

Dehesa Charter Oversight Report

June 24, 2020

**Prepared by SSDA's Dehesa
Charter Oversight Team
(DCOT)**

for Dehesa School District



Small School Districts' Association

925 L Street, Suite 1200
Sacramento, CA 95814
Tel: (916) 662-7213
Fax: (916) 443-7468
www.ssda.org

EXECUTIVE COMMITTEE

Dr. Amy Alzina, Superintendent
Cold Spring Elementary School District

Eric Bonnicksen, Superintendent
Placerville Union Elementary SD

Dr. Helio Brasil, Superintendent
Keyes Union Elementary SD

Marie Caldwell, Superintendent
Scott Valley Unified School District

Dr. Kathleen Granger, Superintendent
Mountain Empire Unified School District

Linda Irving, Superintendent
Sebastopol Union Elementary SD

Dr. Nancy Lynch, Superintendent
Reed Union School District

Mike Martin, Superintendent
Modoc County Office of Education

Brett McFadden, Superintendent
Nevada Joint Union High School District

Stuart Packard, Superintendent
Buttonwillow Union Elementary SD

Jeremy Powell, Superintendent
Hamilton Unified School District

Dr. Catherine Reimer, Superintendent
San Ardo Union Elementary School District

Terri Rufert, Superintendent
Sundale Union Elementary SD

Toby Wait, Superintendent
Big Creek Elementary School District

SSDA FOUNDERS

Dr. Don Brann, Founder
Dr. David Evans, Founder, 1932-2018
Ray Edman, Founder, 1926-2006

SSDA OFFICE

Timothy J. Taylor, Executive Director
(916) 662-7212; tim@ssda.org

Corrie Pelc, Director of Member Services
(916) 662-7213; corrie@ssda.org

May 1, 2020

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

Dear Superintendent Johnson,

In January 2020, the Dehesa School District (District) and the Small School Districts' Association (SSDA) entered into an Independent Contractor Agreement for Professional Services for Charter School Oversight. Using the Dehesa Charter Oversight Documents, this oversight was performed by SSDA's Dehesa Charter Oversight Team (DCOT) for the five charter schools currently authorized by the District. The overall purpose of the DCOT was to implement the District's oversight process to improve the Dehesa School District oversight of their authorized charter schools by evaluating the risk to the District and addressing ways to reduce that risk.

The District's oversight materials include the master charter oversight checklist, site visit/program observation checklists, and interview questions to provide detailed review of the charter schools in the following areas; educational programs/special education services; governance; finance/business; personnel; and facilities/operations.

SSDA assembled some of the most knowledgeable and respected charter authorizer specialists from throughout California, who all worked in tandem to write this report and create a model oversight system for the District. Toward the end of the interviews and visits phase, the COVID-19 pandemic reduced the ability to visit sites a little, but online visits continued the collection of data to evaluate the risk level that the charter schools presented to the District. The Report is the compilation of an immense amount of time and effort directed toward developing a focused picture of the different charter schools currently authorized by the District.

SSDA appreciates the opportunity for its DCOT to serve the District, and wants to thank all the District and charter school staff for the great cooperation and assistance that made this Report possible. As a valued SSDA Member, the Dehesa School District can continue to count on the support of the Small School Districts' Association.

Sincerely,

Timothy J. Taylor
Executive Director
Small School Districts' Association

Table of Contents

Introduction

Background	4
Scope and Process of Oversight	4
Dehesa Charter Oversight Team	5

Charter School Reports

The Heights Charter	8
Method School	66
Diego Hills Central	128
Inspire Charter Schools Authorized by Dehesa	197
Cabrillo Point Academy	200
Pacific Coast Academy	269

Introduction

Background

According to Education Code 476000 et seq., charter school authorizers must fulfill certain minimum oversight requirements. This 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 multi-pronged 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 will need to be reviewed and updated on an annual basis to ensure they align with any new legal requirements. Also, because the 2019-2020 school year will be the first time this oversight process has been implemented, the materials may need to be revised or adjusted to address any practical, logistical, or other considerations prior to the upcoming school year.

To implement the process, the District joined in 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 process. The SSDA created a Dehesa Charter Oversight Team (DCOT) of experts whose background is provided under the **"Dehesa 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 several transitions of District leadership, including two interim superintendents and a new superintendent/Chief Business Officer. The District, DCOT, and charter school staff are also to be commended for their flexibility in the pursuit of improving the oversight of the District's charter schools.

Scope and Process of Oversight

Using the District's Dehesa Charter Oversight Documents, the DCOT 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 DCOT in the following five principal areas during the 2019-20 school year:

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

To begin the process, the District requested from the charter schools a series of documents showing compliance in these five principal areas. In the second phase of the process, the DCOT conducted a detailed compliance review of each set of charter school documents requested by the District. In the third phase,

the District arranged site visits for the DCOT to meet with key charter school personnel, 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 by risk level. Due to the COVID-19 pandemic, the visits toward the end of this phase took place online. Considering that the majority of these schools operated in virtual environments, this was a fairly easy adjustment to the oversight process.

In the fourth phase, the DCOT wrote draft reports rating each charter school's compliance in the five principal areas based on the risk assessment tool included at the end of each checklist. The risk assessment tool wasn't designed as a definitive indication of compliance or lack of compliance; it was used to help the DCOT measure the compliance level of risk for each document by selecting "Yes" or "No," and totaling the numbers of each to reach a risk assessment of LOW, MODERATE, or HIGH. However, the checklist items were not weighted; there were instances, especially in Governance and Finance/Business, where the charter school's risk level is technically "low" based on the scoring tool, but the compliance areas that include "no" responses are significant and warrant follow-up or intervention. These were sometimes also given an "Overall Assessment" risk level.

The DCOT then prepared draft reports of compliance for each charter school, including findings for each of the areas under evaluation. The reports also described, with specificity, any improvement recommendations, corrective action(s), and/or needed follow-up to address the compliance-related issues. These draft reports were then provided to the charter schools to review the portions relevant to their school.

In the fifth phase, the District considered any feedback from the charter schools and in its sole discretion made any appropriate changes to the report 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 specified proposed reasonable recommendations or corrective actions to be taken by the charter school, and the deadlines for submitting evidence of compliance to the District.

The oversight assessment was factual in nature and the report is not intended to provide any legal conclusions that are strictly in the jurisdiction of law enforcement or the courts.

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 37 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.

Linda Kimble, Ed.D, Educational Program Lead

Linda Kimble has served as a superintendent for 16 years in urban, rural, and suburban school district settings ranging in size from small (1,500) to large (20,000). She led Acton-Agua Dulce Unified School District, Keppel Union School District, Monrovia Unified School District, Anaheim Elementary School District, and most recently Vista Unified School District.

Dr. Kimble has written two books on instructional leadership — one from the lens of the principal, and another from the lens of the superintendent. For each book, she studied almost 100 leaders and gleaned their knowledge to share with the field of education.

Instruction has been the core of Dr. Kimble's work. In her role as superintendent, she has made instructional oversight and research-based instructional leadership a key component of her work. No matter how large or

small the district, Dr. Kimble made school visits a priority each week in order to stay connected to the classrooms she served.

Prior to her work as a Superintendent, Dr. Kimble was an Assistant Superintendent of Curriculum and Instruction, a Principal, Assistant Principal, bilingual coordinator, trainer for teachers obtaining bilingual certifications, and the founding principal of a dual immersion school.

JoAnn Murphy, M.Ed., Special Education Lead

JoAnn Murphy is a specialist in the field of special education. Over her 44-year career in public education she has been an educator, Executive Director of Special Education/SELPA Director for the Poway Unified School District. Ms. Murphy currently serves as a special education consultant for the Fiscal Crisis Management Assistance Team (FCMAT) during the past 12 years. Throughout that time, the FCMAT Team has completed over 90 studies in special education throughout California.

Ms. Murphy is the owner and operator of Strategic Consultation for Schools, LLC, which has provided 32 customized studies in special education to school districts, county offices, and SELPAs throughout California. Additional supports have also been provided in the areas of Administrative Coaching, Professional Development, Curriculum and Instruction, Achievement Monitoring, and Compliance, and Complaint Investigations for OCR/CDE complaints in districts.

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

Through 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 Dehesa Charter Oversight Team.

Dehesa Charter Oversight Report

The Heights Charter

The Heights Charter: Governance

Context

The Heights Charter is a single small charter school governed by the seven-member board of a non-profit corporation called The Heights Charter (incorporated in 2012). The school is not part of a network and does not contract with a charter management organization, although some back-office functions are provided by an outside vendor. Although still listed by CDE as an independent study charter, the school is operating currently as largely site-based.

Concerns

- The board includes the current (and founding) director of the school as a voting member and board president. She and two other members of the board have received payments from the organization (according to IRS Form 990) contrary to the bylaws and conflict of interest principles. Although permitted by recent changes in statute with specific conditions, employee representation is greater than best practice would support. This undercuts the ability of the board to hold school leadership accountable for the school's performance.
- Irregularities in selection process for board: no nominating committee (per bylaws), with the director elected for a term of one year rather than two years specified in bylaws.
- Evaluation process for school director not consistent with school policy. Evaluation was verbal, during a board closed session. No evidence of any setting of objectives or written report by the board. Policy for evaluation was updated in early 2020.
- Minutes of the previous year reveal limited board engagement with financial reporting.
- Conflict of interest policy and policy for students with disabilities (IDEA/504) not provided. School reports policies currently under review.
- Parent engagement process to advise the governing board described in charter (Parent Advisory Council) is in operation, although most recent minutes show very limited membership/attendance. Not clear what role the PAC plays in governance.
- Board observation included evidence of the school director's dominance, with the board chair being coached throughout by the director. The chair did not know what was on the agenda, nor was she familiar with procedure for discussion and voting. The meeting was held by videoconference, which may have caused some confusion, but the coaching extended beyond the technology.
- Is the organization operated and governed effectively?
 - * The school has had stable leadership and governance, which has supported the school through recent transitions.
- Is the school meeting public policy purposes?
 - * Weak school leader evaluation, the seating of the school director as a voting board member, limited community engagement in governance, and inadequate online information regarding governance are contrary to basic public policy purposes of transparency and accountability.

Oversight Checklist Risk Assessment: Low

Overall Risk Assessment: Moderate

Recommendations

- School director should be removed from the board and a process put in place for recruiting, electing and training board members and officers. The process should include engagement with the school community and training should include instruction on school finance.
- School website should be expanded to include more governance documents, more information about the board members, and information on the authorizer.

- Bylaws should be updated to be consistent with current legal requirements and such other changes as the organization may have made in its governance function.
- School policies need to be updated and customized to the actual operations and circumstances of the school.

The Heights Charter: Finance/Business

Context

Due to the sheer volume of items (65) to be reviewed in this section, a scoring system using a formula from the number of “no” responses may not reveal the true risk assessment of a given charter. From a strict formula calculation perspective, a score of less than 25% “no” responses or (0.5 out of 65) indicates an **Oversight Checklist Risk Assessment of LOW** for the charter school. Other charter schools reviewed as part of this process required an additional **Overall Risk Assessment** due to responses received and additional in-depth data/information analysis review for understanding of reported information. An Overall Risk Assessment was not required for The Heights Charter School due to the clarity, straightforward reports and processes discovered during the review.

During the interviews/conversations held via conference calls on March 5, 2020, the review process began with an interview with Sandra Morgan, Business Manager of the charter school. During the interview it was noted Sandra was very knowledgeable in charter school accounting, fiscal reporting and budgeting. Sandra is a staff member of the school as an hourly employee. The school utilizes QuickBooks for nonprofits as its accounting system. The school by design keeps its enrollment at low levels (approx. 250 students), with only one class per grade. After the interview with Sandra, a conference call was held with Diana Whyte, Director of the charter school, Debra Cramsie, Assistant Director of the charter school, and Cynthia Free, Personnel Lead of the DCOT. During the interview it was noted of the director’s passion and knowledge of every aspect of the program. The school attempts to keep enrollment steady at approximately 250 students to ensure the highest quality of education for the program.

Concerns

- Co-Founder/Director is motivated and passionate and knowledgeable of every component of the Charter. Concern regards a replacement plan for the Director if she should leave the school.
- School Business Manager intends to retire at the end of the current school year. As is the case with the Director of the school, a concern exists regarding how the charter school replaces the position and scope of work required with a similar knowledge base of charter school accounting, budgeting and fiscal reporting.
- Review of attendance/ADA claiming revealed a 100% ADA yield to enrollment. In essence, the school is reporting 100% attendance for every student. The class registers, student work samples reviewed by teaching staff, and attendance claiming documents provided as samples for review met a compliance check of the claiming processes. This component review consisted of process review. Concern regarding whether or not a 100% ADA yield to enrollment was reasonable was forwarded to the Educational Program Lead of the DCOT for further review of the appropriateness of the ADA claiming 100%.

Oversight Checklist Risk Assessment: Low

Recommendations

- Plan for leadership transition

The Heights Charter: Personnel

Context

The Heights Charter is a small K-8 school in east San Diego County. For the 259 students, onsite classes are small. There are 14 students that are in an independent study program. These students also join in on enrichment workshops and onsite classes when possible. All current teachers have appropriate California credentials to provide instruction in their assigned areas. All oversight checklist requirements such as TB, DOJ, AB1433 and anti-harassment have been met with all staff. The teacher interview process provided a personal insight to the dedication and responsibility towards The Heights' learning program. It was evident that there is a shared respect for the Director and a comradery felt among the teaching and support staff that work there.

Through my observation and discussions at the site visit, the Executive Director showed that she is a greatly motivated and a compassionate leader, and the main person who oversees all charter functions. She is the only person who is 100% in control of ALL aspects of the daily processes of the school, including teaching classes herself. In conversation with the Executive Director, it was mentioned that she might retire soon and she was moving towards the Special Education teacher to step in to her role.

Concerns

- The Executive Director and Special Education teacher have more than full positions with their respective responsibilities
- P-11 Governing Board does not approve personnel actions
- P-14 Music teacher only has a 30-day permit
- P-15 Four teachers did not have the required EL authorization. The Heights Charter Director stated that they only had two students requiring EL services and they are placed with EL authorized teachers. – Verified. Director will follow up with teaching staff without EL authorizations to complete these requirements.

Oversight Checklist Risk Assessment: Low

Recommendations:

- Both the Director and Special Education teacher have more than a fulltime position with their respective responsibilities. The recommendation is that there be a plan in place to appoint or hire a certificated staff member to assist the Director in the daily functions of the charter to ensure a smooth transition.
- It is also recommended that an additional certificated special educator be hired to assist in the daily functions of the special needs students.

The Heights Charter: Educational Program

Context

The Heights Charter is located in Alpine, California. This school provides flexible instructional options, which include the spectrum from full-time homeschooling to full day, full-time instruction. Most students attend school each day of the four-day week, but about 10% of the students have chosen to be fully homeschooled. Another small group of the students that varies in size chooses to attend school one or more days a week, but not full time. Instructional options vary, but are fairly traditional. Teaching and learning is standards-based. There are some digital options, but software does not drive instruction.

When students at The Heights are fully homeschooled, parents play a much larger role in their instruction. The 14 students in this situation have dedicated teachers who focus on homeschooling, and meet regularly

with both the parent and the homeschooled student. Students who attend school during the day are taught by teachers, with parents playing an assisting role in the learning of the student. For this group of students, the teachers believe it is their role to teach the students directly; not through the parents.

In interviews conducted with parents, students and teachers, there was a great deal of positivity toward The Heights Charter. Both parents who homeschooled and parents who did not said their children were receiving a high-quality education. Teachers were positive about their experiences at The Heights Charter and spoke highly of the education being provided at the school.

Data

Assessments:

Overall, students at The Heights Charter perform well on State and local assessments. The Heights performance on the 2019 dashboard shows 143 students tested in English Language Arts achieved 29.2 points above standard, maintaining their progress from the prior year. Mathematics scores for 2019 for the 143 students tested were 9.3 points below standard, also maintaining progress from the prior year.

Two CAASPP eligible students did not take the CAASPP. One “opted out” and the Director believes the other was ill. Only 1.6% of the 244 students are English learners. By comparison, in Dehesa and its charters, the total rate of English Learners is 4%.

Informal Assessments

- The school uses a variety of informal assessments. A reading assessment monitors for instructional level, accuracy and comprehension.
- They measure and monitor reading levels for all students, which trend toward the high end. For example, second graders trended toward early to mid-third grade as a group on a recent instructional reading level assessment. The same students had high levels of accuracy and comprehension. Included in the informal assessments are the guided reading lesson records, which are skill-based.
- Rubrics are used to measure student progress in writing.
- In mathematics, students are assessed for skill mastery and conceptual understanding.

Demographics:

The large Caucasian population (82%) does not reflect the demographics of the local school district or the chartering agency. Only 12% of the students are socioeconomically disadvantaged. There are statistically few Hispanic and African American students, compared with the chartering District, County and State. The closest elementary school is Boulder Oaks Elementary (BOE) located in the same community as The Heights Charter. Their student population is 19.4% Hispanic, compared with The Heights Charter at 15.7% Hispanic. BOE is 1.5% African-American compared with The Heights Charter at 1%. Since The Heights Charter is located in the town of Alpine, these statistics may be more reflective of the area demographics than the comparison to Dehesa as a whole.

Concerns

- No major instructional concerns.
- Instructional continuity and the impact of attending school vs. homeschool in student outcomes could become problematic at The Heights Charter. In a sample of 14 TK students in a given week, 10 students were at school all four days M-Th. The remaining four students were in school a variety of days, from one day to three of the four days in attendance. There is great flexibility in this instructional model, which is popular with parents.

- In an interview, the Principal said, “We have to be careful to call this a resource center because we are located in a district other than our charter authorizer.” It was noted that the majority of students attend school at this location four days per week for the full day as measured by attendance information provided by the Director.

Oversight Checklist Risk Assessment: Low

Recommendation

- The Heights Charter teachers should remain mindful of the gaps that can be created in student learning and performance when students miss content other students are receiving, especially when one group is taught by a highly qualified teacher in a classroom setting and another group is learning at home.

The Heights Charter: Special Education

Considering the many regulations and unique metrics used to assess risk for Special Education issues, the format for this section of this Oversight Report will also be unique; instead of the Recommendations coming at the end of this report, each area identified with an underlined heading will have a follow up **Corrective Action** statement.

Context

The Heights Charter is authorized by the Dehesa School District and functions as a public school within the District for special education purposes. Students with disabilities access the full continuum of programs and services available as a member of the East County Special Education Local Plan Area (SELPA). Student programming onsite consists of Specialized Academic Instruction (SAI) and/or related services of special education. No students are served outside the school at this time.

Data

- Annual Performance Report (California Department of Education, Special Education Division – The Heights Charter (2018-19) This report is required by Individuals with Disabilities Education Improvement Act of 2004 (IDEA) (20 U.S.C. 1416(b)(2)(C)(ii) and 34 CFR 300.602) for all local education agencies including school districts, county offices of education and charter schools. There are 17 indicators that measure data relative to the complaint implementation of federal law in multiple areas such as statewide assessment, graduation rate, discipline, least restrictive environment, disproportionality, and IEP compliance. This document will serve as reference within the body of the report for each charter school for which Dehesa is reviewed and is available online at www.cde.ca.gov/sp/se/ds/leadatarpts.asp.
- California School Dashboard
- Memorandum of Understanding: Dehesa School District and The Heights Charter School (2012-2017)
- Special Education Student Information — SEIS is a web-based system that allows centralized, online access to the Individual Education Plan for all students, the management of that date, CALPADS reporting and service tracking. Its maintenance and operation are funded by the East County SELPA.

State Assessment

It is important to note that in some of the required measures, the number of students served at the Local Education Agency level can be too small for meaningful calculations. The Heights has no achievement measures for either the math or English language arts due to a sample too small for measurement. The Annual Performance Report (2018-19) had set a specific special education target of >95% participation in both English language arts/math. The Heights had a participation rate of 84.21% in math and 89.47% in English language arts. A monitoring activity referred to as (Performance Indicator Review) was assigned to The Heights be-

cause of the failure to meet the target in participation rate for 2018-19. A PIR designation requires the school to analyze the root cause of the low participation rate in statewide assessments and to develop an implementation plan.

The district has developed the root analysis and implementation plan as required for the PIR 2018-19 in coordination with the East County SELPA and school site staff. They have identified the need to encourage parent participation on the importance of the statewide testing and student participation.

Corrective Action in progress: The school has revised practices to include advance notification for parents of students with disabilities, as well as transportation options such as carpooling. It was submitted to CDE special education.

The Director reported that the district has achieved 100% in the spring testing for 2019 with verification available through the California Dashboard. The district should also receive a written verification from CDE once this issue in the Annual Performance Measure is resolved.

Disproportionality

Based on data used for 2018-2019 from the California School Dashboard, The Heights does not enroll a disproportionately small number of students with disabilities compared to its enrollment. The identification rate of 15.9% for special education was determined using the CALPADS enrollment (244) and SEIS enrollment (39) for The Heights, while the identification rate for students with disabilities in the Dehesa district is 14.5%.

CALPADS data reflects that the EL and Socioeconomic Disadvantaged population in The Heights (EL 1.6% and Socioeconomic Disadvantaged 11.9%) are not reflective of the Dehesa School District (EL 10.9% and Socioeconomic Disadvantaged 56.2%). The EL population in the Alpine School District is EL5.7% and Socially Disadvantaged 32 %. The additional analysis of the Alpine School District continues to support the finding on disproportionality.

The enrollment process is open to all students regardless of EL status, Socioeconomic Disadvantage or students with disabilities.

Corrective Action: Raise awareness in the community and through the webpage that enrollment is open to all students.

Policies and Procedures

The last Memorandum of Understanding between the Dehesa School District and The Heights Charter dated 7/12 and signed on 2/15 expired on June 30, 2017. Following this report from the DCOT, the district should examine the current MOU and determine if any areas such as compliance for special education need to be enhanced or specified.

The district does not have a procedural handbook for special education. Informal compliant practices are in place for students enrolling in the school with an active IEP. Timelines for compliance with referral, initial assessment, triennials and annual IEPs are reported timely in Items #15-17 on the Annual Performance Plan. There is overall concern over the lack of formalized procedures in special education around enrollment with an active IEP, referrals for assessment, timelines for compliance, etc. While it is working very efficiently now and established undefined practices are in the hands of experienced staff, that could change overnight when changes of staff could occur.

Corrective Action:

- The district should update the MOU between The Heights and Dehesa.
- Consider tightening some of the MOU language for accountability in procedures and compliance areas.
- Formalize procedures in writing for enrolling students with disabilities, providing direction on the need for the IEP and coordination with general education.
- Formalize procedures in writing for the referral and assessment process, either through special education or 504.

IEP Timelines/Compliance

The team conducted an unannounced review of 138 IEPs in the Special Education Information System and found a solid foundation of compliance with special education timelines consistent with requirements of federal law.

The reviewer did not find evidence that the Service Tracker was used in SEIS to document the provision of services as outlined in the IEP for each student, nor was there evidence of a service log. The district must have some mechanism for documenting that the services outlined in the IEP were actually provided. At the present time, IEPs are verified with approximately 29 amendments that will need to be finalized. These changes were needed due to program adjustments required with the coronavirus pandemic and the needs to change program delivery. Parents have agreed to the temporary change in services, but amendments must be verified.

Corrective Action:

- Use Service Tracker in SEIS or create a district process for documenting and verifying that services on the IEP are provided.
- Ensure that all IEP amendments are signed by parents consistent with procedures during the COVID-19 period.
- Ensure that progress notes on grade reports confirm the delivery of services.

Staffing

Special Education staffing credentials were verified through the Commission on Teacher Credentialing. The district uses one staff person with multiple credentials to serve two days per week as a school psychologist and three days per week as a teacher providing specialized academic instruction. She also coordinates Student Study Teams and 504 referrals and assessments. On the PIR document submitted to CDE she is also listed as the Director of Special Education.

All other related services such as occupational, speech and language therapy are provided either through the East County SELPA or through a certified nonpublic agency. These are typical service delivery options in special education and used frequently due to shortages of available qualified staffing in these areas.

Corrective Action:

- The entire program delivery system for assessment, specialized academic instruction, Student Study Team, 504, and other duties centers around one FTE. This practice should be re-evaluated and ensure that the assignments are realistic and that services are provided consistent with the IEP process.

Suspension/Expulsion

The Annual Performance Report indicated the Discipline Rate is <2.76% in the district and meets the criteria established for discipline. There are no instances of suspension or expulsion of students with disabilities.

Student Records

Student records are stored in a confidential and secure location. All IEPs are maintained within the SEIS system and available only with a confidential identification and password. All teachers have access to the records for students with disabilities through SEIS. We did not have access to any written policies on the review of records or release of student information.

Oversight Checklist Risk Assessment: Low

The Heights Charter: Facilities/Operations

Context

Established in 2012, The Heights Charter 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 few areas of concern. The location is outside Dehesa’s boundaries, but The Heights charter was renewed prior to July 1, 2020, meeting recent legislative adjustments to EC 47605 until 2023.

Concerns

- Does not have certificate of occupancy as per their legal counsel’s advice.
- Conditional Use Permit for Resource Center is in process with County.

Oversight Checklist Risk Assessment: Low

Recommendation:

Follow up and monitor both concerns.



The Heights Charter

May 29, 2020

Via Electronic Mail
Bradley.johnson@dehesasd.net

Bradley Johnson, Superintendent
Dehesa Elementary School District
4612 Dehesa Road
El Cajon, CA 92109

RE: Necessary Revisions to Draft Dehesa Charter Oversight Report

Dear Superintendent Johnson:

I am in receipt of your letter dated May 22, 2020, in which you described and included the draft report entitled, "Dehesa Charter Oversight Report," prepared by the Dehesa Charter Oversight Team ("DCOT") of the Small School Districts' Association ("SSDA"), dated May 1, 2020. In your letter, you invited The Heights Charter (the "Charter School") to provide, if we wished to, a written response or comments to the draft report by May 29, 2020. We appreciate the opportunity, and based on this invitation, I provide you our responsive comments to the draft report.

In the draft report, there are some helpful, actionable recommendations that The Heights Charter appreciates, and we will implement appropriate changes. We were gratified that DCOT concluded in almost all instances that The Heights Charter is a "low" risk. Regrettably, there are also a number of concerns or recommendations where facts are not explained in full, actual operations are not acknowledged, and factual inaccuracies exist. I will respond to these concerns and recommendations in summary.

GOVERNANCE

Draft Report Concern: The Director of the school is a voting member and President of the Board which is "contrary to the bylaws and current conflict of interest laws." (Page 9)

Response: SB 126 (2019) enacted Education Code Section 47604.1, which became effective January 1, 2020, and allows for charter school employees to be on the Board if they "abstain from voting on, or influencing or attempting to influence another member of the governing body regarding, regarding all matters uniquely affecting that member's employment." Therefore, the law does explicitly allow for an employee to be on the Board. The current Bylaws do restrict the Board to having no "interested persons" on the Board. The Heights Charter will review this issue and determine the appropriate action going forward.

We ask that the report be modified to remove the inaccurate statement that the Board membership is contrary to conflict of interest laws.

Draft Report Concern: "Minutes reveal limited board engagement with financial reporting." (Page 9)

Response: The Heights Charter Board of Directors are actively and regularly engaged with the finances of the Charter School. In fact, three Board members have financial backgrounds, including the Chairperson who works for Edward Jones and two other Board members who own small businesses. It is unclear from the draft report which meeting minutes were reviewed that led to this hasty and inaccurate conclusion, but a complete study of the Board's actions and approach to fiscal oversight would not have concluded with such a finding or concern. The Heights Charter is committed to reviewing its meeting minutes format for areas of improvement, although there are no legal requirements governing the level of detail in Board meeting minutes.

It is vital that this unsupported and inaccurate concern is removed from the final version of the report.

Draft Report Concern: "Board observation showed the extent of the school director's dominance, with the board chair being coached throughout by the director. The chair did not know what was on the agenda, nor was she familiar with procedure for discussion and voting." (Page 9)

Response: The DCOT member who wrote this section of the report attended only one The Heights Charter Board meeting, and that one meeting happened to be the first virtual Board meeting conducted following the Shelter in Place Executive Order by Governor Newsom. The Heights Charter Board Chairperson was not personally familiar with the website platform used for the virtual meeting, while I had recently attended a training specifically on the topic of holding such meetings. Attendance of that lone, virtual meeting may indeed have given the impression that I provided considerable assistance to the Chairperson or that the Chairperson struggled during votes and comments, but such a finding or concern based on the first virtual Board meeting is incomplete and misleading. Justin Cunningham, a member of the DCOT, had attended an earlier, in-person Board meeting and had commented on how well it was conducted. The facts here are not explained in full and lead to inaccuracies.

Additionally, the Board updated Policy E2140: "Evaluation of the Director" in January of this year. The policy provides performance objectives for the Director including; relations with the Board, personnel matters, and success with the instructional program, operations, and community relations. This type of objective evaluation does not show "dominance" of the Executive Director over the Board members.

Having yourself lived through the sudden virtualization of all of our interactions, I'm sure you can relate to the challenges of a first videoconference meeting. **Because the conclusion is not representative of reality, and does not match the DCOT team lead's observation, we ask that it be removed from the report.**

FINANCE/BUSINESS

Draft Report Concern: *There is no succession plan for the Director or Business Manager.* (Page 10)

Response: The Draft Report fails to acknowledge that The Heights Charter has an Assistant Director who assists both the Executive Director and the Business Manager. As the Assistant Director, Nicole Van Shura Jones is learning all aspects of operating a charter school and can be prepared when retirements occur, which is not planned for anytime in the near future.

Additionally, The Heights Charter had previously contacted CharterWise, an audit firm that specializes in schools, to assist with business functions subsequent to our Business Manager's retirement. The Board of Directors has approved this agreement with CharterWise and it begins July 1, 2020.

Because there is no legal requirement for a succession plan, and because The Heights Charter has an Assistant Director, we ask that this concern be removed from the report.

PERSONNEL

Draft Report Concern: “*The Executive Director and Special Education teacher have more than full positions with their respective responsibilities.*” (Page 11)

Response: As mentioned above, the report fails to mention The Heights Charter has an Assistant Director to help lighten the Executive Director’s load. Furthermore, the report fails to mention the Special Education teacher has three teachers working for her that support the program. **We ask that this conclusion is removed from the report because it is inaccurate and irrelevant.**

Draft Report Concern: “*Music teacher only has a 30-day permit.*” (Page 11)

Response: The Charter Schools Act allows for this assignment through June 30, 2020 (and extends flexibility in credentialing until June 30, 2025 for teachers who were employed by charter schools during the current school year). The Heights Charter recognizes the change in the law brought about by AB 1505 beginning July 1, 2020, and will take appropriate action regarding teacher credentialing. **We ask that this conclusion is removed from the report because it suggests a legal standard that does not apply to the facts.**

EDUCATIONAL PROGRAM

Draft Report Concern: *In an interview, the Principal said, “We have to be careful to call this a resource center because we are located in a district other than our charter authorizer.”*

Response: This was taken out of context. The reason the director made this statement is because the oversight person kept calling this “site” a school which is legally inaccurate. (Page 13)

We ask that this be removed from the report because the entire textual conversation was not included to explain why the director would make such a statement. Their location is legally a Resource Center.

Draft Report Recommendation: “*The Heights Charter teachers should remain mindful of the gaps that can be created in student learning and performance when students miss content other students are receiving, especially when one group is taught by a highly qualified teacher in a classroom setting and another group is learning at home.*” (Page 13)

Response: The Heights Charter teachers are very aware of the potential disparity between the ways students learn. Additionally, the highly qualified teacher requirement was written out of the law in 2016. As noted earlier in the report, the Charter School’s program offering choice for parents is very popular. The report fails to note CAASPP scores for our students are better than most surrounding schools in the area, and we are extremely proud that our homeschool and classroom-based students score at comparable levels to one another.

This editorializing, as it is speculative and not indicative of reality, must be removed from the report.

SPECIAL EDUCATION

Draft Report Corrective Action: *The Heights Charter should “(r)aise awareness in the community and through the webpage that enrollment is open to all students.”* (Page 14)

Response: The Heights Charter does provide outreach on our website and in the community to offer enrollment to all students. Additionally, we are aware of new legal requirements regarding recruiting English learners and students with disabilities. The Draft Report cites data showing “disproportionality” with the Charter School’s enrollment numbers of special education students, English learners, and socioeconomically disadvantaged

students. What the report fails to note is that The Heights Charter’s attendance numbers in these student subgroups are demographically similar to the community in which the Charter School is located.

Because the Charter School is pursuing compliance with new legal requirements in this area, we ask that this conclusion be removed from the report.

Draft Report Corrective Action: “Use Service Tracker in SEIS or create a district process for documenting and verifying that services on the IEP are provided.” (Page 15)

Response: This is not mandatory, nor is it common for school districts to create this process. For instance, Cajon Valley School District, a large local traditional school district, does not have such a process.

Draft Report Corrective Action: “Ensure that all IEP amendments are signed by parents.” (Page 15)

Response: Such amendments are currently out for signature via DocHub. Once The Heights Charter receives signed amendments, they will be affirmed and attested via SEIS. This circumstance was caused by COVID-19 and the need for distance learning.

Because the Charter School is taking action due to unusual circumstances, we ask that this Corrective Action recommendation be removed from the report.

Draft Report Corrective Action: “The entire program delivery system for assessment, specialized academic instruction, Student Study Team, 504, and other duties centers around one FTE. This practice should be re-evaluated and ensure that the assignments are realistic and that services are provided consistent with the IEP process.”

Response: The one FTE is supported with three credentialed teachers: one 20%, one 40%, and one 60%. Additionally, the FTE is supported with one 20% paraprofessional, one full-time Special Education Instructional Aide, and one full-time Special Circumstances Instructional Aide.

This Corrective Action is based on inaccurate and incomplete information and we ask that it be removed from the report.

GENERAL INACCURACIES THROUGHOUT THE REPORT

The report includes factual misstatements and inaccuracies. I will share a few of the more concerning statements.

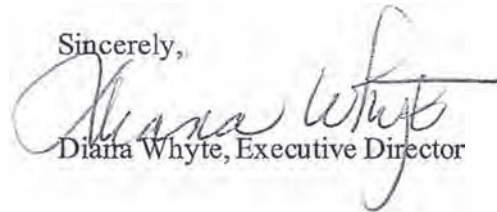
1. “...back office functions such as finance are provided by an outside vendor” (Page 9)
 - Only Paychex is an outside vendor. The Heights Charter has a Business Manager, Sandra Morgan, who is an employee.
2. “...the school is operating currently as largely site-based.” (Page 9)
 - The Heights Charter’s operations are not largely site-based. As you know, Independent Study charters may offer on-site classes, but that does not make the school “site-based.” The Heights Charter has been audited annually for the past seven years as an independent student charter school with no findings.
3. “Debra Cramsie” is the “Assistant Director of the charter school” (Page 10)
 - Debra is our Coordinator of Office/Business Services. Additionally, in the personnel section, it states The Heights Charter does not have an assistant director. As mentioned above, that is incorrect.

4. *“Per policies, disbursements require invoice, receiving document, appropriate approval, and ratification by governing board if amount (\$2,500) exceeds maximum dollar amount set forth in policy”* (Oversight Checklist F-26)
 - The maximum dollar amount for such circumstances is \$5,000.
5. *“Considering Heights is outside Dehesa’s boundaries, geographic and site limitations are not met but the renewal until 2013 is in place.”* (Comments under Legal Compliance of Oversight Checklist)
 - The current charter is through 2023. **Done**

In conclusion, The Heights Charter would like to thank you and the Dehesa Elementary School District for providing this draft of the Oversight Report. As I mentioned in the outset, there are several areas where the DCOT provide helpful guidance and suggestions for improved operations at our Charter School. However, we feel a response to some of the recommendations and concerns is necessary, along with related revisions to the report. I appreciate the opportunity to provide such input in the process.

We would also like to note that The Heights Charter has, since its creation, had seven annual, independent, financial audits, all that resulted in no findings or exceptions. The educational offerings at The Heights Charter continue to fill a significant need for parents and students in our community, and we do so with impressive educational results.

Sincerely,



Diarra Whyte, Executive Director

The Heights

The Heights: Governance

BINDER 3: GOVERNANCE DOCUMENTATION THE HEIGHTS			
Tab	Description	Compliance Area(s)	Provided?
1.	Articles of Incorporation	G1	Y (2012)
2.	Bylaws	G1-G4, G6, G12	Y (2012)
3.	Approved Charter	G3, G6, G8, G12	Y
4.	Most Recent School Leader Evaluation	G5	N – Verbal 8/2018 (no notes)
5.	List of Board Members	G7-G8	Y
6.	Board Member Biographies	G9-G11	Y
7.	Description of School and Community Demographics	G9	N (community only – school from CDE)
8.	Completed Form 700s for Board Members and Leadership	G11	Y
9.	Annual Board Meeting Calendar	G12	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Tab	Description	Compliance Area(s)	Provided?
10.	Sign-in Sheet(s) from Brown Act Training	G13	Y
11.	Three Most Recent Board Meeting Agendas	G14-G15	Y
12.	Screenshot of Website with Posted Agenda	G14	Y
13.	Public Comment Description/Policy	G15	Y
14.	Three Most Recent Board Meeting Minutes	G16	N (only 2)
15.	Screenshot of Website with Posted Minutes	G16	Y
16.	Board Meeting Minutes Reflecting Review of Compliance with Education Code Section 49431.9 (Prohibiting Food/Beverage Advertisements)	G17	N
17.	Parent Handbook	G18	Y
18.	Student Handbook	G18	Y
19.	Employee Handbook	G18	Y
20.	Complete Set of Board Policies	G19-G30, G39	Y (in process of updating; policies provided from 2014 need updating, customizing)
21.	Memorandum of Understanding	G38	Y (MOU has lapsed; no new one from Dehesa)

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:
 Gail Greely and Justin Cunningham
 Position of Assigned Staff Person:
 DCOT Governance Lead and Project Lead

THE HEIGHTS CHARTER GOVERNANCE OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Organizational Management</u>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	x Articles of Incorporation (Binder 3, Tab 1) x Bylaws (Binder 3, Tab 2)	X		
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	x Bylaws (Binder 3, Tab 2)	X		Appears not to be following bylaws for election of board members and officers (nominations by committee, Art. VII, Sec. 6); some updates to bylaws needed (incl. interested persons on board, and records)
G3	Any changes to charter or bylaws have been approved by charter school's governing board and submitted to the authorizer.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) X Approved charter (Binder 3, Tab 3)	X		Confirmed that bylaws received were most recent; no changes in bylaws made since 2012; no information on what documents were provided to authorizer, but MOU did not require submission
G4	There is a clear distinction between responsibilities of governing board and administration.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	School director is a voting member of the board, currently serving as its President, which muddies responsibilities; not considered best practice for nonprofits; contrary to bylaws provided, which bar interested persons from serving; Board does not appear to approve personnel actions

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G5	Governing board has a robust process for evaluating the charter school leader.	x Most recent charter school leader evaluation (Binder 3, Tab 4)		X	Verbal evaluation 18 months ago held in closed session in connection with compensation; insufficient notes or documentation to evaluate quality of review but was not consistent with adopted policy; director recused herself.
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"> x Bylaws (Binder 3, Tab 2) x Approved charter (Binder 3, Tab 3) x Executive director (or equivalent) interview (Binder 1, Tab 3, Q2) <input type="checkbox"/> Teacher interview (Binder 1, Tab 4, Q1) 		X	Charter says parents encouraged to serve on the board (no specific process); Parent Advisory Council is to advise the board; PAC is in operation, but not mentioned on webpage; from minutes provided, membership and participation are small; advisory role in governance not clear
Composition					
G7	Charter school has a list or roster of governing board members.	x List of board members (Binder 3, Tab 5)	X		No information on governing board members on website; no contact info for board
G8	Composition of governing board is consistent with approved charter.	<ul style="list-style-type: none"> x List of board members (Binder 3, Tab 5) x Approved charter (Binder 3, Tab 3) 		X	Minutes of August 19, 2019 show re-election of 1 board member for a 1-year term (charter says 2) and without nominating committee (per bylaws). School director as voting board member and president inconsistent with bylaws and with best practice in the field.
G9	Governing board is diverse and reflects charter school and community population.	<ul style="list-style-type: none"> <input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Description of school and community demographics (Binder 3, Tab 7) 	X		No photos but both board and school appear to have higher percentage of white students than community at large

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G10	Governing board members have experience in key areas, such as education, finance, legal, real estate, and fundraising.	x Board member biographies (Binder 3, Tab 6)	X		Could benefit from school finance and/or legal experience
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	x Board member biographies (Binder 3, Tab 6) x Completed Form 700s (Binder 3, Tab 8)		X	School director Whyte sits as voting member on board and president, contrary to bylaws. Form 990 FY17-18 shows substantial payments (>\$40k) made to directors Lenore and Cramsie, in addition to Whyte's salary as head of school. Employees on governing boards generally considered contrary to best practice (although legal under current law with conditions).
Meetings					
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.	x Annual governing board meeting calendar (Binder 3, Tab 9) x Bylaws (Binder 3, Tab 2) x Approved charter (Binder 3, Tab 3)	X		
G13	Governing board members receive annual training regarding Brown Act requirements.	x Sign-in sheet from Brown Act training (Binder 3, Tab 10)	X		
G14	Meetings are noticed in accordance with the Brown Act.	x Sample meeting agendas (Binder 3, Tab 11) x Screenshot of charter school website (Binder 3, Tab 12)	X		Agendas are generally consistent with Brown Act, although descriptions of items may be too short to convey the topic/decision to the public

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G15	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Public comment policy (Binder 3, Tab 13)		X	Neither policy nor agendas include accommodations for individuals with disabilities or non-English speakers
G16	Minutes are approved and thereafter made available to the public.	<input checked="" type="checkbox"/> Sample meeting minutes (Binder 3, Tab 14) <input checked="" type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 15)		X	Posting of minutes on website is limited – does not include older meetings (nothing available prior to July 2019), and new minutes not uploaded promptly (6 meetings with no posted minutes from Aug 2019 to Feb 2020; Feb 2020 minutes not approved at March 2020 meeting).
G17	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	x Board meeting minutes (Binder 3, Tab 16)	X		Can’t confirm annual, but did in October 2019
Board Policies					
G18	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<input checked="" type="checkbox"/> Parent handbook (Binder 3, Tab 17) <input checked="" type="checkbox"/> Student handbook (Binder 3, Tab 18) <input checked="" type="checkbox"/> Employee handbook (Binder 3, Tab 19)	X		Parent/student handbook adopted Aug 2019
G19	Governing board has adopted policies related to conflict of interest.	x Board policies (Binder 3, Tab 20)		X	Unable to locate specific policy or conflict code
G20	Governing board has adopted policies related to student discipline and due process.	x Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G21	Governing board has adopted policies related to complaints and investigations.	x Board policies (Binder 3, Tab 20)	X		UCP
G22	Governing board has adopted internal control policies (and related forms and systems).	x Board policies (Binder 3, Tab 20)	X		
G23	Governing board has adopted policies related to bank signature authorizations.	x Board policies (Binder 3, Tab 20)	X		
G24	Governing board has adopted policies related to allowable purchases and purchasing authority.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G25	Governing board has adopted policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G26	Governing board has adopted policies related to employee harassment.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G27	Governing board has adopted and annually updates its safety plan to include all legal requirements applicable to charter schools.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		Annual safety plan update on Feb 2020 agenda (no minutes)
G28	Governing board has adopted policies related to immunization records.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		AR 5141 submitted upon request and admission process requires proof of immunization
G29	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G30	Governing board has adopted policies related to Section 504/IDEA compliance.	x Board policies (Binder 3, Tab 20)	X		Pg 19
Education Code Assurances					
G31	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q3)	X		
G32	Charter school has complied with assurance that it shall not charge tuition.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q4)	X		
G33	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.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q5)	X		
G34	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).	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q6)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G35	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.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q7)	X		
G36	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.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q8)	X		
G37	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	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q9)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Memorandum of Understanding					
G38	Charter school has complied with terms of current memorandum of understanding, if applicable.	<input type="checkbox"/> Memorandum of understanding (Binder 3, Tab 21)			No current MOU; unable to determine from available information if school complied with prior MOU
Complaint Policies & Procedures					
G39	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom.	<input type="checkbox"/> Board policies (Binder 3, Tab 20) <input type="checkbox"/> Observation of classrooms (Binder 1, Tab 10, Q5)		X	
G40	Complaint policies and procedures are available in the main/front office.	x Observation of main office (Binder 1, Tab 11, Q1)	X		
			Total "No" Responses: <u>9</u>		
			Risk Assessment: 0-10 Low 11-20 Moderate 21+ High		

The Heights: Finance/Business

Assigned District Staff Person: Tom Krzmarzick
 Position of Assigned Staff Person: Finance and Business Lead

THE HEIGHTS CHARTER FINANCE/BUSINESS OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Budget, Accounting, and Financial Reporting</u>					
F1	Governing board policies address budget, accounting, and financial reporting.	<input type="checkbox"/> Board policies (Binder 6, Tab 1)	x	<input type="checkbox"/>	Governing Board formulates financial policies and procedures. Copy of policies included in Binder 6 and reviewed. Evidence the policies were sufficient for fiscal operations. Noted in policies there is no Petty Cash fund due to the small size of school.
F2	Current budget has been approved by the governing board.	<input type="checkbox"/> Current/adopted budget (Binder 6, Tab 2) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 3)	x	<input type="checkbox"/>	Copies of Board Agenda and Meeting Minutes reviewed. Documents provide verification of current budget, as well as adopted budget approved by the Board.
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.	<input type="checkbox"/> Board meeting minutes (Binder 6, Tab 4) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q3)	x	<input type="checkbox"/>	Per the Board Meeting Minutes reflecting approval of budget and budget revisions, there is sufficient evidence the school has a clear process for reviewing the budget. Due to the small size of the charter school (approx. 250 students), there are not many instances when enrollment or operations expenditures change significantly. Business Manager is part of charter staff and very knowledgeable in school charter and school finance.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F4	Budget aligns with charter school's current LCAP or update to LCAP.	<input type="checkbox"/> Current budget (Binder 6, Tab 2) <input type="checkbox"/> LCAP/LCAP update (Binder 6, Tab 4)	x	<input type="checkbox"/>	Director reported on ADA, LCAP, Facilities, Staffing ETC...Review of budget documents with LCAP reports show the budget aligns with LCAP, Only approx. 6.2% Non-LCAP expenditures
F5	Budget provides for all financial obligations.	<input type="checkbox"/> Current budget (Binder 6, Tab 2)	x	<input type="checkbox"/>	Financial records demonstrate budget provides for all financial obligations. Noted during interview with Director of charter school, the school intentionally attempts to keep total enrollment at 250 students to ensure high educational quality
F6	Governing board approves all required financial reports.	<input type="checkbox"/> Required financial reports (Binder 6, Tab 5) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 6)	x	<input type="checkbox"/>	Minutes from appropriate Board Meetings demonstrate approval of all required financial reports (Budget Adoption, 1st/2nd Interim, Unaudited Actuals)
F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 7)	x	<input type="checkbox"/>	Submission of adopted budget submitted and included in Binder 6 (Business/Finance) data, and during meeting with Business Mgr of the charter school
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 8)	x	<input type="checkbox"/>	Submission of 1st Interim Report included in documents reviewed during interviews
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 9)	x	<input type="checkbox"/>	Submission of 2nd Interim Report included in documents reviewed during interviews
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 10)	x	<input type="checkbox"/>	Unaudited actuals included in data included in Binder 6 (Business/Finance) Board approval of 2018-19 UAs at September 2019 Meeting

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	x	<input type="checkbox"/>	Yes, Charter maintains separate accounts for restricted revenues and expenditures. Special Education funds are such an example. Charter part of the East County SELPA
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	x	<input type="checkbox"/>	Required financial reports (Budget, 1st/2nd Interim) include cash flow reports during each required reporting period
F13	Charter school's business accounting and system complies with state accounting and reporting requirements.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q4)	x	<input type="checkbox"/>	QuickBooks for Non-Profits utilized by the charter. Effective in its use and meets state accounting and reporting requirements
<u>Audit</u>					
F14	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.	<input type="checkbox"/> Proof of submission of auditor certification and contract (Binder 6, Tab 11) <input type="checkbox"/> Director of finance (or equivalent) interview ((Binder 1, Tab 2, Q5)	x	<input type="checkbox"/>	Wilkinson, Hadley, King - State approved auditors. Submission of PY Financial Audit provided at time of interview/meeting
F15	Charter school has developed auditing schedule/timeline.	<input type="checkbox"/> Auditing schedule/timeline (Binder 6, Tab 12)	x	<input type="checkbox"/>	Provided during interview discussions
F16	Charter school has submitted prior year's financial audit to authorizer.	<input type="checkbox"/> Previous year's audit (Binder 6, Tab 13) <input type="checkbox"/> Proof of submission (Binder 6, Tab 14)	x	<input type="checkbox"/>	Provided at time of interview/meeting. E-mail from Sandra Morgan (sdcharter) to Dehesa CBO 1/23/19.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F17	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	<input type="checkbox"/> Corrective plan of action (Binder 6, Tab 15) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q6)	NA	<input type="checkbox"/>	No deficiencies reported. N/A
<u>Financial Condition</u>					
F18	Charter school maintains an appropriate level of reserves for economic uncertainties.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q7)	x	<input type="checkbox"/>	Projected ending balance of \$888,397 on a \$2.4M Revenue Base for the year
F19	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q8)	x	<input type="checkbox"/>	At each required reporting period, charter school prepares a 3-year financial projection (current year, plus two future years) including assumptions and long-term debt obligations if any. Evidence included in Binder 6 review
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.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q9)	x	<input type="checkbox"/>	Evidence in recent fiscal projections as well as previous projections confirm charter will be able to meet its financial obligations and maintain an appropriate level of reserves in the current and 2 future years. (\$888K EB on \$2.4M Revenues)
<u>Cash Receipts</u>					
F21	Charter school has policies addressing cash receipts.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16)	x	<input type="checkbox"/>	Policy provided regarding cash receipts in Binder 6. If cash receipts are present, cash at a minimum deposited every Friday.
F22	Charter school maintains records of all monies received (e.g., issues receipts).	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash receipts	x	<input type="checkbox"/>	Evidence/samples provided during interview/meeting confirms charter maintains records of monies received

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
		(Binder 6, Tab 17) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q10)			
F23	Charter school deposits monies in a timely manner.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q11)	x	<input type="checkbox"/>	When applicable, monies deposited at a minimum every Friday of each week
F24	Charter school maintains records of deposits of all monies.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash deposits (Binder 6, Tab 18) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q12)	x	<input type="checkbox"/>	Evidence provided during interview/meeting confirms charter maintains records of deposits of all monies. Samples of cash deposited reviewed
F25	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q13)	x	<input type="checkbox"/>	Business Mgr reconciles bank statements to ensure accurate receipt and deposit of \$'s. Evidence provided during interview/meeting
<u>Disbursements</u>					
F26	Charter school has policies addressing disbursements.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19)	x	<input type="checkbox"/>	Documents provided in Binder 6 (Business/Finance) confirm disbursement policies
F27	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	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q14)	x	<input type="checkbox"/>	Per policies, disbursements require invoice, receiving document, appropriate approval, and ratification by governing board if amount (\$2,500) exceeds

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	amount exceeds maximum dollar amount set forth in charter school policy.				maximum dollar amount set forth in policy
F28	Checks are signed by authorized employees.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q15)	x	<input type="checkbox"/>	Per Board policy, checks are signed by Director or other designated staff approved by Board
F29	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q16)	x	<input type="checkbox"/>	When applicable, Director and Business Mgr maintain vendor payment process
F30	Charter school has segregated duties between purchasing, receiving, and accounts payable.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q17)	x	<input type="checkbox"/>	Per policies provided in Binder 6 (Business/Finance) duties are separated for each component of purchasing process. Typically, office staff of Director serve in that capacity in concert with the Business Mgr.
<u>Payroll</u>					
F31	Charter school has a salary schedule or other satisfactory salary structure.	<input type="checkbox"/> Salary schedule (Binder 6, Tab 21)	x	<input type="checkbox"/>	Document included in Binder 6 (Business/Finance)
F32	Tax deposits are completed in a timely manner.	<input type="checkbox"/> Proof of tax deposits (Binder 6, Tab 22) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q18)	x	<input type="checkbox"/>	Document included in Binder 6 (Business/Finance)
F33	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	<input type="checkbox"/> Proof of recording of earnings (Binder 6, Tab 23) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q19)	x	<input type="checkbox"/>	Charter does not participate in PERS, STRS. Social Security properly recorded

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F34	Charter school has system to provide STRS data to authorizer.	<input type="checkbox"/> Proof of submission of STRS data (Binder 6, Tab 24) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q20)	x	<input type="checkbox"/>	N/A - Charter does not provide STRS contributions
F35	Charter school has system to maintain employee earning records for preparation of W-2s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q21)	x	<input type="checkbox"/>	Charter utilizes Paychex employee earning records for preparation of W2s. Business Mgr. oversees/review process. Documents received provide evidence of system
<u>Equipment Inventory</u>					
F36	Charter school has policies addressing the purchase and maintenance of equipment.	<input type="checkbox"/> Equipment purchase and maintenance policy (Binder 6, Tab 25)	x	<input type="checkbox"/>	Policies included in Binder 6 (Business/Finance) provided for review. Director, Business Mgr and front office staff process purchases and maintenance of equipment
F37	Charter school maintains an equipment inventory that is physically located on each site.	<input type="checkbox"/> Equipment inventory (Binder 6, Tab 26)	x	<input type="checkbox"/>	List provided during interview/meeting. Limited inventory
F38	Equipment purchased with federal funds is properly identified.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q22)	x	<input type="checkbox"/>	
<u>Student Attendance (All Schools)</u>					
F39	Charter school uses a generally approved attendance accounting system.	<input type="checkbox"/> Screenshot of attendance accounting system (Binder 6, Tab 27)	x	<input type="checkbox"/>	Per accounting via restricted resource codes, equipment, if any, identified

