



Internal Monitoring Report

June 11, 2024

Policy Title: Treatment of Students, Parents/Guardians & General Public

Policy Type: Executive Limitation

Policy No.: EL 2.1

Period Monitored: July 2023-June 2024

This report monitors the Board of Education's Executive Limitations Policy for the 2023-2024 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.

Brian Kingsley

June 11, 2024

Superintendent of Schools

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 2023-2024 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

- 2024-25 District Calendar
- 2024-25 District Budget Development

2023-24 Specific Changes

- Revision of District Policy IKF (Graduation Requirements)
 - Curriculum Adoptions in Math, Science, Literacy, and Social Studies
 - School Bell Schedules
 - 2023-24 Community Engagement Sessions
 - Facilities Planning Steering Committee and Long-Range Planning Engagement Sessions and Surveys
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 2024 for the 2024-25 school year 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.
 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 90.5% of parents/students reviewed and signed the receipt of Student Rights and Code of Conduct this school year.

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 thousands of activity reservations by outside organizations in typical school years.

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 28.3% of parents choose a school for their child other than their neighborhood school with no appeals made during the 2023-24 school year. Additionally, as of the 2023 October Count, 2,601 students attended option schools. October Count data 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).
8. *District assessment 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/Acadience, Teaching Strategies GOLD, CogAT, NWEA MAP (alternate PROGRESS), and PSAT/SAT, along with trainings for coordinators at each site to ensure compliance with CDE-mandated timelines and procedures.
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, phone calls, and emails sent to or forwarded to Communications employees or sent to the public email address info@psdschools.org, within a timely manner when a response is warranted. The Communications Department, other departments and schools responded collectively to thousands of parent, community member, student, media, and staff questions and feedback shared during the 2023-24 school year.

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 Chief Human Resources Officer. No substantiated acts of retaliation occurred in the 2023-24 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 90.5% of parents/students signed as having acknowledged and received in the 2023-24 school year. The Code of Conduct is shared digitally and is 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/their 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. District staff hosted several in-person community engagement meetings during the 2023-24 school year on September 21, October 17, November 2 (Integrated Services specific), November 7 (Integrated Services specific), November 13 (Integrated Services specific), November 15, November 30 (Budget specific), and December 13 (Budget specific). The superintendent hosted several informal Chats with the Superintendent with staff following school visits and departments throughout the 2023-24 school year. Plus, the superintendent hosted several Community Chats at the Museum of Discovery throughout the 2023-24 school year. In partnership with the Facilities Planning Steering Committee, the district hosted long-range planning specific community engagement sessions on March 20 (two sessions), March 25 (two sessions), March 27, March 28, April 4 (in Spanish), and April 15 (in Arabic). In partnership with district staff, the PSD Board of Education hosted community engagement sessions specific to long-range planning on April 16 and June 4.
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.

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 has conducted this survey each year, including in the 2023-24 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 2023-24 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. **2024-25 District calendar** - The Calendar Committee convenes to discuss options for and changes to the District’s calendars.

The Calendar Committee used 2023 community survey feedback to develop the 2024-25 school year calendar that was presented to and approved by the PSD Board of Education in fall 2023.

The committee has communicated its intent to administer the survey every two years as part of a cycle of regular feedback to guide long-term calendar planning efforts. Based on that timeline, the next anticipated community calendar survey will be administered in 2025.

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 gathering input from 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.

The PSD Budget Development Team (BDT) is comprised of representatives from district schools, departments and the employee associations. Work by the BDT has been focused on further aligning PSD's financial resources with district priorities, academic goals and the forthcoming district strategic plan.

Information regarding budget development was communicated through the PSD Budget Design Team, 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 2024-25 fiscal year budget.

