

Operational Audit and Written Report of Findings for Alma D'Arte Charter High School

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The Operational Audit took place between July 23, 2019 and August 9, 2019. The purpose of this project was to conduct a thorough review of operational and Governing Council practices, policies and systems of the school. In addition, the review entailed examining and evaluating academic structures, systems and policies to support Special Education students and English Learners.

The following documents were supplied to me to review: Charter School Division (CSD) Site Visit Reports from October, 2018 and April 2019, Corrective Action Plans (CAP) submitted by the school, beginning January 2019, reports from the Special Education Bureau and the Language and Culture Bureau, and correspondences from and between the Public Education Commission (PEC) and the School. I also reviewed minutes from Public Education Commission meetings from November, 2018 – June, 2019. In addition, I attended a meeting with representatives of the School and members of the Special Education Bureau on July 26 at the PED. On August 7, I conducted a site visit at the school where I met with the Governing Council President (Gene Elliott), the school's new Head Administrator (Dr. Dan Lere), and the Special Education and ELL Coordinators. During this visit I reviewed all requested documents (listed in Governing Board Section) and was also provided with Agendas and Minutes from the 2018-2019 school year. Prior to my site visit, I reviewed the school's Bylaws.

For the purposes of this review, I have constructed charts that summarize the concerns and items that needed to be addressed for each area: Education Plan: English Language Learners; Education Plan: Students with Special Needs; Governance & Reporting: OMA, Policies and Training, and Governance & Reporting: Evaluation of Head Administrator. Summaries of my findings precede each chart.

Other information to note: There are presently 135 Students this year. This number has been building as only 118 were registered when school began. About 25 students are new to the school. The school is fully staffed with teachers with the exception of one Special Education Teacher. Dr. Lere is currently interviewing for this position, and hopes to fill it in the near future. Dr. Lere and the EL and Special Education Coordinators are new to the school this year. The school does not presently have a Chief Procurement Officer, but the Head Administrator is presently enrolled in courses so he can take on that role. The school does not presently have a STARS Coordinator. The Head Administrator is consulting with staff at the PED to learn STARS and will share this knowledge and responsibility with other appropriate staff, including the EL and Special Education Coordinators.

Education Plan: English Language Learners

SUMMARY

In January 2019, the school submitted a Corrective Action Plan to the Public Education Commission to address the PEC's concerns in the area of identifying, serving, assessing and monitoring English Language Learners. The PEC found that this CAP lacked specificity and noted ongoing concerns about the school's inability to adequately address the deficiencies. A subsequent document addressing the CAP items was submitted by the school in March, and was reviewed by the Language and Culture Division staff. In April, the CSD conducted a site visit. Both the Language and Culture Division staff and the CSD April Site Visit team revealed similar concerns surrounding identifying, servicing, notifying and assessing English Learners, as well as monitoring those students who have been exited. In a document the school later submitted titled "CORRECTIVE ACTION PLAN TO ADDRESS CONCERNS DRAFT Updated April 16, 2019," the school addressed the concerns in the areas identified by the PEC, the Language and Culture Division, and the CSD. In addition to addressing the concerns stated, the School presented a comprehensive Training and Professional Development Plan in this April DRAFT CAP. The information presented in the updated CAP was detailed and comprehensive, including actions, timeframes and responsible parties, and appears to be in alignment with rules stated in the Charter School Division April Monitoring Instrument Item Report and in the review from the Language and Culture Division.

August 7 Site Visit: The EL Coordinator is new to this position. He had previously been teaching Spanish. At this visit, we reviewed the 4/16 CAP, which Dr. Lere and the EL Coordinator were not familiar with. Dr. Lere had a binder with what appeared to be a few renditions of the CAP that the previous HA had submitted (or was going to submit) to the PEC. The 4/16 CAP appeared to be the final draft. Although the EL Coordinator was unfamiliar with this latest CAP, he has already taken steps that are in alignment with it. He has begun to identify the EL status of the new students by reviewing old cum files (there are approximately 14 new students – all from within the state), and will work to learn STARS so the appropriate screens can be reviewed, as well. Notification letters were sent to all students who are eligible for support/services and filed in student cum folders. He has begun providing services per the information he presently has, and will continue to work with students to assess if more support is needed. As the need grows, the level of services and supports will "grow" as well.