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F40	There is a designated staff person responsible for administering attendance.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20)	x	<input type="checkbox"/>	Charter has manual attendance accounting system that reconciles registers, student work, transcripts. System adequate as long as charter maintains its one class per grade
F41	Charter school calendar includes a minimum of 175 instructional days.	<input type="checkbox"/> School calendar (Binder 6, Tab 28)	x	<input type="checkbox"/>	Director responsible for maintaining attendance accounting reporting with support from teachers and front office staff
F42	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).	<input type="checkbox"/> Class/bell schedule (Binder 6, Tab 29)	x	<input type="checkbox"/>	Calendar provided during interview/ meetings, Certification report of minimum instructional minutes provided in Binder 6. Class/Bell schedule provided during interview/meeting with Charter Business Mgr Appropriate certification reports to CDE provided evidence as well
F43	Student absences are excluded from apportionment days.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q1)	x	<input type="checkbox"/>	Review of work samples provides criteria for claiming ADA. 100% ADA yield to enrollment throughout charter (seems unreasonable). Defer to Instructional Lead for DCOT to verify 100% ADA via work samples is legitimate
F44	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q2)	x	x	Confirmed by credential review by HR Lead of DCOT
F45	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 31)	x	<input type="checkbox"/>	Documents provided confirm submission of all attendance reports to authorizer.
F46	Charter school has clear procedures for enrolling students, and confirming that	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	x	<input type="checkbox"/>	Review of enrollment agreements with students/families confirm procedures are clear for ensuring students not enrolled

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	students are not enrolled elsewhere to avoid dual enrollment.				elsewhere. Procedures sufficient due to current small enrollment of district. If enrollment should grow significantly, process would need to be updated
F47	Charter school has clear procedures for disenrolling students and providing notification to the student's district of residence.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	x	<input type="checkbox"/>	Review of enrollment procedures during interview/meeting confirms clear process for disenrolling & providing notification to the student district of residence
F48	Charter school has clear procedures for claiming and reporting ADA to the state.	<input type="checkbox"/> Policies and procedures related to claiming and reporting ADA (Binder 6, Tab 33)	x	<input type="checkbox"/>	Submission of reports at required reporting periods (P1/P2/Annual) demonstrate clear policies for claiming ADA. 100% ADA yield to enrollment may be unreasonable
F49	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	<input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q3)	x	<input type="checkbox"/>	Charter only has one track in which students are enrolled. Only one class per grade in charter
<u>Student Attendance (Schools Offering Independent Study)</u>					
F50	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).	<input type="checkbox"/> Certification (Binder 6, Tab 34) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q1)	x	<input type="checkbox"/>	Review of enrollment agreements with students/families confirm procedures are clear for ensuring students not enrolled elsewhere. Procedures sufficient due to current small enrollment of district. If enrollment should grow significantly, process would need to be updated
F51	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	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q1) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q1)	x	<input type="checkbox"/>	Review of enrollment procedures provided during interview/meeting confirms clear process for disenrolling & providing notification to the student district of residence

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	51749.5(a)(7).	<input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q2) <input type="checkbox"/> Sample grade books (Binder 6, Tab 35) <input type="checkbox"/> Sample transcripts (Binder 6, Tab 36) <input type="checkbox"/> Work samples (Binder 6, Tab 37) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q2)			
F52	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).	<input type="checkbox"/> List of course offerings (Binder 6, Tab 38)	x	<input type="checkbox"/>	Submission of reports at required reporting periods (P1/P2/Annual) demonstrate clear policies for claiming ADA. 100% ADA yield to enrollment may be unreasonable
F53	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).	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q4) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q3)	x	<input type="checkbox"/>	Course listings provided in Binder 6 (Business/Finance). Instructional Lead for DCOT reviewed course listing for compliance
F54	The program of each student in independent study is overseen by a certificated employee.	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q2) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q4)	x	<input type="checkbox"/>	Review of certificated credentials and work sample review completed by teachers of the school provided evidence program of each student overseen by certificated EE
F55	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	<input type="checkbox"/>	Yes, ratio met. By design, one class per grade in charter school

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F56	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.	<input type="checkbox"/> Board policy (Binder 6, Tab 40) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q5) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q5)	x	<input type="checkbox"/>	Documents provided during interview/meeting regarding policy gave
F57	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.	<input type="checkbox"/> Board policy (Binder 6, Tab 41) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q6) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q6)	x	<input type="checkbox"/>	Evidence of max length of time that may eclipse between assignment and completion of work.
F58	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	<input type="checkbox"/> Sample agreements (Binder 6, Tab 42) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q7) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q7)	x	<input type="checkbox"/>	Instructional Lead for DCOT reviewed policy for instructional appropriateness as well
F59	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q3)	x	<input type="checkbox"/>	Per Special Education Lead of DCOT, confirmed students don't participate IEPs provide for placement
F60	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q4)	x	<input type="checkbox"/>	Instructional Lead of DCOT verified through instructional review of school's programs that independent study students are not provided things of value that are not provided to students attending classroom-based programs

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F61	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.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q5)	x	<input type="checkbox"/>	All students reviewed located in county in which apportionment is reported
F62	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q6) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q8) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q8)	x	<input type="checkbox"/>	Documents provided during interview/meeting and review of sample student records, registers and work products demonstrated student work samples evaluated by certificated teachers
F63	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q7)	x	<input type="checkbox"/>	Work samples provided reviewed during meeting/interview. Instructional Lead for DCOT confirmed during review value of student work judged by certificated teacher. Evidence provided through work samples of certificated teacher review of student work
F64	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 type="checkbox"/> Request for determination of funding (Binder 6, Tab 44) <input type="checkbox"/> SBE determination of funding (Binder 6, Tab 45)	x	<input type="checkbox"/>	Request for funding determination as well as CDE issued funding determination provided during interview/meeting
<p><i>If school does <u>not</u> offer independent study:</i> Total "No" Responses: ___ Risk Assessment:</p>					

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments		
			0-12	Low	13-24	Moderate	25+ High
<p><i>If school <u>does</u> offer independent study:</i> Total "No" Responses: <u>1</u> _____</p> <p>Risk Assessment: 0-16 Low 17-32 Moderate 33+ High</p>							

815-21/4533779.4

Assigned District Staff Person: __ Cynthia R. Free /Personnel
 Position of Assigned Staff Person: Personnel Lead

THE HEIGHTS CHARTER PERSONNEL OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
All Employees					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 0-N/A 	✓	•	No MOU'S
P2	Charter school employee handbook and policies guarantee fair hiring practices.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) 	✓	•	HB & Policies - same document Employees at will
P3	Charter school enters employment contracts with all persons hired to work at school.	<ul style="list-style-type: none"> Sample employment contracts (Binder 5, Tab 5) 3 Samples 	✓	•	Contract do not specify teacher(certificated) or support (classified) position/Assignment Certificated Only
P4	All employees have been fingerprinted, including Department of Justice background checks.	<ul style="list-style-type: none"> Documentation of fingerprint clearance for all employees (Binder 5, Tab 6) 	✓	•	17 Certificated; 17 Classified Total 34 DOJ checks
P5	All employees have passed TB test and results are current.	<ul style="list-style-type: none"> Documentation of current TB test results for all employees (Binder 5, Tab 7) 	✓	•	At sight visit = received accurate list of certificated and classified employees Total 34 employees completed TB
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 8) 	✓	•	Total 34 employees completed training List updated at sight visit
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.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 9) 	✓	•	Training will be completed by 12/31/20 before (1/1/20) deadline per notebook. At sight visit charter complied with training with all staff even though they had under 50.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	<ul style="list-style-type: none"> Observation of main office (Binder 1, Tab 11, Q4) 	✓	•	In Front Office - at sight visit See attached B-1, T-11 Oversight Checklist
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 	✓	•	If employee served with charter for 12 mo and 1,250 hrs during 12 mo period (pg 10) OK for Family & Medical leave.
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 	✓	•	Labor code pg 245-246 - 3 days per yr. pr charter contract. Unpaid leave if worked 12 mo prior (pg 10 - OK Note: not in Employee Handbook on contract
P11	Governing board approves personnel actions.	<ul style="list-style-type: none"> Governing board minutes (Binder 5, Tab 10) 	✓	✓	No personnel actions approved by board.
Certificated Employees					
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	•	K-8 charter: T-11 List of employees - 17 Certificate staff for 259 students. No MOU's for employment
P13	Charter school provides teachers with professional development opportunities.	<ul style="list-style-type: none"> Professional development calendar (Binder 5, Tab 12) Professional development session agenda (Binder 5, Tab 13) Teacher interview (Binder 1, Tab 4, Q2) 	✓	•	12 staff development items 2019-20 year 3 PD examples: 1) restorative Justice 2) CPR, First Aid, AED 3) EMT through the American Safety program. Completed teacher interview at sight visit - Science Teacher
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	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by core 	✓	•	Yes, except Music Teacher - 30 day permit OK not a core teacher. Explained to charter that it will need to work towards a credentialed music teacher in the future.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

	any MOUs.	<ul style="list-style-type: none"> teachers (Binder 5, Tab 14) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 		
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by teachers (Binder 5, Tab 15) 	✓	4 teachers - No EL. At sight visit Director explained that there were only 2 students needing EL services. Students are with teachers with EL authorizations per Director. CK'd credentials - both OK. Charter needs to correct teachers who are missing EL per auditor.
P16	Teachers providing special education and related services have required credentials and certifications	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by special education teachers (Binder 5, Tab 16) 	✓	Yes, 1 special ed teacher – 25 students
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	<ul style="list-style-type: none"> Sample evaluations (Binder 5, Tab 17) Teacher interview (Binder 1, Tab 4, Q3) 	✓	Sample Evaluations on 3 teachers Completed teacher interview at sight visit – Science Teacher
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.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of qualifications held by classified aides (Binder 5, Tab 18) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 		Need Staff list & assignments to review Received classified staffing list with degrees and college coursework verified

Total "No" Responses: _
Risk Assessment: **LOW** 5-8 Moderate 9+ High

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

The Heights: Educational Program

Assigned District Staff Person: Linda Kimball
 Position of Assigned Staff Person: Instructional Program Lead

THE HEIGHTS CHARTER EDUCATIONAL PROGRAM OVERSIGHT CHECKLIST

This Checklist includes Special Education Compliance areas but those are addressed in the Special Education Oversight Checklist.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) 	√	<input type="checkbox"/>	
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q1) 	√	<input type="checkbox"/>	
E3	Charter school staffing complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Staffing chart (Binder 2, Tab 3) 	<input type="checkbox"/>	<input type="checkbox"/>	
E4	Charter school staffing is sufficient to carry out educational program.	<ul style="list-style-type: none"> Staffing chart (Binder 2, Tab 3) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2) 	√	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
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.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E6	Charter school has obtained WASC accreditation, if applicable.	<ul style="list-style-type: none"> WASC accreditation (Binder 2, Tab 5) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
<u>Services to Special Populations</u>					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3) 	<input type="checkbox"/>	<input type="checkbox"/>	
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q4) 	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> • Student handbook (Binder 2, Tab 4) • SELPA policies and procedures manual (Binder 2, Tab 6) • CALPADS reports for Fall 1 submission (Binder 2, Tab 7) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q5) 	<input type="checkbox"/>	<input type="checkbox"/>	
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> • Sample IEPs (Binder 2, Tab 8) • Sample 504 plans (Binder 2, Tab 9) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) 	<input type="checkbox"/>	<input type="checkbox"/>	
E11	All required members of IEP teams attend IEP meetings.	<ul style="list-style-type: none"> • Sample IEPs (Binder 2, Tab 8) 	<input type="checkbox"/>	<input type="checkbox"/>	
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<ul style="list-style-type: none"> • Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10) 	<input type="checkbox"/>	<input type="checkbox"/>	
E13	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"> • Director of finance (or equivalent) interview (Binder 1, Tab 2, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	
E14	Charter school follows process for identification and reclassification of students who are English Learners.	<ul style="list-style-type: none"> • Student handbook (Binder 2, Tab 4) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q7) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E15	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"> • Student handbook (Binder 2, Tab 4) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q8) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
<u>Curricular Materials</u>					
E16	Charter school uses standards-aligned instructional materials.	<ul style="list-style-type: none"> • Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) • Classroom observations (Binder 1, Tab 10, Q1) 	√	<input type="checkbox"/>	
E17	Charter school uses instructional materials that address the specific needs of English Learners.	<ul style="list-style-type: none"> • Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q9) • Classroom observations (Binder 1, Tab 10, Q2) 	√	<input type="checkbox"/>	
E18	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"> • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q10) • Classroom observations (Binder 1, Tab 10, Q3) 	√	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E19	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"> Class schedule (Binder 2, Tab 11) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q11) Classroom observations (Binder 1, Tab 10, Q4) 	√	<input type="checkbox"/>	
<u>Assessment</u>					
E20	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"> Assessment calendar (Binder 2, Tab 12) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) 	√	<input type="checkbox"/>	
E21	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607(b).	<ul style="list-style-type: none"> SBAC (Binder 2, Tab 13) Dashboard Data (Binder 2, Tab 14) 	√	<input type="checkbox"/>	
E22	Charter school has completed and timely posted a SARC containing required elements.	<ul style="list-style-type: none"> SARC (Binder 2, Tab 15) 	√	<input type="checkbox"/>	
E23	Charter school regularly collects student achievement data and reports it to parents and staff.	<ul style="list-style-type: none"> Sample data reports to parents (Binder 2, Tab 16) Sample data reports to staff (Binder 2, Tab 17) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q13) 	√	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E24	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"> Notifications (Binder 2, Tab 18) 	√	<input type="checkbox"/>	
E25	Charter school has current LCAP/LCAP Update that has been presented to, reviewed and approved by the Charter School's governing board.	<ul style="list-style-type: none"> LCAP/LCAP update (Binder 2, Tab 19) Minutes from Board meeting (Binder 2, Tab 20) 	√	<input type="checkbox"/>	
E26	Title I funds/categorical funding are being used to supplement the school's LCAP goals.	<ul style="list-style-type: none"> LCAP/LCAP update (Binder 2, Tab 19) Director of finance (or equivalent) interview (Binder 1, Tab 2, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Admissions</u>					
E27	Charter school complies with the admissions practices described in the approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	<ul style="list-style-type: none"> Charter school student data (Binder 2, Tab 23) Student data from nearby school districts (Binder 2, Tab 24) 	<input type="checkbox"/>	<input type="checkbox"/>	The demographics of Heights Charter are largely Caucasian (82%), not at all reflective of Dehesa or San Diego County. Only 1.6% of the population is made up of English learners.
E30	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 cover options and enrollment assistance information.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	
E31	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.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Discipline</u>					
E32	Charter school discipline policies and practices are consistent with terms of charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E33	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.	<ul style="list-style-type: none"> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q14) 	<input type="checkbox"/>	<input type="checkbox"/>	
E34	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"> Discipline data (Binder 2, Tab 26) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Health and Safety</u>					
E35	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.	<ul style="list-style-type: none"> School safety plan (Binder 2, Tab 27) 	<input type="checkbox"/>	<input type="checkbox"/>	
E36	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"> Training sign-in sheets (Binder 2, Tab 28) Observation of main office (Binder 1, Tab 11, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>	
E37	Charter school has a policy/procedure for visitors to enter and leave campus.	<ul style="list-style-type: none"> Policy or procedure (Binder 2, Tab 29) 	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E38	Charter school provides for the screening of pupils' vision, hearing, screening for scoliosis, and required immunizations.	<ul style="list-style-type: none"> Records of student screenings (Binder 2, Tab 30) 	<input type="checkbox"/>	<input type="checkbox"/>	
E39	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"> Suicide Prevention Policy (Binder 2, Tab 31) Board meeting minutes (Binder 2, Tab 32) 	<input type="checkbox"/>	<input type="checkbox"/>	
E40	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 findings are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> Application for universal meal service (Binder 2, Tab 33) Governing board resolution (Binder 2, Tab 34) 	<input type="checkbox"/>	<input type="checkbox"/>	
E41	Charter school provides at least one meal per day to students who qualify for FRPL.	<ul style="list-style-type: none"> Executive director (or equivalent) interview (Binder 1, Tab 3, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	
E42	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"> Screenshot from website (Binder 2, Tab 35) 	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E43	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.	<ul style="list-style-type: none"> Sexual health and HIV prevention education course description (Binder 2, Tab 36) 	<input type="checkbox"/>	<input type="checkbox"/>	
E44	By January 1, 2020, 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.	<ul style="list-style-type: none"> Policy or other description of method for informing parents/guardians (Binder 2, Tab 37) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Parent Notifications</u>					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 38) 	<input type="checkbox"/>	<input type="checkbox"/>	
E46	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).	<ul style="list-style-type: none"> Notice (Binder 2, Tab 39) 	<input type="checkbox"/>	<input type="checkbox"/>	
E47	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"> Notice (Binder 2, Tab 40) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E48	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.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 41) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Student Records</u>					
E49	Charter school maintains comprehensive records regarding its students.	<ul style="list-style-type: none"> Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E50	Charter school maintains student records, including special education records, in a confidential and secure location.	<ul style="list-style-type: none"> Policy regarding confidentiality of student records (Binder 2, Tab 43) Observation of main office (Binder 1, Tab 11, Q3) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E51	Charter school has a policy or procedure for parents to review student files, including a log.	<ul style="list-style-type: none"> Policy regarding review of records (Binder 2, Tab 44) 	<input type="checkbox"/>	<input type="checkbox"/>	
E52	Charter school has policy or procedure regarding release of student information.	<ul style="list-style-type: none"> Policy regarding release of student information (Binder 2, Tab 45) 	<input type="checkbox"/>	<input type="checkbox"/>	
E53	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q15) 	<input type="checkbox"/>	<input type="checkbox"/>	
			Total "No" Responses: 1 Risk Assessment: 0-13 Low 14-26 Moderate 27+ High		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:
 JoAnn Murphy
 Position of Assigned Staff Person:
 Special Education Lead

THE HEIGHTS CHARTER SPECIAL EDUCATION OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<input type="checkbox"/> Approved charter (Binder 2, Tab 1) <input type="checkbox"/> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2)	X		Has an MOU signed 4/15 which expired in 2017 Dehesa has direct oversight
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<input type="checkbox"/> Approved charter (Binder 2, Tab 1) <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, 01)	X		The charter school curriculum and instructional plan are aligned but need to be verified with IEPs
E3	Charter school staffing complies with approved charter.	<input type="checkbox"/> Approved charter (Binder 2, Tab 1) <input checked="" type="checkbox"/> Staffing chart (Binder, 2 Tab 3)	X		Staffing verified; concern about 1.0 position split between psychologist, teacher, 504 =, SST and other duties.
<u>Services to Special Populations</u>					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<input type="checkbox"/> Student handbook (Binder 2, Tab 4) <input type="checkbox"/> CALPADS reports for Fall I submission (Binder 2, Tab 7) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3)	X		<p>Policies and procedures are not written down. The East County SELPA does not have a procedural manual. Training is provided to the members of the SELPA on key compliance issues as they arise.</p> <p>Need procedures written</p>

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> √ CALPADS reports for Fall I submission (Binder 2, Tab 7) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q4) 	X		The school has an SST process and working procedures for referral and assessment under IDEA
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> √ CALPADS reports for Fall I submission (Binder 2, Tab 7) √ Instructional leader (or equivalent) interview 	X		Practices are in place to meet the timelines associated with IDEA requirements. The unannounced review of IEPs indicates that timelines are adhered to and that the school is on track with IEPs.
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> √ SEIS Unannounced review <input type="checkbox"/> Sample 504 plans (Binder 2, Tab 9) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) √ Unannounced SEIS Review of IEPs 	X		There is no evidence to see that Service Tracker is used in SEIS nor is there any other system used for documentation of the provision of services.
E11	All required members of IEP teams attend IEP meetings.	√ Unannounced SEIS Review of IEPs	X		Documents in SEIS reflect that all IEP team members attend the meeting.
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	√ Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10)	X		School does not enroll a small number of students disproportionately—the identification rates are consistent with both Dehesa and The Heights.
E13	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	√ Director of finance (or equivalent) interview (Binder 1, Tab 2, Qi)	X		The 6500 code expenditures are reviewed to ensure that special education funds are used appropriately

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Assessment					
E20	School does not enroll a small number of students disproportionately—the identification rates are consistent with both Dehesa and The Heights.	<input type="checkbox"/> Assessment calendar (Binder 2, Tab 12) <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) <input type="checkbox"/> Annual Performance Indicator Report		X	School did not meet ELA and Math participation rate due to parents opt out of testing. The district is under PIR for failure to meet the statewide targets for testing
Admissions					
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<input checked="" type="checkbox"/> Admission s/enrollment forms and policies (Binder 2, Tab 21)	X		Enrollment is open to students with disabilities. Procedures for Interim Placement in special education for 30 days are implemented
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background students with disabilities, English learners , and FRPL students).	<input checked="" type="checkbox"/> Charter school student data (Binder 2, - Tab 23) <input type="checkbox"/> Student data from nearby school districts (Binder 2, Tab 24)	X		The socioeconomic background of the students in the Heights is 11.9% while Dehesa is 56%. The enrollment process is open to all students regardless of background or disability.
Discipline					
E32	Charter school discipline policies and practices are consistent with terms of charter.	<input type="checkbox"/> Approved charter (Binder 2, Tab 1) <input type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of	X		The school has met the statewide targets for discipline.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E33	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 (Binder 2, Tab 25) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder I, Tab I 014)	X		Consistent with EC and IDEA requirements.
E34	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	<input type="checkbox"/> Discipline data <input type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25)	X		No suspensions or expulsions
Parent Notifications					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	<input type="checkbox"/> (Notice (Binder 2, Tab 38)	X		The procedural safeguards are also provided to parents prior to the IEP meeting and assessments.
Student Records					
E49	Charter school maintains comprehensive records regarding its students.	<input checked="" type="checkbox"/> Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42)	X		Records are maintained in a confidential environment and can only be accessed with confidential ID and password
E50	Charter school maintains student records, including special education records, in a confidential and secure location.	<input checked="" type="checkbox"/> Policy regarding confidentiality of student records (Binder 2, Tab 43) <input type="checkbox"/> Observation of main office (Binder I, Tab 11, Q3)	X		General education teachers have access to SEIS on Read only status.
E53	Teachers have reasonable access to Special education records	<input checked="" type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q15)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff: Justin Cunningham
 Position of Assigned Staff Person: Project Lead

THE HEIGHTS CHARTER OPERATIONS/FACILITIES OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Maintenance of Facilities					
O32	A designated person is responsible for overseeing operations and facilities management.	√ Staff organizational chart (Binder 4, Tab 1)	X		Director - "Maintenance"
O33	Facilities are adequate for number of students and types of programs.	√ Capacity chart for campus facilities (Binder 4, Tab 2) √ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q1)	X		
O34	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.	√ Inspection logs (Binder 4, Tab 3) √ Operations manager (or equivalent) interview ((Binder 1, Tab 5, Q2)			
Legal Compliance					
O35	All facilities meet Americans with Disabilities Act requirements.	<input type="checkbox"/> ADA certification (Binder 4, Tab 4)			Commercial facility built in 2002 meets ADA
O36	All single-user restrooms have been designated as all-gender restrooms.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q3)	X		
O37	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan (Binder 4, Tab 5)	X		Commercial facility built in 2002 meets 1986 AHER
O38	Charter school has certificate of occupancy on file.	<input type="checkbox"/> Certificate of occupancy (Binder 4, Tab 6)			Their attorney says they don't need one, but they do have copy of lease agreement.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O39	Charter school has conditional use permit on file, as applicable.	<input type="checkbox"/> Conditional use permit (Binder 4, Tab 7)		X	In progress, applied for from County
O40	Charter school has safety inspection by local fire department on file.	<input checked="" type="checkbox"/> Safety inspection by local fire department (Binder 4, Tab 8)	X		
O41	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.	<input checked="" type="checkbox"/> Emergency action plan (Binder 4, Tab 9) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q4)	X		
O42	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q5)			N/A
O43	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q12)			N/A
O44	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	<input checked="" type="checkbox"/> Certificates of insurance (Binder 4, Tab 10)			
O45	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1.	<input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q7)	X	X	Considering Heights is outside Dehesa's boundaries, geographic and site limitations are not met but the renewal until 2013 is in place.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O46	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 (Binder 4, Tab 11) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q8, Q9)	X		Only one location
O47	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 (Binder 4, Tab 11) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q10)	X		
			Total "No" Responses: 2.5 Risk Assessment: 0-4 Low 5-7 Moderate 8+ High		

The overall Heights response to the Facilities and Operations Oversight was forthcoming and transparent.

815-21/4533461.4

Dehesa Charter Oversight Report

Method School

Method School: Governance

Context

Method Schools is organized as a single corporation holding two separate charters: Method LA, authorized by Acton Agua Dulce Unified School District, and Method School, authorized by Dehesa Elementary School District. The current board and leadership have been in place since the school's founding.

Concerns

- IRS Form 990 annual return for FY 18-19 shows 501c3 determination request as pending (consistent with no records for Method Schools in IRS search). This means the school may be facing penalties or late tax payments for failing to apply for 501c3 determination within 27 months of formation.
- The board president is knowledgeable and leads meeting firmly; other member participation is limited. Board composition does not cover all of the specific skills and experience identified in charter.
- All current board members have served since 2013, terms not staggered, nominating committee referenced in charter has not been used, and no parent representative on the board. In addition, School Advisory Committee designed to advise on governance issues has not been formed, although efforts have been made to develop online community of parents (although not intended to advise governance).
- Solid set of board-adopted policies, but bylaws need updating to match current law and address inconsistencies in governing board terms and composition.
- Is the organization operated and governed effectively?
 - * Lapse with respect to federal tax status is significant and potentially costly. Board appears to be effective, although neither meetings nor leader evaluation are focused around identified school goals and performance outcomes. There is an on-line performance management system in place, but it is unclear from board observation and minutes how the governing board uses this information.
- Is the school meeting public policy purposes?
 - * Violation of IRS requirements is contrary to public policy. School is not meeting public policy purposes related to parent/community engagement in governance.

Oversight Checklist Risk Assessment: Low

Overall Assessment Score: Moderate

Recommendations:

- Request an explanation for failure to obtain IRS 501c3 determination, along with plan for determining potential liabilities and copies of all documents filed with the IRS to address the situation.
- Request revision of bylaws and charter to establish consistent standard and process for board composition, recruitment, nomination, election and terms. Revision should include a reasonable, workable process for stakeholder engagement in governance.

Method School: Finance/Business

Context

Review of documents and reports for Finance and Business (Binder 6) was reviewed and analyzed prior to a site interview/meeting. During the site visit on March 4, 2020 in Murietta, CA, site of the Method School facility, the review process continued during an interview/meeting with Mark Holley, Co-Founder of the school, and Cory Cavanah, CEO of Creative Back Office. Review and questions regarding the documents provided and questions related to the Checklist Compliance Areas were discussed.

Due to the sheer volume of items (65) to be reviewed in this section, a scoring system using a formula from the number of “no” responses may not reveal the true risk assessment of a given charter. From a strict formula calculation perspective, a score of less than 25% “no” responses or (3 out of 65, or 4.6%, in Method’s case) indicates a Checklist Risk Assessment of “Low” for the charter school. Other charter schools reviewed as part of this process required an additional **Overall Risk Assessment** due to responses received and additional in-depth data/information analysis review for understanding of reported information. An Interpretive Risk Score was not required for Method School due to the clarity, straightforward reports and processes discovered during the review.

Concerns

The majority of attendance days are earned during the summer months. Total FY ADA projected of 465. ADA during the summer is approximately 2,000. After participating in Method’s program during the summer months, students typically return to their district of residence. The charter is disciplined in reporting and sharing student summer enrollment data with San Diego County School Districts whose students have enrolled in Method’s independent study during summer. Evidence was provided and shared that demonstrates a detailed communication process for alerting the district of residence of the students that enroll in Method’s summer program. There is potentially a statewide issue of more than one ADA being able to be claimed for one student in a given year because of potential double counting the same student by two schools. Again, Method School has developed and implemented a thorough process to communicate and share information regarding the students that enroll in its program during the summer with their district of residence schools. Whether or not a given district of residence disenrolls its students participating in Method’s summer programs was not reviewed and could not be confirmed as part of this review.

A recent development regarding Method School’s claiming of ADA has surfaced due to the COVID-19 crisis. Due to the COVID-19 crisis, the California Department of Education (CDE) revised the cut-off reporting date for collecting attendance data from April 3, 2020, to February 29, 2020. This is a 19-day reduction in the “divisor” used for ADA calculation purposes. Because of the significant amount of peak attendance claimed by Method School during the summer months and by its current design of enrolling a lesser number of students during the remainder of its school year, the school’s ADA will experience an artificial increase of about 250 ADA, and increased revenues of approximately \$2.5M. The school was diligent in alerting the authorizing district of this recent development and is currently holding the related windfall in a reserve account. A “spirit of transparency” is evident by the school’s quick communication to the authorizing district of this unexpected windfall in revenues. The intent of the directive by CDE was to hold LEAs harmless due to the COVID-19 crisis and has created an unusual unexpected revenue increase for the school.

Oversight Checklist Risk Assessment: Low

Recommendations

None

Method School: Personnel

Context

The Method School preliminary review established a possible risk factor of 15 (High). After two site visits to collect data and coach the Human Resources (HR) staff on what was needed for the oversight process, the risk factor went down to a 5 (Moderate). Being a small charter and probably their first audit review, their HR did not have a system in place to collect their data easily. HR spent more time copying credentials and DOJ clearances from other secured sites.

Concerns

Even though Method is at a 5 (Moderate) risk level, Personnel Checklist items and areas of concern are:

- P-5 Since there was no tracking system for TB tests, 12 employees were not complete. HR is requiring that all are completed by 4/30/20. I recommended that they contract with a local health provider lab and bring one onsite to complete all 12 at one time. This would be a more convenient and cost-effective process for HR and employees. Employees have to take time off to complete the TB process and HR provides a reimbursement. Note: Not sure when this will be corrected because of the coronavirus situation.
- P-7: Method Charter (being less than 50 employees) has not required any anti-harassment training for any employees.
- P-9: No 12 weeks of job-protected unpaid parental leave.
- P-10: No provision for protected leave and sick leave as it pertains to child and relative care laws.
- P-11: Governing Board does not approve personnel actions.
- P-13: Professional Development (PD): PD was not as extensive as other charters. Method is moving towards adding links online for additional PD for staff.
- P-17: HR administration has not started annual formal evaluations. HR currently completes bi-weekly/monthly objective progress checks. There is also a monthly career development reflection review.

Oversight Checklist Risk Assessment: Moderate

Recommendations:

- Excel data or other system to house the information needed for future audits.
- Even though both of the informal evaluation processes looked effective, it is recommended to begin an annual formal evaluation process to take place. It was suggested that Method get evaluation samples from Dehesa or the local County Office of Education human resources services for certificated and classified (support) staff evaluations.
- Require staff to complete the online anti-harassment training for managers and non-managers as part of professional development for staff.

Method School: Educational Program

Context

Method School is an independent study charter school dedicated to providing flexible learning opportunities for students through a mixture of direct teaching provided virtually through Zoom and other technologies, and online learning through the use of SmartFox. Smartfox is a Learning Management System (LMS) and Student Information System (SIS) that is proprietary to Method Schools.

Through Zoom, students are introduced to concepts, read text, see videos, and have comprehension checks and quizzes. Teachers also use Zoom to instruct students, check with them for understanding, reinforce key concepts, and touch base with students.

In the Method model, parents are asked to be involved in the education of the students, but the teachers are the teachers of record for the students and work with them directly. Method teachers meet weekly with students and check work a minimum of every 20 days.

In the virtual context, teachers are aware cheating can occur, and they are mindful and attentive to this possibility. The possibility of students “gaming the system” makes checking for comprehension checks particularly important, and teachers understand this. Method is directly responsible for those who instruct their stu-

dents. Method directly oversees, supports, trains, assigns and supervises staff members who work with their students.

Data

On the State assessment for 2019, only 47 students were tested in English language arts. The results were that students scored 22.5 points below standard, which was an increase of 17.2 points from the prior year. In mathematics, 48 students took the CAASPP test. As a group, students scored 80.3 points below standard in mathematics, which was an increase of 12.7 points from the prior year. Also, seven students, or 7% of the student population, opted out of taking the 2019 CAASPP.

Of the 29 students eligible for graduation, nine, or 31% graduated. This was a 12.5% increase from the prior year. Last year, the cohort population was 29. When asked to explain the low graduation rates, the school responded that due to the open entry/exit nature of students, there are many included in that population, especially at 12th grade, that come in quite credit-deficient or come in temporarily and decide to move on — sometimes to an adult education program or through getting a CHSPE or GED. When students choose to enroll in adult ed or test out, those students still count as "non-graduates."

Demographics

Of the 100 students at Method School, 49% are Caucasian, 29% are Hispanic, 10% are African American and 7% are two or more races. Only 1% of the student population was made up of English Learners. By comparison, in Dehesa and its charters, the total rate of English Learners is 4%. Because of the relatively low numbers of English learners, the group was not statistically significant; therefore State testing data is limited. About 40% of the students are socioeconomically disadvantaged. The demographics at Method largely represent those of the chartering agency, Dehesa School District.

Concerns

- Achievement and graduation rates are low.

Oversight Checklist Risk Assessment: Low

Recommendations

- Implement plan and timeline to improve achievement and graduation rates.

Method School: Special Education

Considering the many regulations and unique metrics used to evaluate risk for Special Education issues, the format for this section of this Oversight Report will also be unique; instead of the Recommendations coming at the end of this report, each area identified with an underlined heading will have a follow up ***Corrective Action*** statement.

Context

Method Schools is authorized by the Dehesa School District and functions as a public school within the District for special education purposes in conformity with Education Code Section 4764(b). Students with disabilities access the full continuum of programs and services available as a member of the East County Special Education Local Plan Area (SELPA). Student programming onsite consists of Specialized Academic Instruction (SAI) and/or related services of special education using an independent online study approach. No students are served outside the school at this time. <https://www.cde.ca.gov/sp/se/ac/spedinchartsch.asp>

Data

1. Annual Performance Report (California Department of Education, Special Education Division – Method School (2018-19). This report is required by Individuals with Disabilities Education Improvement Act of 2004 (IDEA) (20 U.S.C. 1416(b)(2)(C)(ii) and 34 CFR 300.602). All local education agencies including school districts, county offices of education and charter schools. There are 17 indicators that measure data relative to the complaint implementation of federal law in multiple areas such as statewide assessment, graduation rate, discipline, least restrictive environment, disproportionality, and IEP compliance. This document will serve as reference within the body of the report for each charter school for which Dehesa is reviewed and is available online at www.cde.ca.gov/sp/se/ds/leadatarpts.asp.
2. California School Dashboard
3. Memorandum of Understanding: Dehesa School District and Method School (2012-2017)
4. Special Education Student Information — SEIS is a web-based system that allows centralized, online access to the Individual Education Plan for all students, the management of that data, CALPADS reporting and service tracking. Its maintenance and operation are funded by the East County SELPA.

State Assessment

It is important to note that in some of the required measures, the number of students served at the Local Education Agency level can be too small for meaningful calculations. In both math and English language arts the sample for students with disabilities was too small, so it was not possible to measure state targets against it.

The Annual Performance Report (2018-19) set a specific special education target of >95% participation in both English language arts and math. Method Schools had a participation rate of 100% in both areas. This is a strong positive result for the school that sets them apart from most schools in a very challenging area.

The school has a Performance Indicator Review (PIR) in progress in the areas of ELA and math achievement. The subgroup number was too small to report statistics; however, the CDE did apply the PIR for this area. It is advisable to stay in contact with them to determine that the goals are met in 2019-20.

Curriculum

School has developed Smartfox course modules customized to meet unique needs of students without losing the integrity of the A-G courses. All students with disabilities have access to the curriculum with appropriate and differentiated instruction.

All students access general education instruction supported by Student Success Managers and Academic Achievement Manager. Special Education Directors for elementary and high school oversee instruction and IEP process. General education teachers are involved in IEP.

NPA contractors are used for APE and Speech Therapy. The speech contractor is not listed as a certified non-public agency provider. NPA certification is a requirement and must be verified or use another certified provider. The school is referred to EC 56366(d) in the Education Code, which requires districts/charter schools to ensure that NPA/NPA providers with whom its contract has met state certification standards.

Disproportionality

Based on data used for 2018-2019 from the California School Dashboard, Method School does not enroll a disproportionately small number of students with disabilities compared to its enrollment. The identification rate of 22% for Method Schools was determined using the CALPADS enrollment (100) and Special Education Student Information System (SEIS) (22), while the identification rate for students with disabilities in Dehesa is

10.6%.

CALPADS data reflects that the EL and Socioeconomic Disadvantaged population in the Methods Schools (EL1% and Socioeconomic Disadvantaged 11.9%) are not reflective of the Dehesa School District (EL10.9% and Socioeconomic Disadvantaged 56.2%). The enrollment process is open to all students regardless of EL Status, Socioeconomic Disadvantaged or students with disabilities. There are no recommendations to change the open process for enrollment in the charter school.

Policies and Procedures

Clear procedures and well-articulated practices are in place for the enrollment of students with disabilities on a 30-day interim basis. Upon enrollment, all students are assigned a home room teacher who is the main link for the coordination of services in the school program. The philosophy of the school is to embrace all students with a cadre of teacher and program supports to ensure immediate success. A follow-up IEP meeting occurs on a scheduled basis and includes all designated members of the IEP team. Policies are implemented to ensure compliance with IDEA special education timelines and verified through the unannounced review of all IEPs in SEIS during the course of this study.

Policies and procedures are in place for referral/assessment for both 504 and student team. The school has a multidisciplinary student study team using a multi-tiered approach to interventions including Student Success Managers. General education teachers and parents are always a key member of the team.

The school does not currently have a procedural handbook for special education although there was evidence of solid procedural function in the components of special education. The staff is well trained, but would like to maintain a working relationship with Dehesa to access training and support. Since they operate as a school within the district, we encourage the district and East County SELPA are encouraged to explore ways to interact with Method School.

The last Memorandum of Understanding between the Dehesa School District and Method School dated 7/1/14 and signed on 12/13 expired on 6/30/17. Method School has not received an updated MOU from Dehesa at the time of this study.

Corrective Action: Renew the MOU between Dehesa and Method School, and enhance special education support areas if needed. The Dehesa district should find ways to provide procedural oversight for special education to the charter school.

IEP Timeline/Compliance

A review of the Annual Performance Report for Method School indicates that they have achieved 100% compliance on both indicators for IEP compliance. The rate of timely IEPs, such as the interim 30 day, annual and triennial have met all the compliance statewide targets. This finding is based on the 2018-19 data; however, the unannounced review of the SEIS files verifies that the school continues to meet targets in this area in 2019-20.

The reviewer did not find evidence that the Service Tracker was used in SEIS to document the provision of services as outlined in the IEP for each student, in the random review of files.

The school reported that all service providers have been documented in SEIS since August, 2019. It is recommended that the administration continue the practice of verification of all services in the IEP through SEIS or any other system

IEPs were reviewed in SEIS to confirm that all members of the IEP team were present at scheduled IEP meetings. The school's use of Zoom meeting formats provides a solid range of options for all parties to attend the meeting. Interviews with parents gave the school high marks for IEP meeting quality and consistency.

Corrective Action: Consider using Service Tracker in SEIS or some other system of documenting the provision of the services outlined in the IEP.

The school has a well-established Student Study Team process using a multitiered approach to interventions. The use of the Level 1 and 2 tiers for intervention eliminate the rush to place students in special education or more restrictive environments. There is a high degree of teamwork among all teachers in the SST process to problem solve and develop new strategies to support students that was very impressive.

Parents praised the school for the quality of instruction and dedication of the staff. They all expressed their appreciation for the IEP process and the level of participation of all staff for the duration of the IEP.

Staffing

Staffing is specialized with a one-on-one approach from a general education teacher in each class with support from credentialed special education teachers. All special education staff were verified through the Commission on Teacher Credentialing.

All other related services of special education, such as occupational therapy and speech therapy, are provided through certified nonpublic agency providers. Services for specialized areas such as orientation and mobility and itinerant services for the visually impaired are accessed through the East County Special Education Local Plan Area (SELPA) regional classes.

During the course of the study it came to our attention that some 1-1 related services for special education are provided in a community room setting such as a library or local community meeting space. This is an appropriate method for accessing itinerant related services for special education, provided the parent or some other adult is also present in the room. The school should caution staff to always meet with another adult present.

Corrective Action: Always ensure that 1-1 related services of the IEP such as speech therapy, occupational therapy, etc. are provided in a supervised setting.

Suspension/Expulsion

The Annual Performance Report indicated the Discipline Rate is <2.76% in the district and meets the criteria established for discipline. There are no instances of suspension or expulsion of students with disabilities.

Student Records

Student records are stored in a confidential and secure location under staff direction. All IEPs are maintained within the SEIS system and available only with a confidential identification and password. All teachers have access to the records for students with disabilities through SEIS.

Oversight Checklist Risk Assessment : Low

Method School: Facilities/Operations

Context

Sometimes referred to as Method Schools because they also have a school authorized by Acton Dulce Unified School District in Los Angeles County, Dehesa's Method School was established in 2014. With their renewal in 2018 they transitioned from a resource center to a virtual independent study school. Dehesa's Method School has an enrollment of about 420 students, grades K-12, with a much higher ADA due to independent study summer school students. Method School is currently in the facility they occupied as a resource center in Murrieta, CA, using it as administrative offices, but are planning to move to a much smaller site now that they are only a virtual independent study school.

Oversight Checklist Risk Assessment: Low

Concerns

- The visit and follow-through of submitting compliance evidence met practically all checklist items. Being a leased commercial site, some documentation was not applicable.



Response to Dehesa Oversight Report

Governance

Concerns:

IRS Form 990 annual return for FY 18-19 shows 501c3 determination request as pending (consistent with no records for Method Schools in IRS search). This means the school may be facing penalties or late tax payments for failing to apply for 501c3 determination within 27 months of formation.

We are in the process of completing the paperwork and other requirements to qualify for the 501(c)3 IRS non-profit designation. Method was incorporated as a California non-profit public benefit corporation, but the 501(c)3 designation has been pending for some time due to an oversight. This is being corrected now.

The board president is knowledgeable and leads meeting firmly; other member participation is limited. Board composition does not cover all of the specific skills and experience identified in charter.

Method School founders and Board members have agreed to hold twice as many meetings next school year to amplify the collaboration and input each Board member contributes and create a stronger community.

All current board members have served since 2013, terms not staggered, nominating committee referenced in charter has not been used, and no parent representative on the board. In addition, School Advisory Committee designed to advise on governance issues has not been formed, although efforts have been made to develop online community of parents (although not intended to advise governance).

In hopes of developing a Parent Advisory Committee, Method Schools has developed a full program of Parent Workshops to build a community of parents invested in their students and Method Schools. Every other Wednesday, Method staff facilitate parent workshops that help parents become more involved and engaged in their student's educational program. Past topics have included:

- How to keep students engaged in learning
- How to prepare for high school
- How to prepare a student athlete for high school

- **How to use your student's test data to help your student learn**

Each Parent 2 Parent provides an opportunity for parents to discuss, ask questions, and provide feedback to Method. Parent participants are asked to deliver feedback in each session as well as through a feedback survey. The formation of the Parent 2 Parent group is a key building foundation for further communication and dialogue between Method and its parent stakeholders.

Solid set of board-adopted policies, but bylaws need updating to match current law and address inconsistencies in governing board terms and composition.

During our June Board meeting, Method Schools will discuss preferred term policies and update bylaws to reflect so.

Is the organization operated and governed effectively?

◇ Lapse with respect to federal tax status is significant and potentially costly.

Response above

Board appears to be effective, although neither meetings nor leader evaluation are focused around identified school goals and performance outcomes.

Method Schools goes above and beyond in this area and has thoroughly defined goals for each school year and every meeting pertains to meeting those goals. All of this data is stored in a comprehensive performance management system that all staff is evaluated against.

Here are screen shots of each OKR:

app.7geese.com/objective/561708

ME OBJECTIVES 1-ON-1s RECOGNITION FEEDBACK REVIEWS

methodschools.org

PERSONAL OBJECTIVE Close objective Actions

Academic Growth

Enter details, links, and why achieving this objective is important...

Set on April 18, 2019

Jul 01, 2018 Jun 30, 2019 Public

Aligned Objectives Edit

No objectives aligned [Align this objective](#)

People (8) Edit

You own this objective

OWNERS (1)

- Jessica Spallino, CEO

STAKEHOLDERS (7)

- Jade Fernandez, Head of Schools
- Amy Pinter, Programs Coordinator/ Teacher (5)
- Rachel DeSena, ELA Lead (2)
- Sabrina Godshaw, AIM/SSM Lead (8)
- Bryan Reinecke, Math/Data Lead (1)

Progress Remind me to check in every Friday Check in

80%

KEY RESULTS (3)

- 73% 90% of all students demonstrate a minimum of full year growth
- 75% 85% of students performing at grade level
- 90% 40% of students meet or exceed CAASPP standards in Math and 50% in ELA

Objective Feed Filter Post

app.7geese.com/objective/569545

ME OBJECTIVES 1-ON-1s RECOGNITION FEEDBACK REVIEWS

methodschools.org

PERSONAL OBJECTIVE Close objective Actions

Improvement of Practices

Enter details, links, and why achieving this objective is important...

Set on May 4, 2019

Jul 01, 2018 Jun 30, 2019 Public

Aligned Objectives Edit

No objectives aligned [Align this objective](#)

People (8) Edit

You own this objective

OWNERS (1)

- Jessica Spallino, CEO

STAKEHOLDERS (7)

- Jade Fernandez, Head of Schools
- Amy Pinter, Programs Coordinator/ Teacher (6)
- Rachel DeSena, ELA Lead (1)
- Sabrina Godshaw, AIM/SSM Lead (1)
- Bryan Reinecke, Math/Data Lead (1)

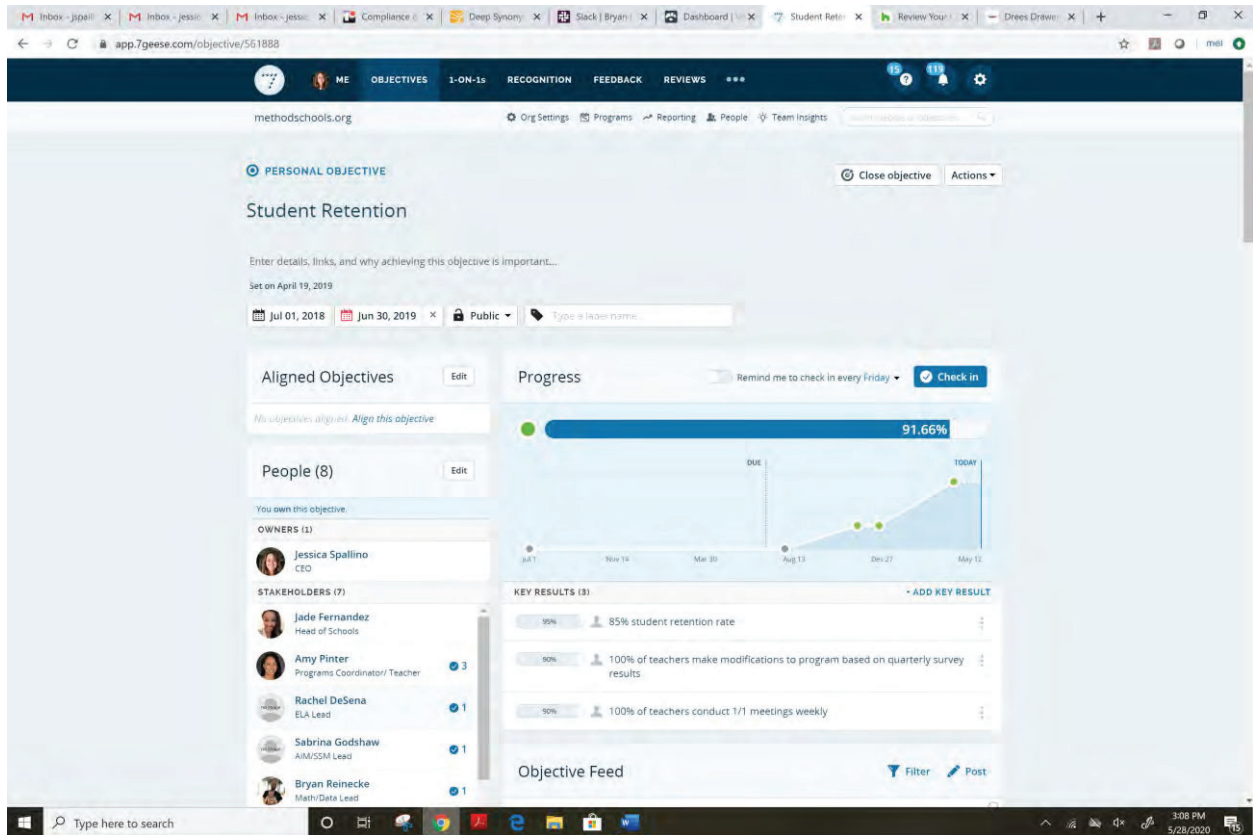
Progress Remind me to check in every Friday Check in

100%

KEY RESULTS (3)

- 100% 1-2 Modifications to instructional practice
- 100% 1-2 Enhancements to tools used
- 100% 4 Contributions to Method Compliments

Objective Feed Filter Post



Is the school meeting public policy purposes?

◇ Violation of IRS requirements is contrary to public policy. School is not meeting public policy purposes related to parent/community engagement in governance.

Noted above

Oversight Checklist Risk Assessment: Low Overall Assessment Score: Moderate

Recommendations:

- Request an explanation for failure to obtain IRS 501c3 determination, along with plan for determining potential liabilities and copies of all documents filed with the IRS to address the situation.

Noted above

- Request revision of bylaws and charter to establish consistent standard and process for board composition, recruitment, nomination, election and terms. Revision should include a reasonable, workable process for stakeholder engagement in governance.

Noted above

Finance/Business

No Recommendations

Personnel:

Concerns Even though Method is at a 5 (Moderate) risk level, Personnel Checklist items and areas of concern are:

P-5 Since there was no tracking system for TB tests, 12 employees were not complete. HR is requiring that all are completed by 4/30/20. I recommended that they contract with a local health provider lab and bring one onsite to complete all 12 at one time. This would be a more convenient and cost-effective process for HR and employees. Employees have to take time off to complete the TB process and HR provides a reimbursement. Note: Not sure when this will be corrected because of the coronavirus situation.

As noted above, completing this requirement has been delayed due to COVID-19. Our last meeting with Ms. Free was on 3/10/20, and all employees began working fully remote as of 3/13/20 due to the sudden change in regulations before we were able to coordinate a TB testing date onsite. As soon as we are able to safely and responsibly begin having employees meet with a healthcare provider, we will arrange a TB test schedule with a revised deadline. In addition, we have recently transitioned to the Zenefits HR platform which utilizes a “compliance assistant” tool which allows due dates to be set for critical documents such as TB tests, in order ensure proactive compliance moving forward. Employee records are maintained here as well as in the Excel file provided during site visit.

P-7: Method Charter (being less than 50 employees) has not required any anti-harassment training for any employees.

While Method still has less than 50 employees, this is a valuable training for all staff that Method will add to our annual training calendar for the 20-21 school year.

P-9: No 12 weeks of job-protected unpaid parental leave.

Although no formal parental leave policy has been in place, there have been no previous requests for parental leave, and no employee has been denied this right. Method is currently reviewing all options and legal requirements in order to implement a parental leave policy for the 20-21 school year to ensure our employees have ample leave and job protection to meet and exceed regulations.

P-10: No provision for protected leave and sick leave as it pertains to child and relative care laws.

As noted in P-9, Method is currently reviewing options for policy implementation for the 20-21 school year. Method maintains an unlimited PTO policy in order to support all employee needs for time off.

P-11: Governing Board does not approve personnel actions.

Method's Board has not customarily approved personnel actions; however, this topic will be readdressed with our Board and added as a discussion item to our upcoming June 9th, 2020 meeting agenda.

P-13: Professional Development (PD): PD was not as extensive as other charters. Method is moving towards adding links online for additional PD for staff.

Method provides ample opportunities to our staff for PD and we actively encourage employees to seek PD beyond what we provide in-house. We are currently compiling our 20-21 formal PD schedule which provides PD options for staff in all departments. In addition, at our June 9th, 2020 Board meeting, the Board will be presented with our Professional Development Policy which provides an annual allotment for out-of-house PD per each staff member.

P-17: HR administration has not started annual formal evaluations. HR currently completes bi-weekly/ monthly objective progress checks. There is also a monthly career development reflection review.

Method's 1:1s allow each staff member to meet frequently with their respective manager in order to evaluate his/her performance and progress on personal OKRs. These sessions take place using the 7 Geese performance management system and focus on coaching for employee growth. Beginning in the 20-21 school year, performance management will move to Zenefits which will carry over our existing 1:1 templates and provides additional employee review options which we can use for more formalized annual evaluations if desired.

Oversight Checklist Risk Assessment: Moderate

Recommendations:

Excel data or other system to house the information needed for future audits.

Noted above

Even though both of the informal evaluation processes looked effective, it is recommended to begin an annual formal evaluation process to take place. It was suggested that Method get evaluation samples from Dehesa or the local County Office of Education human resources services for certificated and classified (support) staff evaluations.

Noted above

Require staff to complete the online anti-harassment training for managers and non-managers as part of professional development for staff.

Noted above

Educational Program

Concerns:

Achievement and graduation rates are low

Method Schools offers a layered approach to instruction that gives students opportunities to engage in learning - one on one with their teacher, in synchronous and asynchronous online class environments. Through web conferencing, students interact with all their teachers.

Due to the cancellation of the CAASPP test, we are unable to provide CAASPP testing data. Therefore, we rely on our internal diagnostic data to measure the effectiveness of our overall educational program.

In order to continually meet the needs of our students, Method Schools has created a new role of Data Coordinator to oversee the collection and analysis of schoolwide data. Designated teachers work together with the data coordinator to help analyze and track data, coming to findings that are utilized to guide our curricular and instructional teams.

Our graduation rate is an area of focus for us and in response to low graduation rates, Method is building a guidance counseling department. Two staff members are currently in the process of obtaining a counseling credential. With the development of a full-fledged counseling program will allow Method to better track our students progress toward graduation and ultimately to their future college and careers.

Special Education

Concerns

The visit and follow-through of submitting compliance evidence met practically all checklist items. Being a leased commercial site, some documentation was not applicable.

Corrective Actions

1. Under Policies and Procedures, pg. 23, it was noted that the last Memorandum of Understanding (MOU) between the Dehesa School District and Method School dated 7/1/14 and signed on 12/13 expired on 6/30/17.

Method Schools has no yet received any updated MOUs from Dehesa at this time.

2. Under IEP/Timeline Compliance, pgs. 23 – 24 of the Report of Findings/Recommendations, it was noted that Service Tracking was not inputted into SEIS and it was noted to consider using Service Tracker in SEIS or some other method.

This is resolved as all service providers have been documenting in SEIS since August 2019 and can be verified with report checks.

3. Under Staffing, pg. 24, it was noted that for face-to-face meetings the school should caution staff to always meet with another adult present.

