

# SCSC Monitoring Handbook



State Charter Schools Commission of  
Georgia

Version: FY20

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## Introduction: The Purpose and Types of SCSC Monitoring

Monitoring is one of many tools that the State Charter Schools Commission of Georgia (SCSC) uses to hold state charter schools accountable for acting in a manner that promotes the health, safety and education of all children.

The SCSC is required to annually monitor and review state charter schools and hold them accountable for their performance. O.C.G.A. § 20-2-2083(b)(4) and SCSC Rule 691-2-.03 *State Charter School Monitoring*. Additionally, SCSC monitoring helps to ensure accountability for the proper use of taxpayer funding by state charter schools. Finally, SCSC monitoring promotes high-quality charter schools by identifying concerns and incentivizing schools to correct noncompliance in a timely manner.

The SCSC monitors state charter schools in the following ways:

- Annual announced monitoring of school operations (onsite and desk monitoring);
- Unannounced monitoring of school facilities for health and safety concerns;
- Website monitoring;
- Formal and unannounced governing board monitoring; and
- Monthly financial review monitoring

This guidance document will explain these various types of monitoring and will describe the purpose, outcomes, and criteria used to evaluate schools for each form of SCSC monitoring.

## Alignment of SCSC Monitoring the SCSC's Comprehensive Performance Framework

Charter school authorizers utilize performance frameworks to establish standards for school performance that are clear, quantifiable, rigorous, and attainable. The SCSC Comprehensive Performance Framework (CPF) includes academic, financial, and organizational performance measures that establish expectations, guide practice, assess progress, and inform decision making over the course of the charter term and at renewal or revocation.

The three areas of performance covered by the frameworks—academic achievement, financial management, and operational compliance— correspond directly with the three components of a high-quality charter school application as well as the three areas on which a charter school's performance should be evaluated. For each of these three areas, the framework asks a fundamental question:

1. Academic Performance: Is the educational program offering students a better educational opportunity than they would otherwise receive at a traditional public school?
2. Financial Performance: Is the school financially viable?
3. Operational Performance: Is the organization effective, compliant, and well run?

All forms of SCSC monitoring primarily focus on the operational performance of state charter schools. Accordingly, the SCSC monitoring activities closely align with the Operational Indicators and Measures of

the CPF<sup>1</sup>. This alignment promotes transparency and provides schools with an understanding of SCSC expectations.

Appendix A provides a comprehensive overview of the alignment of annual announced SCSC monitoring of school operations to the CPF.

## Annual Announced Monitoring of School Operations

As required by O.C.G.A. § 20-2-2083(b)(4) and SCSC Rule 691-2-.03 *State Charter School Monitoring*, the SCSC annually monitors state charter school operations. This form of SCSC monitoring is the most comprehensive and significant type of monitoring the SCSC conducts annually. Like all other forms of SCSC monitoring, the results of annual announced monitoring of school operations is reflected in the operational portion of the SCSC Comprehensive Performance Framework (CPF).

### Onsite vs. Desk Monitoring of School Operations and Finances

The SCSC may conduct this announced monitoring of school operations onsite or via desk monitoring. To qualify for desk monitoring, a school must meet *each* of the following criteria:

- Meeting CPF standards in operations and finances for three consecutive years;
- Strong financial system as evidences through two years of no financial monitoring findings; and
- Two years without any material weaknesses on annual audit.

Schools who meet these criteria will be notified in their annual monitoring notification that will be sent no later than July 1, 2019. Schools who qualify will only be desk monitored at most two years in a row. At the third year, the school will receive a traditional onsite monitoring visit.

### How to Prepare

Adequate preparation is vital for any successful monitoring visit. Deliberate and organized preparation will allow a school to put its best foot forward without placing undue strain and stress on school leaders and staff. Below are a few suggestions on how best to prepare:

- Timely and organized submission of requested documentation: Schools are provided two weeks to upload documents to the SCSC Administration Portal. However, please note that the majority of requested documents should be existing and readily available. Therefore, it should require minimal administrative effort to provide copies of these documents. It is imperative that documentation is submitted in an organized fashion and in accordance with the file name requirements discussed below. Submitting documents in an organized fashion allows SCSC staff to easily locate and evaluate the documentation.
- Utilize your school's website and embrace transparency: SCSC staff always endeavors to utilize publicly-available information. State Charter Schools Commission amended rule 691-2-.03 *State Charter School Monitoring* requires state charter schools to post certain existing information on their website. Any additional information a school elects to post on the website, such as a Student Handbook, will reduce administrative burden on the school during the monitoring cycle. Additionally, state charter schools must make a summary of the annual operating budget proposed and adopted by the governing board available on a publicly available area of the

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<sup>1</sup> You can find additional information on the CPF [here](#).

school's website, as required by O.C.G.A. § 20-2-167.1. The summary of the annual operating budget must include a notice that an individual may request an electronic copy of the school's line item detailed adopted annual operating budget at no cost. The summary of the operating budget must be maintained on its website until the annual operating budget for the next fiscal year is adopted by the state charter school's governing board. A state charter school may easily comply with this requirement by posting a line item detailed proposed and adopted budgets on its website. In short, maintaining a robust website promotes transparency, engages stakeholders and can alleviate much of the administrative burden of the monitoring cycle.

- Annually review policies and procedures for alignment and revise as necessary: Schools are encouraged to annually review and revise, as necessary, all policies and procedures to ensure alignment between the policies/procedures and the implementation of same. Procedures are often tweaked as the school moves through implementation, but many times schools neglect to adjust the written procedures accordingly. This failure may lead to an unnecessary finding during the monitoring visit. Stating that the school provided documentation that is no longer valid in response to an SCSC request is not a persuasive argument against a finding of noncompliance.

