

2021 Board Policy Manual

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SECTION 1 – BOARD GOVERNANCE – BOARD GOVERNANCE

Role of the Governing Board

Mission Statement

- The Compass Charter Schools mission is to inspire and develop innovative, creative, self-directed learners, one scholar at a time.

Vision Statement

- The Compass Charter Schools vision is to create a collaborative virtual learning community, inspiring scholars to appreciate the ways in which arts and sciences nurture a curiosity for life-long learning, and prepare scholars to take responsibility for their future success.

Duties of the Board Members

- Duty of Care: Each member of the Board must perform their duties in good faith, in a manner that is in the best interests of the Corporation and with such care, including reasonable inquiry, as an ordinarily prudent person in a like position would use under similar circumstances.
- Duty of Loyalty: Board members will have undivided allegiance to the welfare of Compass Charter Schools and not act in their own self-interest. The Board will adopt and follow a Conflict of Interest Code. Each member of the Board will ensure the Corporation's compliance with state and federal laws.
- Duty of Obedience: Board members will ensure that the mission of the Compass Charter Schools is carried out by being faithful to the purposes and goals of the Corporation.
- The Board shall comply with the Ralph M. Brown Act ("Brown Act"), Education Code Section 47604.1, Government Code Section 1090, *et seq*., the Political Reform Act, and the Public Records Act.
- The Board will participate annually in training regarding board governance, the Brown Act, and conflicts of interest rules.

Vision and Strategic Plan

- The Board drafts, modifies and approves the Compass Charter Schools Mission and reviews the Mission annually.
- The Board reviews, provides input and approves Strategic Plans submitted by the Superintendent & CEO.
- The Board adopts policies to successfully implement the Compass Charter Schools Mission and Strategic Plans.
- The Board oversees the Superintendent & CEO to ensure that the Compass Charter Schools Mission and Strategic Plans are reflected in the day-to-day operations of the Corporation, including ensuring that the curriculum aligns with the Charter Schools Mission.
- The Board will establish and from time-to-time review organizational values.
- The Board shall from time-to-time review and update the Bylaws.

Academic Performance Monitoring

- The Board, or a committee thereof, annually reviews scholar performance based on state-mandated assessments and sets goals for scholar academic achievement at each Charter School.
- The Board, or a committee thereof, periodically reviews scholar performance based on charter school assessments and sets goals for scholar academic achievement at each Charter School.
- The Board reviews and adopts academic policies to achieve the scholar achievement goals at each Charter School.
- The Board approves all academic performance reports to all federal, state, and local agencies as required by law.
- The Board approves a Local Control Accountability Plan ("LCAP") for each Charter School and annually reviews, updates, and approves it.
- The Board, or a committee thereof, researches or develops scholar data collection systems and periodically reviews them to ensure their effectiveness.

Staffing and Personnel

- The Board reviews and approves personnel policies and any amendments thereto.
- The Board hires, evaluates, disciplines, and terminates the employment of the Superintendent & CEO.
- The Board establishes performance goals for the Superintendent & CEO and communicates the goals to the Superintendent & CEO.
- The Board annually reviews the Superintendent & CEO's performance based on a shared matrix of goals.
- The Board annually reviews/evaluates the Superintendent & CEO's employment contract each Spring.
- The Board establishes and annually reviews the Superintendent & CEO succession and recruitment plans.
- The Board approves the salaries and compensation policies for all Compass Charter Schools personnel in compliance with any applicable state laws and collective bargaining procedures (if applicable).

Parent, Scholar and Community Relations

- The Board, or an administrative panel selected by the Board, hears scholar suspension, expulsion, or involuntary removal matters.
- The Board, following the suspension, expulsion, or involuntary removal hearing or following the Administrative Panel's recommendation, makes the final decision regarding suspension, expulsion, or involuntary removal of scholars.
- The Board reviews and approves scholar and parent policies and any proposed amendments thereto.
- As needed, the Board determines the best approach to communicating with the media and community at large on specific items, consistent with the Compass Charter Schools' Mission.

Finance and Budget

- The Board reviews and approves the fiscal management and internal controls policies and any proposed amendments thereto.
- The Board approves Compass Charter Schools contracts over $100,000.
- The Board approves all affirmative litigation involving Compass Charter Schools.

- The Board will review and approve any authority given to legal counsel for any settlements regarding potential or actual litigation over $100,000.
- The Board shall review all expenditures via approval of a check register which lists all checks written during a set period of time and includes check number, payee, date, and amount.
- The Board reviews and approves the Compass Charter Schools' annual academic calendars and class schedules.
- The Board will appoint an audit committee that will solicit and select the Compass Charter Schools independent financial auditor, oversee the auditor's work, and receive the auditor's report(s).
- The Board reviews, adopts, and amends the annual budget for Compass Charter Schools with revenue being recognized in each individual Charter School and expenses being consolidated in Compass Charter Schools, then distributed to each individual Charter School based on ADA.
- The Board reviews, adopts, and amends the interim and annual financial statements.
- The Board will ensure the ending fund balances for each individual Charter School will include a reserve of no less than ten percent (10%).
- The Board, subsequent to receiving a recommendation from an audit committee, reviews and approves the audit report.
- The Board monitors the responses to the audit report and implementation thereof.

Facilities

- The Board enters into financing, leasing, and building contracts.
- The Board approves construction and remodeling of facilities.
- The Board, or a committee thereof, researches school sites as needed, and funding and facilities options.
- The Board, or a committee thereof, makes recommendations on facilities needs and policies.

Board Internal Business

- The Board drafts, reviews and approves board policies and amendments thereto.
- The Board and the Superintendent & CEO recruit and nominate prospective Board members.
- The Board orients and assures proper training for new Board members.
- The Board develops and implements a Board self-evaluation every other year. From time to time, the Board re-evaluates its self-evaluation process.

Charter Performance and Renewal

- The Board annually reviews the school performance reports.
- The Board, as needed, reviews charter school renewal proposals and reports.
- The Board approves Charter Renewal Petitions to be submitted to any chartering authority.

Delegation of Power to the Superintendent & CEO

The Board delegates the following powers to the Superintendent & CEO, or his/her designee:

Vision and Strategic Plan

- The Superintendent & CEO provides input to the Board when it drafts, modifies and approves the Compass Charter Schools Mission and in each subsequent year when it

reevaluates the Mission.

- The Superintendent & CEO drafts and submits to the Board the Compass Charter Schools Strategic Plans.
- The Superintendent & CEO implements the Board-adopted policies, the Compass Charter Schools Mission, and Strategic Plans, by among other things adopting appropriate procedures and training staff on the policies and procedures.

Academic Performance Monitoring

- The Superintendent & CEO creates a report reflecting scholar performance based on state-mandated assessments, provides a copy to the Board, reviews the performance with the Board, or a committee thereof, and provides input to the Board when setting goals for scholar achievement on assessments. The Superintendent & CEO implements the goals for scholar achievement on such assessments.
- The Superintendent & CEO quarterly creates a report reflecting scholar performance based on school level assessments, provides a copy to the Board, reviews the performance with the Board, or a committee thereof, and provides input to the Board when setting goals for scholar assessment. The Superintendent & CEO implements the goals for scholar achievement based on assessments.
- The Superintendent & CEO implements Board adopted policies to achieve the scholar achievement goals, by among other things, adopting appropriate procedures and training staff on policies and procedures.
- The Superintendent & CEO creates all academic performance reports required by all state and local agencies as required by law and provides them to the Board for approval.
- The Superintendent & CEO consults with teachers, principals, administrators, other school personnel, parents, and pupils in developing the LCAP and annual update to the LCAP, which is approved by the Board annually.
- The Superintendent & CEO develops the Compass Charter Schools calendar and class schedule and provides them to the Board for approval.

Staffing and Personnel

- The Superintendent & CEO drafts all personnel policies and presents them to the Board for review and approval. The Superintendent & CEO also recommends any proposed amendments to the personnel policies and presents them to the Board for review and approval.
- The Superintendent & CEO is responsible for recruiting, hiring, evaluating, disciplining, and dismissing all Compass Charter Schools personnel.
- The Superintendent & CEO recommends the salaries for all Compass Charter Schools personnel in compliance with any applicable state laws and collective bargaining procedures (if applicable) to the Board for final approval.
- The Superintendent & CEO ensures that all Compass Charter Schools personnel are evaluated on a yearly basis and creates the process for such evaluation with input from administrators.
- The Superintendent & CEO implements all personnel policies, including the Compass Charter Schools internal complaint procedures.

Parent, Scholar and Community Relations

- The Superintendent & CEO implements the policies and procedures adopted for scholar suspension, expulsion, or involuntary removal, and recommends scholar suspensions, expulsions, or voluntary removals to the Board or Administrative Panel, upon completion

of the school-level procedures.