This is resolved as all SPED staff members that conduct face-to-face meetings have been notified and currently everything is virtual.

Other issues not listed as corrective actions

4. Under Curriculum pg. 22, it was noted that in the past Method Schools used NPA contractors for APE and Speech that did not have NPA certification. EC 56366(d) in the Education Code requires districts/charter schools to ensure that NPA/NPA providers with whom its contract has met state certification standards.

This is in the process but is not listed as a corrective action. I have emailed all of our contractors to verify that they have NPA certification, and if they cannot produce it then we will have to use another certified provider or allow a reasonable amount of time to remedy the situation as long as Dehesa agrees.

5. It was noted that Method Schools does not have a procedural handbook for special education.

This has been resolved as we now have a handbook that was submitted to Dehesa for review.

6. Under State Assessment pg. 22, it was noted that for the Annual Performance Report for 2018-2019, Method Schools had a participation rate of 100% for English language arts and math, but no math or ELA achievement was reported in the school's Performance Indicator Review (PIR).

The reason why no Performance Indicators were reported for subgroups was because each subgroup population was too small to report statistics.

Method School

Method School: Governance

BINDER 3: GOVERNANCE DOCUMENTATION METHOD SCHOOL			
Tab	Description	Compliance Area(s)	Provided?
1.	Articles of Incorporation	G1	Y
2.	Bylaws	G1-G4, G6, G12	Y
3.	Approved Charter	G3, G6, G8, G12	Y
4.	Most Recent School Leader Evaluation	G5	Y
5.	List of Board Members	G7-G8	Y
6.	Board Member Biographies	G9-G11	Y
7.	Description of School and Community Demographics	G9	Y
8.	Completed Form 700s for Board Members and Leadership	G11	Y
9.	Annual Board Meeting Calendar	G12	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Tab	Description	Compliance Area(s)	Provided?
10.	Sign-in Sheet(s) from Brown Act Training	G13	Y
11.	Three Most Recent Board Meeting Agendas	G14-G15	N (more on website in minutes)
12.	Screenshot of Website with Posted Agenda	G14	Y
13.	Public Comment Description/Policy	G15	Y
14.	Three Most Recent Board Meeting Minutes	G16	Y
15.	Screenshot of Website with Posted Minutes	G16	Y
16.	Board Meeting Minutes Reflecting Review of Compliance with Education Code Section 49431.9 (Prohibiting Food/Beverage Advertisements)	G17	N
17.	Parent Handbook	G18	Y (same as student)
18.	Student Handbook	G18	Y
19.	Employee Handbook	G19	Y
20.	Complete Set of Board Policies	G20	Y
21.	Memorandum of Understanding	G21	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:
 Gail Greely
 Position of Assigned Staff Person:
 SSDA DCOT

METHOD SCHOOL GOVERNANCE OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Organizational Management</u>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<input type="checkbox"/> Articles of Incorporation (Binder 3, Tab 1) <input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	Form 990 for 18-19 (due May 2020) was provided, with the box checked indicating that the application for 501c3 status is pending. Given that the corporation was formed in 2013, this is a substantial concern. Charter is at risk of penalties for failing to file earlier 990 returns, and at risk of penalties and back taxes for the period more than 27 months prior to approval of the 501c3 application.
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)	X		Standard bylaws (Oct 2013); contrary to bylaws, board terms are not staggered; minor updates may be needed to address meetings, records and conflicts to be consistent with current law
G3	Any changes to charter or bylaws have been approved by charter school's governing board and submitted to the authorizer.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)	X		No revisions to bylaws since 2013
G4	There is a clear distinction between responsibilities of governing board and administration.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)	X		No evidence of blurred governance lines

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G5	Governing board has a robust process for evaluating the charter school leader.	<input type="checkbox"/> Most recent charter school leader evaluation (Binder 3, Tab 4)	X		Per minutes, evaluations performed annually with board input; forms lack goals or school outcomes for leadership accountability
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3) <input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q2) <input type="checkbox"/> Teacher interview (Binder 1, Tab 4, Q1)		X	Charter calls for School Advisory Committee, but school found it difficult to implement; school holds Parent2Parent sessions to build on-line community – not clear how this advises governance. Per bios, no current board member is a parent of a Method student (per charter, “One seat on the Board will be reserved for a parent of a student currently attending Method Schools”); parent surveys have been conducted (per minutes).
Composition					
G7	Charter school has a list or roster of governing board members.	<input type="checkbox"/> List of board members (Binder 3, Tab 5)	X		
G8	Composition of governing board is consistent with approved charter.	<input type="checkbox"/> List of board members (Binder 3, Tab 5) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)		X	According to list provided, board membership has not turned over in 7 years; no nominating committee (per charter); no parent representative on board; not using staggered terms provided in bylaws; does not include all areas of expertise identified in charter
G9	Governing board is diverse and reflects charter school and community population.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Description of school and community demographics (Binder 3, Tab 7)		X	Board is racially diverse, but not as representative as anticipated by charter provision for a parent member

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G10	Governing board members have experience in key areas, such as education, finance, legal, real estate, and fundraising.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6)	X		Members have background in education, marketing and non-profit management; finance would be a good addition
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Completed Form 700s (Binder 3, Tab 8)	X		Free of conflicts as far as can be discerned from the Form 700s, Form 990, and the bios
Meetings					
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.	<input type="checkbox"/> Annual governing board meeting calendar (Binder 3, Tab 9) <input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)	X		Full annual schedule not posted on website (just upcoming meetings); calendar provided calls for 7 meetings; in prior years board seems to meet about quarterly with a few special meetings
G13	Governing board members receive annual training regarding Brown Act requirements.	<input type="checkbox"/> Sign-in sheet from Brown Act training (Binder 3, Tab 10)	X		Cannot verify if annual – last one February 2019
G14	Meetings are noticed in accordance with the Brown Act.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 12)	X		
G15	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Public comment policy (Binder 3, Tab 13)		X	Instructions are clear and comprehensive, but do not include provision for extra time for non-English speakers.
G16	Minutes are approved and thereafter made available to the public.	<input type="checkbox"/> Sample meeting minutes (Binder 3, Tab 14) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 15)	X		Posting of minutes on website goes back historically, but recent minutes seem slow to post (Sept 2019 most recent)

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G17	Governing board annually reviews charter school's compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	<input type="checkbox"/> Board meeting minutes (Binder 3, Tab 16)		X	According to governance binder, this was to have been taken care of Nov 19, 2019 meeting, but minutes do not include this item, unless embedded in revised board policy manual, which was not described in enough detail to confirm.
Board Policies					
G18	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<input type="checkbox"/> Parent handbook (Binder 3, Tab 17) <input type="checkbox"/> Student handbook (Binder 3, Tab 18) <input type="checkbox"/> Employee handbook (Binder 3, Tab 19)	X		
G19	Governing board has adopted policies related to conflict of interest.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		2014 version may need to be updated in light of changes in law; also made consistent with bylaws
G20	Governing board has adopted policies related to student discipline and due process.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G21	Governing board has adopted policies related to complaints and investigations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G22	Governing board has adopted internal control policies (and related forms and systems).	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G23	Governing board has adopted policies related to bank signature authorizations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		In bylaws; reflected in board action
G24	Governing board has adopted policies related to allowable purchases and purchasing authority.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G25	Governing board has adopted policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G26	Governing board has adopted policies related to employee harassment.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G27	Governing board has adopted and annually updates its safety plan to include all legal requirements applicable to charter schools.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		No board policy describing process for updating safety plan on an annual basis, but safety plan exists and was revised 11/19/19
G28	Governing board has adopted policies related to immunization records.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G29	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G30	Governing board has adopted policies related to Section 504/IDEA compliance.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
Education Code Assurances					
G31	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q3)	X		
G32	Charter school has complied with assurance that it shall not charge tuition.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q4)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G33	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.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q5)			
G34	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).	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q6)	X		
G35	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.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q7)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G36	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.	x Executive director (or equivalent) interview (Binder 1, Tab 3, Q8)	X		
G37	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	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q9)	X		
Memorandum of Understanding					
G38	Charter school has complied with terms of current memorandum of understanding, if applicable.	<input type="checkbox"/> Memorandum of understanding (Binder 3, Tab 21)			MOU provided terminated on June 30, 2019 at renewal; no subsequent agreement; unable to confirm if the charter (or the district) complied with all terms, which for charter would primarily be complete on-time reporting

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Complaint Policies & Procedures					
G39	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom.	<input type="checkbox"/> Board policies (Binder 3, Tab 20) <input type="checkbox"/> Observation of classrooms (Binder 1, Tab 10, Q5)	X		Policies adopted No classrooms
G40	Complaint policies and procedures are available in the main/front office.	x Observation of main office (Binder 1, Tab 11, Q1)	X		Policies adopted
Total "No" Responses: 6					
Risk Assessment: 0-10 Low 11-20 Moderate 21+ High					

Method School: Finance and Business
Assigned District Staff Person: Tom Krzmarzick
Position of Assigned Staff Person: Finance/Business Lead

METHOD SCHOOL FINANCE/BUSINESS OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Budget, Accounting, and Financial Reporting</u>					
F1	Governing board policies address budget, accounting, and financial reporting.	<input type="checkbox"/> Board policies (Binder 6, Tab 1)	√	<input type="checkbox"/>	Board adopted fiscal policies BP 2017-1 for Fiscal Policies. Policies fairly "boiler plate." School working on customizing the policies and procedures to reflect specific processes of school. Evidence the policies were sufficient for fiscal operations.
F2	Current budget has been approved by the governing board.	<input type="checkbox"/> Current/adopted budget (Binder 6, Tab 2) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 3)	√	<input type="checkbox"/>	Alternative SACS Form for Adopted Budget utilized. Copies of Board Agenda and Meeting Minutes reviewed. Documents provided provide verification of current budget (2nd Interim update), as well as adopted budget approved by the School Board.
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.	<input type="checkbox"/> Board meeting minutes (Binder 6, Tab 4) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q3)	√	<input type="checkbox"/>	Per the Board Meeting Minutes, Agendas, presentations of fiscal reports presented, there is sufficient evidence the school has a clear process for reviewing the budget and related updates throughout the year.
F4	Budget aligns with charter school's current LCAP or update to LCAP.	<input type="checkbox"/> Current budget (Binder 6, Tab 2) <input type="checkbox"/> LCAP/LCAP update (Binder 6, Tab 4)	√	<input type="checkbox"/>	LCAP Report Included in Binder 6 (Business & Finance). Aligned with school budget
F5	Budget provides for all financial	<input type="checkbox"/> Current budget (Binder 6, Tab 2)	√	<input type="checkbox"/>	Financial records/reports demonstrate budget provides for all financial obligations

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	obligations.				Separate budget/fiscal narrative presented to Board during each required state fiscal reporting period
F6	Governing board approves all required financial reports.	<input type="checkbox"/> Required financial reports (Binder 6, Tab 5) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 6)	√	<input type="checkbox"/>	School Board Meeting Agendas & Minutes demonstrate approval of all required financial reports (Budget, 1st/2nd Interim, Uas)
F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 7)	√	<input type="checkbox"/>	Submission of adopted budget submitted and included in Binder 6 (Business/ Finance) data, and during interview/meeting with CFO and Business Back Office support staff
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 8)	√	<input type="checkbox"/>	Submission of 1st Interim Report included in documents (Book 6) reviewed during interviews
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 9)	√	<input type="checkbox"/>	Submission of 2nd Interim Report included in documents (Book 6) reviewed during interviews
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 10)	√	<input type="checkbox"/>	Unaudited actuals included in data provided during interviews/meetings. Board approved
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	Every fiscal report or budget included separate accounts for restricted revenues & expenditures
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	At each required reporting period (Budget, 1st/2nd Interim) cash flow reports are included in fiscal projections presented to school board for review

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F13	Charter school's business accounting system complies with state accounting and reporting requirements.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q4)	√	<input type="checkbox"/>	School's accounting system complies with state accounting and reporting requirements. Reports of school's financials represented via SACS alternate form
<u>Audit</u>					
F14	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.	<input type="checkbox"/> Proof of submission of auditor certification and contract (Binder 6, Tab 11) <input type="checkbox"/> Director of finance (or equivalent) interview ((Binder 1, Tab 2, Q5)	√	<input type="checkbox"/>	Wilkinson, Hadley, King - State approved auditors utilized by the school Submission requirements to authorizer and SDCOE met
F15	Charter school has developed auditing schedule/timeline.	<input type="checkbox"/> Auditing schedule/timeline (Binder 6, Tab 12)	√	<input type="checkbox"/>	Brief timeline presented during interview, meetings
F16	Charter school has submitted prior year's financial audit to authorizer.	<input type="checkbox"/> Previous year's audit (Binder 6, Tab 13) <input type="checkbox"/> Proof of submission (Binder 6, Tab 14)	√	<input type="checkbox"/>	Audit results provided during interview/meetings
F17	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	<input type="checkbox"/> Corrective plan of action (Binder 6, Tab 15) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q6)	<input type="checkbox"/>	<input type="checkbox"/>	No deficiencies noted. N/A
<u>Financial Condition</u>					
F18	Charter school maintains an appropriate level of reserves for economic uncertainties.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1,	√	<input type="checkbox"/>	Current projections call for an ending balance of \$1.9M on a revenue base of approx. \$5M

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F19	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q8)	√	<input type="checkbox"/>	Every required fiscal reporting period the school prepares and presents to the Board a Multi-Year projection that includes the current year and two future years
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.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q9)	√	<input type="checkbox"/>	Yes. As mentioned above in section 18, there is sufficient level of reserves for the school for the current year and also in the 2 future year projections
<u>Cash Receipts</u>					
F21	Charter school has policies addressing cash receipts.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16)	√	<input type="checkbox"/>	Sample documents of cash receipts provided and reviewed during interview/meetings
F22	Charter school maintains records of all monies received (e.g., issues receipts).	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash receipts (Binder 6, Tab 17) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q10)	√	<input type="checkbox"/>	Yes. Sample documents provided and reviewed during interview/meetings
F23	Charter school deposits monies in a timely manner.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q11)	√	<input type="checkbox"/>	When required, deposits completed in a timely manner. As evidenced by samples provided
F24	Charter school maintains records of deposits	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash deposits	√	<input type="checkbox"/>	Yes, records of 3 sample cash deposits

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	of all monies.	(Binder 6, Tab 18) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q12)			reviewed.
F25	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q13)	√	<input type="checkbox"/>	Back office business support reconciles Bank Statements to ensure receipt and deposit accurately reported. School utilizes Bank of America for banking services
<u>Disbursements</u>					
F26	Charter school has policies addressing disbursements.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19)	√	<input type="checkbox"/>	Per BP 2017-1 Provided in Binder 6 (Business/Finance)
F27	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.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q14)		√	Per school policies, all 3 components of disbursements required. However, in some instances when credit card purchases made copies of receiving documents may not be evident
F28	Checks are signed by authorized employees.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q15)	√	<input type="checkbox"/>	Yes, per Fiscal Policies & Procedures - BP 2017-1 provided
F29	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q16)	√	<input type="checkbox"/>	Per back office business support, system is maintained for vendor info 1099 prep

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F30	Charter school has segregated duties between purchasing, receiving, and accounts payable.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q17)	√	<input type="checkbox"/>	Per BP 2017-1 provided, segregated duties required of purchasing process
<u>Payroll</u>					
F32	Charter school has a salary schedule or other satisfactory salary structure.	<input type="checkbox"/> Salary schedule (Binder 6, Tab 21)	√	<input type="checkbox"/>	Included in Binder 6 (Business/Finance) provided to review team. Limited steps in schedule
F33	Tax deposits are completed in a timely manner.	<input type="checkbox"/> Proof of tax deposits (Binder 6, Tab 22) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q18)	√	<input type="checkbox"/>	Copies of tax deposits provided. Demonstrate deposited completed in timely manner
F34	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	<input type="checkbox"/> Proof of recording of earnings (Binder 6, Tab 23) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q19)	√	<input type="checkbox"/>	School does not offer PERS/STRS to its employees. Social Security properly recorded via payroll
F35	Charter school has system to provide STRS data to authorizer.	<input type="checkbox"/> Proof of submission of STRS data (Binder 6, Tab 24) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q20)	√	<input type="checkbox"/>	Not applicable. STRS not offered to school employees
F36	Charter school has system to maintain employee earning records for preparation of W-2s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q21)	√	<input type="checkbox"/>	Payroll processing provided evidence of appropriate maintaining of earning records for preparation of W2s
<u>Equipment Inventory</u>					

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F37	Charter school has policies addressing the purchase and maintenance of equipment.	<input type="checkbox"/> Equipment purchase and maintenance policy (Binder 6, Tab 25)	√	<input type="checkbox"/>	Per BP 2017-1 provided.
F38	Charter school maintains an equipment inventory that is physically located on each site.	<input type="checkbox"/> Equipment inventory (Binder 6, Tab 26)	√	<input type="checkbox"/>	Copy of inventory schedule provided during interview/meetings
F39	Equipment purchased with federal funds is properly identified.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q22)	√	<input type="checkbox"/>	Copy of inventory schedule provided during interview/meetings
<u>Student Attendance (All Schools)</u>					
F40	Charter school uses a generally approved attendance accounting system.	<input type="checkbox"/> Screenshot of attendance accounting system (Binder 6, Tab 27)	√	<input type="checkbox"/>	Per accounting via restricted resource codes, equipment, if any identified
F41	There is a designated staff person responsible for administering attendance.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20)	√	<input type="checkbox"/>	CFO and his support staff responsible for attendance accounting
F42	Charter school calendar includes a minimum of 175 instructional days.	<input type="checkbox"/> School calendar (Binder 6, Tab 28)	√	<input type="checkbox"/>	Calendar provided during interview/meetings provided evidence of sufficient minimum number of instructional days
F43	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).	<input type="checkbox"/> Class/bell schedule (Binder 6, Tab 29)	√	<input type="checkbox"/>	Noted N/A, Assuming Method Schools don't offer STRS to EE's
F44	Student absences are excluded from apportionment days.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q1)	√	<input type="checkbox"/>	Review of sample attendance report for October 2019 provided evidence that student absences are excluded from apportionment days

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F45	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q2)	√	<input type="checkbox"/>	Review of teacher credentials for teachers' registers claiming ADA provides evidence via HR Lead of DCOT credentialing audit of certificated staff
F46	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 31)	√	<input type="checkbox"/>	Documents provided for review confirmed submission of all attendance to authorizer as well as CDE
F47	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)		√	Review of enrolling process indicates school has clear procedures for enrolling students. However, the school enrolls significant number of students (approx. 2,000) during the summer months. School is diligent in its communications and correspondence to district's where students were enrolled prior to enrolling at Method Charter School. At the end of summer, students typically return to previous district where they were enrolled before summer.
F48	Charter school has clear procedures for disenrolling students and providing notification to the student's district of residence.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)		√	For the example noted in item 47 above, school has a clear process for disenrolling students from its program during the summer. However, it is uncertain whether or not the students' district of residence prior to summer school disenrolls the students before they enroll at Method. Appears to be a state-wide process issue that could result in more than 1 ADA per student being claimed for a given year due to this summer school enrollment issue. The school demonstrated its due-diligence in its efforts to notify the previous district

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F49	Charter school has clear procedures for claiming and reporting ADA to the state.	<input type="checkbox"/> Policies and procedures related to claiming and reporting ADA (Binder 6, Tab 33)	√		or school of the student enrolling in Method during the summer. Evidence of the notification process demonstrated sufficiently.
F50	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	<input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q3)	√	<input type="checkbox"/>	Policies and procedures noted were clearly sufficient for the schools' claiming and reporting of ADA to the state Per process review and sample ADA reports, school demonstrated it ensures students are not enrolled in more than one track for apportionment claiming purposes
<u>Student Attendance (Schools Offering Independent Study)</u>					
F51	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).	<input type="checkbox"/> Certification (Binder 6, Tab 34) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q1)	√	<input type="checkbox"/>	Evidence provided to Instructional Lead of DCOT during review of Independent Study courses provided to students. Instructional Lead of DCOT verified rigor of courses
F52	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q1) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q1) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q2)	√	<input type="checkbox"/>	Per Educational Lead of DCOT, communication with teacher and students occur minimally at least twice a month
F53	Charter school retains evidence of satisfactory educational progress for each independent study student, including a file	<input type="checkbox"/> Sample grade books (Binder 6, Tab 35) <input type="checkbox"/> Sample transcripts (Binder 6, Tab 36)	√	<input type="checkbox"/>	Review of sample list of student grade books, transcripts and work samples provided evidence of process for ensuring satisfactory progress for independent study

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	of representative samples of each student's work products (signed/initialled and dated by supervising teacher).	<input type="checkbox"/> Work samples (Binder 6, Tab 37) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q2)			students. Instructional Lead of DCOT provided review of appropriateness of credit given to students
F54	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).	<input type="checkbox"/> List of course offerings (Binder 6, Tab 38)	√	<input type="checkbox"/>	Course listings provided in Binder 6 (Business/Finance) Instructional Lead for DCOT reviewed course list for compliance and confirmed course offerings
F55	The program of each student in independent study is overseen by a certificated employee.	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q4) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q3)	√	<input type="checkbox"/>	Per review of HR Lead of DCOT, compliance of student independent study work overseen by a certificated employee
F56	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).	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q2) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q4)	√	<input type="checkbox"/>	Review of sample ADA report by teacher by student provided evidence school met ratio of ADA to FTE Certificated employees
F57	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	<input type="checkbox"/> Board policy (Binder 6, Tab 40) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q5) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q5)	√	<input type="checkbox"/>	Documents provided during review/meetings indicated policy exists regarding maximum length of time that may eclipse between independent study assignment and completion. Item also reviewed by Instruction Lead for DCOT

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	completion.				
F58	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.	<input type="checkbox"/> Board policy (Binder 6, Tab 41) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q6) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q6)	√	<input type="checkbox"/>	Documents provided during review/meetings indicated policy exists regarding number of missed assignments allowed before an evaluation is conducted showed evidence of sufficient policy. Instructional Lead for DCOT also reviewed item for appropriateness
F59	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	<input type="checkbox"/> Sample agreements (Binder 6, Tab 42) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q7) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q7)	√	<input type="checkbox"/>	Per samples and process reviewed during interviews/meetings, evidence of agreements being on file for each student on Independent Study is sufficient
F60	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q3)	√	<input type="checkbox"/>	Per Special Education Lead for DCOT, confirmed students don't participate in independent study unless IEPs provide for placement. School is member of East County SELPA
F61	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q4)	√	<input type="checkbox"/>	Per review and interviews/meetings, no funds or items of value given to independent study students that are not provided to students attending regular classroom programs. Item really not applicable. All students are independent study students
F62	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	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q5)	√	<input type="checkbox"/>	All students reviewed are located in county which apportionment is reported or who are residents of a county immediately adjacent to the county in which apportionment is reported

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	the apportionment claim is reported.				
F63	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q6) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q8) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q8)	√	<input type="checkbox"/>	Documents provided during interview/meetings and review of sample student records, registers and work products demonstrated process of evaluating work of students is performed by certificated teachers. Also, see review by HR Lead of DCOT re this item
F64	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q7)	√	<input type="checkbox"/>	Documents provided during interview/meetings and review of sample student records, registers and work products coupled with teacher approval of work provides evidence school claims apportionment credit only for time value of student work judged by a certificated teacher. See review by HR Lead of DCOT for further confirmation
F65	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 type="checkbox"/> Request for determination of funding (Binder 6, Tab 44) <input type="checkbox"/> SBE determination of funding (Binder 6, Tab 45)	√	<input type="checkbox"/>	Request for funding determination as well as CDE issued funding determination was provided during interview/meetings
815-21/4533779.4		<i>If school does <u>not</u> offer independent study:</i> Total "No" Responses: 3		<i>If school <u>does</u> offer independent study:</i> Total "No" Responses: 3	
Risk Assessment: 0-12 Low 13-24 Moderate 25+ High		Risk Assessment: 0-16 Low 17-32 Moderate 33+ High			

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Method School: Personnel

Assigned District Staff Person: Cynthia R. Free

Position of Assigned Staff Person: Personnel Lead

METHOD SCHOOL PERSONNEL OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
All Employees					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 0-N/A 	✓	•	Approved Charter 6-2018 to 6-30-23(site visit) WASC 6 year beginning 2018
P2	Charter school employee handbook and policies guarantee fair hiring practices.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) 	✓	•	Employee policies are included in HB T-1
P3	Charter school enters employment contracts with all persons hired to work at school.	<ul style="list-style-type: none"> Sample employment contracts (Binder 5, Tab 5) 3 Samples 	✓	•	3 examples: Dir of Special Ed, Math teacher, Curriculum writer for 2019-20
P4	All employees have been fingerprinted, including Department of Justice background checks.	<ul style="list-style-type: none"> Documentation of fingerprint clearance for all employees (Binder 5, Tab 6) 	✓	•	Need a Staffing list to review data. Missing: Dustin Mathais (new employee) - received
P5	All employees have passed the TB test and results are current.	<ul style="list-style-type: none"> Documentation of current TB test results for all employees (Binder 5, Tab 7) 	✓		All will be completed by 4/30/20. Reviewed with Tracy/HR 12 employees still not complete. Not sure if it will be completed because of COVID19 shut down.
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 8) 	✓	•	showed 18 certificates. Need staffing list to review Staff list shows 38 employees at site visit - completed all-certificates submitted
P7	If a charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 9) 	✓		38 employees. Charter says anti-harassment not required Recommended that even with less than 50 employees supervisors should go through on-

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

					line training
No.	Compliance Area	Evidence to Review	Yes	No	Comments
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	<ul style="list-style-type: none"> Observation of main office (Binder 1, Tab 11, Q4) 	✓	•	Method Charter office in Murrieta has DFEH poster visible - 2 places verified at site visit
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 		✓	Only Pregnancy disability leave- 4 months Pgs 38-41 Employee HB
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 		✓	PTO only Pg 36
P11	Governing board approves personnel actions.	<ul style="list-style-type: none"> Governing board minutes (Binder 5, Tab 10) 		✓	No personnel actions listed for board to approve
Certificated Employees					
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	•	Org chart - too small to read. Received new staff list at site visit. 38 employees - 25 teaching staff Charter page 39 - 1-25 student ratio
P13	Charter school provides teachers with professional development opportunities.	<ul style="list-style-type: none"> Professional development calendar (Binder 5, Tab 12) Professional development session agenda (Binder 5, Tab 13) Teacher interview (Binder 1, Tab 4, Q2) 	✓	•	August-November 2019. Need Jan-July 2020 PD: New Hire training- Need other PD At site visit: Added additional PD through 4/2020 and explained on-going PD. - Weak. Could be better like other Charter or public schools. Recommended to have more PD for staff. Teacher interview completed at 2nd site visit - Science teacher and Lead teacher

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
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.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by core teachers (Binder 5, Tab 14) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓		<p>Again, too small to read! Need better Credentials list and assignments. - T-14/15</p> <p>Received at 1st site visit Charter approval date 2018-2023 Reviewed new list of teacher and credentials - All teachers are appropriately credentialed in core area.</p>
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by teachers (Binder 5, Tab 15) 	✓		<p>No T-15 Again, too small to read! Received new Org chart and staff list with assignments. All teachers have EL authorizations</p>
P16	Teachers providing special education and related services have required credentials and certifications.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by special education teachers (Binder 5, Tab 16) 	✓		<p>Again, too small to read! No T-16 in binder for Special Ed. Received new Org chart and staff list with Assignments to verify Sp Ed teacher and credentials. 2 Special Ed teachers. 1 is fully credentialed and 1 has a Short Term Permit. Enrolled in the program - OK Cleared</p>
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	<ul style="list-style-type: none"> Sample evaluations (Binder 5, Tab 17) Teacher interview (Binder 1, Tab 4, Q3) 	✓		<p>No T-17. Added at site visit with sample Interviews and evaluations. Recommend annual formal evaluations.</p>

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Classified Employees					
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.	<ul style="list-style-type: none"> • Staff organizational chart (Binder 5, Tab 11) • Documentation of qualifications held by classified aides (Binder 5, Tab 18) • Approved charter (Binder 5, Tab 3) • Employment-related MOUs (Binder 5, Tab 4) 	v		No T-18 Again, too small to read! Need classified(support) staff list and assignments. Received new Org chart and classified staff list to review documentation. Staff had college classes, degrees or credentials. OK

Total "No" Responses: 5 - Moderate 3/5/20/Cynthia Free DCOT/HR

Risk Assessment:

0-4 Low **5-8 Moderate** 9+ High

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Method School: Educational Program
Assigned District Staff Person: Linda Kimball
Position of Assigned Staff Person: Educational Program Lead

METHOD SCHOOL EDUCATIONAL PROGRAM OVERSIGHT CHECKLIST
Items specific to Special Education will be addressed in the Special Education Checklist in this Appendix

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<ul style="list-style-type: none"> • Approved charter (Binder 2, Tab 1) • Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) 	√	<input type="checkbox"/>	
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<ul style="list-style-type: none"> • Approved charter (Binder 2, Tab 1) • Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q1) 	√	<input type="checkbox"/>	
E3	Charter school staffing complies with approved charter.	<ul style="list-style-type: none"> • Approved charter (Binder 2, Tab 1) • Staffing chart (Binder 2, Tab 3) 	<input type="checkbox"/>	<input type="checkbox"/>	
E4	Charter school staffing is sufficient to carry out educational program.	<ul style="list-style-type: none"> • Staffing chart (Binder 2, Tab 3) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
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.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) 	√	<input type="checkbox"/>	
E6	Charter school has obtained WASC accreditation, if applicable.	<ul style="list-style-type: none"> WASC accreditation (Binder 2, Tab 5) 		<input type="checkbox"/>	
<u>Services to Special Populations</u>					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3) 	<input type="checkbox"/>	<input type="checkbox"/>	
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q4) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q5) 	<input type="checkbox"/>	<input type="checkbox"/>	
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> Sample IEPs (Binder 2, Tab 8) Sample 504 plans (Binder 2, Tab 9) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) 	<input type="checkbox"/>	<input type="checkbox"/>	
E11	All required members of IEP teams attend IEP meetings.	<ul style="list-style-type: none"> Sample IEPs (Binder 2, Tab 8) 	<input type="checkbox"/>	<input type="checkbox"/>	
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<ul style="list-style-type: none"> Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10) 	<input type="checkbox"/>	<input type="checkbox"/>	
E13	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"> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	
E14	Charter school follows process for identification and reclassification of students who are English Learners.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q7) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E15	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"> Student handbook (Binder 2, Tab 4) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q8) 	√	<input type="checkbox"/>	
<u>Curricular Materials</u>					
E16	Charter school uses standards-aligned instructional materials.	<ul style="list-style-type: none"> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Classroom observations (Binder 1, Tab 10, Q1) 	√	<input type="checkbox"/>	
E17	Charter school uses instructional materials that address the specific needs of English Learners.	<ul style="list-style-type: none"> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q9) Classroom observations (Binder 1, Tab 10, Q2) 	√	<input type="checkbox"/>	
E18	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"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q10) Classroom observations (Binder 1, Tab 10, Q3) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E19	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"> Class schedule (Binder 2, Tab 11) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q11) Classroom observations (Binder 1, Tab 10, Q4) 	√	<input type="checkbox"/>	
<u>Assessment</u>					
E20	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"> Assessment calendar (Binder 2, Tab 12) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) 	√	<input type="checkbox"/>	
E21	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607(b).	<ul style="list-style-type: none"> SBAC (Binder 2, Tab 13) Dashboard Data (Binder 2, Tab 14) 	<input type="checkbox"/>	√	Possibly not: Test scores are low, 7% of students opted out of testing, and the graduation rate is low.
E22	Charter school has completed and timely posted a SARC containing required elements.	<ul style="list-style-type: none"> SARC (Binder 2, Tab 15) 	√	<input type="checkbox"/>	
E23	Charter school regularly collects student achievement data and reports it to parents and staff.	<ul style="list-style-type: none"> Sample data reports to parents (Binder 2, Tab 16) Sample data reports to staff (Binder 2, Tab 17) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q13) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E24	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"> • Notifications (Binder 2, Tab 18) 	√	<input type="checkbox"/>	
E25	Charter school has current LCAP/LCAP Update that has been presented to, reviewed and approved by the Charter School's governing board.	<ul style="list-style-type: none"> • LCAP/LCAP update (Binder 2, Tab 19) • Minutes from Board meeting (Binder 2, Tab 20) 	√	<input type="checkbox"/>	
E26	Title I funds/categorical funding are being used to supplement the school's LCAP goals.	<ul style="list-style-type: none"> • LCAP/LCAP update (Binder 2, Tab 19) • Director of finance (or equivalent) interview (Binder 1, Tab 2, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Admissions</u>					
E27	Charter school complies with the admissions practices described in the approved charter.	<ul style="list-style-type: none"> • Approved charter (Binder 2, Tab 1) • Admissions/enrollment forms and policies (Binder 2, Tab 21) • Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<ul style="list-style-type: none"> • Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	<ul style="list-style-type: none"> Charter school student data (Binder 2, Tab 23) Student data from nearby school districts (Binder 2, Tab 24) 	√	<input type="checkbox"/>	
E30	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 cover options and enrollment assistance information.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	
E31	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.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Discipline</u>					
E32	Charter school discipline policies and practices are consistent with terms of charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E33	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.	<ul style="list-style-type: none"> • Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q14) 	<input type="checkbox"/>	<input type="checkbox"/>	
E34	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"> • Discipline data (Binder 2, Tab 26) • Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Health and Safety</u>					
E35	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.	<ul style="list-style-type: none"> • School safety plan (Binder 2, Tab 27) 	<input type="checkbox"/>	<input type="checkbox"/>	
E36	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"> • Training sign-in sheets (Binder 2, Tab 28) • Observation of main office (Binder 1, Tab 11, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>	
E37	Charter school has a policy/procedure for visitors to enter and leave campus.	<ul style="list-style-type: none"> • Policy or procedure (Binder 2, Tab 29) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E38	Charter school provides for the screening of pupils' vision, hearing, screening for scoliosis, and required immunizations.	<ul style="list-style-type: none"> Records of student screenings (Binder 2, Tab 30) 	<input type="checkbox"/>	<input type="checkbox"/>	
E39	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"> Suicide Prevention Policy (Binder 2, Tab 31) Board meeting minutes (Binder 2, Tab 32) 	<input type="checkbox"/>	<input type="checkbox"/>	
E40	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 findings are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> Application for universal meal service (Binder 2, Tab 33) Governing board resolution (Binder 2, Tab 34) 	<input type="checkbox"/>	<input type="checkbox"/>	
E41	Charter school provides at least one meal per day to students who qualify for FRPL.	<ul style="list-style-type: none"> Executive director (or equivalent) interview (Binder 1, Tab 3, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	
E42	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"> Screenshot from website (Binder 2, Tab 35) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E43	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.	<ul style="list-style-type: none"> Sexual health and HIV prevention education course description (Binder 2, Tab 36) 	√	<input type="checkbox"/>	
E44	By January 1, 2020, 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.	<ul style="list-style-type: none"> Policy or other description of method for informing parents/guardians (Binder 2, Tab 37) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Parent Notifications</u>					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 38) 	<input type="checkbox"/>	<input type="checkbox"/>	
E46	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).	<ul style="list-style-type: none"> Notice (Binder 2, Tab 39) 	<input type="checkbox"/>	<input type="checkbox"/>	
E47	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"> Notice (Binder 2, Tab 40) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E48	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.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 41) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Student Records</u>					
E49	Charter school maintains comprehensive records regarding its students.	<ul style="list-style-type: none"> Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42) 	√	<input type="checkbox"/>	
E50	Charter school maintains student records, including special education records, in a confidential and secure location.	<ul style="list-style-type: none"> Policy regarding confidentiality of student records (Binder 2, Tab 43) Observation of main office (Binder 1, Tab 11, Q3) 	√	<input type="checkbox"/>	
E51	Charter school has a policy or procedure for parents to review student files, including a log.	<ul style="list-style-type: none"> Policy regarding review of records (Binder 2, Tab 44) 	<input type="checkbox"/>	<input type="checkbox"/>	
E52	Charter school has policy or procedure regarding release of student information.	<ul style="list-style-type: none"> Policy regarding release of student information (Binder 2, Tab 45) 	<input type="checkbox"/>	<input type="checkbox"/>	
E53	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q15) 	<input type="checkbox"/>	<input type="checkbox"/>	
815-21/4535127.4		Total "No" Responses: 14-26 Moderate 27+ High 0-13 Low			

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:
 JoAnn Murphy
 Position of Assigned Staff Person:
 Special Education Lead

METHOD SCHOOL SPECIAL EDUCATION OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<ul style="list-style-type: none"> √ Approved charter (Binder 2, Tab 1) √ Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) 	X		Has an MOU signed 4/15 which expired in 2017 Dehesa has direct oversight
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<ul style="list-style-type: none"> √ Approved charter (Binder 2, Tab 1) √ Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, 01) 	X		School has developed Smart Fox course modules customized to meet unique needs of students without losing the integrity of the A-G courses. All students with disabilities have access the curriculum with appropriate and differentiated instruction.
E3	Charter school staffing complies with approved charter.	<ul style="list-style-type: none"> <input type="checkbox"/> Approved charter (Binder 2, Tab 2) <input type="checkbox"/> Staffing chart (Binder, 2 Tab 3) 			All students access general education instruction supported by Student Success Managers and Academic Achievement Manager. Special Education Directors for elementary and high school oversee instruction and IEP process. General education teachers are involved in IEP

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E4	Charter school staffing is sufficient to carry out educational program.	1 Staffing chart (Binder 2, Tab 3) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2)			NPA contractors are used for APE and Speech Therapy. The speech contractor is not listed as a certified nonpublic agency provider. NPA certification is a requirement and must be verified or use another certified provider.
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.	<input type="checkbox"/> Student handbook (Binder 2, Tab 4)			N/C
E6	Charter school has obtained WASC accreditation if applicable.	<input checked="" type="checkbox"/> WASC accreditation (Binder, 2 Tab 5)	X		N/C
Services to Special Populations					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) None <input checked="" type="checkbox"/> CALPADS reports for Fall I submission (Binder 2, Tab 7) f. instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3)	X		There is no formal procedural handbook. The East County SELPA does not have one- the SELPA directors of special education voted against it; however, the SELPA provides training on key issues of compliance as they arise. Method would like to have a greater connection with the district/SELPA. There has been no connection in the past few years under different administrations.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> ✓ Student handbook (Binder 2, Tab 4) ✓ CALPADS reports for Fall I submission (Binder 2, Tab 7) ✓ Instructional leader (or equivalent) interview (Binder I, Tab 1, Q4) 	X		Well established SST process using a multi-tiered approach to interventions. Use a tiered approach without the rush to special education.
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> esPA policies and procedures manual (Binder 2, Tab 6) ✓ CALPADS reports for Fall I submission (Binder 2, Tab 7) ✓ instructional leader (or equivalent) interview (Binder I, Tab 1, QS) 	X		Review of SEIS files during the unannounced portion of the study indicated that the school adheres to all of the timelines in the IEP process.
Assessment					
E20	School does not enroll a small number of students disproportionately—the identification rates are consistent with both Dehesa and The Heights.	<ul style="list-style-type: none"> ✓ Assessment calendar (Binder 2, Tab 12) ✓ Instructional leader (or equivalent) interview (Binder I, Tab 1, Q12) 	X		Did not meet participation target of >95% in both math and ELA. Their rate was 89.47% (ELA) and 84.21% (math) which is higher than any of the other schools in the study. They do have a PIR ongoing. Needs oversight by Dehesa
E26	Title I funds/ categorical funding are being used to supplement the school's LCAP goals.	<ul style="list-style-type: none"> <input type="checkbox"/> LCAP/LCAP update (Binder 2, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab, 2 Q2) 			N/A

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Admissions					
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	√ Admission s/enrollment forms and policies (Binder 2, Tab 21)	X		The process is the same for students with disabilities with additional discussion of the interim 30 day IEP which will be reviewed to determine if the placement is appropriate.
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background students with disabilities, English learners , and FRPL students).	√ Charter school student data (Binder 2, - Tab 23) Student data from nearby school districts (Binder 2, Tab 24)	X		The FRPL is much lower in the charter school but the enrollment process is open to all students – no recommendations to change the enrollment process.
Discipline					
E32	Charter school discipline policies and practices are consistent with terms of charter.	√ Approved charter (Binder 2, Tab 1) √ Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25)			No suspensions or expulsions. Findings exceed state targets
E33	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 type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab I 014)			N/A

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E34	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	<input type="checkbox"/> Discipline data (Binder 2, Tab 26) <input type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25)	X		No suspensions or expulsions
Parent Notifications					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	V (Notice (Binder 2, Tab 38)	X		Parental Rights are also provided through procedural safeguards provided to the parent at each IEP and/or assessment request.
Student Records					
E49	Charter school maintains comprehensive records regarding its students.	V Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42)	X		
E50	Charter school maintains student records, including special education records, in a confidential and secure location.	<input checked="" type="checkbox"/> Policy regarding confidentiality of student records (Binder 2, Tab 43) <input type="checkbox"/> Observation of main office (Binder 1, Tab 11, Q3)	X		
E52	Charter school has policy or procedure regarding release of student information.	V Policy regarding release of student information (Binder 2, Tab 45)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff: Justin Cunningham
 Position of Assigned Staff Person: Project Lead

METHOD SCHOOL OPERATIONS/FACILITIES OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Maintenance of Facilities					
O32	A designated person is responsible for overseeing operations and facilities management.	√ Staff organizational chart (Binder 4, Tab 1)	X		Steve Bentley, Operations Lead Jade Fernandez, Head of Schools
O33	Facilities are adequate for number of students and types of programs.	<input type="checkbox"/> Capacity chart for campus facilities (Binder 4, Tab 2) √ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q1)	X		Transitioned from learning center to virtual: Over capacity
O34	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.	√ Inspection logs (Binder 4, Tab 3) √ Operations manager (or equivalent) interview ((Binder 1, Tab 5, Q2)			Fire Marshall Inspection, Condition inspections provided by Lessor
Legal Compliance					
O35	All facilities meet Americans with Disabilities Act requirements.	<input type="checkbox"/> ADA certification (Binder 4, Tab 4)		X	Commercial facility appears to meet ADA but there is no evidence to review
O36	All single-user restrooms have been designated as all-gender restrooms.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q3)	X		
O37	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan (Binder 4, Tab 5)	N/A		Commercial facility built after 1986, meets AHER
O38	Charter school has certificate of occupancy on file.	√ Certificate of occupancy (Binder 4, Tab 6)	X		Sent after visit

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O39	Charter school has conditional use permit on file, as applicable.	<input type="checkbox"/> Conditional use permit (Binder 4, Tab 7)	X		
O40	Charter school has safety inspection by local fire department on file.	<input checked="" type="checkbox"/> Safety inspection by local fire department (Binder 4, Tab 8)	X		
O41	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.	<input checked="" type="checkbox"/> Emergency action plan (Binder 4, Tab 9) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q4)	N/A		No athletics
O42	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q5)			N/A
O43	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q12)			N/A
O44	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	<input checked="" type="checkbox"/> Certificates of insurance (Binder 4, Tab 10)			Sent after visit
O45	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1.	Operations manager (or equivalent) interview (Binder 1, Tab 5, Q7)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O46	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 (Binder 4, Tab 11) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q8, Q9)	X		One site
O47	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 (Binder 4, Tab 11) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q10)	X		Site transitioned from learning center to headquarters of virtual school. Method plans to move to smaller office.
			Total "No" Responses: <u>1</u>		
			Risk Assessment: 0-4 Low 5-7 Moderate 8+ High		

The overall Method response to the Facilities and Operations Oversight was forthcoming and transparent.

815-21/4533461.4

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.



Dehesa Charter Oversight Report

Diego Hills Central

Diego Hills Central: Governance

Context

Diego Hills Central is a charter school within the Learn4Life branded network of 20 individual schools held by 10 different non-profit corporations and served by the Lifelong Learning Administration Corp. (“LLAC”). LLAC operates as two companies, doing business as Sequoia Administrative Resources and Scholastic Education Resources. The Diego Hills Central Public Charter is held by Diego Plus Education Corp., which also holds the charter for Diego Valley East Charter School (authorized by Julian Union Elementary District). The same governing board is responsible for both of these charter schools, although separate meetings are held. As with eight of the other nine corporations that hold the charters for Learn4Life schools, the board members are appointed by and serve at the pleasure of the sole statutory member of the Diego Plus Education Corp., Educational Advancement Corp. (“EAC”). Neither EAC nor LLAC have been subject to the same level of transparency and accountability as the charter schools themselves.

Concerns

- Charter material revision provided is misleading in its description of the governance structure, as it fails to mention the relationship to LLAC or EAC, to the other charter school governed by the same Diego Plus board, or the other charter schools with which it appears to share selection, compensation and evaluation of senior leadership (CEO, Superintendent, etc.). It says the school “may” utilize the services of administrative or educational providers without disclosing relationships in existence at the time of the revision (October 2019).
- Minutes show that the board elected an additional member in February 2019, contrary to the bylaws which state that directors are designated by the sole statutory member.
- It is evident from minutes and observation of the board meeting that the Diego Plus board is not active; asks few questions of management or “back office” provider from LLAC during meetings, leading to minimal discussion among the board members. No reference to key school goals or outcomes for the year.
- There is no evidence of an effort by the board or EAC to recruit members with particular knowledge and experience for board service; no nominating process. Officers (secretary and treasurer) are not members of the board, but employees shared with other schools in the network. This raises concerns about ability of the board to meet its independent fiduciary obligation to this school, rather than to other schools, to EAC (the “sole statutory member”) or to LLAC (which provides extensive administrative and educational services).
- Nothing in charter or bylaws seeks to engage community at governance level, even as advisory.
- According to IRS filings, board members were receiving compensation from the corporation. Although the bylaws authorize “a reasonable stipend,” none of the minutes reviewed included information on determination of stipend amounts or any connection to expenses incurred as a result of service on the board. Payments reported in the 17-18 fiscal year exceeded the amount that California elected school board members in districts of comparable size would have been permitted to receive under Ed Code Section 35120.
- Is the organization operated and governed effectively?
 - * Accountability is undermined by the corporate structure pursuant to which board members are selected by EAC, as sole statutory member. The board’s heavy reliance on management (including in evaluation of leadership) and lack of transparency into the operations of the administrative services provider and sole statutory member selecting board members all compromise the ability of the governing board to act independently in the best interests of the students, families, staff, and the general public .
- Is the school meeting public policy purposes?
 - * Operational and governance transparency are compromised; board capacity to hold management accountable for outcomes is undermined.

Oversight Checklist Risk Assessment: Low

Overall Risk Assessment: Moderate

Recommendations:

- Bylaws should be updated to be consistent with current legal requirements and such other changes as the organization may have made since 2011.
- Charter should be revised, with approval by Dehesa, to fully describe the existing governance structure and the relationship of the Diego Plus board to other organizations within the L4L-branded network. This should include how the board will be selected to be representative of the community served, how school leadership will be evaluated and held accountable for established outcomes, and how the board will ensure that it is making the best choices for the school in contracting for administrative and educational services.

Diego Hills Central: Finance/Business

Context

Review and analysis of documents provided by the charter school via information included in Binder 6 (Business/Finance) was performed before interviews and meetings with Diego Hills Central's staff. During the site visit on March 3, 2020, in Lancaster, CA, site of Diego Hills' administrative offices, I met with Diego Wohl, Sr. Vice President of Finance for Lifelong Learning Administration Corp (LLAC); Guita Sharifi, CFO for LLAC; and Lindsay Reese, Area Superintendent. Interviews of their team regarding the schools' business/fiscal processes and questions for further clarification information provided via the Business/Finance Binder (6) took place during most of the day. Due to the sheer volume of items (65) to be reviewed in this section, a scoring system using a formula from the number of "no" responses may not reveal the true risk assessment for the charter. From a strict formula calculation perspective, a score of less than 25% "no" responses or (3 out of 65), or 4.6%, indicates a low risk score per the checklist metric. However, after further research, data gathering, analysis and process reviews as a result of data provided and responses from the DHC and its support organization, Learn4Life, a risk rating of "Moderate" is warranted. Because of concerns noted below, two Risk Scores are provided for Diego Hills Central. An **Oversight Checklist Risk Assessment** based purely on a calculation of "no" responses to total responses, as well as an **Overall Risk Assessment** based on additional information provided, analysis, further research for understanding and process review.

It was noted during the review that all required reports and submittals to the authorizing district and or CDE were completed appropriately and timely. In addition, there was no reporting found of intercompany transfers between other charter schools supported by the Learn4Life organization. This is a positive sign of the fiscal reporting and budget processes of the school, and the school's accounts remaining separate from other schools supported by the Learn4Life organization. The working ability of the school's budgeting and fiscal reporting process was demonstrated in a positive fashion by its ability to revise its budgets as needed due to ADA changes. Specifically, for the 2019-20 school year, the school's budget process witnessed a significant drop in ADA due to its recent relocation to a new facility and implemented the required budget revisions to ensure fiscal stability. The school is projecting an Ending Balance of \$249,533 out of projected revenues of \$8.96M for the year.

Concerns

- Currently, the school is operating under a Service Agreement with Lifelong Learning Administration Corp (LLAC) doing business as Scholastic Education Resources (SER) and Sequoia Admin Resources (SAR) to provide these services. As part of the Service Agreement, the school pays LLAC a total of 15% of its revenues for these educational and business/administration back office services. The 15% charge is based on a

charge of 10% of the school's revenues to SER for educational support services and an additional 5% of the school's revenues is paid by the school to LLAC for business/admin services (SAR). From a project control perspective, additional cost estimates should be provided for the task components included in the scope-of-work details noted in the agreements.

- The organizational charts provided during the interview/meetings included a chart for the school, as well as an organizational chart for LLAC's organization. Per the LLAC's organizational chart provided during our interview, there were 10 charter schools under its overall umbrella with Diego Hills Central included as one of the 10 schools supported by LLAC via administration/business and educational services. A concern for the charter's ability to remain independent from LLAC's influence on its operations appears relevant due to the sheer size of the LLAC organization.
- Data retrieved from LLAC's Form 990 IRS filing for 2017 indicated a total of service revenues of approximately \$38.9M. In addition, it was noted that Dante Simi, serving as CEO, had listed reportable compensation of \$679,884 and Linda Simi, Executive VP, had listed reportable compensation of \$333,195 in the 2017 IRS Form 990. Three other highly-paid administrators earning over \$300,000 in compensation were also included in the 2017 IRS Form 990. Data for 2018's IRS Form 990 Report was not available. It was also noted the school entered into a loan agreement of \$4M during the current 2019-20 school with the LLAC organization providing the loan to the school. The significance of the figures and items noted above is the enormous size of the LLAC organization and its potential to influence the school operations. Upon review of related budget, and fiscal required reporting to the school board, there did not appear to be much discussion or narrative from the board and staff for any particular issues related to fiscal matters.

Oversight Checklist Risk Assessment: Low

Overall Risk Assessment: Moderate

Recommendations

- DHC should review specific costs of the type of support they are paying for via the 15% of revenues
- DHC should send out a request for proposals to a few Ed Admin and Business Back Office organizations requesting a specific scope of work and ask for "Basis of Estimates" on cost projections included in the proposals. This could be compared to current services and costs from LLAC.
- Further detail of items reviewed during this process can be found via the Business/Finance checklist added as an Appendix to this report.

Diego Hills Central: Personnel

Context

The preliminary review was a moderate risk because it was missing several oversight checklist documents. Once provided, Diego Hills Central met TB, DOJ, AB1433, anti-harassment and credential requirements for all certificated and classified staffing. The area superintendent appeared very compassionate regarding students' wellbeing and learning processes. She was also extremely organized and efficient with the charter daily processes and documents needed for oversight. It was clear that she has a close relationship with her certificated and support staff to meet academic standards for all students. The teacher interview brought out a genuine respect towards the Area Superintendent and the direction and motivation she gives them.

Concerns:

- P-11 Governing Board does not approve personnel actions.
- Area Superintendent was not on any staffing list provided. She updated her information and was added to the staffing lists to meet all Oversight requirements. She is being paid from an account under three different charters under the Learn4Life network, which consists of 10 charters.

Oversight Checklist Risk Assessment : Low

Recommendations

- None, concerns are Governance and Business in nature.

Diego Hills Central: Educational Program

Context

Diego Hills Central is an independent study charter school. Students who enroll at Diego Hills Central often have not experienced success in other schools and many are at risk of not graduating. Some have experienced school failure, while others have anxiety and other factors putting their chances of graduating at risk. The independent study format and small group instruction and tutoring offers a low-risk environment, free of bullying and other socially challenging situations. The trauma-informed staff is prepared to meet the needs of students who have faced challenges.

The curriculum is packet-based and largely delivered in person, in a center that is open all day, each school day. Teachers and tutors are available on campus at all times during school hours, and meet with students one-on-one or in small groups. Teachers accommodate for varying levels of ability in this setting.

There is a large group of English learners and students who have previously been redesignated. There is a strong focus on English mastery and academic ability for these students. Teachers use graphic organizers, SDAIE (specially designed academic instruction in English) strategies, and other tools designed to help students succeed.

In addition to work packets, students are expected to complete performance tasks in front of the teachers to demonstrate knowledge and ability. There are labs and other hands-on demonstrations, and end-of-unit tests are taken at the completion of packets to check for mastery and comprehension.

Data:

The school ranges in size, based on student need, but tends to educate 700-750 students. Of those, 173 students were tested in 2018-19. English language arts performance is 65.6 points below standard, having declined 5.9 points from the prior year. Also, 174 students tested in mathematics were tested in 2019, and mathematics performance is 149 points below standard, having declined 2.4 points from the prior year. No students opted out of the CAASPP test in 2019.

Of 171 students who would have been appropriate for graduation, 85.4% graduated. This is an 8.6% increase from the prior year.

703 students were enrolled as of CBEDs day 10/2/19. Only students in grades 3 - 8 and 11 are eligible to take the CAASPP. In the cases of Diego Hills Central, 227 students were eligible to CAASPP test based on their grade level. Of those 227 students, 173 tested.

Demographics:

About 63% of the 748 student population of Diego Hills Central is Latino, 14.3% is African American, and 12.8% is Caucasian. According to data received from and prepared by the school:

- 47% of the students are adults.
- The average age for Diego Hills students is 18.4.

- 32% of the student population was made up of English Learners. By comparison, in Dehesa and its charters, the total rate of English Learners is 4%.
- 83% of the students are socioeconomically disadvantaged.
- 10% are homeless.
- The largest grade level at Diego Hills Central is 11th Grade at 32%. 9th grade makes up 24% of the total population, 10th grade makes up 27%, and 12th grade consists of only 14% of the students.

Concerns

No major concerns.