Specific Changes (2023-24)

- **Revision of District Policy IKF (Graduation Requirements):** During the 2023-24 school year, the District presented proposed revisions to the graduation requirements policy, District Policy IKF. These proposed revisions were intended to ensure that students have more flexibility as they complete their graduation requirements and also better serves our students with disabilities and our multilingual learners as they complete graduation requirements. The revisions to the policy were presented to the Board in two readings in the spring of 2024. In addition to these two readings, substantial community engagement opportunities were provided to staff, families, students, and the community at large. Feedback on proposed changes was sought from the Student Advisory Committee, the District Advisory Board, the District Accountability Committee, Work-Based Learning Coordinators, Industry partners, Chamber of Commerce staff, secondary principals and assistant principals, Counselors, Curriculum and Instruction Facilitators, District curriculum teams, Language, Culture and Equity Staff, Integrated Services staff, Student Services staff, and the Learning Services Team. Additionally public engagement sessions, open to all members of the community were held to gather feedback on proposed revisions. All of the

feedback collected through these various community engagement opportunities informed the final recommendation brought to and adopted by the Board of Education this spring.

- **Curriculum Adoptions in Math, Science, Literacy, and Social Studies:** At the May 14 Board of Education meeting, the Board was asked to approve instructional materials adoptions for Middle School Science, Middle School U.S. History (8th Grade), High School World History (Genocides and Holocaust), Discrete Mathematics, Data Analysis and Probability, and 9th and 10th grade English Language Arts. Several public feedback opportunities were offered in association with these adoptions. Each adoption committee included a cross-representation of roles in our community from staff to parents/families to students and community members. More information about the adoption processes for each of these curricula is available on the [2023-24 Instructional Materials Adoptions page](#) of the PSD website.
- **School Bell Schedules:** To optimize the efficiency of PSD's transportation routing system, save funds, and improve working conditions of transportation staff, as well as reduce costs spent on bussing for student activities while increasing transportation opportunities for the district, staff proposed modifying our bell times to allow the district to run a three-tiered system of busing. To make this change, bell times at many PSD schools needed to be shifted. Public input was sought through a survey regarding bell time options and through several presentations to groups including the District Advisory Board, the District Accountability Committee, the Poudre Education Association ARs, among others. This input informed the final recommendation made to the Board of Education regarding shifts to bell times, which was approved in March 2024 for implementation in the fall of 2024. At the time, the Board also charged staff with further exploring standardizations and associated efficiencies in bell times for implementation in future years. Public input will be sought on these options as they are developed as well.
- **2023-24 Community Engagement Sessions:** District staff hosted several in-person community engagement meetings during the 2023-24 school year. General sessions on district priorities as outlined in the strategic plan (i.e. literacy, mental health, and graduation with options) and on long-range planning were held on September 21, October 17, and November 15. Sessions specifically dedicated to discussing Integrated Services were held on November 2, November 7, and November 13. Sessions specific to Finance and the district's budget were held on November 30 and December 13. District staff also partnered with the Facilities Planning Steering committee to host long-range planning specific community engagement sessions on March 20 (two sessions), March 25 (two sessions), March 27, March 28, April 4 (in Spanish), and April 15 (in Arabic). In partnership with district staff, the PSD Board of Education hosted community engagement sessions specific to long-range planning on April 16 and June 4. The superintendent hosted several informal Chats with the Superintendent with staff following school visits and departments throughout the 2023-24 school year. And, the superintendent hosted several Community Chats at the Museum of Discovery throughout the 2023-24 school year.

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.

- 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 platforms
- Targeted emails to principals, administrators, parents, key community communicators, PSD staff and all students in grades 6-12 (a new email audience addition, as of the 2020-21 school year)
- Requests that principals share information with site teams, PTA/PTOs/SACs, volunteer coordinators, staff, all families
- Updates to the District Advisory Board as deemed appropriate by the Superintendent/Assistant Superintendents
- 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 the district-wide newsletter PSD Now sent every other week
- Updates for staff via four editions of the staff newsletter (sent quarterly)
- 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). As part of its continuous evaluation process, IT will review the OLR system and data collected as needed going forward.

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, 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 students' 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 2023-24 school year, 90.5% 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. The Code of Conduct is made available to our community digitally on the PSD website.

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.

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 program that supports students who have been expelled. All expelled students and their parents are notified of this opportunity via a written letter.

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 allowing 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: I

The PSD Customer Support Center works with community members and groups to schedule thousands of facility rentals. Between July 1, 2023-June 1, 2024, for example, there were 42,597 activity reservations of PSD facilities, including reservations made by schools. As a historical reminder, PSD did not rent its facilities to outside groups in the 2020-21 school year due to COVID restrictions.

