



Internal Monitoring Report

June 12, 2018

Policy Title: Treatment of Students, Parents/Guardians & General Public
Policy Type: Executive Limitation
Policy No.: EL 2.1
Period Monitored: July 2017-June 2018

This report monitors the Board of Education's Executive Limitations Policy for the 2017-2018 school year.

The Superintendent shall neither cause nor allow organizational circumstances or actions for students, prospective students, their parents/guardians, and the general public that are unsafe, untimely, undignified, or unnecessarily intrusive or restrictive.

Among other things, the Superintendent shall not:

1. *Change any material District practice or condition without considering public input.*
2. *Use enrollment, application or similar forms that elicit unnecessary information from students, their parents, or users of District facilities.*
3. *Use any method of collecting, reviewing, transmitting, or storing student information that fails to protect against improper access to the material elicited.*
4. *Use any method of discipline for student behavior or dress that is unclear, undignified, unnecessarily restrictive or inconsistently applied.*
5. *(a) Operate schools, facilities and work sites without appropriate accessibility, safety, cleanliness, and privacy, or (b) fail to allow equitable and reasonable access for students, their families and the general public for non-disruptive activities.*
6. *(a) Unnecessarily restrict parents or students in their choice of schools or educational programs, or (b) unnecessarily fail to support a culture of choice/open enrollment District wide.*
7. *Fail to establish with students and parents/guardians a clear understanding of what may be expected, when it may be expected, and what may not be expected from the educational and other products and services offered.*
8. *Use any assessment or grading of students that is untimely, unclear, unnecessarily restrictive, irrelevant or inconsistently applied.*
9. *Fail to provide reasonable, relevant and timely information or responses to their inquiries.*
10. *Retaliate against any student or parent/guardian for non-disruptive expression of dissent or concern.*

11. *Operate without written rules which: (a) specify District and school expectations, standards and procedures; (b) provide for effective resolution of concerns, complaints, and grievances; and (c) protect against wrongful conditions and disparate treatment for inappropriate reasons.*
12. *Prevent students, parents/guardians or the general public from addressing complaints and concerns to the Board when internal grievance procedures have been exhausted and the person alleges that Board policy has been violated to his or her detriment.*
13. *Fail to inform students, parents/guardians and the general public of this policy, or to provide a way to be heard for persons who believe they have not been accorded a reasonable interpretation of their protections under this policy.*
14. *Operate without written District Operating Principles; fail to assess the climate and culture of the District around the written District Operating Principles by obtaining input from students, parents/guardians and the general public and publishing findings; or fail to advise the Board of any revisions made to the written District Operating Principles.*

This report is presented in accordance with the Board's monitoring schedule. I certify that the information is true and complete.

Sandra Smyser, Ph.D.
Superintendent of Schools

June 12, 2018

Executive Summary

This report monitors Executive Limitation 2.1 policy language as it deals with how district policies treating students, parents and the public prevent organizational circumstances or actions that are considered unsafe, untimely, undignified or unnecessarily intrusive/restrictive.

The evidence included in this monitoring report indicates that:

1. *When a material district practice or condition has changed, public input has been considered.* This can be seen in the following changes that occurred during 2017-2018 school year that incorporated public engagement activities. These changes can be put into two categories: annual changes and changes specific to this school year.

Annual Changes

- 2018-2019 Calendar
- Technology Refresh
- Instructional Materials Adoptions
- Budget Development

2017-2018 Specific Changes

- Purchasing Protocols
- Kindergarten Scholarships
- Reimbursements for staff
- Recruiting Software Selection and Implementation
- Student Fees
- School Start Times
- Central Office Reorganization

2. *Enrollment, application, and other forms do not ask for unnecessary information from students, parents, or users of district facilities.* This is facilitated through the Information Technology Department having reviewed the student enrollment form during the 2017-2018 school year to ensure that it collects the minimal information required by law.
3. *Collection, reviewing, transmitting and storing student information is protected against improper access to materials.* This can be seen through district procedures including utilization of the student enrollment form, information being entered by authorized school personnel, both paper and electronic records, electronic storage that allows for maintenance of an access log, paper forms stored in access controlled locations at current schools, student records being “checked” in and out of the Records Center, electronic student records assigned a unique identification number, information stored on servers with backup systems and physical student information being stored in a secure warehouse. New data privacy protocols were also implemented with regard to purchase of software that students use in the classroom and through the district.
4. *Methods of discipline for student behavior or dress are clear, dignified and positive.* This can be seen through annual review of the Student Rights and Code of Conduct, verification that across the district, an average of 96.7% of parents/students read and signed the receipt of Student Rights and Code of Conduct this year. Also, a review of disciplinary records for expulsions shows due process for each student and auditing of discipline by assistant superintendents when reviewing expulsion cases ensures progressive discipline.

5. *A) Operation of schools, facilities and work sites that allow appropriate accessibility, safety, cleanliness and privacy.* This can be seen through the permits, inspections and approvals of appropriate local governing bodies that district schools, facilities and work sites operate under.

