

POLICY TITLE: Data and Document Submission and Verification Policy	
ADOPTION/EFFECTIVE DATE: <ul style="list-style-type: none"> • 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 • July 23, 2018 • September 16, 2019 	MOST RECENTLY UPDATED/ merged: June 26, 2023

PURPOSE

This policy establishes data and document 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, goals, academics, enrollment, procurements, governance, community complaints, school contact information, and school responses to specific inquiries. This information is

collected electronically via various data collection systems¹ as well as through email communication. DC PCSB also requires schools to validate various academic and non-academic data throughout the year to ensure accurate reporting.

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 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 calendar days' notice. Each year by August 1, DC PCSB updates the data submission calendar to reflect changes due to holidays and submission changes. Additionally, each year by June 1, DC PCSB publishes a Local Education Agency (LEA) Submission Calendar to inform LEAs what documents will be required to be submitted during the upcoming school year.

DC PCSB will aim to provide 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.²

This policy outlines DC PCSB's expectations for timely and accurate submission of required data and documents, as well as the consequences for untimely or inaccurate submissions. The examples of submission types in this policy are not exhaustive.

¹ DC PCSB data collection systems as of March 2023 include Epicenter, the Hub, and Egnyte; others may be added or removed as needed without revising this policy. DC PCSB may establish data-sharing partnerships with individual publishers and may utilize an Application Programming Interface (API) to receive data from schools or publishers.

² DC PCSB staff will update affected LEAs on system-wide issues and will not penalize LEAs for errors DC PCSB determines are generated by DC PCSB system errors.

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,³ is identified as needing an Individualized Education Program (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).

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. Schools must also 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 OSSE's data system daily.⁵ DC PCSB receives attendance data directly from OSSE.

Any discrepancies between DC PCSB's attendance records and an LEA's SIS should be resolved through OSSE's data system(s).⁶ Schools are expected to comply with OSSE's applicable data validation Policies.⁷ Schools wishing to update certified data must submit a certified data appeal through their OSSE liaison, unless otherwise notified by OSSE. Schools wishing to submit a certified data appeal to OSSE after five business days of the certification deadline must include a Data Management Correction Action Plan. Schools requesting to update certified data with OSSE may receive an Out of Compliance Notice.

³ It is the responsibility of the LEA to ensure that its SIS is capable of transferring timely and accurate data relating to students in non-public placements.

⁴ Full and partial day attendance distinctions do not apply to adult schools.

⁵ Schools must follow OSSE's guidelines for submitting attendance records for synchronous and asynchronous learners.

⁶ The DC PCSB database(s) will follow OSSE's rosters and may, on a case-by-case basis, update the DC PCSB database for data provided to OSSE.

⁷ Please refer to OSSE's website for this information here: <https://bit.ly/3In0iBm>

Discipline Data

Discipline data must be submitted directly to OSSE's data system by the 10th of every month and certified according to the certification dates outlined in OSSE's Data Validation Policy. The school must enter the required data for all disciplinary incidents into OSSE's data system according to OSSE's discipline guidance, including but not limited to out of school suspension, expulsion, and involuntary dismissal(s). Schools will have a monthly submission task in the Hub that should be completed only when a data file comprehensive of all disciplinary incidents for the month.

Any discrepancies between DC PCSB's discipline records and an LEA's SIS and any Unified Data Errors indicating a conflict within data submitted to OSSE should be resolved through OSSE's data system(s). Schools wishing to update data must follow OSSE's applicable policies for data submission and validation.

Data and Document Submission and Validation

Schools are required to submit and validate data throughout the year, including but not limited to data pertaining to DC PCSB's accountability framework, assessment data, audit engagement letters, interim financial statements, year-end audited financial statements, enrollment projections, budgets, at-risk reports, Financial Analysis Report measures and observations, 990 forms, Annual Reports, leases, 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, and the submitted documents and data are accurate and complete. 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. Uploaded files may be posted on DC PCSB's website (e.g., audited financial statements, budgets, at-risk reports, 990s, FAR data, etc.).

For non-certified data, LEAs will not be penalized for incorrect data in DC PCSB's systems if the data quality issues arise due to OSSE's errors or non-responsiveness. In such instances, LEAs should first request OSSE to resolve the data quality issues prior to contacting DC PCSB. If OSSE declines to update the

data, the LEA should then reach out to DC PCSB with appropriate documentation to support their data update request. We may require additional documentation to corroborate the LEA's data update request, such as official score reports from the publisher or additional assessment records in DC PCSB's prescribed format.

Compliance Documents

Schools must submit compliance items into Epicenter, the Hub, or other DC PCSB established database(s) for compliance document collection on or before the date listed on the LEA Submission Calendar.⁸

- DC PCSB publishes a calendar of submission dates annually, prior to the beginning of the school year. Unless otherwise directed by DC PCSB, schools have up to two weeks to revise and resubmit any documents that are rejected.
- Documents due after the fall Compliance Review cycle must also be submitted on time.