- The Superintendent & CEO follows the policies and procedures adopted for scholar suspensions, expulsions, or involuntary removals.
- The Superintendent & CEO drafts, and subsequently implements the Board adopted scholar and parent policies, by, among other things, adopting appropriate procedures and training staff on the policies and procedures. The Superintendent & CEO drafts amendments to the scholar and parent policies, and presents them to the Board for approval.
- The Superintendent & CEO communicates with the media and community at large in a fashion that is consistent with the School's Mission.

Finance and Budget

- The Superintendent & CEO drafts and subsequently implements the Board-adopted fiscal policies, by, among other things, adopting appropriate procedures and training staff on the policies and procedures. The Superintendent & CEO drafts amendments to the fiscal policies, and presents them to the Board for approval.
- The Superintendent & CEO approves all Compass Charter Schools contracts greater than $25,000 up to $100,000.
- The Superintendent & CEO approves authority given to legal counsel for any settlements regarding potential or actual litigation up to $100,000.
- The Superintendent & CEO drafts and submits to the Board, or a committee thereof, the quarterly and yearly budget drafts.
- The Superintendent & CEO drafts and submits to the Board the final quarterly and yearly budgets and other required financial statements.
- The Superintendent & CEO implements the responses to the audit report as instructed by the Board.
- The Superintendent & CEO must follow Compass Charter Schools purchasing procedures, including:
    - □ All purchases over $50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services;
    - □ Documentation will be attached to all check and purchase order requests showing that at least three (3) vendors were contacted and such documentation shall be maintained for three (3) years.

Facilities

- The Superintendent & CEO conducts needs assessments for each school site at the direction of the Board.
- The Superintendent & CEO conducts capital campaigns as needed.
- The Superintendent & CEO implements any facilities policies adopted by the Board.

Charter Performance and Renewal

- The Superintendent & CEO annually drafts any required Compass Charter Schools performance reports for Board review.
- The Superintendent & CEO is responsible for the drafting of charter renewal petitions and material revisions of the charters.
- The Superintendent & CEO will foster an amicable relationship between the individual Charter Schools and their chartering authority.

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SECTION 2 - BOARD GOVERNANCE – SCHOOL BOARD MEETINGS – BROWN ACT COMPLIANCE

All meetings of the Board of Directors ("Board") of Compass Charter Schools ("CCS" or the "Charter School") and its committees shall be called, noticed, and held in compliance with the provisions of the Ralph M. Brown Act (Chapter 9 (commencing with Section 54950) of Part 1 of Division 2 of Title 5 of the Government Code) as said chapter may be modified by subsequent legislation ("Brown Act").

Types of Meetings

Regular Meetings

Regular meetings of the Board of Directors of Compass Charter Schools shall be held consistent with the calendar for such meetings as established by the Board each year.

If at any time any regular meeting falls on a holiday (Federal, State or local), such regular meeting shall be held on the next business day or as noticed.

Special Meetings

The Chair of the Board or a majority of the members of the Board may call special meetings on an as-needed basis, consistent with the requirements of the Brown Act.

Notification of Meetings

Regular Meetings

No later than 72 hours prior to a regular meeting, the Charter School shall post an agenda containing a brief general description of each item of business to be transacted or discussed at the meeting. The agenda will be posted in a location that is freely accessible to members of the public, and on the School's website. If the Board elects to use teleconferencing, the Charter School shall post agendas at all teleconference locations and conduct teleconference meetings in a manner that protects the statutory and constitutional rights of the parties or the public appearing before the Board. Each teleconference location shall be identified in the notice and agenda of the meeting or proceeding, and each teleconference location shall be accessible to the public. The agenda and agenda packet will be provided to all Board members and to all persons that have requested a copy of the agenda and/or the agenda packet in compliance with the Brown Act. It is the Superintendent & CEO's, or designee's, responsibility to distribute copies of the agenda and the agenda packet for regular meetings.

Special Meetings

No later than 24 hours prior to a special meeting the Charter School shall post an agenda containing a brief general description of each item of business to be transacted or discussed at the meeting.

The agenda will be posted in a location that is freely accessible to members of the public, and on the School's website, not later than 24 hours prior to a special meeting. If the Board elects to use teleconferencing, the Charter School shall post agendas at all teleconference locations and conduct teleconference meetings in a manner that protects the statutory and constitutional rights

of the parties or the public appearing before the Board. Each teleconference location shall be identified in the notice and agenda of the meeting or proceeding, and each teleconference location shall be accessible to the public. The agenda and agenda packet will be provided to all Board members and to all persons that have requested a copy of the agenda and/or the agenda packet in compliance with the Brown Act. It is the Superintendent & CEO's, or designee's, responsibility to distribute copies of the agenda and the agenda packet for special meetings.

Emergency Meetings

In the case of an emergency situation, as defined by the Brown Act, involving matters upon which prompt action is necessary due to the disruption or threatened disruption of public facilities, notice to the Board will be provided as soon as is reasonably practicable under the circumstances. All media outlets that have requested notice of special meetings shall be notified one hour prior to the emergency meeting, or in the case of a dire emergency, at or near the time that the Board members are notified of the emergency meeting. The notice shall be given by telephone and all telephone numbers provided by the media outlet in the request for notice shall be exhausted. If telephones services are not functioning, the notice requirement is waived and the media shall be notified of the fact of the holding of the emergency meeting, the purpose of the meeting and any action taken at the meeting as soon after the meeting as possible.

Request for Notice

Any person who has requested a copy of the agenda and/or agenda packet in writing, will be mailed a copy of the requested materials at the time the agenda and/or agenda packet is posted or upon distribution to all, or a majority of all, of the members of the Board, whichever occurs first.

Agendas

Preparation of Agenda and Process

The Superintendent & CEO of Compass Charter Schools ("CCS") shall be responsible for preparing the agendas for all meetings of the Board.

The Superintendent & CEO shall include items on the agenda that are requested by Board members and that relate to school business. In addition, a member of the public may request that a topic directly related to school business be placed on the agenda. The Chair of the Board shall determine, in his/her discretion, whether the agenda item requested by a member of the public shall be placed on the agenda.

With the exception of agenda item requests for special and emergency meetings, requests for items to be included on the agenda shall be in writing and submitted to the Superintendent & CEO's office no later than seven (7) business days prior to the next regularly scheduled Board meeting.

Contents of the Agenda

The agenda shall include the following information:

1) Time and location of the meeting, including, if applicable, any teleconferencing location(s);

2) A brief general description of all items of business to be transacted or discussed at the meeting, including those items to be discussed in closed session. Closed session items must be described in accordance with Government Code Section 54954.5;

3) An opportunity for members of the public to directly address the Board in accordance with the Brown Act and the Board's public comment policy (addressed below);

4) If teleconference locations are being utilized, an opportunity for members of the public to address the Board directly at each teleconference location; and

5) Information regarding how, to whom and when a request for disability related modification or accommodation, including auxiliary aids or services, may be made by a person with a disability who requires a modification or accommodation in order to participate in the public meeting.

Supporting Information Relating to Agenda Items

The Superintendent & CEO is responsible for preparing all supporting information that may accompany each agenda topic originating from the administration or the Board.

The purpose of preparing supporting information is to facilitate decision-making on the part of the Board members by having available to them in advance of Board meetings comprehensive information pertaining to each agenda topic. The supporting information shall, to the extent possible, accompany the agenda and be delivered to the Board members concurrently with the agenda.

If supporting materials are distributed to Board members during a public meeting, such materials will be made available for public inspection at the meeting if prepared by the Superintendent & CEO or other school staff. If such materials are prepared by some other person, they shall be made available after the meeting at which they were distributed. CCS may charge a fee or deposit for a copy of such materials pursuant to Government Code Section 6253.

These materials will be made available in appropriate alternative formats upon request by a person with a disability, as required by the Americans with Disabilities Act. No surcharge will be imposed on persons with disabilities in violation of the Americans with Disabilities Act.

Members of the public who request to have a topic placed on the agenda are encouraged to submit, in writing, supporting information detailing their reason for having the topic placed on the agenda and what is being requested of the Board. In the event that the requested topic is placed on the agenda, the supporting information will provide background information for Board members to help expedite the Board's handling of the topic at the Board meeting.

Board Meetings

Open Session

All meetings of the Board shall be open to the public and the media, except that the Board may hold closed sessions as authorized by the Brown Act.

Public Participation at Meetings

Public comment generally: At a regular meeting, any person may address the Board concerning any item on the agenda and any other matters within the Board's subject matter jurisdiction. At a special meeting, any person may address the Board only concerning the items on the agenda. The total time devoted to presentations to the Board on all public comment (including agenda items and non-agenda items at regular meetings) shall not exceed 15 minutes, unless additional time is

granted by the Board. Members of the public may speak for up to two (2) minutes on agenda and/or non-agenda items. At the discretion of the Chair of the Board, the two (2) minute time limit may be extended to three (3) minutes.

Members of the public desiring Board action on an item are encouraged to seek placement of the issue on the Board agenda in accordance with this policy rather than presenting the matter during general public comment. This will facilitate discussion and expedite resolution since the Board cannot discuss items in a meeting that are not on the agenda. This policy is not intended to prevent the public from providing public comment in line with this policy.