Oversight Checklist Risk Assessment: LOW

Diego Hills Charter: Special Education

Context

When a charter school is its own independent LEA member of a SELPA for special education purposes, the charter school 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. A detailed guidance document from CDE dated 2017 will provide clarification for specific elements related to IDEA and charter schools (www.cde.ca.gov/sp/se/ac/spedinchartrsch.asp).

Diego Hills Central (DHC) is authorized by the Dehesa School District, but deemed a local education agency for purposes of special education with the El Dorado County Charter SELPA. Detailed responsibilities of the El Dorado SELPA and Diego Hills are outlined in the MOU dated July 2017.

Data

In addition to the evidence outlined in the oversight checklist, the following documents were added to inform the special education component of the study.

1. Memorandum of Understanding: Dehesa School District and Diego Hills Central (2012-2017)
2. Annual Performance Report (California Department of Education, Special Education Division) is reviewed. This report is required by Individuals with Disabilities Education Improvement Act of 2004 (IDEA) (20 U.S.C. 1416(b)(2)(C)(ii) and 34 CFR 300.602). All local education agencies including school districts, county offices of education and charter schools. There are 17 indicators that measure data relative to the complaint implementation of federal law in multiple areas such as statewide assessment, graduation rate, discipline, least restrictive environment, disproportionality, and IEP compliance. This document will serve as reference within the body of the report for each charter school for which Dehesa is reviewed and is available online at www.cde.ca.gov/sp/se/ds/leadatarpts.asp.
3. California School Dashboard
4. Special Education Student Information — SEIS is a web-based system that allows centralized, online access to the Individual Education Plan for all students, the management of that date, CALPADS reporting and service tracking. Its maintenance and operation are funded by El Dorado County Charter SELPA.

Curriculum/State Assessment

Diego Hills Central has a comprehensive plan to monitor and utilize data to drive curriculum and instructional decisions. They also use informal diagnostic assessments to track student growth. Student needs are met in small groups or 1-1 with qualified staff.

The Annual Performance Report 2018-19 reported that the school did not meet the state target of >95% par-

ticipation in English language arts and math on state testing. The percentage for participation in Diego Hills was English language arts (81.43%) and math (80.00%). This rating triggered a Performance Indicator Review (PIR).

The ELA Achievement test rate of 24.56% exceeded the state target of 14.9%, which demonstrates significant success. The math achievement rate of 8.93% did not meet the state target of 12.6%, which is a similar special education finding in many schools at this time. Diego Hills was identified for a Performance Indicator Review (PIR) in the participation rate for math and ELA.

This is a risk area which will be covered by the El Dorado County Charter SELPA.

Disproportionality

Diego Hills does not enroll a small number of students with disabilities disproportionately based on data used for 2018-19 from the California School Dashboard. The identification rate of 16.2% for Diego Hills was determined using the CALPADS enrollment (748) and Special Education Student Information System (SEIS) (121), while the identification rate for students with disabilities in Dehesa is 15.6%.

CALPADS data reflects that the EL and Socioeconomic Disadvantaged population in Diego Hills (EL 16.2% and Socioeconomic Disadvantaged 84%) are not reflective of the Dehesa School District (EL 10.9% and Socioeconomic Disadvantaged 56.2%). The enrollment process is open to all students regardless of EL Status, Socioeconomic Disadvantaged or students with disabilities. There are no recommendations to change the open enrollment process for enrollment in the charter school.

Policies and Procedures

The enrollment process for students with disabilities follows the same process as general education students; however, additional steps are added to comply with the requirements of IDEA.

Clear procedures and well-articulated practices are in place for the enrollment of students with disabilities on a 30-day interim basis. Upon enrollment all students are assigned a home room teacher who is the main link for the coordination of services in the school program. The philosophy of the school is to embrace all students with a cadre of teacher and program supports to ensure immediate success. A follow up IEP meeting occurs on a scheduled basis and includes all designated members of the IEP team. Policies are implemented to ensure compliance with IDEA special education timelines and verified through the unannounced review of all IEPs in SEIS during the course of this study.

Policies and procedures are in place for referral/assessment for both 504 and study teams. The school has a multidisciplinary student study team using a multi-tiered approach to interventions including Student Success Managers. General education teachers and parents are always key members of the team.

The school follows the administrative policy and procedural handbook for special education from the El Dorado County Charter SELPA. The staff is well trained, and systems are in place through the SELPA to training and support staff.

The last Memorandum of Understanding between the Dehesa School District was not available. The MOU with the El Dorado County Charter SELPA was dated July 2017.

IEP Timeline/Compliance

A review of the Annual Performance Report (2018-19) for Diego Hills indicates that they have achieved 100% compliance on both indicators for IEP compliance. The rate of timely IEPs such as the interim 30 day, annual

and triennial have met all the compliance statewide targets. According to records from the El Dorado County Charter SELPA, the school has some procedural or timeline issue and received a Data Identified Noncompliance (DINC) during the current year.

The reviewer did not find evidence that the Service Tracker was used in SEIS to document the provision of services as outlined in the IEP for each student, nor was there evidence of a service log. The district must have some mechanism for documenting that the services outlined in the IEP were actually provided. There is no requirement to use Service Tracker, but it is best practice to have some type of verification and accountability that services have actually been provided. Check with El Dorado on the best practice for documenting that services have been provided.

IEPs were reviewed in SEIS to confirm that all members of the IEP team were present at scheduled IEP meetings. The school's use of Zoom meeting formats provides a solid range of options for all parties to attend the meeting. Interviews with parents gave the school high marks for IEP meeting quality and consistency.

Staffing

Staffing is specialized with a one-on-one approach from a general education teacher in each class with support from credentialed special education teachers. All special education staff were verified through the Commission on Teacher Credentialing. Primary providers consist of program specialists, case managers, general and special education teachers.

All other related services of special education such as occupational therapy and speech therapy are provided through certified nonpublic agencies providers or school staff.

Suspension/Expulsion

The Annual Performance Report indicated the Discipline Rate is <2.76% in the district and meets the criteria established for discipline. There are no instances of suspension or expulsion of students with disabilities.

Student Records

Student records are stored in a confidential and secure location under staff direction. All IEPs are maintained within the SEIS system and available only with a confidential identification and password. All teachers have access to the records for students with disabilities through SEIS. General education teachers have "read only" access. Special education teachers, program specialists and administrators have full access to special education files.

Oversight Checklist Risk Assessment: Low

Diego Hills Central: Facilities/Operations

Context

Diego Hills Central (DHC) is part of a CMO restructuring. It is part of the Learn4Life network of schools and operated by the nonprofit Diego Plus Education Corporation, which is served by the nonprofit Lifelong Learning Administration Corp. Although the nonprofits heading up DHC aren't fully transparent, it should be noted that from its CEO and below, there was a strong effort for transparency in support of this DHC facilities/operations oversight process.

In addition to the governance restructuring, last fall DHC was in the process of moving into a remodeled gro-

cery store on 54th Street in central San Diego. Initially some required oversight documents had not been received by DHC, but were sent as they were received.

Oversight Checklist Risk Assessment: Low

Concerns

- Checklist item for Meeting Ed Code location requirements is being adjudicated.



May 29, 2020

Mr. Bradley Johnson
Superintendent
Dehesa School District
4612 Dehesa Road
El Cajon, CA 92019

Re: Annual Charter Oversight Process – Response to Draft Report of Findings/Recommendations

Dear Mr. Johnson:

Thank you for your May 22, 2020 correspondence enclosing the Draft Report of Findings/Recommendations (the “Report”). Diego Hills Central (“DHC”) appreciates the thoroughness of the Report and is gratified by the findings as they relate to DHC’s educational program and, generally, with respect to other aspects of DHC’s operations. DHC does recognize that there are concerns expressed in the Report and DHC also appreciates the opportunity to address those concerns here.

As a preliminary matter, DHC offers the following clarifications with respect to several references in the Report. First, Learn4Life (sometimes also referred to in the Report as “L4L”), is not an entity. Learn4Life is a brand that refers generally to a network of 20 charter schools (not 10 schools, as was noted multiple times in the Report) all employing the Learn4Life personalized educational model. Similarly, therefore, Lifelong Learning Administration Corporation (“LLAC”), a service provider to Diego Hills Central (“DHC”), is not Learn4Life. Second, in some instances, the Report refers to DHC as simply Diego Hills. It is important to refer to DHC by this acronym in its entirety or to otherwise include “Central” when using the name of the charter school to avoid confusion with a previously existing charter, Diego Hills Public Charter School. Third, the Report refers to DHC being “part of a CMO restructuring”. The accurate statement is DHC is an independent charter school, governed by its own independent board of directors.

Governance

Charter Material Revision. DHC acknowledges that that the material revision did not adequately describe the school’s statutory member corporate structure. This was not the product of an intent to be anything less than transparent. The sole member structure has been so frequently used by charter schools and, particularly charter school networks, over the last 20 years, that DHC inadvertently underestimated the need to more expressly describe the structure. As noted in DHC’s bylaws and 3rd party audited financial statements, the sole member serves an extremely limited role. Its purpose is to ensure that the multiple charter schools in the

Learn4Life network operate in accordance with the Learn4Life mission and that the commitment to providing a quality education is consistent across the network. DHC is now mindful of Dehesa's concerns regarding the sole member structure and DHC is, therefore, in the process of considering alternative means of satisfying these goals.

With respect to the use of a non-profit educational and administrative services provider, it has always been DHC's belief that Dehesa has at all times been aware of Lifelong Learning Administration Corporation ("LLAC") and its role as a service provider to DHC. LLAC representatives regularly attend DHC board meetings to, among other things, support DHC staff reporting to the board.

DHC will strive to ensure continuing clarity with respect to Dehesa's knowledge and understanding of DHC's corporate structure and service-provider relationships.

Election of Additional Board Member. The Report correctly points out that it is the responsibility of the sole member to appoint DHC board members. However, it remains important that the DHC board have an opportunity to raise any concerns regarding board members being appointed. Use of the word "appointment" in the minutes referenced in the Report was simply an inadvertent use of the incorrect word. In fact, the board was given the opportunity to "acknowledge" the appointment. DHC appreciates the reminder of the importance of ensuring that, as much as possible, meeting minutes are fully accurate.

Activity Level of Board Members. Encouraging and fostering meaningful involvement of board members during meetings is a perennial challenge. All boards are different. The collective and individual personalities vary. Some tend to be very vocal, while others are less expressive. Moreover, some agendas are naturally more substantive, drawing greater board member participation and discussion. It is also important to note that prior to board meetings, board members are provided substantial detailed information and reporting regarding agenda items. These materials seek to anticipate and address board members questions. This thoroughness often has the effect of resolving board members questions prior to the meetings. DHC is very focused on encouraging its board members to be inquisitive and opinionated, including by way of the board president actively encouraging discussion as well as by including on board agendas substantive presentations that have a greater tendency to illicit board questions, comments or concerns. DHC welcomes the continuing input of Dehesa with respect to this effort.

Board Member Recruitment and Composition. With respect to officer positions, there is a distinction between officers of the board and officers of the corporation. Historically, having common officerships (CEO and CFO) among the schools in the network has proven to be extremely beneficial. The greatest benefit is, not surprisingly, efficiency and economies of scale. To date neither DHC nor the other schools in the Learn4Life network have encountered any conflicts, transactional or otherwise, that would give rise to divided loyalties. No individuals occupying common officer positions among the schools work for or owe any fiduciary obligations to the sole member (EAC) or to LLAC. The board of DHC has never faced a situation in which it was required to make any decisions or set any policies that conflict with the interests of other schools. Thus, the fulfillment of their fiduciary duties to DHC has never been

undermined, nor has the board faced any circumstances under which the fulfillment of its fiduciary duties to DHC could have been undermined.

Recruiting enough board members to continuously ensure a professionally, culturally and experientially diverse board has always been a challenge faced by charter schools. Over the years, DHC has employed various strategies to generate public interest in board service with a particular eye on encouraging community involvement. As part of the efforts to meet this challenge, as many as 5 potential new board members have been identified. Prior to the COVID-19 shutdowns, the prospective board members began attending DHC board meetings in order to become familiar with the school, the role of the board, etc. DHC is hopeful of having at least 2 new board members join the board by September 2020 who will bring a wealth of experience related to education, board service and workforce readiness. DHC welcomes any suggestions Dehesa may have with respect to maintaining a diverse and community-based board.

Community Engagement. DHC encourages parent and community engagement in school governance. Board agendas are publicly posted per the Brown Act at least 72 hours prior to board meetings, in addition to being posted on the school’s website. All board meetings are open to the community for participation via teleconference or in-person. The teleconferencing option has been made available since before the COVID-19 pandemic. Additional details about DHC’s efforts to encourage community involvement is detailed under DHC’s response to Checklist Item G6, below. Additionally, DHC is committed to notifying parents of upcoming board meetings through a variety of platforms similar to our process for PAC/ELAC meetings, including flyers sent home, flyers posted in the school-site lobby, L4LConnect notifications, and emails. Attendees are involved in the discussions at PAC/ELAC meetings and are asked for their input about programs, activities, and events being planned and how they can be improved with these recommendations being reported to the board at future board meetings.

Board Stipend. DHC board members are not paid compensation. They are provided stipends associated with expenses related to service. This is not uncommon in connection with non-profit board service and helps to address the challenges in generating interest in board service. The Report correctly points out that it has been some time since the board has reviewed the stipend amount and, accordingly, the issue will be agendaized for review and action at an upcoming board meeting.

Effective Governance. Respectfully, DHC disagrees with the Report’s finding that the corporate structure reduces the effectiveness of the governing board. Nonetheless, DHC agrees that effective governance is critical. Accordingly, based upon this finding, DHC has retrospectively examined its governance in recent years and has been unable to identify any instances or examples of reduced governance effectiveness. The Report specifically references a heavy reliance on management, lack of transparency into the operations of the administrative services provider and sole statutory member selection of board members as reducing the effectiveness of the governing board. With regard to a “heavy reliance on management”, DHC is unable to discern what is meant by this statement and would appreciate additional information in order to formulate its response. With regard to a lack of transparency into the operations of the administrative services provider, the DHC board receives regular reporting from LLAC regarding the services provided. The board also receives information from school staff regarding

the quality of the services provided. Ultimately, the DHC board holds the exclusive discretion as to whether or not to contract with LLAC. With respect to the sole statutory member's right to appoint board members, again DHC has been unable to identify any examples of the appointment power being exercised in a manner that reduced the effectiveness of the board. However, as discussed above, DHC acknowledges Dehesa's concerns regarding the sole statutory member and, as also stated above, DHC is in the process of reviewing potential changes to its structure in order to address Dehesa's concerns while preserving what DHC views as the benefits of the current structure.

The Report also states that operational and governance transparency are compromised and that the board capacity to hold management accountable for outcomes is limited. DHC would appreciate the opportunity to better understand this finding. As to accountability, all operational decisions are made by DHC. The board of DHC has adopted the Charter School Accounting Manual and has directed LLAC to follow the applicable recommendations set forth therein as revised and updated from time to time. To the extent that DHC finds the services provided by LLAC to be in any way deficient, it has a variety of rights under its agreement with LLAC to address any such deficiencies and, of course, always has the right to discontinue the services.

Any concerns of Dehesa regarding the effectiveness of DHC's board are of great importance to DHC. DHC would welcome the opportunity for a more fulsome conversation to better understand this portion of the Report so that appropriate steps can be taken to resolve any concerns.

Recommendations. The board will update its bylaws at the August 20, 2020 board meeting. DHC is agreeable to submitting a revised petition.

Finance/Business

Operational Independence. All educational and operational decisions are made by DHC and not LLAC. While LLAC may provide recommendations, DHC has the sole discretion as to whether to accept any such recommendations. DHC respectfully disagrees with the statement that its services agreement with LLAC is general in nature. The agreements contain detailed lists of all of the services provided. Section 4 of the Administrative Services Agreement sets forth 10 categories of services including, express references to at least 30 separate services. Section 4 of the Educational Services Agreement identifies 13 categories of services, including express references to at least 35 separate services. A review of other publicly available management and services agreements entered into by California charter schools and around the country shows that the DHC – LLAC agreement is as detailed or more detailed than the other agreements reviewed. LLAC is in the process of developing new comprehensive annual reporting to the DHC board with respect to all services being provided which will assist the DHC board in evaluating the scope and benefits of the services provided. DHC looks forward to furnishing copies of these reports to Dehesa to assist Dehesa in its oversight role.

DHC is unable to address the Report's discussion concerning the fee paid to LLAC as there is no explanation as to how the 15% fee relates to the finding that DHC may be unable to

operate independently from LLAC. It is extremely common for charter schools to pay for administrative (i.e., back-office) and educational services on a percentage of revenue basis. It is uncommon for schools to pay for such services on an individual cost-reimbursement basis. It has been DHC's experience that, because of the extremely broad and comprehensive array of services provided by LLAC, it is more beneficial to pay a percentage fee as opposed to a fee based on a multitude of separate cost reimbursements. A study of fees paid by charter schools to management companies and similar service providers shows that the fees paid by DHC to LLAC are consistent with the market as to both the fee percentage and the scope of services provided. Indeed, in several instances, the scope of services provided by LLAC materially exceeds the scope of services provided by other service-providers to other schools paying fees comparable to what DHC pays LLAC.

DHC agrees that operational independence is extremely important. However, DHC also recognizes the substantial benefits received by DHC through its contractual relationship with LLAC. The efficiencies associated with centralized service delivery is one meaningful example since freedom from day to day administrative tasks allows DHC to focus primarily on its core mission – educating at-risk students. Historically, there has been no indication that DHC hiring staff to perform the services provided by LLAC would result in greater economic efficiency. In fact, the opposite has been found. Moreover, DHC benefits substantially from participating in group, or “bulk”, purchasing of supplies and third-party services, such as insurance.

Compensation Data from LLAC IRS 2017 990 Filing. Dante Simi, former CEO of LLAC, never served as Sr. Director of Facilities. The Sr. Director of Facilities is the son of Dante Simi, having the same name. Neither Dante Simi nor Linda Simi, both of whom were founders of the Learn4Life network of charter schools decades ago, work for LLAC. Both left the company more than 2 years ago. The compensation amounts reflected in LLAC's 2017 990 IRS filing include payments made in settlement of legal claims made by Dante and Linda Simi in connection with their departure from the company. DHC lacks additional information as these are confidential employment matters of LLAC that DHC is informed are subject to settlement agreements between the Simis and LLAC containing confidentiality provisions. DHC is informed by LLAC that the board of LLAC elected to resolve the claims, including by way of paying compensation, rather than incurring the substantially greater costs and distractions associated with protracted litigation and that the LLAC board was assisted in the process by an independent nonprofit executive compensation consultant.

Recommendations: DHC agrees that, as matter of course, its board should regularly review the scope and effectiveness of the services provided by LLAC. At this time, DHC is unaware of any redundancy of services nor is it aware of any services that should be deleted for any particular reason. Historically, review and consideration of this issue have resulted in the conclusion that no such benefits would be achieved. Nonetheless, in response to the Report, DHC intends to undertake a comprehensive review in order to consider whether eliminating services and hiring staff directly to work for DHC would result in any operational or financial benefits to DHC. Additionally, a thorough and comparative study of the pricing and scope of services provided by charter management companies in California is being prepared and will be presented to the DHC board for review.

Personnel

DHC addresses the statement regarding missing documentation in the responses to checklist items below. All requested documents were available for review at the school site, in part, due to privacy concerns but also because it was DHC's understanding that the documents were to be reviewed during the oversight visit to the school site.

Facilities

All DHC facilities are located in accordance with geographic provisions of the Education Code applicable to DHC. This is currently the subject of ongoing litigation (presently pending before the California Court of Appeals) about which Dehesa is kept regularly informed. DHC would be pleased to submit a more comprehensive report regarding the litigation under separate cover, if requested.

Response to Checklist Items

Binder 3, Tab 1. (Snapshots of Minutes).

There is no legal requirement for posting snapshots of minutes on the school's website.

No. G1. (Corporate Documents of LLAC and EAC).

DHC is unaware of any request that these documents be provided.

No. G2. (Bylaws)

The board will update its bylaws at the August 20, 2020 board meeting.

No. G3. (Minutes re Updated Bylaws)

No such minutes exist as bylaws have not been updated since 2011. The board will update its bylaws at the August 20, 2020 board meeting.

No. G4. (Meeting Do Not reflect Complex Corporate Structure)

DHC is unclear as to the meaning of this comment. That said, all operational decisions are made by DHC, in some cases, based upon recommendations from LLAC. Based upon recommendations contained in the Report, DHC is reviewing board meeting best practices to ensure independent decision making by the DHC board is reflected in board actions and minutes related thereto.

No. G5. (Board Review of Key Positions.)

DHC will implement more robust evaluation of key employees by the board recognizing, however, that the board properly relies upon input of the Area Superintendent who has

direct knowledge of the performance of other key employees.

No. G6. (Community Involvement/EAC Board Member Selection.)

DHC addresses the compelling needs of its students with the support and collaboration of parent and community stakeholders. All communication efforts encourage parents and community members to become involved with the school.

A Parent Advisory Committee (PAC) and English Language Advisory Committee (ELAC) exists to provide a forum for parent and community member input and to inform all parents and community members of the progress being made by the school. While it is accurate that DHC currently conducts the PAC and ELAC together, this is permitted by applicable sections of the Education Code when there is an equal representation of English Only and EL parents. With that being said, DHC recognizes that, going forward, it would be a best practice to separate these meetings and will make an effort to do so in the future. Records from the most recent PAC/ELAC meeting held in February 2020 and sent to Gail Greely on April 14, 2020 reflect 8 parents in attendance. The meetings vary from 5 to 20 participants each meeting. Various factors including the school's high transient population, the average age of enrollment, and overall student demographics can pose significant challenges from year to year to maintaining parent participation. The PAC/ELAC structure includes the following:

- Members (all stakeholders) are recruited during student/parent orientation, open house, back to school night, parent information meetings, school newsletter, and parent-teacher meetings.
- Parents are given a PAC survey to determine what topics parents want covered, what days and times parents can meet, and what are parents' concerns and needs.
- Members determine what issues and concerns will be addressed such as curriculum improvements, student support services, fundraising activities and support workshops.
- Parents are notified of upcoming PAC/ELAC meetings through a variety of platforms, including flyers home, flyers posted in the lobby, L4LConnect notifications, and emails.

Through the PAC/ELAC, the teaching and administrative staff inform parents and community members of the implementation of programs at the school and encourage active participation in the school. Attendees become informed of the departments within the school and how they perform their functions. Attendees receive training and information regarding subjects such as the LCAP, LCFF, and the Common Core curriculum. Attendees are involved in the discussions at these meetings and are asked for their input about programs, activities, and events being planned and how they can be improved.

Additional Opportunities for Parent/Community Involvement

DHC has always maintained an open-door policy whereby parents and community members are encouraged to visit the school during all open hours. Normally a staff member is assigned to the visitor who accompanies the visitor on a tour of the learning center and points out the different projects taking place throughout the school. Teachers contact parents regularly to share how their child is progressing. This contact is required from all supervising teachers by the Principal and encourages a continuous, open and friendly relationship between the parents and the school. These two activities alone provide a friendly atmosphere where the environment is conducive to parent and community involvement.

Additional activities promoting communication between the school, parents, and the community include: open houses, back to school nights scheduled close to the beginning of the school year for parents and family members to visit with their child's teachers and school staff, award ceremonies, graduations, and field trips.

Teacher/Staff Engagement & Input

All staff members are made aware of board meeting dates and times and are encouraged to attend board meetings, although this attendance may not always be apparent since, pursuant to the Brown Act, parents need not identify themselves. Also, all principals attend every board meeting and present a report to the board with updates regarding learning goals, state testing performance, enrollment trends and extracurricular activities.

As mentioned above, the DHC administration team believes in an open-door policy. Teachers and other staff members are encouraged to provide feedback at weekly staff meetings, one-on-one with their school leader and/or with the area superintendent, or via email as needed. The administration team at DHC is eager for feedback and welcomes staff and teacher input.

Through community contacts of EAC board members and input from other DHC stakeholders, potential board members are identified and, when appropriate, considered for appointment.

No. G8. (Composition of Governing Board.)

Please see discussion in narrative Response to Report Findings/Recommendations.

No. G9. (Governing Board Reflection of Community, Diversity, etc.)

Please see discussion in narrative Response to Report Findings/Recommendations.

No. G10. (Governing Board Member Experience.)

Please see discussion in narrative Response to Report Findings/Recommendations.

No. G11. (Governing Board.)

All board members adopt and adhere to conflict of interest policy and applicable law. There are no conflicts between schools, transaction or operational. Thus, common positions are not incompatible.

No. G12. (Frequency of Board Meetings.)

Governing board meets 6 times per year, plus special meetings as needed.

No. G13. (Board Member Brown Act Training.)

Board members received Brown Act training for the 2019-2020 school year on November 18 and 19, 2019.

No. G14. (Adequacy of Agenda Descriptions.)

Agendas are reviewed by legal counsel for adequacy of descriptions. In response to Report, DHC will review practices in this regard to ensure adequate descriptions for all agenda items.

No. G16. (Posting of Minutes on Website.)

There is no legal requirement for posting minutes on the school's website nor is DHC aware of such a requirement from Dehesa. The header on DHC's website referring to minutes was removed to avoid confusion. Minutes of board meetings are always available upon request.

No. G19. (Conflict of Interest Policies.)

The board will update its bylaws at the August 20, 2020 board meeting.

No. G38. (Increase in Enrollment Reflects Possible New Procedures.)

The comment is incorrect. DHC requests that the oversight team revisit this item as it may be a comment applicable to another, unrelated, school. The chart below summarizes DHC for ADA YTD by school year since opening, which demonstrates a 25% increase in year two, and a 40% enrollment decline in year three. The decrease in enrollment is primarily attributable to DHC relinquishing its Riverside school site as part of material revision approved by Dehesa in November 2019 as part of DHC's efforts to reduce the geographic scope of Dehesa's oversight responsibility.

School Year	ADA YTD	% Increase from Prior Year
2017-18	617.54	--
2018-19	770.89	25%
2019-20	460.91	-40%

No. F2. (Availability of Documents from prior Board Meetings.)

DHC is reviewing mechanisms for making documents more readily available.

No. F5. (Budget Provides for Financial Obligations.)

Regarding loan from LLAC, it should be noted that school is funded in arears. Thus, borrowing is sometimes necessary to meet current obligations. Charter schools have limited alternatives for financing. Typically, schools find themselves having to sell receivables, paying extremely high costs and interest, because typical institutional lenders (e.g., banks) do not lend to charter schools. On balance, borrowing from LLAC is substantially more favorable and, as a result of DHC’s rights under its services agreement with LLAC, the loan affords LLAC no influence over DHC which is free to acquire services from another provider.

Regarding LLAC executive compensation, please see discussion in narrative Response to Report Findings/Recommendations.

No. F31. (School’s Independence from LLAC.)

Please see discussion in narrative Response to Report Findings/Recommendations.

No. F32. (Salary Schedule.)

Officer and key employee salaries are reviewed and reported on by outside law firm. Written reports are maintained with board minutes.

No. P4. (Employee DOJ Background Check.)

Documentation regarding compliance as to all employees was available at school site and DHC anticipated providing same during site visit. DHC refrained from transmitting electronically due to privacy concerns.)

No. P5. (Employee TB Compliance.)

Documentation regarding compliance as to all employees was available at school site and DHC anticipated providing same during site visit. DHC refrained from transmitting electronically due to privacy concerns.)

No. P7. (Employee Training.)

DHC provided confirmation of supervisor training on November 5, 2019, as requested. During the oversight visit, DHC was asked to provide information regarding training of non-supervisory employees and, in response, promptly provided confirmation of sexual harassment and school bullying training.

No. P11. (Board Approval of Personnel Decisions.)

There were no personnel decisions requiring board approval at the meetings reviewed.

No. P15. (CLAD/BCLAD Certification.)

Checklist provided to school was unclear. DHC provided an organizational chart based upon positions not employee names which DHC understood to be sufficient.

No. P16. (SPED/Related Services Credentials.)

Checklist provided to school was unclear. DHC provided an organizational chart based upon positions not employee names which DHC understood to be sufficient.

No. E20. (Testing.)

DHC has been identified for Targeted Review by the CDE in the areas of statewide assessment participation in ELA and Math. DHC received a NO COLOR rating for statewide assessment academic performance and was not selected for targeted review in those areas. DHC has filed the required Assurances Form with the CDE and will complete the Performance Plan responses following the guidelines established by the CDE and monitored by the El Dorado SELPA.

Conclusion

DHC's students come to school with a variety of uniquely challenging needs, including homelessness, pregnancy/parenting, a need to work, anxiety/depression, bullying and the need for credit recovery. Meeting these challenges is most effectively accomplished through professional collaboration and resource sharing. With this in mind, DHC benefits greatly from being part of the Learn4Life network of schools. LLAC as a service provider to those schools facilitates this process and assists each school in realizing the benefits of inter-school professional collaboration and development of best practices.

In much same way that DHC encourages its students to be always learning and improving, DHC seeks to do the same and the instructive results of the Report will no doubt help DHC to improve its operational practices to ensure that nothing impedes fulfillment of the school's mission to successfully educate at-risk students. DHC is committed to being thoroughly transparent and responsive to any concerns that Dehesa may have. To this end, DHC looks

forward to an ongoing dialogue with Dehesa about the issues raised in the Report or any other matters of concern for Dehesa. DHC looks forward to continuing its long and mutually beneficial relationship with Dehesa.

Should you require any additional information, please do not hesitate to contact me.

Sincerely,

Lindsay Reese

Lindsay Reese
Area Superintendent
619.633.9939
lreese@innovationhigh.org

cc: Kevin Ogden, Charter Liaison, Diego Hills Central Charter School

Diego Hills Central

Diego Hills Central: Governance

BINDER 3: GOVERNANCE DOCUMENTATION DIEGO HILLS CENTRAL			
Tab	Description	Compliance Area(s)	Provided?
1.	Articles of Incorporation	G1	Y
2.	Bylaws	G1-G4, G6, G12	Y
3.	Approved Charter	G3, G6, G8, G12	Y
4.	Most Recent School Leader Evaluation	G5	Y
5.	List of Board Members	G7-G8	Y
6.	Board Member Biographies	G9-G11	Y (board pres in follow-up)
7.	Description of School and Community Demographics	G9	Y
8.	Completed Form 700s for Board Members and Leadership	G11	Y
9.	Annual Board Meeting Calendar	G12	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Tab	Description	Compliance Area(s)	Provided?
10.	Sign-in Sheet(s) from Brown Act Training	G13	Y (summit)
11.	Three Most Recent Board Meeting Agendas	G14-G15	Y
12.	Screenshot of Website with Posted Agenda	G14	Y
13.	Public Comment Description/Policy	G15	Y
14.	Three Most Recent Board Meeting Minutes	G16	Y
15.	Screenshot of Website with Posted Minutes	G16	N (not posted)
16.	Board Meeting Minutes Reflecting Review of Compliance with Education Code Section 49431.9 (Prohibiting Food/Beverage Advertisements)	G17	N
17.	Parent Handbook	G18	Y
18.	Student Handbook	G18	Y
19.	Employee Handbook	G18	Y
20.	Complete Set of Board Policies	G19-G30, G39	Y
21.	Memorandum of Understanding	G38	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:
 Gail Greely
 Position of Assigned Staff Person:
 SSDA DCOT

DIEGO HILLS CENTRAL GOVERNANCE OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Organizational Management</u>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<input type="checkbox"/> Articles of Incorporation (Binder 3, Tab 1) <input type="checkbox"/> Bylaws (Binder 3, Tab 2)	X		Did not include corporate documents for LLAC or sole statutory member, EAC
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	Bylaws provided (effective date 9/6/2011 - no amendments) are not consistent with current legal requirements for charter school transparency and conflict of interest. Also, actions of the board in electing a new director are not consistent with bylaws provided.
G3	Any changes to charter or bylaws have been approved by charter school's governing board and submitted to the authorizer.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)	X		Don't have board minutes reflecting any changes to bylaws, bylaws provided were confirmed to be most recent (2011)

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G4	There is a clear distinction between responsibilities of governing board and administration.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	Meetings do not reflect complex corporate structure, nor sharing highest levels of leadership among many L4L schools; many administrative functions are handled by LLAC with the board appearing to defer; major items such as tax return, selection of auditor, authorization for staff bonuses and reallocating special education funds handled on consent agenda; board approves some personnel actions (sup't and CEO selection) but no evidence of any others.
G5	Governing board has a robust process for evaluating the charter school leader.	<input type="checkbox"/> Most recent charter school leader evaluation (Binder 3, Tab 4)		X	Charter says Principal reports to the board, but evaluation of principal was done by regional superintendent, not board; not clear which positions, if any, the board evaluates – undermines accountability
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3) <input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q2) <input type="checkbox"/> Teacher interview (Binder 1, Tab 4, Q1)	X		Board employs no nominating committee or outreach to selection members; nothing in bylaws or charter provides role for parents or staff in governance. School combines PAC and ELAC – limited participation. No information on process of the sole statutory member (EAC) for selection of board members.
Composition					
G7	Charter school has a list or roster of governing board members.	<input type="checkbox"/> List of board members (Binder 3, Tab 5)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G8	Composition of governing board is consistent with approved charter.	<input type="checkbox"/> List of board members (Binder 3, Tab 5) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)		X	Charter silent on size, selection or composition of the board – misleading by omission about corporate structure; bylaws include sole statutory member who selects board members; but minutes of 2/28/2019 include election of a new member and 6/10/19 has all 3 of the other members elected for one year terms; also, corporate sec and CFO/treas are not board members, shared in common with other related corporations
G9	Governing board is diverse and reflects charter school and community population.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Description of school and community demographics (Binder 3, Tab 7)		X	Board membership is ¾ white; newest member Hispanic; school is 18% black, 48% Hispanic and only 9% white per documents provided; in addition, 3 serving members were reappointed with no process to solicit diverse representation
G10	Governing board members have experience in key areas, such as education, finance, legal, real estate, and fundraising.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6)	X		Staggered terms; mixed backgrounds, skills and knowledge; some education experience and fundraising; limited school finance, legal, real estate

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Completed Form 700s (Binder 3, Tab 8)		X	Board members to be appointed by EAC and serve 2 different schools; concerns about incompatible offices; also, (per Form 990) board members have received compensation; bylaws allow reasonable stipend; Aug 2017 minutes approve stipend of \$450 per meeting –higher than legally allowable stipend for elected board members
Meetings					
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.	<input type="checkbox"/> Annual governing board meeting calendar (Binder 3, Tab 9) <input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)	X		Charter says nothing about meeting frequency; bylaws call only for annual meeting; board has 5 regular meetings per year which seems inconsistent with level of recent activity (including new location and rapid enrollment growth); large gap between Feb and June 2019
G13	Governing board members receive annual training regarding Brown Act requirements.	<input type="checkbox"/> Sign-in sheet from Brown Act training (Binder 3, Tab 10)		X	Information provided was from Sept 2018 – can't confirm annual
G14	Meetings are noticed in accordance with the Brown Act.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 12)	X		Descriptions of items are limited – may not adequately inform the public
G15	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Public comment policy (Binder 3, Tab 13)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G16	Minutes are approved and thereafter made available to the public.	<input type="checkbox"/> Sample meeting minutes (Binder 3, Tab 14) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 15)		X	Minutes are prepared and approved at a subsequent board meeting, but are not posted on the website, although a link exists to do so; minutes do not always show time of adjournment (either for closed session or meeting); they do not include much comment or questioning by the members
G17	Governing board annually reviews charter school's compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	<input type="checkbox"/> Board meeting minutes (Binder 3, Tab 16)			School does not participate in school lunch program – says requirement not applicable.
Board Policies					
G18	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<input type="checkbox"/> Parent handbook (Binder 3, Tab 17) <input type="checkbox"/> Student handbook (Binder 3, Tab 18) <input type="checkbox"/> Employee handbook (Binder 3, Tab 19)	X		
G19	Governing board has adopted policies related to conflict of interest.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		Updated conflicts policy adopted 6/10/2019 and 8/22/2019 (per minutes); Dec 2019 version submitted to county; provisions on conflicts in bylaws are inconsistent with these updated policies and current law
G20	Governing board has adopted policies related to student discipline and due process.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G21	Governing board has adopted policies related to complaints and investigations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G22	Governing board has adopted internal control policies (and related forms and systems).	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G23	Governing board has adopted policies related to bank signature authorizations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		Board approves changes in bank signatures – reflected in minutes
G24	Governing board has adopted policies related to allowable purchases and purchasing authority.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G25	Governing board has adopted policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G26	Governing board has adopted policies related to employee harassment.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G27	Governing board has adopted and annually updates its safety plan to include all legal requirements applicable to charter schools.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G28	Governing board has adopted policies related to immunization records.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G29	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G30	Governing board has adopted policies related to Section 504/IDEA compliance.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Education Code Assurances					
G31	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q3)			
G32	Charter school has complied with assurance that it shall not charge tuition.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q4)			
G33	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q5)			
G34	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).	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q6)			
G35	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q7)			

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G36	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q8)			
G37	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	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q9)			
Memorandum of Understanding					
G38	Charter school has complied with terms of current memorandum of understanding, if applicable.	<input type="checkbox"/> Memorandum of understanding (Binder 3, Tab 21)	X		Ten-fold increase in enrollment raises question of whether admission requirements and procedures were changed without prior approval contrary to MOU; otherwise unable to determine based on documents provided -need more information from Dehesa

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Complaint Policies & Procedures					
G39	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom.	<input type="checkbox"/> Board policies (Binder 3, Tab 20) <input type="checkbox"/> Observation of classrooms (Binder 1, Tab 10, Q5)			
G40	Complaint policies and procedures are available in the main/front office.	<input type="checkbox"/> Observation of main office (Binder 1, Tab 11, Q1)	X		
			Total "No" Responses: 8		
			Risk Assessment: 0-10 Low 11-20 Moderate 21+ High		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Diego Hills Central: Finance and Business

Assigned District Staff Person: Tom Krzmarzick

Position of Assigned Staff Person: Finance and Business Lead

DIEGO HILLS CENTRAL FINANCE/BUSINESS OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Budget, Accounting, and Financial Reporting</u>					
F1	Governing board policies address budget, accounting, and financial reporting.	<input type="checkbox"/> Board policies (Binder 6, Tab 1)	✓	<input type="checkbox"/>	Board adopted its policies based on the California Charter School Accounting Manual and Best Practices Manual of the Fiscal Crisis and Management Assistance Team (FCMAT), 2017. Policies approved by Board on August 22, 2019. Additional revisions to be implemented over the next year to customize policies to specific school processes.
F2	Current budget has been approved by the governing board.	<input type="checkbox"/> Current/adopted budget (Binder 6, Tab 2) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 3)	✓	<input type="checkbox"/>	SACS form reporting provided to board for current budget as well as budget adoption. Evidence demonstrated board approval. It is noted however, that only minimal prior Board Meetings are available on school website. Individuals interested in documents from prior year or prior meeting earlier in the year must request the documents via email.
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	<input type="checkbox"/> Board meeting minutes (Binder 6, Tab 4) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q3)	✓	<input type="checkbox"/>	Per the Board Meeting Minutes, Agendas, presentations of fiscal reports presented, there is sufficient evidence the school has

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	approval.				a clear process for reviewing the budget and related updates throughout the year. Specifically, for FY 2019-20 the school experienced a drop of 200 ADA due to its relocation of its school to a new location. The budget revisions and future year projections captured these significant changes well.
F4	Budget aligns with charter school's current LCAP or update to LCAP.	<input type="checkbox"/> Current budget (Binder 6, Tab 2) <input type="checkbox"/> LCAP/LCAP update (Binder 6, Tab 4)	✓	<input type="checkbox"/>	LCAP Report Included in Binder 6 (Business & Finance). Aligned with school budget
F5	Budget provides for all financial obligations.	<input type="checkbox"/> Current budget (Binder 6, Tab 2)	✓	✓	Financial records/reports demonstrate budget provides for all financial obligations. Separate budget/fiscal narrative presented to Board by LLAC reps during each required state fiscal reporting period. Concern noted regarding a \$4M loan the school obtained from LLAC for FY 2019-20. Raises concern about relationship with LLAC. An additional concern regarding relationship with LLAC is significant compensation given LLAC CEO in prior year per 2017 Form 990 of approx. \$829,000, & spouse of CEO with compensation of approx. \$333,000.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F6	Governing board approves all required financial reports.	<input type="checkbox"/> Required financial reports (Binder 6, Tab 5) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 6)	√	<input type="checkbox"/>	School Board Meeting Agendas & Minutes demonstrate approval of all required financial reports (Budget, 1st/2nd Interim, UAs)
F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 7)	√	<input type="checkbox"/>	Submission of adopted budget submitted and included in Binder 6 (Business/Finance) data, and during interview/meeting with CFO and Business Back Office support staff
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 8)	√	<input type="checkbox"/>	Submission of 1st Interim Report included in documents (Book 6) reviewed during interviews
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 9)	√	<input type="checkbox"/>	Submission of 2nd Interim Report included in documents (Book 6) reviewed during interviews
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 10)	√	<input type="checkbox"/>	Unaudited actuals included in data provided during interviews/meetings. Board approved
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	Every fiscal report or budget included separate accounts for restricted revenues & expenditures
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	At each required reporting period (Budget, 1st/2nd Interim) cash flow reports are included in fiscal projections presented to school board for review

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F13	Charter school's business accounting system complies with state accounting and reporting requirements.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q4)	√	<input type="checkbox"/>	School's accounting system complies with state accounting and reporting requirements. Reports of school's financials represented via SACS alternate form
<u>Audit</u>					
F14	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.	<input type="checkbox"/> Proof of submission of auditor certification and contract (Binder 6, Tab 11) <input type="checkbox"/> Director of finance (or equivalent) interview ((Binder 1, Tab 2, Q5)	√	<input type="checkbox"/>	Wilkinson, Hadley, King - State approved auditors utilized by the school. Submission requirements to authorizer and SDCOE met
F15	Charter school has developed auditing schedule/timeline.	<input type="checkbox"/> Auditing schedule/timeline (Binder 6, Tab 12)	√	<input type="checkbox"/>	Brief timeline presented during interview, meetings.
F16	Charter school has submitted prior year's financial audit to authorizer.	<input type="checkbox"/> Previous year's audit (Binder 6, Tab 13) <input type="checkbox"/> Proof of submission (Binder 6, Tab 14)	√	<input type="checkbox"/>	Audit results provided during interview/meetings. Evidence of submittal to Authorizer
F17	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	<input type="checkbox"/> Corrective plan of action (Binder 6, Tab 15) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q6)	√	<input type="checkbox"/>	No deficiencies noted. N/A

Financial Condition

F18	Charter school maintains an appropriate level of reserves for economic uncertainties.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q7)	√	<input type="checkbox"/>	School projecting an Ending Balance of \$249,533, or 2.8%, on a Revenue Base of \$8.9 in FY19-20Ending Balance projected to increase gradual in two future
-----	---	--	---	--------------------------	--

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F19	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q8)	✓	<input type="checkbox"/>	years Every required fiscal reporting period the school prepares and presents to the Board a Multi-Year projection that includes the current year and two future years Yes. As mentioned above in section 18, there is sufficient level of reserves for the school for the current year and also in the 2 future year projections. Projections include recent significant drop in ADA (200) due to relocation of school.
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.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q9)	✓	<input type="checkbox"/>	
<u>Cash Receipts</u>					
F21	Charter school has policies addressing cash receipts.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16)	✓	<input type="checkbox"/>	Sample documents of cash receipts provided and reviewed during interview/meetings
F22	Charter school maintains records of all monies received (e.g., issues receipts).	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash receipts (Binder 6, Tab 17) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q10)	✓	<input type="checkbox"/>	Sample documents of cash receipts provided and reviewed during interview/meetings
F23	Charter school deposits monies in a timely manner.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q11)	✓	<input type="checkbox"/>	When required, deposits completed in a timely manner. As evidenced by samples provided

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F24	Charter school maintains records of deposits of all monies.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash deposits (Binder 6, Tab 18) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q12)	√	<input type="checkbox"/>	Yes, records of 3 sample cash deposits reviewed.
F25	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q13)	√	<input type="checkbox"/>	Back office business support reconciles Bank Statements to ensure receipt and deposit accurately reported. School utilizes Wells Fargo for banking services
<u>Disbursements</u>					
F26	Charter school has policies addressing disbursements.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19)	√	<input type="checkbox"/>	Per Policy Provided in Binder 6 (Business/Finance)
F27	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.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q14)	√	<input type="checkbox"/>	Per school policies, all 3 components of disbursements required.
F28	Checks are signed by authorized employees.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q15)	√	<input type="checkbox"/>	Yes, per Fiscal Policies & Procedures. Board approved authorized signatures at start of school year
F29	Charter school has adopted a system to maintain vendor payment information for	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1,	√	<input type="checkbox"/>	Per LLAC business support, system is maintained for vendor

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	preparation of 1099s.	Tab 2, Q16)			info 1099 prep
F30	Charter school has segregated duties between purchasing, receiving, and accounts payable.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q17)	√	<input type="checkbox"/>	Per policy provided, segregated duties required of purchasing process
<u>Payroll</u>					
F31	Staff Org Chart	<input type="checkbox"/>	√	√	Included in Binder 6 (Business/Finance) provided to review team. Org chart detailing LLAC's 10 charter school's with Diego Hills as a member is a cause of concern re: school's independence from the LLAC organization
F32	Charter school has a salary schedule or other satisfactory salary structure.	<input type="checkbox"/> Salary schedule (Binder 6, Tab 21)		√	Included in Binder 6 (Business/Finance) provided to review team. Limited steps in schedule. Concern related to leadership positions allocated to school but not included in salary documentation disclosed (CEO/CFO/Nat'l Supt'd/Area Supt'd)
F33	Tax deposits are completed in a timely manner.	<input type="checkbox"/> Proof of tax deposits (Binder 6, Tab 22) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q18)	√	<input type="checkbox"/>	Copies of tax deposits provided. Demonstrate deposited completed in timely manner
F34	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	<input type="checkbox"/> Proof of recording of earnings (Binder 6, Tab 23) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q18)	√	<input type="checkbox"/>	School does not offer PERS/STRS to its employees. Social Security properly recorded via payroll

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F35	Charter school has system to provide STRS data to authorizer.	<input type="checkbox"/> Proof of submission of STRS data (Binder 6, Tab 24) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q20)	✓	<input type="checkbox"/>	N/A. STRS not offered to school employees
F36	Charter school has system to maintain employee earning records for preparation of W-2s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q21)	✓	<input type="checkbox"/>	Payroll processing provided evidence of appropriate maintaining of earning records for preparation of W2s
<u>Equipment Inventory</u>					
F39	Charter school has policies addressing the purchase and maintenance of equipment.	<input type="checkbox"/> Equipment purchase and maintenance policy (Binder 6, Tab 25)	✓	<input type="checkbox"/>	Per policies provided, school addresses the purchase and maintenance of equipment
F40	Charter school maintains an equipment inventory that is physically located on each site.	<input type="checkbox"/> Equipment inventory (Binder 6, Tab 26)	✓	<input type="checkbox"/>	Copy of inventory schedule provided during interview/meetings
F41	Equipment purchased with federal funds is properly identified.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q22)	✓	<input type="checkbox"/>	Per accounting via restricted resource codes, equipment, if any identified
<u>Student Attendance (All Schools)</u>					
F42	Charter school uses a generally approved attendance accounting system.	<input type="checkbox"/> Screenshot of attendance accounting system (Binder 6, Tab 27)	✓	<input type="checkbox"/>	School provides all fiscal reports via generally approved accounting system. Pathways is system school uses
F43	There is a designated staff person responsible for administering attendance.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20)	✓	<input type="checkbox"/>	Director of Finance & support staff responsible for attendance

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
					accounting
F44	Charter school calendar includes a minimum of 175 instructional days.	<input type="checkbox"/> School calendar (Binder 6, Tab 28)	✓	<input type="checkbox"/>	Calendar provided during interview/meetings provided evidence of sufficient minimum number of instructional days
F45	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).	<input type="checkbox"/> Class/bell schedule (Binder 6, Tab 29)	✓	<input type="checkbox"/>	Reports verifying minimum required minutes for each grade range provided in Binder 6 and during meeting/interview. Instructional Lead for DCOT reviewed compliance of minimum instructional minutes as well
F46	Student absences are excluded from apportionment days.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q1)	✓	<input type="checkbox"/>	Review of sample attendance report for October 2019 provided evidence that student absences are excluded from apportionment days
F47	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q2)	✓	<input type="checkbox"/>	Review of teacher credentials for teachers' registers claiming ADA provides evidence via HR Lead of DCOT credentialing audit of certificated staff
F48	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 31)	✓	<input type="checkbox"/>	Documents provided for review confirmed submission of all attendance to authorizer as well as CDE. It was noted school experienced an approx. 200 ADA drop in FY 2019-20 due to its relocation to a new facility
F49	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	✓	<input type="checkbox"/>	Review of enrolling process indicates school has clear procedures for enrolling students.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F50	Charter school has clear procedures for disenrolling students and providing notification to the student's district of residence.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	√	<input type="checkbox"/>	For the example noted in item 47 above, school has a clear process for disenrolling students from its program during the summer.
F51	Charter school has clear procedures for claiming and reporting ADA to the state.	<input type="checkbox"/> Policies and procedures related to claiming and reporting ADA (Binder 6, Tab 33)	√	<input type="checkbox"/>	Policies and procedures noted were clearly sufficient for the schools' claiming and reporting of ADA to the state
F50	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	<input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q3)	√	<input type="checkbox"/>	Per process review and sample ADA reports, school demonstrated it ensures students are not enrolled in more than one track for apportionment claiming purposes
<u>Student Attendance (Schools Offering Independent Study)</u>					
F51	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).	<input type="checkbox"/> Certification (Binder 6, Tab 34) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q1)	√	<input type="checkbox"/>	Evidence provided to Instructional Lead of DCOT during review of Independent Study courses provided to students. Instructional Lead of DCOT verified rigor of courses
F52	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q1) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q1) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q2)	√	<input type="checkbox"/>	Per Educational Lead of DCOT, communication with teacher and students occur minimally at least twice a month

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F53	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/initialled and dated by supervising teacher).	<input type="checkbox"/> Sample grade books (Binder 6, Tab 35) <input type="checkbox"/> Sample transcripts (Binder 6, Tab 36) <input type="checkbox"/> Work samples (Binder 6, Tab 37) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q2)	✓	<input type="checkbox"/>	Review of sample list of student grade books, transcripts and work samples provided evidence of process for ensuring satisfactory progress for independent study students. Instructional Lead of DCOT provided review of appropriateness of credit given to students
F54	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).	<input type="checkbox"/> List of course offerings (Binder 6, Tab 38)	✓	<input type="checkbox"/>	Course listings provided in Binder 6 (Business/Finance) Instructional Lead for DCOT reviewed course list for compliance and confirmed course offerings
F55	The program of each student in independent study is overseen by a certificated employee.	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q4) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q3)	✓	<input type="checkbox"/>	Per review of HR Lead of DCOT, compliance of student independent study work overseen by a certificated employee
F56	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).	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q2) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q4)	✓	<input type="checkbox"/>	Review of sample ADA report by teacher by student provided evidence school met ratio of ADA to FTE Certificated employees

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F57	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.	<input type="checkbox"/> Board policy (Binder 6, Tab 40) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q5) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q5)	✓	<input type="checkbox"/>	Documents provided during review/meetings indicated policy exists regarding maximum length of time that may elapse between independent study assignment and completion. Item also reviewed by Instruction Lead for DCOT
F58	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.	<input type="checkbox"/> Board policy (Binder 6, Tab 41) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q6) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q6)	✓	<input type="checkbox"/>	Documents provided during review/meetings indicated policy exists regarding number of missed assignments allowed before an evaluation is conducted showed evidence of sufficient policy. Instructional Lead for DCOT also reviewed item for appropriateness
F59	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	<input type="checkbox"/> Sample agreements (Binder 6, Tab 42) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q7) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q7)	✓	<input type="checkbox"/>	Per samples and process reviewed during interviews/meetings, evidence of agreements being on file for each student on Independent Study is sufficient
F60	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q3)	✓	<input type="checkbox"/>	Per Special Education Lead for DCOT, confirmed students don't participate in independent study unless IEPs provide for placement. School is member of East County SELPA
F61	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q4)	✓	<input type="checkbox"/>	Per review and interviews/meetings, no funds or items of value given to independent study students that are not provided to students attending regular classroom programs. Item really not applicable. All

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
					students are independent study students
F62	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.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q5)	✓	<input type="checkbox"/>	All students reviewed are located in county which apportionment is reported or who are residents of a county immediately adjacent to the county in which apportionment is reported
F63	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q6) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q8) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q8)	✓	<input type="checkbox"/>	Documents provided during interview/meetings and review of sample student records, registers and work products demonstrated process of evaluating work of students is performed by certificated teachers. Also, see review by HR Lead of DCOT re this item
F64	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q7)	✓	<input type="checkbox"/>	Documents provided during interview/meetings and review of sample student records, registers and work products coupled with teacher approval of work provides evidence school claims apportionment credit only for time value of student work judged by a certificated teacher. See review by HR Lead of DCOT for further confirmation
F65	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 type="checkbox"/> Request for determination of funding (Binder 6, Tab 44) <input type="checkbox"/> SBE determination of funding (Binder 6, Tab 45)	✓	<input type="checkbox"/>	Request for funding determination as well as CDE issued funding determination was Provided during interview/meetings.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
					<p><i>If school <u>does not</u> offer independent study:</i> Total “No” Responses: _____ Risk Assessment: 13-24 Moderate 25+ 0-12 Low High</p> <p><i>If school <u>does</u> offer independent study:</i> Total “No” Responses: _____ Risk Assessment: 17-32 Moderate 33+ 0-16 Low High</p>

815-21/4533779.4

Diego Hills Charter: Personnel

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

DIEGO HILLS CENTRAL PERSONNEL OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
All Employees					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 0-N/A 	✓		Charter revised 10/2019 New MOU 9/4/19 with Teach for America
P2	Charter school employee handbook and policies guarantee fair hiring practices.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) 	✓		
P3	Charter school enters employment contracts with all persons hired to work at school.	<ul style="list-style-type: none"> Sample employment contracts (Binder 5, Tab 5) 3 Samples 	✓		Sample: 1 Special Education teacher 1 Tutor 2 blank sample contracts: Salary and Hourly
P4	All employees have been fingerprinted, including Department of Justice background checks.	<ul style="list-style-type: none"> Documentation of fingerprint clearance for all employees (Binder 5, Tab 6) 	✓		No DOJ Clearances available in T-6 At site visit received a complete list of staff. Total of 64 staff with DOJ clearances.
P5	All employees have passed the TB test and results are current.	<ul style="list-style-type: none"> Documentation of current TB test results for all employees (Binder 5, Tab 7) 	✓		No TB Clearances available in T-7 At site visit received a complete list of staff. Total of 64 staff with TB Clearances
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 8) 	✓		36 certificates - Need staffing list At site visit staffing list and 64 certificates - completed AB 1432 training.
P7	If charter school employs 50+ employees, all supervisors have undergone anti-harassment training,	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 9) 	✓		6 certificates -wrong: non manager At site visit - verified 4 supervisors -

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

	including harassment based on sexual orientation and gender identity and expression.			All completed training
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	• Observation of main office (Binder 1, Tab 11, Q4)	✓	Verification received at site visit - copies attached
P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	• Employee handbook (Binder 5, Tab 1)	✓	Handbook - pg 59 6.2
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	• Employee handbook (Binder 5, Tab 1)	✓	Handbook - Pg 68 6.7
P11	Governing board approves personnel actions.	• Governing board minutes (Binder 5, Tab 10)	✓	3 sample meetings No personnel actions listed for board to approve

Certificated Employees

P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	MOU - Teach for America contract
P13	Charter school provides teachers with professional development opportunities.	<ul style="list-style-type: none"> Professional development calendar (Binder 5, Tab 12) Professional development session agenda (Binder 5, Tab 13) Teacher interview (Binder 1, Tab 4, Q2) 	✓	PD - 2018-19 Only. Need 2019-20 Site visit: Recieved 2019-20 list of PD and a list of staff and PD completed by each person. Included 4 examples of PD Completed teacher interview at site visit - Math teacher
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.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by core teachers (Binder 5, Tab 14) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	39 certificated staff T-14 All verified with teaching credentials in core areas

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by teachers (Binder 5, Tab 15) 	✓	Org chart does not specify the number of employed teachers. New list at site visit - Assignments & Credentials verified with EL authorizations.
P16	Teachers providing special education and related services have required credentials and certifications.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by special education teachers (Binder 5, Tab 16) 	✓	org chart does not specify the number of Special Ed teachers. New list at site visit - 7 Special Ed teachers verified all with Sp Ed Credential authorizations
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	<ul style="list-style-type: none"> Sample evaluations (Binder 5, Tab 17) Teacher interview (Binder 1, Tab 4, Q3) 	✓	Sample Evaluations on 5 teachers for 6/2019 Completed teacher interview at sight visit - Science Teacher
Classified Employees				
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.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of qualifications held by classified aides (Binder 5, Tab 18) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	Need Staff list & assignments to review Received classified staffing list with degrees and college coursework verified. DHC requires 2 years minimum of education to work with students as an assistant.