See supporting details below.

Alma response to 3/21 PEC Notice of Concern for Noncompliance	3/31 Language and Culture Division Review of School's Response	4/8 CSD Site Visit Report	4/16 ALMA Updated CAP	8/19 Visit
<p>Language Usage Survey – Identify English Language Learners:</p> <p>The School conducted a review of all student files and STARS, and identified 14 “potential” Els.</p> <p>They contacted previous schools for more information, and stated they were up to date with all EL potential identifications.</p>	<p>No Language Usage Survey (LUS) or STARS data is available.</p> <p>If LUS was given, the use WIDA Screener administered to determine Language Proficiency was not evident.</p>	<p>Documentation of ELL Eligibility of students for transfer and/or original HLS/LUS forms was not available in 5 student folders. School officials stated they did not know how to use forms.</p> <p>Eligibility could not be confirmed through STARS, and STARS research was not done to attempt to fill in the form.</p> <p>School-created Home Language Survey (HLS) forms were given to students who were not new to the state.</p>	<p>The CAP appears to address issues in this area. The School requests records from prior schools and reviews the Student Display screen-Assessment Facts in STARS. Information is documented and placed in student cum folders in lieu of the LUS. Students new to New Mexico are given the state-approved LUS.</p> <p>Students in need of language assistance services will be identified and parents notified within 30 calendar days after the beginning of the school year, or within two weeks of initial enrollment if not enrolled at the beginning of the school year.</p>	<p>STARS reports and review of student folders have not been accessed. There is no STARS Coordinator as the previous coordinator recently left this position. Dr. Lere has been taking care of reporting since the departure of the previous coordinator. The Code will be given to new EL Coordinator to check into STARS to find other information. Dr. Lere will work with him to become familiar with STARS and screens as well as determining if students had been exited.</p>
<p>English Language Proficiency Screening Assessment:</p> <p>The school will use ACCESS online, the WIDA Screener, and compare scores to STARS data.</p> <p>The School will annually administer the WIDA</p>	<p>The school demonstrates confusion about the WIDA Screener and ACCESS - when they are administered and how they are used:</p> <p>The ACCESS Test on line is stated as assessment to determine language proficiency, but the WIDA</p>	<p>Use of the WIDA Screener and ACCESS was not specifically addressed in this report, however, the CSD team explained the process to the then Head Administrator, several Governing Board members and at least three staff members. The school's major responsibilities or steps regarding ELL status were listed on the Site Visit Monitoring</p>	<p>Use of the WIDA Screener and ACCESS was sufficiently addressed in the CAP.</p> <p>For students with an answer on the LUS that is other than English, the Registrar will notify the ELD Coordinator who will screen the student using the WIDA Screener.</p>	<p>CAP adequately addresses the concern of confusion about WIDA Screener and ACCESS administration. The new EL Coordinator had a clear understanding of the difference between the WIDA Screener</p>

