

**Executive Limitation 3.E  
Asset Protection**

To: Board of Education

From: Dr. Chris Fiedler, Superintendent of Schools

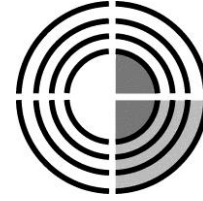
Re: Expectations of the Board – 3.E Asset Protection

I hereby present my report on our Asset Protection Executive Limitation 3.E in accordance with the schedule as set forth in Board policy. I certify the information in this report is true.



Signed: \_\_\_\_\_  
Superintendent, School District 27J

Date: April 28, 2015



**Policy 3.E – ASSET PROTECTION**

Date Adopted/Last Revised: April 24, 2012

**The Superintendent will not cause or allow corporate assets to be unprotected, inadequately maintained or unnecessarily risked.**

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The Superintendent will not:

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2. Subject facilities and equipment to improper wear and tear or insufficient maintenance. Page 7

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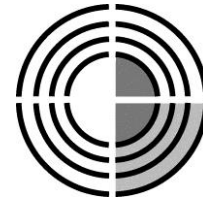
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Reporting: Compliance



## Policy 3.E – ASSET PROTECTION

Date Adopted/Last Revised: April 24, 2012

**The Superintendent will not cause or allow corporate assets to be unprotected, inadequately maintained or unnecessarily risked.**

*I interpret assets to represent physical and intellectual property of the District with a value greater than \$5,000.*

*I interpret unprotected as assets without insurance.*

*I interpret inadequately maintained as a lack of preventive maintenance, repair, or renovation which may cause an asset to deteriorate or experience an accelerated depreciation.*

*I interpret unnecessarily risked as exposure of assets to circumstances resulting in a higher likelihood of theft or otherwise being unavailable for the asset's intended purpose.*

### **Data Reported**

The data contained in this report will illustrate that the District's assets have been protected using insurance coverage amounts that meet or exceed industry standards and are similar to those utilized by our fellow members of the Adams County Board of Cooperative Educational Services (BOCES) which includes the school districts of Mapleton, Adams 12, Adams 14, and Adams 50. Premiums and claim payments are within industry standards for a district the size of School District 27J. Insurance contracts and policies are in place with the appropriate level of protection and all loss claims against the policies are recovered, less the deductible. Insurance costs for general liability, auto liability, and property protection indicate adequate coverage to protect District assets. The Colorado Group Insurance Association (CGIA) permits public entities to self-insure as well as to purchase commercial insurance subject to C.R.S. 24-10-115 and 29-13-101, 102 & 105.

In addition to insurances, the District participates in a number of training opportunities provided by the Adams County BOCES to improve risk management practices, mitigate risks and reduce loss. Additional consultation is available through our insurance broker. The BOCES Workers' Compensation/Safety Advisory Council is comprised of representatives from each district. This group meets monthly to discuss workers' comp issues, review claims, and make recommendations to the Board of Directors regarding safety and loss control issues.

As a public agency, the processes by which a claimant can attempt to recover damages and/or losses as well as the limits of how much a claimant can collect from District 27J are regulated by the Colorado Governmental Immunity Act (CGIA). In very general terms, claimants may seek a waiver of this protection if the agency failed to act reasonably and/or allowed a known dangerous condition to exist that eventually caused harm. Even with governmental immunity, the claim must be investigated and a response put forward. Under the CGIA recoveries are limited to \$350,000 per person and \$990,000 per claim. Examples of claims that could be made against school districts include ice and snow on

walkways, student supervision, and facility maintenance.

In 2004 the BOCES Insurance Pool added E&O (Errors and Omission) coverage which insures the districts against wrongful acts committed by the district. A recent copy of this coverage was provided to individual members of the Board of Education of School District 27J. Employment practices liability and educators professional liability are also included in this coverage. Board members face these exposures and should be aware that claims presented to the Pool are not subject to the Colorado Governmental Immunity Act (CGIA) which limits the levels of recovery by claimants.

The District takes the necessary precautions to prevent unnecessarily risking the image of the District and to protect its assets through adherence to its policies and procedures. These policies and procedures address employee conflict of interest and purchasing. External audits have been performed to measure compliance with them.

Intellectual property, information, and files are backed up and protected from misuse, significant damage, or copyright infringement in accordance with accepted governmental standards.

The state mandated set-aside for capital reserve funding was eliminated after the 2008-2009 school year. That statutory change in conjunction with declining per-pupil funding in FY 2010, FY 2011, and FY 2012 caused the District to realign many of its practices in an effort to remain compliant with the District's Global End of raising academic achievement. The allocation of resources to this end, while initially thought to be short term, has now been in place for many years and the long term impact is being felt within our facilities management program. Since that time the District has attempted to increase funding for capital purposes, but the age of our buildings coupled with rapidly escalating construction costs has prevented District staff from performing reasonable life expectancy replacements on critical components of the District's physical assets.

Through the efforts of staff, all buildings have been able to open and serve their intended purpose each day during the past year. However, without a significant and continuous investment in our capital infrastructure and an improved effort to perform reasonable life expectancy replacements the opportunity to achieve this standard and claim compliance in this area may be jeopardized for years to come.

Newly created data in section two of this report will demonstrate this area of non-compliance.

**The Superintendent will not:**

- 1. Allow the organization to be uninsured:**
  - a) Against theft and casualty losses to at least 90% of replacement value;**
  - b) Against liability losses to Board members, staff and the organization itself in an amount equal to or greater than the average for comparable organizations; and**
  - c) Against employee theft and dishonesty.**

*I interpret insured to be defined as appropriate policies shall be in place and all claims against the policies are resolved.*

**Data Reported**

State law mandates minimum automobile bodily injury coverage of \$25,000 and minimum property

damage coverage of \$50,000 per incident. The District has in place insurance policies to cover acts of litigation, settlements, judgments and staff injuries resulting in financial remuneration by the District. The policies provide coverage for these acts to the extent available through insurance contracts. There are certain acts that are not insurable.

The District is a member with four other school districts of the Adams County BOCES Insurance Pool (the Pool) which provides insurance coverage for all its members. The Pool’s Board of Directors consists of one member appointed by the Board of Education of each participating school district. All members of the Pool’s Board of Directors have an equal vote in the administration of the Pool’s activities, are responsible for selection of management, and have complete responsibility for all fiscal matters in the operation of the Pool.

The District pays annual premiums for property, liability, and workers’ compensation coverage. In the event aggregated losses incurred by the Pool exceed amounts recoverable from reinsurance contracts and funds accumulated by the Pool, the Pool may require additional contributions from the Pool members. Any excess funds that the Pool determines are not needed for purposes of the Pool may be returned to the members pursuant to a distribution formula.

The Pool, which is subjected to actuarial review and annual audit, has various levels of self-insured retentions and purchases excess insurance for amounts above the retentions for liability, property, and workers’ compensation coverage.