B) The district allows equitable and reasonable access for students, families and the general public for non-disruptive activities. This can be seen through the more than 16,700 activity reservations by outside organizations before and after school hours from July 2017 through June 2018.
6. *Parents or students are not unnecessarily restricted in their choice of schools or education programs and the district supports a culture of choice/open enrollment district-wide.* This can be seen through the centralized on-line application process for school choice, having 26% of parents choose a school for their child other than their neighborhood school with no appeals made during the 2017-2018 school year. Additionally, more than 1,800 students were enrolled in an option school (100% choice) this school year.
7. *Students and parents have a clear understanding of what may be expected, when it may be expected and what may not be expected from educational and other services offered.* This can be seen with in-depth information provided to parents on the PSD website, information provided to parents upon request such as the PSD Schools Directory, Kindergarten marketing materials, 6th grade marketing materials, 9th grade marketing materials, boundary maps and parent e-newsletters from both schools and the District. Other forms of communication to parents include translation of materials into Spanish and Arabic (as needed), personnel at each site identified to answer questions from parents and the ParentVUE parent access portal for grades and other information about students.
8. *District assessments and grading of students is timely, clear, relevant, consistently applied and not unnecessarily restrictive.* This can be seen through the prescribed assessment calendar dictated by the Colorado Department of Education, monitoring of procedures for CMAS, CELA, & SAT along with trainings for coordinators at each site to ensure compliance with CDE mandated timelines.
9. *PSD provides reasonable, relevant and timely information or responses to student, parent and community inquiries.* This can be seen through the practice of having Cabinet level administrators respond to parent, student and community communications, when a response is warranted, within a time and manner that is appropriate, or as prescribed by law.
10. *The district does not retaliate against any student, parent/guardian for non-disruptive expression of dissent or concern.* This can be seen through investigation of incidents that are reported to the Assistant Superintendents and/or Executive Director of Human Resources. No substantiated acts of retaliation occurred the 2017-2018 school year.
11. *PSD operates with written rules that specify district and school expectations, standards and procedures, provides effective resolution of concerns, complaints and grievances, and protects against wrongful conditions and disparate treatment for inappropriate reasons.* This can be seen through the comprehensive nature of the Student Rights and Code of Conduct, which almost all parents/students sign as having read and received. This information is available via hardcopy and on the PSD website in English, Spanish and Arabic.
12. *The district does not prevent students, parents/guardians or the general public from addressing complaints and concerns to the Board when internal grievance procedures have been exhausted and the person alleges that Board policy has been violated to his/her detriment.* This is showcased by parents, students and members of the public having access to the Board of Education through written/email communications, phone calls, community engagement sessions and Community Comment at Board of Education meetings.

13. *PSD informs students, parents/guardians and the public of EL 2.1 and/or provides a way for persons to be heard who believe they have not been accorded a reasonable interpretation of their protections under EL 2.1.* This is showcased through posting of the policy on the PSD website and including references to it in staff and parent e-newsletters in August each year. A summary of the policy is also typically included in each school's newsletter in fall referring students and parents to the district's website where the policy can be found in its entirety.

14. *PSD conducts a parent engagement and satisfaction survey every two years and publishes the findings.* Staff is proposing to implement a new timeline for parent surveys with a new Parent Connection Survey to be implemented in Fall 2018. As such, the district did not meet expectations for this portion of the policy for the 2017-2018 school year.

APPENDICES:

A –2017-2018 Assessment Calendar

Interpretation

Policy Wording:

Among other things, the superintendent shall not:

1. *Change any material district practice or condition without considering public input.*

Interpretation:

The district interprets this to mean it will not adjust or alter the essential functions of PSD that have a long-term impact on students and the community without soliciting and listening to ideas from parents, students, staff and community members as appropriate.

Evidence:

The following issues/matters included community engagement during the 2017-2018 school year. In each instance, input was solicited from various stakeholder groups as identified and was factored into the decision-making process. Outcomes were then communicated back to the stakeholders involved.

Annual Changes

- 2018-2019 Calendar** - In Fall 2017, the Calendar Development Committee convened to discuss proposed options for the 2018-2019 Student Calendar. Options followed prior year schedules, starting towards the end of August with a focus on removing staff information from the calendar for easier understanding by families. The start dates were modified for elementary, middle and high schools to accommodate proposed workdays and collaboration days and one less day in December (which was added to allow families and staff to travel during the holidays.) Employee group representatives were part of the committee along with parents, administrators, classified and licensed staff members. The proposed 2018-2019 Student Calendar was discussed by the Superintendent's Cabinet as well as in Issue Resolution with representatives from HR, PEA, PASE and ACE. The final calendar was approved by the Board of Education in February 2018. Staff calendars were created by HR and placed on the PSD website with information specific to each work year by job classification: classified, licensed and administrative.
- Technology Refresh** - In Fall 2017, PSD convened the Educational Technology Advisory Committee (ETAC) to review prototypes for student devices. This committee included representatives from the community, 2010 Mill Monitoring Committee, high school students, parents and staff. The committee listened to feedback from students regarding the use of the devices as well as the functionality and what needed to be included for future use. Staff input was also solicited in terms of use of technology in instruction through a survey. The committee looked at different types of devices, with prototypes being piloted at select middle and high schools. After analyzing input and feedback from the pilot school staff and students, the committee recommended purchase of new devices for students. This purchase was completed in Spring 2018 through approval of the Board of Education.
- Instructional Materials Adoptions** - During the 2018-2019 school year, PSD conducted a process for several curriculum/instructional material adoptions including secondary science, elementary literacy and human development and sexuality.

For each adoption, the district created an adoption committee, comprised of teachers, administrators and parents, to review and discuss the new materials and curriculum. The human sexuality committee also included representatives from the Larimer County Health Department and members of the local LGBTQ community.