### Timeline of Annual Announced Monitoring of School Operations

Announced monitoring of school operations occurs annually for every school in the fall. All schools will receive an annual onsite or desk monitoring of school operations between September 2019 – November 2019. The chart below provides a brief overview of the annual monitoring of school operations process and timeline:

Annual Announced Monitoring of School Operations Process and Timeline	
<b>July 1, 2019</b>	Monitoring webinar and annual announced monitoring of school operations notifications sent to schools. Schools will also be notified if they qualify for desk monitoring.  <i>Monitoring notifications state which documents schools are required to upload into the SCSC portal and their monitoring date and time.</i>
<b>August 12, 2019</b>	Deadline for schools to submit monitoring documentation to SCSC portal
<b>September 2, 2019</b>	Onsite monitoring begins
<b>December 13, 2019</b>	Onsite monitoring letters sent
<b>March 12, 2020</b>	Corrective action plans due from onsite monitoring letters
<b>April 6, 2020</b>	SCSC responds to school corrective action plans sent to schools
<b>June 30, 2020</b>	Additional evidence from school corrective action plans due in order to receive partial CPF points

### FY20 Monitoring Document & Required Documentation

Appendix A contains the document which will be sent to each charter school by August 12, 2019, prior to their announced monitoring visit, which explains the required documentation schools are required to submit by August 12, 2019, to the SCSC portal. SCSC staff attempts to avoid placing undue administrative burdens on schools when conducting monitoring. As a result, the SCSC will collect and

utilize documents from previous monitoring cycles as well as documents available on the school's website. The documentation chart will indicate which documents the SCSC was able to obtain from previous monitoring cycles or a school's website and which documents that the school will need to provide by August 12, 2019.

- **Web**: A notation in the column labeled "Web" indicates that SCSC staff was able to locate that documentation on your school's website and nothing further is required from the school, except as noted below in bolded text. Again, this is where a robust and informative website will be to a school's advantage.
- **FY 19**: A notation in the column labeled "FY19" indicates that the school provided that documentation as part of its FY19 monitoring and nothing further is required from the school, except as noted below in bolded text.
- **Req**: A notation in the column labeled "Req" indicates that documentation is required from the school and must be provided by August 12, 2019.

**Should any document marked as "Web" or "FY19" not be the most up-to-date version, the school must provide the updated version of that document.** Additionally, a school may have provided some documents during its FY19 monitoring. However, the SCSC requires that the school provide updated versions of these documents, and thus, the document is marked as "Req."

### Procedures for Submission of Documentation Prior to Onsite Visit

Each school will receive an email from SCSC staff notifying them of an upcoming visit by July 1, 2019, and schools are required to submit their documentation to the SCSC Administration Portal at [www.scsc-portal.fluidreview.com](http://www.scsc-portal.fluidreview.com) by August 12, 2019. It is imperative that schools meet the August 12, 2019, deadline, or notify SCSC staff of any concerns related to the deadline. Schools that fail to meet the deadline or request a reasonable extension will be in violation of SCSC Rule 691-2-.03 *State Charter School Monitoring*, which may result in point deductions on the CPF.

If the school leader has not received SCSC Administration Portal login information, the school leader must contact Sarah Beck at [sarah.beck@scsc.georgia.gov](mailto:sarah.beck@scsc.georgia.gov) as soon as possible. Each school only receives one account to access the SCSC Portal.

Files should be labeled as follows: FY20\_SchoolName\_ID. The "ID" references the Document ID from Appendix B. For example, a school submitting the governing board's Conflict of Interest policy would name that document: FY20\_HappyHillsCharterSchool\_E.pdf. Again, uploading documents in an organized fashion allows SCSC staff to locate and evaluate the documentation easily.

### What to Expect: Annual Announced Onsite Monitoring of School Operations

During the announced visit, SCSC staff will come to the front office and request to speak with the school leader. Staff will note the general security of the campus as they gain access. Schools can expect the average site visit to last 2-4 hours.

SCSC staff will expect to speak with the school leader as well as other individuals as necessary that are familiar with the day-to-day academic and business operations of the school. The SCSC does not expect board members to be available.

Overall, the site visit is largely an opportunity for SCSC staff to observe practices that align with the policies and procedures submitted as part of your requested documentation. This will be accomplished through dialogue, observations, and a random sampling of various items. Staff may request to observe certain classes or visit certain areas of the school. However, the SCSC intends to conduct site visits in an unobtrusive manner so as not to detract from instruction. Please inform SCSC staff of any sensitive activities, such as testing, which may require avoidance of certain areas or classrooms.

As the site visit winds down, SCSC staff will take the time to summarize the visit, inform the school leader of additional documentation which may be requested and allow school staff to ask any questions they may have.

### What to Expect: Annual Announced Desk Monitoring of School Operations

Schools who meet the desk monitoring criteria mentioned on page 4 will be notified in their annual monitoring notification that will be sent no later than July 1, 2019. Approximately two weeks before your desk monitoring visit, you will receive an email from the SCSC with information about how to join a conference call to conduct operational desk monitoring. The SCSC will request you to send the phone number of your financial team member that the SCSC should call at the date and time of your desk monitoring to monitor your school's financial. Operational and financial desk monitoring will occur separately but simultaneously.

During operational desk monitoring, SCSC staff will expect to speak with the school leader as well as other individuals, as necessary, who are familiar with the day-to-day academic and operations of the school. The SCSC does not expect board members to be available. The SCSC intends to conduct desk monitoring in an unobtrusive manner so as not to detract from instruction.

During financial desk monitoring, SCSC will request the school to immediately pull and send financial documentation to the SCSC for review. The school is expected to have financial documentation on hand and ready to send to SCSC staff, if requested.

As the desk monitoring winds down, SCSC staff will take the time to summarize the visit, inform the school leader of additional documentation which may be requested and allow school staff to ask any questions they may have.

### After the Onsite Visit

#### SCSC Monitoring Letter

Using information obtained from the site visit and document review, SCSC staff will collectively identify issues requiring remediation. The school will be made aware of these issues through a Monitoring Letter, which will be issued for all schools on December 13, 2019. The letter generally highlights three types of issues:

- Findings – issues that are in violation of applicable rule or law and which require corrective action and will result in the loss of points on the Comprehensive Performance Framework (CPF);
- Adverse Practices – issues that do not rise to the level of a finding resulting in the school losing points on the CPF but require corrective action. Failure to correct these practices will result in the loss of CPF points in subsequent school years; and

- Suggestions – issues do not violate applicable rule or law but may require school action to mitigate risk or prevent future noncompliance.

Schools are required to submit a Corrective Action Plan (CAP) in response to any identified findings within 90 days of receiving the Monitoring Letter.