Willful interruption of Board meeting: In the event that any meeting is willfully interrupted by a group(s) of persons so as to render the orderly conduct of such meeting unfeasible and order cannot be restored by the removal of individuals who are willfully interrupting the meeting, the Board may order the meeting room cleared and continue the session. Only matters appearing on the agenda may be considered in such a session. Representatives of the press or other media, if not participating in the disturbance, shall be allowed to attend any such session

Time for public comment: All public comment concerning all matters shall be heard prior to the Board's consideration of the agenda items.

Recording and/or broadcasting of meeting: Persons attending an open meeting have the right to record or broadcast the proceedings with an audio or video recorder or a still or motion picture camera unless the Board reasonably finds that the recording or broadcast cannot continue without noise, illumination or obstruction of view that constitutes, or would constitute a persistent disruption of the proceedings.

Requests to address the Board: Prior to the beginning of the meeting, members of the public seeking to address the Board on agenda and/or non-agenda items may complete a "Speaker Request Card" (located in the Board Meeting Room), and give it to the Chair of the Board, Board Secretary, or either of their designees.

Board Members at Meetings

Board discussion and action: No action or discussion shall be taken on any item not appearing on the posted agenda. However, at a regular meeting, Board members or staff may briefly respond to statements made or questions posed by persons during public comment. At regular meetings, a Board member may, on his/her own initiative or in response to a question posed by the public, ask a question for clarification, make a brief announcement or make a brief report on his/her own activities. Additionally, a Board member may provide a reference to staff or other resources for factual information, request staff to report back to the Board at a subsequent meeting concerning any matter, or take action to direct staff to place a matter of business on a future agenda.

Exceptions in regular meetings: In regular meetings, the Board may take action on items of business not appearing on the posted agenda if any of the following conditions apply: 1) A majority of the Board determines that an emergency situation exists as defined by the Brown Act; 2) A determination by a two-thirds vote of the Board members present at the meeting, or if less than two-thirds are present, a unanimous vote of those Board members present, that there is a need to take immediate action and that the need for action came to the attention of the Board after the agenda was posted; or 3) The item was properly posted for a prior meeting occurring

not more than five (5) calendar days prior to the date action is taken on the item, and at the prior meeting, the item was continued to the meeting at which action is being taken. If items are discussed under these conditions, the Chair of the Board shall publicly identify the item(s).

Closed session: Prior to holding any closed session, the Board shall disclose, in open session of the meeting, the basis for holding a closed session pursuant to Government Code Section 54954.5. The disclosure may take the form of a reference to the item(s) as they are listed by number or letter on the agenda. In the closed session, the Board may only consider the disclosed closed session agenda items.

After any closed session, the Board shall reconvene into open session prior to adjournment and make a report of any action taken in closed session and the vote or abstention of every Board member present thereon in accordance with Government Code Section 54957.1.

Minutes of Board Meetings

Open Session: Board meeting minutes shall include the time and place that the meeting was held; whether the meeting was annual, regular, special, or emergency and, if special or emergency, how authorized; the notice given; the names of directors present at the meeting, state all motions made, document the names of Board members making and seconding motions, and state the vote or abstention of each Board member present for each action taken. The minutes pertaining to open session may also record the recommendations of the administration and the general substance of the Board's discussion or the general substance of statements pertinent to Board's business made by members of the staff or public.

Closed Session: Minutes will not be taken during Closed Session.

Minutes for Emergency Meetings: Any time an emergency meeting is held, the minutes must provide a list of persons who were notified or attempted to be notified, a copy of the roll call vote, and any actions taken at the meeting. The minutes will be posted for a minimum of 10 days in a public place as soon after the meeting as possible.

Storing the minutes: The official minutes of the Board shall be kept digitally. The following documents shall be bound with the official minutes and referred to in the text of the minutes to which they apply:

- Original copies of all resolutions unless required by other agencies, in which case photocopies of the originals may be substituted;
- Original copies of all budget transfers;
- Copies of any document determined by the Board to be attached to the official minutes; and
- Other documents which, in the opinion of the Secretary, are necessary to fully substantiate or record Board action.

In addition to the official minutes, an additional copy of all minutes and attached documents shall be maintained at the Central Office. This set of minutes shall be bound, indexed by those categories detailed above and by subject.

Quorum Requirements
A majority of the directors then in office shall constitute a quorum of the Board, which is necessary for the Board to transact business. All motions, in order to pass, need positive action by at least a majority of the directors present at a duly held meeting at which a quorum is present. Should there be less than a majority of the Board present at the inception of any meeting, the meeting shall be adjourned.

Continuances and Adjournment

Continuances
Items appearing on agendas for regular meeting may be continued to another meeting, to be held within five (5) calendar days from the date of the originally posted meeting, without triggering the requirement that the agenda item be re-posted with the requisite notice.

Adjournment
The Board may adjourn any regular or special meeting to a time and place specified in an order of adjournment. Less than a quorum may so adjourn from time to time. If all members are absent from any regular meeting, the Board Secretary may declare the meeting adjourned to a stated time and place and he/she shall cause a written notice of adjournment to be given. A copy of the notice of adjournment shall be conspicuously posted on or near the door of the place where the regular or special meeting was held within 24 hours after the time of adjournment. When a regular meeting is adjourned, the resulting adjourned regular meeting is a regular meeting for all purposes. When an order of adjournment fails to state the hour at which the adjourned meeting is to be held, it shall be held at the hour specified for regular meetings.

Board Policy #: 3
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SECTION 3 - BOARD GOVERNANCE – BOARD OPERATIONS

Roberts Rules of Order
Absent a policy to the contrary and to the extent consistent with the Brown Act, the business of the Board at its meetings will be conducted in accordance with Roberts Rules of Order. Any member may raise a point of order under these rules, which action shall take precedence over all other business before the Board.

Voting by Board of Directors
Voting on resolutions shall be executed through the public voting of Board members. Secret ballots and proxies are prohibited.

Officers, Directors and School Liability Insurance
The Charter School will maintain adequate insurance to cover all risks associated with school activities and operations.

Appointment of Board Committees
Consistent with the charters, Bylaws, and any other applicable provisions of contract or law, the Board may appoint committees for any purpose deemed appropriate by the Board. The resolution establishing the committee shall clearly define the range of the committee's responsibility and authority, and shall specify whether the committee shall be a standing or limited-term committee. In meeting and carrying out designated purposes, any such committee shall comply with any applicable legal or contractual requirements.

Board Appointment/Nomination Process
The Board shall carry out its appointment and nomination process consistent with the requirements of its charters and Bylaws. Should the charters and Bylaws not address any issue which may arise, the Board may adopt policies or regulations which address such concerns. Should the Board wish to alter its appointment or nomination process, it must do so consistent with any requirements of its charters, unless the charters are revised.

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SECTION 4 - BOARD GOVERNANCE - PUBLIC RECORDS REQUESTS – PUBLIC RECORDS ACT COMPLIANCE

Public Records

Public Records Defined

CCS provides the public with access to its public records in accordance with legal requirements. Public records are those writings containing information relating to the conduct of CCS' business that are prepared, owned, used or retained by CCS regardless of physical form or characteristics. Certain public records, however, are exempt from disclosure by express provision of law. These records will not be disclosed to the public. CCS may not deny disclosure of public records based on the purpose for which the record is being requested.

Records Exempt from Disclosure

Public access shall not be given to records listed as exempt from public disclosure in the California Public Records Act or other applicable statutes. Some of the more common exemptions are:

- Preliminary drafts, notes or inter/intra-school memoranda that are not retained by the Charter School in the ordinary course of business, when the public interest in withholding clearly outweighs the public interest in disclosure;
- Records pertaining to pending litigation to which CCS is a party or to claims filed against the CCS, which were created in connection with the litigation or claims and were intended to be confidential, until the pending litigation or claim has been finally adjudicated or otherwise settled.;
- Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy;
- Test questions, scoring keys and other examination data used to administer an examination for employment or academic examination, unless specifically authorized by law.
- The content of real estate appraisals or engineering or feasibility estimates and evaluations made for or by CCS relative to the acquisition of property, until all of the property has been acquired or all of the contract agreement obtained.
- Records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege. This includes scholar records protected from disclosure under the Family Educational Rights and Privacy Act ("FERPA"), a federal statute that protects the privacy interests of parents and scholars with regard to education records;
- A document prepared by or for CCS that assesses its vulnerability to terrorist attack or other criminal acts intended to disrupt CCS operations and that is for distribution or consideration in a closed session.
- Records where, on the facts of the particular case, the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.

CCS may, in its discretion and as permitted by law, waive the applicable exemption to the records. In this case, the disclosure constitutes a waiver for all requestors of that public record and will be open to public inspection.