Committees looked at several vendors, weighing both staff and parent input. Input was also solicited from parents via the District Advisory Board (DAB) and DAB academic sub-committee. The materials were placed on display for public comment (with the review advertised in the Coloradoan and through the district's newsletter Great Happens Here) and teachers were given the materials to pilot. In Spring 2018, the Board of Education formally adopted the new curriculum and associated materials for implementation in the 2018-2019 school year. Parents and the community were notified of the new adoptions through the District's Great Happens Here newsletter in May 2018 and will be given more information through teachers and Back to School night meetings in fall 2018.

- D. **Budget Development** - Every year, PSD conducts the Budget Development process which includes feedback and input from both internal and external stakeholders.

For the 2018-2019 budget, initial conversations included the possibility of additional state funding through buy-down of the budget stabilization (BS) factor. PSD also projected a modest 1% enrollment growth. This, along with additional state funding and availability of 2016 Mill Levy Override dollars for one-time uses, allowed the district to propose a budget that fulfilled the Board of Education's budget priorities as follows:

- Competitive compensation for employees
- Increased safety and security including SROs, mental health specialists, behavior analysts and upgrades to security at schools
- Support for student growth including more modular buildings, school allocations for materials, equipment and technology, a school planner to help with innovative design of new buildings to enhance student experiences, and increased school allocations through student-based budgeting
- Support for federal programs in anticipation of potential future cuts
- Support for programs to increase graduation rates
- Increased budgets to buy updated instructional materials

Information regarding budget allocations and one-time use of Mill Levy Override funds were communicated through Tactical Leadership, Issues Resolution with the three employee group presidents, and the negotiations process. Feedback was solicited from these groups throughout the process as well as the Budget Advisory Group, a community group of parents and financial experts who review the budget and provide input and feedback regarding the situation and proposed plans.

Decisions and plans were widely communicated throughout the community through the following methods: District Advisory Board meetings, emails and newsletters to parents and staff, website stories and information pages, local media stories, the Audit Committee and Budget Advisory Group.

On June 12, 2018 the Board of Education adopted a balanced budget that funded critical programs and staffing along with providing competitive compensation for employees.

Specific Changes (2017-2018)

- E. **Purchasing Protocols** – For several years, the Audit Committee has expressed concerns about internal audit findings regarding internal control deficiencies and non-compliance with purchasing policy. With new leadership in the Purchasing Department, the Finance division looked at how to reverse this trend. After input from the Superintendent's Cabinet and Audit Committee regarding next steps, the district hired an external consultant to evaluate and make recommendations for proper procurement procedures. This recommendation included stricter controls on issuing POs, when to do bids and elimination of staff reimbursements. New protocols were devised, many of which were currently in policy just not being followed. Feedback and input regarding communication of the new protocols was solicited from various staff groups including principals, employee group presidents, office managers and bookkeepers. The new

protocols were communicated to staff via email and various staff meetings with extensive training and support provided by the Finance, Budget and Purchasing departments.

- F. **Full-day Kindergarten Fee Waivers** – PSD has historically provided full-day Kindergarten scholarships to students who qualify for free and reduced lunch. However, the number of scholarships was limited, so some families who qualified were unable to take advantage of full-day Kindergarten programming. Over the years, families had expressed concern that there was not an avenue for more scholarships and staff was concerned that the students with the most need were missing out on valuable instructional time. In Fall 2018, after discussion with Cabinet, principals and central office departments, the district decided to change how it was providing scholarships for full-day kindergarten tuition. Beginning with the 2018-2019 school year, students who qualify based on federal income guidelines (and whose families have indicated this information can be shared) will be provided with full-day Kindergarten waivers automatically, giving them access to full day Kindergarten programming. This decision was communicated to all incoming Kindergarten families in December and January, in anticipation of Kindergarten registration day in February 2018.

- G. **Recruiting Software Selection and Implementation** – In Fall Spring 2017, the Human Resources department, in collaboration with the purchasing and information technology departments, sent out an RFP for new software for applicant tracking, substitute reporting, evaluations and employee records. A cross functional committee, including representatives from schools, central office departments and HR, met to review the RFP submissions and determined that a new software, called Recruit and Hire, would best meet the needs of the district. Input was solicited from licensed and classified staff along with administrators along the way regarding what functions the new software needed to provide as well as look and feel of the new system. The new software was implemented in January 2018 after communication with hiring managers, departments and applicants currently in the system. The switch to the system was relatively smooth and HR continues to expand to new modules for better service to schools and new employees.

- H. **Student Fees** - In Spring 2017, the district began to list individual fees on the board-approved fee schedule to comply with state law. This process involved schools identifying all of the individual fees they planned to charge for the 17/18 school year. This process showed inconsistencies between schools and fees, which led to a more systemic look at how fees are levied and charged. With input from risk management, the two assistant superintendents, legal and policy counsel and the Superintendent’s Cabinet, the finance department implemented the new structure for the 17/18 school year. Feedback and input about the process and fees was solicited from staff at the schools and in departments at Central Office. Communication included information at meetings and emails to impacted staff as well as to families. As part of the new fee structure and online payment solution (see below), families were given greater access to the opportunity to apply for and receive waivers for certain fees. The new process allows schools to retain the discretion for setting fees subject to approval by the assistant superintendents and in compliance with state law.

- I. **Online payment solution** – For the last 5-10 years, parents have consistently requested that PSD allow families to make online payments for school fees and other costs. After an RFP process in 2017 (that included input from parents, staff and an outside consultant), a new system was purchased and integrated with PSD’s student information system. The new system, called SchoolPay, is a comprehensive payment solution for families, allowing for online payments and the ability to make those payments in accordance with the board approved fee schedule. This new opportunity was communicated to families via email and in back-to-school communications for the 2017-2018 school year.