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, Finance 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.⁹ Schools must update each subscription list in the Hub annually, and they must confirm the accuracy of Contact, Subscription, and Distribution Information both quarterly and at the beginning of each school year.

Site Visits

For Qualitative Site Reviews (QSRs), schools must submit all items from the required documentation list to the Egnyte link provided by DC PCSB two weeks before the start of a school's QSR observation window. Schools are required to

⁸ LEAs can find the Annual Compliance and Reporting page and calendar at <https://dcpcsb.org/annual-compliance-reporting>.

⁹ 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. The full policy is available here: <https://dcpcsb.org/mandatory-school-notification-policy>.

submit all documents using the templates provided by DC PCSB. Required documents may include but are not limited to: daily/master schedule, teacher roster, school calendar, special education questionnaire, special education teacher schedule, Emerging Multilingual Learner (EML) questionnaire, EML teacher schedule, assignment review cover pages, and student work samples.

Outside of QSRs, DC PCSB staff may conduct other site visits including but not limited to: special education (SPED) site support visits; SPED audits; EML site support visits; unscheduled visits in response to urgent community complaints, consistent with the [Community Complaint Policy](#); and residential program visits.¹⁰ In these cases, schools may be asked to submit information such as class schedules, school staff contact information, and school policies, among other forms of documentation, and must provide such information in accordance with the deadline imposed by DC PCSB.

Pre-Opening Site Visits

New LEAs, or existing LEAs relocating or opening a new campus or facility, are subject to a pre-opening site visit. DC PCSB staff will conduct a pre-opening site visit at least two weeks prior to the start of the school year. The school must meet all safety and compliance requirements found in the most current version of the Pre-Opening Site Visit Checklist to operate at the proposed facility. This checklist will be shared with the school in advance of the site visit.

LEAs must submit documentation to prove these requirements have been met. DC PCSB verifies this documentation prior to completing a walk-through and will provide the LEA a final report summarizing the findings of the site visit.

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.

¹⁰ Site visits may occur as part of DC PCSB's routine oversight or as a result of specific concerns. Instances where a site visit may occur are detailed in separate policies, including the escalation of interventions leading up to a potential site visit where relevant (e.g., Special Education Audit Policy, Community Complaint Policy, etc.). Site visits conducted by DC PCSB staff shall not unreasonably interfere with the school's operation.

Charter Goals

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. DC PCSB may require schools to identify which assessments they administer.

Community Complaints

Per DC PCSB's Community Complaint Policy¹¹, 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 it. For complaints regarding access to student learning or the health and safety of students and staff (e.g., issues with access to virtual learning, allegations of corporal punishment, sexual misconduct or abuse), the school must respond to the complainant within one business day and respond to DC PCSB within two business days.

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 at the close of each fiscal year and in their year-end audited financial statements, as listed annually in the LEA Submission Calendar

Financial Documentation

As part of DC PCSB's financial oversight, schools are required to submit routine financial documentation, including but not limited to audit engagement letters, audited financial statements, interim unaudited financial statements, IRS Form 990 tax forms, and enrollment budgets and projections. The list of required submissions and deadlines for those submissions, including the deadline for marking them as complete after they have been processed, are published on DC PCSB's website through the LEA Submission Calendar and are updated by

¹¹ The Community Complaint Policy can be found here: <https://dcpcsb.org/community-complaint-policy>.

August 1 each year. Schools should not mark submissions complete until the information is accurately reflected in the database. Schools are encouraged to complete all submissions before their due dates to allow time for correcting and resubmitting documents, as needed. DC PCSB may grant extensions on a case-by-case basis.

DC PCSB may impose additional submission requirements for, and make additional information requests of, certain LEAs in connection with any of our financial oversight work (e.g., reviews, renewals, financial corrective action plans, FAR validations and observations, etc.). LEAs must fully respond to these requests within five business days unless otherwise stated in the initial request from DC PCSB. If an LEA anticipates it will not be able to fully respond within the requested time, the LEA must respond to the request within two business days with both an explanation for the delay and date when they expect to fully respond; DC PCSB may grant extensions on a case-by-case basis.

DC PCSB may require schools to submit revised budgets to reflect the pre-audited enrollment when the pre-audited enrollment is more than ten percent less than the originally budgeted enrollment for that school. Such revised budgets must be submitted within four weeks of the request and shall include all budget worksheets in the current budget template provided by DC PCSB.

Schools must submit to DC PCSB copies of their real property leases and amendments within 30 calendar days of their execution.

Incomplete or inaccurate submissions may be rejected by DC PCSB.¹² DC PCSB will notify the LEA of the reason(s) for the rejection and requirements for submitting revisions, including a deadline for resubmission, usually within two business days.

¹² Incomplete or inaccurate submissions include, but are not limited to, schools intentionally submitting inaccurate data to complete a deadline (e.g., not following the file processor template, submitting data that is not related to the submission task, or the intentional submission or omission of data to meet a deadline).