#### Submission of a Corrective Action Plan

A Corrective Action Plan (CAP) is a detailed plan to remedy any findings identified in a Monitoring Letter. A CAP should provide the anticipated solution along with milestones for completion. A school's CAP should be sufficiently detailed so as to allow SCSC staff to have a reasonable understanding of how the school plans to remediate the issue and when remediation will be complete. The contents of the CAP and the methods by which the school chooses to remedy noncompliance is within the discretion of the school's governing board. The SCSC will respect the school's autonomy in devising and implementing its CAP, but it will also hold the governing board accountable for ultimately complying with applicable laws. A school that receives findings through SCSC monitoring may receive partial points on the correlating measure of operational compliance on the CPF if the school:

1. Creates a Corrective Action Plan to remediate the finding;
2. Submits the corrective action plan to the SCSC within the timeframe directed; and
3. Provides evidence of successful remediation and compliance with applicable law during a subsequent SCSC monitoring visit during FY20.

Schools may only receive partial points on measures of operational compliance on the CPF that provide an opportunity for remediation. Schools will not receive partial points on measures that require absolute performance, such as timely data or financial reporting.

#### Preliminary Operational Compliance Summary Reflecting Remediation Taken Corrective Action Plan

In your monitoring letter, the SCSC will include a Preliminary Operational Compliance Results Summary (see Appendix C for an example) based on your on-site monitoring visit that will show how findings from the school's monitoring will impact the school's operational CPF score. Within 14 days of the SCSC receiving the school's Corrective Action Plan, the school will receive a Revised Operational Compliance Results Summary based on the information included in the school's Corrective Action Plan. Please see Appendix D for an example of a Revised Preliminary Operational Compliance Results Summary.

**A school will only receive partial points on a CPF measure if it *submitted evidence that its CAP had been completed and implemented fully*.** For example, if a school received a finding for not having an adequate policy, it must have submitted the updated, governing board-approved policy to the SCSC to ensure the school receives partial points. If the school received a finding related to the school not following its own financial policies, the SCSC would follow up with the school individually to monitor the school's adherence to its CAP. This follow-up monitoring may include the SCSC requested documents via email or coming to the school unannounced to review the school's adherence to its CAP.

Schools do not have to submit evidence of remedying a suggestion made in the monitoring letter.

The SCSC recognizes that it may take longer than the 90 days after the receipt of a monitoring letter for a school to implement each of the items in its CAP. Thus, all additional evidence of CAP completion and



implementation (e.g., approved policies, procedures, proof of training) **must be submitted to Sarah Beck via email at [sarah.beck@scsc.georgia.gov](mailto:sarah.beck@scsc.georgia.gov) by June 30, 2020, to ensure your school will receive partial points on a particular measure for the FY20 CPF.** The SCSC will **not review any documents submitted after June 30, 2020, for partial CPF points.** Importantly, a school may still lose points in sections where it had remedied non-compliance found in SCSC on-site monitoring if the school was in non-compliance with other programs beyond SCSC on-site monitoring (e.g., GaDOE federal program).

## Unannounced Health and Safety Monitoring

The SCSC may conduct unannounced site visits at SCSC schools to monitor the school for health and safety concerns. This unannounced monitoring will not require the presence of a school administrator and will consist of the SCSC observing the facility and other health and safety indicators of the school.

## School Website Monitoring

As of August 1, 2016, all state charter schools are expected to adhere to rule 691-2-.03 *State Charter School Monitoring* that requires each state charter school to have a website with easy access for the public to the following information:

- Governing Board membership;
- Governing Board meeting calendar;
- Meeting agendas for upcoming Governing Board meetings;
- Meeting minutes for past Governing Board meetings (unless the Georgia Open Meetings Act limits their publication, e.g., executive session to discuss personnel matters);
- Procedure for contacting the school's Governing Board;
- Procedure for contacting the school's most senior school administrator;
- Any admissions application utilized by the school;
- Notification of enrollment and admission procedures required by SCSC Rule 691-2-.05, including the date, time, and location of any upcoming enrollment lottery; and
- The charter school's charter contract

Additionally, O.C.G.A. § 20-2-167.1 requires that the summary of the proposed and adopted annual operated budgets of SCSC schools be posted on each school's website.

The SCSC will monitor schools monthly for compliance. The SCSC will notify schools of any initial instance of non-compliance. Subsequent instances of noncompliance may result in the loss of CPF points for the corresponding measure.

The chart below lists items that state charter schools are required to have on their websites, along with guidance (if applicable) about the required information. Note that while the SCSC will monitor schools to ensure that this information specifically is included on their websites, this document is not meant to serve as a comprehensive list of all items that should be included on a school's website.

Item Required	Notes
1. Governing Board membership	<ul style="list-style-type: none"> <li>List <u>all</u> board members' first and last names</li> </ul>
2. Governing Board Meeting Calendar	<ul style="list-style-type: none"> <li>If your school meets at a reoccurring time each month, you may either list reoccurring time or the specific meeting dates.</li> <li>To ensure that the governing board meeting calendar is easily accessible to the public, do not <i>only</i> list board meeting dates in the general school calendar. List out the board meeting dates or the reoccurring meeting time where you have board information on your website.</li> <li>If a special or called meeting (i.e., an unscheduled meeting to deal with a matter that cannot wait until the next meeting) is needed, the school should post information about the meeting on the school's website as soon as reasonably possible and provide oral or written notice of the special meeting to the legal organ of where the school is located at least 24 hours prior to the meeting.</li> </ul>
3. Meeting agendas for upcoming Governing Board meetings	<ul style="list-style-type: none"> <li>Meeting agendas should be posted as far in advance as reasonably possible. At a minimum, agendas must be posted during the two-week period immediately before the meeting.</li> <li>Meeting agendas for special or called meetings (i.e., an unscheduled meeting to deal with a matter that cannot wait until the next meeting) should be posted as soon as reasonably possible.</li> </ul>
4. Meeting minutes for past Governing Board meetings (unless the Georgia Open Meetings Act limits their publication)	<ul style="list-style-type: none"> <li>While there is no requirement regarding <u>when</u> meeting minutes should be posted, meeting minutes should be approved and made available for the public no later than immediately following the next regularly scheduled meeting.</li> <li>Meeting minutes, at a minimum, must include the names of the governing board members present, a description of each motion or other proposal made, the identity of persons making and seconding the motion or other proposal, and a record of all votes. If a vote on a proposal is not unanimous, the names of each governing board member who votes for, against, and/or abstains should be recorded in the minutes.</li> <li>If the governing board has an executive session meeting, the minutes from the executive session must specify each issue discussed but should not be posted publicly and are not subject to disclosure under the Georgia Open Meetings Act.</li> <li>SCSC Rule does not limit the duration for which meeting minutes should be posted on the school's website. Accordingly, a school may make all meeting minutes from previous meetings available on its website to the greatest extent possible. Meeting minutes that are not posted to the school's website must still be made available if a member of the public requests to inspect them. For the purposes of website monitoring, the SCSC expects that the minutes of all meetings occurring during the preceding 12 months will be available on the school's website.</li> </ul>