- J. **School Start Times** – In Fall 2017, the Board of Education indicated it wanted the district to study the idea of moving school start times to later in the day. The focus was on secondary schools (middle and high schools) with the goal of keeping the change cost neutral. The district solicited feedback from parents, staff and the community through an online survey in Spring 2018. This survey received about three-times the normal response to district surveys and showed broad community support for a shift to later start times. In May 2018, PSD convened a Scenario Committee, with representatives from elementary, middle and high school parents, staff and administrators, to review potential scenarios. The committee was charged with making a recommendation to the district regarding which scenarios should be put to the community for additional input. As of June 1, 2018, the committee had met twice and was close to narrowing down scenarios for consideration. The committee will meet again in June and provide a final recommendation to the Superintendent’s Cabinet. These scenarios will form the basis for a second survey and community engagement discussions currently planned for Fall 2018. Once this input is received and analyzed, a final recommendation for school start times for the 2019-2020 school year will be made and presented to the Board of Education for consideration.
- K. **Central Office Reorganization** – In January 2018, the Superintendent unveiled her plan for restructuring Central Office to provide additional support for students at the schools and increase efficiencies in departments. The restructuring resulted in elimination of approximately 20 positions for the 2018-2019 school year primarily focused on the Student Achievement, Curriculum, Instruction & Assessment, MTSS, Educational Technology, Professional Development and Student Services departments. Human Resources followed procedures outlined in the Employee Agreement, working collaboratively with PEA and ACE. Through these efforts, the majority of impacted employees were placed in jobs within the district. The reorganization also resulted in \$1.5 million being allocated to schools for additional support for students with various focus areas. The reorganization was communicated broadly to staff and the community via email as well as the website and PSD’s Great Happens Here newsletter.
- L. **New District Website** – In July 2017, PSD launched its new district website, culminating two years of work by the Communications and Information Technology departments. The process began with an RFP and input on Scope of Work from IT and members of the community who work in the website industry. A second RFP was produced after the first failed to identify a suitable company to produce the desired results. This second RFP resulted in selection of a company to design, develop and launch a new district website with user friendly navigation and a password protected staff portal. Input on navigation and design was solicited through focus groups with parents, students, staff and community members as well as user testing of the beta site once developed. Input was also gleaned from community and staff members after the official launch in July 2017, with revisions constantly being made to ensure the district website remains a viable and effective means of communication between PSD and the community it serves. Feedback indicated the community and staff liked the new site and found it useful and informative, easy to navigate and aesthetically pleasing.

Communications and Community Engagement Activities for Changes Noted Above For the issues listed above, various proactive communications activities were carried out as detailed. Information varied based on the issue and target audience. In all instances, the issue, opportunities for public input, the outcome and actions taken were noted.

- Engagement sessions/meetings with stakeholders
- Updates to principals and administrators at leadership meetings as well as through email communications
- News posted to the PSD website homepage
- Targeted e-mails to principals, administrators, parents and all PSD staff

- Requests that principals share information with site teams, PTA/PTOs, volunteer coordinators, and staff
- Updates to the District Advisory Board as deemed appropriate by the Superintendent
- Television programming on PSD-TV Channel 10, with videos posted/linked to the PSD website
- Updates to emails for parents and community members via district-wide newsletters twice a month
- Story ideas pitched to local and Denver area media

Based on the engagement of stakeholders regarding changes to material practices, the district meets expectations for EL 2.1.1.

Policy Wording:

2. *Use enrollment, application or similar forms that elicit unnecessary information from students, their parents, or users of district facilities.*

Interpretation:

The district interprets this to mean that district documents used to collect information will ask for the minimal amount of information needed to fulfill health, safety, educational and business services. This information will be used for enrollment purposes, the educational assessment of students or state/federal reporting/grant legal requirements. This is reasonable as the district needs access to basic information for legal, educational, safety, and communication purposes.

Evidence:

The Information Technology Department and site representatives review the student enrollment form annually to ensure the District collects the minimal information needed to meet the requirements set by law, to communicate effectively with parents, and to fulfill health, safety, educational, and business services. The student enrollment form is reviewed to identify any additional fields for collection of necessary student information and to ensure the District continues to collect only the minimum information as required by law.

A focus group consisting of site and Information Technology personnel met throughout the 2015-16 school year and worked collaboratively to revise the form that adheres to the interpretation of this policy. The revised form was implemented for use beginning in the Fall of 2016. No modifications have been identified to revise the student enrollment form at this time.

With the review of these forms and attesting they meet the above standards, the district meets the expectation of Executive Limitation 2.1.2

Policy Wording:

3. *Use any method of collecting, reviewing, transmitting, or storing student information that fails to protect against improper access.*

Interpretation:

The district interprets this to mean that data (such as demographics, prior services, emergency contacts, special needs and health information) needed for enrollment purposes, the analysis of that information to determine an appropriate education plan for a student and the electronic or physical sharing of that information has documented procedures that protect it from unauthorized access. In addition, the electronic

or physical holding of information has security procedures that are documented and implemented to prevent unauthorized or ill-intended disclosure.

This is a reasonable interpretation because proper recordkeeping requires the district to maintain one record for each student. Tracking physical records prevents duplication. The district maintains an access log to ensure a physical file is accounted for and has not been compromised. These interpretations are reasonable since the district must have access to basic information to educate children accurately in accordance with their needs.

