

INTERNAL MONITORING REPORT

November 16, 2022

Policy: **2.9 Charter Schools**
Policy Category: **Operating Limitations**
Period Monitored: **July 1, 2021 – June 30, 2022**

This is my monitoring report on the Board of Education's Operating Limitation Policy 2.9 Charter Schools. This report is presented in accordance with the Board's monitoring schedule. I certify that the information is true and complete.

Chris Gdowski, Superintendent
November 10, 2022

POLICY WORDING:

With respect to charter schools, the Superintendent shall not cause or allow either the District or a charter school to avoid its responsibilities under applicable Board policies and relevant agreements.

Without limiting the generality of the foregoing, the Superintendent shall not fail to:

- 1. (a) Establish written interpretations of all Board policies through either Superintendent policies or specific contractual provisions, and (b) timely submit to the Board an appropriate written decision assurance for the waiver of any Board policies the Superintendent deems irrelevant to a specific charter school.*
- 2. Establish and execute an annual or more frequent monitoring schedule and monitoring process for each charter school with respect to contractual provisions and Board policies not expressly waived by the Board.*
- 3. Allow any charter school board, after the Superintendent's internal hearing procedures, have been exhausted, to appeal to the Board any Superintendent's interpretation or decision that the charter school board deems unreasonable.*

INTERPRETATION:

I interpret the following language:

(a) Establish written interpretations of all Board policies through either District policies or specific contractual provisions”

to mean:

1. District policies, which interpret and implement all Board policies, are available at each school upon request or on the District web page.
2. The terms of each charter school contract comply with Board policies unless a waiver of Board policies has been formally approved by the Board of Education.

DATA REPORTED:

1. All District charter schools have access to District policies, Board policies, and Operating Limitations policies via the District website. Administrators at District charter schools are notified via email by Sue Parker, Senior Executive Assistant (Superintendent's Office/Legal Services/Communications) immediately upon revision of existing or adoption of new policies. This is followed by a discussion as needed at the next monthly charter collaboration meeting facilitated by the Director of Charter Partnerships.

2. The contracts for Westgate Community School and The New America School - Thornton expire on June 30, 2023. As such, per District Policy 1600 and state statutory requirements (C.R.S. 22-30.5-110), the District Charter Schools Office is currently completing charter renewals of both schools. The Board of Education will rule by resolution on the renewal decisions no later than February 1st, as outlined in District Policy 1600.

COMPLIANCE STATEMENT:

I report compliance with charter school access to District policies, Board policies, and Operating Limitations policies and with charter school contracts to Board policy.

INTERPRETATION:

I interpret the following language:

...(b)timely submit to the Board an appropriate written decision assurance for the waiver of any Board policies the Superintendent deems irrelevant to a specific charter school

to mean:

The Superintendent, upon receipt of a “waiver request” from any charter school, submits a decision information report to the Board of Education within one month of receiving the official request for waiver. This interpretation holds true for Board Ends Policies and Operating Limitations Policies.

Data Reported:

No new requests for policy waivers were received, nor were any renewal contracts completed during the monitoring period of July 1, 2021 – June 30, 2022.

COMPLIANCE STATEMENT:

I report compliance with this standard.

INTERPRETATION:

I interpret the following language:

Establish and execute an annual or more frequent monitoring schedule and monitoring process for each charter school with respect to contractual provisions and Board policies not expressly waived by the Board

to mean:

1. Charter contracts identify essential data, reports, and other material items necessary to demonstrate compliance with district policy, state and federal law. Charter schools submit the required data on an ongoing basis, and the District Charter Schools Office provides ongoing monitoring for compliance with scheduled benchmarks.
2. The District's Office of Charter Schools reviews all current Board of Education policies and existing charter school contracts no less than annually to determine whether each charter school complies with provisions that have not otherwise been waived.

Data Reported:

1. The Office of Charter Schools monitored compliance with all report requirements on an ongoing basis, conducted a detailed review of all contract provisions, and communicated with charter representatives periodically to review compliance with contractual requirements. Monitoring processes include, but are not limited to:
 - a. Benchmarks and Assurances document outlining all timebound and ongoing required deliverables of all District-authorized charters as well as District responsibilities as outlined in the charters' contracts. This document is shared with all charter schools and is a living document, updated to reflect charters meeting deliverable expectations.
 - b. Monthly "Partnership Meetings" between district staff and each school's administration allow for verification of all required data and document submissions
 - c. Annual performance monitoring analysis for each charter school addressing the school's performance in the areas of student achievement, financial responsibility, and general operational expectations

COMPLIANCE STATEMENT:

I report compliance with the monitoring schedule and process within this standard.

INTERPRETATION:

I interpret the following language:

Allow any charter school board, after the Superintendent's internal hearing procedures have been exhausted, to appeal to the Board any Superintendent's interpretation or decision that the charter school board deems unreasonable

to mean:

A charter school board may submit appeals of the Superintendent's interpretations or decisions to the Board of Education. In such an event, the Superintendent schedules a hearing with the Board of Education within two weeks of the request for a hearing with the Board. Charter school representatives are informed in writing of their right to appeal decisions of the Superintendent. An appeal of a Superintendent interpretation is accompanied by an alternate interpretation developed by the respective Charter school board.

DATA REPORTED:

No protests of the Superintendent's interpretations of policy or the Superintendent's decisions have been submitted by any charter schools during the monitoring period.

COMPLIANCE STATEMENT:

I report compliance with this standard.

The Board acknowledged receipt of a monitoring report as of November 16, 2022, for the period July 1, 2021 through June 30, 2022, of the Superintendent concerning Board Policy 2.9 Charter Schools and found the Superintendent's interpretations were reasonable and supported by data that was relevant, justified and complete.