

Monitoring Handbook



State Charter Schools Commission of
Georgia

Version: FY19

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Introduction: The Purpose of 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 helps promote high-quality charter schools by identifying concerns and incentivizing schools to timely correct noncompliance.

The results of SCSC monitoring activities will be reflected on the operational portion of the SCSC Comprehensive Performance Framework (CPF). If your school receives a finding as a result of SCSC monitoring, the SCSC will deduct points from the correlating measure of operational compliance on the CPF. Additionally, if your school received findings as a result of SCSC monitoring during previous school years, the school will be expected to demonstrate that it has completed its corrective action and remedied any previously-identified noncompliance by the time SCSC staff conducts its onsite visit this school year.

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 creates and submits a corrective action plan to remediate the finding and demonstrates that school implemented remediating measures and is currently in compliance with applicable law during a subsequent SCSC monitoring visit. The requirements for a school to receive partial points on the CPF for remediating noncompliance is discussed in more detail in the Corrective Action Plans portion of this guidance.

Please note that the purpose of SCSC monitoring is not to “catch” schools for noncompliance with applicable law. Rather, SCSC monitoring is one method by which the SCSC fulfills its statutory duty of holding state charter schools accountable, and that accountability is aimed to ensure that state charter schools are constantly improving to provide a high-quality education that provides students a better educational opportunity than traditional school districts. The SCSC is committed to supporting state charter schools in meeting their operational expectations in a manner that respects school autonomy. SCSC monitoring allows the SCSC to identify additional trainings and supports that may be necessary to resolve persistent problems in state charters schools.

Alignment to the SCSC 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. In each of the 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?

SCSC monitoring primarily focuses on the organizational performance of state charter schools. Accordingly, the SCSC monitoring activities closely align with the Organizational Indicators and Measures of the CPF¹. This alignment promotes transparency and provides schools with an understanding of SCSC expectations.

Appendix A provides a comprehensive overview of the alignment between the CPF. Appendix B explains the required documentation schools are required to submit to the SCSC Portal by August 22, 2018.

How the SCSC Monitors Schools

The SCSC monitors schools using a variety of methods, including:

- Announced on-site monitoring: Beginning in FY19, the SCSC will schedule its annual on-site monitoring visits with schools in advance. During the visit, SCSC staff will be on-site for 2-4 hours and will need to speak with individuals knowledgeable about the school's operations and finances, which may include the school leader and/or financial leader or his/her designee. Following the visit, SCSC staff may request additional documents or records to facilitate comprehensive monitoring.
- Unannounced site visits: The SCSC may visit the school unannounced to conduct a health, safety, and facility check of the school. School leadership does not need to be present during unannounced SCSC site visits. During the unannounced site visit, SCSC staff will monitor the school's security and safety mechanisms to ensure the safety of students. Following the visit, SCSC staff may request additional documents or records to facilitate its visit. Additionally, the SCSC may require that the school perform corrective action if the SCSC finds the school's environment is not ensuring a healthy and safe setting for its students.
- Unannounced attendance at governing board meetings: SCSC staff may observe a board meeting to ensure that the meeting is conducted in accordance with Georgia's Open Meetings Act and other charter school governance best practices.
- Website reviews: SCSC staff will review each school's website to ensure that the information it provides to stakeholders regarding governance, the admissions process, special education, and other areas is accurate and consistent with applicable law and regulations; specifically, SCSC [Rule 691-2-.03 State Charter School Monitoring](#) and [SBOE Rule 160-4-9-.06\(2\)\(e\) Charter School Public Records](#). The rules require state charter schools to post certain existing information on their website to promote transparency. [A guidance document to assist schools with complying is available here](#). The most consistent complaint the SCSC receives regarding state charter schools is the lack of communication and transparency of the school with its stakeholders. As a school's website is often its first and most frequent interaction with stakeholders, the SCSC is committed to assisting schools in ensuring the information they provide on their website is complete and accurate.