Evidence:

Evidence: The district utilizes the following procedures to ensure student information is kept secure:

- Incoming students and parent/guardians complete a Student Enrollment Form. This information is updated annually. Each student has a paper and electronic student record and is assigned a unique identification number within PSD. Information provided is entered by school office personnel that is limited to specific job roles.
- Access control procedures are in place for staff account creation and authorization for the student information system. Electronic access to student records is role-based and is updated to reflect personnel changes. Electronic storage allows the District to maintain an access log to ensure that electronic files have not been inappropriately accessed.
- All electronic student information is stored on encrypted servers that are restricted to certain Information Technology staff. The electronic student information is stored on these servers which have built in redundancy for hardware failure. Additionally, all student information is backed up and stored both on-site and off-site for disaster recovery purposes.
- All personally identifiable confidential student information shared via email to PSD staff is securely sent over the internal network and firewall. Staff are trained to send any personally identifiable confidential student information sent outside the District through the District's email encryption and verification process.
- All paper forms of student information (student records) for active students are stored in access-controlled locations at the student's current school. All other physical student records are stored at the PSD Records Center. Physical access to the Records Center is limited to Records Center personnel only. The paper student record is stored in a warehouse that is secured, temperature controlled and has a fire suppression system to hinder the destruction of physical records in a fire.
- Student records are moved between school sites and the District Records Center. The District Records Center "checks" records in and out to sites to provide tracking for the paper record. The electronic student record is associated with the student's current school and when students transfer or leave, the electronic record reflects this location change.
- The district uses a workflow management process with Purchasing and Contract Administration to ensure that when software is bought and solicits personally identifiable student information, as described by state law, a contract is in place with the vendor to protect student information.

Based on district staff reports that the district followed the procedures with all district records, the district meets expectations for Executive Limitation 2.1.3.

Policy Wording:

4. *Use any method of discipline for student behavior or dress that is unclear, undignified, unnecessarily restrictive, or inconsistently applied.*

Interpretation:

The district interprets this to mean that administrators will discuss documented procedures that violate administrative policies for behavior or dress that could result in suspension or expulsion with all students in the first four weeks of school. In addition, these policies follow due process and provide all students educational opportunities when disciplinary consequences require they be removed from their classes. Furthermore, the district assures progressive discipline methods are utilized (students may receive less discipline when a first infraction occurs) which is reasonable as students are not taken away from the learning environment unless they demonstrate continued infractions.

By using methods of progressive discipline, the district provides students opportunities to learn from mistakes rather than keeping them out of class. Given the size of the district, it is reasonable for the district only to monitor discipline that results in suspension for the purposes of this executive limitation.

Evidence:

The district communicates discipline standards through the Student Rights and Code of Conduct which can be viewed online or through a paper booklet. Schools review this information with students each August/September and track review by collecting parent and student signature receipts. The number of signatures is reported to the School Services Department for monitoring purposes.

As the Student Rights and Code of Conduct outlines standards for behavior, a consistent standard of conduct applies across the district. The district has defined categories of behaviors for suspensions and expulsions. The district tracks suspensions and expulsions, annually reporting these to the Colorado Department of Education. Legal counsel annually reviews the Student Rights and Code of Conduct to ensure it is as current and clear as possible.

A reasonable standard for verification is that 95% of students at the secondary level and 95% of parents at the elementary level sign a Receipt of Student Rights and Code of Conduct form indicating they have reviewed the document by the end of September each year. This is a reasonable measure since some students move to the school at various times and/or students are absent on the day the review was done.

In 2017-2018, approximately 96.8% of elementary students' parents signed the Receipt of Student Rights and Code of Conduct. About 97.5% middle school and high school students and parents signed the form.

Evidence for dignified discipline is shown through the district review of the disciplinary record for all expulsions along with a checklist indicating due process has been afforded the student. This is a reasonable standard since this provides a method for the district to audit the schools' practices. In the 62 expulsions conducted in the 2017-2018 school year, a due process checklist was reviewed to ensure due process was followed. Offenses included drugs, weapons, sex offenses, arson, assault and actions detrimental to the safety of others.

District disciplinary practices meet the standard for being unnecessarily restrictive given that the assistant superintendents audit discipline when reviewing expulsion cases to ensure progressive discipline as specified in state statute and the Student Rights and Code of Conduct.

In addition, students expelled from PSD are eligible to attend the district's expelled program. All expelled students and their parents are notified of this opportunity via a written letter. No formal appeals were filed in 2017-2018.

As of June 1, 46 of the 62 expelled students had enrolled in PSD's Journey Program (expulsion school). Of the remaining expelled students, 1 was in day treatment, 1 was committed to the Department of Youth Corrections, 2 moved out of the area, 1 was homeschooled, 3 refused contact and 1 got a GED. Note: 7 expulsions occurred late in the year and had not made decisions as of June 1, 2018.

Based on the information above, the district met the expectations outlined within Executive Limitation 2.1.4.

Policy Wording:

5. *(a) Operate schools, facilities and work sites without appropriate accessibility, safety, cleanliness, and privacy*

Interpretation:

The district interprets this as the physical design, equipment, policies, practices, or procedures that provide right of entry to district facilities will do so regardless of ethnicity, race, color, religion, national origin, ancestry, sex, sexual orientation, gender identity, age, or disability with reasonable freedom from injury, risk or health related issues. In addition, facilities, grounds and equipment are maintained at a functional, comfortable level, providing a safe, healthy environment for staff and students. Furthermore, policies, procedures and physical facilities ensure confidentiality of both personal and personnel records, correspondence and discussions.