<b>5. Procedure for contacting the school's Governing Board</b>	<ul style="list-style-type: none"> <li>The SCSC will defer to individual schools to establish policies and procedures for ensuring that individuals can contact the school administration and governing board. These procedures may include an appropriate chain of command for stakeholders to follow prior to contacting the school administration and governing board. Most schools likely already utilize procedures that allow stakeholders to contact appropriate individuals in the chain of command.</li> </ul>
<b>6. Procedure for contacting the school's most senior school administrator</b>	<ul style="list-style-type: none"> <li>The SCSC will defer to individual schools to establish policies and procedures for ensuring that individuals can contact the school administration and governing board. These procedures may include an appropriate chain of command for stakeholders to follow prior to contacting the school administration and governing board. Most schools likely already utilize procedures that allow stakeholders to contact appropriate individuals in the chain of command.</li> </ul>
<b>7. Any admissions application utilized by the school</b>	<ul style="list-style-type: none"> <li>State charter schools should continue to make admissions applications available as long as they enroll students even though they may be oversubscribed. This allows the school to fulfill its open enrollment requirements as students completing applications during periods of enrollment will be added to the school's waitlist.</li> <li>Online admissions applications that require families to create an account and/or login before being able to access the admissions application creates an unreasonable barrier to open enrollment by precluding some families from accessing the admissions application. See page 4 of the SCSC's <a href="#">Charter School Enrollment and Lottery Procedures</a> guidance document for additional information.</li> </ul>
<b>8. Notification of enrollment and admission procedures required by SCSC Rule 691-2-.05, including the date, time, and location of any upcoming enrollment lottery</b>	<ul style="list-style-type: none"> <li>Enrollment and admission procedures should be available in accordance with the school's policies, but, at a minimum, must be made available no later than two weeks prior to an enrollment or admission opportunity pursuant to SCSC Rule 691-2-.05.</li> </ul>
<b>9. The charter school's charter contract</b>	<ul style="list-style-type: none"> <li>The school must post its charter contract and any charter amendments.</li> </ul>
<b>10. The school's current fiscal year budget</b>	<ul style="list-style-type: none"> <li>The school must, at a minimum, post a summary of its current state fiscal year budget as required by O.C.G.A. § 20-2-167.1. You may wish to refer to the SCSC's <a href="#">Legal Obligations of a State Charter School</a> guidance for more information.</li> <li>State law does not distinguish an original annual operating budget from a revised operating budget. Accordingly, if a state charter school identifies the need to revise its budget during the school year, the school should conduct two public meetings to provide an opportunity for public input on the revised budget and post a copy of the school's budget on its website as required by O.C.G.A. § 20-2-167.1.</li> </ul>

For additional information regarding public access to information on state charter school websites, please review the SCSC's guidance on this topic [here](#).

## Governing Board Monitoring

For several years, SCSC staff periodically attended state charter school governing board meetings to intermittently review governance practices and identify methods to better support charter school governance. However, given the relationship between board oversight and student achievement, the SCSC is reaffirming its commitment to supporting effective board governance at the school level. As evidence of this commitment, the SCSC will institute a more systemic approach for observing state charter school governing board meetings during FY20 by using governing board monitors to attend state charter school meetings.

*SCSC governing board monitors are not SCSC staff members* but may attend some or all of your governing board meetings. The SCSC governing board monitors are trained to assess a governing board's compliance with minimum legal requirements (such as open meeting laws) and observe general governance practices. If the SCSC governing board monitor observes an egregious law violation, the school may lose points on the corresponding operational CPF measure. Examples of egregious law violations include but are not limited to: entering into executive session for an impermissible reason; lack of a good faith attempt to provide notice of an open meeting; and dismissing the public while the governing board continues to meet and has not entered into executive session. However, board monitors will not assess minor compliance matters that do not impact the conduct or effectiveness of the board meeting.

## Formal Governing Board Monitoring

In conjunction with governing board monitors who may attend some or all of your school's governing board meetings, beginning in this year, *a SCSC staff member will attend at least one governing board meeting of each state charter school between October 2019 and April 2020. Formal governing board monitoring will only be conducted by a SCSC staff member.* The purpose of a SCSC staff member attending at least one meeting of each state charter school is to better assess the compliance of governing boards with applicable operational CPF standards. After the SCSC attends a governing board meeting, the SCSC will have a conference call with each state charter school governing board to discuss areas of improvement for future governing board meetings. The SCSC will follow up with a formal letter outlining any concerns from the governing board meeting to sufficiently put the governing board on notice of any governance problems that may lead to a future loss of CPF points.

**State charter schools are expected to keep their websites updated with meeting dates and times to ensure that the SCSC staff member will attend your school's governing board meeting at the correct date and time.**

If the SCSC staff member observes an egregious law violation, the school may lose points on the corresponding operational CPF measure. Examples of egregious law violations include but are not limited to: entering into executive session for an impermissible reason; lack of a good faith attempt to provide notice of an open meeting; and dismissing the public while the governing board continues to meet and has not entered into executive session. The SCSC will not assess minor compliance matters that do not impact the conduct or effectiveness of the board meeting.

The chart below provides a brief overview of formal governing board monitoring process and timeline:

<b>Formal Governing Board Monitoring Process and Timeline</b>	
<b>September 2020</b>	Notification is sent to all governing board members that the SCSC will be randomly attending at least one of their governing board meetings from October – April 2020.
<b>October – April 2020</b>	SCSC staff attend at least one governing board meeting of all SCSC schools
<b>Within Two Weeks After SCSC Attending Governing Board Meeting</b>	Governance monitoring calls with governing board members
<b>Within a Month of Monitoring Call with Governing Board Members</b>	Formal governing board monitoring letters sent

## Monthly Financial Review Monitoring

Schools will be required to undergo monthly financial review monitoring if the school meets one of the following categories:

- Scores Far Below Standards on the financial section of the CPF;
- Has a fund deficit;
- Significant financial findings from the SCSC or another regulator agency;
- Placed on High Risk by either GaDOE Federal Programs staff or GaDOE Department of Audits; or
- Inauspicious events that lead the SCSC to question the ability of the school to manage funds appropriately.