<p>Screener ACCESS for students who have not yet tested out of EL service.</p> <p>The NMAPA or Alternate ACCESS Test for ELs will be administered to students with severe cognitive disabilities until they are proficient.</p>	<p>Screening is the assessment.</p> <p>Use of ACCESS for Ells given to “potential” learners, but it is used for all current Ells.</p> <p>Exit criteria for ACCESS for ELLs is incorrect.</p> <p>Alternate ACCESS assessment for students with severe disabilities is administered (not ACCESS or NMAPA as stated by school).</p>	<p>Instrument Item Report.</p> <p>The April 2019 visit did not address the area of students with cognitive disabilities and the Alternate ACCESS Assessment.</p>	<p>Students with cognitive disabilities who also take the NMAPA Assessment can take the Alternate ACCESS Assessment if this is specified in their IEP.</p>	<p>and ACCESS as well.</p>
<p>Screening and Assessment: Parent Notification:</p> <p>The school’s response states parents will receive results of the WIDA ACCESS administered March 5-8, 2019, and a notification of letter of English Learners upon initial identification and annually thereafter.</p>	<p>The timeframe for the notification letter of Ells upon initial identification was not stated.</p> <p>Initial notification letters must be sent home within the first 30 days of the beginning of the school year, or 14 days after registering a student during the school year.</p> <p>ACCESS for ELLs results – where these results are stored is not stated.</p>	<p>An Initial notification letter was provided, but not an annual one.</p>	<p>The CAP adequately addresses the use and storage of the Notification Letters. Samples were provided in both English and Spanish.</p> <p>Parent notification is prepared by the ELD Coordinator and sent home by the Registrar with WIDA Screener results, program recommendations, and available program and service options. An option to opt out of EL services is included in the notification. Students and parents/guardians are notified of placement status within 14 days of WIDA administration.</p> <p>ACCESS is given annually until or unless the student scores a 5.0 or better.</p> <p>Parents will be notified</p>	<p>Copies of Annual Notification letters were produced with ACCESS scores. Notice to OPT out of Participation in EL program and/or Language Support Services were produced as well as a letter to opt-in. Copies are placed in the Student Com. Folders.</p>

			<p>annually that their student is eligible for EL services, services offered by the school, and an option to opt out. Annual WIDA ACCESS scores will also be provided.</p> <p>All information stated above, including progress-monitoring documents for exited students, are filed in student cum folders.</p> <p>Samples of Notification Letters were submitted with the June 4 school's correspondence to Commissioner Gibson.</p>	
<p>English Learner Programs: Linguistic and Cultural Support for EL Learners:</p> <p>School describes how it is supporting "potential" students until students are proficient.</p> <p>School states it is offering ELD self-contained courses for Math and ELA.</p> <p>ELA-ELD integrated classes are co-taught.</p> <p>ELA teacher (TESOL endorsed) pushes in to support other ELA and Math teachers for ELD.</p> <p>Program also includes Maintenance Bilingual Spanish.</p>	<p>Statement about how "potential" students are supported – use of the word "potential" unclear.</p> <p>Alma offers ELD self-contained courses for Math and ELA – it is unclear how these classes are helping students to attain English language proficiency and learn class content while still learning English.</p>	<p>There was no evidence of ELD services being provided.</p>	<p>For students identified as EL's and who have not opted out, they will be placed in either the Beginner (Levels 1-2) or Intermediate/Advanced Levels (Levels 3-4) ELD Courses.</p> <p>Students who have an overall composite of 5.0, or better on ACCESS, will be considered exited EL, and will be placed on a monitoring status for 2 years.</p> <p>The CAP provided a comprehensive description of ELD classes offered to Beginner, Intermediate, and Advanced students</p>	<p>14 students have been identified. Beginner ELD blocks are being provided to 4 students 1.5 hours per day, based upon ACCESS scores. Next week, the EL coordinator will begin to push into classrooms to support students and assess if they need more support. Intermediate and Advanced classes will be developed as needed, and will be taught by ELD Coordinator (who is TESOL endorsed).</p>

<p>Monitoring and Data Analysis:</p> <p>The school previews data-driven platforms, and is currently using Edulastic.</p> <p>Student grades are monitored in PowerSchool and in Advisory.</p> <p>Exited students are monitored for two years after exit through ZAP, progress reports and grades in Power School</p> <p>Domain Specific ACCESS scores are shared with Ell's teachers yearly and compared to previous years.</p>	<p>The School reviewed all files and identified 14 "potential" ELs, and created a list of those to monitor. "Potential" ELs is unclear.</p>	<p>No response from CSD Team</p>	<p>WIDA ACCESS domain- specific scores for ELs will be annually reviewed by the ELD Coordinator. A breakdown of the scores (reading, listening, writing and speaking) will be shared with the teachers who teach that particular student, and that information placed in the student's cum folder.</p> <p>Progress monitoring documents for exited students, are filed in student cum folders.</p>	<p>The ELD Coordinator shared ELD syllabi he developed that are individualized per the needs of each student They are written in both English and Spanish, updated with progress notes, and are shared with both students and parents.</p>
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Education Plan: Students With Special Needs

SUMMARY

In January 2019, the school submitted a Corrective Action Plan to the Public Education Commission to address the PEC's concerns in the area of servicing students with special needs. The PEC found that this CAP lacked specificity and did not adequately address the stated concerns. Subsequent documents were submitted by the school to the PEC and reviewed by the Special Education Bureau, who found continuing issues with the school's proposals. The Commission further requested that the Special Education Bureau review IEPs to determine if the issues had been fixed.