Process for Requesting Public Records

Requests for Public Records

Any person wishing to inspect CCS' public records shall make the request, preferably in writing, to the**: Superintendent & CEO, CCS, 850 Hampshire Road Suite R, Thousand Oaks, CA 91361.** While a request need not be in writing, if the request is verbal, the requestor will be asked to reduce the request to writing so there is a written record of the records being requested. If the requestor chooses not to reduce the request to writing, the Superintendent & CEO or designee shall reduce the request to writing and confirm the request with the requestor. The request must reasonably describe an identifiable public record(s) and must be specific and focused.

To the extent reasonable under the circumstances, CCS will assist the requestor to make a focused and effective request by:

- Assisting the requestor in identifying records and information that are responsive to the request or to the purpose of the request, if stated.
- Describing the information technology and physical location in which the records exist.
- Providing suggestions for overcoming any practical basis for denying access to the records or information sought.

If CCS is unable to identify the requested information after making a reasonable effort to elicit additional clarifying information from the requestor that will help identify the record(s), CCS will not provide further assistance to the requestor.

Response to Public Records Request

The Superintendent & CEO will, within 10 days of receipt of the request, provide a written response to the requestor of public records. The written response shall contain the following information:

- Notice informing the requestor whether the request, in whole or in part, seeks copies of disclosable public records in the possession of CCS and the reasons for the determination.
- If the Charter School denies any request for records, in whole or in part, and the request was in writing, the notification of denial will set forth the names and titles or positions of each person responsible for the denial.
- The estimated date and time when the records will be made available.
- CCS may charge for copies of public records or other materials requested by individuals or groups. The charge, based on the direct cost of duplication, has been set by the Board of Directs at $0.25 cents per page. The direct cost of duplication includes the pro rata expense of the copying equipment used and the pro rata expense in terms of staff time

required to produce the copy. It does not include the cost of locating, retrieving, or inspecting records.

- If the requestor seeks copies in electronic format, CCS may charge the requestor the direct cost of producing a copy of the record in that format. If, in order to comply with these requirements relating to electronic formatted records described below, CCS is required to produce a copy of an electronic record and the record is one that is produced only at otherwise regularly scheduled intervals or the request would require data compilation, extraction or programming to produce the record, CCS may charge the requestor the cost to construct a record, the cost of programming and computer services necessary to produce the record.

- In unusual circumstances, the Superintendent & CEO may extend the 10-day limit for up to 14 days by providing written notice to the requestor and setting forth the reasons for the extension and the date on which a determination is expected to be made. Unusual circumstances include, but only to the extent reasonably necessary to properly process the request, the following:

  1) The need to search for and collect the requested records from field facilities or other locations that are separate from the office processing the request;
  2) The need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records that are demanded in a single request;
  3) The need for consultation, which shall be conducted with all practicable speed, with another agency having a substantial interest in the determination of the request, or among two or more components of CCS having substantial subject matter interest therein;
  4) The need to compile data, to write programming language or a computer program, or to construct a computer report to extract data.

  If an inspection is requested, any person shall have reasonable access, during normal business hours, to the public records of CCS within the requirements of state law. However, if records are not readily available, or if portions of the records to be inspected must be redacted to protect exempt material, then CCS must be given a reasonable period of time to perform these functions prior to inspection. Such records shall be examined in the presence of the staff member regularly responsible for their maintenance.

Records Inspections or Copies

Time and Place of Inspection: A person who has made a public records request may inspect the records after the date and time identified in the response to the request. Generally, records inspections may take place at **850 Hampshire Road Suite R, Thousand Oaks, CA 91361** during office hours of the Charter School, which are **8:00A.M. to 5:00 P.M**.

Electronic Formatted Records: If CCS has information that constitutes an identifiable public record not exempt from disclosure that is in an electronic format, and it has been requested in an electronic format, CCS will make that information available in an electronic format. CCS will make the information available for inspection in any electronic format in which it holds the information. If the requested format is one that CCS uses to create copies for its own use or for provision to other agencies, CCS will provide a copy of the electronic record. CCS will not,

however, provide electronic records in the electronic form in which it is held by CCS if its release jeopardizes or compromises the security or integrity of the original record or of any proprietary software in which it is maintained.

If CCS no longer has the record in electronic format, CCS will not reconstruct the record in electronic format.

Partial Disclosure: If the requested records are only partially disclosable as a portion of the record is exempt from disclosure, the reasonably segregable disclosable portion of the record(s) will be made available for inspection.

Board Policy #: 5
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 5 – BOARD GOVERNANCE – RETENTON AND MANAGEMENT OF FILES AND RECORDS

Compass Charter Schools recognizes it is important to have procedures regarding retention of files and records, including which records should be kept and which can be destroyed.

Filing System, Record Class, Email, and Other Electronic Records

Unless necessary, records shall be kept by their originator or sender, not by the receiver; this helps avoid duplicate filing systems. Additionally, Compass Charter Schools shall:

- Keep all documentation and records for each year separate from those for other years.
- Label folders and use separate folders for different types of documents (e.g., keep invoices separate from bank reconciliation worksheets, and keep income tax returns separate from cash receipts).

Record Class

Compass Charter Schools shall adhere to the following record classes to optimize filing efficiency, records access, record classifications, and retention periods:

- **Class 1: Permanent Records**. Permanent records shall be kept indefinitely in accordance with statute or other written guidance.
- **Class 2: Optional/Temporary Records**. Optional records are any records worthy of temporary preservation not classified as Class 1, Permanent records.
- **Class 3: Disposable Records.** All records not classified as Class 1: Permanent, or Class 2: Optional/ Temporary, shall be classified as Class 3: Disposable.
- **Email Class Records.** Compass Charter Schools shall retain all email records of the Charter School for a maximum of one fiscal year beginning July 1 and ending June 30 of the year after the email was created. For example, if the email was created in February 2017, during fiscal year 2016-2017, the email would not be deleted until the end of the 2017-2018 fiscal year, or June 30, 2018. All emails older than one fiscal school year after the year the email was created shall be automatically deleted from the Charter School's email system, servers, backup servers, and any other electronic storage system as early as the first day of the subsequent fiscal school year. The subsequent fiscal school year is defined as beginning on July 1.
  Should any email be determined to be retained longer than one fiscal year beyond the date the email was created, the email shall be archived in the email system, or printed and filed.
- **Other Electronic Records**: Other electronic records are electronic records saved on a hard drive, flash drive, or other electronic storage medium of the staff or individual who retains the record in its final form. Any electronic record not classified as Class 1: Permanent or Class 2: Optional/Temporary shall be classified as Class 3: Disposable. Once an electronic record is considered Class 3: Disposable, employees will conduct a reasonable search of all electronic sources of information (computer hard drives, flash drives, servers, compact discs and other electronic media) in their possession and shall delete those electronic records permanently.

Records Retention
Files shall be maintained for as long as necessary but only according to requirements set in the Charter School's records retention policy.

Copies of critical records that are vital to the Charter School's daily operations should be kept off site in case of disaster. This may include information needed to file insurance claims (e.g. asset lists, insurance contacts, policy numbers), financial data for tax purposes (e.g. wages paid, income and expenses), contact lists to inform or restart the business (e.g. vendors, customers, investors and employees), and other data to help rebuild the business (e.g. business plans, intellectual property, or proprietary information).

Destruction of Class 3: Disposable Records
Within three to six months after the end of each school year, all Class 3 records shall be destroyed. All records are to be preserved until they are deemed Class 3 records.

A list of records to be destroyed shall be circulated to all affected individuals for review and comment 30 days prior to destruction. The list of records destroyed shall be maintained permanently.

Destruction of the files or records may be performed by an independent, outside service to prevent reconstruction of the records. Disposal of records into the Charter School's trash shall not be allowed.

Disposal Period
All Class 3: Disposable records shall not be destroyed until after the third July 1 succeeding the completion of the Charter School's annual independent audit required by Education Code or of any other legally required audit, or after the ending date of any retention period required by any agency other than the State of California, whichever date is later. For example, if the June 30, 2015 annual independent audit were completed and issued by December 15, 2015, the third July 1 after completion of the audit would be July 1, 2018.

Unless otherwise specified in policy, all Class 3: Disposable records shall be destroyed during the third school year after the school year in which they originated (e.g., 2014-15 records may be destroyed after July 1, 2018).

When in doubt about when a record should be disposed of or destroyed, nonpermanent records shall not be destroyed until seven years after the end of the fiscal year in which the record was created. For example, if a document was created in February 2016, the end of the fiscal year is June 30, 2016; therefore, the document would not be destroyed until July 1, 2023 or later.

Examples of Class 1, 2 and 3 Records
Class 1: Permanent Records — Do Not Destroy
A. Annual Reports
- Official budget.
- Financial report of all funds.
- Audit of all funds.
- Average daily attendance, including reports for the first and second interim reporting periods (P-1 and P-2).

- Other major annual reports, including: Those containing information about property, activities, financial condition, or transactions.
- Those the governing board has declared permanent.

B. Official Actions

- Minutes of the governing board or committees thereof, including the text of a rule, regulation, policy or resolution not set forth verbatim in the minutes but included therein by reference.
- Records transmitted by another agency that pertain to that agency's action with respect to the Charter School's reorganization.