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

- Documentation reviews: SCSC staff requests various forms of documentation as part of its monitoring activities. Staff reviews this information to ensure that it is accurate and consistent with applicable law and regulations. For example, SCSC staff will review a school's admission application to ensure it complies with open enrollment requirements. It is critical that schools provide the most up-to-date documents requested by SCSC staff as all documents the school provides will be reviewed for compliance with applicable law. 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.
- Case-by-case action in response to concerns expressed to the SCSC: The SCSC takes stakeholder concerns very seriously. SCSC staff carefully reviews all complaints submitted and, on a case-by-case basis, may reach out to schools for additional information. In the event that the SCSC determines the school has violated applicable law and/or regulations, SCSC staff will inform the school of the violation and require correction.
- Monitoring of other agencies: State charter schools conduct programs that are monitored by state or federal agencies other than the SCSC. The programs include, but are not limited to, federal Title Programs, activities under the Individuals with Disabilities Education Act (IDEA), and school nutrition programs. The SCSC receives notification when a state charter school is found out of compliance when monitored by other agencies. The SCSC will ensure the school's CPF results reflect any noncompliance, and the SCSC will monitor the school's implementation of required corrective action.
- Independent Audit: SCSC staff reviews each school's annual independent audit conducted pursuant to O.C.G.A. § 20-2-2065(b)(7). To the extent a school's audit notes a material weakness, noncompliance with applicable law or Generally Acceptable Accounting Principles, or any other adverse statement, the school's CPF will reflect the noncompliance and SCSC staff will monitor the school's correction of the issue.

Annual On-Site Monitoring

Timeline of SCSC On-Site Monitoring

SCSC monitoring occurs annually for every school throughout the year. All schools will receive an announced site visit, generally September 2018 – November 2018. The chart below provides a brief overview of the on-site monitoring process and timeline.

On-Site Monitoring Process and Timeline	
Pre-Monitoring Webinar	August 8, 2018
Collection of Documentation	Due to SCSC Portal by August 22, 2018
Monitoring Visits	September - November
Monitoring Letter Sent to School	November 2018 – January 2019
Corrective Action Plans Submitted (if applicable)	Within 90 days of the Monitoring Review letter
Revised Preliminary Operational Compliance Summary Submitted to School Reflecting Remediation Taken Corrective Action Plan (if applicable)	Within 14 days of Corrective Action Plan submission to the SCSC
Revised Corrective Action Plan Evidence Submitted Showing Evidence of Remediation to Receive Partial CPF Points (if applicable)	By June 30, 2019

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's 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 on a publicly available area of the 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.

FY 19 Monitoring Document & Required Documentation

Appendix A contains the document which will be sent to each charter school by August 8, 2018 prior to their announced monitoring visit that explains the required documentation schools are required to submit by August 22, 2018 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 22, 2018.

- 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 18: A notation in the column labeled "FY18" indicates that the school provided that documentation as part of its FY18 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 22, 2018.

Should any document marked as "Web" or "FY18" not be the most up-to-date version, the school should provide the updated version of that document. Additionally, a school may have provided some documents during your FY18 monitoring, however, the SCSC requires that you provided updated versions of these documents and thus the document is marked as "Req."

Procedures for Submission of Documentation Prior to On-Site Visit

Each school will receive an email from SCSC staff notifying them of an upcoming visit by August 8, 2018 and schools are required to submit upload their documentation to the SCSC Administration Portal at www.scsc-portal.fluidreview.com by August 22, 2018. It is imperative that schools meet the August 22, 2018 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 as soon as possible. Each school only receives one account to access the SCSC Portal.

Files should be labeled as follows: FY19_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: FY19_HappyHillsCharterSchool_E.pdf. Again, uploading documents in an organized fashion allows SCSC staff to easily locate and evaluate the documentation.

On-Site Visit: What to Expect

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.

After the On-Site 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 from November 2018 to January 2019. The letter generally highlights two types of issues:

- Findings – issues that are in violation of applicable rule or law and which require immediate remediation; 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.

On-Site Monitoring Corrective Action Plans

A Corrective Action Plans (CAP) is a 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 law. 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. Evidences successful remediation and compliance with applicable law during a subsequent SCSC monitoring visit during FY19.

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 and 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 has 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 will be following 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 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 by June 30 2019 to ensure your school will receive partial points on a particular measure for the FY19 CPF.** The SCSC will **not review any documents submitted after June 30, 2019 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).

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.