After reviewing all of the information provided by the School, the Special Education Bureau determined the school was failing to provide required special education services, including compensatory services. The review also identified other deficiencies in the development of the IEPs. And, there was insufficient documentation of special education services being provided by the special education teachers.

A meeting was held on July 26, 2019 at the PED Special Education Bureau office. Present at this meeting was the Deputy Director, two Educational Administrators, the Assistant General Counsel for the Bureau, this evaluator, and members of the School. Members of the school included Mr. Elliott, Dr. Lere, the new Special Education Coordinator/Teacher, and the school's legal counsel. The purpose of the meeting was to go over the findings from the IEP review and the report the Bureau submitted to the PEC dated May 4, 2019. The Bureau staff also reviewed the use of service logs to document services. In addition to addressing the findings in the review - concerns, recommendations for compliance, and best practices were discussed. A copy of the report, including the findings and recommendations, was given to the School.

August 7 Site Visit: The Special Education Coordinator/Teacher is new to her position this year and is the only special education teacher on staff. The plan she shared address the above stated issues was confusing and not clearly evident. She provided a schedule of IEP meetings that indicated that IEPs would be conducted 30 days prior to IEP due dates. In order to begin servicing students, she had reviewed all IEPs in an attempt to learn more about the students and their goals, and what services should be provided and where. She stated she is also working with the regular education teachers to learn what their classroom goals are as classroom goals are under-specified on the IEPs. In addition, she stated that information under Present Levels is not specific enough to evaluate the stated goals or to determine "next" goals. She stated that due to incomplete information provided on the current IEPs, she is "working backwards" to determine in what areas students need specialized instruction, and where they need to receive it. Based upon her reviews, she is looking at the percentages listed on the Service Schedules and projecting the minutes that are required for each area of need. She is presently working within the regular

education classroom with all of the students, but her plan is to start pulling students out 30 minutes (more or less) every class to work on specialized instruction as stated on the IEP. She is tracking the time she spends with each student on a service log.

Presently, she does not have a plan to re-do the IEPs that are not in compliance due to lack of time., Dr. Lere is planning to hire another special education teacher in the near future.

Compensatory services still need to be investigated. The school plans to reach out to parents and students to determine if any hours are still needed as no documentation of Compensatory Services (other than service logs that ended in May) have been located.

See supporting details below:

ALMA CAP 1/19 Items	Sped. Bureau Response to the 3/31 CAP	CSD 4/19 Site Visit Report	May 4 SPED report to the PEC of IEP reviews	7/26 Review Meeting with SPED Bureau and School	August Visit
<p>Ensure all IEPs are current and within compliance:</p> <p>The school states that the 30 IEPs are in continuous compliance, and the remaining will be done when they are due. All IEPs will be reviewed and updated for service levels within 30 days of entry.</p> <p>Caseloads will be monitored with calendar and TieNet.</p>	<p>The school appears to making a good faith effort toward compliance, however, the following concerns were expressed:</p> <p>Students are placed to meet the model the school is trying to implement. This is not an IEP Team decision.</p> <p>A systematic process for ensuring the requirements for students with transfer of IEPs is not being met.</p> <p>Services are not tracked via service logs or another method to insure students receive services indicated in their IEPs.</p> <p>Case management is indicated as a special</p>	<p>The IEP files reviewed were up to date.</p> <p>Special education services were being provided by a contracted special education teacher.</p> <p>A schedule that indicated pullout and push-in times to support students was observed.</p> <p>A pull out lab where a special education teacher was working one-on-one with students was observed.</p>	<p>IEPs were reviewed for all students, as were service logs for the Special Education Teacher and Ancillary Staff. The review revealed the following:</p> <p>Students were identified as needing specialized instruction in reading, writing, math, and processing speed as indicated on their IEPs</p> <p>0% of students identified as needing specialized instruction in the areas of reading, writing, math or processing speed were provided with this specialized instruction, as no special education services were indicated on the service pages of the IEPs.</p>	<p>Recommendations for compliance include:</p> <p>Review all IEPs to ensure students are receiving specialized instruction in areas of needs</p> <p>A summary of services and time needs to be documented on PWN.</p> <p>Service logs need to reflect that special education services are being provided in the special education setting, when appropriate.</p> <p>Individual and group time needs to be broken up and tracked</p>	<p>An IEP schedule was produced that reflected IEPs being completed 30 days prior to when they are due. The SPED Coordinator stated she needs 7-10 days to complete each IEP. A plan to redo all IEP's for accurate service schedules has not been developed.</p> <p>All IEPs have been reviewed, She attempting to determine services, and is implementing services per her determination, which is difficult, as current IEP's do not reflect goals, or</p>