C. Personnel Records (Employees)

- All employee records related to employment, assignment, amounts and dates of service rendered, termination or dismissal, sick leave, rate of compensation, salaries or wages paid, and deductions or withholdings made and the person or agency to whom such amounts were paid. In lieu of detailed records, a complete and accurate summary payroll record for every employee of the Charter School containing the same data may be classified as Class 1: Permanent, and the detailed records may then be classified as Class 3: Disposable.

D. Pupil Records

- The enrollment and scholarship records for each pupil.
- All records pertaining to any accident or injury involving a minor and for which a claim for damages has been filed as required by law, including any policy of liability insurance relating thereto, except that these records cease to be Class 1: Permanent records one year after the claim has been settled, or sooner if the statute of limitations has run out.
- Any record, file, document, or other material that contains information directly related to a scholar and is maintained by the Charter School is considered a pupil record.

E. Property and Insurance Records

- All detailed records related to land, buildings and equipment. In lieu of such detailed records, a complete property ledger may be classified as Class 1: Permanent, and the detailed records may then be classified as Class 3: Disposable, if the property ledger includes the following:
  - All fixed assets.
  - An equipment inventory.
- For each item of property, the date of acquisition or augmentation, the person from whom acquired, an accurate description or identification, and the amount paid. Comparable information is required if the unit is sold, lost, or otherwise disposed of.
- All insurance records. Insurance policies are contracts and should be retained indefinitely.

F. Historical records.

- Articles of incorporation
- IRS nonprofit determination letter
- Administrative guides
- Annual reports
- School employee directories

- Employee newsletters and handbooks
- Educational objectives, Charter School goals and reaffirmation of loyalty
- Racial and ethnic surveys
- Yearbooks and other school publications
- All unique or old administrative and instructional publications
- All identified or identifiable photos of Charter School people, places and events
- All unique or old documents or publications about the history of the Charter School

Class 2: Optional/Temporary Records
Any record worthy of temporary preservation but not classified as Class 1: Permanent may be classified as Class 2: Optional/Temporary and shall then be retained until reclassified as Class 3: Disposable.

If the Superintendent & CEO or Governing Board decide that classification should not be made, all records of the prior year may be classified as Class 2: Optional/Temporary, pending further review and classification within one year. Optional/Temporary records may include records considered useful for administrative, legal, fiscal or other purposes, and they may remain Optional/Temporary for a period of years.

Examples of Optional/Temporary records include:

A. Gross receipts

Gross receipts show the income received. The Charter School should keep supporting documents that show the amounts and sources of gross receipts, such as the following:

- Cash register tapes (e.g., for scholar store sales)
- Bank deposit slips
- Receipt books
- Invoices
- Credit card charge slips
- Forms 1099-MISC, Miscellaneous Income
- Other cash receipts such as cash count forms and receipt books

B. Inventory

Inventory is a record of any item purchased and resold to customers, even if it is for fundraising. If the Charter School is the manufacturer or producer of an item, the inventory includes the cost of all raw materials or parts purchased for manufacture. Supporting documents should show the amount paid and that the amount was for inventory. Documents that report the cost of inventory include the following:

- Canceled checks
- Cash register tape receipts
- Credit card sales slips and invoices

C. Expenses

Expenses are the costs incurred (other than the cost of inventory) to carry on the Charter School's business. Supporting documents should show the amount paid and that the amount was a business expense. Documents include the following:

- Canceled checks
- Cash register tapes
- Account statements

- Credit card sales slips
- Invoices
- Petty cash slips for small cash payments

D. Travel, transportation, entertainment, and gift expenses

- Specific recordkeeping rules apply to these expenses. For more information, see IRS Publication 463.

E. Employment taxes

- Specific employment tax records must be retained. For a list, see IRS Publication 15.
- Keep employment tax records for at least four years after the date the tax is due or is paid, whichever is later.

F. Assets

Assets are the property the Charter School owns and uses, such as real estate, machinery and furniture. The Charter School shall keep records that verify certain information about its assets.

Asset records should show the following information:

- When and how the asset was acquired
- Purchase price
- Cost of any improvements
- Deductions taken for depreciation
- Deductions taken for casualty losses, such as losses from fires or storms
- How the asset was used
- When and how the asset was disposed of
- Selling price
- Expenses of sale

The following documents may provide this information:

- Purchase and sales invoices
- Real estate closing statements
- Canceled checks

G. Other

- General ledger detail report
- All bank records (e.g., bank statements and bank reconciliations)
- All income tax returns
- All minutes of all charter school meetings

H. Record retention time limits – IRS nonprofit tax return standards

To help nonprofits follow its record retention requirements for documents related to filing nonprofit tax returns, the IRS provides guidance for how long records should be kept. Record retention time limits for income tax returns offer the best guidance because most recordkeeping is to comply with IRS requirements.

1. Records shall be kept for three years if situations 4, 5, and 6 below do not apply to the nonprofit.

2. If the Charter School files a claim for a credit or refund after having filed its return, records shall be kept for three years from the date the original return was filed or two years from the date the tax was paid, whichever is later.
3. If the Charter School files a claim for a loss from worthless securities or a deduction for bad debt, records shall be kept for seven years.
4. If the Charter School does not report income that it should have reported, and that income is more than 25% of its gross income shown on its return, records shall be kept for six years.
5. If the Charter School does not file a return, records shall be kept indefinitely.
6. If the Charter School files a fraudulent return, records shall be kept indefinitely.

Class 3: Disposable Records
All records not classified as Class 1: Permanent or Class 2: Optional/Temporary shall be classified as Class 3: Disposable, including but not limited to the following:

- Records essential to an audit, including those related to attendance, average daily attendance, or business or financial transactions (e.g., purchase orders, invoices, warrants, ledger sheets, canceled checks and stubs, and scholar body and cafeteria fund records), and detailed records used in the preparation of any other report.
- Teachers' registers may be classified as Class 3: Disposable only if all pupil information associated with the teachers' registers is retained in other records or if the pupil record information is removed from the teachers' register and is classified as Class 1: Permanent.
- Periodic reports including daily, weekly, and monthly reports, bulletins and instructions.

Federal Funds
United States Code, Title 20, Section 1232f (a) states:

> Each recipient of federal funds under any applicable program through any grant, subgrant, cooperative agreement, loan, or other arrangement shall keep records which fully disclose the amount and disposition by the recipient, of those funds, the total cost of the activity for which the funds are used, the share of that cost provided from other sources, and other records as will facilitate an effective financial or programmatic audit. The recipient shall maintain such records for three years after the completion of the activities for which the funds are used.

Title 20, Section 1232f (b) states,

> The Secretary and the Comptroller General of the United States, or any of their duly authorized representatives, shall have access, for the purpose of audit examination, to any records maintained by a recipient that may be related, or pertinent to, grants, subgrants, cooperative agreements, loans, or other arrangements to which reference is made in subsection (a) of this section, or which may relate to the compliance of the recipient with any requirement of any applicable program.

Electronic Records
For purposes of this policy, an electronic record is defined as a computer-generated record. This means an email, pdf, Microsoft Excel, Word, or PowerPoint file, JPEG, WAV, or other file created using computer software or hardware and stored in any electronic medium including but not limited to magnetic, tape, disc, or other type of drive device, or cloud-based storage. A paper

printout of an electronic record is not considered an electronic record.

Records Not Subject to Records Retention
The following are not considered records and therefore are not covered by the records retention policy and may be destroyed at any time by any member of the Charter School:

- Preliminary drafts and informal notes that have no further value to the Charter School.
- Personal notes and personal correspondence, including personal email correspondence, even if it is created or sent using a Charter School computer or on the Charter School's premises.
- Personal financial or tax information, or any other information of a purely personal nature, even if those records are kept on the Charter School's premises or on its computers.
- Advertisements, spam or junk email of any kind received by the Charter School or any Charter School employee or computer.
- Library books, magazines, and pamphlets not prepared by or for the Charter School.
- Textbooks, maps used for instruction, and other instructional materials.
- Any other document (paper or electronic, including email) that has nothing to do with the Charter School's business or with its scholars, teachers, management, other employees, or contractors.

Litigation Hold
In the event of a threatened or pending lawsuit, the Charter School may be required by law to retain records, including emails, beyond the established retention period so that they remain subject to legal discovery. Consult legal counsel if such a demand is received, and do not dispose of the records until advised by counsel.

Board Policy #: 6
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 6 - FISCAL – CONTROLS

The Board of Compass Charter Schools has reviewed and adopted the following policies and procedures to ensure the most effective use of the funds of CCS to support the mission and to ensure that the funds are budgeted, accounted for, expended, and maintained appropriately. CCS will develop and monitor its budget in accord with the annual budget development and monitoring calendar as specified below:

January – February

- The Board will work with the Superintendent & CEO, with the assistance of the Charter School's back office services provider, to review the Governor's proposed state budget for the upcoming fiscal year, and identify the likely range of revenues for the school's upcoming fiscal year (July 1-June 30).
- The Superintendent & CEO, with the assistance of the Charter School's back office services provider, reviews/prepares a set of proposed budget development principles for board review and approval.
- Develop rough planning budget for upcoming fiscal year, including projected enrollment and any proposed staffing changes.
- Develop five-year budget projection in accord with the schools' established strategic and growth plans.
- Ongoing monitoring and revision of current year budget.