815-21/4533780.4

Total "No" Responses:
Risk Assessment:

0-4 Low 5-8 Moderate 9+ High

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Diego Hills Charter: Educational Program

Assigned District Staff Person: Linda Kimball
 Position of Assigned Staff Person: Educational Program Lead

DIEGO HILLS CENTRAL EDUCATIONAL PROGRAM OVERSIGHT CHECKLIST

Items pertaining to Special Education are marked N/A in Comments and are addressed in the Special Education Oversight Checklist

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) 	√	<input type="checkbox"/>	
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q1) 	√	<input type="checkbox"/>	
E3	Charter school staffing complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Staffing chart (Binder 2, Tab 3) 	√	<input type="checkbox"/>	
E4	Charter school staffing is sufficient to carry out educational program.	<ul style="list-style-type: none"> Staffing chart (Binder 2, Tab 3) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
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.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) 	√	<input type="checkbox"/>	
E6	Charter school has obtained WASC accreditation, if applicable.	<ul style="list-style-type: none"> WASC accreditation (Binder 2, Tab 5) 	√	<input type="checkbox"/>	
<u>Services to Special Populations</u>					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q4) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> • Student handbook (Binder 2, Tab 4) • SELPA policies and procedures manual (Binder 2, Tab 6) • CALPADS reports for Fall 1 submission (Binder 2, Tab 7) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q5) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> • Sample IEPs (Binder 2, Tab 8) • Sample 504 plans (Binder 2, Tab 9) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E11	All required members of IEP teams attend IEP meetings.	<ul style="list-style-type: none"> • Sample IEPs (Binder 2, Tab 8) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<ul style="list-style-type: none"> • Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E13	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"> • Director of finance (or equivalent) interview (Binder 1, Tab 2, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A
E14	Charter school follows process for identification and reclassification of students who are English Learners.	<ul style="list-style-type: none"> • Student handbook (Binder 2, Tab 4) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q7) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E15	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"> • Student handbook (Binder 2, Tab 4) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q8) 	√	<input type="checkbox"/>	
<u>Curricular Materials</u>					
E16	Charter school uses standards-aligned instructional materials.	<ul style="list-style-type: none"> • Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) • Classroom observations (Binder 1, Tab 10, Q1) 	√	<input type="checkbox"/>	
E17	Charter school uses instructional materials that address the specific needs of English Learners.	<ul style="list-style-type: none"> • Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q9) • Classroom observations (Binder 1, Tab 10, Q2) 	√	<input type="checkbox"/>	
E18	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"> • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q10) • Classroom observations (Binder 1, Tab 10, Q3) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E19	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"> • Class schedule (Binder 2, Tab 11) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q11) • Classroom observations (Binder 1, Tab 10, Q4) 	✓	<input type="checkbox"/>	
<u>Assessment</u>					
E20	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"> • Assessment calendar (Binder 2, Tab 12) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) 	✓	<input type="checkbox"/>	
E21	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607(b).	<ul style="list-style-type: none"> • SBAC (Binder 2, Tab 13) • Dashboard Data (Binder 2, Tab 14) 	✓	<input type="checkbox"/>	Although academic performance is low, it is not out of alignment given the nature of the charter school and would not likely threaten renewal.
E22	Charter school has completed and timely posted a SARC containing required elements.	<ul style="list-style-type: none"> • SARC (Binder 2, Tab 15) 	✓	<input type="checkbox"/>	
E23	Charter school regularly collects student achievement data and reports it to parents and staff.	<ul style="list-style-type: none"> • Sample data reports to parents (Binder 2, Tab 16) • Sample data reports to staff (Binder 2, Tab 17) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q13) 	✓	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E24	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"> • Notifications (Binder 2, Tab 18) 	√	<input type="checkbox"/>	
E25	Charter school has current LCAP/LCAP Update that has been presented to, reviewed and approved by the Charter School's governing board.	<ul style="list-style-type: none"> • LCAP/LCAP update (Binder 2, Tab 19) • Minutes from Board meeting (Binder 2, Tab 20) 	√	<input type="checkbox"/>	
E26	Title I funds/categorical funding are being used to supplement the school's LCAP goals.	<ul style="list-style-type: none"> • LCAP/LCAP update (Binder 2, Tab 19) • Director of finance (or equivalent) interview (Binder 1, Tab 2, Q2) 	√	<input type="checkbox"/>	
<u>Admissions</u>					
E27	Charter school complies with the admissions practices described in the approved charter.	<ul style="list-style-type: none"> • Approved charter (Binder 2, Tab 1) • Admissions/enrollment forms and policies (Binder 2, Tab 21) • Lottery procedures (Binder 2, Tab 22) 	√	<input type="checkbox"/>	
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<ul style="list-style-type: none"> • Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	N/A

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	<ul style="list-style-type: none"> Charter school student data (Binder 2, Tab 23) Student data from nearby school districts (Binder 2, Tab 24) 	√	<input type="checkbox"/>	<p>The school serves far more students who are at risk than the chartering district. For example:</p> <ul style="list-style-type: none"> 83% of the students are socioeconomically disadvantaged. 10% are homeless. 32% of the students are English Learners.
E30	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 cover options and enrollment assistance information.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	
E31	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.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Discipline</u>					
E32	Charter school discipline policies and practices are consistent with terms of charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E33	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.	<ul style="list-style-type: none"> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q14) 	<input type="checkbox"/>	<input type="checkbox"/>	
E34	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"> Discipline data (Binder 2, Tab 26) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Health and Safety</u>					
E35	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.	<ul style="list-style-type: none"> School safety plan (Binder 2, Tab 27) 	<input type="checkbox"/>	<input type="checkbox"/>	
E36	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"> Training sign-in sheets (Binder 2, Tab 28) Observation of main office (Binder 1, Tab 11, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>	
E37	Charter school has a policy/procedure for visitors to enter and leave campus.	<ul style="list-style-type: none"> Policy or procedure (Binder 2, Tab 29) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E38	Charter school provides for the screening of pupils' vision, hearing, screening for scoliosis, and required immunizations.	<ul style="list-style-type: none"> Records of student screenings (Binder 2, Tab 30) 	<input type="checkbox"/>	<input type="checkbox"/>	
E39	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"> Suicide Prevention Policy (Binder 2, Tab 31) Board meeting minutes (Binder 2, Tab 32) 	<input type="checkbox"/>	<input type="checkbox"/>	
E40	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 findings are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> Application for universal meal service (Binder 2, Tab 33) Governing board resolution (Binder 2, Tab 34) 	<input type="checkbox"/>	<input type="checkbox"/>	
E41	Charter school provides at least one meal per day to students who qualify for FRPL.	<ul style="list-style-type: none"> Executive director (or equivalent) interview (Binder 1, Tab 3, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	
E42	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"> Screenshot from website (Binder 2, Tab 35) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E43	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.	<ul style="list-style-type: none"> Sexual health and HIV prevention education course description (Binder 2, Tab 36) 	<input type="checkbox"/>	<input type="checkbox"/>	
E44	By January 1, 2020, 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.	<ul style="list-style-type: none"> Policy or other description of method for informing parents/guardians (Binder 2, Tab 37) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Parent Notifications</u>					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 38) 	<input type="checkbox"/>	<input type="checkbox"/>	
E46	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).	<ul style="list-style-type: none"> Notice (Binder 2, Tab 39) 	<input type="checkbox"/>	<input type="checkbox"/>	
E47	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"> Notice (Binder 2, Tab 40) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E48	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.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 41) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Student Records</u>					
E49	Charter school maintains comprehensive records regarding its students.	<ul style="list-style-type: none"> Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42) 	√	<input type="checkbox"/>	
E50	Charter school maintains student records, including special education records, in a confidential and secure location.	<ul style="list-style-type: none"> Policy regarding confidentiality of student records (Binder 2, Tab 43) Observation of main office (Binder 1, Tab 11, Q3) 		<input type="checkbox"/>	
E51	Charter school has a policy or procedure for parents to review student files, including a log.	<ul style="list-style-type: none"> Policy regarding review of records (Binder 2, Tab 44) 	<input type="checkbox"/>	<input type="checkbox"/>	
E52	Charter school has policy or procedure regarding release of student information.	<ul style="list-style-type: none"> Policy regarding release of student information (Binder 2, Tab 45) 	<input type="checkbox"/>	<input type="checkbox"/>	
E53	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q15) 	<input type="checkbox"/>	<input type="checkbox"/>	
815-21/4535127.4			Total "No" Responses: 0 Risk Assessment: 0-13 Low 14-26 Moderate 27+ High		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:
 JoAnn Murphy
 Position of Assigned Staff Person:
 Special Education Lead

DIEGO HILLS CENTRAL SPECIAL EDUCATION OVERSIGHT CHECKLIST

Diego Hills is an LEA within the El Dorado County SELPA for special education purposes 7/1/17.
 7/1/17MOU with El Dorado County SELPA for special education purposes. Did not see an MOU from Dehesa

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<input checked="" type="checkbox"/> Approved charter (Binder 2, Tab 1) <input checked="" type="checkbox"/> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, 01)	X		<p>School has a comprehensive plan to monitor and utilize data driven curricular and instructional decisions. Also uses supplemental and diagnostic assessments to track student growth. NWEA Map Testing.</p> <p>Did not meet the statewide target in math achievement for students with disabilities (=8.93% with a required target of 12.6%). Math should be a focus area.</p>
E3	Charter school staffing complies with approved charter.	<input type="checkbox"/> Approved charter (Binder 2, Tab 2) <input checked="" type="checkbox"/> Staffing chart (Binder, 2 Tab 3)	X		Oversight Dehesa and El Dorado See MOU for El Dorado
E4	Charter school staffing is sufficient to carry out educational program.	<input checked="" type="checkbox"/> Staffing chart (Binder 2, Tab 3) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2)	X		Educational program is supported by program specialists, case managers in addition to general and special education teachers.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
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.	<input type="checkbox"/> Student handbook (Binder 2, Tab 4)			N/A
E6	Charter school has obtained WASC accreditation if applicable.	<input checked="" type="checkbox"/> WASC accreditation (Binder, 2 Tab 5)	X		
Services to Special Populations					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<input checked="" type="checkbox"/> Student handbook (Binder 2, Tab 4) <input checked="" type="checkbox"/> SELPA policies and procedures manual (Binder 2, Tab 6) <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3)	X		The school follows policies and procedures of the SELPA. Students enroll with a current IEP and assigned to both a general education teacher for inclusion in the general education program and receive specialized academic instruction from an education specialist. Oversight EI Dorado
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<input checked="" type="checkbox"/> SELPA policies and procedures manual <input checked="" type="checkbox"/> Interview (Binder 1, Tab 1, Q4) <input checked="" type="checkbox"/> Special Education Information System (SEIS)	X		All parents receive a notice informing them of process, supports and services available for a child with a suspected disability. The school has a robust pre-referral process available when students struggle or may need further assessment. Upon completion of assessment the IEP team will determine eligibility and determine needs and services. Oversight EI Dorado

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<input checked="" type="checkbox"/> SELPA policies and procedures manual (Binder 2, Tab 6) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, QS) <input checked="" type="checkbox"/> Annual Performance Report <input checked="" type="checkbox"/> SEIS unannounced	X		Charter school administrative procedures are followed. Timelines were verified by unannounced SEIS review of random IEPs and school-wide SEIS compliance summary. School was flagged for DINC on expired IEP that students enrolled with – that has been cleared. All IEPs are current. Oversight EI Dorado
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<input checked="" type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) <input checked="" type="checkbox"/> SEIS	X		No evidence that service tracker or some method of documentation is used to track the provision of services in the IEP—This is not a risk area for Dehesa oversight. Oversight EI Dorado
E11	All required members of IEP teams attend IEP meetings.	<input type="checkbox"/> Sample IEPs (Binder 2, Tab 8)			IEP Team consists of program specialist, case managers, general education teacher, special education technician, and parent. Oversight EI Dorado
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<input type="checkbox"/> Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10)			21% of school population is students with disabilities; the statewide average is 11.9% of the general education population. Diego Hills has a high special education enrollment.
E13	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Qi)	X		6500 resource code expenditures are diligently reviewed to ensure that Special Education funds are used appropriately.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Assessment					
E20	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"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) <input checked="" type="checkbox"/> Annual Performance Report	X PIR		<p>Did not meet state targets for English/Language Arts and Math Participation rate and also did not meet target for math achievement rate. Identified for PIR monitoring</p> <p>Oversight by EI Dorado for resolution of PIR</p>
Admissions					
E27	Charter school complies with the admissions practices described in the approved charter.	<input checked="" type="checkbox"/> Admissions/enrollment forms and policies (Binder 2, Tab 21) and EI Dorado SELPA	X		
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<input checked="" type="checkbox"/> Admissions/enrollment forms and policies (Binder 2, Tab 21) <input checked="" type="checkbox"/> EI Dorado IEP Procedures	X		The admissions process is the same but for students with an IEP, the IEP is reviewed and an interim IEP is scheduled per administrative procedures of the EI Dorado SELPA
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background students with disabilities, English learners, and FRPL students).	<input checked="" type="checkbox"/> Charter school student data (Binder 2, CALPADS, Tab 23) <input type="checkbox"/> Student data from nearby school districts (Binder 2, Tab 24)	X		<p>Dehesa EI 13.18% FRPL 51% SPED 14.6%</p> <p>Diego Hills EL 16.2% FRPL 84% SPED 21%</p>

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Discipline					
E33	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 <input checked="" type="checkbox"/> El Dorado Procedural Manual <input checked="" type="checkbox"/> Annual Performance Report of students with disabilities (Binder 2, Tab 25) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab I 014)	X		Discipline Policies for special education are found under the administrative procedural manual. El Dorado SELPA has oversight in this area.
E34	Charter school has not disproportionately suspended or expelled students of certain racial or ethnic backgrounds, or students with disabilities.	<input type="checkbox"/> Discipline data (Binder 2, Tab 26) <input checked="" type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) <input checked="" type="checkbox"/> Annual Performance Report	X		Annual Performance Indicator for Special Education and LCAP report 0 suspensions and expulsions
Student Records					
E50	Charter school maintains student records, including special education records, in a confidential and secure location.	<input checked="" type="checkbox"/> Policy regarding confidentiality of student records (Binder 2, Tab 43) <input type="checkbox"/> Observation of main office (Binder 1, Tab 11, Q3)	X		Policy in place for the confidentiality of all student records including special education
E51	Charter school has a policy or procedure for parents to review student files, including a log.	<input checked="" type="checkbox"/> Policy regarding review of records (Binder 2, Tab 44)	X		
E52	Charter school has policy or procedure regarding release of student information.	<input checked="" type="checkbox"/> Policy regarding release of student information (Binder 2, Tab 45)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E53	Teachers have reasonable access to Special education records	√ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q15)	X		All special education IEP files are maintain in the Special Education Student Information (SEIS). Access is controlled through a user ID and password. General Education teachers have read only access. Special Education teachers, Program Specialists and administrative have full access to special education files.

Assigned District Staff: Justin Cunningham
 Position of Assigned Staff Person: Project Lead

DIEGO HILLS CENTRAL OPERATIONS/FACILITIES OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Maintenance of Facilities</u>					
O32	A designated person is responsible for overseeing operations and facilities management.	√ Staff organizational chart (Binder 4, Tab 1)	X		Solliman Villaondo
O33	Facilities are adequate for number of students and types of programs.	<input type="checkbox"/> Capacity chart for campus facilities (Binder 4, Tab 2) √ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q1)	X		The Evidence was sent in prior to DHC locating to the present site on 54th St; upon observation it has more than enough capacity.
O34	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.	√ Inspection logs (Binder 4, Tab 3) √ Operations manager (or equivalent) interview ((Binder 1, Tab 5, Q2)	X		Alex Yoshinaga
<u>Legal Compliance</u>					
O35	All facilities meet Americans with Disabilities Act requirements.	<input type="checkbox"/> ADA certification (Binder 4, Tab 4)	X		
O36	All single-user restrooms have been designated as all-gender restrooms.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q3)	X		Included under the Temporary Certificate of Occupancy
O37	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	√ Asbestos Management Plan (Binder 4, Tab 5)	X		EMSL Analytical Inc.
O38	Charter school has certificate of occupancy on file.	√ Certificate of occupancy (Binder 4, Tab 6)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O39	Charter school has conditional use permit on file, as applicable.	√ Conditional use permit (Binder 4, Tab 7)	X		
O40	Charter school has safety inspection by local fire department on file.	<input type="checkbox"/> Safety inspection by local fire department (Binder 4, Tab 8)	X	X	Fire Alarm inspection only
O41	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.	√ Emergency action plan (Binder 4, Tab 9) √ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q4)	X		AED is available at DHC
O42	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.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q5)	X		
O43	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.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q12)	X		There is a parenting room and 4 offices
O44	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	√ Certificates of insurance (Binder 4, Tab 10)	X		
O45	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q7)	X	X	To be adjudicated

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O46	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 (Binder 4, Tab 11) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q8, Q9)	X		
O47	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 (Binder 4, Tab 11) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q10)	X		
			Total "No" Responses: <u>1</u>		
			Risk Assessment: 0-4 Low 5-7 Moderate 8+ High		

The overall Diego Hills Central response to the Facilities and Operations Oversight was forthcoming and transparent, particularly at the site level.

815-21/4533461.4

Dehesa Charter Oversight Report

**Inspire Charter
Schools
Authorized
by Dehesa**

Inspire Charter Schools Authorized by Dehesa: Governance

General Inspire Context

Inspire had a complex corporate structure that was changed in the summer of 2019 without prior notice to or approval by Dehesa. Previously, Inspire Charter Schools (“ICS”) was incorporated in 2013 to “manage, operate, guide, direct and promote” one or more California charter schools. It was named the “sole statutory member” of the corporations that held the charters for the various individual Inspire schools. Inspire District Office (“IDO”) was incorporated in 2017 “to perform the functions of, or to carry out the purposes of” various named charter schools including Inspire Charter School – South (which became Cabrillo Point Academy) and Learning Latitudes Charter School (which became Pacific Coast Academy). IDO changed its name to Provenance in July 2018. The incorporator for both organizations was Herbert Nichols; Chris Williams is given as the addressee for both IDO/Provenance and ICS in state filings in 2019.) This structure meant that ICS confirmed the directors for each of the school governing boards and IDO/Provenance provided both educational and administrative services to the individual schools, collecting 15% of revenue for the service. The schools also paid fees to a back-office provider, Charter Impact, for financial services under a master agreement with ICS.

In July and August 2019, the Cabrillo Point and Pacific Coast governing boards amended their bylaws to eliminate the sole statutory member and developed methods to recruit and elect their own directors. Following the change in bylaws, the boards approved a series of new agreements with Provenance, Charter Impact and with the other schools in the Inspire network that appear to have continued past relationships and practices. Board members and school leadership continue to refer to Provenance, Inspire District Office and Inspire Charter Schools as if they are interchangeable. This report uses the name Provenance though many of the agreements show Inspire District Office DBA Provenance and frequently referred to just “District Office.”

General Inspire Concerns

- Charter law requires approval by the authorizer for material revision of an existing charter. Although the MOUs for the two Inspire schools do not contain a definition of “material revision” the sample MOU of the State Board of Education includes governance structure as material changes. (Dehesa’s MOU for the Diego Hills charter includes this definition also.) No material revision was applied for by the school and Dehesa was not informed of this significant change. Current charter language therefore no longer reflects the current governance.
- The approval of the governance change occurred in the summer of 2019, but minutes of board meetings during that period show no discussion about the change and the meetings seem short relative to the importance and complexity of the topics. They also reflect multiple board member resignations and election of new board members, while at the same time approval of various service agreements, policies and debt instruments were approved unanimously and without apparent discussion. This raises questions both about how well-informed the new board members were, and how “independent” the separate entities were really intended to be.
- Even before the change the charter language was misleading as it failed to disclose the power of the sole statutory member to choose/reappoint/remove board members (and veto changes to bylaws and charter), or whether it disclosed the existing administrative and educational support contracts with related nonprofit (Provenance), and we saw no evidence that they described the positions of executive director, deputy executive director and regional director are shared positions over whom the charter board does not have control.
- There does not appear to have been a specific timeline for the various legal steps toward the new more “independent” governance structure. For example, agreements related to the transition were presented to the boards for approval as retroactive by many months. There is also no evidence of a plan for developing the capacity of the new governing boards to function effectively as separate corporations acting

solely on behalf of their own school communities.

- Due to shared senior staff and common paymaster, plus complex leasing arrangement for teaching staff, supervision and management of staff is very complicated. Ability to hold senior staff accountable for school outcomes is limited. Personnel actions do not appear on board agendas, except some compensation issues. No documentation was provided by either school of evaluation of school leadership by the board.
- Provenance (renamed version of Inspire District Office and incorporated by the same individual as Inspire Charter Schools) appears to at first continue the role of Inspire Charter Schools – providing services, but also leadership and direction to the inexperienced boards of Pacific Coast and Cabrillo Point.
- Although operating as a charter management organization, governance of Provenance remains opaque, leaving many questions, including the disposition of the very large amount of money collected from the individual schools (15% of revenue). The amount of money collected appears excessive relative to the services provided.

Recommendations

- Require submission of a request for material revision of the charters with respect to governance and any other areas of material change in program or operations.
- Request a plan from the boards of the two individual schools for the transition to fully independent governance, including development of each board's ability to operate effectively as an independent governing body. The plan should include strategies for board development, such as diverse board composition, staggered terms, nominating process and comprehensive training. Plan should also include means to hold school leadership accountable for performance goals and to evaluate alternatives to the current services contracts.
- Request a plan from PCA that will modify the contract with Provenance and bring
- operations within the school to ensure the school complies with current laws regarding transparency and accountability. Charter bylaws and relevant policies should be amended to be consistent with these requirements.



Dehesa Charter Oversight Report

Cabrillo Point Academy

Cabrillo Point Academy: Governance

Specific Context

Cabrillo Point Academy was originally incorporated as Inspire Charter School South in May 2017 and officially renamed in corporate records this year. The school grew significantly in its first two years, but enrollment has since leveled off at around 4,500. New board members were elected in the second half of 2019 when the by-laws were changed to eliminate ICS as “sole statutory member.” Board members have homeschooling experience, but limited other relevant expertise.

Specific Concerns

- As with Pacific Coast, board packets are complete, but per observation of J. Cunningham, members appear to have a limited understanding of the key issues in school governance such as finance, and are heavily reliant on the principal and Charter Impact.
- Board remains heavily influenced by principal and service providers. For example, the board was not involved in responding to notice of concern from Dehesa and no effort had been made to explore possible alternatives to expensive Provenance services.
- The charter states that one director position will be reserved for a parent or community member. Minutes are so limited there is no indication of whether this was considered in the board election process; no evidence of any outreach or criteria for board selection, and no goals for board composition.
- Is the organization operated and governed effectively?
 - ◊ Governance is weak, with a new and inexperienced board heavily influenced by the principal and service providers, which operates as leadership at this time. The elimination of the sole statutory member was not accompanied by any plan for developing board capacity or a schedule of key contracts and decisions. Decision-making appears to remain “top down” through Provenance; costly contracts for services remain in place; complex arrangements for shared staff continue. The board is not in a position to hold leadership accountable for the performance of the individual school.
- Is the school meeting public policy purposes?
 - ◊ The significant role of Provenance in school operations combined with Provenance’s lack of transparency undermines public policy goals. The structure makes it difficult for the board to govern based on school outcomes.

Oversight Checklist Risk Assessment: Moderate

Overall Risk Assessment: Weak

Specific Recommendations

Request development of board development goals, specifically related to range of expertise needed for successful independent governance.

Cabrillo Point Academy: Finance/Business

Context

Review and analysis of documents provided by the charter school, interviews, and reviews of Checklist Compliance Areas were performed during site visits and follow-up communication with the charter school and its

support organization. Due to the sheer volume of checklist items (66) to be reviewed in this section, a scoring system using a formula from the number of “no” responses may not reveal the true risk assessment for the charter. From a strict formula calculation perspective, a score of less than 25% “no” responses or (12 out of 66) indicates a low risk score per the checklist metric. However, after further research, data gathering, analysis and process reviews as a result of data provided and responses from the charter school and its support organization, Provenance, a risk rating of “High” is warranted. Because of this risk concern due to an in-depth review of related processes of items on the checklist, two Risk Scores for Cabrillo Point Academy are provided for this summary. An **Oversight Checklist Risk Assessment** based purely on a calculation of “no” responses to total responses of the checklist is provided. An **Overall Risk Assessment** is also given based on additional review of information provided, processes analysis, and related concerns of risk to the authorizing district.

Concerns

During a site visit on February 26, 2020 in Azusa, CA, site of Inspire District Office facility, the review process began with an interview/meeting with Jenna Lorge, Principal of Cabrillo Point Academy. Cynthia Free, Personnel Lead for the DCOT, also participated in the discussion with Ms. Lorge. Our discussion began with questions regarding the overall school organization, Ms. Lorge’s role and background with the charter school, and the relationship between the school and Inspire District Office. During this conversation, Ms. Lorge volunteered insights into the recent reorganization of the charter school and her newly assigned role as Principal of Cabrillo Point Academy. As a result of our discussion, questions arose regarding the operational relationship with Inspire District Office (Provenance) and the charter school.

During the rest of the interviews and meetings for the day, I found Ms. Lorge to be genuinely motivated and forthcoming in our discussions. It was apparent of her genuine concern and dedication to support the students of the school. It is noted she had been reassigned abruptly into a very difficult situation in what can be described as a “spur of the moment” action at the beginning of the school year in July 2019.

The following items listed below are concerns after review of the Business/Finance checklist and evidence items:

Charter school board appears to be unaware of significant expenditures, fiscal transfers and other major budget actions and decisions. Specifically, payroll transfers for the period of July 2019 through December 2019 totaling over \$10.5M related to the transfer of 593 Inspire DO supported charter staff. It was noted that a good portion of these transfers were completed in October 2019 and November 2019 when transfers were made in one month and then reversed the following month. “Due To/From” intercompany transfers (\$6.9M) from the school’s accounts to several other Inspire District Office supported charter schools as well as the Inspire Foundation are examples of the school board appearing to be unaware of significant expenditures or fiscal activity. No material facts of the above related transactions were found. Typically, resolutions for such transfers are prepared so school boards are certain to become aware of such fiscal transactions.

Transfers were made back and forth to Inspire District Office supported charter schools through City National Bank accounts via general ledger. All 14 Inspire District Office supported charter schools utilize City National Bank. Per an Interschool Lending and Borrowing Policy, as well as a Master Credit Agreement between all 14 Inspire District Office supported schools, temporary lending and borrowing of funds within the Inspire Schools was allowed. However, no request to loan or borrow documents was observed to have been provided or reviewed by the Cabrillo Point Academy School Board other than an exhibit included in the Master Credit Agreement at the June 28, 2019 Cabrillo Point Academy Board Meeting. Per this agreement many transactions for lending and borrowing of funds between the IDO supported charter schools occurred.

No evidence was found of the Cabrillo Point Board's review of material facts for these transactions between the various schools. A particular example of lack of review by the school board involves intercompany transfers between the other 13 Inspire District Office schools and Cabrillo Point Academy. Cause for concern related to the Cabrillo Point Board's awareness of fiscal transfers include the noted payroll transfers mentioned above related to transfers per a Leased Teacher MOU Agreement between the school and the 13 other Inspire District Office supported charter schools. As mentioned above, approximately \$10.5M in payroll transfers affecting 593 teachers/staff were transferred per the Leased Teacher Agreement MOU with all 14 Inspire District Office supported charter schools. Per the Leased Teacher MOU, invoices are to be provided for all transfers between the charter schools.

Per the Leased Teacher MOU Agreement an invoice is to be provided monthly with reasonable back up documentation for costs. As of April 6, 2020 no invoices detailing the transfers had been completed. Through review of documents and board agendas, no approval or acknowledgement of these transfers were found. It is also noted the Leased Teacher MOU agreement was approved by the Board during its October 2019 Board meeting. The transfers detailed above were for staff transfers from July 2019 to December 2019.

Budget review and approval processes meet reasonable requirements for state fiscal reporting. Charter Impact, a subcontractor through Inspire District Office, provides and prepares required fiscal reports, as well as presentations detailing assumptions for projections and state charter education formulas via the Local Control Funding Formula (LCFF). Charter Impact receives 1.75% of Cabrillo Point's LCFF related revenue through its subcontract with Inspire District Office. Charter Impact's fee is paid from Inspire District Office's fee agreement of 15% of the school's LCFF revenue with Cabrillo Point Academy. The review noted the agreements between Cabrillo Point and Inspire District Office, and the agreement between Inspire District Office and Charter Impact had redundant scope of work items listed in the agreements.

Upon review of the latest fiscal projections for the school per the 2nd interim report, the school is projecting an annual surplus of 4% of total revenues. During review of budget, fiscal and other related data, as well as during communications with Charter Impact, it was evident the Charter Impact team has a strong working knowledge of accounting, education finance, fiscal reporting and presentations of financial information. Specifically, Spencer Styles, CEO of Charter Impact, was very aware and knowledgeable of the school's operations and able to provide quick responses to most all questions and clarification items. However, the review process did provide concern regarding the collective capacity of the Cabrillo Point Academy Board. Most often during questions to the Principal on fiscal approval or budget issues, responses were deferred to Mr. Styles or Charter Impact staff.

One particular example the review found was the significant change in the ADA projection utilized for the FY 2019-20 adopted budget vs a September 2019 budget update. Per the budget adoption, an ADA figure of 3,328 was utilized as projected ADA. Per the September budget update projections, an ADA projection figure of 4,446 ADA was utilized. This represents an increase of 1,118 ADA, or 33.6%, over a couple month time period. No reasonable explanation could be found in discussion items or agenda items of the related board meetings where these changes were presented. There was mention of ADA changes being related to "staffing changes" in the September 2019 budget update presentation.

In addition, it appears the 2018-19 unaudited actuals report was never approved or included in an agenda item of the school's board meetings. It was noted the school did provide a copy of the unaudited actuals report to the authorizing district. However, no evidence of the report being presented or included in an agenda item at a school board meeting could be found.

The relationship between Cabrillo Point and Inspire District Office via its current agreement, as compared to prior year practices, represents a concern regarding Cabrillo Point's independence of its operations. Cabrillo Point in the current year changed from being one of several "Inspire Charter Schools" to an more independent school. In essence, all Inspire Charter Schools and their network of schools converted to independent schools with Inspire District Office serving as "back office" support in the current year. The Inspire Charter School network of prior years' appears to be very evident and present via the many MOU's, intercompany transfers between Inspire Charter Schools, temporary lending and borrowing agreements between Inspire Charter Schools.

It appears many of the processes utilized in the prior years when Inspire Schools controlled operations of the schools are currently in place. With ADA projected of 4,446 for the current school year, the school pays Inspire District Office 15% of its LCFF revenues for administration and educational services. This equates to approximately \$6M expenditure in the current year from Cabrillo Point. Inspire District Office supported charter schools project a total of about 36,000 ADA in the current school year for all its supported schools (14). With an agreement of a 15% fee for services at all its 14 schools, Inspire District Office potentially will realize about \$46M in revenues for FY 2019-20 as an organization.

Part of the review process included asking the question of Inspire District Office to share its allocation methods or pro rata formulas of its costs relating to its support services of Cabrillo Point compared to the 15% of revenue fees received.

Initially, the current Executive Director did not respond to the request for such information. When prompted a second time on whether he would be willing to provide such data, his response was to call a meeting to discuss my "role in the process. It did raise concern regarding the "spirit of transparency" from Inspire District Office leadership. Similar responses were received from the Inspire District CFO when information was requested. It is noted, however, that all other members of the Inspire District Office team I met with and interviewed were very helpful, timely in their responses, and possessed a "spirit of transparency" or sharing of information.

Three separate reports identifying certificated teaching staff were provided during the review. One report was the general ledger listing payroll for certificated staff; another report was a credentialed teacher listing provided to the Personnel Lead of the DCOT identifying the school's certificated staff; and the third report was a monthly attendance report by teacher for the month of October 2019. The payroll GL listing and credentialed teacher listing were similar with approximately 215 certificated staff listed. The monthly attendance report for October 2019 included about 425 teachers. This is a difference of over 200 certificated staff between the reports. The only way to confirm accuracy of credentialed teachers teaching students would be to review all Inspire District Office supported charter schools and their ADA by teacher reports with student detail, as well as the other schools' credentialed teacher reports.

Also, per the agreement, an invoice is to be prepared between participating schools for each occurrence of transfer. As of April 6, 2020, no invoice for such payroll and staff transfers had been created or presented for review. As mentioned before, the amount of the transfers for the first half of the school year (July 2019 to December 2019) is approximately \$10.5M and includes the transfers of approximately 593 certificated and other staff.

As mentioned earlier in this summary, the Charter Impact agreement with Inspire District Office to provide accounting, budget and fiscal reporting and processing raised an additional area of concern. The scope of work between the two organizations appears to be duplicative when reviewing the responsibilities of both Charter Impact and the Inspire District Office. Included in the agreement with Inspire District Office are similar accounting, budget, fiscal reporting and processing tasks. During review of budget, 1st and 2nd interim

reporting, it was noted that Charter Impact was very present in its dealings with the school's day-to-day operations and fiscal processes and reporting. The review was unable to see evidence of such support from Inspire District Office in these areas as detailed in its agreement with the school for the same services provided by Charter Impact.

Purchasing policies and processes were reviewed as well, and found to have intriguing details related to providing instructional and enrichment funds to students/family. Instructional funds are allocated and set up for each student via the Enrichment Ordering System (EOS). Funds are accessible in the EOS system for the student/family to use in coordination with the homeschool teacher to determine the best use of instructional funds for each student's personalized learning plan. Funds are not "given" to the student or family.

A review was performed of approximately 100 students' EOS purchases noting purchases made for instructional or enrichment services. Individual student reports provided listings of each student's services acquired via the EOS system, as well as a remaining balance of funds in the student's account. Approximately \$2,600 per student is allocated to each student's EOS account for a given school year. Funds are "dropped" in the EOS account two times per school year. A list of approved vendors for acquiring services is provided to each student.

In the event a student/family requests to utilize vendor(s) not on the approved vendor list, a request for approval process is completed and reviewed with certificated staff and the Enrichment Team before allowing services to be acquired.

A challenge in the EOS system stems from items ordered via Amazon.com where the student/family receives items requested as well as the receiving documents. The purchasing/enrichment team receive an Amazon confirmation receipt, which is utilized as a receiving document item for purchasing processing. During review of EOS approved/received instructional and enrichment services there were many uncommon, from a traditional school perspective, expenditures related to enrichment services for the students. A few examples of such expenditures are: surf school sessions, guitar or voice lessons, martial arts lessons, as well as Circus Center sessions.

Per the Purchasing Director, these expenditures are considered enrichment in nature and are part of the student's individualized educational program. Per purchasing policy, before EOS funds are allowed to be utilized for special interest or extracurricular activities, students must have already purchased core subject curriculum with instructional funds or independently acquired by the parent, or a plan for all core subjects are in place.

When inquired about the appropriateness of services such as surf school via the EOS system, the Purchasing Director responded that it would be similar to a PE or sports choice at a traditional school. She commented that this particular feature of the program is what allows students to create educational plans and extra-curricular activities that are customized to their interests. Students find the feature appealing.

Oversight Checklist Risk Assessment: Low

Overall Risk Assessment: High

Recommendations

- CPA should review specific costs of the type of support they are paying for via the 15% of revenues.

- For CPA, a review of what scope of work is actually being done by Charter Impact and what is being done by Inspire District Office appears redundant. Possibly save the 3% paid to Inspire by eliminating that portion of the agreement.
- A review by the CPA to see what precisely is being provided by Inspire most likely will reveal the CPA would be more effective if they hire staff to replace much of the work that is listed in their agreements with Inspire.
- If CPA is committed to sticking with the Inspire EOS system, they could ask for a cost quote from Inspire for a subscription service fee amount per student for use of the student. At close to \$6M each being sent to Inspire by CPA and PCA, quite a bit of savings can be realized if the charter looks at bringing people in house to do specific tasks and only agree to specific deliverable work products from the support organizations.
- At some point, the Economy of Scale argument for back office support goes away when a charter grows to become a very large charter with over 2,000 ADA. That review by the charter seems necessary now.

Cabrillo Point Academy: Personnel

Context

At the site visit with Cabrillo Point Academy (CPA) there was an overall feeling of administration and teachers having great energy, strong compassion and a high level of enthusiasm for their students and staff they worked with. The honest sincerity of these people on the front lines, like the site principals and teachers interviewed, felt genuine. But during the site visit, working with HR staff (Inspire District Office) there was a concern in regards to the data collection of staffing at the site. The numbers kept changing with certificated and classified staff in all of the Oversight Checklist areas. Also, based on conversations during the site visit raised questions in regards to the exchange of information coming from the staff that were in charge of the data and the administration (site principal) who participated in answering the oversight questions. I learned that there was a recent reorganization of the charter school, its name, location, students and certificated staff. There was more concern after the conference call on March 24, 2020, regarding the MOU on “leased” teacher agreement for Inspire schools.

Concerns

- P-1 Leased teacher MOU for CPA and all Inspire charters.
- P-11 Governing Board does not approve personnel actions.
- P-12 Charter hires sufficient teaching staff: This is an unknown because the teaching staffing list kept changing.
- P-14 Appropriately credentialed staff list: 1st list – 278 employees; 2nd list – 209 employees. All teachers had valid core credentials that were reviewed from both lists. HR couldn’t explain the huge difference in staffing. This is a huge concern because CPA (Inspire) doesn’t exactly know how many teachers are at the site. There is an inaccurate count of teachers seen through the reports HR ran twice for this oversight area. Could be because of leased teachers.
- P-15 Not completed. Not all teachers at CPA hold an English Learner (EL) authorization. Principal of CPA sent out a letter to teachers to correct by 6/30/21 or no contracts will be awarded to the teacher.
- P-18 Not Completed. Six classified support staff. HR verified two staff members with appropriate transcript documentation for their positions.

Oversight Checklist Risk Assessment: Low

Overall Risk Assessment: High

Recommendations:

- Governing Board should approve personnel actions.
- Close monitoring of actual numbers of teachers and EL authorizations.

Cabrillo Point Academy: Educational Program

Context

Cabrillo Point Academy (CPA) is an independent study model attractive to homeschooled students, those seeking credit recovery, or a non-traditional school schedule. At a minimum, teachers meet face-to-face with families every 20 school days. Most teachers reportedly communicate with families on a more frequent basis via text or email. They also connect with families via Zoom, phone, and other digital platforms.

For their work at Cabrillo Point Academy, students can select from the following options to verify mastery of their completion of a standards-based education:

- standards-aligned online courses
- standards-aligned textbook materials
- online subscription package platforms
- materials with standards checklists
- high school course outlines

CPA students have the following options for instructional pathways:

Online Pathway:

Cabrillo Point Academy uses several online learning platforms to meet the learning needs of students. K12/Fuel Education is used primarily by students in grades K-8th and Odysseyware primarily grades 3rd-8th.

Edgenuity and StrongMind offer courses for students in grades 6th-12th. The online platforms are Common Core, New Generation Science Standards (NGSS), and state-standards aligned. The courses combine direct-instruction videos featuring on-screen teachers with rigorous assignments, performance tasks, and assessments to engage students and ensure subject-area mastery. When students choose this pathway, the teachers providing some of the courses for core content areas may not be Cabrillo Point Academy teachers; they are teachers in the Inspire Charter School Network not directly overseen by CPA.

Textbook Pathway:

McGraw Hill is a conventional textbook package available to students in grades TK-12th in which course readings and assignments can be completed almost completely offline. Students in high school can opt to complete their coursework in packets to efficiently interact with content with minimal distraction. When students choose this pathway, their teachers for core content areas are directly employed by CPA.

Custom-Designed Pathway:

The custom-designed curriculum is a customizable learning program that allows families to choose curriculum and classes that fit their specific needs and interests. Families who wish to design and create a custom learning plan work with their teacher and curriculum coaches to use various combinations of online and textbook material, vendor classes, and special projects and experiences aligned with Common Core state standards checklists to verify course completion.

Data

As a group, Cabrillo Point Academy students score slightly below standard in English language arts and further below standard in mathematics. Cabrillo Point performance data for the 1,933 students tested shows

students are 20.9 points below standard in English language arts, a 6 point increase from the prior year. Data show the 1,930 Cabrillo Point students tested are 76.4 points below standard in mathematics, maintaining at -1.6 points for Cabrillo Point from the prior year.

Of the 40 English learners tested, 57.6% progressed at least one level on the English Learner Performance Indicator level in one year.

Of 134 students who would have been appropriate for graduation, 86.6% graduated. This was an increase of 25.3% from the prior year.

251, or approximately 12% of the students eligible to take the CAASPP test, went through the process to officially opt out of 2019 CAASPP testing.

Demographics

Of the 4,466 students at Cabrillo Point, 54% are Caucasian, 27% are Hispanic, 3% are African American and 7% are two or more races. About 1.5% of the student population are English Learners. By comparison, in Dehesa and its charters, the total rate of English Learners is 4%. About 29% of the students are socioeconomically disadvantaged.

Teaching and Learning

Cabrillo Point shifts responsibility for some of their instructional work to vendors.

These vendors provide services such as extracurricular lessons and tutoring. Examples include martial arts lessons, a sports club, horse- back riding, math tutoring, and so on. Vendors meet with students individually or in small groups. Vendors are not required to have tuberculosis screening, although there is a background check. The onus for the child's safety and supervision when with a vendor falls on the parent. Cabrillo Point has no direct oversight with these vendors and cannot be assured students are safe and learning during this period of their program with Cabrillo Point Academy.

Teachers across the Inspire Group of Schools are shared for subject matter instruction. In this scenario, CPA cedes responsibility for instruction to an external entity, and pays them to instruct students on Cabrillo Point's behalf. A lack of direct oversight for instruction of high school- aged students may put the quality of the instructional program at risk.

Teachers of record stay with students throughout their time at Cabrillo Point Academy. The same teachers overseeing the elementary program will also oversee the high school program for students. This may present higher risk to the guidance of the high school-aged students when their primary teacher of record might not be an experienced secondary educator.

In general, there is concern around independent study and responsibility for instruction when parents instruct students with special needs (EL or SpEd). The transference of responsibility for instruction to parents is not always appropriate given the preparation of the parents for this task. Structures are in place to assist; however, supervision of this model surpasses staff's ability to monitor parents appropriately to ensure well-prepared, compliant services for these special categories of students. Some of the responsibility for English learner instruction is in the hands of parents, who themselves are often English learners.

Insufficient teacher time is dedicated to teachers assisting English learners, who receive 25-30 minutes per week of designated ELD from a credentialed teacher of the 100 or more minutes they should receive weekly.

The ELD class is delivered once per week for 25-30 minutes with the ELD teacher. If CPA were to increase this time allocation of a highly-qualified ELD teacher with English learners, it would be an acceptable model. As is currently the case, the combination of 25 minutes weekly with a teacher, instructional software and parent support combined may be insufficient to provide high quality designated English language development instruction.

Concerns

- Attendance – Reported attendance rates were extraordinarily high. An amended report was provided about which attendance rates were being claimed by the school. CPA's 9/30/19- 11/1/19 attendance statistics by teacher show 99.8% attendance rate for Cabrillo Point.
- Teachers are only required to interact with parents and students every 20 days. Although many teachers report more frequent interactions with parents, 20 days is a significant period of time between interactions with a qualified teacher. This is particularly true in cases in which the parent or student does not seek additional help and is failing to succeed.

Oversight Checklist Risk Assessment: High

Recommendations

- Develop and implement a plan and timeline for CPA to take direct responsibility for high-quality teaching via teachers who are under direct oversight of the school.
- Develop and implement a plan and timeline for CPA to ensure the safety and wellbeing of the students it serves by allocating teaching and extracurricular responsibilities to vendors other than teachers who work for Cabrillo Point Academy.
- Develop and implement a plan and timeline for CPA to be directly responsible for its own programs and services.
- Develop and implement a plan and timeline for CPA to provide a clearer understanding of their practices, thereby supporting the oversight of their authorizing district.

Cabrillo Point Academy: Special Education

Context

When a charter school is its own independent LEA member of a SELPA for special education purposes, the charter school 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. A detailed guidance document from CDE dated 2017 will provide clarification for specific elements related to IDEA and charter schools (www.cde.ca.gov/sp/se/ac/spedinchartsch.asp).

Cabrillo Point Academy (CPA), previously listed as Inspire Charter School - South, is authorized by the Dehesa School District, but deemed a local education agency for purposes of special education with the El Dorado SELPA. Detailed responsibilities of the El Dorado SELPA and Cabrillo Point are outlined in the MOU.

Data

1. Annual Performance Report California Department of Education, Special Education Division is reviewed. This report is required by Individuals with Disabilities Education Improvement Act of 2004 (IDEA) (20 U.S.C. 1416(b)(2)(C)(ii) and 34 CFR 300.602) for all local education agencies including school districts, county offices of education and charter schools. There are 17 indicators that measure data relative to the complaint implementation of federal law in multiple areas such as statewide assessment, graduation rate, discipline, least restrictive environment, disproportionality, and IEP compliance. This document will

serve as reference within the body of the report for each charter school for which Dehesa is reviewed and is available online at www.cde.ca.gov/sp/se/ds/leadatarpts.asp.

2. California School Dashboard
3. Memorandum of Understanding: Dehesa School District and Inspire Charter School South (Cabrillo Point Academy), April 2, 2018.
4. Special Education Student Information — SEIS is a web-based system that allows centralized, online access to the Individual Education Plan for all students, the management of that date, CALPADS reporting and service tracking. Its maintenance and operation are funded by the El Dorado County Charter SELPA.

State Assessment

The Annual Performance Report (2018-19) for CPA sets specific targets for the participation of students with disabilities in statewide assessment. Targets are established and monitored by CDE each year. Typically, they are one year delayed in each annual report.

CPA did not meet the targets of >95% for participation in mathematics and English language arts statewide assessments. The school was identified for Performance Indicator Review (PIR) monitoring activities, which was directed to the El Dorado SELPA for resolution. In addition, the school met the achievement target (>14%) in English language arts but not in math>12.6%. The math achievement rate was 4.97. It is difficult for many districts in California to meet this math achievement rate for students with disabilities. These are not risk areas for Dehesa and no other action is needed.

Curriculum

Curriculum is aligned and integrated with the IEP for students with disabilities on an individual basis. At initial placement the IEP is reviewed with the parent and reviewed within 30 days to determine if placement is appropriate. Most of the special education population is in the mild/moderate range.

Disproportionality

The school does not enroll a smaller number of students with disabilities disproportionately based on data provided through CALPADS. The identification rate 11.6% for special education was determined using the CALPADS enrollment (4,159) and SEIS (452) (it does not include pending for 35 additional students). This percentage is consistent with the statewide identification rate. This is not a risk area for Dehesa.

Policies and Procedures

The El Dorado County SELPA provides a comprehensive procedural manual for special education. Additional training and ongoing support are available to the school from the SELPA. The SELPA provides ongoing support to the charter schools in all areas of procedural support for special education.

Timelines/Compliance

The most current MOU between CPA and Dehesa School District was dated June 28, 2016. On April 2, 2018, Inspire Charter School South (Cabrillo Point Academy) approved an MOU for membership in the El Dorado SELPA. Important distinctions in roles and responsibilities are outlined in the MOU and between Inspire Charter School South (Cabrillo Point Academy) and the El Dorado SELPA. It emphasizes that the charter school is solely responsible for the provision of special education programs and services to eligible students enrolled in the LEA (Section 1.9). The specific focus on this responsibility is:

- The LEA is responsible for the operation of any direct educational program services
- The LEA has the duty and authority to provide Free and Appropriate Public Education (FAPE) to individual students enrolled in the school

- The SELPA has no duty or authority to make decisions regarding the educational programming of students enrolled in the LEA.

This language may be helpful to the Dehesa district in the oversight process.

Staffing

Special education staffing was verified by teacher and program specialists credentials from the human resources department. The staff is fully certified with both mild/moderate and moderate/severe disability areas, as well as general education certification.

The format for instruction is primarily independent study, but for special education students the format and level of instruction is designed around the IEP for each student. All students have equal access to the standard-aligned courses and receive instruction from both general and special education teachers.

This is not a risk area for the district.

Suspension

The Annual Performance Report indicates that Cabrillo Point has met the targets for discipline—they are far below the target level of <2.76% in suspensions.

This is not a risk area for the district.

Student Records

Student records are stored in a confidential and secure location under staff direction. All IEPs are maintained with the SEIS system and accurately reflect the entire population of special education students included in the combination of schools that occurred in the fall. Access to the SEIS uses confidential identification and passwords assigned by the El Dorado SELPA. All teachers have access to the records for students with disabilities through SEIS.

This is not a risk area for Dehesa.

Oversight Checklist Risk Assessment: Low

Cabrillo Point Academy: Facilities/Operations

Inspire Charter School – South was named Cabrillo Point Academy (CPA) as a result of the restructuring last year.

Concerns

- CPA was led by Inspire attorneys to believe operations oversight is only for classrooms with students, resulting in many blank evidence tabs.
- The insurance document CPA resubmitted including Dehesa School District, dated March 26, 2020, covers Inspire Charter School – South.
- CPA doesn't acknowledge sites for student testing should be considered as facilities.
- Oversight Checklist Risk Assessment: High Recommendation
- If the recommendations of the Governance and Finance/Business portions of this report are implemented, Facilities/Operations concerns would improve greatly.



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

Superintendent Johnson and Dehesa School Board,

We wanted to take a moment to thank the Dehesa School District as well as the oversight team for providing Cabrillo Point Academy with the invaluable feedback that has been shared. The knowledge gained through each visit has helped us to take a closer look at many of our practices and processes. We have learned so much from the experience and expertise that each member of the oversight team shared with us. This process, although not always easy, has confirmed all of the amazing things our staff and teachers do on a daily basis to serve our students and families. We have also seen the areas where we can improve, and we value that feedback just as much. It is only in seeing and accepting our shortcomings that we can truly improve and become a better school. It has been a pleasure working on this oversight process with you all.

General Response

You will notice that Provenance, Inspire Charter Schools, Inspire District Office, and Inspire are all used interchangeably by the oversight team in this report. The “Inspire” name has been used in several different organizational structures, which admittedly creates confusion. Our staff, families, and students have always identified with the “Inspire” name. Since its inception, Inspire had been operating as a network of schools. Inspire spanned across the state of California, and so many students found their home within the Inspire family. As internal structures began to change, these changes weren’t always advertised or communicated with the outside public. For this reason, many people still identify with the Inspire brand, even though they have been officially enrolled in Cabrillo Point Academy, or any other network school, for several years. It was only until the 2019-2020 school year that, as a collective, each school within the network



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

started to refer to their official school name. It is easy to understand why some people still use the Inspire name, even when they are referring to Cabrillo Point Academy.

Inspire Charter Schools began in 2014 as one non-profit organization and, over the next few years, grew to have multiple schools under one umbrella charter management organization. Prior to July 1, 2017, Inspire Charter Schools was both the parent company and the operator of Inspire schools. However, there have been major changes to the governance and management structures of the schools that were once under the initial charter management organization.

During the 2017-2018 school year, Inspire Charter Schools worked with the Blank Rome legal team to restructure the organization to have individual charter school boards that had Inspire Charter Schools as the Sole Member Entity. At that time, all board agenda items were approved by both the charter boards and also Inspire Charter Schools board. Also, in the 2017-2018 school year, another non-profit organization was incorporated and registered with the Secretary of State called Inspire District Office, later renamed to Provenance in 2018. Provenance has a registered DBA called Inspire Charter Services. Provenance, Inspire District Office, and Inspire Charter Services refer to one organization. Provenance (formerly Inspire District Office DBA Inspire Charter Services) and Inspire Charter Schools are two separate non-profit benefit corporations.