In a post-pandemic environment, 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, 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 District website; print and digital fliers; Spotify ads; and the PSD website and social media platforms. The District Communications Department also collaborated with other staff to produce social media toolkits for schools to advertise School Choice, pitched coverage to media, and more. The District

also communicated with staff about the change in school choice policy that allows them to enroll their child in any neighborhood school they choose without submitting a school choice application.

As of the 2023 October Count, 28.3% of K-12 students attended a school other than their neighborhood school (percent does not include charter schools). Also, as of the 2023 October Count, 2,601 students (does not include charter schools because this number references PSD choice-only schools) attended option schools (Harris, Kinard, PSD Global Academy, Polaris, Traut, Poudre Community Academy (transition students not included), Centennial High School and PSD Options).

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 2023-24.

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/media 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
- PSD social media platforms (Twitter, Facebook, Instagram, YouTube)
- PSD Schools Directory
- Kindergarten and online school registration information
- High School Planning Guide
- New PSD at a Glance 4-page brochure
- PSD Kindergarten Guide (18 pages)
- Parent emails through the PSD Now district and community newsletter (sent every other week during the school year)
- PSD staff quarterly newsletter
- 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, Child Nutrition, Early Childhood, etc.)
- Channel 10/PSDTV/PSD YouTube

Other forms of communication include:

- The District sent dozens of email/voicemail updates to staff and families throughout the 2023-24 school year (in English, Spanish and Arabic) related to major topics including but not limited to: long-range planning; changes to bell times; hiring announcements; superintendent messages, school emergencies (secure status, etc.) and more.
- Communication with non-English-speaking families: The District office and schools have access to Spanish and Arabic interpreters/trained family liaisons who can answer questions and assist families. 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. Live closed captioning in Spanish is also now available on the District's YouTube channel for Board of Education meetings.

- 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.
- 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).
- The Communications Department continued to support superintendent communications to staff and the community, helping to produce multiple videos and written messages throughout the 2023-24 school year.

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, district staff members conduct on-site visits and offers personal support during testing windows. Staff also follow 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 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. Grading practices are being reviewed as part of the district's comprehensive commitment to continued improvement.

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, in partnership with the PSD Board of Education, and other staff 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 and/or their designees 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:

As part of a new practice in the 2021-22 school year, staff and Board of Education directors collaborated to send responses to all individuals who spoke during the community comment portion of PSD Board of Education meetings. The intent in doing so was to, first and foremost, thank people for sharing their time and input, as well as to respond to questions or concerns, and to provide factual information in response to information shared in an individual's comments. This practice continued in the 2022-23 and 2023-24 school years.

During the 2023-2024 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) strived to provide 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 2023-24 school year. Topics ranged from school-specific inquiries, to questions about School of Choice and curriculum, and much more.

Staff continuously collaborate on and review their collective efforts to respond to parents/guardians, staff, students, community members, partners and more, with an eye toward continuous improvement.

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 Assistant Superintendents and Chief Human Resources Officer, 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.

Additionally, Poudre School District believes in ensuring all people - students, parents and staff - are honored in our schools and workplaces. It is important that people report their concerns or what they or a friend or colleague have experienced. Striving toward inclusive excellence takes all of us.

To support our commitment, PSD has three ways to report the things that negatively impact the student and staff experience in our district. The ["See Something, Say Something" web page](#) and suite of reporting resources is available on the PSD website. This web page, along with life-saving information about the 988 crisis lifeline, is made available on the PSD's website and social media platforms, and elsewhere.

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 2023-24 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. During the 2023-24 school year, staff and the Board of Education followed up via email with those who spoke at community comment during PSD Board of Education meetings.

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.

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 Board of Education is aware that staff have replaced the previous Operating Principles with the “Principles of Community.” Work on these principles is everlasting in order to foster a climate and culture surrounding them.

Evidence:

PSD’s “Principles of Community” are in place, which is evidence of PSD meeting the expectation of EL 2.1.14. Our values need to be clear to all members of our PSD community and serve as a foundation for the work we do every day to support each student and one another. Continuing to make these explicit and bringing them to life in our public school system will be important to our collective success in the future.

The District is also in the process of developing an Equity Decision-making Framework, which will further articulate and support the District's operational values. As this tool is developed, updated information will be shared with the Board, staff, and the public.

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