



Internal Monitoring Report

June 8, 2021

Policy Title: Treatment of Students, Parents/Guardians & General Public
Policy Type: Executive Limitation
Policy No.: EL 2.1
Period Monitored: July 2020-June 2021

This report monitors the Board of Education's Executive Limitations Policy for the 2020-2021 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. It is important to note that the work outlined in this monitoring report looked different in the 2020-21 school year due to the COVID-19 pandemic, compared with past monitoring periods.

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.

Todd Lambert, Ph.D.
Interim Superintendent of Schools

June 8, 2021

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 2020-2021 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

- 2021-22 District calendar
- Budget development

2020-2021 Specific Changes

- PSD superintendent search
- District COVID-19 response and consideration of educational phase changes (survey to solicit input from students, families, staff). The District also solicited input regarding interest in PSD Virtual, meal services and internally from PSD COVID-19 Response teams as District case response protocol changes were considered.
- School Resource Officer program evaluation and Community Advisory Committee recommendations
- Public input for naming of new Bamford Elementary School

2. *Enrollment, application, and other forms do not ask for unnecessary information from students, parents, or users of District facilities.* As the Information Technology department has built out PSD's Online Registration (OLR) system through Synergy, the District's student information system, the department has constantly reviewed the data requested. IT will review the OLR system and data collected again in fall 2021 for the 2022-2023 application process.
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. Data privacy protocols are implemented with regard to purchase of software that students use in the classroom and software used throughout the District.

PSD also implemented protocols specific to COVID-19 and completion of state-required contact tracing investigations between the District and Larimer County Department of Health and Environment. In accordance with [District Policy JRA/JRC - Student Records / Release of Information on Students](#), PSD may disclose student education records or personally identifiable information without written consent of the parent/guardian or eligible students under several circumstances, including if the disclosure is in connection with an emergency, if knowledge of the information disclosed is necessary to protect the health or safety of the student or other persons. Additionally, according to the [Colorado Department of Public Health and Environment](#), "Schools are required to disclose names of people with COVID-19 to public

health authorities. Schools should not disclose the name(s) of students, teachers or staff members with COVID-19 to other teachers, staff, students, parents, the media, or anyone outside public health. Public health staff are trained in how to manage health information in order to protect your privacy. They will never share your information without your permission, and they store records securely and keep them safe.”

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 and verification that across the District 97.1% of parents/students reviewed and signed the receipt of Student Rights and Code of Conduct this school year. During the 2020-21 school year, PSD for the first time made discipline data publicly available, as part of the annual release of the Internal Monitoring Report. Work has been underway and will continue to review these data and PSD’s discipline practices.
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. Throughout the COVID-19 pandemic, the District invested significant time and money (for training and the purchase of new equipment, such as hydrostatic backpack sprayers) to ensure that it was complying with county, state and federal guidelines and mandates for cleaning and disinfecting.

B) The District allows equitable and reasonable access for students, families and the general public for non-disruptive activities. This can be seen through thousands of activity reservations by outside organizations in typical school years. Please note that the number of reservations for 2020-21 is greatly reduced from the last reporting year of 2018-19, as a result of PSD closing its facilities to outside rentals for a significant period of time during the COVID-19 pandemic.
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 Districtwide.* This can be seen through the centralized online application process for school choice, having 24.6% of parents choose a school for their child other than their neighborhood school with no appeals made during the 2020-21 school year. Additionally, as of the 2020 October Count, 2,578 students attended option schools. October Count date were used to keep data consistent with past reporting years.
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 (email, phone, in-person, text messages); support of families who/whose child speaks a language other than English, through translated materials and connection to family liaisons; Districtwide communication resources, such as the PSD Schools Directory and school/program marketing materials; boundary maps; PSD’s social media platforms; direct communications from the District; and family newsletters from both schools and the District. Other forms of communication to parents include personnel at each site identified to answer questions from parents, and the ParentVUE parent access portal that contains information regarding grades and other information about that parent’s student(s). Knowing that access to timely and accurate information is more critical than ever during a pandemic, PSD created an extensive library of COVID-specific web pages on the District website with information about COVID-19 protocols, contact tracing investigations, mental health support, family resources, COVID-19 data dashboards and much more.
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, ACCESS for English Language Learners, DIBELS/Acadiance, Teaching Strategies GOLD, CogAT, NWEA MAP (alternate PROGRESS), and SAT, along with trainings for coordinators at each site to ensure compliance with CDE-mandated timelines. The 2020-21 school year was unique in that the State of Colorado was granted a waiver to reduce the number of assessments administered in spring 2021 due to COVID-19.