## ADAMS BOCES SELF-INSURANCE POOL

2014-2015

### *Hierarchy of Coverage By Line*

	Property (Buildings, Vehicles, & Contents)	E & O	Liability	Workers' Compensation	Boiler & Machinery	Employee Dishonesty (Crime)
District Responsibility	\$0 - \$1,000	\$0 - \$10,000	\$0	\$0	\$0 - \$5,000	\$0 - \$25,000
Pool Retention	\$1,000 - \$100,000	\$10,000 - \$150,000	\$0 - \$150,000	\$0 - \$550,000	None	None
Excess Coverage	\$100,000 to \$1,000,000  BRIT	\$150,000 to \$10,000,000 (*Abuse to \$5M)  BRIT	\$150,000 to \$5,000,000 Auto Liability \$10,000,000 General Liability BRIT	\$550,000  Statutory  Safety National	\$5,000 to \$50,000,000  Hartford	\$25,000 to \$1,000,000  Travelers
Additional Excess Coverage	\$1,000,000 to \$100,000,000 Travelers					



Adams BOCES  
Self Insurance Pool

\*Student Sexual Abuse has a sub-limit of \$5,000,000 under Educators Legal Liability. Charter Schools are excluded from all lines of coverage.

This interpretation is reasonable because its intent meets industry standard for insurance as established by the Adams County BOCES Limits and Retentions.

**Conclusion: I report compliance.**

**The Superintendent will not:**

**2. Subject facilities and equipment to improper wear and tear or insufficient maintenance.**

*I interpret facilities to comprise buildings and grounds owned or leased by the District.*

*I interpret equipment to mean tools, electronic data processing equipment, vehicles and machines that either alone or in combination comprise and/or support operating systems within these facilities, and property with a value exceeding \$5,000, and a useful life greater than one year.*

*I interpret electronic data processing equipment to mean communications equipment used for essential operational activities. Those pieces of equipment are building level switches, phone switching equipment, and fiber connections.*

*I interpret improper wear and tear as failure to sustain the integrity of the asset in a timely manner or protect the normal life of the asset for the asset's intended purpose within the funding capacities provided.*

*I interpret insufficient maintenance as not keeping up with preventive and corrective maintenance as recommended by the manufacturer or prevailing industry practice.*

**Data Reported**

**Buildings**

The District owns and maintains a number of facilities. The following chart is a summary description of the facilities, the square footage, and the insurable values of the building and their contents:

	<b>Number of Buildings</b>	<b>Square Footage</b>	<b>Value of Buildings</b>	<b>Value of Contents</b>	<b>Site Improvements</b>	<b>Total Value</b>
School Facilities	19	1,526,954	\$273,132,363.50	\$25,355,444.70	\$3,078,156.00	\$301,565,964.20
Modulars	37	74,216	\$6,081,644.95	\$907,154.75	\$0.00	\$6,988,799.70
Other Facilities/Out Buildings	20	154,000	\$14,547,452.03	\$4,085,050.46	\$42,317.00	\$18,674,819.49
Grand Total	76	1,755,170	\$293,761,460.49	\$30,347,649.91	\$3,120,473.00	\$327,229,583.39

The District has participated in three different independent analyses to assist in the organization of facility data in an attempt to anticipate facility and equipment needs and to serve as a guide in the allocation of resources in making repairs. The first analysis was completed in February 2008 and the second analyses completed in March 2010 have been supplemented by staff input to create priority levels for investment. The Colorado Department of Education has also conducted an analysis regarding

our facility conditions.

The five priority levels established were:

- Priority 1** - Items impacting the life, health, and safety of building occupants.
- Priority 2** - Items affecting the immediate operational use of the facility.
- Priority 3** - Items affecting the educational program or mission of the facility.
- Priority 4** - Items not rectified in a timely manner will increase the cost of the repair.
- Priority 5** - Items of aesthetic value.

The priorities established in the 2009 report are reasonable as the primary function of our facilities remains to provide a safe, healthy, and functional environment for the education of our students.

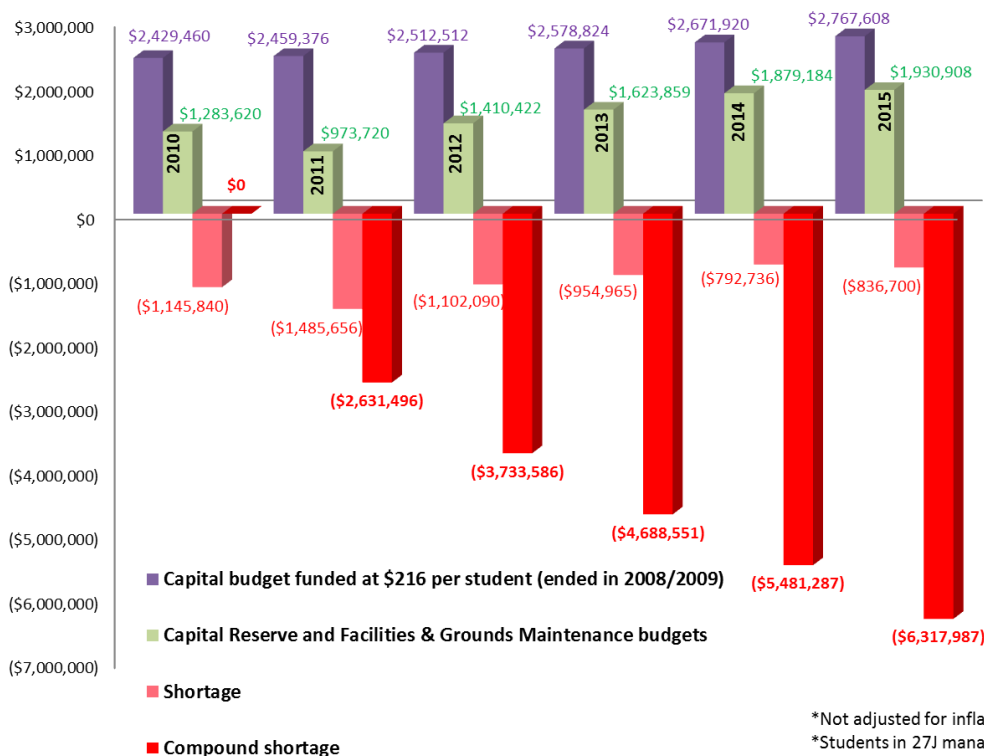
A 100% rating has been achieved for this year by keeping all facilities open and able to serve their intended service each day of the past year. However, reduced funding availability and the lack of routine and continued maintenance, coupled with the financial inability to perform reasonable life expectancy requirements, causes us to claim non-compliance in this area.

The following two charts illustrate the cause and effect of the reduction in District spending since the elimination of the state mandated Capital Reserve set-aside and the impact on reasonable life expectancy replacements of critical District components.

The first chart demonstrates the shortfall in funding for capital improvements based on the District’s actual budgets subtracted from the amount that would have been available had the District maintained the previously required reserve.

The second chart is a non-inclusive list of some of the items deferred beyond their reasonable life expectancies.