In the 2017-2018 school year, Inspire District Office/Provenance did not provide any support services. It was in its initial phase of existence. The Provenance organization was created to perform educational services as a vendor through a fee for service contract with each school. Provenance became the support provider for the 2018-2019 school year after both Provenance and the independent Charter School Boards



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

approved the Services Agreement. Provenance continued as a support provider for the 2019-2020 school year after both Provenance and the independent Charter School Boards approved the Services Agreement.

Once the schools each had their own school boards, the purpose of the Inspire Charter Schools organization was to appoint new board members. However, in July 2019, each individual school board under Inspire Charter Schools voted to remove the sole member entity thus making Inspire Charter Schools non-operational. As of July 2019, each school has self-appointing boards. Provenance (formerly Inspire District Office DBA Inspire Charter Services) continues to exist as a separate non-profit benefit corporation that provides educational support services to charter schools through a fee for service contract, but does not operate or manage any schools.

We would like to point out that many of the references in this report no longer represent how the organization operates. This report discusses events prior to Cabrillo Point Academy's inception through April 2020. There have been significant changes not only in the current school year but also since April 2020. We believe that going through the oversight process next year, when the oversight team can focus directly on our current practices and not past practices, Dehesa will see significant decreases to the risk levels of our school.

Throughout this oversight report you will notice a common thread mentioning Provenance's "control" over Cabrillo Point Academy. Although many of our processes have been intertwined with Provenance and Inspire Charter Schools for years through staff, leadership, and policies, Cabrillo Point Academy and its board have worked tirelessly over the past year to sever as many ties with Provenance as possible.



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

When Inspire Charter Schools closed and Cabrillo Point Academy became its own independent corporation, Cabrillo Point Academy did not have the capacity to run all of the departments itself. Cabrillo Point Academy was basically a school solely composed of teachers, and Provenance was the support organization with all departmental classified staff. Our goal is to become self-sustaining this year. Already we have initiated a brand new contract with Provenance, reducing our fees from 11% to 3.35%. We have brought governance, technology, procurement, accounts payable, human resources, enrollment, records, school accountability, testing, and CALPADS into our school instead of contracting those services with Provenance. They are a working back office that employed many of the classified staff to facilitate school operations. However, board decisions are not controlled by Provenance and our school leadership is not influenced by Provenance. If they were currently operating as a management organization, Cabrillo Point Academy would not be able to negotiate a reduced rate and wind down plan. This proves that they are not making the decisions for the school, that our board and leadership does have the capacity to stand individually, and that the school leadership and board are working in the best interest of not only our students, staff, but also public policy.

Cabrillo Point Academy will contract with Provenance for one additional year to ensure transparency and accountability with the FCMAT audit. However, this is only a one year contract and we have engaged with them in a one year wind down transition plan that will terminate at the end of the 2020-2021 school year.

The suggestion of requesting a formal revision was mentioned in the oversight checklist. Cabrillo Point Academy is dedicated to working with the Dehesa School District to revise charter petitions or MOU agreements as requested.



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

There are significant changes that have taken place since the conclusion of this oversight process, all leading in the further direction of independence and local control over all aspects of Cabrillo Point Academy.

Governance Response

Cabrillo Point Academy recognizes that one of our biggest areas of improvement is the lack of detail in our board minutes. After this oversight report was presented to us, we have researched the Dehesa board minutes and, moving forward, we will mimic the detail presented in those minutes. The lack of detailed board minutes led to the oversight team making assumptions that there were no conversations and no action taken by the board. Many of the areas of concern were not directly observed by the oversight team. However, the existing board minutes did not contain the detail necessary to support the fact that discussions did take place surrounding the shared employee MOU process, the criteria for selecting a new board member, as well as short term borrowing. All of these discussions took place over several board meetings, but the lack of detailed notes does not show the board's discussion or understanding of these topics.

For example, the oversight committee made comments in checklist stating *"the board did limited outreach and appeared to have no criteria for selection, and no overall goals for board composition, including needed areas of expertise"* When looking at our previous board minutes, it is observed that the discussion of future board members appears on the agenda. The Cabrillo Point Academy board discussed this item on 8/21/2019 and 9/3/2019 and there was an honest effort by the current board to address goals and expertise. However, our board meeting minutes lacked the details on these discussions. The conclusion that the oversight team came to was that these conversations did not happen when in fact they did happen.



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

An additional concern was that *“the Board remains heavily influenced by Provenance.”* For the last year Provenance has not had any influence over the board. The board works with the school’s leadership. Since the oversight team concluded their visit, the Cabrillo Point Academy team has made even more improvements in the area of governance. Cabrillo Point Academy has hired an assistant director who will completely oversee the governance process, independent from Provenance. The board will only interact with this individual, and will no longer be in contact with Provenance staff.

There was a concern that the Cabrillo Point Academy board was not looking to replace expensive contracts or get alternate bids for back office providers. Due to the pending FCMAT audit, the board is not currently exploring possible alternatives to the Charter Impact contract in order to ensure full transparency, accuracy, and access to data for the FCMAT team. However, the board is looking to limit expensive Provenance services by bringing many services previously provided by Provenance internally. The report states *“The structure makes it difficult for the board to govern based on school outcomes.”* and *“The significant role of Provenance in school operations and its influence over governance, combined with Provenance’s lack of transparency, undermines public policy goals.”* Cabrillo Point Academy acknowledges that expensive contracts need to be reduced, staff needs to be internal, and we are committed to ensuring that this takes place so that the board can govern over not only the instructional staff but all staff that serve our school and families. We are committed to bringing these departments internal so that there is more transparency and our school meets all public policy goals.

The last concern we would like to address is that the oversight team noted the Cabrillo Point Academy board is inexperienced. The Cabrillo Point Academy board was trained



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

on the Brown Act, Fiscal Policies, School Finance, and Charter School Legislation on September 21, 2019. These training sessions were presented by both financial experts and legal experts. However, the board might be interested in a more comprehensive training plan. Cabrillo Point Academy will be exploring outside contractors to perform further training and development. Once the board decides on a comprehensive training plan, Cabrillo Point Academy will disclose the approved contract and timeline to Dehesa. Although they had little board experience before joining our board, they are a group of very intelligent, committed individuals with varying backgrounds. They spend countless hours reviewing policies, financials, and legal documents pertaining to the running of our school. They are always asking how they can learn more and become better in their involvement. They are taking bold steps to ensure the independence of Cabrillo Point Academy.

Business/Finance Response

Much of the Business and Finance report addresses previous practices and there has been a concerted effort to change those practices throughout the course of this school year. The most notable changes in Cabrillo Point Academy finances is as of April 1, 2020, Cabrillo Point Academy engaged with Charter Impact so they can work with them directly. This change has had several practical implications that have completely removed Provenance from all financials. Cabrillo Point Academy leadership meets several times a week with the Charter Impact team so that Cabrillo Point Academy leadership can monitor the school's financial health and make informed decisions about cash flow, budget, and much more.

Cabrillo Point Academy recently opened a new bank account that removed all access to Provenance and has completely stopped the use of the Master Credit Agreement. Once again the notes are sparse in the boards meeting so the team is of the conclusion that



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

the board is unaware of these transactions. However, the master credit agreement and the amount owed to and from each school has been clearly documented and has been a part of several board meeting discussions. These financials have been part of the board financial packets and presentations. Cabrillo Point Academy is taking steps to ensure the documentation and transparency of these previous practices.

There is a recommendation to Cabrillo Point Academy to review the “scope of work is actually being done by Charter Impact and what is being done by Provenance appears redundant. Possibly save the 3% paid to Inspire by eliminating that portion of the agreement.” The previous contract with Provenance listed all services Charter Impact provides to Cabrillo Point Academy in their contract. The oversight team indicated that we were being double charged for these services. However, this is a misunderstanding. In the initial 2019-2020 services agreement with Provenance and the school, Charter Impact’s 1.75% fee was included in the 15% fee charged by Provenance. At the time, Charter Impact was a subcontractor of Provenance. We have since removed that language from the Provenance contract, and we now contract directly with Charter Impact.

In regards to our vendors, all vendors must fill out an application and go through a defined process in order to be an approved vendor. In the past, all vendors were required to complete a DOJ clearance. No Cabrillo Point Academy student is allowed to utilize services from a non-approved vendor, and each service request is reviewed by credentialed teachers to ensure that the request meets the needs of the student’s educational plan.

The oversight team suggested that *“Cabrillo Point Academy should review specific costs of the type of support they are paying for via the 15% of revenues.”* We have



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

spent a significant amount of time reviewing our current contract with Provenance and negotiated a new contract. The new rate is 3.35% and a clear, concise, and greatly reduced list of services is included.

The oversight team noted *“quite a bit of savings can be realized if the charter looks at bringing people in house to do specific tasks and only agree to specific deliverable work products from the support organizations”* and *“At some point, the economy of scale argument for back office support goes away when a charter grows to become a very large charter with over 2,000 ADA. That review by the charter seems necessary now.”* Cabrillo Point Academy completely agrees, and that is exactly what we will be doing for the 2020-2021 school year. We have hired over 50 new staff members in order to replace the existing services previously provided by Provenance. We will be bringing the following departments directly into the school: enrollment, procurement, records, testing and assessment, CALPADS, human resources, school accountability, high school support, and technology. We will continue to limit our services with Provenance throughout the year and plan to move the rest of our operations internally for the 2021-2022 school year.

One of the most valuable aspects that a contract with Provenance provides is access to several operational systems for procurement, field trips, curriculum, and vendor documentation. The oversight committee noted, *“If Cabrillo Point Academy is committed to sticking with the Inspire EOS system, they could ask for a cost quote from Inspire for a subscription service fee amount per student for use of the student.”* There are several systems that are provided by Provenance that our families utilize. Each one we would need to contract separately. However, we are looking to contract with another

procurement system which will be ready for rollover mid-year in the 2020-2021 school year. In the 2021-2022 school year, we will no longer be contracting with Provenance,



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

and we have a wind down transition plan that will include the use of a separate procurement system.

Personnel Responses

Prior to the beginning of this school year, Cabrillo Point Academy was housing many teachers from across the network of Inspire schools. Inspire started as a charter management organization called Inspire Charter Schools with shared staff working for one non-profit serving multiple schools. Given that each school in the former Inspire network shifted abruptly to operating independently in the 2019-2020 school year, the Leased Teacher MOU agreement was a solution proposed by our legal counsel and presented to the Cabrillo Point Academy board to account for staff members who served students in multiple schools given the new governance structure. The board approved the first version of the MOU on October 22, 2019. The goal is to align staff to a single school in the 2020-2021 school year, but this could not be fully implemented and implemented in the 2019-2020 school year without major disruption to students.

The oversight committee made the following recommendation regarding personnel: The Governing Board should approve personnel actions. Although this is not required at this time by charter law, the school recognizes that this is a best practice. The 2020-2021 budget being presented to our board includes position control. Cabrillo Point Academy will have internal human resources functions in the 2020-2021 school year to consistently monitor credentials, TB clearance, EL certification, and staff compliance. Incidence of leased homeschool teachers will be eliminated in the 2020-2021 school year.

Educational Program Response



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

Cabrillo Point Academy prides itself on offering students a multitude of educational choices, focused on rigor, flexibility, and individualization. We were so happy to share all of the unique and program specific aspects of our school with the oversight team. We received immensely positive feedback and we will continue striving for educational excellence. We did, however, want to address the concerns brought forward in the report in the areas of shared high school staff and servicing EL students.

English Learner development is an area that Cabrillo Point Academy is working to improve for the next school year. We have hired a director who will oversee the EL department. They will ensure that adequate funds have been allocated to improving our EL program, which will be tracked in our LCAP. Our number of EL classes and EL offerings will be increased, ensuring that students receive the 30 minutes of EL instruction they need each day. Being an independent study school, many of our offerings are provided through instructional software, however, we will be creating more opportunities for our EL students to interact face to face next year.

The oversight team indicated that when students choose an online pathway, the teachers providing some of the courses for core content areas may not be Cabrillo Point Academy teachers but instead are in the Inspire Charter School Network not directly overseen by Cabrillo Point Academy. No teachers are employed by Inspire Charter Schools Network as no such entity exists. Some teachers may be employed by one charter and servicing students in CPA through Leased Teacher MOU.

Content area teachers (HQTs) are either employed by Cabrillo Point Academy or they are leased to Cabrillo Point Academy by another school. Cabrillo Point Academy supervises the Leased Employees' activities to ensure they are meeting their performance obligations and provide input for their annual evaluations. These teachers



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

are employees of Cabrillo Point Academy while they are serving Cabrillo Point Academy students.

The credentialed teacher is responsible for designing the student's educational plan and monitoring the student's progress. Any services performed by vendors are approved by the student's teacher.

Content area teachers are in addition to the student's homeschool teacher (or homeroom teacher). The homeschool teacher's responsibility is to ensure student progress is being made in all subject areas.

The homeschool teacher (homeroom) teacher remains the teacher of record and ensures students receive their assignments, grades, and make progress with their academic work. In addition, all high school students have access to highly qualified single-subject credentialed teachers who are experts in their content area. Students have access to highly qualified single-subject credentialed teachers in math, English, science, history, Spanish, French, and art.

Special Education Response

We would like to thank the oversight committee for examining the work we do to serve students with special education needs. We are very proud of our innovative, customized, and thorough program. Our staff will strive to implement strategies geared toward increasing participation and performance on state assessments of students with unique needs. We will continue to work with our SELPA to maintain our high quality of service and keep our risk level low to the district.

Facilities/Operations



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

The oversight team has expressed concern with the lack of documentation that was provided regarding facilities. As a non-classroom-based school with no resource centers, Cabrillo Point does not have facilities where staff or students report. We rent facilities once a year to meet the state testing requirement. Teacher-Parent-Student meetings occur at a mutually-agreed upon location such as a library, coffee shop, or the family home, and the parent accompanies and supervises the student when Teacher-Parent-Student meetings occur.

However, the oversight checklist asked for inspection reports certifying facilities are free from mold and hazardous substances, facilities meet ADA requirements, facility restrooms are designated as all-gender, facilities have an asbestos management plan, a certificate of occupancy, and safety inspection. Our legal counsel indicated as a non-classroom-based school without resource centers, these checklist items would be considered not applicable. When we met with the acting superintendent and Dehesa's legal counsel in September 2019 at the start of the oversight process, they indicated that some of the checklist items would not be applicable to our non-classroom-based school model. Next year, Cabrillo will submit all testing location contracts to the oversight team. However, due to COVID-19, no testing locations were used during the 2019-2020 school year.

The charter petition approved by Dehesa School Board on December 13, 2018 includes a resource center in Laguna Niguel. However, this center was closed due to the recent legislative changes, and proof of closure was provided to the oversight committee.

Again, we would like to thank the Dehesa School District as well as the SSDA oversight team for taking the time to partner with us and help us improve. We especially want to thank Superintendent Johnson for supporting Cabrillo Point Academy as we move



CABRILLO POINT ACADEMY

13915 Danielson St #200, Poway, CA 92064
Phone (619) 404-3190 * Fax (619) 749-1792

toward independence and quality. Cabrillo Point has a clear path for improvement and we are looking forward to the continued partnership with Dehesa.

A handwritten signature in black ink that reads "Jenna Lorge". The signature is fluid and cursive, with the first letter of each name being significantly larger and more decorative.

Jenna Lorge

Senior Director/Principal

Inspire Charter Schools

Cabrillo Point Academy: Governance

BINDER 3: GOVERNANCE DOCUMENTATION CABRILLO POINT ACADEMY (INSPIRE) (Note: documents not provided in single numbered governance binder)			
Tab	Description	Compliance Area(s)	Provided?
1.	Articles of Incorporation	G1	Y (2017)
2.	Bylaws	G1-G4, G6, G12	Y (2019)
3.	Approved Charter	G3, G6, G8, G12	Y
4.	Most Recent School Leader Evaluation	G5	N (scheduled 5/19/2020)
5.	List of Board Members	G7-G8	Y
6.	Board Member Biographies	G9-G11	Y
7.	Description of School and Community Demographics	G9	Y
8.	Completed Form 700s for Board Members and Leadership	G11	Y
9.	Annual Board Meeting Calendar	G12	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Tab	Description	Compliance Area(s)	Provided?
10.	Sign-in Sheet(s) from Brown Act Training	G13	Y (letter)
11.	Three Most Recent Board Meeting Agendas	G14-G15	Y
12.	Screenshot of Website with Posted Agenda	G14	Y
13.	Public Comment Description/Policy	G15	Y
14.	Three Most Recent Board Meeting Minutes	G16	Y
15.	Screenshot of Website with Posted Minutes	G16	Y
16.	Board Meeting Minutes Reflecting Review of Compliance with Education Code Section 49431.9 (Prohibiting Food/Beverage Advertisements)	G17	N/A (no food program)
17.	Parent Handbook	G18	Y
18.	Student Handbook	G18	Y
19.	Employee Handbook	G18	Y
20.	Complete Set of Board Policies	G19-G30, G39	Y
21.	Memorandum of Understanding	G38	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff: Gail Greely
 Position of Assigned Staff Person: SSDA DCOT

CABRILLO POINT ACADEMY GOVERNANCE OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Organizational Management</u>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<input type="checkbox"/> Articles of Incorporation (Binder 3, Tab 1) <input type="checkbox"/> Bylaws (Binder 3, Tab 2)	X		Corporate name change not submitted to state until April 2020
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	Bylaws were revised in July 2019 but remain inconsistent with current law applicable to charter schools (e.g., action without meetings and interested persons as directors).
G3	Any changes to charter or bylaws have been approved by charter school's governing board and submitted to the authorizer.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)		X	Authorizer was not informed of changes to governance structure made through amended bylaws.
G4	There is a clear distinction between responsibilities of governing board and administration.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	Despite elimination of sole statutory member, Provenance (renamed from IDO) continues to strongly influence decision-making. Shared senior staff and contracts for services and staff diminish role of board, and its ability to hold leadership accountable for school outcomes.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G5	Governing board has a robust process for evaluating the charter school leader.	<input type="checkbox"/> Most recent charter school leader evaluation (Binder 3, Tab 4)		X	No evidence of governing board evaluation of school leadership at any level. Although org chart in charter shows board above the Executive Director, Deputy Executive Director and Regional Director, these positions are shared with other schools. Unclear if board has any role in selection and evaluation of these school leaders.
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3) <input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q2) <input type="checkbox"/> Teacher interview (Binder 1, Tab 4, Q1)	X		Charter says that one board of director position will be reserved for parent or community member, but no process is specified. No indication which of the board members (all new) were chosen for that slot. Charter calls for Parent Teacher Organization as part of parent teacher participation in governance, but no PTOs operating since closure of "Enrichment Academies".
Composition					
G7	Charter school has a list or roster of governing board members.	<input type="checkbox"/> List of board members (Binder 3, Tab 5)	X		
G8	Composition of governing board is consistent with approved charter.	<input type="checkbox"/> List of board members (Binder 3, Tab 5) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)		X	All board members elected in second half of 2019; change from sole statutory member ICS appointment of board; charter says one board position reserved for parent or community member. Minutes include no discussion of parent rep, criteria or process for finding members.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G9	Governing board is diverse and reflects charter school and community population.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Description of school and community demographics (Binder 3, Tab 7)		X	School is about 50% white; 25% Hispanic -board appears to have no Hispanic members; process for electing board did not involve community outreach for diversity
G10	Governing board members have experience in key areas, such as education, finance, legal, real estate, and fundraising.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6)		X	All have experience as home school parents, but no educational administration, finance, legal or real estate experience.
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Completed Form 700s (Binder 3, Tab 8)	X		Unknown as to related entities Inspire Charter Schools and Provenance.
Meetings					
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.	<input type="checkbox"/> Annual governing board meeting calendar (Binder 3, Tab 9) <input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)	X		Meetings are scheduled monthly; multiple short meetings in second half of 2019 evidence of lack of plan for governance transition.
G13	Governing board members receive annual training regarding Brown Act requirements.	<input type="checkbox"/> Sign-in sheet from Brown Act training (Binder 3, Tab 10)		X	Brown Act training received in 2019; no documentation to establish whether annual. Charter commits to initial training and training for new members – not annual.
G14	Meetings are noticed in accordance with the Brown Act.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 12)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G15	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Public comment policy (Binder 3, Tab 13)		X	Policy stated on published agenda does not include additional time for non-English speakers.
G16	Minutes are approved and thereafter made available to the public.	<input type="checkbox"/> Sample meeting minutes (Binder 3, Tab 14) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 15)	X		Minutes are extremely sparse, even on major items – reflecting either a lack of questioning and discussion by the board members or failure to follow best practice in documenting that the board deliberated carefully before taking the vote.
G17	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	<input type="checkbox"/> Board meeting minutes (Binder 3, Tab 16)			N/A
Board Policies					
G18	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<input type="checkbox"/> Parent handbook (Binder 3, Tab 17) <input type="checkbox"/> Student handbook (Binder 3, Tab 18) <input type="checkbox"/> Employee handbook (Binder 3, Tab 19)	X		
G19	Governing board has adopted policies related to conflict of interest.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G20	Governing board has adopted policies related to student discipline and due process.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G21	Governing board has adopted policies related to complaints and investigations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G22	Governing board has adopted internal control policies (and related forms and systems).	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G23	Governing board has adopted policies related to bank signature authorizations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G24	Governing board has adopted policies related to allowable purchases and purchasing authority.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G25	Governing board has adopted policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G26	Governing board has adopted policies related to employee harassment.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G27	Governing board has adopted and annually updates its safety plan to include all legal requirements applicable to charter schools.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G28	Governing board has adopted policies related to immunization records.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)		X	Enrollment process requires immunization record, but unable to locate specific immunization policy. Charter says school is “waiting for the California Department of Education to release clarification and guidelines on how non-classroom based schools should apply SB277” .
G29	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G30	Governing board has adopted policies related to Section 504/IDEA compliance.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
Education Code Assurances					
G31	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q3)			
G32	Charter school has complied with assurance that it shall not charge tuition.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q4)			
G33	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q5)			

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G34	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).	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q6)			
G35	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q7)			
G36	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q8)			

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G37	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	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q9)			
<u>Memorandum of Understanding</u>					
G38	Charter school has complied with terms of current memorandum of understanding, if applicable.	<input type="checkbox"/> Memorandum of understanding (Binder 3, Tab 21)		X	MOU does not include a specific provision regarding material revision of the charter, but change in school name and change in governance would qualify under SBE definition.
<u>Complaint Policies & Procedures</u>					
G39	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom.	<input type="checkbox"/> Board policies (Binder 3, Tab 20) <input type="checkbox"/> Observation of classrooms (Binder 1, Tab 10, Q5)			
G40	Complaint policies and procedures are available in the main/front office.	<input type="checkbox"/> Observation of main office (Binder 1, Tab 11, Q1)			
Total "No" Responses: <u>11</u>					
Risk Assessment: 0-10 Low 11-20 Moderate 21+ High					

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff Person: Tom Krzmarzick
 Position of Assigned Staff Person: Finance/Business Lead

CABRILLO POINT ACADEMY FINANCE/BUSINESS OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Budget, Accounting, and Financial Reporting</u>					
F1	Governing board policies address budget, accounting, and financial reporting.	<input type="checkbox"/> Board policies (Binder 6, Tab 1)	√	<input type="checkbox"/>	<p>Board Policies provided via Binder 6 (Finance & Business) component of DCOT review process. The Policies provided seem reasonable for business/finance operations. However, after interviews, research, analysis of various financial reports, it is apparent the Board is unaware of many major financial decisions and transfers related to the operation of the charter school. Big question regarding relationship with Inspire District Office and its influence in fiscal decisions of the charter school.</p> <p>Examples of major decisions the Board is apparently unaware of: Leased Teacher MOU payroll transfers over \$10.5M during the period of July 2019 thru December 2019. Due to/From Intercompany Transfers between other Inspire District Office supported charter schools of approx. \$6.9M. The significant fiscal events described above appear to be evidence the Board lacks capacity to oversee financial resources of the charter.</p>
F2	Current budget has been approved by the governing board.	<input type="checkbox"/> Current/adopted budget (Binder 6, Tab 2) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 3)	√	<input type="checkbox"/>	<p>Board approved at June 2019 Meeting 2nd Interim recently approved. Budget format via state SACS reporting Fiscal presentations provided by Charter Impact staff to Board during meetings Board unaware of Payroll Transfers back and forth between IDO supported charter schools Huge ADA swings</p>

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
					(1,118 ADA increase or 33.6%) from Adopted Budget to 1st Interim Budget with lack of review. Interfund or Intercompany transfers between IDO supported charters not approved by Board
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.	<input type="checkbox"/> Board meeting minutes (Binder 6, Tab 4) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Budget reviewed by Board during appropriate timeline for approvals. Narrative on budget provided and presented by Charter Impact staff appeared to be a lack of fiscal working knowledge of Board and Principal i.e. Typically Board Resolution provided for Intercompany (fund) transfers. No Board approval of Due to/From Intercompany IDO transfers (\$6.9M). Huge ADA swings from Adopted budget to 1st Interim with limited rationale Noted during review the Board did NOT approve 2018-19 Unaudited Actuals. Charter did submit 2018-19 Unaudited Actuals report to district. No evidence in Board Meeting Agendas or minutes the Board approved the 2018-19 Unaudited Actuals Report
F4	Budget aligns with charter school's current LCAP or update to LCAP.	<input type="checkbox"/> Current budget (Binder 6, Tab 2) <input type="checkbox"/> LCAP/LCAP update (Binder 6, Tab 4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	For the budget provided, aligned with LCAP Calculations of Instructional related expenditures provided
F5	Budget provides for all financial obligations.	<input type="checkbox"/> Current budget (Binder 6, Tab 2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Budget and budget updates provides latest projections and current fiscal status Budget, Interim Reports provided via SACS format MYP provided at each required reporting period (Budget, 1st/2nd Interim) Financial Obligation detail provided via state account code structure. Due to/from Transfer budget and process needs more transparency Significant Payroll Transfers throughout the year needs more transparency Leased Teacher MOU Agreement and related payroll transfers

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
					create possibility for unknown obligations due to the agreement with all 14 Inspire District Office supported charter schools.
F6	Governing board approves all required financial reports.	<input type="checkbox"/> Required financial reports (Binder 6, Tab 5) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 6)	<input type="checkbox"/>	√	Meeting minutes provided evidence of approval of required financial reports except for the FY 2018-19 Unaudited Actuals Report. No evidence Board approved 2019-20 UAs
F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 7)	√	<input type="checkbox"/>	Budget approved by Board during June 2019 meeting Estimated actuals included in reporting
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 8)	√	<input type="checkbox"/>	Received by authorizing district
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 9)	√	<input type="checkbox"/>	Received by authorizing district
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 10)	√	√	E-mail from Clara Yi of Charter Impact to district. District received copy of Unaudited Actuals Report. No record of approval by Board
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	Evidence of maintaining separate restricted accounts noted in all fiscal reports, budget projections reviewed
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	Cash flow projections are regularly prepared at Budget, and Interim Reporting Periods.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F13	Charter school's business accounting system complies with state accounting and reporting requirements.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q4)	√	<input type="checkbox"/>	Accounting/Financial reports comply with state accounting reporting as well as system requirements, SACS
<u>Audit</u>					
F14	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.	<input type="checkbox"/> Proof of submission of auditor certification and contract (Binder 6, Tab 11) <input type="checkbox"/> Director of finance (or equivalent) interview ((Binder 1, Tab 2, Q5)	√	<input type="checkbox"/>	Report was provided to Authorizer, late submittal to state due to name change No Deficiencies reported from Auditor Wilkinson/Hadley Audit Firm
F15	Charter school has developed auditing schedule/timeline.	<input type="checkbox"/> Auditing schedule/timeline (Binder 6, Tab 12)	√	<input type="checkbox"/>	Provided in Binder 6 documents
F16	Charter school has submitted prior year's financial audit to authorizer.	<input type="checkbox"/> Previous year's audit (Binder 6, Tab 13) <input type="checkbox"/> Proof of submission (Binder 6, Tab 14)	√	<input type="checkbox"/>	E-mail from Auditor to DO. Audit results received during interview meetings
F17	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	<input type="checkbox"/> Corrective plan of action (Binder 6, Tab 15) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q6)	√	<input type="checkbox"/>	No deficiencies reported from Auditor. N/A
<u>Financial Condition</u>					
F18	Charter school maintains an appropriate level of reserves for economic uncertainties.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q7)	√	<input type="checkbox"/>	Minimum reserve levels of 3% Charter projecting Ending Balance of 4% to projected revenues at 2nd Interim

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F19	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input checked="" type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q8)	√	<input type="checkbox"/>	Financial projections at each required reporting period (Budget, 1st/2nd Interim) always includes 3 year financial projections. Long-term debt obligations included in projections
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.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input checked="" type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q9)	√	<input type="checkbox"/>	Current projections indicate charter school will be able to meet its financial obligations and retain appropriate level of reserves for current and 2 future years
<u>Cash Receipts</u>					
F21	Charter school has policies addressing cash receipts.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16)	√	<input type="checkbox"/>	Documents included in Binder 6 (Business/ Finance). Sufficient evidence thru samples given
F22	Charter school maintains records of all monies received (e.g., issues receipts).	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash receipts (Binder 6, Tab 17) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q10)	√	<input type="checkbox"/>	Copies of sample records and discussion during interview provided sufficient evidence charter maintains records of all monies received
F23	Charter school deposits monies in a timely manner.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q11)	√	<input type="checkbox"/>	Deposit statements provided evidence of sufficient timely process
F24	Charter school maintains records of deposits of all monies.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash deposits (Binder 6, Tab 18)	√	<input type="checkbox"/>	Docs provided at interview/review meeting. All IDO Charters use Citizens Bank. Recently, charter has begun process to change bank to Wells Fargo Bank

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F25	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q12) <input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q13)	√	<input type="checkbox"/>	
<u>Disbursements</u>					
F26	Charter school has policies addressing disbursements.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19)	√	<input type="checkbox"/>	Documents reviewed during interviews, meetings. Evidence provided sufficient assurance of process
F27	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.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q14)	√	√	Disbursement policy included in Binder 6 (Business/Finance)
F28	Checks are signed by authorized employees.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q15)	√	<input type="checkbox"/>	Provided Purchasing and Bank Policy Due to the nature of the Charters Purchasing, or EOS System, for student/family instruction and enrichment purchases, physical receipt is not received. Inspire DO receives copy of Amazon electronic order confirmation
F29	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q16)	√	<input type="checkbox"/>	Signed by authorized employees approved by Board at beginning of school year

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F30	Charter school has segregated duties between purchasing, receiving, and accounts payable.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q17)	√	<input type="checkbox"/>	Evidence provided during interviews, meetings, document review demonstrates segregated duties
<u>Payroll</u>					
F31	Staff Org Chart	<input type="checkbox"/>	√	√	Included in Binder 6. Vague, no reporting relationship above Principal. Inspire's DO Org chart raised questions re: true relationship between school and Inspire DO
F32	Charter school has a salary schedule or other satisfactory salary structure.	<input type="checkbox"/> Salary schedule (Binder 6, Tab 21)	√	<input type="checkbox"/>	Included in documents submitted. Limited Steps
F33	Tax deposits are completed in a timely manner.	<input type="checkbox"/> Proof of tax deposits (Binder 6, Tab 22) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q18)	√	<input type="checkbox"/>	June 28, 2019 Stmt City Nat'l Bank and other statements provided. Samples provided as well as discussion during interview note deposits completed in timely manner
F34	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	<input type="checkbox"/> Proof of recording of earnings (Binder 6, Tab 23) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q19)	√	<input type="checkbox"/>	Evidence of properly recorded STRS earning demonstrated via samples provided Charter School earnings reports demonstrated evidence of properly recorded earnings
F35	Charter school has system to provide STRS data to authorizer.	<input type="checkbox"/> Proof of submission of STRS data (Binder 6, Tab 24) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q20)	√	<input type="checkbox"/>	April 2019 Submission Report from SDCOE included in Binder 6 (Business & Finance)
F36	Charter school has system to maintain employee earning records for preparation of	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q21)	√	<input type="checkbox"/>	Sample earning records demonstrate capable system of maintaining EE earnings Evidence provided during interviews, meetings

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	W-2s.				
<u>Equipment Inventory</u>					
F37	Charter school has policies addressing the purchase and maintenance of equipment.	<input type="checkbox"/> Equipment purchase and maintenance policy (Binder 6, Tab 25)	√	<input type="checkbox"/>	Policy provided in Binder 6 (Business/Finance)
F38	Charter school maintains an equipment inventory that is physically located on each site.	<input type="checkbox"/> Equipment inventory (Binder 6, Tab 26)	√	<input type="checkbox"/>	Assets \$5K or more in Fixed Asset Schedule included in Binder 6 docs
F39	Equipment purchased with federal funds is properly identified.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q22)	√	<input type="checkbox"/>	Any purchases of federal funds identified via separate resource code
<u>Student Attendance (All Schools)</u>					
F40	Charter school uses a generally approved attendance accounting system.	<input type="checkbox"/> Screenshot of attendance accounting system (Binder 6, Tab 27)	√	<input type="checkbox"/>	Pathways is Attendance Accounting System. Reconciled Oct. 2019 ADA report Review of ADA claimed by teacher, student, grade levels
F41	There is a designated staff person responsible for administering attendance.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20)	√	<input type="checkbox"/>	Met with responsible individual and reviewed sample reports. Appears very knowledgeable of attendance claiming process
F42	Charter school calendar includes a minimum of 175 instructional days.	<input type="checkbox"/> School calendar (Binder 6, Tab 28)	√	<input type="checkbox"/>	Calendar provided in Binder 6. School Start 8/20/19, many diff student start dates
F43	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).	<input type="checkbox"/> Class/bell schedule (Binder 6, Tab 29)	√	<input type="checkbox"/>	Example of a 7 hour Day provided in Binder 6. Certification of Instructional minutes Documents also included in Binder 6 as evidence of meeting minimum minutes requirements. Instructional Lead for DCOT reviewed compliance to minimum minutes

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
					by grade
F44	Student absences are excluded from apportionment days.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q1)	√	√	Received Oct. 2019 Monthly Report during interview meeting. Almost zero student absences are reported. 99.8% Total ADA Yield to Enrollment
F45	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q2)	√	√	Total teacher count on ADA report provided did NOT reconcile to Payroll or Credential lists given. Over 400 Teaching staff included in Oct. 2019 Attendance/ADA Report. Yet, only approx. 200 certificated staff names provided as roster of Teacher of Record, as well as Payroll GL report by teacher (200 Teacher difference with ADA claiming report)
F46	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 31)		√	Attendance reports received by authorizing district with back-up documents. 99.8% ADA Yield to Enrollment. Appears unreasonable almost all students have 100% attendance. Instructional Lead of DCOT reviewed work sample evidence for claiming ADA
F47	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	√		Procedures received demonstrated adequate system for enrolling students. However, the issue of significant teacher payroll transfers between many other Inspire District Office supported schools creates a process where dual enrollment cannot be verified unless all 14 Inspire District Office schools ADA by teacher reporting can be compared and verified that no dual enrollment exists
F48	Charter school has clear procedures for disenrolling students and providing notification to the student's district of residence.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	√	√	Reviewed by Instructional Lead of DCOT. Procedure detailing process noted during review

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F49	Charter school has clear procedures for claiming and reporting ADA to the state.	<input type="checkbox"/> Policies and procedures related to claiming and reporting ADA (Binder 6, Tab 33)	√	<input type="checkbox"/>	Required Attendance Reports submitted to state for claiming and reporting ADA Process reconciles 3 parts of Claiming ADA (Student logs, verification of work samples and teacher verification of work completed provided). Again, the significant amount of teacher payroll transfers and their related ADA was unverifiable with data provided.
F50	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	<input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q3)	√	√	Unsure. Difficult to verify unless all students can be verified for all 14 Inspire DO supported charter schools due to significant amount of teacher transfers and leased teachers via a leased teacher agreement with all 14 charters
<u>Student Attendance (Schools Offering Independent Study)</u>					
F51	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).	<input type="checkbox"/> Certification (Binder 6, Tab 34) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q1)	√	√	Per Instructional Lead on DCOT, rigor verified as similar as classroom based school
F52	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q1) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q1) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q2)	√	<input type="checkbox"/>	Per Instructional Lead on DCOT, evidence of communication at least twice per month provided during review, as well as student samples provided during review process
F53	Charter school retains evidence of satisfactory educational progress for each	<input type="checkbox"/> Sample grade books (Binder 6, Tab 35) <input type="checkbox"/> Sample transcripts (Binder 6,	√	<input type="checkbox"/>	Received work sample docs of Grade Books, transcripts and work samples provided during interview, Instructional review for ADA

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	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"> <input type="checkbox"/> Tab 36) <input type="checkbox"/> Work samples (Binder 6, Tab 37) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q2) 			recording completed by Instruction lead. This review focused on process and by samples provided work products were signed by supervising teacher
F54	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"> <input type="checkbox"/> List of course offerings (Binder 6, Tab 38) 	√	<input type="checkbox"/>	Course listings provided in Binder reviewed. Instructional Lead for DCOT confirmed appropriateness of course offerings
F55	The program of each student in independent study is overseen by a certificated employee.	<ul style="list-style-type: none"> <input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q4) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q3) 	√	<input type="checkbox"/>	Due to the significant number of teacher transfers into charter school and related staff not included in certificate "teacher of record" lists, unable to verify this is the case unless all Inspire DO supported charters taking part in Leased Teacher MOU are reviewed
F56	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"> <input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q2) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q4) 	√	√	School appears to meet ratios from reports provided. However, again, unable to completely verify due to the significant amount of teacher, and thus ADA transfers, between all Inspire DO supported charter schools
F57	Governing board has adopted and implemented written policy regarding the maximum length of time (by grade level and type of program) that may elapse	<ul style="list-style-type: none"> <input type="checkbox"/> Board policy (Binder 6, Tab 40) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q5) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q5) 	√	√	Copy of Policy Provided in Binder 6 (Business & Finance). Instructional Lead of DCOT reviewed appropriateness of policy. Evidence of policy confirmed

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	between independent study assignment and completion.				
F58	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.	<input type="checkbox"/> Board policy (Binder 6, Tab 41) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q6) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q6)	√	<input type="checkbox"/>	Copy of Policy Provided in Binder 6 (Business & Finance) confirmed evidence of policy Instructional Lead of DCOT reviewed appropriateness of policy
F59	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	<input type="checkbox"/> Sample agreements (Binder 6, Tab 42) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q7) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q7)	√	<input type="checkbox"/>	Received copies of sample enrollment agreements during interviews, meetings Evidence noted per review of the sample agreements provided during interview/meetings
F60	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q3)	√	<input type="checkbox"/>	Confirmed by Special Education Lead of DCOT that IEPs for students participating in IS provided for placement per student's IEP
F61	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q4)	√	<input type="checkbox"/>	Only independent study students attend the charter. Appropriateness of student offerings reviewed by Instructional Lead of DCOT
F62	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	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q5)	√	<input type="checkbox"/>	Per samples reviewed, only students that are residents in county where apportionment claim is reported, or residents of a county immediately adjacent to the county in which an apportionment is reported are claimed. Again, review of ADA claimed

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	the apportionment claim is reported.				related to the approx 200 transferred teachers to school and related ADA was not reviewed
F63	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q6) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q8) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q8)	√	√	Received sample work product docs during interview/visit. Thru samples provided, process verified. Instructional review for ADA recording related to work samples completed by Instructional Lead of DCOT
F64	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q7)	√	<input type="checkbox"/>	Instructional review of claiming appropriateness conducted by Instructional Lead of DCOT. Samples of student work provided during interviews/meetings and review noted evidence that student work is judged by certificated teacher
F65	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 type="checkbox"/> Request for determination of funding (Binder 6, Tab 44) <input type="checkbox"/> SBE determination of funding (Binder 6, Tab 45)	√	<input type="checkbox"/>	Copy of Form Provided in Binder 6 (Business & Finance) noting school's submitting of Request of Determination Funding form
F66	SBE issued determination of funding correspondence	<input type="checkbox"/>	√		Copy of Form Provided in Binder 6 (Business & Finance) of CDE issued funding determination
815-21/4533779.4					
<i>If school does offer independent study:</i> Total "No" Responses: _____ Risk Assessment: 0-16 Low 17-32 Moderate 33+ High					

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff Person: Cynthia R. Free
 Position of Assigned Staff Person: Personnel Lead

CABRILLO POINT ACADEMY PERSONNEL OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
All Employees					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 0-N/A 	✓	•	Charter approval 2019-2024 Concern: MOU - Leased Teachers with ALL Inspire charter school.
P2	Charter school employee handbook and policies guarantee fair hiring practices.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) 	✓	•	Extensive Employee Handbook- At will employees
P3	Charter school enters employment contracts with all persons hired to work at school.	<ul style="list-style-type: none"> Sample employment contracts (Binder 5, Tab 5) 3 Samples 	✓	•	3 employment contract samples- 2Home School Teachers and 1 Coordinator
P4	All employees have been fingerprinted, including Department of Justice background checks.	<ul style="list-style-type: none"> Documentation of fingerprint clearance for all employees (Binder 5, Tab 6) 	✓	•	265 employees listed with DOJ clearance dates At site visit - received new list of 215 employees
P5	All employees have passed the TB test and results are current.	<ul style="list-style-type: none"> Documentation of current TB test results for all employees (Binder 5, Tab 7) 	✓	•	265 employer TB verifications. 16 expired. At site visit - new list 215 employees. All had TB clearances
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 8) 	✓	•	310 certificates At site visit - new list 215 employees - All completed
P7	If a charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 9) 	✓	•	308 certificates for Non-managers At site visit - new list Managers only. 16 managers completed supervisor training
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	<ul style="list-style-type: none"> Observation of main office (Binder 1, Tab 11, Q4) 	✓	•	At Azusa Main Office site.

P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 	✓	Employee Handbook pg 28,29- Leaves. Be employed 12 months or 1250 hrs prior to leave.
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 	✓	Employee Handbook pg 38 - PTO days
P11	Governing board approves personnel actions.	<ul style="list-style-type: none"> Governing board minutes (Binder 5, Tab 10) 	✓	No personnel actions listed for board to approve
<u>Certificated Employees</u>				
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	Approved Charter-2017-2023. No teachers on Org chart. Did not receive a list of teachers/with students. Concern: Leased Teacher MOU with all Inspire Charter schools?
P13	Charter school provides teachers with professional development opportunities.	<ul style="list-style-type: none"> Professional development calendar (Binder 5, Tab 12) Professional development session agenda (Binder 5, Tab 13) Teacher interview (Binder 1, Tab 4, Q2) 	✓	Professional Dev plan 19-20 Monthly. Training Calendar 19 modules. - Not sure what Training are (Oct-Dec 2019) No calendar dates. At site visit - Trainings were explained (online) Added PD monthly calendar and more specific information - Complete teacher interview at site visit
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.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by core teachers (Binder 5, Tab 14) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	278 teachers (in binder) At site visit given new list of - 209 teachers. Concern: Huge difference of teachers from 10/2019 - 2/2020? rechecked list -all teachers had credentials for core assignments.
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by teachers (Binder 5, Tab 15) 	✓	List of 175 teachers (in binder) 1 teacher had expired credentials. (no longer working) At site visit New list of 209 teachers. Rechecked-not all teachers had EL authorizations. List was confusing and had Adm and Service staff. Principal at CPA sent a letter to correct EL discrepancies by 6/30/21.

P16	Teachers providing special education and related services have required credentials and certifications.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by special education teachers (Binder 5, Tab 16) 	✓	•	45 teachers (in binder). At site visit- new list. 30 teachers. Rechecked all had special ed credentials.
P17	Charter school leadership conducts regularly, timely evaluations of teachers.	<ul style="list-style-type: none"> Sample evaluations (Binder 5, Tab 17) Teacher interview (Binder 1, Tab 4, Q3) 	✓	•	3 sample evaluations. Teacher interview completed at site visit. Core teacher
Classified Employees					
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.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of qualifications held by classified aides (Binder 5, Tab 18) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	•	✓	No info in T-18 Received new classified staff list to review documentation. 6 Support Staff. Only received documents on 2 staff employees. Not Complete.
<p>Total "No" Responses: <u>4</u> - Low —</p> <p>Risk Assessment 0-4 Low 5-8 Moderate 9+ High</p>					

815-21/4533780.4

Assigned District Staff Person: Linda Kimble
 Position of Assigned Staff Person: Educational Program Lead

CABRILLO POINT ACADEMY EDUCATIONAL PROGRAM OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) 	√	<input type="checkbox"/>	
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q1) 	√	<input type="checkbox"/>	
E3	Charter school staffing complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Staffing chart (Binder 2, Tab 3) 	√	<input type="checkbox"/>	Staffing
E4	Charter school staffing is sufficient to carry out educational program.	<ul style="list-style-type: none"> Staffing chart (Binder 2, Tab 3) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2) 	<input type="checkbox"/>	√	The staff at Cabrillo Point is insufficient to oversee the vendors assigned to students in their program. And, by design they do not directly oversee many of the high school teachers, who are employed by others. Without direct (high school teachers) or sufficient (vendors) oversight, we cannot assert staffing is sufficient to carry out the program.
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.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) 	√	<input type="checkbox"/>	
E6	Charter school has obtained WASC accreditation, if applicable.	<ul style="list-style-type: none"> WASC accreditation (Binder 2, Tab 5) 	√	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Services to Special Populations						
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> • Student handbook (Binder 2, Tab 4) • SELPA policies and procedures manual (Binder 2, Tab 6) • CALPADS reports for Fall 1 submission (Binder 2, Tab 7) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed	
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> • Student handbook (Binder 2, Tab 4) • SELPA policies and procedures manual (Binder 2, Tab 6) • CALPADS reports for Fall 1 submission (Binder 2, Tab 7) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q4) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed	
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> • Student handbook (Binder 2, Tab 4) • SELPA policies and procedures manual (Binder 2, Tab 6) • CALPADS reports for Fall 1 submission (Binder 2, Tab 7) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q5) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed	
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> • Sample IEPs (Binder 2, Tab 8) • Sample 504 plans (Binder 2, Tab 9) • Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed	
E11	All required members of IEP teams attend IEP meetings.	<ul style="list-style-type: none"> • Sample IEPs (Binder 2, Tab 8) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed	
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<ul style="list-style-type: none"> • Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed	
E13	Charter school ensures that special education funds are not used to serve students identified for	<ul style="list-style-type: none"> • Director of finance (or equivalent) interview (Binder 1, Tab 2, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

	accommodations under Section 504.					
E14	Charter school follows process for identification and reclassification of students who are English Learners.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q7) 	✓	•		
E15	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"> Student handbook (Binder 2, Tab 4) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q8) 	✓	□		
Curricular Materials						
E16	Charter school uses standards-aligned instructional materials.	<ul style="list-style-type: none"> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Classroom observations (Binder 1, Tab 10, Q1) 	✓	□		
E17	Charter school uses instructional materials that address the specific needs of English Learners.	<ul style="list-style-type: none"> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q9) Classroom observations (Binder 1, Tab 10, Q2) 	□	✓		While attempts are made to address the needs of English learners, instructional materials and services provided are insufficient to address the specific needs of English learners in this instructional setting. Greater oversight of instruction and more frequent instructional delivery is needed to address specific student needs and tailor learning to meet student needs.
E18	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"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q10) Classroom observations (Binder 1, Tab 10, Q3) 	□	✓		It is not clear that integrated ELD is happening in alignment with State standards.
E19	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"> Class schedule (Binder 2, Tab 11) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q11) Classroom observations (Binder 1, Tab 10, Q4) 	□	✓		The amount and quality of designated ELD is not sufficient to comply with State requirements.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assessment						
E20	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"> Assessment calendar (Binder 2, Tab 12) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) 	√	<input type="checkbox"/>		
E21	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607(b).	<ul style="list-style-type: none"> SBAC (Binder 2, Tab 13) Dashboard Data (Binder 2, Tab 14) 	<input type="checkbox"/>		Possible No: 12% of the students who would have taken the CAASPP test opted out. This is an enormous percentage. And, performance on the CAASPP is low. These factors put renewal at risk.	
E22	Charter school has completed and timely posted a SARC containing required elements.	<ul style="list-style-type: none"> SARC (Binder 2, Tab 15) 	√	<input type="checkbox"/>		
E23	Charter school regularly collects student achievement data and reports it to parents and staff.	<ul style="list-style-type: none"> Sample data reports to parents (Binder 2, Tab 16) Sample data reports to staff (Binder 2, Tab 17) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q13) 	√	<input type="checkbox"/>		
E24	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"> Notifications (Binder 2, Tab 18) 	√	<input type="checkbox"/>		
E25	Charter school has current LCAP/LCAP Update that has been presented to, reviewed and approved by the Charter School's governing board.	<ul style="list-style-type: none"> LCAP/LCAP update (Binder 2, Tab 19) Minutes from Board meeting (Binder 2, Tab 20) 	√	<input type="checkbox"/>		
E26	Title I funds/categorical funding are being used to supplement the school's LCAP goals.	<ul style="list-style-type: none"> LCAP/LCAP update (Binder 2, Tab 19) Director of finance (or equivalent) interview (Binder 1, Tab 2, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Admissions					
E27	Charter school complies with the admissions practices described in the approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	<ul style="list-style-type: none"> Charter school student data (Binder 2, Tab 23) Student data from nearby school districts (Binder 2, Tab 24) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Ethnic counts are similar to Dehesa, however the count for English learners is low in comparison to the chartering district and San Diego County.
E30	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 cover options and enrollment assistance information.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	
E31	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.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
Discipline					
E32	Charter school discipline policies and practices are consistent with terms of charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	
E33	Student discipline procedures comply with due process requirements set forth in Education Code	<ul style="list-style-type: none"> Discipline policies and procedures, including policies regarding discipline of students with 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

	section 47605, charter, and/or discipline policies and procedures, including all requirements for disciplining students with disabilities.	disabilities (Binder 2, Tab 25) <ul style="list-style-type: none"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q14) 		
E34	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"> Discipline data (Binder 2, Tab 26) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>
<u>Health and Safety</u>				
E35	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.	<ul style="list-style-type: none"> School safety plan (Binder 2, Tab 27) 	<input type="checkbox"/>	<input type="checkbox"/>
E36	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"> Training sign-in sheets (Binder 2, Tab 28) Observation of main office (Binder 1, Tab 11, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>
E37	Charter school has a policy/procedure for visitors to enter and leave campus.	<ul style="list-style-type: none"> Policy or procedure (Binder 2, Tab 29) 	<input type="checkbox"/>	<input type="checkbox"/>
E38	Charter school provides for the screening of pupils' vision, hearing, screening for scoliosis, and required immunizations.	<ul style="list-style-type: none"> Records of student screenings (Binder 2, Tab 30) 	<input type="checkbox"/>	<input type="checkbox"/>
E39	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"> Suicide Prevention Policy (Binder 2, Tab 31) Board meeting minutes (Binder 2, Tab 32) 	<input type="checkbox"/>	<input type="checkbox"/>

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

E40	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 findings are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> Application for universal meal service (Binder 2, Tab 33) Governing board resolution (Binder 2, Tab 34) 	<input type="checkbox"/>	<input type="checkbox"/>	
E41	Charter school provides at least one meal per day to students who qualify for FRPL.	<ul style="list-style-type: none"> Executive director (or equivalent) interview (Binder 1, Tab 3, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	
E42	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"> Screenshot from website (Binder 2, Tab 35) 	<input type="checkbox"/>	<input type="checkbox"/>	
E43	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.	<ul style="list-style-type: none"> Sexual health and HIV prevention education course description (Binder 2, Tab 36) 	√	<input type="checkbox"/>	
E44	By January 1, 2020, 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.	<ul style="list-style-type: none"> Policy or other description of method for informing parents/guardians (Binder 2, Tab 37) 	<input type="checkbox"/>	<input type="checkbox"/>	
Parent Notifications					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 38) 	<input type="checkbox"/>	<input type="checkbox"/>	
E46	If charter school serves students in 11th grade, parents of those students are notified by January	<ul style="list-style-type: none"> Notice (Binder 2, Tab 39) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

	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).					
E47	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).		<input type="checkbox"/>	• Notice (Binder 2, Tab 40)	<input type="checkbox"/>	
E48	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.		<input type="checkbox"/>	• Notice (Binder 2, Tab 41)	<input type="checkbox"/>	
Student Records						
E49	Charter school maintains comprehensive records regarding its students.		<input checked="" type="checkbox"/>	• Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42)	<input type="checkbox"/>	
E50	Charter school maintains student records, including special education records, in a confidential and secure location.		<input checked="" type="checkbox"/>	• Policy regarding confidentiality of student records (Binder 2, Tab 43) • Observation of main office (Binder 1, Tab 11, Q3)	<input type="checkbox"/>	
E51	Charter school has a policy or procedure for parents to review student files, including a log.		<input type="checkbox"/>	• Policy regarding review of records (Binder 2, Tab 44)	<input type="checkbox"/>	
E52	Charter school has policy or procedure regarding release of student information.		<input type="checkbox"/>	• Policy regarding release of student information (Binder 2, Tab 45)	<input type="checkbox"/>	
E53	Teachers have reasonable access to special education records.		<input type="checkbox"/>	• Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q15)	<input type="checkbox"/>	
Total "No" Responses: 6 Risk Assessment in Bold 0-13 Low 14-26 Moderate 27+ High						

8:15-21/4535127.4

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:
 JoAnn Murphy
 Position of Assigned Staff Person:
 Special Education Lead

CABRILLO POINT SPECIAL EDUCATION OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<input checked="" type="checkbox"/> Approved charter (Binder 2, Tab 1) <input type="checkbox"/> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2)	X		6/28/16 MOU with Dehesa under Inspire Charter School South; 4/2/18 MOU as LEA within El Dorado SELPA for special education purposes.
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<input checked="" type="checkbox"/> Approved charter (Binder 2, Tab 1) <input checked="" type="checkbox"/> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) <input checked="" type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, 01)	X		Curriculum is aligned and integrated with the IEP for students with disabilities on an individual basis. At initial placement the IEP is reviewed with the parent and reviewed within 30 days to determine if placement is appropriate. Most of the target special education population are in the mild/moderate range.
E3	Charter school staffing complies with approved charter.	<input checked="" type="checkbox"/> Approved charter (Binder 2, Tab 3) <input type="checkbox"/> Staffing chart (Binder 2, Tab 3)	X		Cabrillo Point operates under all administrative regulations and procedures of the El Dorado SELPA for special education.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E4	Charter school staffing is sufficient to carry out educational program.	<ul style="list-style-type: none"> ✓ Staffing chart (Binder 2, Tab 3) ✓ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2) 			The IEP specialists supports the appropriate development of IEPs; Programs are supported by Program Specialists; Teachers have caseloads of 10 students with a lot of integration with staff. Parents reported that there is great consistency and programs and services.
<u>Services to Special Populations</u>					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> <input type="checkbox"/> Student handbook (Binder 2, Tab 4) ✓ SELPA policies and procedures manual (Binder 2, Tab 6) <input type="checkbox"/> CALPADS reports for Fall I submission (Binder 2, Tab 7) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab I, Q3) 			The school follows policies and procedures of the SELPA; Consultant did a random review of IEPs in SEIS and met with parents to confirm that there are appropriate practices that are consistently implemented for student that enroll with IEPs. Oversight EI Dorado
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> <input type="checkbox"/> Student handbook (Binder 2, Tab 4) <input type="checkbox"/> SELPA policies and procedures manual (Binder 2, Tab 6) <input type="checkbox"/> CALPADS reports for Fall I submission (Binder 2, Tab 7) <input type="checkbox"/> instructional leader (or equivalent) interview (Binder 1, Tab I, Q4) 			Evidence of Student Study Team Process for both IDEA and 504. Verified by parents participating in both. Oversight by EI Dorado

