DC
PUBLIC
CHARTER
SCHOOL
BOARD

POLICY TITLE: Data and Document Submission and Verification Policy	
ADOPTION/EFFECTIVE DATE: • AOIS Information Technology: September 30, 2011 • Attendance and Discipline Data Policy: May 1, 2012 • Updating the Language and Terms Used in Data Collection: November 19. 2012 • Data Management Policy: September 21, 2015 • December 19, 2016	MOST RECENTLY UPDATED/ merged: July 23, 2018

PURPOSE

This policy establishes data submission standards for DC public charter schools.

The School Reform Act of 1995, D.C. Code §§ 38-1802.01 *et seq*. (SRA), requires the DC Public Charter School Board (DC PCSB) to monitor the progress of each public charter school in meeting the goals and student academic achievement expectations specified in the charter granted to each school, adherence to health and safety regulations, and compliance with applicable law.

In order to conduct such monitoring, DC PCSB collects data and documents including but not limited to: compliance, finance, attendance, discipline, academics, enrollment, procurements, community complaints, school contact information, and school responses to specific inquiries. This information is collected electronically via various data collection systems[1] as well as through email communication. DC PCSB also requires schools to validate various academic and nonacademic data throughout the year to ensure accurate reporting of school data.

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[1] DC PCSB data collection systems as of May 2018 include Epicenter, the Hub, and Egnyte; others may be added or removed as needed.

POLICY

DC PCSB collects data and documents from public charter schools and uses the information to monitor performance and comply with legal reporting requirements. DC PCSB provides technological training to charter school staff annually and on an as-needed basis throughout the school year. DC PCSB also provides schools with instructions for submitting data, a calendar of submission dates, and a list of data elements and their definitions annually. If additional data elements are required, or there are changes to the format or definition of a data element, DC PCSB will give public charter schools at least 30 ~~days~~calendar days' notice. Each year by August 1, DC PCSB updates the data submission calendar to reflect changes due to holidays.

DC PCSB provides timely and meaningful help to schools that encounter technical difficulties entering data into any of the established data systems and/or fixing data errors. If a school experiences technical difficulties that are because of a data system, has notified DC PCSB prior to the submission deadline, and has an active "ticket" in the associated support system, the school will be given additional days (on a case by case basis) to load the data after the error is fixed.

Expectations for Timely Submission

Enrollment Data

Within five business days of a student enrolling in a school, the school must enter all demographic data and a corresponding entry code into the school's established Student Information System (SIS). Likewise, within five business days of a student withdrawing from a school, the school must update the student record with the correct exit code. If a student is placed at a non-public school[2]; is identified as needing an IEP; exits from needing special education services; is identified as an English Learner (EL); or if there is any other change in the student's status, the school must update the student record in the school's SIS and/or related Office of the Superintendent of Education (OSSE) data system(s).

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[2] It is the responsibility of the LEA to ensure that its SIS is capable of transferring timely and accurate data relating to students in nonpublic placements.

Attendance Data

Present, tardy, and absent (excused and unexcused) attendance status must be maintained each day for every student enrolled in the school for the current school year in accordance with DC law.[3] By SY 2020-21, DC PCSB will require that schools distinguish between full and partial day attendance when reporting present and absent attendance statuses.[4] These files must be uploaded into the school's SIS each week. Then, for any given month that students are enrolled in a school, attendance data must be submitted to DC PCSB's established data system by five business days after the start of the next month.

Discipline Data

Discipline data must be submitted 14 calendar days after the end of the that month. The school must enter or upload every out-of-school suspension, involuntary dismissal, and expulsion into DC PCSB's data system using the required template (available in the Hub).[5]

Data Submission and Validation

Schools are required to submit and validate data throughout the year, including but not limited to data pertaining to the Performance Management Framework (PMF)). Financial Analysis Review, Annual Reports, OSSE reports, and Council reports. There are submission and validation windows for underlying student data as well as a school's overall rate. Data are considered validated when the school and DC PCSB agree upon the same rate and calculation for a given metric. Data that are changed during the validation process for a given report must also be changed in the school's SIS, when applicable. DC PCSB will provide submission and validation windows. Schools will be expected to submit and validate data within those timeframes.

Compliance Documents

Schools must submit compliance documents into Epicenter, the Hub, or other DC PCSB established database(s) for compliance document collection on the date listed on the ComplianceLEA Document Submission Calendar. DC PCSB publishes a calendar of submission dates annually, prior to the beginning of the

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[3] Per DCMR Section 5-A2199 (http://dcrules.elaws.us/dcmr/5-a2199), a student must be physically in attendance for at least 80% of the full instructional day in order to be considered present.
[4] DC PCSB may consider a waiver if a school demonstrates significant barriers to implementation.
[5] See DC PCSB's discipline submission template for definitions of out-of-school suspension, involuntary dismissal, and expulsion.

school year. Schools have up to two weeks to revise and resubmit any documents that are rejected.[6] ~~Types of compliance documents that will be required include, but are not limited to, school Annual Reports, monthly financial statements, board meeting minutes, student handbooks, and Certificates of Occupancy. All items on the Compliance~~All items on the LEA Document Submission Calendar are included in DC PCSB's Annual Compliance Review report, which is distributed to schools midyear. Documents due after the Compliance Review cycle must also be submitted on time (or the school may be subject to the consequences outlined below).