<p>Students will receive direct instruction and support services as indicated in each student's IEP. The special education teacher will also co-teach and re-teach in classrooms with a high number of special education students.</p> <p>Special education teachers will also provide support to the general education teacher for special needs students.</p> <p>Progress notes are sent home quarterly.</p> <p>The school also states that all special education students were offered compensatory services (32 days).</p>	<p>education/and or a related service.</p> <p>A system for tracking compensatory services is not apparent.</p>		<p>Compensatory services, owed to students, was not evidenced by service logs.</p> <p>Prior Written Notice did not summarize the schedule of services.</p> <p>Listing Case Management as a Special Education and Related Service of Supplementary Aids and Services is not an accurate use of the term.</p> <p>The majority of services provided were listed as "Individual/Group" and were not broken up.</p> <p>Goals for areas of needs were missing.</p> <p>A need for specialized instruction was not evidenced for all students.</p> <p>Accommodations were listed, but no goals were indicated for the area in which an accommodation was listed.</p> <p>Evidence of progress monitoring of IEP goals was not evident.</p> <p>The school has a model of providing special education support that they fit students into.</p> <p>Service logs do not reflect time spent with students</p>	<p>accordingly.</p> <p>Goals need to be developed for each area of need.</p> <p>Reconvene MDT meetings for students who do not have a documented need for specialized instruction.</p> <p>Progress monitoring needs to monitor IEP Goals.</p> <p>Specialized instruction must be provided to students based on needs – students cannot be "fit" into the school's educational model.</p>	<p>implementation of services.</p> <p>Service logs up until May suggest that all students were caught up with Compensatory hours.</p> <p>Remaining hours for Compensatory services have not been confirmed, and school will check with students and parents to determine if they are missing hours.</p> <p>Service logs are being used. The SPED teacher is doing inclusion now and is indicating how she is spending her time between providing specialized instruction and support for the RE classroom work.</p> <p>The Sped. Coordinator stated ancillary staff use logs, but she is not sure who they submit them to or when.</p> <p>Progress towards goals are not updated on all IEPs. Every report card period – parents will get copy</p>
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			<p>receiving services or how the teacher's time was being spent.</p> <p>The service logs provided indicated that 100% of the special education teacher's time is spent in the General Education.</p> <p>The service logs did not indicate any of the special education teacher's time was spent providing "Individual/Group Setting Math," "Individual/Group Content Mastery" or "Individual/Group Learning Lab."</p>		of the progress.
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Governance

SUMMARY

After completing a CSD site visit dated April 8, 2019, the school was given a deadline of June 7, 2019, to provide the following evidence via upload to the Web-EOSS indicator: Conflict of Interest Policy; Anti-Nepotism Policy; and an action plan for OMA compliance. The action plan was to include the following:

- Action steps, persons responsible, and timelines regarding posting of meeting agendas at least 72 hours in advance of all meetings on the school website and in other locations as outlined in the school's OMA Annual Resolution,
- Providing draft minutes within 10 days of any meeting, and
- Proper nomination/election of officers annually.