### Capital Funding Shortfall





## Items Past Their Useful Lives

Building	Equipment Manufacture or Install Date	Specific Item of Concern	Useful Life	Past Useful Life?
<b>Elementary Schools</b>				
Second Creek Elementary	2003	HVAC Controls	15	yes/obsolete
Thimmig Elementary	2002	HVAC Controls	15	yes/obsolete
Henderson Elementary	1998	Carpet	7-12	yes
Southeast Elementary	1994 addition	HVAC Controls	15	yes
		Boiler	20	yes
		Chiller	20-23	2014-2017
		Resilient Flooring (VCT)	15	yes
		Roof	20	yes
Northeast Elementary	1998 remodel	Carpet	15	yes
		Concrete / Asphalt	20	yes
North Elementary	1998	Resilient Flooring	7-12	yes
<b>Middle Schools</b>				
Overland Trail Middle School	1984	Domestic Hot Water Boiler	15	yes
		North End Roof Tops	20	yes
	2001	Roof	20	yes
	2000	Fire Detection System	15	yes
	1984 - 2000	Carpet	7-12	yes
Vikan Middle School	1987 to 2000	Roof Top Units	20	yes
		Resilient Flooring / Carpet	7-12	yes
<b>High Schools</b>				
Brighton High School	1991	Roof	20	yes
	addition/remodel	Parking Lots	25	yes
	2005	Athletic Fields/ Track Surfaces	10	yes
Brighton Heritage Academy	1987	Boilers	25	yes
	1994	Roof	20	yes
<b>Administration &amp; Support</b>				
ESC	1979	Cooling Tower (west)	25	yes
	1979	Boiler (west)	20	yes
	1979	Roof	20	yes
Pool	1992	Roof	20	yes

The preceding chart, even when considered independently, gives cause to declare non-compliance within this subsection. Other data in this section will also cite the lack of available resources to adequately maintain facilities and equipment.

The remaining data in this section will demonstrate the efforts being made by staff to protect the physical assets of the District.

## Capital Reserve Expenditures by Site

	<b>FY11</b>	<b>FY12</b>	<b>FY13</b>	<b>FY14</b>	<i>FY15</i>	<b>5yr total</b>	<b>Average</b>
BOLT	\$0	\$0	\$17,125	\$0	<i>\$12,915</i>	\$30,040	\$6,008
Brantner	\$0	\$0	\$0	\$510	<i>\$0</i>	\$510	\$102
Brighton High	\$53,077	\$74,161	\$279,195	\$280,467	<i>\$381,416</i>	\$1,068,316	\$213,663
District-Wide	\$18,910	\$32,450	\$124,549	\$418,022	<i>\$139,293</i>	\$733,224	\$146,645
ESC	\$5,530	\$10,281	\$12,536	\$118,362	<i>\$877</i>	\$147,586	\$29,517
Henderson	\$0	\$5,460	\$14,462	\$11,657	<i>\$0</i>	\$31,579	\$6,316
Heritage	\$19,600	\$0	\$5,298	\$4,996	<i>\$20,000</i>	\$49,894	\$9,979
North	\$0	\$0	\$7,230	\$67,906	<i>\$37,840</i>	\$112,976	\$22,595
Northeast	\$1,850	\$10,509	\$5,496	\$1,635	<i>\$0</i>	\$19,490	\$3,898
Overland	\$100,488	\$25,000	\$181,624	\$0	<i>\$0</i>	\$307,112	\$61,422
Pennock	\$0	\$635	\$0	\$0	<i>\$85,000</i>	\$85,635	\$17,127
Prairie View High	\$4,337	\$3,300	\$21,515	\$102,116	<i>\$65,090</i>	\$196,358	\$39,272
Prairie View Middle	\$0	\$6,949	\$0	\$5,370	<i>\$2,767</i>	\$15,086	\$3,017
Second Creek	\$9,273	\$20,032	\$17,865	\$0	<i>\$4,490</i>	\$51,660	\$10,332
South	\$21,276	\$5,750	\$41,667	\$77,786	<i>\$21,330</i>	\$167,809	\$33,562
Southeast	\$2,690	\$14,475	\$68,845	\$14,549	<i>\$3,745</i>	\$104,304	\$20,861
Stuart	\$0	\$2,749	\$12,175	\$4,650	<i>\$25,273</i>	\$44,847	\$8,969
Thimmig	\$4,005	\$17,547	\$0	\$0	<i>\$0</i>	\$21,552	\$4,310
Transportation	\$0	\$33,081	\$24,042	\$43,330	<i>\$4,728</i>	\$105,181	\$21,036
Turnberry	\$0	\$0	\$0	\$0	<i>\$0</i>	\$0	\$0
Vikan	\$3,260	\$81,507	\$89,943	\$14,185	<i>\$85,000</i>	\$273,895	\$54,779
West Ridge	\$0	\$3,485	\$7,563	\$5,130	<i>\$0</i>	\$16,178	\$3,236
	<b>\$244,296</b>	<b>\$347,371</b>	<b>\$931,130</b>	<b>\$1,170,671</b>	<b><i>\$889,764</i></b>	<b>\$3,583,232</b>	<b>\$716,646</b>

The chart below illustrates examples of these FY 2015 projects:

<b>Site</b>	<b>Description</b>	<b>Amount</b>
Brighton High	Renovation of Dawg Diner	\$143,682
Prairie View High Athletics	Athletic fields improvements	\$62,500
North Elementary	New playground at North/Malcom Park	\$37,840
South Elementary	New carpet 2 classrooms, library, computer lab	\$21,330
BLARC	Bolt expansion	\$12,915
Swimming Pool	Boiler replacement	\$12,658
Overland Trail MS	New water storage tank	\$5,190
Technology	Fiber route repairs	\$1,635

## **Security of District Facilities**

The site-specific school emergency plan for each school details the site's physical security and fire protection systems in the Prevention/Mitigation section. The District has a number of systems in place to protect people and assets.

### **Access Control**

All 18 district-managed schools use a visitor management and screening system licensed from Raptor Technologies. The Brighton and Commerce City charter schools use Raptor or a similar system. Visitors present their identification card, such as a driver's license, for scanning. The entrant is screened against a national sex offender database and site-specific alerts for restraining orders and other security issues that are customized by each school. Entrants receive a badge that includes their photo, date, and destination. Written procedures have been issued for the District to standardize school access controls, and school Raptor operators were provided with a 27J User's Guide.

All elementary and middle schools have main entrances that require visitors to be screened prior to entry. Most were installed during 2014 (Brantner, Prairie View Middle and Stuart Middle had similar systems installed during school construction). These systems allow staff to view and talk to entrants before remotely unlocking the access door. They are used during school hours. There are some related projects pending to add additional office monitoring stations or door call stations to the current equipment.

Several sites have electronic card key access systems for employees, including Brantner Elementary, Brighton High School, Prairie View High School, Prairie View Middle School, Stuart Middle School, and the Network Operations Center. The Educational Services Center (ESC) has keypad entry systems on designated staff entry doors, and only the main entrance, staffed by a receptionist, should be unlocked during business hours.

### **Video Surveillance**

All schools have video surveillance systems with continuous recording. The number of cameras range from a minimum of six at most elementary schools to more than 30 at the high schools. The video recorder was upgraded and two cameras were added at Brighton Heritage Academy prior to the start of the current school year. This project was funded to enhance video surveillance in the classroom area being utilized for Brighton High School students due to overcrowding at the high school campus.