Evidence:

District schools, facilities and work sites operate through permits, inspections, and the approvals of appropriate governing bodies. Because of district staff assurance that the appropriate permits, inspections, and approvals have all been maintained throughout the monitoring period the district meets expectations for Executive Limitation 2.1.5(a).

(b) Fail to allow equitable and reasonable access for students, their families, and the general public for non-disruptive activities

Interpretation:

The district interprets this as having policies and procedures that ensure PSD children enrolled in our schools, individuals related to those students and community members can use district facilities and grounds without giving a special status to any individual or group. In addition, this use will be for meetings and events that are non-violent, non-subversive, non-threatening, and in accordance with district policy or federal, state, and local law.

This interpretation is reasonable because the district is committed to making it simple for students, families, and the general public to use district property for activities and events that meet the standards of district policy or federal, state, and local law. The district also provides each group equal access to information pertaining to the policies and procedures for utilizing district-owned property for events and activities. Additionally, each request for use of district-owned property is processed and implemented according to administrative guidelines.

Evidence:

The following information represents the number of activity reservations by outside organizations scheduled through the PSD Customer Support Center (CSC) at all available PSD locations for events and meetings outside of regular school hours:

- July 1, 2017 – June 30, 2018: 16,787

School hours are defined as:

- 7:30a.m. -3:00 p.m. (Middle/High School)
- 8:00 a.m. -3:30 p.m. (Elementary School)

Outside of regular school hours are:

- Before school starts
- After school ends
- Weekends
- When school is not in session.

The district meets expectations in the area of having policy and practices that provide equitable and reasonable student access. Students use district facilities during school hours and student-initiated and led organizations conduct meetings and events on school premises as designated by the building principal according to rules for scheduling facilities. Students are made aware of these procedures and policies through staff at their school, as well as through the PSD website, student handbooks and school newsletters/emails.

The district meets expectations with regard to equitable access for students, families, and the general public. Students, families, and the general public are made aware of the procedures and policies associated with the use of district-owned property via the district web site. The website also contains information about the use of district property in Spanish and can be translated into Arabic and Korean.

Based on the fact that the district follows its policies and procedures for providing equitable and reasonable access for reservations made and direct reports of district staff, the district meets expectations for Executive Limitation 2.1.5(b).

Policy Wording:

6. *(a) Unnecessarily restrict parents or students in their choice of schools or educational programs, or (b) unnecessarily fail to support a culture of choice/open enrollment district wide.*

Interpretation:

The district interprets this as having policies and procedures in place that do not limit parents or student options to select instructional methods without cause. In addition, the district provides a mechanism for students and parents to apply for these educational programs.

This interpretation is reasonable because PSD has a tradition of choice grounded in the belief that parents know their child's learning style and should have options from which to choose to meet their child's needs. Further, the implementation of the district's choice/open enrollment policy guards against unnecessary restriction of students' and parents' choice of schools or educational programs. This interpretation applies to all schools.

Evidence:

The district consistently administers its policy, so it does not unnecessarily restrict parents or students in their choice of schools or educational programs while supporting a culture of choice/open enrollment district-wide.

Parents and guardians have equal access to school choice options by utilizing a centralized online application process. The online school choice application stores data centrally in a secure environment, automatically determining the order of priority of applicants and generating automated lottery lists for schools if the number of choice applicants exceeds the number of spaces available within a priority level for any grade. It also creates applicant wait lists for each school site.

Parents are informed of school choice via press releases to media outlets, direct mail brochures, school newsletters, district emails and the PSD website.

The following table illustrates the percentage of students attending a school other than their neighborhood school in 2017-2018.

Table 1.2

District Total, Families Exercising School Choice	
2014-2015	30%
2015-2016	28.5%
2016-2017	28.3%
2017-2018	25.73%

Policy JFBA states “Appeals regarding the consistent application of the choice policy with respect to any student shall be made to the superintendent of schools, and the superintendent’s decision and order (if any) shall be final.” There were no school choice appeals to the Superintendent in 2017-2018.

Based on the evidence outlined, the district meets the expectation of Executive Limitation 2.1.6.

Policy Wording:

7. *Fail to establish with students and parents/guardians a clear understanding of what may be expected, when it may be expected, and what may not be expected from the educational and other products and services offered.*

Interpretation:

The district interprets this as parents being able to access information about the services the district offers as well as expectations. In emergencies, parents will receive an email, phone call or text message (provided they have the medium necessary) to inform them of additional expectations.

This is a reasonable interpretation since people can independently access this information through the PSD website, school websites, community websites, electronic newsletters, local media, district emails and/or printed information provided at each school to learn about expectations.

Evidence:

The following documents/publications are distributed to current students each fall:

- Student Rights & Code of Conduct booklet
- Family Educational Rights Privacy Act (FERPA) Notification of Rights.

As stated in Section 2.1.4 of this report, students receive written and verbal information regarding behavior expectations within the first four weeks of school.