Schools that are required to complete monthly financial review monitoring will be contacted directly by the SCSC. Schools will be required to complete and submit an SCSC-provided financial template monthly and provide monthly bank statements.

## Conclusion

The SCSC makes every effort to ensure monitoring is a fair, thorough, and smooth process. Should you have any questions regarding monitoring activities, please contact Sarah Beck, Operational Accountability Manager by email at [sarah.beck@scsc.georgia.gov](mailto:sarah.beck@scsc.georgia.gov).

## Appendices

### Appendix A- State Charter Schools Commission (SCSC) Comprehensive Performance Framework (CPF) Alignment to SCSC Monitoring Overview

The SCSC Comprehensive Performance Framework (CPF) includes academic, financial, and organizational performance measures that establish expectations, guide practice, assess progress, and inform decision making over the course of the charter term and at renewal or revocation. This document provides an example of the alignment between the CPF, Monitoring Documentation, SCSC Monitoring Expectations and a specific Document ID from the FY20 Monitoring Documentation form. This is not an exhaustive list of school obligations or SCSC expectations.

CPF Indicator & Measure	Documentation	SCSC Expectations & On-site Monitoring Actions	Documentation ID
<b>1a – Essential &amp; Innovative Features</b>	<ul style="list-style-type: none"> <li>(SCSC) Charter Contract</li> </ul>	<ul style="list-style-type: none"> <li>School will provide evidence of the implementation of all essential/innovative features in accordance with the charter contract.</li> </ul>	n/a
<b>1b – Mission-Specific Goals</b>	<ul style="list-style-type: none"> <li>(SCSC) Charter Contract</li> </ul>	<ul style="list-style-type: none"> <li>(If applicable) School will demonstrate progress toward meeting any mission-specific goals identified in the charter contract.</li> </ul>	n/a
<b>1c – Education Requirements</b>	<ul style="list-style-type: none"> <li>Copy of your testing calendar and testing policies/procedures</li> <li>Copies of anything distributed to the governing board for the purposes of analyzing student academic data</li> <li>Policies and procedures to support students who are homeless</li> </ul>	<ul style="list-style-type: none"> <li>School will provide evidence that indicate general compliance with the Every Student Succeeds Act (ESSA).</li> <li>School will demonstrate that complies with all aspects of the Migrant Education Program and McKinney-Vento Homeless Assistance Act.</li> <li>School will have identified a testing coordinator and have an appropriate job description which clearly describes the roles and responsibilities of the position which will promote the administration of state assessments in the manner required by law and rule.</li> <li>School will demonstrate that it has a mechanism for keeping the governing board informed of students' academic progress.</li> <li>School will demonstrate that it has a mechanism for ensuring that the curriculum is aligned to state standards.</li> </ul>	<ul style="list-style-type: none"> <li>Doc A</li> <li>Doc P</li> <li>Doc U</li> </ul>
<b>1d – Data Reporting</b>	<ul style="list-style-type: none"> <li>Monitoring Info sheet</li> <li>(SCSC) CPI Report</li> <li>(SCSC) FTE Report</li> </ul>	<ul style="list-style-type: none"> <li>School will demonstrate understanding and compliance with all standard data reporting metrics, such as CPI and FTE.</li> <li>School will comply with all data reporting deadlines.</li> <li>School will provide evidence that at least one staff member attended the</li> </ul>	

		FY20 GaDOE Data Collections conference.	
<b>2a – Financial Reporting</b>	<ul style="list-style-type: none"> <li>• (SCSC) DE 046</li> <li>• Random sample - T&amp;E Reporting</li> </ul>	<ul style="list-style-type: none"> <li>• School will demonstrate that it complied with DE 046 reporting requirements and will provide its audit to the SCSC in accordance with its contractual deadline.</li> <li>• SCSC staff will request a random sample of Time &amp; Effort reporting. The random sample should demonstrate compliance with federal regulations regarding employees whose salary is paid with federal funding.</li> </ul>	
<b>2b – Adherence to GAAP Standards</b>	<ul style="list-style-type: none"> <li>• Random sample – Copy of cleared check over school-established threshold requiring additional/board signature</li> <li>• Random sample – Copy of a Purchase Order</li> <li>• Financial policies and standard operating procedures adopted by the governing board</li> <li>• School financial/operational handbook or procedure manual used by staff in day-to-day operations</li> <li>• Policies and procedures relating to inventory management if not included in the school/financial operational handbook</li> <li>• A monthly, quarterly, semi-annual financial report that the board reviewed this fiscal year, or the same documents for past years if not available for the current year</li> <li>• Copy of the current year budget</li> <li>• List of all contracted vendors</li> <li>• Documentation to show that the budget was approved in accordance with O.C.G.A. § 20-2-167.1</li> </ul>	<ul style="list-style-type: none"> <li>• SCSC staff will request a random cleared check over the established threshold. The check should demonstrate compliance with policy.</li> <li>• SCSC staff will request a random PO. The PO should demonstrate compliance with policy.</li> <li>• School staff will demonstrate knowledge and understanding of financial policies and procedures.</li> <li>• The school will provide evidence that the board is periodically reviewing school finances.</li> <li>• The school will evidence the use of an inventory control system consistent with federal grant award requirements.</li> <li>• The school will ensure that all deposits are appropriately collateralized.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc C</li> <li>• Doc D</li> <li>• Doc E</li> <li>• Doc F</li> <li>• Doc G</li> </ul>
<b>3a – General Governance</b>	<ul style="list-style-type: none"> <li>• Conflicts of Interest Policy</li> </ul>	<ul style="list-style-type: none"> <li>• The school will provide evidence that governing board members adhere to the Conflicts of Interest policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc H</li> </ul>