March – April

- The Superintendent & CEO, working in conjunction with the Charter School's back office services provider, staff, Board members, and the Assistant Superintendent & Chief Financial Officer, prepares a formal budget plan for the upcoming fiscal year. The plan is reviewed by the Board.
- Ongoing monitoring and revision of current year budget.

May – June

- Superintendent & CEO, with the assistance of the Charter School's back office services provider, reviews revenue projections subsequent to the Governor's annual "May Revise" budget figures, fine-tunes the upcoming fiscal year budget to accommodate any changes. This budget will include monthly cash flow projections.
- The Board reviews and formally adopts a budget for the upcoming fiscal year before June 30. A copy of the final budget is provided to the charter-granting agency.
- Ongoing monitoring and revision of current year budget.

July – August

- Books for prior fiscal year are closed, all transactions are posted, and records are assembled for audit.
- Budget is reviewed subsequent to the adoption of the State Budget Act and necessary adjustments are made. A copy of the revised final budget is provided to the charter granting agency.

- Independent auditor performs audit of the just-closed fiscal year and prepares audit report for submission to the Board.

September – December

- At the end of the first full week of school, the Superintendent & CEO, with the assistance of the Charter School's back office services provider, reviews CCS's actual attendance figures and notifies the Board if actual attendance is below budget projections. If needed, the school's budget is again revised to match likely revenues.
- The Board reviews a copy of the audit. The Superintendent & CEO and Finance Committee, with the assistance of the Charter School's back office services provider, address any audit exceptions or adverse findings. Audit report and any follow-up plans are submitted to the charter authorizer and other entities, as required by law.
- The Superintendent & CEO, with the assistance of the Charter School's back office services provider, reviews current year actual versus budgeted revenues and expenditures after the second and fifth months of the school year and reports to the Finance Committee. The Board approves any needed changes to the annual budget.

Controls, Budget, and Fiscal Management: CCS will maintain in effect the following principles in its ongoing fiscal management practices to ensure that, (1) expenditures are authorized by and in accordance with amounts specified in the board-adopted budget, (2) the schools' funds are managed and held in a manner that provides a high degree of protection of the schools' assets, and (3) all transactions are recorded and documented in an appropriate manner.

Segregation of Duties: CCS will develop and maintain simple check request and purchase order forms to document the authorization of all non-payroll expenditures. All proposed expenditures must be approved by the Superintendent & CEO, or his/her designee, who will review the proposed expenditure to determine whether it is consistent with the Board-adopted budget and sign the payment request form. All transactions will be posted in a general ledger. The transactions will be posted on the ledger by the Assistant Superintendent & Chief Financial Officer or his/her assistant at the School site or as outsourced to a Board-approved back office provider or its outside accounting firm. To ensure segregation of recording and authorization, the Finance Coordinator may not co-sign check requests for purchase orders or checks for payment.

Banking Arrangements: CCS will maintain its accounts either in the County Treasury or at a federally insured commercial bank or credit union. Funds will be deposited in non-speculative accounts including federally-insured savings or checking accounts or invested in non-speculative federally-backed instruments or in the County's Pooled Money Investment Fund. If funds are held in accounts outside of the County Treasury, the Board must appoint and approve all individuals authorized to sign checks or warrants in accord with these policies. All checks must have the additional signature of the Superintendent & CEO. An approved vendor will reconcile the school's ledger(s) with its bank accounts or accounts in the county treasury on a monthly basis and prepare (1) a balance sheet, (2) a comparison of budgeted to actual revenues and expenditures to date, and (3) a cash flow statement. The Superintendent & CEO and the Board will regularly review these statements. The School will deposit all funds received as soon as practical upon receipt. All funds received shall be deposited or transferred into the school's accounts at the earliest possible convenience and in no event later than 48 hours after receipt.

Purchasing Procedures: When state and federal law do not provide for more stringent requirements, it is the policy of the Board that all purchases over $50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services. The Superintendent & CEO or his/her designee shall not approve purchase orders or check requests lacking such documentation. Documentation shall be attached to all check and purchase order requests showing that at least three (3) vendors were contacted and such documentation shall be maintained for three (3) years.

- The Superintendent & CEO may authorize expenditures and may sign related contracts within the approved budget. The Governing Board must review all expenditures. This will be done via approval of a check register which lists all checks written during a set period of time and includes check #, payee, date, and amount. The Governing Board must also approve contracts over $100,000.
- The Assistant Superintendent & Chief Financial Officer must approve all purchases. Purchase requisitions, authorizing the purchase of items greater than $25,000, must be signed by the Superintendent & CEO and submitted with the related invoice.
- When approving purchases, the Assistant Superintendent & Chief Financial Officer must:
    - Determine if the expenditure is budgeted
    - Determine if funds are currently available for expenditures (i.e. cash flow)
    - Determine if the expenditure is allowable under the appropriate revenue source
    - Determine if the expenditure is appropriate and consistent with the vision, approved charter, school policies and procedures, and any related laws or applicable regulations
    - Determine if the price is competitive and prudent. All purchases over $50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services
- Any individual making an authorized purchase on behalf of the Charter School must provide appropriate documentation of the purchase.
- Individuals other than those specified above are not authorized to make purchases without pre-approval.
- Individuals who use personal funds to make unauthorized purchases will not be reimbursed. Authorized purchases will be promptly reimbursed by a payroll reimbursement upon receipt of a reimbursement form and original receipt documenting the purchase.
- The Superintendent & CEO may authorize an individual to use a school credit card to make an authorized purchase on behalf of the Charter School, consistent with the guidelines and limitations provided by the Superintendent & CEO and/or Board.
    - Individuals who receive a school credit card must ensure the card is kept in a safe location.
    - If receipts are not available or are "missing," the individual making the charge may submit an "Affidavit for a Lost Receipt" Form, otherwise they will be held personally responsible for payment.
    - Credit cards will bear the names of both CHARTER SCHOOL and the individual user.
    - Debit cards are not allowed.
    - All purchases must also comply with the Procurement and Contract Bidding Policy.

Petty Cash

- The Assistant Superintendent & Chief Financial Officer will manage the petty cash fund.
- The petty cash fund will be capped at $1,000.
- All petty cash will be kept in a locked petty cash box in a locked drawer or file cabinet. Only the Assistant Superintendent & Chief Financial Officer and Superintendent & CEO will have keys to the petty cash box and drawer or file cabinet.
- All disbursements will require a completed and signed petty cash slip. A register receipt for all purchases must be attached to the petty cash slip.
- Assistant Superintendent & Chief Financial Officer will insure that the petty cash slip is properly completed and that a proper receipt is attached.
- At all times the petty cash box will contain receipts and cash totaling $1,000. A register receipt must support the petty cash slip. The individual using the petty cash to make a purchase is responsible for submitting the receipt for the petty cash slip to the Assistant Superintendent & Chief Financial Officer within 24 hours of withdrawing the petty cash.
- When expenditures total $200, the Assistant Superintendent & Chief Financial Officer will total the disbursements, complete a petty cash reimbursement form, and obtain the approval of the Superintendent & CEO. This should be done on at least a quarterly basis. The petty cash slips and supporting receipts will be attached to the reimbursement request form and forwarded to back office provider.
- Petty cash fund reimbursement checks will be made payable to the Assistant Superintendent & Chief Financial Officer. The reimbursement check will be immediately cashed and the money returned to the petty cash fund.
- Any irregularities in the petty cash fund will be immediately reported in writing to the Superintendent & CEO.
- Loans will not be made from the petty cash fund.
- The Superintendent & CEO will conduct unscheduled counts of the petty cash fund.

Record Keeping: Transaction ledgers, canceled/duplicate checks, attendance and entitlement records, payroll records, and any other necessary fiscal documents will be maintained by Charter School staff in a secure cloud-based server for at least three years, or as long as required by applicable law, whichever is longer.

Appropriate back-up copies of electronic and paper documentation, including financial and attendance accounting data, will be regularly prepared and stored in a secure cloud-based server separate from the Charter School Property Inventory.

The Superintendent & CEO, or his/her designee, shall establish and maintain an inventory of all non-consumable goods and equipment worth over $2,500. This inventory shall include the original purchase price and date, a brief description, serial numbers, and other information appropriate for documenting the school's assets. This property will be inventoried on an annual basis and lists of any missing property shall be presented to the Board. All non-consumable school property lent to scholars shall be returned to the school no later than five (5) working days after the end of the school year. Any excess or surplus property owned by the school may be sold or auctioned by the Superintendent & CEO, or his/her designee, provided he/she engages in due diligence to maximize the value of the sale or auction to the school. The sale or auction of property owned by the school with a fair market value in excess of $25,000 shall be approved in advance by the Board.

