

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

<p>Charter Actions Requiring a Vote</p> <ul style="list-style-type: none"><input type="checkbox"/> Approve a Charter Application<input type="checkbox"/> Approve a Charter Renewal (15 yrs.)<input type="checkbox"/> Approve Charter Continuance (5 or 10 yrs.)<input type="checkbox"/> Approve a Charter Amendment Request<input type="checkbox"/> Approve a Charter Agreement<input type="checkbox"/> Give a Charter Notice of Concern<input type="checkbox"/> Lift the Charter Notice of Concern<input type="checkbox"/> Commence Charter Revocation Proceedings<input type="checkbox"/> Revoke a Charter<input type="checkbox"/> Board Action, Other_____	<p>Non-Voting Board Items</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> Public Hearing Item<input type="checkbox"/> Discussion Item<input type="checkbox"/> Read into Record
<p>Policies</p> <ul style="list-style-type: none"><input type="checkbox"/> Open a New Policy or Changes to a Policy for Public Comment<input type="checkbox"/> Approve a New Policy<input type="checkbox"/> Approve Revisions to an Existing Policy	

PREPARED BY: Rashida Young—Director, Equity and Fidelity Team

SUBJECT: School Transparency Policy

DATE: February 25, 2019

The following proposal was opened for public comment on December 17, 2018 and a public hearing was held on January 28, 2019. The DC Public Charter School Board (DC PCSB) received public comment from 15 individuals (via in person testimony and/ or email), and representatives from the Parent and Alumni Leadership Council (PALC), EmpowerEd, and TenSquare. Additionally, DC PCSB staff held two School Leader Task Force meetings prior to and after the policy was open for public comment. DC PCSB staff revised the policy in response to public comment received and re-opened the revised policy for public comment on February 8. DC PCSB will hold a second public hearing on February 25, at which point the extended public comment period will end. The vote on the final policy is scheduled for March 18, 2019. All public comment received is included in [Attachment C](#).

Proposal

DC PCSB staff recommends its Board hold a second public hearing on the revised School Transparency Policy.

Summary of Policy

This School Transparency Policy (Attachment B) describes the documents DC PCSB will require schools to post on their websites beginning in school year (SY) 2019-20 and the process for doing so. Below is the list of required website documents outlined in the policy. Revisions made since the January 28 public hearing are shown in red text. Attachment C shows all public comment and either how DC PCSB incorporated the recommendation or the rationale for not incorporating the recommendation.

Required Website Documents (which schools must post)

- Charter school board of trustees meeting calendar, **including a notation of which meetings are open to the public in full or in part**
- **Approved board meeting minutes**
- High school course offerings and graduation requirements
- School calendar
- Student/ family handbook, **which must include the school's:**
 - **discipline policy,**
 - **attendance policy,**
 - **grievance procedures, and**
 - **open meetings policy**
- **Employee handbook (which must include a whistleblower policy)**
- **School budgets**
- **Form 990s (non-profit tax filings)**
- **Current salaries of the five most highly-compensated individuals in the organization, if over \$100,000**
- **Description of at-risk funding plans**
- Annual report
- **Contact information for the following school staff:**
 - Title IX coordinator,
 - **McKinney-Vento Homeless Coordinator,**
 - **Special Education point of contact**
- Lottery procedures (schools not participating in My School DC)
- Student application (schools not participating in My School DC)
- Student enrollment form(s)
- **Names of all school board members, and contact information for, at minimum, the Chair and Vice Chair (a general email address, e.g. Board@LEA.org is acceptable)**

In response to public comment, revisions to the proposed policy require each school to have and to post their own policy concerning open board meetings, stating that:

“While DC PCSB does not prescribe a particular open meetings policy, schools will be required to develop a policy pertaining to board meeting accessibility. This policy shall include the number of open meetings the school plans to hold per year.”

Also in response to public comment, revisions to the proposed policy state that, for school budgets,

“DC PCSB will work with schools, OSSE, and other stakeholders to develop a common chart of accounts that will be required for budget submissions beginning with the 2020-21 school year.”

The policy now also notes that DC PCSB will maintain a “Transparency Hub” on its website that will centralize various information including: links to schools’ Required Website Documents, school-specific data, sector-wide information, links to data collected by other government agencies (e.g. OSSE), and information about DC PCSB’s own finances and operations.