The following publications and online information sources provide in-depth information about PSD schools, district policies and educational options:

- PSD Website
- PSD Schools Directory
- PSD Annual Accountability Report
- Kindergarten Registration Information
- Elementary and Secondary Schools Choice Information
- High School Planning Guide
- Parent emails through Great Happens Here Newsletter (every 2 weeks)
- PSD Calendar of Early Childhood Programs (English and Spanish)
- PSD Staff E-News (quarterly)
- School Choice and registration timelines, forms, information
- Boundary Maps/school locator application
- Various department newsletters (Integrated Services, ELL, Early Childhood, GT)

In 2017-2018, PSD also distributed information to realtors, mailed postcards with choice information to all 5th and 8th grade PSD students, mailed Kindergarten registration information to all PreK households, gave a new High School Planning Guide to all incoming 9th graders through the middle schools and supplied materials to preschools and PSD schools to share with parents.

In cases of emergency the district uses electronic measures including e-mail, phone messaging, text messages, social media and website postings to keep parents informed about situations.

Other forms of communication include:

- Communication with Non-English-speaking families: Critical documents and forms are translated into Spanish and Arabic. Critical district-wide emails to families are also translated into Spanish, Arabic, Chinese and Korean. The district office and schools have access to Spanish and Arabic interpreters who can answer questions and assist families. Emergency messages are also translated into Spanish, Arabic, Chinese and Korean and sent via the School Messenger system to identified families via email and voice when available. The PSD website also features a translation button on the home page listed in native language (and writing) for Spanish, Arabic and Korean.
- Personnel at each school and the district answer questions and explain where to find information about schools and services, and/or mail additional information to parents.
- ParentVUE, the parent portal for the student information system, is located on the Parent page of the PSD website as well as linked from all middle school and high school websites. This allows parents a quick and highly individualized snapshot of each student's specific information, including: schedule, grades, state assessment performance, upcoming assignments and information specific to their child's school(s).

Because publications, documents and in-depth information are available to parents through a wide variety of communications vehicles, the district meets the expectations of Executive Limitation 2.1.7

Policy Wording:

8. *Use any assessment or grading of students that is untimely, unclear, unnecessarily restrictive, irrelevant, or inconsistently applied.*

Interpretation:

The district interprets this as using measures of performance across schools and grades by classroom teachers that fit within a timeframe required by the assessment or grading practice that are appropriate to the age and instructional level of the student and applied to all students. In addition, these practices involve administration of an assessment or grade by establishing rules within what is required by the test or for a grade.

Evidence:

Assessments are given within the timeline and with the restrictions prescribed by the Colorado Department of Education or the test publisher. Processes and procedures are consistently applied, following the District-wide Assessment Calendar (Appendix A).

The district monitors assessment procedures for required state and district assessments. Trainings occur with School Assessment Coordinators and school sites to ensure compliance with sites also receiving procedure manuals. In addition, the PSD assessment department, in collaboration with informational technology and curriculum staff members, conducts on-site visits and offers personal support during testing windows. The department also follows up with coordinators in response to concerns over testing improprieties.

The district offers end-of-year summative assessments in Language Arts, Math, Science, and Social Studies. Summative assessments are also administered by Business and Marketing, Technology Education, and Family & Consumer Science teachers at the secondary level. Additionally, World Language teachers administer summative assessments for French, Spanish, and German. The content for the PSD summative assessments is established by cross-district curriculum assessment teams, which are led by PSD curriculum facilitators.

Grading Practices PSD employs nearly 2,000 teachers who administer grades to nearly 30,000 students. The district does not monitor individual grades for each teacher, but rather sets broad guidelines for consistency based on the Colorado Academic Standards. Teachers are expected to grade based on proficiency as measured by mastery of the standard.

Because the district assessments and grade procedures are timely, clear, relevant, consistently applied and not restrictive, the district meets the expectation of Executive Limitation 2.1.8.

Policy Wording:

9. *Fail to provide reasonable, relevant and timely information or responses to their inquiries.*

Interpretation:

The district interprets this limitation to mean that members of the Superintendent's Cabinet will evaluate communications from stakeholders with inquiries and concerns and determine if a response is warranted. If a response is found to be warranted, members of the Cabinet will respond in a manner and time that is appropriate or as prescribed by law. The response will have information that addresses the issue or note that the request requires additional resources and time to appropriately answer it. In some cases, it may be determined that the request requires excessive staff time and resources and may not be fulfilled. If this is the case, the requestor will be notified.

This is reasonable as some information may require additional time to account for the need to investigate and accurately curate answers to inquiries/concerns.

Evidence:

During the 2017-2018 school year, members of the Superintendent's Cabinet reported receiving many phone calls or e-mails with concerns and inquiries from parents, members of the community and students. After evaluating the communication(s), if a response was warranted, these senior staff members provided reasonable, relevant and timely information in response to the concerns/inquiries.

For this reason, the district meets the expectations for Executive Limitation 2.1.9.

Policy Wording:

10. *Retaliate against any student or parent/guardian for non-disruptive expression of dissent or concern.*

Interpretation:

The district interprets this to mean withholding or limiting educational opportunities and services when students use words, written symbols or gestures that show a difference of opinion or point of view in non-violent, non-subversive, non-threatening ways in accordance with district policy or federal/state/local law.

This interpretation is reasonable because the concern often expressed by students and parents is that they will be treated unfairly if they express an opinion contrary to a teacher's or administrator's point of view.

Evidence:

When allegations of retaliatory acts occur, the district investigates immediately. According to the Executive Director of Human Resources, no substantiated acts of retaliation occurred during this monitoring period. Based on this evidence, the district meets the expectation of Executive Limitation 2.1.10.

