High” or “Low” response to “Level of Concern” category.]
O14	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1, as recently amended by Assembly Bill 1507.	<input checked="" type="checkbox"/> Operations manager (or equivalent) interview <input checked="" type="checkbox"/> Designation of any charter facilities (e.g., resource centers, etc.) <input checked="" type="checkbox"/> Review of addresses of facilities	<u>Yes</u>	<u>No</u>	
O15	Charter school has identified all facilities and their respective locations, including those that are available for use by students enrolled in the charter school for any purpose related to the charter school’s educational program (whether or not such facility(ies) is/are owned, leased, rented, or subleased by the charter school or a different entity).	<input checked="" type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview	<u>Yes</u>	<u>No</u>	
O16	Charter school has not added or begun using any new or different facilities that are not identified in the most recent charter petition or material revision (as applicable) approved by the District’s governing board.	<input checked="" type="checkbox"/> List of facilities <input checked="" type="checkbox"/> Operations manager (or equivalent) interview <input type="checkbox"/> Authorizer records	<u>Yes</u>	<u>No</u>	

# **Dehesa Charter Oversight Report**

**Charter  
Response  
Letters**

May 26, 2021

Bradley Johnson, Superintendent/CBO at Dehesa School District

re: Method Schools SDSA Review Response

Dear Bradley,

At Method Schools, we wanted to thank you for your committed focus and ongoing relationship as our authorizer now and during the transitional period surrounding your placement. We have greatly appreciated the transparency and guidance since you've filled the position and have benefitted greatly from a more structured and comprehensive oversight process.

Each year, we continue to improve to better serve our employees, students and their families. We found the annual review process with SDSA to be improved this year and hope for it to get better each year as well. While we have found their process to be valuable in identifying areas to improve, we also hope that it can gravitate towards a process that demonstrates more of an oversight approach, rather than one that has felt somewhat like a performance review.

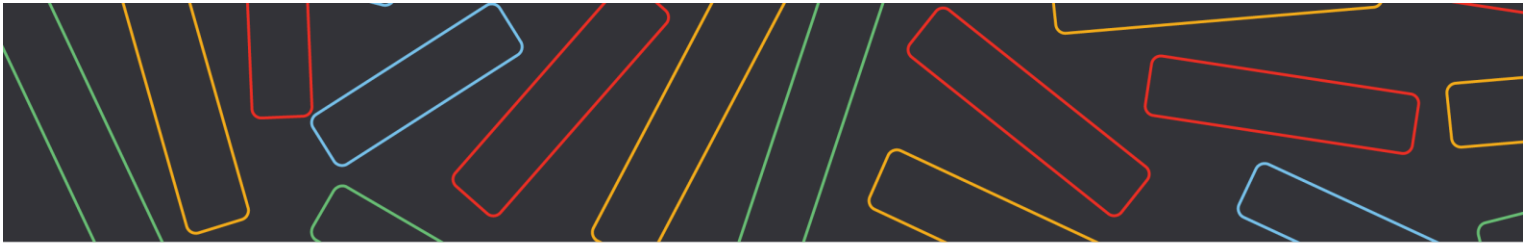
Moving into our eighth year of operation, we have grown and the committee has helped us to identify areas within our operations and governance that can grow as well. We look forward to these growth changes and a continued relationship with you, your Board, and SDSA.

Thank you again for your support to our program and its continual growth.

A blue, handwritten signature that appears to read "Dr. Jessica Spallino".

Dr. Jessica Spallino  
Founder & CEO





June 1, 2021

Bradley Johnson  
Superintendent/CBO  
Dehesa School District  
4612 Dehesa Rd.  
El Cajon, CA 92019

Re: Diego Hills Central Public Charter School Response to 2020-21 SSDA Oversight Report

Dear Superintendent Johnson,

We would like to thank you, the Dehesa School Board, and the Small School District Association for conducting the Annual Oversight for Diego Hills Central Public Charter School. Many of the processes were streamlined this year, including virtual document sharing and virtual meetings with committee members, leading our team to find the Oversight process much smoother this school year. We appreciated sharing documents via Google Drive which expedited the sharing process and improved communication between our school and the oversight team. We also found the SSDA committee members to be thorough in their work and we appreciate the feedback to help us grow in the future.

Compared to the SSDA Oversight Report from the 2019-2020 school year, the feedback for 20-21 is minimal and the team has already begun addressing many of the suggestions within the report.

Our team is especially proud of our growth in the Governance portion of the Oversight Report. We appreciate that SSDA recognized the effective leadership of our Board President, and we will continue to build capacity in our team in the years ahead to ensure a robust governance structure is in place to guide school decision-making.

As always, thank you for the District's continued support of Diego Hills Central and we look forward to continuing our successful partnership with the District.

In gratitude,

Lindsay Reese  
Area Superintendent

Cc: Dehesa School Board and SSDA



Dear Mr. Johnson and The Oversight Team,

Thank you for providing our Oversight Report for the 20-21 school year. We are extremely pleased to see the improvements the school has made over the last year. It has been a pleasure to work with the oversight team, and we have gained invaluable knowledge from each of them. We hope to continue to improve our processes, educational program, and school with the feedback provided to us.

This year has brought about many changes for our school. Our main focus has been to complete our separation from ICS. We have worked tirelessly to build internal capacity and independent operations, and all decisions are made locally by the board and school stakeholders. This has been an enormous undertaking, but we realize that it is important for the school to continue to develop local control.

We read through all sections of the report and have noted some steps that we will be working to improve on. Cabrillo Point Academy will create a complaint form that will be directed back to the school instead of only to our authorizer. Another area that we continue to work on yearly is to improve our state mandated testing numbers. We strive to go above and beyond all requirements, and this is evident in our students completing the Star360 as well as the CAASPP testing, which was not required this school year. It is important to us to consistently use student data to drive student achievement.

We enjoyed working with the oversight team throughout this process and look forward to working with you in the future. We feel that this process has strengthened our relationship with Dehesa School District, and are grateful for our continued partnership.

Thank you,

*Jenna Lorge*



Jenna Lorge  
Senior Director  
Cabrillo Point Academy  
☎ (951)741-4376  
🌐 [www.cabrillopoinacademy.org](http://www.cabrillopoinacademy.org)



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We read through all sections of the report and have noted some steps that we will be working to improve on. Pacific Coast Academy will create a complaint form that will be directed back to the school instead of only to our authorizer. Another area that we continue to work on yearly is to improve our state mandated testing numbers. We strive to go above and beyond all requirements, and this is evident in our students completing the Star360 as well as the CAASPP testing, which was not required this school year. It is important to us to consistently use student data to drive student achievement.

We enjoyed working with the oversight team throughout this process and look forward to working with you in the future. We feel that this process has strengthened our relationship with Dehesa School District, and are grateful for our continued partnership.

Thank you,

*Krystin Demofonte*



Krystin Demofonte  
Executive Director  
Pacific Coast Academy  
☎ (858) 442-0887  
🌐 [www.PacificCoastAcademy.org](http://www.PacificCoastAcademy.org)