School Contact Information

Schools must submit school contact information into the Hub annually, including but not limited to: Board of Trustees members, Executive Director, Data Manager, Special Education Coordinator, and Community Complaints Staff Member. When personnel in these positions change, schools must update the Hub within five business days of the effective date of departure.[7] Schools must confirm accuracy of Contact Information quarterly.

Site Reviews

Schools must submit all items from the required documentation list to the link provided by DC PCSB four weeks before the start of the two-week observation window. Required documents may include but are not limited to: daily/master schedule, teacher roster, school calendar, SPED questionnaire, SPED teacher schedule, EL ~~questionnarire~~questionnaire, and EL teacher schedule.

Charter Renewal

Every 15 years a school is required by law to submit an application to DC PCSB to renew its charter for another 15-year term. DC PCSB requests that schools submit renewal applications in the fall of their 15th year in operation to allow adequate time for the charter renewal process.

Charter Goals

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[6] "Rejected" documents are those that are returned to the submitter with instructions for revisions. Schools may request time beyond two weeks; DC PCSB staff may grant extensions on a case by case basis.

[7] Pursuant to DC PCSB's Mandatory School Notifications Policy, schools must also notify DC PCSB via email within five business days of receiving written notice of the departure of these key personnel.

Annually, schools that have unique charter goals will submit their goals data and validate the aggregated rates in DC PCSB's data system. DC PCSB will provide the templates for data submission and the dates for the submission and validation windows.

Community Complaints

Per DC PCSB's Community Complaints Policy, within five business days of receiving notice that a complaint was submitted to DC PCSB, schools must respond to our staff via email or phone acknowledging receipt of the complaint and provide information regarding the steps the school has taken to address the concern.

Procurement Contracts

Per DC PCSB's Procurement Contract Submission and Conflict of Interest Policy, schools are required to submit documentation to show that contracts were properly bid. In instances when schools are not required to bid a contract, they must still submit documents to show they have followed the proper legal process (e.g., sole source contracts). Schools must confirm accuracy of Contract Submission information quarterly.

Required Website Document Verification

The LEA Document Submission Calendar will list the Required Website Documents per DC PCSB's School Transparency Policy.[8] Schools have two options to comply with the School Transparency Policy: 1) they may post the Required Website Documents on their own websites, or 2) they may post a link on their websites that redirects to the school's individual profile page on DC PCSB's website, where the received documents will be posted by DC PCSB.[9] Schools must annually notify DC PCSB of how they plan to comply by submitting a form to DC PCSB; the form will be included annually on the LEA Document Submission Calendar.

Schools posting Required Website Documents directly to their own websites must:

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[8] DC PCSB's School Transparency Policy: https://www.dcpcsb.org/sites/default/files/report/2019-03-18%20School%20Transparency%20Policy_Redacted_0.pdf
[9] All Required Website Documents will be posted on each school's profile on DC PCSB's website (www.dcpcsb.org).

- Display the Required Website Documents in a single location accessible by one click from the school's homepage;
- Post each documents in alignment with the dates specified in DC PCSB's Website Content Calendar;
- Ensure posted content matches what was received by DC PCSB and correct any contradictory content within 30 calendar days;[10]
- Post the version of the Required Website Documents for the most current school year, with the exception of school budgets, which should align with the current fiscal year; approved board meeting minutes, which should include all minutes from at least two years prior to the current school year; current salaries of the five most highly-compensated individuals from the most recently completed fiscal year; and the most recently available Form 990;
- Maintain accurate and active links throughout the school year; and
- Resubmit to DC PCSB any documents that have undergone material changes since the received document was reviewed by DC PCSB during the LEA Document Submission Calendar deadline.[11]

Schools linking to Required Website Documents posted on DC PCSB's website must:
- Prominently display a link to DC PCSB's page containing the Required Website Documents on the school's homepage, in accordance with DC PCSB's specifications (this link will be sent to schools annually by DC PCSB);
- Ensure that the link remains prominent, visible, and active;
- Submit to DC PCSB all Required Website Documents in accordance with the LEA Document Submission Calendar; and
- Resubmit to DC PCSB any Required Website Documents that are no longer up-to-date, are no longer compliant with applicable law, and/or have undergone material changes since the received document was

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[10] A Required Website Document that is also a compliance document may not contain content that was rejected by DC PCSB. For any such document, the school must update its website to contain the revised and resubmitted document within 10 business days of final submission to DC PCSB. For such documents, schools have the option of either a) posting the unapproved document to the school's website as early as the school wishes and then updating such posting after DC PCSB's review or b) waiting until the document has been received by DC PCSB before posting.