<b>3b – Open Governance</b>	<ul style="list-style-type: none"> <li>• (Web) Minutes/Agendas on Website</li> <li>• (Web) List of governing board members</li> <li>• Meeting minutes from a committee meeting (if applicable)</li> <li>• Public comment policies and procedures for governing board meetings (if applicable)</li> <li>• Parent complaint policies and procedures (if applicable)</li> <li>• Affidavit from governing board executive session (if applicable)</li> <li>• <u>All</u> open records requests from the past year and copy of the school's responses (if applicable)</li> </ul>	<ul style="list-style-type: none"> <li>• The school shall demonstrate compliance with SCSC Rule 691-2-.03 <i>State Charter School Monitoring</i> regarding documents required on school website.</li> <li>• Minutes and agendas shall reflect compliance with applicable law, adherence to conflicts of interest policies and governing board oversight of school academics, finances and operations.</li> <li>• The school evidences compliance with the Georgia Open Records Act.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc I (if applicable)</li> <li>• Doc J (if applicable)</li> <li>• Doc K (if applicable)</li> <li>• Doc L</li> <li>• Doc M (if applicable)</li> </ul>
<b>3c – Governance Training</b>	<ul style="list-style-type: none"> <li>• Policy for board members that do not meet governance training requirement (if applicable)</li> </ul>	n/a	<ul style="list-style-type: none"> <li>• Doc N (if applicable)</li> </ul>
<b>3d – Holding Management Accountable</b>	<ul style="list-style-type: none"> <li>• (SCSC) LKES certification</li> </ul>	<ul style="list-style-type: none"> <li>• The school shall demonstrate compliance with charter contract requirements regarding LKES credentialing.</li> <li>• The school will demonstrate governing board oversight over managers and contractors.</li> </ul>	n/a
<b>4a – Rights of All Students</b>	<ul style="list-style-type: none"> <li>• Enrollment/Lottery Policy</li> <li>• (Web) Admissions Application</li> <li>• PPRA Policy/Notice</li> <li>• Student Discipline Policy and Procedures</li> <li>• Student Handbook</li> <li>• Random sample – student discipline record</li> <li>• GaDOE Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• The school shall provide evidence of compliance with open enrollment.</li> <li>• The school shall provide evidence that students and parents are provided appropriate notice of applicable rule and law.</li> <li>• The school shall provide evidence that students are afforded proper due process.</li> <li>• The school conducts student searches in accordance with applicable law.</li> <li>• The school maintains grievance procedures that adhere to federal law.</li> <li>• The school maintains policies that do not infringe upon student rights.</li> <li>• The school does not require students to purchase materials necessary to participate in the school's educational program.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc Q</li> <li>• Doc R</li> <li>• Doc S</li> <li>• Doc T</li> </ul>



<b>4b – Rights of Students with Disabilities</b>	<ul style="list-style-type: none"> <li>• SWD policies and procedures</li> <li>• GaDOE Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• The school shall demonstrate that students with disabilities are served in accordance with applicable rule and law.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc V</li> </ul>
<b>4c – Rights of Students who are ELs</b>	<ul style="list-style-type: none"> <li>• EL policies</li> <li>• GaDOE Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• The school shall demonstrate that students who are English learners are served in accordance with applicable rule and law.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc W</li> </ul>
<b>4d – Employee Qualifications</b>	<ul style="list-style-type: none"> <li>• Professional qualifications policy for teacher certification</li> </ul>	<ul style="list-style-type: none"> <li>• The school ensures that all paraprofessionals meet the Highly Qualified requirements of ESSA.</li> <li>• The school ensures that it adheres to the professional qualifications it established as part of its CLIP.</li> <li>• The school's CFO meets contractual obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc O (if applicable)</li> <li>• Doc Y</li> </ul>
<b>4e – Employee Rights</b>	<ul style="list-style-type: none"> <li>• Employee Handbook</li> <li>• Organizational chart</li> </ul>	<ul style="list-style-type: none"> <li>• The school shall demonstrate that employees are provided proper notice and afforded due rights under applicable rule and law.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc X</li> <li>• Doc Y</li> <li>• Doc Z</li> </ul>
<b>4f – Criminal Records Checks</b>	<ul style="list-style-type: none"> <li>• Evidence that school employees hold PSC-issued clearance certificates</li> <li>• Parent volunteer policies and procedures</li> </ul>	<ul style="list-style-type: none"> <li>• The school shall provide evidence that all employees hold PSC-issued clearance certificates.</li> </ul>	
<b>5a – Facilities Requirements</b>	<ul style="list-style-type: none"> <li>• (SCSC) Copy of current facility lease</li> <li>• Evidence school has reported a recent fire drill to the Office of the Insurance and Safety Fire Commissioner</li> </ul>	<ul style="list-style-type: none"> <li>• The school maintains all required fire inspection records and holds a valid certificate of occupancy.</li> <li>• The school received appropriate approvals from the SCSC and Facilities Service Unit of GaDOE prior to adding or changing a facility.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc AA</li> </ul>
<b>5b – Student Retention</b>	<ul style="list-style-type: none"> <li>• (SCSC) Churn Rate</li> </ul>	<ul style="list-style-type: none"> <li>• The school should demonstrate effective student retention efforts.</li> </ul>	
<b>5c – Health and Safety</b>	<ul style="list-style-type: none"> <li>• Student Health Policies</li> <li>• Policy for Reporting Child Abuse/Neglect</li> <li>• Suicide Prevention Policy</li> <li>• Information about how the school is providing mandatory sexual abuse and assault awareness education for students in grades K-9</li> </ul>	<ul style="list-style-type: none"> <li>• The school facility should appear to be clean and in good repair.</li> <li>• There should be no visible safety concerns.</li> <li>• The school will demonstrate that it has taken steps to provide a campus that is secure from potential intrusion.</li> <li>• The school shall demonstrate that it safeguards the health and safety of students.</li> </ul>	<ul style="list-style-type: none"> <li>• Doc AA</li> <li>• Doc BB</li> <li>• Doc CC</li> <li>• Doc DD</li> <li>• Doc EE</li> <li>• Doc FF</li> </ul>
<b>5d – Support Services</b>		<ul style="list-style-type: none"> <li>• The school maintains a nursing policy to address the medical needs of its students.</li> <li>• If participating in the National School Lunch Program, the school adheres to all requirements of the program,</li> </ul>	n/a