There are also video surveillance systems at the Network Operations Center, the District Swimming Pool, the Main Transportation Terminal, and on buses.

A dedicated monitor for proactive use of video surveillance has been added to the security computer in the offices of several schools. The goal is have large-screen video monitors at all sites, when funding allows. In addition, other users such as principals and SROs can view and download video, and the Emergency Response and Crisis Specialist and the Facilities Manager can access the cameras from all sites except the swimming pool, which doesn't have a network connection.

The district has a video maintenance contract with a local security contractor. When a camera or recorder fails, it has been replaced. All schools would like to have additional video cameras funded.

## Emergency Actions

School safety depends on quickly implementing emergency protocols, such as Lockout and Lockdown. Some sites have the capability to use electronic controls to quickly lock exterior doors, or close interior corridor doors to restrict the movement of an intruder. The District requires all classroom doors to be managed in locked mode so teachers can quickly implement Lockdown. Silent “panic” buttons and other improvements to emergency alerting have been reviewed and are being scoped for future funding.

## After-Hours Security Alarms

All schools have intrusion detection systems that include motion detection in the main corridors to provide after-hours protection from theft and vandalism. Other District locations with security systems are the Network Operations Center, the Technology Annex, the District Swimming Pool, and the Main Transportation Terminal. Alarms are monitored by a 24-hour service to ensure responders are promptly dispatched.

## Fire Protection

All schools have remotely-monitored fire alarm panels to ensure rapid notification of emergency responders in case the system alarms. All the school systems include smoke detection, alerting pull stations, fire extinguishers, and emergency lighting. Modular classrooms also have these systems and include notification systems for the main office if there is an alarm. More than half of the schools are protected by full sprinkler systems. The Educational Service Center, the Network Operations Center and the Main Transportation Terminal also have remotely-monitored fire protection systems.

## Back-Up Power

Nine schools have emergency natural-gas generators to provide back-up power for critical functions such as emergency lighting and fire panels. The generator at the Network Operations Center has the capacity to back up power for the entire technology building and protects all District network services including the phone system, servers, and internet connectivity.

## Summary

A number of projects are awaiting funding that will physically improve security and safety at schools. It is important to recognize that physical security depends on vigorous implementation of management systems in order to ensure school security. Ongoing auditing by school administration and district staff could improve compliance with these systems.

## Grounds

The District owns and maintains 22 developed sites containing approximately 323 acres. The District also owns five parcels of approximately 123 acres of vacant land for future school sites that must be maintained as well.

Although not presently deeded to the District, there are another 18 parcels containing approximately 237 acres that have been identified as future school sites that are in varying stages of municipal approval and/or dedication. District staff continuously monitors these processes and works closely with our governmental partners to ensure adequate school sites for future enrollment.

The following data identifies the aforementioned properties:

### 27J DEVELOPED SITES

Site	Acres	Address
Brantner K-5	14.92	7800 E 133 <sup>rd</sup> Ave, Thornton
Brighton Heritage Academy 7-12	3.6	830 E Bridge St, Brighton
Brighton High School 9-12 CLC	28.2	270 S 8 <sup>th</sup> Ave, Brighton 360 S 8 <sup>th</sup> Ave, Brighton
Educational Service Center	13.282	18551 E 160 <sup>th</sup> Ave, Brighton
Technology Annex	14.06	630 S 8 <sup>th</sup> Ave, Brighton
Henderson PK-5	14.52	12301 E 124 <sup>th</sup> Ave, Henderson
North PK-5	2.18	89 N 6 <sup>th</sup> Ave, Brighton
Northeast PK-6	9.437	1605 Longs Peak St, Brighton
Overland Trail 6-8	15.23	455 N 19 <sup>th</sup> Ave, Brighton
Pennock K-5	7.83	3707 Estrella St, Brighton
Prairie View HS 9-12	55.594	12909 E 120 <sup>th</sup> Ave, Henderson
Prairie View MS 6-8	22.6	12915 E 120 <sup>th</sup> Ave, Henderson
Second Creek PK-5	14.73	9950 Laredo Dr, Commerce City
South K-5	3.7	305 S 5 <sup>th</sup> Ave, Brighton
Southeast K-5	11.4	1595 Southern St, Brighton
Stuart MS 6-8	22.094	15955 E 101 <sup>st</sup> Way, Commerce City
Swimming Pool	4.39	565 Southern St, Brighton
Thimmig PK-5	5.37	11453 Oswego St, Henderson
Transportation Facility	19.9	11701 Potomac St, Brighton
Turnberry PK-5	10.38	13069 E 106 <sup>th</sup> Pl, Commerce City
Vikan 6-8	19.68	879 Jessup St, Brighton
West Ridge K-5	10.9	13102 Monaco St, Thornton
<b>Total Acres</b>	323.187	

## 27J FUTURE SCHOOL SITES – OWNED

Site Location	Acres	Potential Usage
Talon Pointe – Monaco & 156 <sup>th</sup> – Thornton	11.12	ES
Brighton East Farms Filing No. 2 – Brighton	15	ES
Indigo Trails – 1/2 mi north of 144th Ave, W of 19th Ave alignment – Brighton	13.5	ES
ESC - 18551 E 160th Ave – Brighton	10	ES
Riverdale Peaks II - 136th & Yosemite – Thornton	73.04	MS/HS
<b>Total Acres</b>	<b>122.66</b>	

The first column in the following chart includes the jurisdiction in which the property exists.  
(AC = Adams County; BR = Brighton; CC = Commerce City; TH = Thornton)