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 and other employees 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. PSD's Communications Department also responds to inquiries sent to PSD via its social media platforms, as well as the public email address info@psdschools.org, within a timely manner when a response is warranted. The Communications Department, other departments and schools responded to collective thousands of parent, community member, student and staff questions and feedback during the 2020-21 school year as a result of the COVID-19 pandemic.
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 2020-21 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 about 97% of parents/students signed as having read and received in the 2020-21 school year. Due to remote learning and budget cuts during COVID-19, the Code of Conduct was provided electronically only. It is also publicly available on the PSD website.
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 and Community Comment at Board of Education meetings. The Board of Education did not host its usual in-person community engagement sessions due to the COVID-19 pandemic but did solicit robust feedback during the PSD superintendent search during the 2020-21 school year.
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. 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 "Student Connection Survey" annually to solicit feedback from parents/guardians about how connected their student(s) is/are to their education and the adults within PSD.* After launching the "Family Engagement Survey" in the 2018-19 school year, PSD conducted the survey once again in the 2020-21 school year. The "Family Engagement Survey" replaced the National Center for School Leadership's "Parent Engagement and Satisfaction" survey. This was previously administered to parents every other year.

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 2020-21 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

- A. **2021-22 District calendar** - The Calendar Development Committee convenes to discuss options for and changes to the District's calendars. The committee proposed and the Board of Education approved a new process by which the board approves the calendar for the upcoming school year further ahead of time, allowing staff and families to make plans with more advanced notice. The 2021-22 calendar was approved by the Board of Education in April 2020. Draft calendars for future school years are available on the [Calendars and Schedules web page](#) on the PSD website and are subsequently brought to the school board for approval.
- B. **Budget Development** - Every year, PSD conducts the budget development process, which includes feedback and input from both internal and external stakeholders. This process culminates in the Board of Education's vote to approve the fiscal year budget by a deadline mandated by the State of Colorado.

PSD reimagined its budgeting process between the 2020-21 and 2021-22 development years. Throughout the 2020-21 school year, a new Budget Design Team reexamined the District's historical student-based budgeting, or SBB, process. The team focused its redesign on need to assist with school funding and workload issues. Minor adjustments were made to high-need areas outside of school budgets, such as for the Transportation and Custodial departments.

The Budget Design Team's work will continue throughout the 2021-22 school year and be foundational to the development of the 2022-23 fiscal year budget. Work in the years ahead will be focused on needs-based staffing and operating budget adjustments in non-school areas, while further aligning PSD's financial resources with the District's academic goals and major projects.

Information regarding budget development was communicated through the PSD Budget Design Team and its subcommittees, to principals, at Issues Resolution with the three employee group presidents, and in the annual 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. The Audit Committee was also updated.

Information about the budget is available through the PSD website, and an announcement will be posted to the site following successful approval by the Board of Education of the 2021-22 fiscal year budget.

Specific Changes (2020-21)

- C. **PSD Superintendent Search** – Following a months-long national search, the [PSD Board of Education named Brian Kingsley as PSD's new superintendent](#) during a meeting April 13, 2021. The board voted 7-0 to approve his appointment. He was selected from among 28 applicants.

The PSD Board of Education hired education **consulting firm Hazard Young Attea & Associates, or HYA**, to help conduct a nationwide search and identify strong candidates. As part of the superintendent search process, HYA conducted three virtual community forums, 21 focus groups and individual interviews with stakeholders to learn about what members of our communities want to see in the next superintendent. The firm also collected data from a survey of PSD stakeholders. In total, 2,345 people completed the survey, including parents/guardians, staff, students, community partners and taxpayers without children currently in school. HYA compiled the results of all community engagement efforts into a Leadership Profile Report. HYA also hosted two virtual forums on April 1 and 2 for PSD staff and community members to meet the superintendent finalists.