[11] Material changes are limited to those changes made to any of the required components listed in the LEA Document Submission Calendar.

Other Requested Data

Per the School Reform Act, DC PCSB may request any book, record, paper, or document at any time as necessary for our oversight purposes. This policy applies to any ad hoc request for data or documents not otherwise captured above.

Consequences for Late Submission[12]

Early Warning

An Early Warning is an email sent to the head of school by DC PCSB staff and is clearly labeled "early warning." (This does not include communications between DC PCSB staff and school leadership that do not contain the header "early warning.") A school may receive an Early Warning for failure to submit requested data or documents within the timeframe prescribed, including failure to validate DC PCSB or OSSE data within the timeframe allotted (e.g., for the PMF, Council Reports, or the State Report Card). Schools may also receive an Early Warning for repeatedly submitting data or documents that are incorrect, incomplete, or do not conform to the prescribed template or format (in instances where technical support has been provided). The Early Warning

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[12] The Procurement Contract Policy outlines more specific consequences for non-compliance of procurement documents, found here: http://www.dcpcsb.org/sites/default/files/report/2018-04-23%20Procurement%20Contract%20Submission%20Policy%20Revised.pdf

will provide a deadline for submitting the required data or documents before an Out of Compliance notice is issued.

<u>Out of Compliance Notice</u>
An Out of Compliance notice is an email specifically labeled "Out of Compliance" sent by DC PCSB's executive director, deputy director, or senior managers to the head of school, for failure to submit requested data or documents within the timeframe provided in an Early Warning email. Schools may also receive this communication after receiving at least three Early Warning emails in the same school year[13]. The Out of Compliance notice will provide a deadline for submitting the required data or documents before a Notice of Concern is considered.

In instances where a school requests a change to data for which the data validation window has already closed, it may receive an Out of Compliance notice (e.g., requesting a change to student-level enrollment data after the close of OSSE data validation). This also might result in data being published incorrectly.

<u>Notice of Concern</u>
If a school receives two Out of Compliance notices within a school year or fails to cure non-compliant documents within the timeframe provided, 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 for enrollment ceiling increase requests. The Notice of Concern will provide a timeframe for curing the issue before further Board action is considered. Schools issued a Notice of Concern for violation of this policy will be subject to increased monitoring around timely data and document submission. DC PCSB staff will monitor school submissions, ensuring that no less than 100% of submissions are on time in the three months following the Notice of Concern. After three months of timely submissions and validations, DC PCSB staff may recommend that the Board lift the Notice of Concern.

Beginning in school year 2018-19, if a school receives a Compliance Review Report that classifies at least 60% of submissions, inclusive of data validations,

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[13] For purposes of this policy, a school year will be defined as the time from August 1 to July 31.

as late, DC PCSB staff may recommend that the Board issue a Notice of Concern. Uncured Notices of Concern may lead to further Board action.

Expectations for Accurate Data in DC PCSB and OSSE Data Systems

All data entered into DC PCSB's data system by a school should be complete and accurate, to the best of the school's ability, 30 calendar days from the end of the month in which it was submitted. Once this 30-day window has closed, the student-level attendance and discipline data will be considered accurate and DC PCSB staff may produce reports for internal analyses or when legally obligated by external agencies (e.g., DC Council, task forces).

However, DC PCSB will continue to have validation windows to ensure business rules were applied consistently and calculations were done accurately for reports that will be made public. In these cases, DC PCSB staff will (1) share with each school the rates that were calculated, (2) provide schools with at least two business days to review the calculations and make any necessary revisions in the DC PCSB data management system, and (3) re-calculate the rates, if necessary, prior to producing a public report.

Schools must also reconcile any errors or discrepancies uncovered by DC PCSB or OSSE data reports.

Failure of schools to maintain *current, complete,* and *accurate* attendance and discipline data in a DC PCSB or OSSE data management system will increase the likelihood that the school will undergo a data audit or receive a Notice of Concern (based on the outcome of the audit).

Updating Language and Terms in Data Collection

Changes to DC PCSB's oversight processes may result in DC PCSB adding, upgrading, and removing data systems as technologies improve and as DC PCSB's data needs change. For any DC PCSB policy that names a specific data system, the terms of this policy will remain binding even if the data systems change, unless revisions are made to the policy and approved by the DC PCSB Board. Such revisions must be approved by DC PCSB's Board in a public forum, and after a public hearing and public comment period.

Board Approval Acknowledged By:

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Rick Cruz
DC PCSB Board Chair

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