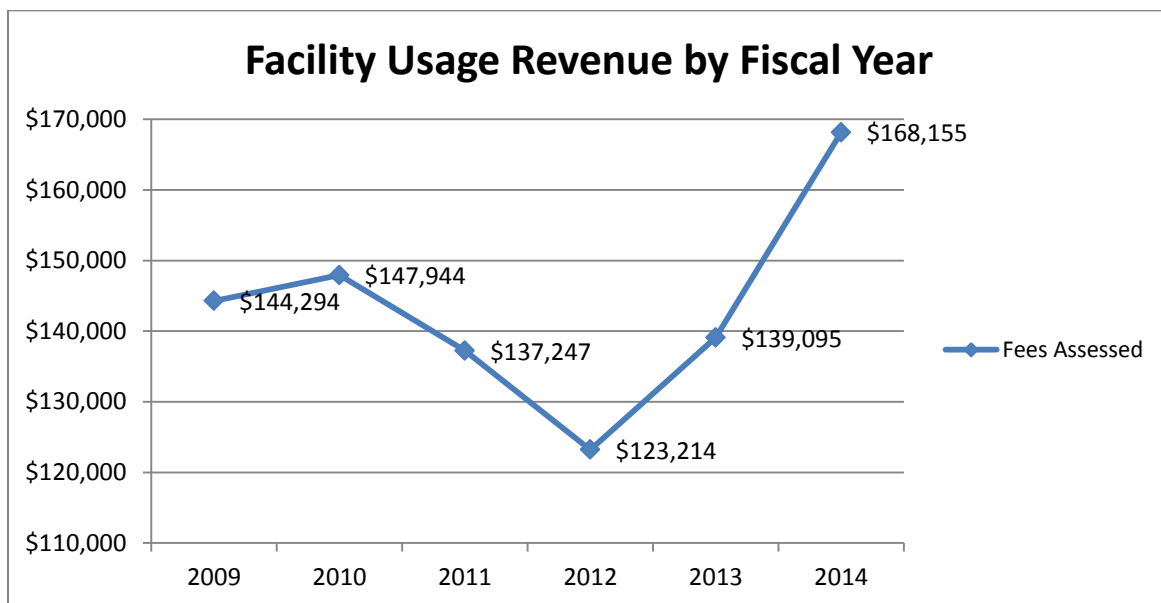
## 27J FUTURE SCHOOL SITES – IN PROCESS OF ACQUISITION

Jur	Site Location	Acres	Potential Usage
BR	Prairie Center (Sec 20 T1S, R66W)	20.1	MS
BR	Mountain View – N of Denver St, E of 27 <sup>th</sup> , W of Telluride	9.83	ES
BR	Brighton Lakes – Between 136 <sup>th</sup> & 144 <sup>th</sup> Sable & Buckley	10	ES
BR	Brighton Crossing	10	ES
BR	Prairie Center – ½ mi S of Bromley Ln, E of Buckley, N of 144th	10.02	ES
CC	Buckley Crossing – ½ mi N of 112 <sup>th</sup> between Buckley & Tower Rd	5	ES
CC	Reunion – S of 104 <sup>th</sup> between Peoria & Potomac	15	ES
CC	Reunion – S of 104 <sup>th</sup> between Potomac & Chambers	8.63	ES
CC	Reunion – W of Tower Rd, N of 104 <sup>th</sup>	10.1	ES
CC	Reunion – Southlawn – S of 104 <sup>th</sup> Ave, E of Buckley	10.6	ES
CC	Reunion – NE of 96 <sup>th</sup> & Buckley	48	HS
CC	Villages at Buffalo Run East – E of Chambers, ½ mi N of 112th	5.01	ES
CC	Second Creek Farm (7.5) / Buffalo Highlands (7.5) – W of Tower Rd, ½ S of 96 <sup>th</sup>	15	ES
TH	Sage Creek (5.03) / The Highlands (4.931) – ½ mi E of Holly, S of 128 <sup>th</sup> Ave	9.96	ES
TH	North End Station – N Hwy 7 between Holly & Colorado	10	ES
TH	The Parterre – N of E470, E of Quebec	20	MS
TH	The Parterre – S of E470, W of Quebec	10	ES
TH	Willow Bend – W of Holly, N of 144 <sup>th</sup> Ave (new addition)	10.13	ES
	<b>Total Acres</b>	<b>237.38</b>	

## **Facility Leasing**

District facilities are used by a number of entities for non-school purposes. The largest groups of users for non-school purposes are local municipalities. These uses are largely governed by intergovernmental agreements (IGA) executed by the parties. Users in this category are exempt from fees. The District also allows for the use of its facilities on a fee basis for other profit and not-for-profit organizations. A second category made up of non-governmental groups that served District students was previously exempt from fees. Pursuant to a staff recommendation, the Board eliminated all exemptions except for those governed by existing IGA's and instituted a reduced fee for the previously exempt groups. The purpose of the change was to assist in the recovery of the costs of administering the building usage program.

The chart below illustrates the revenue assessed by fiscal year.



Staff will continue to monitor revenues from the lease and use of District facilities and will work to maintain a balance between allowing community use of facilities without placing the financial burden of such leases on the District and/or the instructional process.

The leasing of District outdoor spaces has not been previously regulated within our existing processes. Given the growing demand for these requests, the District is contemplating the central management of these spaces.

## **Data Processing Equipment**

The District owns and operates a fiber-based switch network to provide broadband voice and data communications between facilities. The District also owns and operates an integrated telephone switching system that includes a primary District-wide phone switch with voice mail and individual sub-switches in school buildings. The District ensures protection of these systems through qualified vendor maintenance contracts. Contract specifications assure high availability of service and spare equipment to maintain a high level of performance in each system. The current amount of fiber maintained is approximately 40 miles, 22 phone switches, and 225 data switches.

District staff monitors and is notified of any disruptions of these critical systems and have implemented the following support standard:

Maintain an operational availability (uptime) of 97% during the normal business hours of the District. (7:00 AM - 4:30 PM, M-F)

All systems are currently being monitored, either via automation or manually, and have a 99.3% average operational availability this year.

The District has in place maintenance contracts on the building level switches and phone equipment installed in the District. The District also keeps a parts inventory to be able to make repairs and replace damaged equipment in a timely manner.

The District continues to monitor, correct, and protect from any damage that may occur to the fiber network and has established relationships with multiple vendors to expedite any repair work that may be needed.

### **Computers**

There are approximately 4,218 devices within the District.

Four hundred student computers were replaced within the past year with another 400 scheduled for purchase in FY 2016. A similar number will be replaced in future years. This plan will ensure that no computer within the District will exceed five years of age. The newest computers will continuously be placed in high schools, and the older computers “cascaded” downward through the grades where less computing capability is required.

Teacher computers have been replaced with less expensive thin client computers. All costs for central administration replacements will be absorbed through building/departmental budgets.

This plan requires full and continuous implementation. Failure to do so may result in the loss of access to fully operable computers for our students and staff.

### **Telephone Systems**

Currently the District operates on three telephone systems: one is 18 years old, one is ten years old, and the other is three years old. The oldest system is at full capacity, cannot be expanded, and is rapidly becoming obsolete. An upgrade project utilizing components compatible with our current systems has been postponed due to lack of funding.

### **Technology Maintenance Schedule**

Currently the District sets aside one weekend each month to perform preventive maintenance/updates on all hardware and software the District has in its production environment.

### **Vehicles**

The District’s vehicle fleet consists of 92 motorized vehicles (pickups, tractors, and mowers) in the white fleet and 117 transportation vehicles including full size buses and Micro Birds. Maintenance services and inspections are performed by certified mechanics on all vehicles at the Main Transportation Terminal.



A current review of the mileage of the transportation fleet indicates that 11 of the buses have mileage that exceeds 300,000 miles - two (2) buses have mileage in excess of 400,000 miles. An additional 11 buses have mileage in excess of 200,000 miles. High mileage buses remain on the fleet to provide additional student capacity but are restricted to low mileage in-district routes.

The State of Colorado does not have a standard bus replacement schedule based on the age of the vehicle due to the fact that Colorado is not considered a high rust state. Industry standards suggest replacement at 350,000 miles on a diesel engine due primarily to new emission standards and 250,000 miles on propane engines.

The District has made significant investments in this area over the past few years with the replacement of 11 buses and the addition of 18 buses in 2012, two (2) buses in 2014, and eight (8) buses in 2015.