- D. **District COVID-19 Response** – Poudre School District constantly adapted plans, protocols and operations based upon ever-changing public health guidelines and requirements during the 2020-21 school year. Countless updates were communicated via the District's various platforms. As part of this process, the District solicited input on a variety of topics, ranging from how students, parents and staff felt about PSD's four educational phases (remote, small groups, hybrid and in-person learning) through a first-semester survey. PSD also asked families to indicate their interest in PSD Virtual, the District's 100% online learning option for the 2020-21 school year, and meal services. Internally, feedback was gathered through trainings, emails and calls with and surveys of the department and school COVID-19 Response Teams, as PSD updated case response protocols throughout the year.
- E. **School Resource Officer Program Evaluation** - In spring of 2020, members of PSD communities expressed concerns about the presence of school resource officers in PSD's schools. Concerns included but weren't limited to the existence of a school-to-prison pipeline and the lifelong impact it has on some students in our schools, particularly students of color. The PSD Board of Education directed the school District to conduct a comprehensive review of the issue to determine whether to continue the SRO program. Poudre School District's Community Advisory Council (CAC) was formed as a result and assisted the District with reviewing the School Resource Officer (SRO) program to help determine if the program will continue in PSD schools. The CAC, made up of community and PSD representatives, was an important part of the District's comprehensive review, which included community engagement, data analysis, feedback and recommendations to the board. In April, the CAC presented the school board with a final report containing a multitude of recommendations. The CAC also worked with PSD staff to administer the [SRO surveys](#) to staff, families and students in spring 2021. Among all the surveys, there were 11,088 responses. Dozens of individuals also shared their feedback throughout summer 2020 and the 2020-21 school year during the Community Comment portion of school board meetings.

At a May 11, 2021 meeting, the PSD Board of Education voted to direct District staff to continue the SRO program in PSD schools. As part of this decision, staff were asked to draft agreements between the District and the three law enforcement agencies – Fort Collins Police Services, Larimer County Sheriff's Office and Timnath Police Department – that employ the SROs who serve PSD schools. Pending successful negotiations with the three contracted law enforcement agencies, a final version of the contracts will go back to the Board of Education for its review at a future meeting. Directors will

ultimately vote on whether to approve the agreements, which would be in place for the 2021-22 school year. The Board of Education also gave staff directions to update the [Standard Operating Procedures, or SOPs, that outline the scope of work of a school resource officer in PSD schools](#). The board indicated that it wants staff to integrate feedback from the [Community Advisory Council's final report and recommendations to the board](#), among other community and board input, into the contracts and/or SOPs, where appropriate. [SOPs](#) will be finalized prior to the start of the 2021-22 school year.

- F. **Public Input on New School Naming** – Poudre School District's Board of Education voted Oct. 13, 2020 to approve the name of the District's new, under-construction southeast elementary school: Bamford Elementary. The school is named to honor the memory of the late Gary Bamford, a long-time PSD principal and staff member.

The superintendent appoints a committee that makes a recommendation for the naming of a new District site, according to District policy. In spring 2020, PSD solicited name recommendations from the community; those recommendations and the rationale behind them were submitted to the committee. After reviewing all recommendations, the committee submitted three proposals to then-PSD Superintendent Dr. Sandra Smyser. That recommendation was ultimately brought to the Board of Education, which voted to approve the name.

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 and one-on-one or school team communications
- News posted to the PSD website, social media accounts
- Targeted e-mails to principals, administrators, parents, key community communicators, PSD staff and all students (grades 9-12) (a new email audience addition for 2020-21)
- Requests that principals share information with site teams, PTA/PTOs, volunteer coordinators, staff, all families
- Updates to the District Advisory Board as deemed appropriate by the Superintendent/Assistant Superintendents
- Updates to department and school COVID-19 Response Teams regarding changes to protocols, requests to share information with staff and families
- Television programming on PSD-TV Channel 10, with videos posted/linked to the PSD website/shared via PSD social media accounts and YouTube
- Updates for parents and community members via District-wide newsletters sent weekly for the first couple months of the school year, followed by every other week for the remainder of the year
- Story ideas pitched to local and Denver-area media; responses to media requests for interviews and information
- Coordination of strategic surveying of parents, students and staff in alignment with District policies and procedures

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:

As the Information Technology department has built out PSD's Online Registration (OLR) system through Synergy, the District's student information system, the department has constantly reviewed the data requested. As the OLR system has been built up, additional fields have been enabled that may not be "required by law" but are important to the operations and efficiencies of getting students enrolled with services (e.g. need for busing for summer programming). IT will review the OLR system and data collected again in fall 2021 for the 2022-2023 application process.