		<p>including maintaining a wellness policy and procedures for meal reimbursement.</p> <ul style="list-style-type: none"> <li>If providing transportation, the school follows all driver training and licensing requirements and ensures all vehicles meet school bus specifications.</li> </ul>	
<b>5e – Information, Data and Communication</b>	<ul style="list-style-type: none"> <li>Records retention schedule (if applicable)</li> </ul>	<ul style="list-style-type: none"> <li>The school shall demonstrate that it takes appropriate steps to safeguard student and personnel files.</li> <li>The school demonstrates communication with stakeholders when developing and implementing federal programs.</li> </ul>	<ul style="list-style-type: none"> <li>Doc GG</li> </ul>
<b>6a – Additional Obligations</b>	n/a	<p>Examples of additional obligations not measured by other CPF indicators:</p> <ul style="list-style-type: none"> <li>Utilizing E-Verify to determine employee eligibility.</li> <li>Adhering to contractual performance-based enrollment limitations.</li> <li>The school has not entered into or amended a contract with an ESP without SCSC prior approval.</li> <li>School should hold proper license or exemption from the Georgia Department of Early Care and Learning if it is providing before or after school care for pay at the school.</li> <li>The school is not following its own financial policies.</li> <li>The school is not following policies in GaDOE's Local Units of Administration (LUA) Manual.</li> </ul>	<ul style="list-style-type: none"> <li>Doc C</li> <li>Doc D</li> <li>Doc E</li> </ul>
<b>6b – Continuing Obligations</b>	<ul style="list-style-type: none"> <li>(SCSC) FY19 Monitoring Letter</li> <li>(SCSC) FY18 Operational CPF Results</li> <li>(SCSC) FY19 CAP in response to Monitoring Letter</li> </ul>	<ul style="list-style-type: none"> <li>The school shall demonstrate ongoing compliance related to previous monitoring-based corrections.</li> </ul>	n/a

Key	
(SCSC)	A document which the SCSC has or can access
(Web)	A document which should be available via the school's website

## Appendix B – Required Documentation

SCSC staff wishes to avoid placing undue administrative burdens on schools when conducting monitoring. Please use the chart below to determine which documents you must upload to the SCSC Administration Portal by **August 12, 2019**. A notation in the column labeled “Web” indicates that SCSC staff was able to locate that documentation on your school’s website. A notation in the column labeled “FY19” indicates that the school provided that documentation as part of its FY19 monitoring. A notation in the column labeled “Req” indicates that documentation is required from the school. **Should any document marked as “Web” or “FY19” not be the most up-to-date version, the school should upload the updated version of that document.**

*When uploading documents, please label as follows: FY20\_SchoolName\_ID (Example: FY20\_HappyHillsCharterSchool\_A.pdf).*

ID	Description of Document	Web	FY19	Req
A	Copy of testing calendar and testing policies and procedures			
B	Copies of any documents distributed to the governing board for the purposes of analyzing the school’s performance on CPF indicators in operations, finances, and academics  <i>Financial information submitted should include monthly financial reports given to the governing board or finance committee that shows: 1) school budgets vs. actuals; 2) bank reconciliations; and 3) CPF score projections</i>			
C	Financial policies and standard operating procedures adopted by the governing board; <b>including the school’s procurement policies and procedures</b>			
D	School financial/operational handbook or procedure manual used by staff in day-to-day operations			
E	Policies and procedures relating to inventory management if not included in the school’s operational/operational handbook			
F	Copy of current year budget			
G	Documentation to show the budget was approved in accordance with O.C.G.A. § 20-2-167.1, including meeting minutes from the two public meetings prior to budget approval and a copy of the advertisement of the budget meetings in the school’s official legal organ newspaper			
H	Governing board conflict of interest policy			
I	If applicable: meeting minutes from a committee meeting			
J	If applicable: public comment policies and procedures for governing board meetings			
K	If applicable: parent complaint policies and procedures			

L	If applicable: affidavit from governing board conducting executive session			
M	If applicable: an open records request made under O.C.G.A. § 50-18-70 et seq. from the past year and copy of the school's responses (this may include requests for a student's or employee's record)			
N	If applicable: policy for board members that do not meet governance training requirement			
O	If applicable: hiring policies regarding nepotism			
P	Student grade level promotion and retention policy			
Q	Policies related to student enrollment and lotteries  <b><i>Please also include a copy of an enrollment application (i.e., the application families fill out to be included in a lottery) and a registration form (i.e., the form families fill out to accept a slot in your school)</i></b>			
R	Student/parent handbook and other school-wide notices provided to parents regarding school policies			
S	Student bullying prevention policy			
T	Procedures for conducting disciplinary hearings and appeals			
U	Policies and procedures for ensuring the enrollment, attendance, and success of students who lack a fixed, regular, and adequate nighttime residence			
V	Policies and procedures for serving students with disabilities			
W	Policies and procedures relating to the identification and service of students who are English learners			
X	Professional qualifications policy for teacher certification			
Y	Organizational chart			
Z	Employee handbook			
AA	Volunteer policies and procedures			
BB	Evidence school has reported a recent fire drill to the Office of Insurance and Safety Fire Commissioner			
CC	Policies and procedures for reporting child abuse and neglect			
DD	Policies regarding student health screening (including the school's nursing policy, immunization policy, and infectious disease policy)			
EE	Suicide prevention policy			
FF	Information about how the school is providing mandatory sexual abuse and assault awareness education for students in grades K – 9			
GG	If applicable: records retention schedule			

## Appendix C – Example of FY20 Initial Operational Compliance Results Summary

To assist schools in assessing the impact of annual SCSC on-site monitoring on the school's operational performance as measured by the CPF, the SCSC will include the following appendix in the school's monitoring letter. This appendix illustrates the results of the school's on-site monitoring and the corresponding CPF measures affected by the school's compliance demonstrated through this monitoring. Please note that this appendix included in the school's monitoring letter will not be the final operational CPF scores for FY20 as the school's operational performance will continue to be evaluated throughout the school year through a variety of means.