August 7 Site Visit: Governing Board documents are not all kept at the school. Agendas and minutes are maintained by Mr. Elliott, who emailed them to me per my request. The Agendas and Minutes that were submitted cover meetings conducted between July, 2018 and July, 2019. Some meetings were Regular Meetings, and some were Special Meetings. Not all Agendas were followed by Minutes, and in some cases, the Minutes were incomplete or did not directly align with the Agendas. Board minutes are recorded and transcribed by either Mr. Elliott or the Board Secretary. A copy of the Agendas and Minutes that were submitted is attached to this report.

A Policy Book with all current Policies, including a list of the Policy Categories and dates of Board Approval, are housed at the school. The Policies that were requested for the purpose of this report were Conflict of Interest, Anti-Nepotism, Grievance or Dispute Resolution for teachers and parents, Student Discipline, Head Administrator ((CAO/Principal) Evaluation, and McKinney Vento Act. Policies were produced for all above areas with the exception of a Grievance or Dispute Resolution Policy for parents and students, which the school does not have. The school adopted the Las Cruces Public School's McKinney Vento Policy and procedures, and maintains a copy at the school. There is no documentation that this policy was adopted by the Board. A copy of the policies that were submitted, including the summary of all current Policy Categories and dates of Board approval, are attached to this report.

A plan for OMA compliance including action steps, timelines and who is responsible including website content and posting was requested. A plan was not produced. An OMA Statement of Compliance was requested. Mr. Elliott stated he remembered signing one, however, he was unable to locate it. He will submit it when it is located. The school was also asked to provide a copy of IPRA logs, receipt of IPRA requests and responses to IPRA requests for timeline for responses. Mr. Elliott stated that in the 15 years he has been involved with the school, he knows of only one IPRA request. According to him, the request was satisfied, but not until a complaint had been filed. The school plans to establish and maintain a log for such requests.

The School's Bylaws were reviewed, and it appears that the Bylaws address many of the concerns stated above. The School does not follow them, however, in many cases.

See supporting details below:

CSD April Site Visit Report: Items of Concern	Review of Bylaws	August 7 Site Visit
<p>The CSD team was unable to review Conflict of Interest Policy and Anti-Nepotism Policies as the Policy Book was at the Governing Board President's house.</p>	<p>Bylaws state the School is the "Office of Record," and that all records of meeting, financial activities, etc. shall be securely housed and available for public inspection at this location.</p> <ul style="list-style-type: none"> • Policy book kept in Registrar's office • Bylaws Amended – List of when policies were amended with Policy Book, some not. 	<p>Copies of the polices given were:</p> <ul style="list-style-type: none"> • Code of Ethics and Conflict of Interest • Nepotism • Meetings of GC – OMA • A Grievance Procedures for Staff , including procedures and a Complaint Form. • Principal Evaluation • McKinney-Vento Policy and Procedures – booklet (Las Cruces Policy) – no evidence that school adopted Las Cruces policies • Orderly Conduct of Meetings (not requested but submitted) • There is no Grievance or No Dispute Resolution Policy for parents
<p>OMA – Public notice and agendas: The school does not post notice of meetings or agendas at the school or on the website at least 72 hours in advance of the meetings. (Parents expressed concerns in both October and April).</p> <p>The 2017-18 Governing Board Observation Form stated same concern.</p>	<p>Bylaws state the GC publishes an announcement each June listing the annual schedule of GC meetings. It states the announcement and schedule shall be posted in a public place at ALMA throughout the year and shall be circulated to all appropriate media used to announce meetings.</p>	<p>Monthly meetings are posted in Public Notice of the Las Cruces News 72 hours in advance. The Website has not been maintained, so there is not a consistent posting of meetings, etc. It is presently being rebuilt.</p> <ul style="list-style-type: none"> • Agendas are posted at the front desk, which is stated in Las Cruces papers. • Mr. Elliott or various staff post the Agenda. • Newspaper and Board members are emailed notification of meetings – there are no venues that are used to notify