Further, the policy outlines consequences for late submission to DC PCSB of website links, non-submission of website links, failure to fix broken links, and failure to notify DC PCSB of updated website content. Consequences could include an Early Warning, Out of Compliance Notice, or Notice of Concern.

Background

We believe families should have access to all the information they need to be informed and active in their student’s education. To that end, the purpose of this policy is to improve accessibility of information for DC public charter school families and other stakeholders. We have historically posted school documents on our website. However, we believe that this is not the most effective way to communicate with families for three reasons: 1) at times content changes, making the content on DC PCSB’s website out of date; 2) parents are more likely to visit a school’s website for school-specific information than to visit DC PCSB’s website; and 3) many schools already post these documents on their websites. Therefore, we will require local education agencies to post these documents on their websites beginning in SY 2019-20.

DC PCSB has long made certain information we collect, such as school board meeting minutes and school employee handbooks available to the public via Freedom of Information Act requests. In response to public comment this information is now included in information posted for public viewing.

DC PCSB staff first informed schools of this initiative during the September 25, 2018 Charter School Leaders Meeting. Staff then held two school leader task force meetings, one on November 9 and one on February 5. We also solicited feedback from the Parent Alumni Leadership Council on January 15.

DC PCSB also informed school leaders at the February 5 meeting that, in response to public comment, it intends to propose modifying the Procurement Contract Submission and Conflict of Interest policy to require submission of actual contracts for amounts in excess of \$25,000. This will be the subject of a public hearing at the board's March 2019 meeting.

Attachments

- Attachment A: School Transparency Policy (revised and redlined to show changes since the last public hearing)
- Attachment B: School Transparency Policy (revised clean)
- Attachment C (Separate): Public Comment Chart (public testimony, public comments, task force and PALC meeting notes)

Attachment A—revised and redlined to show changes since Version 1

POLICY TITLE: DRAFT School Transparency Policy	
ADOPTION/EFFECTIVE DATE:	MOST RECENTLY UPDATED: February 8, 2019

PURPOSE

The purpose of this policy is to improve accessibility of information for DC public charter school families and other stakeholders by a) increasing the amount of school information publicly available, and b) requiring that schools post this information on their own websites. ~~The DC Public Charter School Board (DC PCSB) has historically posted several school documents on its own website.¹ In addition to these existing documents and data, DC PCSB commits to including more information in the future and organizing the information to be easily accessible. However, not all stakeholders intuitively come to DC PCSB's website when searching for school-specific information and, when schools make material changes to documents mid-year, the posted version on DC PCSB's website becomes outdated. DC PCSB seeks to provide the public with more accurate information on public charter schools and, to this end, will require that schools publicly post certain documents to their own websites. The goal is that school policies and procedures will be easily accessible to parents and other stakeholders. Further, schools will be able to make corrections to documents on their websites as needed, whereas before outdated information remained on documents posted to DC PCSB's website.~~

POLICY

Beginning in school year 2019-20, schools will be required to post the following documents publicly on their websites (Required Website Documents):

1. Charter school board of trustees meeting calendar, including a notation of which meetings are open to the public, in full or in part
2. Approved board meeting minutes
3. High school course offerings and graduation requirements
4. School calendar
5. Student/Family handbook (which must include the school's discipline policy, attendance policy, grievance procedures, and open meetings policy²)
6. Employee handbook (which must include a whistleblower policy)

¹ Schools currently submit documents to Epicenter based on what is listed on DC PCSB's Annual Compliance Calendar.

² While DC PCSB does not prescribe a particular open meetings policy, schools will be required to develop a policy pertaining to board meeting accessibility. This policy shall include the number of open meetings the school plans to hold per year. DC PCSB will work with school leaders and other stakeholders to develop a best practice guide for schools.

7. School budgets³
8. Form 990s (non-profit tax filings)
9. Current salaries of the five most highly-compensated individuals in the organization, if over \$100,000
10. Description of at-risk funding plans
11. Annual report
12. Title IX coordinator contact information -Contact information for the following school staff: Title IX coordinator, McKinney-Vento Homeless coordinator; Special Education point of contact;
13. Lottery procedures (schools not participating in My School DC)
14. Student application (schools not participating in My School DC)
15. Student enrollment form(s)
16. Names of all school board members, and contact information for, at minimum, the Chair and Vice Chair (a general email address, e.g. Board@LEA.org, is acceptable)

For more information on the requirements for each of these items, please refer to the following Guidance Document: <https://dcpcsb.egnyte.com/dl/ivUI5qasH2>

DC PCSB will maintain on its website a "Transparency Hub" that will centralize the following information for each school:

- Links to the Required Website Documents;
- Additional school-specific data collected or produced by DC PCSB, such as charter agreements and amendments, financial audits, School Quality Reports, Qualitative Site Review reports, charter review and renewal reports, Financial Audit Review reports, and student location maps; and
- Links to certain data collected from or produced about the school by other governmental sources, including OSSE and the U.S. Department of Education.