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 FY 18 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
1a – Essential & Innovative Features	<ul style="list-style-type: none"> (SCSC) Charter Contract 	<ul style="list-style-type: none"> School will provide evidence of the implementation of all essential/innovative features in accordance with the charter contract. 	n/a
1b – Mission-Specific Goals	<ul style="list-style-type: none"> (SCSC) Charter Contract 	<ul style="list-style-type: none"> (If applicable) School will demonstrate progress toward meeting any mission-specific goals identified in the charter contract. 	n/a
1c – Education Requirements	<ul style="list-style-type: none"> Copy of your testing calendar and testing policies/procedures Copies of anything distributed to the governing board for the purposes of analyzing student academic data Policies and procedures to support students who are homeless 	<ul style="list-style-type: none"> School will provide evidence that indicate general compliance with the Every Student Succeeds Act (ESSA). School will demonstrate that complies with all aspects of the Migrant Education Program and McKinney-Vento Homeless Assistance Act. 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. School will demonstrate that it has a mechanism for keeping the governing board informed of students’ academic progress. School will demonstrate that it has a mechanism for ensuring that the curriculum is aligned to state standards. 	<ul style="list-style-type: none"> Doc A Doc B Doc S
1d – Data Reporting	<ul style="list-style-type: none"> Monitoring Info sheet (SCSC) CPI Report (SCSC) FTE Report 	<ul style="list-style-type: none"> School will demonstrate understanding and compliance with all standard data reporting metrics, such as CPI and FTE. School will comply with all data reporting deadlines. School will provide evidence that at least one staff member attended the FY 18 GaDOE Data Collections conference. 	

<p>2a – Financial Reporting</p>	<ul style="list-style-type: none"> • (SCSC) DE 046 • Random sample - T&E Reporting 	<ul style="list-style-type: none"> • 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. • SCSC staff will request a random sample of Time & Effort reporting. The random sample should demonstrate compliance with federal regulations regarding employees whose salary is paid with federal funding. 	
<p>2b – Adherence to GAAP Standards</p>	<ul style="list-style-type: none"> • Random sample – Copy of cleared check over school-established threshold requiring additional/board signature • Random sample – Copy of a Purchase Order • Financial policies and standard operating procedures adopted by the governing board • School financial/operational handbook or procedure manual used by staff in day-to-day operations • Policies and procedures relating to inventory management if not included in the school/financial operational handbook • 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 • Copy of the current year budget • List of all contracted vendors • Documentation to show that the budget was approved in accordance with O.C.G.A. § 20-2-167.1 	<ul style="list-style-type: none"> • SCSC staff will request a random cleared check over the established threshold. The check should demonstrate compliance with policy. • SCSC staff will request a random PO. The PO should demonstrate compliance with policy. • School staff will demonstrate knowledge and understanding of financial policies and procedures. • The school will provide evidence that the board is periodically reviewing school finances. • The school will evidence the use of an inventory control system consistent with federal grant award requirements. • The school will ensure that all deposits are appropriately collateralized. 	<ul style="list-style-type: none"> • Doc C • Doc D • Doc E • Doc F • Doc G
<p>3a – General Governance</p>	<ul style="list-style-type: none"> • Conflicts of Interest Policy 	<ul style="list-style-type: none"> • The school will provide evidence that governing board members adhere to the Conflicts of Interest policy. 	<ul style="list-style-type: none"> • Doc H
<p>3b – Open Governance</p>	<ul style="list-style-type: none"> • (Web) Minutes/Agendas on Website 	<ul style="list-style-type: none"> • The school shall demonstrate compliance with SCSC Rule 691-2-.03 	<ul style="list-style-type: none"> • Doc I (if applicable)