Payroll Services: CCS will contract with a reputable, bonded, and insured payroll contractor to prepare payroll checks, tax and retirement withholdings, tax statements, and to perform other payroll support functions. The Superintendent & CEO, or his/her designee, will establish and oversee a system to prepare time and attendance reports and submit payroll check requests.

The Superintendent & CEO and Board will review payroll statements annually to ensure that (1) the salaries are consistent with staff contracts and personnel policies and (2) the proper tax, retirement, disability, and other withholdings have been deducted and forwarded to the appropriate authority. All staff expense reimbursements will be on payroll checks. Upon hiring of staff, a personnel file will be established with all appropriate payroll-related documentation including a federal I-9 form, tax withholding forms, retirement date, and an accounting of the use of sick leave.

Negotiating Funding Entitlements: The Superintendent & CEO shall prepare a set of negotiating principles for Board approval prior to engaging in negotiations over funding entitlements with the charter granting agency and state. Superintendent & CEO will take lead responsibility for negotiating all revenue arrangements with the charter granting agency and appropriate state education agency staff. These arrangements will be documented in appropriate and detailed Memoranda of Understanding for approval by the Board.

Required Budget and Other Fiscal Reports: The Superintendent & CEO, working in conjunction with the Assistant Superintendent of Business Services, will produce and submit to authorizers any and all required fiscal reports as may be required by state or federal law, or mandated by the terms of the school's charter. These include, but are not limited to, attendance reports, enrollment and other data reports required by the California Basic Educational Data System, and other related data.

Fundraising, Grant Solicitation, and Donation Recognition: All fundraising or grant solicitation activities on behalf of the Charter School must be approved in advance by the Board. The Board shall be informed of any conditions, restrictions, or compliance requirements associated with the receipt of such funds, including grants or categorical programs sponsored by the state or federal government. The Board shall be notified no later than the next regular board meeting of the award or receipt of any funds and shall approve the receipt of any grants, donations, or receipts of fundraising proceeds prior to their deposit in the school's accounts.

Annual Financial Audit

- The Board will annually appoint a finance committee by January 1 to select an auditor by March 1 prior to year-end (June 30th).
- Any persons with expenditure authorization or recording responsibilities within the Charter School may not serve on the committee.
- The committee will annually contract for the services of an independent certified public accountant to perform an annual fiscal audit.
- The audit shall include, but not be limited to:
    - An audit of the accuracy of the financial statements
    - An audit of the attendance accounting and revenue accuracy practices

Contracts:

- Consideration will be made of in-house capabilities to accomplish services before contracting for them.
- Office staff will keep and maintain a contract file evidencing the competitive bids obtained (if any) and the justification of need for any contracts over $50,000.
    - Competitive bids will be obtained where required by law or otherwise deemed appropriate and in the best interests of the Charter School.
- Written contracts clearly defining work to be performed will be maintained for all contract service providers (e.g. consultants, independent contractors, subcontractors).
- Contract service providers must show proof of being licensed and bonded, if applicable, and of having adequate liability insurance and worker's compensation insurance currently in effect. The Superintendent & CEO may also require that contract service providers list the Charter School as an additional insured.
- If the contract service provider is a sole proprietor or a partnership (including LP, and LLP), the Assistant Superintendent & Chief Financial Officer will obtain a W-9 from the contract service provider prior to submitting any requests for payments.
- The Superintendent & CEO will approve proposed contracts and modifications in writing.
- Contract service providers will be paid in accordance with approved contracts as work is performed.
- The Superintendent & CEO and/or his designee will be responsible for ensuring the terms of the contracts are fulfilled.
- If a conflict of interest exists, the Board shall comply with Government Code Section 1090 et seq., the Political Reform Act, and Corporations Code 5233.
- All contracts must also comply with the Procurement and Contract Bidding Policy.

Accounts Payable:

- All original invoices will immediately be forwarded to the Finance Department
- The Finance Department will carefully review each invoice, attach all supporting documentation, and verify that the specified services and/or goods were received. When receiving tangible goods from a vendor, the person designated to receive deliveries should trace the merchandise to the packing list and notify the Finance Coordinator of any items that were not in the shipment;
- The Finance Coordinator will complete the required information, including noting the specific account code and restrictor code (if applicable) for the item that is to be charged for the specified expenditures. This information will be entered into a weekly payment allocation form which is sent to the Assistant Superintendent & Chief Financial Officer for review and approval;
- Once approved by the Assistant Superintendent & Chief Financial Officer, he/she will stamp an approval on the invoice and forward the invoices to the Finance Coordinator;
- The invoice and supporting documentation will be sent to the back office provider on at least a weekly basis. The back office provider will then process the invoices with sufficient supporting documentation;
- The Assistant Superintendent & Chief Financial Officer may authorize the back office provider to pay recurring expenses (e.g. rent) with the Superintendent & CEO's formal approval (signature) on the invoice when dollar amounts fall within a predetermined range. A list of the vendors and the dollar range for each vendor must be provided to the back office provider in writing and updated on an annual basis.

Bank Checks

- The Board will approve, in advance, the list of authorized signers on the school account. The Superintendent & CEO, the Assistant Superintendent & Chief Financial Officer, and any other employee authorized by the Board may sign bank checks within established limitations.
- The Superintendent & CEO, with advance Board approval, is authorized to open and close bank accounts.
- The Assistant Superintendent & Chief Financial Officer, the Superintendent & CEO and the back office provider will be responsible for all blank checks and will keep them under lock and key.
- When there is a need to generate a bank check, the Assistant Superintendent of Business Services will send appropriate approved documentation to the back office provider.
- Once approved by the Superintendent & CEO and the Assistant Superintendent & Chief Financial Officer, the back office provider issues the check based on the check authorization prior to obtaining the appropriate signature(s).
- The Superintendent & CEO and the Assistant Superintendent & Chief Financial Officer will co-sign all checks.

Board Policy #: 7
Adopted/Ratified: March 28, 2021
Revision Date:

SECTION 7 – FISCAL – STAFF COMPENSATION

1. Purpose
    a. The Compass Charter Schools ("Compass") Board of Directors recognizes that an attractive compensation package is necessary to attract and retain valuable employees to Compass Charter Schools. The purpose of this policy is to ensure that compensation for Compass employees is transparent, equitable, fiscally responsible, and aligned with the Compass budgeting philosophy.
    b. The Compass Board further recognizes that an annual review of the compensation structure of all top level persons employed by the Charter Schools is necessary to ensure that the Charter Schools' compensation plan is aligned with that of similar schools in the areas where Compass operates.

2. Teacher Compensation
    a. A salary pay scale will be developed and reviewed annually by the Board. Rates of pay at similar schools in the areas where Compass schools operate will be considered during the development and review of the pay scale for Compass.
    b. Teachers having or earning a graduate degree in Education will be paid an additional amount for their degree. The amount of graduate degree additional pay will be included on the salary pay scale.
    c. The Board will adopt a budget target percentage for teacher compensation. Area averages in the areas where Compass operates will be considered when determining this target percentage. Salary increases or beginning salary offerings which result in material increases beyond the budget target percentages shall not be approved without written approval by the Superintendent & CEO.
    d. Performance considerations shall be presented to the Board by the Superintendent & CEO annually. Performance considerations for salary increases may include:
        i. Significant change in responsibility, training level, or credential,
        ii. Percentage of scholars attaining at least one year's worth of growth as shown by standardized tests or other types of classroom assessments,
        iii. Percentage of scholars scoring proficient or better on standardized tests or other types of classroom assessments,
        iv. Personnel, peer, and self-evaluation including personal goals met, and/or
        v. Surveys of parents and scholars regarding performance.
    e. Fiscal considerations for salary increases will include:
        i. Excess or deficiency in budget,
        ii. Cost of living adjustment in budget,
        iii. Budget target percentage available for compensation increases, and
        iv. Having adequate funds to manage cash flow needs in the event that the State defers apportionment payments.

3. Administrative Compensation
    a. A salary pay scale will be developed and reviewed annually by the Board. Rates of pay at similar schools in the areas Compass schools operate will be

considered during the development and review of the pay scale for Compass.

b. The Board will adopt a budget target percentage for administrative compensation. Area averages in the areas Compass operates will be considered when determining this target percentage. Salary increases or beginning salary offerings which result in material increases beyond the budget target percentages shall not be approved without written explanation by the Superintendent & CEO.
c. Performance considerations for salary increases may include:
    i. Significant change in responsibility, training level, or credential,
    ii. Personnel, peer, and self-evaluation including personal goals met, and/or
    iii. Surveys of parents and scholars regarding performance.
d. Fiscal considerations for salary increases will include:
    i. Excess or deficiency in budget,
    ii. Cost of living adjustment in budget,
    iii. Budget target percentage available for compensation increases, and
    iv. Having adequate funds to manage cash flow needs in the event that the State defers apportionment payments.