Policy Wording:

11. *Operate without written rules which: (a) specify district and school expectations, standards and procedures; (b) provide for effective resolution of concerns, complaints, and grievances; and (c) protect against wrongful conditions and disparate treatment for inappropriate reasons.*

Interpretation:

The district interprets this as having procedures and policies written and adopted by the district and Board to enact state and federal laws and policies, and administrative policies of the district. In addition, these procedures are those identified in law, administrative policies, and in the Student Rights and Code of Conduct that allow for an appeal to the district level. Furthermore, these procedures will not result in an educational placement for students that does not fall within the standards identified in federal or state law or district guidelines.

This is reasonable because the district is accountable to operate within state and federal law, as well as district policies, which are outlined, updated regularly and posted on the website. In addition, students receive written and verbal information regarding the appeal process to effectively resolve concerns, complaints or grievances. Schools also review this material with students having students sign a Receipt of Student Rights and Code of Conduct form. Furthermore, the district provides alternative educational environments, as appropriate, when students are placed out of class for disciplinary reasons.

Evidence:

The district provided a written outline and procedures for students and parents to resolve concerns and complaints in the 2017-2018 Student Rights and Code of Conduct.

The district meets expectations since the district operates with written rules that are stated in the Student Rights and Code of Conduct, which is published on the website and hardcopy in English, Spanish and Arabic.

The district meets expectations in protecting against wrongful conditions and disparate treatment for inappropriate reasons by providing students the opportunity to complete a school alternative. The district also provides educational options for all students when disciplinary issues require that the student be out of class.

For these reasons, the district meets the expectations of Executive Limitation 2.1.11.

Policy Wording:

12. *The district does not prevent students, parents/guardians or the general public from addressing complaints and concerns to the Board when internal grievance procedures have been exhausted and the person alleges that Board policy has been violated to his/her detriment.*

Interpretation:

The district interprets this as stopping students, parents/guardians and the general public from expressing a complaint or concern to the Board when avenues and procedures within the school/district for resolving them have been utilized in their entirety and the person claims that Executive Limitations have not been followed, which has caused the person harm or disadvantage.

This interpretation is reasonable because students and parents have a right to resolve their concerns and complaints within all levels of the district along with a right to all of the educational opportunities and services permissible under Board policy, administrative policies and state law. In addition, students and parents/guardians have a right to due process when there is a belief or interpretation that Board policy has not been followed.

Evidence:

Students, parents/guardians and the general public have access to the Board of Education through written/email communications, phone calls, community engagement sessions and Board of Education meetings. These avenues of communication allow for groups or individuals to express their complaints and concerns whether they have utilized the appropriate channels for problem solving with district staff or not, as well as when they believe Board or administrative policies have been violated.

Since the district has not prevented grievances to the board, it meets the expectations of the Executive Limitation 2.1.12.

Policy Wording:

13. *Fail to inform students, parents/guardians and the general public of this policy, or to provide a way to be heard for persons who believe they have not been accorded a reasonable interpretation of their protections under this policy.*

Interpretation:

The district interprets this to mean it will provide students and parents with an electronic description of the policy and provide additional information regarding their right and the right of the community to be heard by posting all administrative policies pertaining to these rights on the district website. In addition, the district will provide an appeal process which allows students and parents/guardians the opportunity to appeal student discipline decisions to the building principal or designated district administrator when students or parents/guardians believe they have not been afforded protections under this policy.

This is reasonable because students receive written and verbal information regarding appeal processes when students or parents/guardians do not believe they have been afforded a reasonable interpretation of their protections under this policy. The district posts administrative policies that outline this process on the PSD website.

Evidence:

The district meets expectations for providing notification to students and parents/guardians by posting this policy on the district website and including references to it in staff and parent emails.

A summary of this policy is included in each school's newsletter in the fall referring students and parents to the district's website, where the entire policy can be found.

For these reasons, the district meets the expectation of EL 2.1.13.

Policy Wording:

14. *Operate without written District Operating Principles; fail to assess the climate and culture of the District around the written District Operating Principles by obtaining input from students, parents/guardians and the general public and publishing findings; or fail to advise the Board of any revisions made to the written District Operating Principles.*

Interpretation:

The district interprets this as having established and approved Operating Principles, conducting surveys regarding parent engagement every other year and posting the executive summary on the website. In addition, the district will inform staff, parents and the board of the results and let the Board know in writing or via board presentation about any changes to the approved Operating Principles.

This is reasonable because the District will survey parents and the community every other year through the Parent Engagement Survey and report out the results at board meetings and through the District website.

Evidence:

The District was initially planning to conduct a parent engagement survey in Spring 2018. However, Cabinet members and staff from the Research and Evaluation Department determined that the existing instrument was not conducive to the needs of the district. Furthermore, a national survey through the Department of Education did not have questions or areas that PSD found useful in its efforts to improve parent engagement. After discussion at Cabinet, along with conversations with central office staff and principals, it was determined that a Parent Connection Survey, similar to the current Student Connection Survey, would better meet the needs of this policy and align with the District Ends.

The Research and Evaluation department, in collaboration with the Superintendent and her Cabinet, will create a Parent Connection survey to be sent to all PSD parents in Fall 2018. This timing will coincide with the Student Connection Survey, with results being included in the DE 1.0 Internal Monitoring Report and in EL 2.1

Monitoring Report in Spring 2019. Results also will be published on the PSD website and communicated to families and the Board of Education through normal communication channels.

For the reasons listed above, while the District did not meet the expectation of EL 2.1.14 during the 2017-2018 school year, it will meet them during the first semester of the 2018-2019 school year with a better aligned instrument that will provide value to the district and Board of Education regarding parent engagement and sentiments moving forward.