The chart below compares the mileage of the fleet over the past four years:

<b>Mileage</b>	<b>2012 Number of Buses</b>	<b>2013 Number of Buses</b>	<b>March 10, 2014 Number of Buses</b>	<b>February 2015 Number of Buses</b>
400,000+	1	1	1	2
300,000- 399,000	11	11	11	11 (all 340,000+)
200,000- 299,999	6	7	7	11
100,000- 199,999	22	29	37	34
50,000-99,999	24	15	19	18
0-49,999	35	44	34	41
<b>Total</b>	<b>99</b>	<b>107</b>	<b>109</b>	<b>117</b>

In order to maintain the current size of the fleet and adhere to industry replacement standards, thirteen busses would need to be replaced within the next budget cycle. In addition to replacement buses, staff anticipates an ongoing need for three busses annually to accommodate student growth.

The District's student transportation vehicles are regulated by the Colorado Minimum Standards Governing School Transportation Vehicles as developed by the Colorado Department of Education. The standards provide requirements for the annual inspection of vehicles used to transport students. The annual inspection requires a certified bus mechanic to follow an extensive checklist on the vehicle including damage to vehicles and brake and drive train inspections. If a vehicle fails inspection it cannot be used to transport students until repaired and re-inspected. After the re-inspection, the certified mechanic must sign a CDE required affidavit stating that the vehicle has been repaired, re-inspected, and is safe to transport students. This affidavit must be kept in the vehicle.

A maintenance and inspection record is established for each vehicle upon purchase and maintained until the vehicle is retired. A review of maintenance records indicates that all student transportation vehicles have been adequately maintained according to state statute and CDE regulations. A similar review of the

Preventive Maintenance Status report indicates that all white fleet vehicles have also been reasonably maintained.

A certified bus mechanic is required to have at least two years of maintenance experience on light, medium, and heavy duty vehicles. The mechanic must pass a written and hands-on performance test initially, and is re-tested every three years. Mechanics participate in a variety of training opportunities to assist in their certification efforts. Documentation regarding mechanic certification is maintained at the Main Transportation Terminal.

**Summary**

While District staff has made every effort to utilize existing resources as efficiently as possible the lack of financial resources available to support the District’s facilities and equipment does not allow for reasonable life cycle replacements and/or sufficient maintenance of the District’s physical assets. The lack of resources is negatively impacting District facilities, vehicles, safety and security items and technology equipment as well as other District infrastructure. Based on the data provided, a report of non-compliance is warranted.

**Conclusion: I report non-compliance.**

**The Superintendent will not:**

- 3. Operate without employing risk management practices to minimize exposure of the organization, its Board, or staff to claims of liability.**

*I interpret exposure as potential vulnerability to legal claims.*

*I interpret liability as legal judgments and costs. This is interpreted to mean that the Superintendent shall have in place reasonable processes, policies, and procedures with the intent of mitigating claims of liability against the District or its employees.*

**Data Reported**

The District is protected under the statutes of the Colorado Governmental Immunity Act to a maximum of \$350,000 per individual and \$990,000 per occurrence for liability exposure.

As of March 3, 2015 there are five claims outstanding for the District.

<b>Claim Type</b>	<b>Status</b>	<b>Description</b>	<b>Date</b>
Collision	Open	OV turning left struck IV in driver’s side	2/26/15
Collision	Open	Bus pulled from intersection and struck OV	12/15/14
Collision	Open	OV rear-ended another vehicle resulting in a 4-car collision	12/12/14
Property Damage	Open	Bus pulled from intersection and struck OV	12/15/14
Property Damage	Open	Toilet line broke in two boys’ restrooms	1/6/15

In addition to the information garnered from the annual financial audit, the District has in place numerous Superintendent policies designed to mitigate claims of liability against the District. These policies include, but are not limited to, the following examples:

ACE-E1	Notice of Non-Discrimination
BCB	Board Member Conflict of Interest
DJB-R	Purchasing Procedures
EBB	Accident Prevention Safety
GBAA	Sexual Harassment
JLIA	Supervision of Students
KDE	Crisis Management
LC	Conducting Education Research

**Conclusion: I report compliance.**

**The Superintendent will not:**

- 4. Allow any purchase wherein normally prudent protection has not been given against conflict of interest.**

*I interpret prudent as shrewd and cautious as applied to action or conduct.*

*I interpret protection as having reliable processes to prevent an undesirable end.*

*I interpret conflict of interest as a financial conflict between the private interests and the official responsibilities of a person in a position of trust.*

**Data Reported**

In the Comprehensive Annual Financial Report presented to the Board on February 12, 2013, the auditors identified no conflicts of interest in their tests of data in the District. In addition to the information garnered from the annual audit, the District has in place Superintendent Policies designed to eliminate potential conflicts of interest. These policies include:

DJG	Vendor Relations
GBEA/B	Staff Conflicts of Interest and Ethics

**Conclusion: I report compliance.**

**The Superintendent will not:**

- 5. Allow the purchase, disposal, or lease of real estate or personal property valued at more than \$20,000 without having obtained comparative prices through a fair vendor bidding process with supporting documentation.**

*I interpret having obtained to mean seeking and acquiring.*

*I interpret comparative prices and quality to mean two or more written bids on all single item or single service purchases.*

## **Data Reported**

There were two leases of real estate valued in excess of \$20,000 since last year's report. They are as follows:

- 1.) As disclosed in last year's report and approved by the Board of Education on September 24, 2013 the District entered into a lease with New Cingular Wireless PCS, LLC (formerly AT&T) for a 900 square foot site near Vikan Middle School and Ron Cox Field. The final lease was not executed until August 24, 2014 and as such is being recorded in this year's report.

New Cingular Wireless PCS, LLC is still in the permitting process with the City of Brighton. The construction timeline is unknown.

The District was not seeking to lease this property but approved the lease as an opportunity to gain revenue and offer a community service without reducing our ability to provide services.

- 2.) The Board of Education, upon recommendation by staff, approved on May 27, 2014 the lease of an additional 3,414 square feet within the Brighton Learning and Resource Campus for the District's Brighton Online Learning for Tomorrow (BOLT) program and the new Bridge Academy program.

The District sought out the lease at this particular location due to its proximity to existing District programs; no other site provided this opportunity and no comparative bids were solicited.

For the period of July 1, 2014 through February 28, 2015 there have been approximately 129 individual checks written and 49 purchasing card payments with values in excess of \$20,000 representing a total cost in excess of \$11,700,000.

These checks and purchasing card payments are made for a variety of purposes and under varying conditions. Many of the checks are written based on long or short term contracts for certain operational and educational services (i.e. Andrews Food Service System, Kaiser Permanente, Brighton Education Association and charter schools). These types of contracts are all negotiated based on a bid or sole proprietor basis.

Other checks and/or purchasing card payments in excess of \$20,000 cover items such as utility costs (i.e. United Power, City of Brighton, and BP Energy Company).

The last category would include specific agreements to acquire certain products and services. These types of expenditures would include construction design and services; technology design, services and equipment; and other assorted material and equipment purchases. In these cases, department heads are required to seek competitive bids and retain documentation of such bidding processes. A cursory review of these documents indicate that staff is in compliance with this executive limitation.

In all cases, department heads are required by Superintendent Policy to seek competitive bids for purchases in excess of \$20,000 and retain documentation of such bidding processes. These policies include:

DJE Bidding Requirements  
FED-R Construction Contracts Bidding and Award

Schools are encouraged to make purchases using a District purchasing card (p-card). If a school wants to use a purchasing card to make a purchase in excess of \$25,000 prior approval from the Chief Financial Officer is required.