The Transparency Hub will also contain sector-wide information, as well as information about DC PCSB's own finances and operations.

If DC PCSB anticipates updates to ~~information collected from schools the list of Required Website Documents, the list of items required to be posted~~ schools will ~~post on their websites as well as what DC PCSB posts on our websites, annually;~~ staff will commit to holding a meeting with school leaders to solicit feedback. Any final updates to the list will be shared with schools no later than June of each year.

Process: To be compliant with the School Transparency Policy, schools must first submit each Required Website dDocument ~~listed above~~ to DC PCSB for review by the submission due date on DC PCSB's Annual Compliance Calendar. Each document must be submitted via Epicenter (or other DC PCSB system that is being used for document collection as specified by DC PCSB).

³ DC PCSB will work with schools, OSSE, and other stakeholders to develop a common chart of accounts that will be required for budget submissions beginning with the 2020-21 school year.

Additionally, the school must publicly post each Required Website Document and submit the website links for each item from this policy publicly posted on its website to DC PCSB by the website posting date listed on the Compliance Calendar.

(If the document has not been approved by DC PCSB by the website posting date listed, the school may post the document to its website with "Draft" clearly indicated or may wait until the document is approved by DC PCSB.)

The school is responsible for maintaining its website with accurate, up-to-date content, compliant with applicable law. DC PCSB staff will check these links periodically, and if at any time a link is broken, or the document is found to no longer be posted, the school will be notified and required to remedy the issue within ten business days. If the school wishes to make a material change to a publicly posted document after it has already been approved by DC PCSB, the school must notify DC PCSB via the Notifications email address (notification@dcpcsb.org)⁴ within ten business days of making the change. -If the material change is found to be in violation of applicable law or of the school's Charter Agreement, DC PCSB will notify the school that the change is not approved.

DC PCSB may offer schools the option of having their websites point to a webpage maintained by DC PCSB containing all of the Required Website Documents.

Consequences for Late Submission of Website Links, Non-Submission of Website Links, Failure to Fix Broken Website Links, Failure to Keep Content Posted, or Material Changes to Content That Violate Applicable Law or the Charter Agreement.

Early Warning⁵

An Early Warning is an email sent to the head of school and Epicenter submitter by DC PCSB staff and is clearly labeled "early warning." The Early Warning will provide a deadline for submitting the required website link, fixing the broken link, reposting a mandatory item that was removed from the website, or updating content before an Out of Compliance notice is issued.

Out of Compliance Notice

An Out of Compliance notice is an email specifically labeled "Out of Compliance" sent by DC PCSB's executive director, deputy director, directors, or senior managers to the head of school and Epicenter submitter for failure to take

⁴ The Notifications email address is used as the mechanism for schools to provide notifications to DC PCSB staff per DC PCSB's [Mandatory School Notification Policy](#). Note that a school may not change its graduation requirements without amending its charter agreement. Updates to any school document that violate applicable law, or the terms of a school's charter agreement, will not be accepted and may result in an Out of Compliance Notice.

⁵ This is the first notice for non-compliance

required action within the timeframe provided in an Early Warning email. The Out of Compliance notice will provide a deadline for submitting the website link, fixing the broken link, reposting a mandatory item that was removed from the website, or updating content before a Notice of Concern is considered.

Notice of Concern

If a school fails to take required action within the timeframe provided in an Out of Compliance notice, the DC PCSB Board may vote to issue a Notice of Concern. Notices of Concern are taken into consideration during each school's five- and ten-year charter reviews and during the charter renewal process, as well as when evaluating enrollment ceiling increase requests. The Notice of Concern will provide a timeframe for curing the issue before further Board action is considered.

Board Approval Acknowledged By:

Rick Cruz
DC PCSB Board Chair

Attachment B—revised clean version

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Rick Cruz
DC PCSB Board Chair

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