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

4b – Rights of Students with Disabilities	<ul style="list-style-type: none"> • SWD policies and procedures • SEA Monitoring 	<ul style="list-style-type: none"> • The school shall demonstrate that students with disabilities are served in accordance with applicable rule and law. 	<ul style="list-style-type: none"> • Doc T
4c – Rights of Students who are ELs	<ul style="list-style-type: none"> • EL policies • SEA Monitoring 	<ul style="list-style-type: none"> • The school shall demonstrate that students who are English learners are served in accordance with applicable rule and law. 	<ul style="list-style-type: none"> • Doc U
4d – Employee Qualifications	<ul style="list-style-type: none"> • Professional qualifications policy for teacher certification 	<ul style="list-style-type: none"> • The school ensures that all paraprofessionals meet the Highly Qualified requirements of ESSA. • The school ensures that it adheres to the professional qualifications it established as part of its CLIP. • The school’s CFO meets contractual obligations. 	<ul style="list-style-type: none"> • Doc V
4e – Employee Rights	<ul style="list-style-type: none"> • Employee Handbook • Organizational chart 	<ul style="list-style-type: none"> • The school shall demonstrate that employees are provided proper notice and afforded due rights under applicable rule and law. 	<ul style="list-style-type: none"> • Doc X • Doc Y
4f – Criminal Records Checks	<ul style="list-style-type: none"> • Evidence that school employees hold PSC-issued clearance certificates • Parent volunteer policies and procedures 	<ul style="list-style-type: none"> • The school shall provide evidence that all employees hold PSC-issued clearance certificates. 	<ul style="list-style-type: none"> • Doc Z
5a – Facilities Requirements	<ul style="list-style-type: none"> • (SCSC) Copy of current facility lease • Evidence school has reported a recent fire drill to the Office of the Insurance and Safety Fire Commissioner 	<ul style="list-style-type: none"> • The school maintains all required fire inspection records and holds a valid certificate of occupancy. • The school received appropriate approvals from the SCSC and Facilities Service Unit of GaDOE prior to adding or changing a facility. 	<ul style="list-style-type: none"> • Doc AA
5b – Student Retention	<ul style="list-style-type: none"> • (SCSC) Churn Rate 	<ul style="list-style-type: none"> • The school should demonstrate effective student retention efforts. 	
5c – Health and Safety	<ul style="list-style-type: none"> • Student Health Policies • Policy for Reporting Child Abuse/Neglect • Suicide Prevention Policy • Information about how the school is providing mandatory sexual abuse and assault awareness education for students in grades K-9 	<ul style="list-style-type: none"> • The school facility should appear to be clean and in good repair. • There should be no visible safety concerns. • The school will demonstrate that it has taken steps to provide a campus that is secure from potential intrusion. • The school shall demonstrate that it safeguards the health and safety of students. 	<ul style="list-style-type: none"> • Doc BB • Doc CC • Doc DD • Doc EE • Doc FF (if applicable)
5d – Support Services		<ul style="list-style-type: none"> • The school maintains a nursing policy to address the medical needs of its students. • If participating in the National School Lunch Program, the school adheres to all requirements of the program, 	n/a

		<p>including maintaining a wellness policy and procedures for meal reimbursement.</p> <ul style="list-style-type: none"> If providing transportation, the school follows all driver training and licensing requirements and ensures all vehicles meet school bus specifications. 	
5e – Information, Data and Communication	<ul style="list-style-type: none"> Records retention schedule (if applicable) 	<ul style="list-style-type: none"> The school shall demonstrate that it takes appropriate steps to safeguard student and personnel files. The school demonstrates communication with stakeholders when developing and implementing federal programs. 	<ul style="list-style-type: none"> Doc FF
6a – Additional Obligations	n/a	<p>Examples of additional obligations not measured by other CPF indicators:</p> <ul style="list-style-type: none"> Utilizing E-Verify to determine employee eligibility. Adhering to contractual performance-based enrollment limitations. The school has not entered into or amended a contract with an ESP without SCSC prior approval. 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. The school is not following its own financial policies. The school is not following policies in GaDOE’s Local Units of Administration (LUA) Manual. 	<ul style="list-style-type: none"> Doc C Doc D Doc E
6b – Continuing Obligations	<ul style="list-style-type: none"> (SCSC) FY 2018 Monitoring Letter (SCSC) FY 2017 Operational CPF Results (SCSC) FY 2018 CAP in response to Monitoring Letter 	<ul style="list-style-type: none"> The school shall demonstrate ongoing compliance related to previous monitoring-based corrections. 	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 22, 2018**. 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 “FY18” indicates that the school provided that documentation as part of its FY18 monitoring. A notation in the column labeled “Req” indicates that documentation is required from the school. **Should any document marked as “Web” or “FY18” 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: FY19_SchoolName_ID (Example: FY19_HappyHillsCharterSchool_A.pdf).