**Conclusion: I report compliance.**

**The Superintendent will not:**

**6. Engage in design, construction, or any other aspect related to development of real property including financing or payment for such services, without obtaining comparative prices through a fair bidding process with supporting documentation.**

*I interpret comparative prices to mean two or more written bids.*

**Data Reported**

In preparation for the 2014 School Construction Bond Election, staff conducted fair comparative bidding processes to select parties related to the financing, design and construction of facilities contained in the bond request.

A list of those processes is as follows:

**2014 Bid Services Report**

Financial Advisors	April 2014
High School #3 CM/GC Services RFQ *	May 2014
Elementary School #12 Design Services RFQ	May 2014
Pre-Bond Program Management RFQ	June 2014
High School #3 CM/GC Services RFP *	August 2014
High School #3 Geotechnical Testing RFP (e-mail)	October 2014
Owner's Rep/Project Management Services RFQ/P	October 2014
Elementary School #12 CM/GC Services RFQ*	November 2014

\* Construction Manager/General Contractor

Supporting documentation for the processes is maintained by the appropriate departments.

**Conclusion: I report compliance.**

**The Superintendent will not:**

**7. Allow the Board to be unaware of the acquisition, encumbrance, lease, or disposal of real estate valued at more than \$20,000 without providing the Board with information for discussion prior to a final decision being made.**

*I interpret providing the Board with information to mean distributing relative and pertinent facts to all board members through either verbal or written methods of communication.*

*I interpret for discussion prior to a final decision being made to mean the Board is in receipt of such information prior to the establishment of the next Board agenda.*

### **Data Reported**

The Board received multiple advisements of the two real estate transactions itemized in #5 above with ample time for discussion prior to a decision being made.

### **Conclusion: I report compliance.**

#### **The Superintendent will not:**

#### **8. Fail to protect intellectual property, information, and files from loss, improper access, or significant damage.**

**a) The Superintendent shall not fail to maintain records in a manner consistent with a Records Retention Schedule established in accordance with recommendations from legal counsel.**

*I interpret intellectual property, information, and files to mean the electronic data stored on the District servers and hardcopy records retained and used by the District for District administration and school site level purposes both original and not.*

*I interpret significant damage and loss as the inability to utilize the resource.*

*I interpret improper access as access to a resource that is not approved or allowed.*

### **Data Reported**

#### **Significant Damage and Loss**

File backups, including multi-site storage, are conducted on a daily basis. Backup logs show that the automated and manual backups are completed 99.6% of the time. These backups are regularly tested to make sure that the data can be restored if needed in the future.

Industry best practice system redundancies, advanced Redundant Array of Inexpensive Disks (RAID), N+1 configurations, and replication of data have been implemented on all critical servers and systems. The District utilizes a Storage Area Network (SAN) device to protect the data at a rate of over ten times the normal protection of a standard server system and to support a disaster recovery model in case something catastrophic happens to the District data center.

The District also utilizes a system called “Virtual Servers” to help lower the operational costs of these servers and also to help spread the data out over multiple physical servers to make sure that it is more protected and easier to backup and restore.

This District also has an emergency power generator at the data center to protect from power loss for an extended period of time. This generator is powered by natural gas so that it requires less maintenance than a traditional diesel generator. This generator is tested weekly to make sure that it is performing properly.

## **Improper Access**

A firewall has been erected around the entire District data network to protect against damage due to unauthorized access. No unauthorized access has been seen on the District network. Regular review and compilation of security logs and automated alert systems notify staff of any unusual activity on the network so that it can be corrected immediately. No security breaches have been detected in the District.

Internet content filters have been deployed to guard against misuse of District computer and network assets. These include standard web-based filters as well as network filters.

User IDs and passwords are required for access to the network and to assign security credentials for access to sensitive systems.

## **File Retention**

The District's established records retention schedule, based on the recommendation of District legal counsel, is to accept the current Colorado School District Records Management Manual as prepared by the Colorado State Archives on September 25, 2007.

The District has obtained approval from the Colorado State Archives to use this retention schedule. This schedule is based on federal and state laws.

The District records retention schedule includes multiple sections that are audited on a regular basis, both hardcopy and electronic, to make sure that the District is maintaining records according to this schedule. The District is currently in compliance with the records retention schedule.

The District also utilizes an industry best practice email archive system to make sure that all emails, both incoming and outgoing, sent through the District email system are stored for electronic discovery requests.

**Conclusion: I report compliance.**

**The Superintendent will not:**

- 9. Receive, process, or disburse funds under controls insufficient to meet the Board-appointed auditor's standards.**

*I interpret this to mean that the District manages money and money-related transactions using a system of internal controls, which provide for separation of duties, fraud protection, and an authorization process providing reasonable assurance that appropriate controls exist. This is reasonable because independent auditors review these controls on an annual basis and report their findings to District administration and the Board of Education.*

## **Data Reported**

The Local Government Audit Law (C.R.S. 29-1-601 et seq) requires the District to have an annual audit of their financial statements. The law states that the audit must be performed by an independent Certified Public Accountant (CPA) and be in accordance with generally accepted auditing standards. The Comprehensive Annual Financial Report (CAFR) is published to fulfill that requirement, and

according to Section 29-1-606, C.R.S., financial statements must be approved, published, and submitted to the state auditor within six months of the close of each fiscal year. The District management assumes full responsibility for the completeness and reliability of the information contained in the CAFR, based upon a comprehensive framework of internal control that it has established for this purpose. The independent CPA publishes a management letter providing adding information on internal control and providing suggestions for improvement.

The auditors presented no additional finding information in the FY 2014 financial and A-133 audit which was presented to the Board of Education at the December 9, 2014 meeting.

**Conclusion: I report compliance.**

**The Superintendent will not:**

**10. Compromise the independence of the Board’s audit or other external monitors or advisors. Engaging parties already chosen by the Board as consultants or advisers is not permitted.**

*I interpret audit or other external monitors or advisers to mean entities which are independent of School District 27J who perform a professional service to the Board of Education in a contractual or informal manner.*

*I interpret engaging parties already chosen by the Board as consultants or advisers is not permitted to mean that the Superintendent or his designees are forbidden from entering into any relationship that would diminish the integrity of the Board’s prerogative to independently seek input.*

*I interpret this to mean that the Superintendent of schools will put into place policies and protections that would prohibit internal processes which would directly or inferentially compromise the integrity of external information being presented to the Board of Education for the purposes of substantiation of presented data.*

**Data Reported**

This past year the Board of Education of School District 27J entered into only one external contractual agreement. This agreement was with CliftonLarsonAllen, LLP for the District’s annual audit. Staff did not engage CliftonLarsonAllen, LLP or any other consultants or advisers used by the Board of Education.

**Conclusion: I report compliance.**

**The Superintendent will not:**

**11. Invest or hold operating capital in unsecure instruments or in non-interest-bearing accounts except where necessary to facilitate ease in operational transactions.**

*I interpret this to mean all cash owned by the District is deposited in accounts with the highest levels of safety as follows:*



- a. Cash is deposited in accounts where the District holds title to market value collateral representing obligations of the US Government; and
- b. Cash is deposited in institutions participating in a pooled US Government security collateral arrangement in accordance with the Colorado Public Deposit Protection Act (CPDPA); and
- c. Cash is held in public entity money market funds organized under authorizing Colorado law, having the highest credit rating assigned by a nationally recognized credit rating agency.