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<input type="checkbox"/> Student handbook (Binder 2, Tab 4) <input type="checkbox"/> SELPA policies and procedures manual (Binder 2, Tab 6) <input type="checkbox"/> CALPADS reports for Fall I submission (Binder 2, Tab 7) <input type="checkbox"/> instructional leader (or equivalent) interview (Binder 1, Tab 1, Q5)			<p>Timelines were verified by unannounced SEIS review of random IEP files</p> <p>Oversight by El Dorado</p>
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<input type="checkbox"/> Sample IEPs (Binder 2, Tab 8) <input type="checkbox"/> Sample 504 plans (Binder 2, Tab 9) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6)			<p>No evidence that service tracker or some method of documentation is used to track the provision of services in the IEP—This is not a risk area for Dehesa oversight.</p>
E11	All required members of IEP teams attend IEP meetings.	<input type="checkbox"/> Sample IEPs (Binder 2, Tab 8)			<p>Oversight by El Dorado</p> <p>Parents gave positive feedback about the IEP meetings and the level of involvement of staff and the options for zoom IEP meetings.</p>
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<input type="checkbox"/> Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10)			<p>9.7% of the school population is students with disabilities; the statewide average is 11.9% of general education population but 9.7% it is not disproportionately small number of students with disabilities.</p>

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E13	Charter school ensures that special education funds are not used to serve students identified for accommodations under Section 504.	√ Director of finance (or equivalent) interview (Binder 1, Tab 2, Qi)	X		El Dorado has oversight for special education funds and usage. The 6500 resource code expenditures diligently reviewed to ensure that special education funds are used appropriately
Assessment					
E20	Charter school administers state - mandated testing according to testing rules and regulations as required for all K-12 schools in California.	√ Assessment calendar (Binder 2, Tab 12) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12)	X		Did not meet state targets for English/Language Arts and Math Participation rate and also did not meet target for math achievement rate. Identified for PIR monitoring-oversight by EL Dorado for resolution of PIR
Admissions					
E27	Charter school complies with the admissions practices described in the approved charter.	<input type="checkbox"/> Approved charter (Binder 2, Tab 1) <input type="checkbox"/> Admissions/enrollment forms and policies (Binder 2, Tab 21) <input type="checkbox"/> Lottery procedures (Binder 2, Tab 22)			
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	√ Admission s/enrollment forms and policies (Binder 2, Tab 21)	X		The admissions process is the same but for students with an IEP/ the IEP is reviewed and an interim IEP is scheduled per administrative procedures of the El Dorado SELPA.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background students with disabilities, English learners , and FRPL students).	<ul style="list-style-type: none"> √ Charter school student data (Binder 2, - Tab 23) √ Student data from nearby school districts (Binder 2, Tab 24) 	X		
Discipline					
E32	Charter school discipline policies and practices are consistent with terms of charter. section 47605, charter, and/or discipline policies and procedures, including all.	<ul style="list-style-type: none"> √ Approved charter (Binder 2, Tab 1) √ Discipline policies and procedures, including policies regarding discipline of 	X		
E33	Student discipline procedures comply with due process requirements set forth in Education Code requirements for disciplining students with disabilities.	<ul style="list-style-type: none"> √ Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder I, Tab I 014) 	X		
E34	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"> √ Discipline data (Binder 2, Tab 26) √ Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	X		
Student Records					
E49	Charter school maintains comprehensive records regarding its students.	<ul style="list-style-type: none"> √ Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42) 	X		Records are stored in a confidential area.
E50	Charter school maintains student records, including special education	<ul style="list-style-type: none"> √ Policy regarding confidentiality of student records (Binder 2, Tab 43) 	X		All IEPs are maintained in the SEIS system and are secured by a confidential password and password.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

	records, in a confidential and secure location.	√ Observation of main office (Binder 1, Tab 11, Q3)			All teachers have access to records and general education teachers have read only access.
E51	Charter school has a policy or procedure for parents to review student files, including a log.	√ Policy regarding review of records (Binder 2, Tab 44)	X		
E52	Charter school has policy or procedure regarding release of student information.	√ Policy regarding release of student information (Binder 2, Tab 45)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff: Justin Cunningham
 Position of Assigned Staff Person: Project Lead

CABRILLO POINT ACADEMY OPERATIONS/FACILITIES OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Maintenance of Facilities					
O32	A designated person is responsible for overseeing operations and facilities management.	√ Staff organizational chart (Binder 4, Tab 1)	X		After discussing with CPA their lack of compliance evidence, this was resubmitted with "Facilities" below Principal.
O33	Facilities are adequate for number of students and types of programs.	<input type="checkbox"/> Capacity chart for campus facilities (Binder 4, Tab 2) <input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q1)		X	Tab 2 only included statement that CPA "is an Independent Study School"
O34	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 type="checkbox"/> Inspection logs (Binder 4, Tab 3) <input type="checkbox"/> Operations manager (or equivalent) interview ((Binder 1, Tab 5, Q2)		X	Nothing submitted in Tab 3
Legal Compliance					
O35	All facilities meet Americans with Disabilities Act requirements.	<input type="checkbox"/> ADA certification (Binder 4, Tab 4)		X	Nothing submitted in Tab 4
O36	All single-user restrooms have been designated as all-gender restrooms.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q3)	X	X	Nothing submitted in Tab 5, but observed at Poway office
O37	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan (Binder 4, Tab 5)			Nothing submitted in Tab 5
O38	Charter school has certificate of occupancy on file.	<input type="checkbox"/> Certificate of occupancy (Binder 4, Tab 6)			Nothing submitted in Tab 6

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O39	Charter school has conditional use permit on file, as applicable.	<input type="checkbox"/> Conditional use permit (Binder 4, Tab 7)		X	Nothing submitted in Tab 7
O40	Charter school has safety inspection by local fire department on file.	<input type="checkbox"/> Safety inspection by local fire department (Binder 4, Tab 8)		X	Nothing submitted in Tab 8
O41	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.	<input checked="" type="checkbox"/> Emergency action plan (Binder 4, Tab 9) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q4)	X	X	An incomplete Comprehensive School Safety Plan is submitted for 1740 Huntington Drive, Duarte CA, along with a statement stating the lack of interscholastic athletics negates their requirement for emergency plan, but they resubmitted a filled out plan for the Inspire Poway Offices Also included was a 3 pg Emergency action plan for a resource center in Laguna Niguel.
O42	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q5)			N/A They are just below the 40%
O43	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q12)			N/A
O44	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	<input checked="" type="checkbox"/> Certificates of insurance (Binder 4, Tab 10)	X		The resubmitted evidence is dated 3/26/20 for Inspire Charter School-South.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O45	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1.	<input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q7)	X		
O46	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 (Binder 4, Tab 11) <input checked="" type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q8, Q9)	X		All facilities such as those leased, rented or subleased are not listed, but a rough list of the type of places they met was submitted. No locations were given.
O47	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 (Binder 4, Tab 11) <input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q10)		X	The evidence includes a resource center address in Laguna Niguel that is not in the petition or material revisions.
<p>Total "No" Responses: <u>9</u></p> <p>Risk Assessment: 0-4 Low 5-7 Moderate 8+ High</p>					

The site Principal tried to comply, but was directed by Inspire that this compliance did not apply to their students because it was an independent study charter and the document binder has many blank tabs. The oversight process helped the Principal to understand the Compliance Areas more and what evidence was needed. The CPA Principal resubmitted a few pieces of evidence that reduced their risk level a little. 815-21/4533461.5

A large yellow triangle is positioned on the left side of the page, pointing towards the top-right corner. The rest of the page has a light yellow background.

Dehesa Charter Oversight Report

**Pacific Coast
Academy**

Pacific Coast Academy: Governance

Specific Context

Pacific Coast Academy was originally incorporated as Learning Latitudes Charter School in May 2017 and re-named in April 2018. The charter projected enrollment of 150 in Year 1, growing to 450 in Year 5. Current enrollment (Year 4) is over 4,000 students. New board members were elected when the bylaws were changed to eliminate ICS as “sole statutory member.”

Specific Concerns

- Board packets are complete and members are prepared, but questions were focused on details rather than established school goals and larger strategic issues. Complex agreements, such as the MOU for leasing of instructional staff and short-term borrowing, did not appear to be challenged, despite the changed governance responsibilities.
- Board remains heavily influenced by Provenance and the principal. For example, no effort had been made to explore possible alternatives to continuing the Charter Impact contract or replacing expensive Provenance services.
- The charter states that one director position will be reserved for a parent or community member. In selecting that individual, it appeared the board had no overall goals for board composition, including needed areas of expertise
- Change in student locations and enrollments within the network has resulted in rapid growth of the school’s enrollment, well beyond that which was projected in the charter and without material revision or other notice to the authorizer. (The school has 10 times more students than projected in the approved charter for this school year.) Growth in enrollment from 18-19 to 19-20 was over 40%. No discussion of major enrollment growth and relocation/re-enrollment of students is reflected in the minutes.
- Is the organization operated and governed effectively?
 - ◊ Governance is weak, with a new and inexperienced board heavily influenced by the principal and service providers. The elimination of the sole statutory member was not accompanied by any plan for developing board capacity or a schedule of key contracts and decisions. Decision-making appears to remain “top down” through Provenance; costly contracts for services remain in place;
- complex arrangements for shared staff continue. The board is not in a position to hold leadership accountable for performance of the individual school.
- Is the school meeting public policy purposes?
 - ◊ The significant role of Provenance in school operations and its influence over governance, combined with Provenance’s lack of transparency, undermines public policy goals. The structure makes it difficult for the board to govern based on school outcomes.

Oversight Checklist Risk Assessment: Low

Overall Risk Assessment: Weak

Specific Recommendations

Request a revised projection of enrollment growth over the remainder of the charter term. Consider a change to the MOU to include a “trigger” for material revision based on enrollment growth over a certain percentage of the charter’s projection.

Pacific Coast Academy: Business/Finance

Context

After review and analysis of documents provided by Pacific Coast Academy (PCA), interviews, and reviews of Checklist Compliance Areas were performed during site visits and follow-up communication with the PCA and its support organization. Due to the sheer volume of items (66) to be reviewed in this section, a scoring system using a formula from the number of “no” responses may not reveal the true risk assessment for PCA. From a strict formula calculation perspective, a score of less than 25% “no” responses or (12 out of 66) indicates a low risk score per the checklist metric. However, after further research, data gathering, analysis and process reviews as a result of data provided and responses from PCA and its support organization, Inspire District Office, a risk rating of “High” is warranted. Because of this risk concern due to an in-depth review of related processes of items on the checklist, two risk scores are provided for in this summary. **An Oversight Checklist Risk Assessment** based on a calculation of “no” responses to total responses of the checklist is provided. An **Overall Risk Assessment** is also given based on additional review of information provided, processes analysis, and related risk to the Dehesa School District as a result of the further research of checklist items.

During site visit on February 25, 2020 in Azusa, CA, site of Inspire District Office, the review process began with an interview/meeting with Krystin Demofonte, Principal of Pacific Coast Academy. Cynthia Free, Personnel Lead for the DCOT, also participated in the discussion with Ms. Demofonte. Our discussion began with questions regarding the overall school organization, Ms. Demofonte’s role and background with the charter school, and the relationship between the school and Provenance. During this conversation, Ms. Demofonte volunteered insights into the recent reorganization of the charter school and her newly assigned role as Principal of the school. As a result of our discussion, significant questions arose regarding the operational relationship with Provenance and the charter school.

During the interviews and meetings of the day, I found Ms. Demofonte to be genuinely motivated and forthcoming in our discussions. Her genuine concern and dedication to support the students of the school was apparent. It was noticeable by her comments that she had been “thrown” into a very difficult situation in what can be described as a “spur of the moment” action at the beginning of the school year in July 2019.

The comments noted above are noteworthy as they demonstrate a perceived culture and environment that exists or existed with the school and Inspire District Office.

It is also noted after the review that many of the items on the checklist for Business/Finance were prepared and presented well and in a timely fashion, and met requirements for state fiscal reporting and processes. This report is intended to be a summary and speak practically and informationally on significant issues that create a high-risk level for the authorizing district to consider.

Concerns:

Charter school board appears to be unaware of significant expenditures, fiscal transfers and other major budget actions and decisions. Specifically, payroll transfers for the period of July 2019 through December 2019 totaling approximately \$8.1M related to the transfer of 497 Inspire District Office supported school staff. It was noted that a good portion of these transfers were completed in October 2019 and November 2019 when transfers were made in one month and then reversed the following month. “Due To/From” inter-company transfers (\$2.0M originally budgeted) from the school’s accounts to other Inspire District Office supported charter schools are examples of the school board appearing to be unaware of significant expenditures or fiscal activity.

Typically, resolutions are prepared so school boards are certain to become aware of such fiscal transactions. Per a master agreement between all 14 Provenance supported charter schools, lending and borrowing within the Inspire schools was allowed. However, no request to loan or borrow documents was observed to have been provided or reviewed by the Pacific Coast Academy Board other than an exhibit included in the Master Credit Agreement at the June 28, 2019 Board Meeting.

In addition, during the June 2019 Pacific Coast School Board Meeting a resolution of the Board of Directors for Revenue Notes Series 2019B & 2019C was approved. The resolution notes an agreement between three other Inspire Charter Schools (ICS) supported schools (Kern, Inspire Charter Central, and Heartland) and Pacific Coast. This resolution, as well as the master agreement with the other 14 ICS supported schools for fund transfers between the schools, allows them to facilitate operations of Pacific Coast Academy that should be local board decisions.

Also noted are payroll transfers related to a Leased Teacher MOU Agreement between the school and the 13 other Inspire District Office supported charter schools. As mentioned above, \$8.1M in payroll transfers affecting 497 teachers/staff teachers was transferred per the Leased Teacher Agreement MOU with all 14 Inspire District Office supported charter schools. Through review of documents and board agendas, no additional approval or acknowledgement of these transfers were found.

It is also noted the Leased Teacher MOU Agreement was recently approved by the school board during its March 2019 meeting. The ability of the school board to meet its fiduciary obligation to the school instead of the administration and “outside vendors” appears limited. A copy of spreadsheet summarizing payroll transfer action values and number of staff transferred included at the end of report.

Budget review and approval process meets reasonable requirements for state fiscal reporting. Charter Impact, a sub-contractor through Inspire District Office, provides fiscal reports as well as presentations detailing assumptions for projections, state charter education formulas via the Local Control Funding Formula (LCFF). Upon review of the latest fiscal projections for PCA per the 2nd interim report, PCA is projecting an ending balance of 2.9% of total revenues.

During review of budget, fiscal and other related data, as well as during communications with Charter Impact over information provided, it was evident the Charter Impact team has a strong working knowledge of accounting, education finance, fiscal reporting and presentation of financial information. Specifically, Spencer Styles, CEO of Charter Impact, was very aware and knowledgeable of PCA’s operations and able to provide quick responses to most all questions and clarification items. However, the review process did provide concern regarding the collective capacity of the Pacific Coast Academy Board to identify any fiscal issues if needed. Most often during questions to the Principal on fiscal approval or budget issues, responses were deferred to Mr. Styles or Charter Impact staff.

One particular example the review found of concern was the significant change in the ADA projection utilized for the FY 2019-20 adopted budget vs a September 2019 budget update. Per the adopted budget, an ADA figure of 3,314 was utilized as projected ADA. Per the September 2019 budget update projections, an ADA figure of 3,928 was included in budget projections. This represents a change of 614 ADA, or an 18.5% increase over a couple month time period. No reasonable explanation could be found in discussion items or agenda items of the related Board meetings where these changes were presented. There was a mention of an ADA change due to an adjustment in a presentation document at the September 2019 school board meeting. As of the recent 2nd interim fiscal report, the school is now projecting and budgeting ADA levels for

the FY 2019-20 of 4,068 ADA. This represents an increase in original budget levels for the year of 754 ADA, or 2.8%.

After comparing the projected enrollment of 306 students in PCA's original charter petition for FY 2019-20, the current projected ADA of 4,068 for FY 2019-20 is about 13 times the number of students originally planned, projected enrollment of 306 students for FY 2019-20, the enrollment is over 13 times the original plan. In addition, it appears the 2018-19 Unaudited Actuals Report was never approved or included in an agenda item of the school's board meetings. It was noted the school did provide a copy of the Unaudited Actuals Report to the authorizing district and the report was completed. However, no evidence of the report being presented or included for approval at a PCA Board meeting could be found.

The relationship between Pacific Coast Academy and Inspire District Office via its current agreement, when compared to prior year's practices, represents a concern regarding Pacific Coast Academy's independence from Inspire District Office in its operations. Pacific Coast Academy in the current year changed from being one of several "Inspire Charter Schools" to a more independent school. In essence, all Inspire District Office supported schools converted to becoming independent schools with Inspire District Office serving as "back office" support this school year.

The many processes such as MOU's between Inspire District Office Schools; intercompany transfers between Inspire District Office supported schools; temporary lending and borrowing agreements between Inspire District Office supported schools; as well as resolutions between several Inspire Charter Schools supported schools combining to approve Revenue Notes Series for funding that is executed by the Inspire Charter Schools appointed "administrator" on behalf of the school, are evidence of the influence Inspire District Office has up- on Pacific Coast Academy.

With ADA projected of 4,068 for the current school year, PCA pays Inspire District Office 15% of its LCFF revenues for administration and educational services. This equates to an approximately \$5.6M expenditure in the current year from PCA. The sheer size of the Inspire Network schools is significant. Inspire District Office supported charter schools project a total about 36,000 ADA in the current school year. With an agreement of a 15% fee for services at all its 14 schools, Inspire District Office potentially could realize approximately \$46M in revenues as an organization. Due to the enormous size of the Inspire organization, it seems reasonable to assume significant risk is evident in the ability of the brand-new Principal and School Board with minimal education administration and fiscal oversight experience. It will take focused effort to remain independent from Inspire District Office's influence in its operations.

Part of the review process included asking the question of Inspire District Office to share its allocation of costs to support PCA or any pro rata formulas used in allocating expenditures related to its 15% of Pacific Coast Academy revenue fees received. Initially, the current Executive Director would not respond to the requested information. When prompted a second time on whether or not he would be willing to provide such data, his response was to call a meeting to discuss my "role in the process."

It did raise concern regarding the "spirit of transparency" from Inspire District Office leadership. A similar response was received from the Inspire District Office CFO when information was requested. It is noted, however, that all other members of the Inspire District Office team I met with and interviewed were very helpful, timely in their responses, and possessed a "spirit of transparency" or sharing of information.

Three separate reports identifying certificated teaching staff were provided during the review. One report was the general ledger listing payroll for certificated staff; another report was a credentialed teacher listing

provided to the Personnel Lead of the DCOT identifying the school's certificated staff; and the third listing of certificated staff was an attendance report for the month of October 2019. The payroll GL listing and credentialed teacher listing were similar with approximately 210 certificated staff listed. However, the staffing report for October 2019 included about 425 teachers. This is a difference of over 200 certificated staff between the reports.

It was noted the agreement was for the beginning of the school year in July 2019, and the MOU was not approved until the March 2020 board meeting for the school.

Also, per the agreement, an invoice is to be prepared between participating schools for each occurrence of transfer. As of April 6, 2020, no invoice for such payroll and staff transfers had been created or presented for review. As mentioned before, the amount of the transfers for the first half of the school year (July 2019 to December 2019) is approximately \$8.1M and includes the transfers of approximately 497 certificated and other staff.

The Charter Impact agreement with Inspire District Office to provide accounting, budget and fiscal reporting and processing raised an additional area of concern. The scope of work between the two organizations appears to be duplicative when reviewing the school's agreement with Inspire District Office. Included in the agreement with Inspire District Office are similar accounting, budget, fiscal reporting and processing tasks. During review of budget, 1st and 2nd interim reporting, it was noted that Charter Impact was very present in its dealings with the school's day-to-day operations and fiscal processes, as well as reporting. The review was unable to see evidence of such support from Inspire District Office in these areas as was detailed in its agreement with the school for the same services provided by Charter Impact.

Purchasing policies and processes were reviewed as well, and found to have intriguing details related to providing instructional and enrichment funds to students/family. Instructional funds are allocated and set-up for each student via the Enrichment Ordering System (EOS). Budgeted amounts are accessible into the EOS system for the student/family to use in coordination with the approval of the teacher to determine the best use of instructional funds for each student's personalized learning plan. Funds are not given to the student or family.

A review was performed of approximately 100 students' EOS purchases noting purchases made for instructional or enrichment services. Individual student reports provided listings of each student's services acquired via the EOS system, as well as a remaining balance of funds in the student's account. Approximately \$2,600 per student is allocated to each students' EOS account for a given year. Funds are "dropped" in the student's account twice a year. A list of approved vendors for acquiring services is provided to each student/family. In the event a student/family requests to utilize vendor(s) not on approved vendor list, a request for approval process is completed before allowing services to be acquired.

A challenge in the EOS system stems from items ordered via Amazon.com where the student/family receives items requested, as well as receiving documents. The purchasing/enrichment team receives an Amazon confirmation receipt utilized as a receiving document item for purchasing processing. During review of EOS approved/received instructional and enrichment services, there were many uncommon expenditures related to enrichment services for the students. A few examples of such expenditures are: surf school sessions, guitar or voice lessons, sports clubs, martial arts lessons, as well and Circus Center sessions. Per Purchasing Director, these expenditures are considered enrichment in nature and are part of the student's individualized educational program. Before EOS funds are allowed to be utilized for special interest or extracurricular activities,

students must have already purchased core subject curriculum with instructional funds or independently acquired by the parent, or a plan for all core subjects is in place.

When inquired about appropriateness of services such as surf school purchases via the EOS system, the Purchasing Director responded that it would be similar to PE or sports choices at a traditional school. She commented that this particular feature of the program is what allows students to create educational plans and extra-curricular activities that are customized to their interests. Students find the feature appealing. The business/finance review focuses on process.

Oversight Checklist Risk Assessment: Low

Overall Risk Assessment: High

Recommendations

- PCA should review specific costs of the type of support they are paying for via the 15% of revenues.
- For PCA, a review of what scope of work is actually being done by Charter Impact and what is being done by Inspire District Office appears redundant. Possibly save the 3% paid to Inspire by eliminating that portion of the agreement.
- A review by the PCA to see what precisely is being provided by Inspire most likely will reveal that PCA would be more effective if they hire staff to replace much of the work that's listed in their agreements with Inspire.
- If PCA is committed to sticking with the Inspire EOS system, they could ask for a cost quote from Inspire for a subscription service fee amount per student for use of the student. At close to \$6M each being sent to Inspire by PCA, quite a bit of savings can be realized if the charter looks at bringing people in house to do specific tasks and only agree to specific deliverable work products from Inspire.
- At some point, the economy of scale argument for back office support goes away when a charter grows to become a very large charter with over 2,000 ADA. That review by the charter seems necessary now.

Pacific Coast Academy: Personnel

Context

At the site visit with Pacific Coast Academy (PCA), there was an overall feeling with administration and teachers having great energy, strong compassion and a high level of enthusiasm for their students and staff that they worked with. The honest sincerity of these people on the front lines, like the site principals and teachers that were interviewed, felt genuine. But during the site visit, working with HR staff (Inspire District Office) there was a concern in regards to the data collection of staffing at the site. The numbers kept changing with certificated and classified staff in all of the Oversight Checklist areas. Also, based on conversations during the site visit “red flags” were up in regards to the exchange of information coming from the staff that were in charge of the data, and the administration (site principal) who participated in answering the oversight questions. Apparently there was a recent reorganization of the PCA with its name, location, students and certificated staff, which made me wonder if they (PCA and Inspire District Office) were co-mingling staff throughout all of the Inspire charter schools. There was even more concern after the conference call on March 24, 2020 regarding the MOU on “leased” teacher agreement for Inspire schools. I believe the DCOT members on the call were wondering what Inspire was doing at each charter site in regards to the teaching staff.

Concerns

- P-1 Leased teacher MOU for PCA and all Inspire charters.
- P-5 TB Not completed. Two lists were submitted. Need explanation on two staff members. On old list, not on new list at site visit on 2/25/20 TB expired staff members

- P-7 Not completed. – Anti-harassment supervisor training. Need verification of training completed.
- P-11 Governing Board does not approve personnel actions.
- P-12 Charter hires sufficient teaching staff: This is an unknown because the teaching staffing list kept changing.
- P-14 Appropriately credentialed staff list: 1st list – 177 employees; 2nd list – 116 employees; 3rd list – 218 employees. All teachers had valid core credentials that were reviewed from all three lists. HR couldn't explain the huge difference in staffing. There is a huge concern because PCA (Inspire) doesn't exactly know how many teachers are at the site. There is an inaccurate count of teachers seen through the reports HR ran three times for this oversight area.
- P-15 Not completed. Not all teachers at PCA hold an English Learner authorization.

Oversight Checklist Risk Assessment: Moderate

Overall Risk Assessment: High

Recommendations:

- Governing Board should approve personnel actions
- Close monitoring of actual numbers of teachers, EL authorizations, and implement a plan and timeline to have teachers complete EL authorization
- Implement a plan and timeline to correct lack of TB tested teachers
- Implement a timeline and plan for anti-harassment supervisor training

Pacific Coast Academy: Educational Program

Context

Pacific Coast Academy (PCA) is an independent study model attractive to homeschooled students, those seeking credit recovery, or a non-traditional school schedule. At a minimum, teachers meet face-to-face with families every 20 school days. Most teachers reportedly communicate with families on a more frequent basis via text or email. They also connect with families via Zoom, phone, and other digital platforms.

For their work at PCA, students can select from the following options to verify mastery of their completion of a standards-based education:

- standards-aligned online courses
- standards-aligned textbook materials
- online subscription package platforms
- materials with standards checklists
- high school course outlines

PCA students have the following options for instructional pathways:

Online Pathway:

Pacific Coast Academy uses several online learning platforms to meet the learning needs of students. K12/Fuel Education is used primarily by students in grades K-8th and Odysseyware primarily grades 3rd-8th.

Edgenuity and StrongMind offer courses for students in grades 6th-12th. The online platforms are Common Core, Next Generation Science Standards (NGSS), and state-standards aligned. The courses combine direct-instruction videos featuring on-screen teachers with rigorous assignments, performance tasks, and assessments to engage students and ensure subject-area mastery.

When students choose this pathway, the teachers providing some of the courses for core content areas may not be PCA teachers. While a few work for PCA, many work for other schools in the Inspire Charter School Network and are overseen by PCA staff while servicing PCA students. PCA admin have input on all teacher evals..

Textbook Pathway:

McGraw Hill is a conventional textbook package available to students in grades TK-12th in which course readings and assignments can be completed almost completely offline. Students in high school can opt to complete their coursework in packets to efficiently interact with content with minimal distraction.

Custom-Designed Pathway:

The custom-designed curriculum is a customizable learning program that allows families to choose curriculum and classes that fit their specific needs and interests. Families who wish to design and create a custom learning plan work with their teacher and curriculum coaches to use various combinations of online and textbook material, vendor classes, and special projects and experiences aligned with Common Core state standards checklists to verify course completion.

Data:

About 627 students were tested in 2018-19 CAASPP. As a group, Pacific Coast Academy students score slightly below standard in English language arts and further below standard in mathematics. Pacific Coast performance data for the 1,136 students tested shows students are 20.8 points below standard in language arts, a 21.6 point increase from the prior year. In mathematics the 1,135 Pacific Coast students tested were 71.4 points below standard, an increase of 14.3 points for PCA from the prior year.

Of the 128 English learners tested, 41% progressed at least one English Learner Performance Indicator level in one year.

Of 64 students who would have been appropriate for graduation, 75% graduated. There is no year-to-year comparison data available due to a shift in the school structure.

Demographics

Of the 2,797 students at Pacific Coast Academy, 51% are Caucasian, 24% are Hispanic, 6% are African American and 8% are two or more races. About 5.9% of the student population was made up of English Learners. By comparison, in Dehesa and its charters, the total rate of English Learners is 4%. About 40% of the students are socioeconomically disadvantaged.

The largest grade level at Pacific Coast Academy is kindergarten at 19.6%, and descends from that high point to 12th grade, dropping sharply in grade 8 through the remainder of high school.

Concerns

- There is no dashboard comparison data due to shifts in the school structure. This is problematic from a monitoring perspective, as the chartering agency cannot use dashboard data to determine student outcomes over the course of time.
- Report cards are not required and are only issued at parent request for TK-8th grade. High school students all receive report cards
- Teachers are required to interact with parents and students every 20 days. Although many teachers report more frequent interactions with parents, 20 days is a significant period of time between interactions

with a qualified teacher. This is particularly true in cases in which the parent or student does not seek additional help and is failing to succeed.

- Attendance – Reported attendance rates were extraordinarily high. 9/30/19-11/1/19 attendance statistics by teacher shows a 99.74% attendance rate for PCA.
- Pacific Coast Academy shifts responsibility for some of their instructional work to approximately 750 vendors. These vendors provide services such as extracurricular sessions and tutoring. Examples include martial arts lessons, horseback riding, math tutoring, and so on. Vendors meet with students individually or in small groups. Vendors are not required to have tuberculosis screening, although there is a background check. The onus for the child’s safety and supervision when with a vendor falls on the parent. PCA has no direct oversight with these vendors and cannot be assured students are safe and learning during this period of their program with PCA. There are two assistant directors who assist with oversight of these vendors. This model requires a monitoring process for vendors that surpasses the organization’s size and scope to monitor these services.
- Teachers across the Inspire Group of Schools are shared for subject matter instruction. Funds received for students are transferred to teachers in other schools, who in turn teach the students. In this scenario, Pacific Coast Academy cedes partial responsibility for instruction to an external entity, and as in the case with other vendors, pays them to instruct students on PCA’s behalf. There is concern that a lack of direct oversight for instruction of high school-aged students may put the quality of the instructional program at risk.
- Teachers of record stay with students throughout their time at Pacific Coast Academy. The same teachers overseeing the elementary program also oversee the high school program for students. This may bring higher risk to the guidance of the high school-aged students when their primary teacher of record is not an experienced secondary educator.
- In general, there is concern about independent student and responsibility for instruction when parents instruct students with special needs (EL or SpEd). The transference of responsibility for instruction to parents is not always appropriate given the preparation of the parents for this task. Structures are in place to assist; however, supervision of this model surpasses staff’s ability to monitor parents appropriately to ensure well-prepared, compliant services for these special categories of students. Some of the responsibility for English learner instruction is in the hands of parents, who themselves are often English learners.
- In English Language Development lessons, there is a heavy reliance on instructional software guiding the lesson design. Software and parent support, especially when the parent does not speak English well, cannot take the place of significant instructional time with a highly qualified teacher.
- Insufficient teacher time is dedicated to teachers assisting English learners, who receive 25-30 minutes per week of designated ELD from a credentialed teacher of the 100 or more minutes they should receive weekly. The ELD class is delivered once per week for 25-30 minutes with the ELD teacher. If PCA were to increase this time allocation of a highly qualified ELD teacher with English learners, it would be an acceptable model. As is currently the case, the combination of 25 minutes weekly with a teacher, instructional software and parent support combined may be insufficient to provide high-quality designated English language development instruction.
- Translation services are limited at Pacific Coast. Teachers expressed “We do our best. We use Google Translate. It is a challenge when parents don’t speak English. This is an area in which we could grow.” Although the school spoke of having hired a translator, teachers did not reflect they felt comfortable the system was ready for non-English speaking parents.
- Only 8% of the parents returned the LCAP survey; therefore the outcome of the LCAP process may not reflect parent interests.
- Pacific Coast responses to some questions were initially answered with complex and unclear documents. For example:
 - ◊ When the reviewer asked how many students opted out of CAASPP testing, a document was for

warded that contained unclear headings and many rows of untabulated text for the reviewer to discern.

Oversight Checklist Risk Score: High

Recommendations

- Develop and implement a plan and timeline for PCA to take direct responsibility for high-quality teaching via teachers who are under direct oversight of the school.
- Develop and implement a plan and timeline for PCA to ensure the safety and wellbeing of the students it serves by allocating teaching and extracurricular responsibilities to vendors other than teachers who work for Pacific Coast Academy.
- Develop and implement a plan and timeline for Pacific Coast Academy to be directly responsible for its own programs and services.
- Develop and implement a plan and timeline for PCA to provide a clearer understanding of their practices, thereby supporting the oversight of their authorizing district.

Pacific Coast Academy: Special Education

Context

When a charter school is its own independent LEA member of a SELPA for special education purposes, the charter school 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. A detailed guidance document from CDE dated 2017 will provide clarification for specific elements related to IDEA and charter schools (www.cde.ca.gov/sp/se/ac/spedinchartrsch.asp).

Pacific Coast Academy (PCA), previously listed as Learning Latitudes Charter School, is authorized by the Dehesa School District, but deemed a local education agency for purposes of special education with the El Dorado SELPA. Detailed responsibilities of the El Dorado SELPA and Pacific Coast are outlined in the MOU.

Data

1. Annual Performance Report (California Department of Education, Special Education Division– Pacific Coast Academy). This report is required by Individuals with Disabilities Education Improvement Act of 2004 (IDEA) (20 U.S.C. 1416(b)(2)(C)(ii) and 34 CFR 300.602) for all local education agencies including school districts, county offices of education and charter schools. There are 17 indicators that measure data relative to the complaint implementation of federal law in multiple areas such as statewide assessment, graduation rate, discipline, least restrictive environment, disproportionality and IEP compliance. This document will serve as reference within the body of the report for each charter school for which Dehesa is reviewed and is available online at www.cde.ca.gov/sp/se/ds/leadatarpts.asp.
2. Memorandum of Understanding: Dehesa School District and Learning Latitudes Charter School (Pacific Coast Academy), April 2, 2018
3. Special Education Student Information — SEIS is a web-based system that allows centralized, online access to the Individual Education Plan for all students, the management of that data, CALPADS reporting and service tracking. Its maintenance and operation are funded by the El Dorado County Charter SELPA.
4. California School Dashboard

Curriculum/State Assessment

The Annual Performance Report (2018-19) for PCA sets specific targets for the participation of students with disabilities in statewide assessment. Targets are established and monitored by CDE each year. Typically, they

are one year delayed in each annual report.

PCA did not meet the targets for participation in mathematics and English language arts statewide assessments. State targets for ELA participation were set at >95.0% with only 77.42% met. The target for math participation was >95% with only 74.19%. The state target for achievement in ELA was >14.9% with 29.17% met. This shows excellent growth in ELA. The achievement target in math was >12.6% with only 4.35%. Math is a problem area in special education in most of the schools that the consultant has reviewed across the state.

The school was identified for Performance Indicator Review (PIR) monitoring activities which was directed to the El Dorado SELPA for resolution.

Disproportionality

The school does not enroll a smaller number of students with disabilities disproportionately based on data provided through CALPADS. The identification rate 11.6% for special education was determined using the CALPADS enrollment (4,159) and SEIS (452) (it does not include pending for 35 additional students). This percentage is consistent with the statewide identification rate. This is not a risk area for Dehesa.

Policies and Procedures

The El Dorado County Charter SELPA provides a comprehensive procedural manual for special education. Additional training and ongoing support are available to the school from the SELPA.

The SELPA provides ongoing support to the charter schools in all areas of procedural support for special education.

Timelines/Compliance

The most current MOU between Pacific Coast Academy and Dehesa School District was dated June 28, 2017 and signed by the charter school, but not by the Superintendent in Dehesa. The MOU should contain the appropriate signatures and updated. This could be a risk area for the district.

On April 2, 2018 Learning Latitudes Charter School (Pacific Coast Academy) approved an MOU for membership in the El Dorado SELPA. Important distinctions in roles and responsibilities are outlined in the MOU and between Learning Latitudes Charter Schools (PCA) and the El Dorado SELPA. It emphasizes that the charter school is solely responsible for the provision of special education programs and services to eligible students enrolled in the LEA (Section 1.9). The specific focus on this responsibility is:

- The LEA is responsible for the operation of any direct educational program services.
- The LEA has the duty and authority to provide Free and Appropriate Public Education (FAPE) to individual students enrolled in the school.
- The SELPA has no duty or authority to make decisions regarding the educational programming of students enrolled in the LEA.

This language may be helpful to the Dehesa district in the oversight process.

There are no systems in place to document that services have been delivered by all special education teachers and related service providers such as speech pathologists, occupational therapists, etc. Service Tracker is available in SEIS but is not used. This is one option, but other options will satisfy the need for accountability and documentation.

Staffing

Special education staffing was verified by PCA teacher and program specialists credentials from the human

resources department. The staff is fully certified with both mild/moderate and moderate/severe disability areas, as well as general education certification.

The format for instruction is primarily independent study, but for special education students the format and level of instruction is designed around the IEP for each student. All students have equal access to the standards aligned courses and receive instruction from both general and special education teachers.

This is not a risk area for the District.

Suspension

The Annual Performance Report indicates that PCA has met the targets for discipline—they are far below the target level of <2.76% in suspensions.

This is not a risk area for the District.

Student Records

Student records are stored in a confidential and secure location under staff direction. All IEPs are maintained with the SEIS system and accurately reflect the entire population of special education students included in the combination of schools that occurred in the fall. Access to the SEIS uses confidential identification and passwords assigned by the El Dorado SELPA. All teachers have access to the records for students with disabilities through SEIS.

This is not a risk area for the District.

Oversight Checklist Risk Assessment: Low

Pacific Coast Academy: Operations/Facilities

Context

Inspire Charter School's Learning Latitudes was renamed Pacific Coast Academy as part of the restructuring last year.

Concerns

- PCA was led by Inspire to believe operations oversight is only for classrooms with students.
- No evidence in Binder Tabs 3-8 and many safety plan items are lacking info. PCA resubmitted with evidence on their church resource center on Baker Street in Costa Mesa, but the church names are inconsistent and apparently outdated in evidence.
- Resource center in Orange County, but PCA says it's responsible for San Diego area.
- PCA doesn't acknowledge that their testing sites should be included in oversight.



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

Superintendent Johnson & Dehesa School Board,

We wanted to take a moment to thank the Dehesa School District as well as the oversight team for providing Pacific Coast Academy with the invaluable feedback that has been shared. The knowledge gained through each visit has helped us to take a closer look at many of our practices and processes. We have learned so much from the experience and expertise that each member of the oversight team shared with us. This process, although not always easy, has confirmed all of the amazing things our staff and teachers do on a daily basis to serve our students and families. We have also seen the areas where we can improve, and we value that feedback just as much. It is only in seeing and accepting our shortcomings that we can truly improve and become a better school. It has been a pleasure working on this oversight process with you all.

General Response

You will notice that Provenance, Inspire Charter Schools, Inspire District Office, and Inspire are all used interchangeably by the oversight team in this report. The “Inspire” name has been used in several different organizational structures, which admittedly creates confusion. Our staff, families, and students have always identified with the “Inspire” name. Since its inception, Inspire had been operating as a network of schools. Inspire spanned across the state of California, and so many students found their home within the Inspire family. As internal structures began to change, these changes weren’t always communicated with the outside public. For this reason, many people still identify with the Inspire brand, even though they have been officially enrolled in Pacific Coast Academy, or any other network school, for several years. It was only until the 19/20 school year that, as a collective, each school within the network started to refer to their



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

official school name. It is easy to understand why some people still use the Inspire name, even when they are referring to PCA.

Inspire Charter Schools began in 2014 as one non-profit organization and, over the next few years, grew to have multiple schools under one umbrella charter management organization. Prior to July 1, 2017, Inspire Charter Schools was both the parent company and the operator of Inspire schools. However, there have been major changes to the governance and management structures of the schools that were once under the initial charter management organization.

During the 2017-2018 school year, Inspire Charter Schools worked with the Blank Rome legal team to restructure the organization to have individual charter school boards that had Inspire Charter Schools as the Sole Member Entity. At that time, all board agenda items were approved by both the charter boards and also Inspire Charter Schools' board. Also, in the 2017-2018 school year, another non-profit organization was incorporated and registered with the Secretary of State called Inspire District Office, later renamed to Provenance in 2018. Provenance has a registered DBA called Inspire Charter Services. Provenance, Inspire District Office, and Inspire Charter Services refer to one organization. Provenance (formerly Inspire District Office DBA Inspire Charter Services) and Inspire Charter Schools are two separate non-profit benefit corporations.

In the 2017-2018 school year, Inspire District Office/Provenance did not provide any support services. It was in its initial phase of existence. The Provenance organization was created to perform educational services as a vendor through a fee for service contract with each school. Provenance became the support provider for the 2018-2019 school year after both Provenance and the independent Charter School Boards approved the Services Agreement. Provenance continued as a support provider for the



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

2019-2020 school year after both Provenance and the independent Charter School Boards approved the Services Agreement.

Once the schools each had their own school boards, the purpose of the Inspire Charter Schools organization was to confirm new board members. However, in July 2019, each individual school board under Inspire Charter Schools voted to remove the sole member entity thus making Inspire Charter Schools non-operational. As of July 2019, each school has self-appointing boards. Provenance (formerly Inspire District Office DBA Inspire Charter Services) continues to exist as a separate non-profit benefit corporation that provides educational support services to charter schools through a fee for service contract, but does not operate or manage any schools.

We would like to point out that many of the references in this report no longer represent how the organization operates. This report discusses events prior to Pacific Coast Academy's inception through April 2020. There have been significant changes not only in the current school year but also since April 2020. We believe that going through the oversight process next year, when the oversight team can focus directly on our current practices and not past practices, Dehesa will see significant decreases to the risk levels of our school.

Throughout this oversight report you will notice a common thread mentioning Provenance's "control" over Pacific Coast Academy. Although many of our processes have been intertwined with Provenance and Inspire Charter Schools for years through staff, leadership, and policies, Pacific Coast Academy and its board have worked tirelessly over the past year to sever as many ties with Provenance as possible. When Inspire Charter Schools closed and Pacific Coast Academy became its own independent corporation, PCA did not have the capacity to run all of the departments



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

itself. PCA was basically a school solely composed of teachers, and Provenance was the support organization with all departmental classified staff. Our goal is to become self-sustaining this year. Already we have initiated a brand new contract with Provenance, reducing our fees from 15% to 3.35%. We have brought governance, technology, procurement, accounts payable, human resources, enrollment, records, school accountability, testing, and CALPADS into our school instead of contracting those services with Provenance. They are a working back office that employed many of the classified staff to facilitate school operations. However, board decisions are not controlled by Provenance and our school leadership is not influenced by Provenance. If they were currently operating as a management organization, PCA would not be able to negotiate a reduced rate and wind down plan. This proves that they are not making the decisions for the school, that our board and leadership does have the capacity to stand individually, and that the school leadership and board are working in the best interest of not only our students, staff, but also public policy.

PCA will contract with Provenance for one additional year to ensure transparency and accountability with the FCMAT audit. However, this is only a one year contract and we have engaged with them in a one year wind down transition plan that will terminate at the end of the 2020-2021 school year.

The suggestion of requesting a formal revision has been mentioned throughout this report. Pacific Coast Academy is dedicated to working with the Dehesa School District to revise charter petitions or MOU agreements as requested.



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

There are significant changes that have taken place since the conclusion of this oversight process, all leading in the further direction of independence and local control over all aspects of Pacific Coast Academy.

Governance Response

Pacific Coast Academy recognizes that one of our biggest areas of improvement is the lack of detail in our board minutes. After this oversight report was presented to us, we have researched the Dehesa board minutes and, moving forward, we will mimic the detail presented in those minutes. The lack of detailed board minutes led to the oversight team making assumptions that there were no conversations and no action taken by the board. Many of the areas of concern were not directly observed by the oversight team. However, the existing board minutes did not contain the detail necessary to support the fact that discussions did take place surrounding the shared employee MOU process, the criteria for selecting a new board member, as well as short term borrowing. All of these discussions took place over several board meetings, but the lack of detailed notes does not show the board's discussion or understanding of these topics.

For example, the report states *"the board did limited outreach and appeared to have no criteria for selection, and no overall goals for board composition, including needed areas of expertise."* When looking at our previous board minutes, it is observed that the discussion of future board members appears on the agenda several times throughout the year. The decision was tabled until they reached a decision. The PCA board discussed this item on 11/21/2019, 1/23/2020, and 3/5/2020 and there was an honest effort by the current board to address goals and expertise. However, our board meeting minutes lacked the details on these discussions, and only shows that it was tabled. The



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

conclusion that the oversight team came to was that these conversations did not happen when in fact they did happen several times. The meeting attended by the oversight team was the final vote for the newest board member and the discussion was limited due to the fact that there were several previous conversations and they had reached the final decision.

An additional concern was that *“the Board remains heavily influenced by Provenance.”* For the last year Provenance has not had any influence over the board. The board works with the school’s leadership. Since the oversight team concluded their visit, the PCA team has made even more improvements in the area of governance. PCA has hired an assistant director who will completely oversee the governance process, independent from Provenance. The board will only interact with this individual, and will no longer be in contact with Provenance staff.

There was a concern that the PCA board was not looking to replace expensive contracts or get alternate bids for back office providers. Due to the pending FCMAT audit, the board is not currently exploring possible alternatives to the Charter Impact contract in order to ensure full transparency, accuracy, and access to data for the FCMAT team. However, the board is looking to limit expensive Provenance services by bringing many services previously provided by Provenance internally. The report states *“The structure makes it difficult for the board to govern based on school outcomes”* and *“The significant role of Provenance in school operations and its influence over governance, combined with Provenance’s lack of transparency, undermines public policy goals.”* PCA acknowledges that expensive contracts need to be reduced, staff needs to be internal, and we are committed to ensuring that this takes place so the board can govern over not only the instructional staff but all staff that serve our school



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

and families. We are committed to bringing these departments internal so that there is more transparency and our school meets all public policy goals.

The last concern we would like to address is that the oversight team noted the PCA board is inexperienced. The Pacific Coast Academy board was trained on the Brown Act, Fiscal Policies, School Finance, and Charter School Legislation September 21, 2019. These training sessions were presented by both financial experts and legal experts. However, the board might be interested in a more comprehensive training plan. PCA will be exploring outside contractors to perform further training and development. Once the board decides on a comprehensive training plan, PCA will disclose the approved contract and timeline to Dehesa. Although they had very little board experience before joining our board, they are a group of very intelligent, committed individuals with varying backgrounds. They spend countless hours reviewing policies, financials, and legal documents pertaining to the running of our school. They are always asking how they can learn more and become better in their involvement. They are taking bold steps to ensure the independence of PCA.

Business/Finance Response

Much of the Business and Finance report addresses previous practices and there has been a concerted effort to change those practices throughout the course of this school year. The most notable changes in PCA finances is as of March 2020, PCA engaged with Charter Impact so we can work with them directly. This change has had several practical implications that have completely removed Provenance from all financials. PCA leadership meets several times a week with the Charter Impact team so that PCA leadership can monitor the school's financial health and make informed decisions about cash flow, budget, and much more.



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

Pacific Coast Academy recently opened a new bank account that removed all access to Provenance and has completely stopped the use of the Master Credit Agreement. Once again the notes are sparse in the boards meeting so the team is of the conclusion that the board is unaware of these transactions. However, the master credit agreement and the amount owed to and from each school has been clearly documented and has been a part of several board meeting discussions. These financials have been part of the board financial packets and presentations. PCA is taking steps to ensure the documentation and transparency of these previous practices.

There is a recommendation to PCA to review the *“scope of work actually being done by Charter Impact and what is being done by Provenance appears redundant. Possibly save the 3% paid to Inspire by eliminating that portion of the agreement.”* The previous contract with Provenance listed all services Charter Impact provides to PCA in their contract. The oversight team indicated that we were being double charged for these services. However, this is a misunderstanding. In the initial 2019-2020 services agreement with Provenance and the school, Charter Impact’s 1.75% fee was included in the 15% fee charged by Provenance. At the time, Charter Impact was a subcontractor of Provenance. We have since removed that language from the Provenance contract, and we now contract directly with Charter Impact.

In regards to our vendors, all vendors must fill out an application and go through a defined process in order to be an approved vendor. In the past, all vendors were required to complete a DOJ clearance. No PCA student is allowed to utilize services from a non-approved vendor, and each service request is reviewed by credentialed teachers to ensure that the request meets the needs of the student’s educational plan.



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

The oversight team suggested that *“PCA should review specific costs of the type of support they are paying for via the 15% of revenues.”* We have spent a significant amount of time reviewing our current contract with Provenance and negotiated a new contract. The new rate is 3.35% and a clear, concise, and greatly reduced list of services is included.

The oversight team noted that a *“review by PCA to see what precisely is being provided by Inspire most likely will reveal that PCA would be more effective if they hire staff to replace much of the work that's listed in their agreements with Inspire.”* and *“At some point, the economy of scale argument for back office support goes away when a charter grows to become a very large charter with over 2,000 ADA. That review by the charter seems necessary now.”* PCA completely agrees, and that is exactly what we did this year. We have hired over 50 new staff members in order to replace the existing services previously provided by Provenance. We will be bringing the following departments directly into the school: enrollment, procurement, records, testing and assessment, CALPADS, human resources, school accountability, high school support, and technology. We will continue to limit our services with Provenance throughout the year and plan to move the rest of our operations internally for the 2021-2022 school year.

One of the most valuable aspects that a contract with Provenance provides is access to several operational systems for procurement, field trips, curriculum, and vendor documentation. The oversight committee noted, *“If PCA is committed to sticking with the Inspire EOS system, they could ask for a cost quote from Inspire for a subscription service fee amount per student for use of the student.”* There are several systems that are provided by Provenance that our families utilize. Each one we would need to



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

contract separately. However, we are looking to contract with another procurement system which will be ready for rollover mid-year in the 2020-2021 school year. In the 2021-2022 school year, we will no longer be contracting with Provenance, and we have a wind down transition plan that will include the use of a separate procurement system.

Personnel Responses

Prior to the beginning of this school year, PCA was housing many teachers from across the network of Inspire schools. Inspire started as a charter management organization called Inspire Charter Schools with shared staff working for one non-profit serving multiple schools. Given that each school in the former Inspire network shifted abruptly to operating independently in the 2019-2020 school year, the Leased Teacher MOU agreement was a solution proposed by our legal counsel and presented to the PCA board to account for staff members who served students in multiple schools given the new governance structure. The board approved the first version of the MOU on October 24, 2019. The goal is to align staff to a single school in the 2020-2021 school year, but this could not be fully implemented in the 2019-2020 school year without major disruption to students.

The oversight committee made the following recommendation regarding personnel:

“The Governing Board should approve personnel actions.” Although this is not required at this time by charter law, the school recognizes that this is a best practice. The 2020-2021 budget being presented to our board includes position control. Pacific Coast Academy will have internal human resources functions in the 2020-2021 school year to consistently monitor credentials, TB clearance, EL certification, and staff compliance. Incidence of leased homeschool teachers will be eliminated in the 2020-2021 school year.



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

Educational Program Response

Pacific Coast Academy prides itself on offering students a multitude of educational choices, focused on rigor, flexibility, and individualization. We were so happy to share all of the unique and program specific aspects of our school with the oversight team. We received immensely positive feedback and we will continue striving for educational excellence. We did, however, want to address the concerns brought forward in the report in the areas of shared high school staff and servicing EL students.

English Learner development is an area that Pacific Coast Academy is working to improve for the next school year. We have hired a director who will oversee the EL department. They will ensure that adequate funds have been allocated to improving our EL program, which will be tracked in our LCAP. Our number of EL classes and EL offerings will be increased, ensuring that students receive the 30 minutes of EL instruction they need each day. Being an independent study school, many of our offerings are provided through instructional software, however, we will be creating more opportunities for our EL students to interact face to face next year.

The oversight team indicated that when students choose an online pathway, the teachers providing some of the courses for core content areas may not be Pacific Coast Academy teachers but instead are in the Inspire Charter School Network, not directly overseen by PCA. No teachers are employed by Inspire Charter Schools Network, as no such entity exists. Some teachers may be employed by one charter and servicing students in PCA through the Leased Teacher MOU.



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

Content area teachers (HQTs) are either employed by PCA or they are leased to PCA by another school. Pacific Coast Academy supervises the Leased Employees' activities to ensure they are meeting their performance obligations and provide input for their annual evaluations. These teachers are employees of PCA while they are serving PCA students.

The credentialed teacher is responsible for designing the student's educational plan and monitoring the student's progress. Any services performed by vendors are approved by the student's teacher.

Content area teachers are in addition to the student's homeschool teacher (or homeroom teacher). The homeschool teacher's responsibility is to ensure student progress is being made in all subject areas.

The homeschool teacher (homeroom) remains the teacher of record and ensures students receive their assignments, grades, and make progress with their academic work. In addition, all high school students have access to highly qualified single-subject credentialed teachers who are experts in their content area. Students have access to highly qualified single-subject credentialed teachers in math, English, science, history, Spanish, French, and art.

Special Education Response

We would like to thank the oversight committee for examining the work we do to serve students with special education needs. We are very proud of our innovative, customized, and thorough program. Our staff will strive to implement strategies geared toward increasing participation and performance on state assessments of students with



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

unique needs. We will continue to work with our SELPA to maintain our high quality of service and our risk level low to the district.

Facilities/Operations

The oversight team has expressed concern with the lack of documentation that was provided regarding facilities. As a non-classroom-based school, aside from our resource center in Costa Mesa, Pacific Coast Academy does not have facilities where staff or students report. We rent facilities once a year to meet the state testing requirement. Teacher-Parent-Student meetings occur at a mutually-agreed upon location such as a library, coffee shop, or the family home, and the parent accompanies and supervises the student when Teacher-Parent-Student meetings occur.