		<p>families (i.e.: School Newsletters)</p> <ul style="list-style-type: none"> The school showed three Affidavits of Publication from the Las Cruces Sun-News for the months of April, May and July. The Affidavits are attached to this report.
Notices nor agendas had not posted on the website for this year (up until the time of the site visit)	Bylaws state the Agendas will be published at least 72 hours in advance of each meeting.	The website is currently being overhauled. The use of the Website has been minimal because the website had not been properly maintained.
<p>OMA - Draft minutes of the meetings had not been provided within 10 days of the date of the meeting. The CSD could not complete the Governing Board Observation Form at this site visit as the DRAFT minutes were not available.</p> <p>This was also listed as a concern on the 2017-18 Governing Board Observation Form.</p>		<p>Draft of minutes are not posted per non-use of website.</p> <p>Council and staff members receive a copy of the final DRAFT of the minutes via email with an opportunity to provide input.</p> <p>Mr. Elliott stated the school is presently three meetings behind in posting the minutes. Minutes submitted did not include minutes for May, June, or July. He also stated that DRAFT minutes are not always ready by board meeting. If they not ready by the meeting, the meeting minutes will reflect that. Although this practice may have occurred in some cases, review of the minutes did not indicate that the missing DRAFT minutes were approved at a later date.</p>
Election of Officers: at the January 21, 2019 meeting, the Board President opened nominations for officer positions of Vice-President, Secretary and Treasurer for one year terms. Nominations for President were not requested.	Bylaws state that anyone may nominate a candidate, including him/herself, to fill any vacancy among the GC voting members. Nominations will be made by completion of the official Governance Council Nomination Form and submission to the GC in time for review at a regular or special GC meeting	Mr. Elliott stated that his position had been presented along with the other positions. The January 21, 2019 minutes reflect that this was the case.
Head Administrator Evaluation: The Head Administrator evaluation not yet completed by April 2019 site visit. A faculty survey portion of the evaluation was to occur in early April, and	Bylaws do not address a Head Administrator Evaluation, only the relationship with the Board and who Head Administrator reports to.	According to Mr. Elliott, there is not a consistent form that has been used to evaluate the Head Administrator. The evaluation of the previous Head Administrator by the contracted evaluator

<p>the formal Evaluation in the later part of April. The CSD required the school to provide evidence of a formal, written evaluation of the Head Administrator completed in 2018-2019 no later than June 30. The evidence can be copy of the evaluation, a copy of dated signature page or Board meeting minutes, which include a discussion of the Evaluation of the Head Administrator by the Board</p>		<p>was informal, with no documentation. The Contractor gave the Board impressions of what he observed, and the Board was to develop the evaluation for the Head Administrator.</p> <p>The Head Administrator Evaluation was not identified in Board Agendas or Minutes.</p>
<p>Grievance Process: There had been Parent and Teacher complaint that the Governing Board was not willing to resolve complaints or grievances filed by them. The CSD team required that Dispute Resolution policies for both teachers and parents be uploaded to Web-EPSS, due June 7, 2019.</p>	<p>The Bylaws state the voting GB members serve as the final board of appeal for any grievance filed by faculty or staff that cannot be resolved administratively, and serve as the final board of arbitration with any parent or guardian who has a concern about a student's program and progress and who has exhausted all administrative remedies.</p>	<p>As stated above, the school does not have a Grievance Process or Dispute Resolution Policy for parents. A policy for teachers was submitted. The teachers in the school are unionized, and the union provides this information as well.</p>
<p>Other:</p>	<p>Bylaws – Consultants are engaged upon a majority vote of the GC.</p>	<p>Dr. Dan Lere, who had been a board member resigned from the board. In the minutes dated, under Future Business, he presented the Board with a proposed Personnel Services Contract to serve as an objective operations evaluator with specific objectives related to personnel effectiveness. There are no minutes provided after May 7 to document approval of this contract. During the site visit, Dr. Lere stated he had a copy of the Services Contract, but there was not one at the school.</p> <p>The June Agenda states "Approval of Principal/CAO 2019-2020 Contract." There are no minutes to document approval of this item. Dr. Lere was able to provide a signed contract for this position.</p> <p>The school did not have a Chief Procurement when these contracts were offered.</p>