**Data Reported**

All funds are invested according to the Colorado Public Deposit Protection Act. This statute specifies investment instruments meeting defined rating maturity and concentration risk criteria. The District has adopted an investment policy which is more restrictive and limits investments to the following:

- Obligations of the US and certain US Agency securities
- Written repurchase agreements collateralized by certain authorized securities
- Certain time certificates of deposit of savings accounts in state or national banks
- Certain time certificates of deposit of savings accounts in state or federally chartered savings and loans
- Certain money market mutual funds
- Local government investment pool

ColoTrust (Colorado Government Liquid Asset Trust) was established for local government entities in Colorado to pool surplus funds and is registered with the State Securities Commission. Pools operate similar to a money market fund and each share is equal in value to \$1. Investments of the pool consist of US Treasury bills, notes and note strips, and repurchase agreements collateralized in connection with the direct investment and withdrawal functions of the pool. Substantially, all securities owned by the pool are held by the Federal Reserve Bank in the account maintained for the custodial banks. The custodian’s internal records identify the investments owned by the District. Due to their high liquidity, these funds are classified as cash equivalents for reporting purposes. The trust is rated AAA by Standard and Poor’s.

Investments organized by investment instrument consist of:

<b>Investment</b>	<b>Amount at February 28, 2015</b>	<b>Interest Rate at February 28, 2015</b>
ColoTrust	\$13,011,456	.13%
CSAFE	\$ 1,258,673	.13%
Wells Fargo Trust	\$ 3,295,734	.01%
<b>Total</b>	<b>\$17,565,863</b>	

As of 2/28/15:

ColoTrust Trust & Agency Fund 74	\$ 40,022	
ColoTrust Activity Fund 23	1,139,143	
ColoTrust Impact Fund 26	61,245	
ColoTrust Building Fund 41	264,870	
ColoTrust General Fund 10	11,506,176	*
ColoTrust Total	\$13,011,456	0.13%
CSAFE Pupil Activity Agency	\$ 271,547	0.13%
CSAFE Nutrition Special Revenue Fund	\$ 987,126	0.13%
Wells Fargo Trust - Debt Fund	\$ 3,295,734	0.01%

\* This includes all other funds that do not have separate accounts.

**Conclusion: I report compliance.**

**The Superintendent will not:**

**12. Endanger the organization’s public image, its credibility, or its ability to accomplish Goals.**

*I interpret public image as inclusive of the opinions and perceptions of the taxpaying public at large, governmental entities, and private companies that assist in the development of District assets, including facilities and equipment.*

*I interpret credibility as maintaining high public trust as ethical stewards for the community.*

*I interpret to accomplish goals as meaning the District's image will not detract from the organization’s ability to meet the goals.*

**Data Reported**

Within the realm of Asset Protection, the entities that assist in the development of District assets enter the system primarily through Facilities, Construction Management, and Technology. There are many other entities that provide services or supplies to the District (curriculum, office supplies, consultants, etc.) that do not necessarily fall under Asset Protection. Other data related to the organization’s public image, credibility, and ability to accomplish goals will be reported in Report 3.A – Treatment of Students/Public.

In order to ascertain private business and government officials’ perception of the District’s public image, credibility, and/or its ability to accomplish goals, a survey of each group was conducted. A confidential on-line survey service was used to send a survey to private businesses, government officials, and other community leaders that may have had contact with our Facilities, Construction, and/or Technology Departments.

Forty-four surveys were e-mailed to private contractors who submitted bids to perform services in a variety of construction projects. Twenty-four responses were received.

The survey questions and results are as follows:

Do you feel you were treated fairly in the opportunity to bid?

Yes - 22      No - 2

Do you feel you were treated equitably (with impartial treatment) once the bids were received?

Yes - 21      No - 3

If you were awarded the project, do you feel you were treated well while doing business with SD27J?

Yes - 16      No - 0      N/A - 8

Comments:

- We have always been treated fair.
- Unfortunately the carpet specified is a product we are not given fair pricing therefore we did not bid the project.
- I have no way of knowing (if we were treated equitably). I can only hope that whoever makes the decision is awarding bids considers credentials of said contractor, price, quality of work, experience, timeliness, customer service, etc...and price not being the sole deciding factor.
- We were not really able to find out why we were not shortlisted. We would really have appreciated a debrief.
- We have no idea of how we ranked or scored in comparison with other architectural firms.

An email survey was sent to 29 government officials and/or community leaders. Seven responses were received. The survey questions and results are as follows:

Does the District maintain a positive public image?

Yes -7      No - 0

Does the District build positive relationships with your organization?

Yes -7      No - 0

The following question was asked, and the responses have been compiled:

How can the District collaborate with your organization to sustain a positive public image?

Responses:

- The Board of Education meets with city council on fifth Tuesdays.
- Communication could be better, but overall I think the district tries to maintain a good public image.
- The district has always been excellent to work with. I am very happy with our relationship and teamwork in dealing with the many issues we share.

## **Communications**

School District 27J continues to look for opportunities to expand its communication tools to reach parents and the community. Current efforts include the publication of the electronic newsletter, the *27J Compass*, which highlights various District news items and events. The district's Facebook page and Twitter site are popular resources for carrying School District 27J's message to a broader audience. The

District also added a semi-annual publication called the District 27J Educator. This publication, which is sent home with all elementary and middle school students and emailed to parents of high school students, highlights news and events from across the district.

In 2014, the district transitioned to a new, more user-friendly website platform, which has received positive feedback from the community. The district has also implemented a new Silver Pass program, where district residents who are 55 and over can receive a free, re-useable card that gives them access to district sporting and athletic events. The district is currently exploring a possible partnership to provide video services to the district, which would be another great way to highlight the district.

**Conclusion: I report compliance.**

**The Superintendent will not:**

**13. Change the organization's name or substantially alter its identity.**

*I interpret the organization's legal name to be Adams County School District 27J, Adams/Weld School District 27J, and Brighton School District 27J commonly referenced as School District 27J. I interpret this to mean that the Superintendent of Schools is prohibited from the initiation of any organizational process or the direction of any staff member to put into place any procedure that would substantively alter the District's common and/or legal name. I interpret this to mean the Superintendent shall not put into place or implement any strategy which would subsequently modify the historical or local identity of the school District as a public K-12 system within the state of Colorado.*

**Data Reported**

During the past calendar year the Superintendent took no action to change the organization's name or alter its identity.

However, it should be noted that the Board of Education, on August 27, 2013, approved a resolution adopting School District 27J as the unofficial name of the District. The action was taken to provide clarity and consistency in publicly released reports, documents and in communication with its various communities.

This action was endorsed by the Superintendent, and it would be his further recommendation that any potential future initiatives to change the identity of the District remain within the purview the Board of Education and subject to an official vote of the Board of Education to avoid any report of non-compliance in this area.

**Conclusion: I report compliance.**