However, the oversight checklist asked for inspection reports certifying facilities are free from mold and hazardous substances, facilities meet ADA requirements, facility restrooms are designated as all-gender, facilities have an asbestos management plan, a certificate of occupancy, and safety inspection. Our legal counsel indicated as a non-classroom-based school, these checklist items would be considered mostly not applicable. When we met with the acting superintendent and Dehesa's legal counsel in September 2019 at the start of the oversight process, they indicated that some of the checklist items would not be applicable to our non-classroom-based school model. Next year, PCA will submit all testing location contracts to the oversight team. However, due to COVID-19, no testing locations were used during the 2019-2020 school year.

Closing

Again, we wanted to thank the Dehesa School District, as well as the oversight team, for taking the time and care to partner with us and to help us improve. We wanted to



Pacific Coast Academy

13915 Danielson St. #103, Poway, CA 92064

Ph (619) 404-3190

especially thank Superintendent Johnson for going above and beyond in support of our school and our move toward independence and quality. Pacific Coast Academy has a clear path for improvement and we can't wait to see what the next year brings.

Thank you for your time,

Krystin Demofonte

Krystin Demofonte

Executive Director

Pacific Coast Academy

Pacific Coast Academy

Pacific Coast Academy: Governance

BINDER 3: GOVERNANCE DOCUMENTATION PACIFIC COAST ACADEMY (INSPIRE)			
Tab	Description	Compliance Area(s)	Provided?
1.	Articles of Incorporation	G1	Y
2.	Bylaws	G1-G4, G6, G12	Y
3.	Approved Charter	G3, G6, G8, G12	Y
4.	Most Recent School Leader Evaluation	G5	N (scheduled 5/21/2020)
5.	List of Board Members	G7-G8	Y
6.	Board Member Biographies	G9-G11	Y
7.	Description of School and Community Demographics	G9	Y
8.	Completed Form 700s for Board Members and Leadership	G11	Y
9.	Annual Board Meeting Calendar	G12	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Tab	Description	Compliance Area(s)	Provided?
10.	Sign-in Sheet(s) from Brown Act Training	G13	Y (letter)
11.	Three Most Recent Board Meeting Agendas	G14-G15	Y
12.	Screenshot of Website with Posted Agenda	G14	Y
13.	Public Comment Description/Policy	G15	Y
14.	Three Most Recent Board Meeting Minutes	G16	Y
15.	Screenshot of Website with Posted Minutes	G16	Y
16.	Board Meeting Minutes Reflecting Review of Compliance with Education Code Section 49431.9 (Prohibiting Food/Beverage Advertisements)	G17	N/A (no food program)
17.	Parent Handbook	G18	Y
18.	Student Handbook	G18	Y
19.	Employee Handbook	G18	Y
20.	Complete Set of Board Policies	G19-G30, G39	Y
21.	Memorandum of Understanding	G38	Y

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

Assigned District Staff:

Gail Greely

Position of Assigned Staff Person:

Governance Lead

PACIFIC COAST ACADEMY GOVERNANCE OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Organizational Management</u>					
G1	If charter school is organized as a nonprofit corporation, the corporate papers are available to the authorizer.	<input type="checkbox"/> Articles of Incorporation (Binder 3, Tab 1) <input type="checkbox"/> Bylaws (Binder 3, Tab 2)	X		
G2	Bylaws are comprehensive, with provisions regarding governing board composition, term limits, powers, meetings, committees, officers, etc.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	Bylaws were revised in August 2019 but remain inconsistent with current law applicable to charter schools (e.g., action without meetings and interested persons as directors).
G3	Any changes to charter or bylaws have been approved by charter school's governing board and submitted to the authorizer.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)		X	Authorizer was not informed of changes to governance structure made through amended bylaws.
G4	There is a clear distinction between responsibilities of governing board and administration.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2)		X	Despite elimination of sole statutory member, Provenance (renamed from IDO) continues to strongly influence decision-making. Shared senior staff and contracts for services and staff diminish role of board, and its ability to hold leadership accountable for school outcomes.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G5	Governing board has a robust process for evaluating the charter school leader.	<input type="checkbox"/> Most recent charter school leader evaluation (Binder 3, Tab 4)		X	No evidence of governing board evaluation of school leadership at any level. Although org chart in charter shows board above the Executive Director, Deputy Executive Director and Regional Director, these positions are shared with other schools. Unclear if board has any role in selection and evaluation of these school leaders.
G6	There is a process in place that ensures parents, teachers, and other staff provide input regarding the effectiveness of the charter school.	<input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3) <input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q2) <input type="checkbox"/> Teacher interview (Binder 1, Tab 4, Q1)	X		Charter says that one board of director position will be reserved for parent or community member, but no process is specified. A new board member was added in March 2020, but there was limited recruitment and no established criteria for selection. Charter calls for Parent Teacher Organization as part of parent teacher participation in governance, but no PTOs since closure of "Enrichment Academies".
Composition					
G7	Charter school has a list or roster of governing board members.	<input type="checkbox"/> List of board members (Binder 3, Tab 5)	X		Not on website
G8	Composition of governing board is consistent with approved charter.	<input type="checkbox"/> List of board members (Binder 3, Tab 5) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)		X	Charter does not address board selection or composition except to identify one member as a community rep. Has not been revised to reflect elimination of sole statutory member. Recent appointment of board community rep was consistent, but process included minimal outreach and no clear criteria.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G9	Governing board is diverse and reflects charter school and community population.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Description of school and community demographics (Binder 3, Tab 7)	X		Board would benefit from increased racial/ethnic diversity to reflect student population.
G10	Governing board members have experience in key areas, such as education, finance, legal, real estate, and fundraising.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6)		X	All board members have education backgrounds; some business background. No other fields and nothing in charter or policy regarding board development. Bios of board members not on website.
G11	Governing board and charter leadership are free of real and perceived conflicts of interest.	<input type="checkbox"/> Board member biographies (Binder 3, Tab 6) <input type="checkbox"/> Completed Form 700s (Binder 3, Tab 8)	X		Unknown as to related entities Inspire Charter Schools and Provenance.
Meetings					
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.	<input type="checkbox"/> Annual governing board meeting calendar (Binder 3, Tab 9) <input type="checkbox"/> Bylaws (Binder 3, Tab 2) <input type="checkbox"/> Approved charter (Binder 3, Tab 3)	X		Multiple short special meetings in second half of 2019 evidence of lack of plan for governance transition.
G13	Governing board members receive annual training regarding Brown Act requirements.	<input type="checkbox"/> Sign-in sheet from Brown Act training (Binder 3, Tab 10)		X	Brown Act training received in 2019; no documentation to establish whether annual. Charter commits to initial training and training for new members – not annual.
G14	Meetings are noticed in accordance with the Brown Act.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 12)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G15	Governing board has adopted clear public comment policy, including allowance of twice the time limit for non-English-speaker translation.	<input type="checkbox"/> Sample meeting agendas (Binder 3, Tab 11) <input type="checkbox"/> Public comment policy (Binder 3, Tab 13)		X	Policy stated on published agenda does not include additional time for non-English speakers.
G16	Minutes are approved and thereafter made available to the public.	<input type="checkbox"/> Sample meeting minutes (Binder 3, Tab 14) <input type="checkbox"/> Screenshot of charter school website (Binder 3, Tab 15)	X		Minutes are extremely sparse – reflecting either a lack of questioning and discussion by the board members (as observed) or failure to follow best practice in documenting that the board deliberated carefully before taking the vote.
G17	Governing board annually reviews charter school’s compliance with Education Code section 49431.9, which prohibits advertisement of food or beverages.	<input type="checkbox"/> Board meeting minutes (Binder 3, Tab 16)			N/A
Board Policies					
G18	Governing board has adopted parent, student, and employee handbooks, and makes updates to handbooks as needed.	<input type="checkbox"/> Parent handbook (Binder 3, Tab 17) <input type="checkbox"/> Student handbook (Binder 3, Tab 18) <input type="checkbox"/> Employee handbook (Binder 3, Tab 19)	X		
G19	Governing board has adopted policies related to conflict of interest.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G20	Governing board has adopted policies related to student discipline and due process.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G21	Governing board has adopted policies related to complaints and investigations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G22	Governing board has adopted internal control policies (and related forms and systems).	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G23	Governing board has adopted policies related to bank signature authorizations.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G24	Governing board has adopted policies related to allowable purchases and purchasing authority.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G25	Governing board has adopted policies related to student harassment and the prevention of acts of bullying, including cyberbullying.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G26	Governing board has adopted policies related to employee harassment.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G27	Governing board has adopted and annually updates its safety plan to include all legal requirements applicable to charter schools.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G28	Governing board has adopted policies related to immunization records.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)		X	Enrollment process requires immunization record, but unable to locate specific immunization policy. Charter says school is "waiting for the California Department of Education to release clarification and guidelines on how non-classroom based schools should apply SB277".
G29	Governing board has adopted policies related to Family Educational Rights and Privacy Act.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
G30	Governing board has adopted policies related to Section 504/IDEA compliance.	<input type="checkbox"/> Board policies (Binder 3, Tab 20)	X		
Education Code Assurances					
G31	Charter school has complied with assurance that it shall be nonsectarian in program admission policies, employment practices, and all other operations.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q3)			
G32	Charter school has complied with assurance that it shall not charge tuition.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q4)			
G33	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q5)			

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G34	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).	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q6)			
G35	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q7)			
G36	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.	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q8)			

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
G37	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	<input type="checkbox"/> Executive director (or equivalent) interview (Binder 1, Tab 3, Q9)			
Memorandum of Understanding					
G38	Charter school has complied with terms of current memorandum of understanding, if applicable.	<input type="checkbox"/> Memorandum of understanding (Binder 3, Tab 21)		X	MOU does not include a specific provision regarding material revision of the charter but change of governance would qualify as material.
Complaint Policies & Procedures					
G39	Board has adopted policies by which students, parents, and staff may make complaints, and these procedures are posted in every classroom.	<input type="checkbox"/> Board policies (Binder 3, Tab 20) <input type="checkbox"/> Observation of classrooms (Binder 1, Tab 10, Q5)			
G40	Complaint policies and procedures are available in the main/front office.	<input type="checkbox"/> Observation of main office (Binder 1, Tab 11, Q1)			
Total "No" Responses: 10					
Risk Assessment: 0-10 Low 11-20 Moderate 21+ High					

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

PACIFIC COAST ACADEMY FINANCE/BUSINESS OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Budget, Accounting, and Financial Reporting</u>					
F1	Governing board policies address budget, accounting, and financial reporting.	<input type="checkbox"/> Board policies (Binder 6, Tab 1)	√	<input type="checkbox"/>	Board Policies provided via Binder 6 (Finance & Business) component of DCOT review process. The Policies provided seem reasonable for business/finance operations. However, after interviews, research, analysis of various financial reports, it is apparent the Board is unaware of many major financial decisions and transfers related to the operation of the charter school. Big question regarding relationship with Inspire District Office and its influence in fiscal decisions of the charter school. Examples of major decisions the Board is apparently unaware of: Leased Teacher MOU payroll transfers over \$8.1 during the period of July 2019 thru December 2019. Question regarding action of Inspire DO acting as Board/Agent of participating schools to get approval for a \$50M Revenue Note Financing Agreement for Pacific Coast Charter School as well as three other Inspire DO supported charters schools (Feather Mtn., Eagle Crest, Mission Vista) Red Flag regarding who truly is providing fiscal decision making for the charter school. The

No.	Compliance Area	Evidence to Review	Yes	No	Comments
					significant fiscal events described above appear to be evidence the Board does not oversee the financial resources of the charter
F2	Current budget has been approved by the governing board.	<input type="checkbox"/> Current/adopted budget (Binder 6, Tab 2) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 3)	✓	<input type="checkbox"/>	Original Budget Board approved at June 2019 Meeting. 2nd Interim recently approved. Budget format via state SACS reporting Fiscal presentations provided by Charter Impact staff to Board during meetings Payroll Transfers back and forth between IDO supported charter schools Huge ADA swings from Adopted Budget to 1st Interim Budget. Interfund or Intercompany transfers between IDO supported charters not approved by Board
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.	<input type="checkbox"/> Board meeting minutes (Binder 6, Tab 4) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q3)	✓	✓	Budget reviewed by Board during appropriate timeline for approvals Narrative on budget provided by Charter Impact staff. Appears to be a lack of fiscal working knowledge of Board and Principal I.e. Typically Board Resolution provided for Intercompany (fund) transfers. No Board approval of significant payroll xfers for teachers (\$8.1M & 497 Staff). Huge ADA swing (954 ADA) from Adopted budget to July & Sept Updates adopted Budget ADA: 3,314, July Update ADA: 3,927.84, 2nd Interim Update: 4,068.00 ADA No evidence of Board approval of 2018-19 UAs. Report was completed and sent to authorizer
F4	Budget aligns with charter school's current LCAP or	<input type="checkbox"/> Current budget (Binder 6, Tab 2) <input type="checkbox"/> LCAP/LCAP update (Binder 6, Tab 4)	✓	<input type="checkbox"/>	For the budget provided, aligned

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	update to LCAP.				with LCAP. Question re: calculations of Instructional related expenditures
F5	Budget provides for all financial obligations.	<input type="checkbox"/> Current budget (Binder 6, Tab 2)	√	√	<p>Budget and budget updates provides latest projections and current fiscal status</p> <p>Budget, Interim Reports provided via SACS format. MYP provided at each required reporting period (Budget, 1st/2nd Interim)</p> <p>Financial Obligation detail provided via state account code structure. Due to/from Transfer budget and process needs more transparency</p> <p>Significant Payroll Transfers throughout the year needs more transparency. Leased Teacher MOU Agreement and related payroll transfers create possibility for unknown obligations due to the agreement with all 14 Inspire District Office supported charter schools.</p>
F6	Governing board approves all required financial reports.	<input type="checkbox"/> Required financial reports (Binder 6, Tab 5) <input type="checkbox"/> Board meeting minutes (Binder 6, Tab 6)	√	<input type="checkbox"/>	Meeting minutes provided evidence of approval of all required financial reports
F7	On or before July 1st, the charter school submits the adopted budget and estimated current year actuals to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 7)	√	<input type="checkbox"/>	Budget approved by Board during June 2019 meeting. Estimated actuals included in reporting
F8	On or before December 15th, the charter school submits the interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 8)	√	<input type="checkbox"/>	Received by authorizing district
F9	On or before March 15th, the charter school submits the second interim financial report to the authorizer.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 9)	√	<input type="checkbox"/>	Received by authorizing district

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F10	On or before September 15th, the charter school submits the final unaudited actuals report for the full prior year.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 10)	√	√	E-mail from Clara Yi of Charter Impact to district. District received copy of Unaudited Actuals Report. No record of Board approval of UA's.
F11	Charter school maintains separate accounts for restricted revenues and expenditures.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	Every fiscal report or budget report for school reviewed separated restricted revenues and expenditures
F12	Charter school regularly prepares cash flow projections to ensure that it has sufficient funds to meet its financial obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5)	√	<input type="checkbox"/>	Cash flow projections are regularly prepared at Budget, and Interim Reporting Periods.
F13	Charter school's business accounting system complies with state accounting and reporting requirements.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q4)	√	<input type="checkbox"/>	Accounting/Financial reports comply with state accounting reporting requirements, SACS
<u>Audit</u>					
F14	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.	<input type="checkbox"/> Proof of submission of auditor certification and contract (Binder 6, Tab 11) <input type="checkbox"/> Director of finance (or equivalent) interview ((Binder 1, Tab 2, Q5)	√	<input type="checkbox"/>	Report was provided to Authorizer. No Deficiencies reported from Auditor Wilkinson/Hadley Audit Firm
F15	Charter school has developed auditing schedule/timeline.	<input type="checkbox"/> Auditing schedule/timeline (Binder 6, Tab 12)	√	<input type="checkbox"/>	Summary from Auditor provided
F16	Charter school has submitted prior year's financial audit to authorizer.	<input type="checkbox"/> Previous year's audit (Binder 6, Tab 13) <input type="checkbox"/> Proof of submission (Binder 6, Tab 14)	√	<input type="checkbox"/>	UA's received during interview meetings
F17	Charter school has developed and implemented corrective plan of action for each audit finding and recommendation, as applicable.	<input type="checkbox"/> Corrective plan of action (Binder 6, Tab 15) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q6)	√	<input type="checkbox"/>	No deficiencies noted by auditor. N/A
<u>Financial Condition</u>					

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F18	Charter school maintains an appropriate level of reserves for economic uncertainties.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q7)	✓	<input type="checkbox"/>	Minimum reserve levels of 3%. 2.9% Designated with \$900K Unappropriated Projecting Reserves of \$1.2M on Revenue Base of \$40.7M for year
F19	Charter school prepares three-year financial projections (current plus two subsequent years) based on reasonable assumptions and includes all long-term debt obligations.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q8)	✓	<input type="checkbox"/>	Financial projections at each required reporting period (Budget, 1st/2nd Interim) always includes 3-year financial projections. Long-term debt obligations included in projections
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.	<input type="checkbox"/> Financial records (Binder 6, Tab 5) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q9)	✓	<input type="checkbox"/>	Current projections indicate charter school will be able to meet its financial obligations and retain appropriate level of reserves for current and 2 future years
<u>Cash Receipts</u>					
F21	Charter school has policies addressing cash receipts.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16)	✓	<input type="checkbox"/>	Documents included in Binder 6 (Business/Finance)
F22	Charter school maintains records of all monies received (e.g., issues receipts).	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash receipts (Binder 6, Tab 17) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q10)	✓	<input type="checkbox"/>	Copies of sample records and discussion during interview provided sufficient evidence charter maintains records of all monies received
F23	Charter school deposits monies in a timely manner.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q11)	✓	<input type="checkbox"/>	Deposit statements provided evidence of sufficient process
F24	Charter school maintains records of deposits of all monies.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Sample records of cash deposits (Binder 6, Tab 18) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q12)	✓	<input type="checkbox"/>	Doc provided at interview/review meeting. All IDO Charters use Citizens Bank. Recently, charter has begun process to change bank to Wells Fargo Bank
F25	Charter school reconciles bank statements to ensure receipt and deposit of monies is accurately reported.	<input type="checkbox"/> Cash receipt policy (Binder 6, Tab 16) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q13)	✓	<input type="checkbox"/>	Documents reviewed during interviews, meetings. Bank reconciliation completed in a timely fashion

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Disbursements</u>					
F26	Charter school has policies addressing disbursements.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19)	✓	<input type="checkbox"/>	Disbursement policy included in Binder 6 (Business/Finance)
F27	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.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q14)	✓	✓	Provided Purchasing and Bank Policy Due to the nature of the Charters Purchasing, or EOS System, for student/family instruction and enrichment purchases, physical receipt is not received. Inspire DO receives copy of Amazon electronic order confirmation
F28	Checks are signed by authorized employees.	<input type="checkbox"/> Disbursement policy (Binder 6, Tab 19) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q15)	✓	<input type="checkbox"/>	At beginning of school year, Board authorized employees with signature authority
F29	Charter school has adopted a system to maintain vendor payment information for preparation of 1099s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q16)	✓	<input type="checkbox"/>	Evidence provided in Binder 6 and during interviews, meetings
F30	Charter school has segregated duties between purchasing, receiving, and accounts payable.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q17)	✓	<input type="checkbox"/>	Again, due to the EOS purchasing system and on-line ordering for the student/families, no physical receiving document is held by charter school
<u>Payroll</u>					
F31	Staff Org Chart	<input type="checkbox"/>	✓		Included in Binder 6. Vague, no reporting relationship above Principal
F32	Charter school has a salary schedule or other satisfactory salary structure.	<input type="checkbox"/> Salary schedule (Binder 6, Tab 21)	✓	<input type="checkbox"/>	Included in documents submitted. Limited Steps

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F33	Tax deposits are completed in a timely manner.	<input type="checkbox"/> Proof of tax deposits (Binder 6, Tab 22) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q18)	✓	<input type="checkbox"/>	Evidence included in Binder 6 and provided during interviews, meetings
F34	Earnings are properly recorded for retirement reporting to Social Security, PERS, STRS.	<input type="checkbox"/> Proof of recording of earnings (Binder 6, Tab 23) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q19)	✓	<input type="checkbox"/>	June 28, 2019 Stmt City Nat'l Bank Charter School Ledger demonstrated evidence of properly recorded earnings
F35	Charter school has system to provide STRS data to authorizer.	<input type="checkbox"/> Proof of submission of STRS data (Binder 6, Tab 24) <input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q20)	✓	<input type="checkbox"/>	Data submission to Authorizer and SDCOE included in Binder 6
F36	Charter school has system to maintain employee earning records for preparation of W-2s.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q21)	✓	<input type="checkbox"/>	Evidence of proper system provided via sample records included in Binder 6 as well as during interview/meetings
<u>Equipment Inventory</u>					
F37	Charter school has policies addressing the purchase and maintenance of equipment.	<input type="checkbox"/> Equipment purchase and maintenance policy (Binder 6, Tab 25)	✓	<input type="checkbox"/>	Policy provided in Binder 6 (Business/Finance)
F38	Charter school maintains an equipment inventory that is physically located on each site.	<input type="checkbox"/> Equipment inventory (Binder 6, Tab 26)	✓	<input type="checkbox"/>	Assets \$5K or more in Fixed Asset Schedule
F39	Equipment purchased with federal funds is properly identified.	<input type="checkbox"/> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q22)	✓	<input type="checkbox"/>	All restricted funds and purchases identified via separate Fed related Resource Code
<u>Student Attendance (All Schools)</u>					
F40	Charter school uses a generally approved attendance accounting system.	<input type="checkbox"/> Screenshot of attendance accounting system (Binder 6, Tab 27)	✓	<input type="checkbox"/>	Pathways is Attendance Accounting System. Reconciled Oct. 2019 ADA report by teacher, by student, by grade reports reviewed
F41	There is a designated staff person responsible for administering attendance.	<input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20)	✓	<input type="checkbox"/>	Yes. Giovanna from Inspire District Office handles Attendance Accounting; Appears very knowledgeable of attendance

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F42	Charter school calendar includes a minimum of 175 instructional days.	<input type="checkbox"/> School calendar (Binder 6, Tab 28)	√	<input type="checkbox"/>	accounting system Copy of school calendar provided in Binder 6. School Start 8/20/19, many diff student start dates
F43	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).	<input type="checkbox"/> Class/bell schedule (Binder 6, Tab 29)	√	<input type="checkbox"/>	Example of a 7-hour Day provided in Binder 6. Certification of Instructional minutes documents also provided as evidence. Instructional Lead of DCOT reviewed compliance to required minimum instructional minutes documents also provided as evidence. Instructional Lead of DCOT reviewed compliance to required minimum instructional minutes
F44	Student absences are excluded from apportionment days.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q1)	<input type="checkbox"/>	√	Received Oct. 2019 Monthly Report during interview meeting. Almost zero student absences are reported. 99.8% Overall ADA Yield to Enrollment
F45	Charter school only claims ADA for teachers who hold an appropriate credential or certificate.	<input type="checkbox"/> Attendance reports (Binder 6, Tab 30) <input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q2)	√		Total teacher count on ADA report did NOT reconcile to Payroll or Credential lists given Over 400 Teaching staff included in Oct. 2019 Attendance Report. Yet, only approx. 200 certificated staff names provided as roster of Teacher of Record Credential List & Payroll Teacher GL list. Over 200 teacher discrepancy between claimed ADA report and the other teacher listing reports for school
F46	Charter school submits P1, P2, and P3 attendance reports to authorizer, along with back-up documents.	<input type="checkbox"/> Proof of submission (Binder 6, Tab 31)	√	<input type="checkbox"/>	Copies of required state attendance reports received by authorizer with back-up 99.8% ADA Yield to Enrollment. Appears unreasonable almost all students have 100%

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F47	Charter school has clear procedures for enrolling students, and confirming that students are not enrolled elsewhere to avoid dual enrollment.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	✓	✓	attendance Procedure for enrolling students received. However, unable to verify students are not enrolled elsewhere or have dual enrollment due to significant number of teacher transfers and the related student claimed ADA associated with those transfers
F48	Charter school has clear procedures for disenrolling students and providing notification to the student's district of residence.	<input type="checkbox"/> Enrollment and disenrollment policies and procedures (Binder 6, Tab 32)	✓	<input type="checkbox"/>	Reviewed by Instructional Lead of DCOT. Procedure noted as received. Again, same issue related to teacher transfers noted above in item 47 applies
F49	Charter school has clear procedures for claiming and reporting ADA to the state.	<input type="checkbox"/> Policies and procedures related to claiming and reporting ADA (Binder 6, Tab 33)	✓	✓	Policies for claiming ADA to the state appear clear. Claiming of ADA reconciled via student learning logs, work samples and teacher verification. However, the issue of significant number of related ADA to teacher transfers unable to be verified.
F50	Charter school ensures that students are not enrolled in more than one track for which it claims apportionment.	<input type="checkbox"/> Attendance clerk (or equivalent) interview (Binder 1, Tab 6, Q3)	✓	✓	Unsure. Difficult to verify unless all students can be reviewed for all 14 Inspire DO supported Charter Schools due to the significant amount of Teacher Transfers and Leased Teachers via a Leased Teacher MOU with all 14 Charters

Student Attendance (Schools Offering Independent Study)

F51	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).	<input type="checkbox"/> Certification (Binder 6, Tab 34) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q1)	✓	<input type="checkbox"/>	Per Instructional Lead on DCOT, rigor verified as similar as classroom-based school
F52	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	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q1)	✓	<input type="checkbox"/>	Per Instructional Lead on DCOT, evidence provided of in person communication at least twice per

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
F53	section 51749.5(a)(7). 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).	<input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q1) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q2) <input type="checkbox"/> Sample grade books (Binder 6, Tab 35) <input type="checkbox"/> Sample transcripts (Binder 6, Tab 36) <input type="checkbox"/> Work samples (Binder 6, Tab 37) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q2)	✓	<input type="checkbox"/>	month as well as work samples provided during review Received samples of Grade Books, transcripts and student work during interview. Samples included initialed by supervising teacher of appropriate work product. Instructional Lead for the DCOT verified appropriateness of work sample credit given
F54	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).	<input type="checkbox"/> List of course offerings (Binder 6, Tab 38)	✓	<input type="checkbox"/>	Course listings provided in Binder. Instructional Lead for DCOT confirmed appropriateness of course offerings
F55	The program of each student in independent study is overseen by a certificated employee.	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q4) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q3)	✓	✓	Due to the significant number of teacher transfers into charter school and related staff not included in certificate "teacher of record" lists, unable to verify this is the case unless all Inspire DO supported charters taking part in Leased Teacher MOU are reviewed
F56	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).	<input type="checkbox"/> Student enrollment report (Binder 6, Tab 39) <input type="checkbox"/> Staff organizational chart (Binder 6, Tab 20) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q2) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q4)	✓	✓	Review of data given appears to meet ratios. Again, unable to completely verify due to the significant amount of teacher, and thus ADA transfers, between all Inspire DO sponsored charter schools.
F57	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	<input type="checkbox"/> Board policy (Binder 6, Tab 40) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q5) <input type="checkbox"/> Independent study teacher interview	✓	<input type="checkbox"/>	Policy elaborating on max length of time allowed between IS assignment and completion of assignment noted. Instructional Lead of DCOT

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	completion.	(Binder 1, Tab 9, Q5)			reviewed appropriateness of said policy
F58	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.	<input type="checkbox"/> Board policy (Binder 6, Tab 41) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q6) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q6)	✓	<input type="checkbox"/>	Policy detailing number of missed assignments allowed before school conducts eval to decide if student should continue in an IS program noted. Instructional Lead of DCOT reviewed appropriateness of policy
F59	Current written agreement is on file for each independent study student that contains the information required by Education Code section 51747(c).	<input type="checkbox"/> Sample agreements (Binder 6, Tab 42) <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q7) <input type="checkbox"/> Independent study teacher interview (Binder 1, Tab 9, Q7)	✓	<input type="checkbox"/>	Received copies of sample enrollment agreements during interviews, meetings. Samples provided gave evidence agreements are on file for each student
F60	Students with IEPs do not participate in independent study unless their IEPs provide for that placement.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q3)	✓	<input type="checkbox"/>	Confirmed by Special Education Lead of DCOT students do not participate in IS unless it's provided for in the student's IEP
561	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).	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q4)	✓	<input type="checkbox"/>	Only independent study students attend the charter. Appropriateness reviewed by Educational Program Lead of DCOT
F62	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.	<input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q5)	✓	✓	Per samples reviewed, only students that are residents in county where apportionment claim is reported, or residents of a county immediately adjacent to the county in which an apportionment is reported are claimed. Though, no review was completed related to students transferred into charter via Teacher and thus ADA transfers
F63	Charter school maintains daily/hourly attendance credit register (separate from classroom attendance	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7,	✓	<input type="checkbox"/>	Received sample register and work sample docs during interview/visit Instructional review for ADA recording

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
	records) on a current basis as time values of student work products are evaluated by certificated teachers.	<p>Q6)</p> <input type="checkbox"/> Independent study parent interview (Binder 1, Tab 8, Q8)			completed by Instruction lead. Samples indicated attendance credit maintained on a daily basis. Although, due to the teacher transfer issue, cannot guarantee all products are evaluated by a certificated teacher
F64	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.	<input type="checkbox"/> Credit register (Binder 6, Tab 43) <input type="checkbox"/> Independent study coordinator (or equivalent) interview (Binder 1, Tab 7, Q7)	✓	<input type="checkbox"/>	Instructional review of claiming appropriateness conducted by Instructional Lead of DCOT. Samples of student work provided during interviews/meetings and reviewed
F65	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 type="checkbox"/> Request for determination of funding (Binder 6, Tab 44) <input type="checkbox"/> SBE determination of funding (Binder 6, Tab 45)	✓	<input type="checkbox"/>	Copy of Request of Determination Funding Form provided
F66	SBE Issued determination of funding correspondence	<input type="checkbox"/>	✓		SBE Issued determination of funding correspondence included in Binder 6
<p><i>If school does offer independent study:</i> Total "No" Responses: 13 _ Risk Assessment: 0-16 Low 17-32 Moderate 33+ High</p>					

815-21/4533779.4

PACIFIC COAST ACADEMY PERSONNEL OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
All Employees					
P1	Charter school employee handbook and policies are consistent with approved charter and any MOUs.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 0-N/A 	✓	•	Charter approval 2019-2024 Concern: MOU - Leased Teachers with ALL Inspire charter school.
P2	Charter school employee handbook and policies guarantee fair hiring practices.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) Employee policies (Binder 5, Tab 2) 	✓	•	Extensive Employee Handbook
P3	Charter school enters employment contracts with all persons hired to work at school.	<ul style="list-style-type: none"> Sample employment contracts (Binder 5, Tab 5) 3 Samples 	✓	•	3 employment contract samples of Home School Teachers
P4	All employees have been fingerprinted, including Department of Justice background checks.	<ul style="list-style-type: none"> Documentation of fingerprint clearance for all employees (Binder 5, Tab 6) 	✓	•	227 employees listed with DOJ clearance dates At site visit - received new list of 225 employees
P5	All employees have passed the TB test and results are current.	<ul style="list-style-type: none"> Documentation of current TB test results for all employees (Binder 5, Tab 7) 	✓	✓	230 employer TB verifications. 18 expired. 5 not verified At site visit - new list 225 employees. 2 expired TB.
P6	All employees have undergone AB 1432 Child Abuse Neglect and Reporting training within first 6 weeks of school or 6 weeks of employment.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 8) 	✓	•	236 certificates At site visit - new list 225 employees - All completed
P7	If a charter school employs 50+ employees, all supervisors have undergone anti-harassment training, including harassment based on sexual orientation and gender identity and expression.	<ul style="list-style-type: none"> Certificates of training (Binder 5, Tab 9) 	✓	✓	231 certificates for Non-managers At site visit - new list Managers only. 1 not complete: Bischalaney, Jessica
P8	Charter school has DFEH poster regarding transgender rights posted in a prominent and accessible location.	<ul style="list-style-type: none"> Observation of main office (Binder 1, Tab 11, Q4) 	✓	•	At Azusa Main Office site.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

P9	If charter school employs 20+ employees, it provides up to 12 weeks of job-protected, unpaid parental leave.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 	✓	Employee Handbook pg 30- Leaves PTO earned sick leave pg 40
P10	If charter school employs 25+ employees, it provides protected leave and sick leave as it pertains to child and relative care laws.	<ul style="list-style-type: none"> Employee handbook (Binder 5, Tab 1) 	✓	Employee Handbook pg 31 - Leaves
P11	Governing board approves personnel actions.	<ul style="list-style-type: none"> Governing board minutes (Binder 5, Tab 10) 	✓	No personnel actions listed for board to approve
Certified Employees				
P12	Charter school employs sufficient teaching staff to satisfy terms of approved charter and applicable law.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	Approved Charter-2017-2023. No teachers on Org chart. Did not receive a list of teachers/with students. Concern: Leased Teacher MOU with all Inspire Charter schools?
P13	Charter school provides teachers with professional development opportunities.	<ul style="list-style-type: none"> Professional development calendar (Binder 5, Tab 12) Professional development session agenda (Binder 5, Tab 13) Teacher interview (Binder 1, Tab 4, Q2) 	✓	Professional Dev plan 19-20 Monthly. Trainings Calendar - Not sure what Trainings are (Oct-Dec 2019) No calendar dates. At site visit - Trainings were explained (online) Added PD monthly calendar and more specific information - OK
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.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by core teachers (Binder 5, Tab 14) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	177 teachers (in binder) 5 teachers had expired credentials. At site visit given 2 more lists #2 - 116 teachers. Another new list #3 218 teachers. This list all teachers had credentials for core assignments
P15	Teachers have the legally required CLAD or B-CLAD certification to provide instruction to their students.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of credentials and certifications held by teachers (Binder 5, Tab 15) 	✓	List of 144 teachers (in binder) at site visit New list of 218 teachers. Rechecked-not all teachers had EL authorizations. List was confusing and had Adm and Service staff. #1 need an accurate list of teachers to review #2 need a plan for all teachers to hold an EL authorization.
P16	Teachers providing special education and related services have required credentials and certifications.	<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) 	✓	43 teachers (in binder). At site visit- new list. 60 teachers. Rechecked all had special ed credentials.

			<ul style="list-style-type: none"> Documentation of credentials and certifications held by special education teachers (Binder 5, Tab 16) Sample evaluations (Binder 5, Tab 17) Teacher interview (Binder 1, Tab 4, Q3) 	✓	•	3 samples. Teacher interview completed at site visit. Lead teacher
<u>Classified Employees</u>						
P17	Charter school leadership conducts regularly, timely evaluations of teachers.		<ul style="list-style-type: none"> Staff organizational chart (Binder 5, Tab 11) Documentation of qualifications held by classified aides (Binder 5, Tab 18) Approved charter (Binder 5, Tab 3) Employment-related MOUs (Binder 5, Tab 4) 	✓	•	No info in T-18 Received new classified staff list to review documentation. 5 Staff had college degrees or working towards credentials. OK
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.					
Total "No" Responses: <u>5</u> - Moderate 3/5/20/Cynthia Free DCOT/HR Risk Assessment (Circle One): 0-4 Low 5-8 Moderate 9+ High						

815-21/4533780.4

Pacific Coast Academy: Educational Program

Assigned District Staff Person: Linda Kimball
 Position of Assigned Staff Person: Educational Program Lead
PACIFIC COAST ACADEMY EDUCATIONAL PROGRAM OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) 	✓	<input type="checkbox"/>	
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q1) 	✓	<input type="checkbox"/>	
E3	Charter school staffing complies with approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Staffing chart (Binder 2, Tab 3) 	✓	<input type="checkbox"/>	Staffing
E4	Charter school staffing is sufficient to carry out educational program.	<ul style="list-style-type: none"> Staffing chart (Binder 2, Tab 3) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q2) 	<input type="checkbox"/>	✓	The staff at Pacific Coast is insufficient to oversee the vendors assigned to students in their program. And, by design they do not directly oversee many of the high school teachers, who are employed by others. Without direct (high school teachers) or sufficient (vendors) oversight, we cannot assert staffing is sufficient to carry out the program.
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.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) 	✓	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Ψ&σ	No	Comments
E6	Charter school has obtained WASC accreditation, if applicable.	<ul style="list-style-type: none"> WASC accreditation (Binder 2, Tab 5) 	√	<input type="checkbox"/>	
Services to Special Populations					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q4) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) SELPA policies and procedures manual (Binder 2, Tab 6) CALPADS reports for Fall 1 submission (Binder 2, Tab 7) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q5) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> Sample IEPs (Binder 2, Tab 8) Sample 504 plans (Binder 2, Tab 9) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed
E11	All required members of IEP teams attend IEP meetings.	<ul style="list-style-type: none"> Sample IEPs (Binder 2, Tab 8) 	√	<input type="checkbox"/>	Special Ed

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<ul style="list-style-type: none"> Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed
E13	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"> Director of finance (or equivalent) interview (Binder 1, Tab 2, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	Special Ed
E14	Charter school follows process for identification and reclassification of students who are English Learners.	<ul style="list-style-type: none"> Student handbook (Binder 2, Tab 4) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q7) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Although there is evidence of reclassification in the past, this process was not completed this year.
E15	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"> Student handbook (Binder 2, Tab 4) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q8) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Curricular Materials</u>					
E16	Charter school uses standards-aligned instructional materials.	<ul style="list-style-type: none"> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Classroom observations (Binder 1, Tab 10, Q1) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E17	Charter school uses instructional materials that address the specific needs of English Learners.	<ul style="list-style-type: none"> Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q9) Classroom observations (Binder 1, Tab 10, Q2) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	While attempts are made to address the needs of English learners, instructional materials and services provided are insufficient to address the specific needs of English learners in this instructional setting. Greater oversight of instruction and more frequent instructional delivery is needed to address specific student needs and tailor learning to meet student needs.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E18	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"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q10) Classroom observations (Binder 1, Tab 10, Q3) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is limited designated ELD, however it is not clear that integrated ELD is happening in alignment with State standards.
E19	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"> Class schedule (Binder 2, Tab 11) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q11) Classroom observations (Binder 1, Tab 10, Q4) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The amount and quality of designated ELD is not sufficient to comply with State requirements.
Assessment					
E20	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"> Assessment calendar (Binder 2, Tab 12) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E21	SBAC and Dashboard Data indicate that the charter school is on target for meeting renewal requirements as set forth in EC 47607(b).	<ul style="list-style-type: none"> SBAC (Binder 2, Tab 13) Dashboard Data (Binder 2, Tab 14) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Because of inconsistencies in school structure, there is no State CAASPP comparison data for this school.
E22	Charter school has completed and timely posted a SARC containing required elements.	<ul style="list-style-type: none"> SARC (Binder 2, Tab 15) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E23	Charter school regularly collects student achievement data and reports it to parents and staff.	<ul style="list-style-type: none"> Sample data reports to parents (Binder 2, Tab 16) Sample data reports to staff (Binder 2, Tab 17) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q13) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E24	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"> Notifications (Binder 2, Tab 18) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E25	Charter school has current LCAP/LCAP Update that has been presented to, reviewed and approved by the Charter School's governing board.	<ul style="list-style-type: none"> LCAP/LCAP update (Binder 2, Tab 19) Minutes from Board meeting (Binder 2, Tab 20) 	√	<input type="checkbox"/>	
E26	Title I funds/categorical funding are being used to supplement the school's LCAP goals.	<ul style="list-style-type: none"> LCAP/LCAP update (Binder 2, Tab 19) Director of finance (or equivalent) interview (Binder 1, Tab 2, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Admissions</u>					
E27	Charter school complies with the admissions practices described in the approved charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background, students with disabilities, English learners, and FRPL students).	<ul style="list-style-type: none"> Charter school student data (Binder 2, Tab 23) Student data from nearby school districts (Binder 2, Tab 24) 	<input type="checkbox"/>	√	Ethnic counts are similar to Dehesa, however the count for English learners is low in comparison to the chartering district and San Diego County.
E30	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 cover options and enrollment assistance information.	<ul style="list-style-type: none"> Admissions/enrollment forms and policies (Binder 2, Tab 21) 	<input type="checkbox"/>	<input type="checkbox"/>	
E31	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.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Admissions/enrollment forms and policies (Binder 2, Tab 21) Lottery procedures (Binder 2, Tab 22) 	<input type="checkbox"/>	<input type="checkbox"/>	

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Discipline</u>					
E32	Charter school discipline policies and practices are consistent with terms of charter.	<ul style="list-style-type: none"> Approved charter (Binder 2, Tab 1) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	
E33	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.	<ul style="list-style-type: none"> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q14) 	<input type="checkbox"/>	<input type="checkbox"/>	
E34	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"> Discipline data (Binder 2, Tab 26) Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Health and Safety</u>					
E35	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.	<ul style="list-style-type: none"> School safety plan (Binder 2, Tab 27) 	<input type="checkbox"/>	<input type="checkbox"/>	
E36	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"> Training sign-in sheets (Binder 2, Tab 28) Observation of main office (Binder 1, Tab 11, Q2) 	<input type="checkbox"/>	<input type="checkbox"/>	
E37	Charter school has a policy/procedure for visitors to enter and leave campus.	<ul style="list-style-type: none"> Policy or procedure (Binder 2, Tab 29) 	<input type="checkbox"/>	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E38	Charter school provides for the screening of pupils' vision, hearing, screening for scoliosis, and required immunizations.	<ul style="list-style-type: none"> Records of student screenings (Binder 2, Tab 30) 	<input type="checkbox"/>	<input type="checkbox"/>	
E39	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"> Suicide Prevention Policy (Binder 2, Tab 31) Board meeting minutes (Binder 2, Tab 32) 	<input type="checkbox"/>	<input type="checkbox"/>	
E40	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 findings are reviewed in a public meeting every 4 years), as provided in Education Code section 49564(c).	<ul style="list-style-type: none"> Application for universal meal service (Binder 2, Tab 33) Governing board resolution (Binder 2, Tab 34) 	<input type="checkbox"/>	<input type="checkbox"/>	
E41	Charter school provides at least one meal per day to students who qualify for FRPL.	<ul style="list-style-type: none"> Executive director (or equivalent) interview (Binder 1, Tab 3, Q1) 	<input type="checkbox"/>	<input type="checkbox"/>	
E42	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"> Screenshot from website (Binder 2, Tab 35) 	✓	<input type="checkbox"/>	
E43	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.	<ul style="list-style-type: none"> Sexual health and HIV prevention education course description (Binder 2, Tab 36) 	✓	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E44	By January 1, 2020, 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.	<ul style="list-style-type: none"> Policy or other description of method for informing parents/guardians (Binder 2, Tab 37) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Parent Notifications</u>					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 38) 	✓	<input type="checkbox"/>	
E46	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).	<ul style="list-style-type: none"> Notice (Binder 2, Tab 39) 	✓	<input type="checkbox"/>	
E47	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"> Notice (Binder 2, Tab 40) 	<input type="checkbox"/>	<input type="checkbox"/>	
E48	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.	<ul style="list-style-type: none"> Notice (Binder 2, Tab 41) 	<input type="checkbox"/>	<input type="checkbox"/>	
<u>Student Records</u>					
E49	Charter school maintains comprehensive records regarding its students.	<ul style="list-style-type: none"> Roster of students, including name, grade level, school district of residence, county of residence, parent/guardian name, and contact number (Binder 2, Tab 42) 	✓	<input type="checkbox"/>	

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E50	Charter school maintains student records, including special education records, in a confidential and secure location.	<ul style="list-style-type: none"> Policy regarding confidentiality of student records (Binder 2, Tab 43) Observation of main office (Binder 1, Tab 11, Q3) 	√	<input type="checkbox"/>	
E51	Charter school has a policy or procedure for parents to review student files, including a log.	<ul style="list-style-type: none"> Policy regarding review of records (Binder 2, Tab 44) 	<input type="checkbox"/>	<input type="checkbox"/>	
E52	Charter school has policy or procedure regarding release of student information.	<ul style="list-style-type: none"> Policy regarding release of student information (Binder 2, Tab 45) 	<input type="checkbox"/>	<input type="checkbox"/>	
E53	Teachers have reasonable access to special education records.	<ul style="list-style-type: none"> Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q15) 	<input type="checkbox"/>	<input type="checkbox"/>	
Total "No" Responses: 6 Risk Assessment: 0-13 Low 14-26 Moderate 27+ High					

815-21/4535127.4

Assigned District Staff:
 JoAnn Murphy
 Position of Assigned Staff Person:
 Special Education Lead

PACIFIC ACADEMY SPECIAL EDUCATION OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
<u>Educational Program</u>					
E1	Charter school curricular and instructional plan complies with approved charter.	<ul style="list-style-type: none"> √ Approved charter (Binder 2, Tab 1) √ Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) 	X		6/27/17 MOU with Dehesa under Learning Latitudes Charter; 4/2/18 MOU as LEA within El Dorado SELPA for special education purposes.
E2	Charter school curricular and instructional plan is aligned with the needs of students that approved charter identifies as target population.	<ul style="list-style-type: none"> √ Approved charter (Binder 2, Tab 1) √ Description of courses, instructional framework, and/or scope and sequence (Binder 2, Tab 2) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, 01) √ Annual Performance Report, Special Education 	X Partial		<p>Curriculum is aligned and integrated with the IEP for students with disabilities on an individual basis. At initial placement the IEP is reviewed with the parent and reviewed within 30 days to determine if placement is appropriate. Most of the target special education population are in the mild/moderate range.</p> <p>Did not meet the state target of >95% participation rate in ELA/Math with rating of ELA (81.43% and Math (80%) Assigned PIR by CDE.</p> <p>Met the ELA achievement rate 29.17%</p>

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E3	Charter school staffing complies with approved charter.	√ Approved charter (Binder 2, Tab 3) Staffing chart (Binder 2, Tab 3)	X		Pacific Coast operates under all administrative regulations and procedures of the El Dorado SELPA for special education.
E4	Charter school staffing is sufficient to carry out educational program.	√ Staffing chart (Binder 2, Tab 3) √ Instructional leader	X		The IEP specialists supports the appropriate development of IEPs; Programs are supported by Program Specialists; Teachers have caseloads of 10 students with a lot of integration with staff. Parents reported great consistency and programs and services.
<u>Services to Special Populations</u>					
E7	Charter school policies and practices ensure appropriate placement for students who are enrolling with IEPs.	√ SELPA policies and procedures manual (Binder 2, Tab 6) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q3)	X		The school follows policies and procedures of the SELPA; Consultant did a random review of IEPs in SEIS and met with parents to confirm that there are appropriate practices that are consistently implemented for student that enroll with IEPs. Oversight El Dorado
E8	Charter school policies and practices ensure referral and assessment of students suspected of requiring special education and related services, either through IDEA or Section 504.	√ SELPA policies and procedures manual (Binder 2, Tab 6) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q4)	X		Evidence of Student Study Team Process for both IDEA and 504. Verified by parents participating in both. Oversight by El Dorado

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E9	Charter school policies and practices ensure compliance with IDEA special education timelines.	<ul style="list-style-type: none"> √ SEIS Unannounced IEP compliance review by DCOT √ Verified by Compliance Director in EI Dorado SELPA 	X		Timelines were verified by unannounced SEIS review of random IEP files and a designation of Data Identified Noncompliance (DINC) by CDE found the school out of compliance; however, these have been cleared as of this date. Oversight by EI Dorado
E10	Students identified as eligible for special education receive services required by their IEPs and 504 plans.	<ul style="list-style-type: none"> √ Sample IEPs (Binder 2, Tab 8) √ Sample 504 plans (Binder 2, Tab 9) √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q6) 	X		No evidence that service tracker or some method of documentation is used to track the provision of services in the IEP—This is not a risk area for Dehesa oversight. Oversight EI Dorado
E11	All required members of IEP teams attend IEP meetings.	<ul style="list-style-type: none"> √ Sample IEPs (Binder 2, Tab 8) √ Verified in unannounced review of IEP during study by DCOT 	X		Verification through SEIS. Oversight by EI Dorado.
E12	Charter school does not enroll a disproportionately small number of students with disabilities.	<ul style="list-style-type: none"> √ Data demonstrating percentage of students with disabilities in charter school (Binder 2, Tab 10) 	X		10.8% of the school population is students with disabilities; the statewide average is 11.9% of general education population but the school is not disproportionately enrolling a small number of students with disabilities.
E13	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"> √ Director of finance (or equivalent) interview (Binder 1, Tab 2, Qi) 	X		The 6500 resource code expenditures reviewed diligently to ensure that special education funds are used appropriately.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Assessment					
E20	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"> √ Instructional leader (or equivalent) interview (Binder 1, Tab 1, Q12) √ Annual Performance Report 	X		Did not meet state targets for English/Language Arts and Math Participation rate and also did not meet target for math achievement rate. Identified for PIR monitoring-oversight by EL Dorado for resolution of PIR. Dehesa would have some oversight over the math achievement.
Admissions					
E28	Admissions process for a student with an IEP is the same as for a student without an IEP.	<ul style="list-style-type: none"> √ Admissions/enrollment forms and policies (Binder 2, Tab 21) √ Parent and staff interviews 	X		The admissions process is the same but for students with an IEP/ the IEP is reviewed and an interim IEP is scheduled per administrative procedures of the El Dorado SELPA.
E29	Student data demonstrate that population is reflective of the District (including racial and ethnic background students with disabilities, English learners , and FRPL students).	<ul style="list-style-type: none"> √ Charter school student data (Binder 2, √ Student data from nearby school districts (Binder 2, Tab 24) √ California Dashboard 	X		FRPL 48.3% close to Dehesa @ 56.2% EL 15.5% exceeds Dehesa @ 10.9%
Discipline					
E32	Charter school discipline policies and practices are consistent with terms of charter.	<ul style="list-style-type: none"> <input type="checkbox"/> Approved charter (Binder 2, Tab 1) <input type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of 	X		

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
E33	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 (Binder 2, Tab 25) <input type="checkbox"/> Instructional leader (or equivalent) interview (Binder I, Tab I 014)	X		Outlined in the policies and procedures for El Dorado County SELPA.
E34	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 (Binder 2, Tab 26) <input checked="" type="checkbox"/> Discipline policies and procedures, including policies regarding discipline of students with disabilities (Binder 2, Tab 25) <input checked="" type="checkbox"/> Annual Performance Report	X		No reported discipline incidents of 10 days or more; Annual Performance report indicates that targets have been met.
Parent Notifications					
E45	Charter school provides a notice to all parents/guardians regarding their rights under the Family Educational Rights and Privacy Act.	<input checked="" type="checkbox"/> Notice (Bin der 2, Tab 38) <input checked="" type="checkbox"/> Procedural Safeguards on IEP forms	X		Parental Rights for students with disabilities is provided at a minimum at each annual and triennial review and any additional assessment related to a new suspected disability area/ or significant changes.
Student Records					
E49	Charter school maintains comprehensive records regarding its students.	Name and contact number (Binder Tab 42) Roster of students, including name, grade level, school district and county of residence, parent/guardian	X		Master files for special education are maintained in a confidential manner with limited access to access to designated staff. General education teachers and principals have read only access and special education teachers have full access to update and manage the IEP process.

Total "No" Responses: _1

Risk Assessment:

0-13 Low 14-26 Moderate 27+ High

Assigned District Staff: Justin Cunningham
 Position of Assigned Staff Person: Project Lead

PACIFIC COAST ACADEMY OPERATIONS/FACILITIES OVERSIGHT CHECKLIST

No.	Compliance Area	Evidence to Review	Yes	No	Comments
Maintenance of Facilities					
O32	A designated person is responsible for overseeing operations and facilities management.	√ Staff organizational chart (Binder 4, Tab 1)	X		Resubmitted with "Facilities" below Principal.
O33	Facilities are adequate for number of students and types of programs.	√ Capacity chart for campus facilities (Binder 4, Tab 2) √ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q1)	X	X	Evidence was for resource Center in Costa Mesa only
O34	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 type="checkbox"/> Inspection logs (Binder 4, Tab 3) <input type="checkbox"/> Operations manager (or equivalent) interview ((Binder 1, Tab 5, Q2)		X	
Legal Compliance					
O35	All facilities meet Americans with Disabilities Act requirements.	<input type="checkbox"/> ADA certification (Binder 4, Tab 4)		X	
O36	All single-user restrooms have been designated as all-gender restrooms.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q3)	X	X	Noted at Poway Office, but no evidence for resource center.
O37	Charter school has developed asbestos management plan in accordance with the Asbestos Hazard Emergency Response Act.	<input type="checkbox"/> Asbestos Management Plan (Binder 4, Tab 5)			
O38	Charter school has certificate of occupancy on file.	<input type="checkbox"/> Certificate of occupancy (Binder 4, Tab 6)			Submitted document for church in 1991

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O39	Charter school has conditional use permit on file, as applicable.	√ Conditional use permit (Binder 4, Tab 7)		X	One submitted is for Vineyard Christian Fellowship, dated 8/31/10, not Sanctuary
O40	Charter school has safety inspection by local fire department on file.	√ Safety inspection by local fire department (Binder 4, Tab 8)	X		Yes for Poway Office and Sanctuary (resource center)
O41	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.	√ Emergency action plan (Binder 4, Tab 9) √ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q4)	X	X	An incomplete Comprehensive School Safety Plan is submitted for 1740 Huntington Drive, Duarte CA, along with a statement stating the lack of interscholastic athletics negates their requirement for emergency plan, but they also include Emergency action plan for resource center with no AED identified.
O42	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q5)			N/A They are just below the 40%
O43	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.	<input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q12)			N/A
O44	Charter school has adequate insurance coverage that names the District as additional insured, as applicable.	√ Certificates of insurance (Binder 4, Tab 10)	X		The resubmitted evidence is dated 3/21/20.

This document is intended for sole use by Dehesa School District and may not be duplicated or used without permission.

No.	Compliance Area	Evidence to Review	Yes	No	Comments
O45	Charter school has provided assurance that it complies with the geographic and site limitations under Education Code sections 47605 and 47605.1.	√ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q7)	X		
O46	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 (Binder 4, Tab 11) <input type="checkbox"/> Operations manager (or equivalent) interview (Binder 1, Tab 5, Q8, Q9)			All facilities such as those leased, rented or subleased are not listed. Those needed for testing of independent study students are one example.
O47	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.	√ List of facilities (Binder 4, Tab 11) √ Operations manager (or equivalent) interview (Binder 1, Tab 5, Q10)		X	The resubmitted evidence includes an address in El Cajon that is not in the petition or any material revisions.
Total "No" Responses: 8.5 Risk Assessment: 0-4 Low 5-7 Moderate 8+ High					

The site Principal tried to comply, but was directed by Inspire that this compliance did not apply to students because it was an independent study charter and the initial document binder had many blank tabs. However, it was explained that the learning center in Costa Mesa required compliance, many of the safety issues applied to staff, and the summative testing of students requires facilities. The oversight process helped the Principal to understand the Compliance Areas more and what evidence was needed. The PCA Principal resubmitted a few pieces of evidence that reduced their risk level some. 815-21/4533461.5