Required Website Document Verification

The LEA Document Submission Calendar will list the Required Website Documents per DC PCSB's School Transparency Policy.¹³ 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.¹⁴ 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:

- Display the Required Website Documents in a single location accessible by one click from the school's homepage;
- Post each document in alignment with the dates specified in DC PCSB's Website Content Calendar;¹⁵
- Ensure posted content matches what was received by DC PCSB and correct any contradictory content within 30 calendar days;¹⁶
- 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

¹³ The School Transparency Policy is available here: <https://dcpcsb.org/school-transparency-policy>

¹⁴ All Required Website Documents will be posted on each school's profile on DC PCSB's website: www.dcpcsb.org.

¹⁵ DC PCSB will release a Website Content Calendar by August 30 of each school year. DC PCSB compliance review and communications staff will work together and with school staff to ensure documents are properly reviewed and posted by the deadlines set forth in the Website Content Calendar. DC PCSB staff will work with schools as needed to create adjusted deadlines for posting should extenuating circumstances occur.

¹⁶ A Required Website Document that is also a compliance document may be posted to a school's website prior to DC PCSB review and receipt, but must be updated in the event that revisions are requested through the compliance review process. Once the requested modifications have been made and the document has been re-reviewed and received by DC PCSB, the school must update its website to reflect the modified version of the document within 30 calendar days of receipt by DC PCSB. Schools also have the option of waiting until the document has been reviewed and received by DC PCSB before posting, but this would mean that documents are posted later in the school year.

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 Submission Calendar deadline.¹⁷

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 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 reviewed by DC PCSB during the LEA Submission Calendar deadline. DC PCSB will identify the appropriate avenues for submission per outdated document or item.

For either option, DC PCSB staff will check these links to Required Website Documents periodically. The school will be notified of the corresponding consequence outlined in the School Transparency Policy if DC PCSB determines:

- A document cannot be accessed;
- Required Website Documents do not match what was verified by DC PCSB (see LEA Submission Calendar for required components);
- Content is not posted; and/or
- Material changes have been made to content that violate applicable law or the Charter Agreement.

¹⁷ 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 we determine necessary for our oversight purposes.¹⁸ This policy applies to any ad hoc request for data or documents not otherwise captured above.

¹⁸ D.C. Code § 38-1802.11(a)(2).

Consequences for Late, Inaccurate, or Non-Compliant Submission¹⁹

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 DC PCSB’s accountability framework, Council Reports, or the State Report Card). Schools may also receive an Early Warning for repeatedly submitting data or documents that are materially incorrect, incomplete, or do not conform to the prescribed template, format, or method of submission (in instances where technical support has been provided). The Early Warning will provide a deadline for submitting the required data or documents 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 staff 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 an Out of Compliance notice for failure to correct data or documents that are incorrect, incomplete, or do not conform to the prescribed template, format, or method of submission within the timeframe provided in an Early Warning email. If a school receives two Early Warning Notices in a year, any subsequent Early Warning Notice(s) will automatically become an Out of Compliance Notice.²⁰ 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

¹⁹ The Procurement Contract Policy outlines more specific consequences for non-compliance of procurement documents, found here: <https://dcpcsb.org/procurement-contract-submission-policy>.

²⁰ For purposes of this policy, a school year will be defined as the time from August 1 to July 31.

close of OSSE data validation). This also might result in data being published incorrectly.

Notice of Concern

If a school receives two Out of Compliance notices within a school year, upon the third Out of Compliance notice, the DC PCSB Board may vote to issue it as a Notice of Concern instead. If a school fails to cure non-compliant documents within the timeframe provided by an Out of Compliance Notice, the DC PCSB Board may vote to issue a Notice of Concern. Additionally, if a school receives a Compliance Review Report that classifies at least 60% of submissions, inclusive of data validations, as late, the 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 and expansion 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.

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 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 five

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* data in a DC PCSB or OSSE data management system will increase the likelihood that the school will undergo a data audit²¹ or receive a Notice of Concern (based on the outcome of the audit). Any instance in which a school is found to have knowingly submitted falsified, manipulated, or misrepresented data, including instances in which data is falsely reported as not available, will automatically result in an Out of Compliance Notice, and may result in further Board action.

Schools must comply with DC PCSB guidelines and instructions when submitting data to DC PCSB or resolving data issues, including instructions regarding the use of secure methods to submit Personally Identifiable Information, as defined under the Family Educational Rights and Privacy Act (FERPA),²² or otherwise sensitive, protected, or confidential information. Repeated failure to submit data in accordance with DC PCSB instructions will result in consequences as outlined in this policy.

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. In the event that a specific data system used by DC PCSB changes but this policy is not revised, DC PCSB will provide schools with supplemental guidance and instructions regarding the new data system.

²¹ DC PCSB's Data Audit Policy is available here: <https://dcpccb.org/data-audit-policy>

²² 20 U.S.C. § 1232g; 34 CFR Part 99



Board Approval Acknowledged By:

Sean M. Cussey

DC PCSB Board Chair

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