It is impossible for staff to determine whether all "similar forms," outside of the enrollment and application forms, elicit unnecessary information from students, their parents, or users of District facilities. However, PSD has policies [JRA/JRC – Student Records / Release of Information on Students](#) and [JRCB – Privacy and Protection of Confidential Student Record Information](#) that have applications in regard to this executive limitation.

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 addition, these policies follow due process and provide all students educational opportunities when

disciplinary consequences require that 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 to monitor discipline that results in expulsion 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 and is available in multiple languages. Schools typically review this information with students each August/September. The District tracks review by collecting parent and student signature receipts. The number of signatures is reported to the Assistant Superintendent's Office (formerly School Services) 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 (SRCOC) to ensure it is as current and clear as possible.

A reasonable standard for verification is that, in the 2020-21 school year, 97.1% of parents/students reviewed and signed the receipt (acknowledgement) of SRCOC (not including charters). PSD utilized ParentVUE and StudentVUE to capture acknowledgements from parents/students; this process helps with more accurate data collection. Due to the factors of remote learning and budget cuts during COVID-19, PSD opted to make the Code of Conduct available in a digital format only for the 2020-21 school year. It is likely this means of accessibility will continue in the school years to come.

Each spring, District administrators review the Student Rights & Code of Conduct booklet and draft proposed revisions, additions and deletions to (a) improve and refine the policies and regulations contained therein, (b) ensure that they are in compliance with governing law, and (c) ensure that they reflect current District practices. Revisions to sections of the Code of Conduct that were brought to the Board of Education in spring 2021 included those pertaining to student dress and student conduct involving drugs and alcohol.

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. 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.

It is important to note that PSD made its discipline data publicly available for the first time during the 2020-21 school year, releasing it within the context of the [DE 1.0 Monitoring Report](#). The data-visualization tool is called "Equity Insight" and is being used to better understand PSD's discipline data as a means of evaluating outcomes for students. These data will be discussed and refined over time.

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:

In a typical year, the PSD Customer Support Center works with community members and groups to schedule thousands of facility rentals. Between July 1, 2018 and June 30, 2019, for example, there were 21,712 activity reservations of PSD facilities. Due to the COVID-19 pandemic, however, PSD did not rent its facilities (indoor or outdoor) to outside groups from March 2020 through a majority of the 2020-21 school year. As of March 22, 2021, PSD started allowing reservation of PSD outdoor facilities by community groups.

In a more typical school year, 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 website. The website also features a tool that allows users to translate content immediately into other languages.

Since 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 Colorado law gives parents/guardians the right to School of Choice, and 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 school and District newsletters and emails, school websites, and the PSD website and social media platforms.

The following table illustrates the percentage of students attending a school other than their neighborhood school in 2018-2019.

As of the 2020 October Count, 24.6% of students attended a school other than their neighborhood school. Also, as of the 2020 October Count, 2,578 students attended option schools (Harris, Kinard, PSD Global Academy, Polaris, Traut, Poudre Community Academy, Centennial High School and PSD Options). October Count date were used to keep data consistent with past reporting years.

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 2020-21.

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 cases of emergency, the District uses electronic measures including email, phone/voicemail messaging, text messages, social media and website postings to keep parents informed about situations (provided they have the medium(s) necessary).

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, PSD social media accounts, and/or printed information provided at each school to learn about expectations.

Evidence:

The following documents/publications are distributed (in print and/or electronically) 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 typically 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 and social media platforms (Twitter, Facebook, Instagram, YouTube)
- PSD Schools Directory
- PSD Annual Accountability Report
- Kindergarten and online school registration information
- Elementary and secondary schools School Choice information
- High School Planning Guide
- Parent emails through Great Happens Here newsletter (the frequency was weekly the first few weeks of 2020-21 and shifted to every other week for the rest of the school year)
- PSD staff newsletter (the frequency was weekly the first few weeks of 2020-21 and shifted to every other week for the rest of the school year; this is a change from quarterly publication in non-pandemic school years)
- PSD calendar of Early Childhood Programs (English and Spanish)
- School Choice and registration timelines, forms, information
- Boundary maps/online school-locator application
- Various department newsletters (Integrated Services, Language Culture and Equity, Early Childhood, etc.)
- Channel 10/PSDTV

Other forms of communication include:

- The District sent dozens of email/voicemail updates to staff and families throughout the 2020-21 school year related to major topics including but not limited to: COVID-19 response, protocols and operations; equity, diversity and inclusion; the PSD superintendent search; and more.
- 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 and Arabic. The District office and schools have access to Spanish and Arabic interpreters/trained family liaisons who can answer questions and assist families. Emergency messages are also translated into multiple languages and sent via the School Messenger system to identify families via email (and sometimes voicemail, depending on the type of communication). Parents must have the language-to-home feature selected in order to receive communications in their preferred/needed language. The PSD website also features a Google translation button (in the upper right-hand corner) for dozens of languages. The Communications Department works closely with District translators to ensure that translations are clear, consistent and high-quality so information is as equitable as possible.
- Personnel at each school and the District answer questions and explain where to find information about schools and services, and/or email/mail additional information to parents. This was never truer than throughout the COVID-19 pandemic, with staff going above and beyond to make sure that families knew where and how to access critical updates.
- ParentVUE, the parent portal for the student information system, is located on the Parent web 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 but not limited to 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](#).

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.

Please note that the administration of assessments in the 2020-21 school year looked different than typical years due to COVID-19. On March 26, 2021, the Colorado Department of Education announced that the state legislature and U.S. Department of Education reduced the Colorado Measures of Academic Success (CMAS) tests that students will take in spring 2021 due to the unique circumstances Colorado schools and Districts are facing as a result of the pandemic. Parents had the options of opting their students out of testing, as well as opting them into tests that were optional during the 2020-21 school year.

Grading Practices PSD employs roughly 1,700 licensed teachers who administer grades to roughly 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. PSD's Communications team also responds to inquiries that are sent to PSD via its social media platforms, as well as the public email address info@psdschools.org, within a timely manner when a response is warranted.

Evidence:

During the 2020-21 school year, members of the Superintendent's Cabinet reported receiving many phone calls or emails 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 (or their designees) provided reasonable, relevant and timely information in response to the concerns/inquiries. The Communications Department, PSD Customer Support Center, other departments and schools responded to thousands of parent/guardian, community member, student and staff questions and feedback during the 2020-21 school year as a result of the COVID-19 pandemic.

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 and Director of Student Services, 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 and have 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 2020-21 Student Rights and Code of Conduct. This information is available on the PSD website.

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 available 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 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. The Board of Education did not host its usual in-person community engagement sessions due to the COVID-19 pandemic. However, as an example of virtual engagement, the board solicited robust feedback as part of the PSD superintendent search in the 2020-21 school year.

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 that 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. Additionally, a summary of this policy is typically 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 and conducting surveys regarding parent/student connections and perceptions. The District will inform staff, parents and the Board of Education 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 through the "Family Engagement Survey," and report the results at Board meetings and through the District website. Additionally, the Board of Education is aware that staff have been working to replace the Operating Principles with new "Principles of Community," developed with input from PSD staff and other stakeholder groups. Work on these principles will continue in the 2021-22 school year and beyond and integrate with broader efforts to develop the District's climate and culture.

Evidence:

The District initially planned to conduct a parent engagement survey in spring 2018. However, Cabinet members and staff from the Research and Evaluation Department determined 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 discussions among District leadership teams, it was determined that a locally developed "Family Engagement Survey" would better meet the needs of this policy and align with the District Ends. The "Family Engagement Survey" was, once again, administered in spring 2021.

The Research and Evaluation Department, in collaboration with the Superintendent and their Cabinet, created a "Family Engagement Survey" that was sent to all PSD parents in fall 2018. This timing coincided with the Student Connection Survey, from which results were included in the DE 1.0 Internal Monitoring Report and in EL 2.1 Monitoring Report in spring 2019. The new survey gave PSD more actionable data to be able to measure our effectiveness and ability to deliver on the District Ends – particularly the Ends regarding "Connections."

PSD's "Operating Principles" are in place, as of the 2020-21 school year, which is evidence of PSD meeting the expectation of EL 2.1.14. However, there is work underway to update them to reflect who we are today. PSD staff members presented the "Principles of Community" project at an April 23, 2019 board meeting and also included their development as part of the spring 2021 presentation of the District Unified Improvement Plan. Although a version of the "Principles of Community" exist, the Language, Culture and Equity and Communications departments collaborated and identified a need to garner further stakeholder input and refine the principles so they are more action-oriented. Work will continue on this important project in the 2021-22 school year, as one part of the District's overall plan for equity, diversity and inclusion.

For the reasons listed above, the District did meet the expectation of EL 2.1.14.