ID	Description of Document	Web	FY18	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			
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	Student grade level promotion and retention policy			
P	Policies related to student enrollment and lotteries <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>			
Q	Student/parent handbook and other school-wide notices provided to parents regarding school policies			
R	Procedures for conducting disciplinary hearings and appeals			
S	Policies and procedures for ensuring the enrollment, attendance, and success of students who lack a fixed, regular, and adequate nighttime residence			
T	Policies and procedures for serving students with disabilities			
U	Policies and procedures relating to the identification and service of students who are English learners			
V	Professional qualifications policy for teacher certification			
W	Organizational chart			
X	Employee handbook			
Y	Volunteer policies and procedures			
Z	Evidence school has reported a recent fire drill to the Office of Insurance and Safety Fire Commissioner			
AA	Policies and procedures for reporting child abuse and neglect			
BB	Policies regarding student health screening			
CC	Suicide prevention policy			
DD	Information about how the school is providing mandatory sexual abuse and assault awareness education for students in grades K – 9			
EE	If applicable: records retention schedule			

Appendix C – Example of FY19 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 FY19 as the school’s operational performance will continue to be evaluated throughout the school year through a variety of means.

FY19 Initial Operational Compliance Results Summary for Happy Hills Charter School (HHCS):

CPF Indicator	CPF Measure	Result	Explanation
1. Educational Program Compliance	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	Did Not Meet	Finding: HHCS’s student promotion and retention policy does not meet the requirements of O.C.G.A. § 20-2-283 and SBOE rule 160-4-2-.11 Suggestion: Improving assessment security in the school’s testing policies.
2. Financial Oversight	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.
3. Governance	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	Suggestion: Improving compliance with the Georgia Open Meetings Act.
	3(c) – Governance Training	Pending	Suggestion: 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.
4. Students and Employees	4(a) – Rights of All Students	Pending	Suggestion: Clarifying that HHCS utilizes parent volunteer requirements in a manner that is consistent with due process rights afforded to students under federal law. Suggestion: Conduct training to improve understanding of student religious rights at school.
	4(b) – Rights of Students with Disabilities	Did Not Meet	Finding: 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.
5. School Environment	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	Did Not Meet	Finding: 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.
6. Additional Obligations	6(a) – Additional Obligations	Did Not Meet	<p>Finding: HHCS’s inventory management system is not consistent with federal regulatory requirements.</p> <p>Finding: 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>Suggestion: Improve internal controls for check signing.</p> <p>Suggestion: 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 FY19 Revised Preliminary Operational Compliance Results Summary

Within 14 days of the SCSC receiving the school’s Corrective Action Plan, the school will receive an 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 by June 30 2019 to ensure your school will receive partial points on a particular measure for the FY19 CPF.** The SCSC will **not review any documents submitted after June 30, 2019 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).

FY2019 Revised Preliminary Operational Compliance Results Summary for Happy Hills Charter School (HHCS):

CPF Indicator	CPF Measure	Result	Explanation
1. Educational Program Compliance	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.
2. Financial Oversight	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.
3. Governance	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.

4. Students and Employees	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.
5. School Environment	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	Did Not Meet	<p>Finding: HHCS’s policy of reporting allegations of child abuse and neglect is not consistent with the requirements of state law.</p> <p>→INCOMPLETE CORRECTIVE ACTION PLAN: 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 not adequately remedied this finding.</p> <p>Finding: HHCS does not have an adequate suicide prevention policy and is not providing suicide prevention training as required by Georgia law.</p> <p>→COMPLETED CORRECTIVE ACTION PLAN: 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.

<p>6. Additional Obligations</p>	<p>6(a) – Additional Obligations</p>	<p>Did Not Meet</p>	<p>Finding: 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>→ COMPLETED CORRECTIVE ACTION PLAN: 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>Finding: Evidence provided by HHCS during the on-site visit by SCSC staff revealed that the school was not following its financial policies.</p> <p>→ SCSC WILL CONTINUE TO MONITOR HHCS’S ADHERENCE TO IT’S CORRECTIVE ACTION PLAN: 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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