### FY20 Initial Operational Compliance Results Summary for Happy Hills Charter School (HHCS):

CPF Indicator	CPF Measure	Result	Explanation
<b>1. Educational Program Compliance</b>	1(a) – Essential or Innovative Features	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	1(b) – Mission-Specific Goals (bonus)	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	1(c) – Education Requirements	Pending	<b>Suggestion:</b> Improving assessment security in the school's testing policies.
<b>2. Financial Oversight</b>	2(a) – Financial Reporting	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
<b>3. Governance</b>	3(a) – General Governance Requirements	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	3(b) – Open Governance	Pending	<b>Suggestion:</b> Improving compliance with the Georgia Open Meetings Act.
	3(c) – Governance Training	Pending	<b>Suggestion:</b> Create a policy regarding governing board members who do not participate in legally required governance training.
	3(d) – Holding Management Accountable	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
<b>4. Students and Employees</b>	4(a) – Rights of All Students	Pending	<b>Suggestion:</b> Clarifying that HHCS utilizes parent volunteer requirements in a manner that is consistent with due process rights afforded to students under federal law.  <b>Suggestion:</b> Conduct training to improve understanding of student religious rights at school.
	4(b) – Rights of Students with Disabilities	<b>Did Not Meet</b>	<b>Finding:</b> HHCS's policies and procedures for serving students with disabilities is not consistent with federal law.
	4(c) – Rights of Students who are English Learners (ELs)	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.

	4(d) – Employee Qualifications	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	4(e) – Employee Rights	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	4(f) – Criminal Record Checks	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
<b>5. School Environment</b>	5(a) – Facility	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	5(c) – Health and Safety	<b>Did Not Meet</b>	<b>Finding:</b> HHCS’s policies and procedures for reporting allegations of child abuse and neglect are not consistent with the requirements of state law.
	5(d) – Support Services	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	5(e) – Information, Data, and Communications	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
<b>6. Additional Obligations</b>	6(a) – Additional Obligations	<b>Did Not Meet</b>	<p><b>Finding:</b> HHCS’s inventory management system is not consistent with federal regulatory requirements.</p> <p><b>Finding:</b> HHCS’s Financial Affairs Policy Manual is not consistent with the requirements of the Georgia Department of Education’s Financial Management for Georgia Local Units of Administration Manual (LUA Manual).</p> <p><b>Suggestion:</b> Improve internal controls for check signing.</p> <p><b>Suggestion:</b> Include procedures in the school’s Financial Affairs Policy Manual that embeds the requirements of O.C.G.A. § 20-2-167.1.</p>

## Appendix D – Example of FY20 Revised Preliminary Operational Compliance Results Summary

By April 6, 2020, the school will receive a Revised Operational Compliance Results Summary based on the information included in the school's Corrective Action Plan. **A school will only receive partial points on a CPF measure if it submitted evidence that its CAP has been completed and implemented fully.** The SCSC recognizes that it may take longer than the 90 days after the receipt of a monitoring letter for a school to implement all of the items in its CAP. Thus, all additional evidence of CAP completion and implementation (e.g., approved policies, procedures, proof of training) **must be submitted to Sarah Beck via email at [sarah.beck@scsc.georgia.gov](mailto:sarah.beck@scsc.georgia.gov) by June 30, 2020 to ensure your school will receive partial points on a particular measure for the FY20 CPF.** The SCSC will **not review any documents submitted after June 30, 2020 for partial CPF points.** Importantly, a school may still lose points in sections where it remedied non-compliance found in SCSC on-site monitoring if the school was in non-compliance with other programs beyond SCSC on-site monitoring (e.g., GaDOE federal program monitoring).

### FY2020 Revised Preliminary Operational Compliance Results Summary for Happy Hills Charter School (HHCS):

CPF Indicator	CPF Measure	Result	Explanation
<b>1. Educational Program Compliance</b>	1(a) – Essential or Innovative Features	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	1(b) – Mission-Specific Goals (bonus)	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	1(c) – Education Requirements	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
<b>2. Financial Oversight</b>	2(a) – Financial Reporting	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
<b>3. Governance</b>	3(a) - General Governance Requirements	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	3(b) – Open Governance	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	3(c) – Governance Training	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	3(d) – Holding Management Accountable	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.

<b>4. Students and Employees</b>	4(a) – Rights of All Students	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	4(b) – Rights of Students with Disabilities	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	4(c) – Rights of Students who are English Learners (ELs)	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	4(d) – Employee Qualifications	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	4(e) – Employee Rights	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	4(f) – Criminal Record Checks	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
<b>5. School Environment</b>	5(a) – Facility	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	5(c) – Health and Safety	<b>Did Not Meet</b>	<p><b>Finding:</b> HHCS’s policy of reporting allegations of child abuse and neglect is not consistent with the requirements of state law.</p> <p>→<b>INCOMPLETE CORRECTIVE ACTION PLAN:</b> HHCS stated in its CAP that it would update its child abuse and neglect reporting policies to meet the requirements in state law. However, HHCS has not submitted to the SCSC its revised policies. HHCS has <b>not</b> adequately remedied this finding.</p> <p><b>Finding:</b> HHCS does not have an adequate suicide prevention policy and is not providing suicide prevention training as required by Georgia law.</p> <p>→<b>COMPLETED CORRECTIVE ACTION PLAN:</b> HHCS submitted evidence in its CAP that its governing board approved a suicide prevention policy and that required staff received suicide prevention training. HHCS has adequately remedied this finding.</p>
	5(d) – Support Services	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.
	5(e) – Information, Data, and Communications	Pending	This SCSC on-site monitoring did not yield evidence to indicate that the HHCS is not meeting expectations for this measure.



6. Additional Obligations	6(a) – Additional Obligations	Did Not Meet	<p><b>Finding:</b> HHCS’s operation of a before and after school program without a licensing exemption from Bright from the Start: Georgia Department of Early Care and Learning is a violation of state law.</p> <p>→ <b>COMPLETED CORRECTIVE ACTION PLAN:</b> HHCS submitted evidence in its CAP that it has received a licensing exemption from Bright from the Start: Georgia Department of Early Care and Learning for its operation of a before and after school program. HHCS has adequately remedied this finding.</p> <p><b>Finding:</b> Evidence provided by HHCS during the on-site visit by SCSC staff revealed that the school was not following its financial policies.</p> <p>→ <b>SCSC WILL CONTINUE TO MONITOR HHCS’S ADHERENCE TO IT’S CORRECTIVE ACTION PLAN:</b> HHCS submitted information in its CAP about revised procedures to ensure that it is adhering to its own financial policies. The SCSC will continue to monitor the school’s compliance with its CAP by requesting additional documentation or conducting an unannounced follow-up monitoring visit to the school.</p>
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