4. Support Staff Compensation

a. An hourly wage scale will be developed and reviewed annually by the Board. Rates of pay at similar schools in the area will be considered during the development and review of the scale for Compass.
b. The Board will adopt a budget target percentage for support staff compensation. Area averages in the areas where Compass operates will be considered when determining this target percentage. Hourly rate increases and staffing which result in material increases beyond the budget target percentages shall not be approved without written explanation by the Superintendent/CEO.
c. Performance considerations for hourly wage increases may include:
    i. Significant change in responsibility, training level, or credential,
    ii. Personnel, peer, and self-evaluation including personal goals met, and/or
    iii. Surveys of parents and scholars regarding performance.
d. Fiscal considerations for salary increases will include:
    i. Excess or deficiency in budget,
    ii. Cost of living adjustment in budget,
    iii. Budget target percentage available for compensation increases, and
    iv. Having adequate funds to manage cash flow needs in the event that the State defers apportionment payments.

5. Benefits Package

a. Benefits will be offered to faculty and staff according to applicable law.
b. The Board will adopt a budget target percentage for benefits compensation. Area averages in the areas where Compass operates will be considered when determining this target percentage.
c. Benefits may be increased by the Board as budget target percentages allow.

6. Compensation Rate Benchmarks

a. Compensation for all employees shall be benchmarked at the fiftieth (50th) percentile of comparable public schools and charter networks.

7. One-Time Monies

a. When one-time monies are received, they will not be included in the calculation of the target percentages for teacher compensations, administrative compensation, support staff compensation or benefits package.
b. If one-time monies are received and allocated by the Board for compensation it will be in the form of a one-time stipend or bonus and only as may be allowed by law.
c. It is the goal of the Board that one-time monies will not be used for any recurring expenses beyond the year in which they are received.

8. Cost of Living Adjustments/Differential Pay

a. When a cost of living adjustment is made to state funding, the percentage of the adjustment will be implemented in employee compensation rates if the Board determines that there are not other budgetary needs.
b. There will be no differential in pay to employees based on location of work.

9. Mid-Year Budget Adjustments

a. If, as a result of a State Budget revision, base revenue changes downward during the fiscal year, then the Board reserves the right to adjust compensation downward.
b. Mid-year revenue increases will be handled in the same manner as one-time monies if any compensation increases are granted.

10. Fiscal Emergencies/ADA Decline

a. If the Compass Charter Schools are in circumstances that are determined to be a fiscal emergency by the Board, compensation increases for all employees may be frozen during the period of the emergency, and existing compensation may be re-evaluated for the duration of the emergency.

11. Annual Compensation Review for the Superintendent & CEO

a. Process for Compensation Review
    i. The process shall include three elements:
        1. Review and approval by the Board;
        2. Use of data as to comparable compensation;
        3. Performance
b. Review and Approval
    i. The compensation of the Superintendent & CEO is reviewed and approved by the Board during open session at a regular meeting of the board. Persons with conflicts of interest with respect to the compensation arrangement at issue shall not be involved in this review and approval.
c. Use of Data as to Comparable Compensation
    i. The compensation of the Superintendent & CEO is reviewed and approved using data as to comparable compensation for similarly qualified persons in functionally comparable positions at similarly situated organizations.
d. Contemporaneous Documentation and Recordkeeping
    i. There is contemporaneous documentation and recordkeeping with respect to the deliberations and decisions regarding the compensation arrangement.

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Revision Date:

SECTION 8 - FISCAL – PROCUREMENT AND CONTRACT BIDDING

I. General

The Board of Directors ("Board") for Compass Charter Schools ("Charter School") declares its intent for the Charter School to procure goods and services as well as bidding for construction projects such as new building and facility construction, reconstruction, rehabilitation, alterations and additions in a manner consistent with the guidelines set forth herein. The Charter School's practices have been designed to give fair and equitable treatment to all persons who deal with the Charter School's procurement system, to provide maximum economy in procurement activities, and to foster competition within the free enterprise system.

Notwithstanding any provision of this policy, state or federal law shall be complied with to the extent this policy is inconsistent with state or federal law on any particular procurement decision or construction project.

II. Procurement Defined

Procurement for the purposes of this policy is defined as buying, purchasing, renting, leasing, or otherwise acquiring goods, services, or construction for the Charter School. It also includes all functions that pertain to the obtaining of any good, service, or construction for the Charter School, including complying with bidding procedures as described herein, as well as administering agreements for goods, services, or construction once established.

Procurement does not include expenditures that typically would not be reviewed by any system of hierarchy for approval, such as using a petty cash fund to purchase lunch for a group of teachers at a professional development seminar.

III. Procurement Policy

Any procurement of goods, services, or construction shall be made upon considering the totality of the circumstances surrounding the procurement, which may include but not be limited to price, quality, availability, timelines, reputation, and prior dealings.

No work, project, service, or purchase shall be split or separated into smaller work orders or projects for the purpose of evading the requirements of this policy.

IV. Professional Services Contracts

The Charter School may hire such professional services as are needed for the operation of the Charter School without complying with the bidding procedures described in Sections VII and VIII herein. Such professional services include, but are not limited to, the following professionals: attorneys, architects, accountants, engineers, accountants, construction management, administrative services, and financial advisors.

In selecting professionals for engagement, the Charter School may consider all relevant factors, including but not limited to experience, education, expertise, reputation, and cost.

The selection of professionals providing these services shall be within the sole discretion of the Board.

V. Construction Contracts

Procurement of construction and/or construction related services (other than those services which constitute professional services as described above in Section IV) must be made in accordance with the bidding procedures described herein. Additionally, when applicable, the Charter School shall comply with the prevailing wage laws applicable to certain construction and/or services that constitute a "public works" project as defined under the Labor Code. (Labor Code §§ 1720, 1720.2, and 1720.3.)

A "public works" project is defined as "construction, alteration, demolition, installation, or repair work done under contract and paid for in whole or in part out of public funds…" (Labor Code § 1720(a)(1).)

An outline of the additional requirements applicable to public works projects are further described in Section X.

VI. Guidelines for Selecting Contractors/Vendors

A. Prequalification Procedures

The Charter School may, but is not required to, establish prequalification procedures for any contract for which bids are required.

B. Suspended and Debarred Contractors/Subcontractors

The Charter School may not consider any contractor or subcontractor that is debarred, suspended or is otherwise excluded from bidding on, accepting, or performing any public works contracts, by the Division of Labor Standards Enforcement ("DLSE") of the California Department of Industrial Relations ("DIR").

The Charter School is required to vet any potential contractor or subcontractor for suspension or debarment before a contract may be awarded. A list of suspended and debarred contractors and subcontractors may be accessed through the DLSE Debarments Web Site at http://www.dir.ca.gov/dlse/debar.html.

VII. Informal Bidding and Contract Approval – Contracts up to $50,000

All purchases over $50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services of similar value. The Superintendent & CEO or designee shall not approve invoices, purchase orders, or check requests lacking such documentation. Documentation shall be attached to all invoices, purchase orders, and check requests indicating that at least three (3) contractors/vendors were contacted, and such documentation shall be maintained for three (3) years. Informal quotes or proposals for goods and/or services may be requested and received in writing by mail, email, facsimile, and/or verbally, such as by telephone, as long as properly documented.

Contracts for purchases of up to $100,000 within the approved budget may be executed by the Superintendent & CEO without prior Board approval. The Governing Board must review all expenditures. This will be done via approval of a check register which lists all checks written during a set period of time and includes check #, payee, date, and amount.

The Governing Board must also approve contracts over $100,000. The Assistant Superintendent of Business Services must approve all purchases.

VIII. Formal Bidding and Contract Approval – Contracts Over $50,000

Unless state or federal law provides otherwise, contracts for the purchase of more than $50,000 worth of equipment, materials or supplies to be furnished, sold, or leased to the Charter School, or contracts for more than $50,000 worth of services or construction (excluding those professional services agreements enumerated in Section IV), shall be subject to the formal bidding requirements set forth herein.

If formal bidding is required, the Charter School shall utilize the following procedures:

A. Seeking Bids

The Charter School shall seek bids from those sources able to offer the best prices, consistent with quality, quantity, delivery, and service. To ensure that good value is received for funds expended, the request for bids shall be carefully designed to clearly and completely describe in detail the quality, delivery, and service required, and shall include the criteria that will be used to evaluate the offers and the relative weights given to the criteria. Further, the request for bids shall specify the date in which all bids must be received by the Charter School.

Notice of the request for bids may be provided in one or more of the following ways:

(1) Publishing the request for bids in at least one newspaper of general circulation within the boundaries of each authorizer's County, once a week for at least [two (2) weeks] before the deadline for receiving bids;
(2) Posting the request for bids on the Charter School's website or other electronic portal for at least [two (2) weeks] before the deadline for receiving bids; and/or
(3) Directly submitting notice of the request for bids to an adequate number of qualified sources to permit reasonable competition consistent with the nature and purpose of this policy. Any list of potential contractors/vendors that is generated must be current and include enough qualified sources to ensure reasonable open and free competition.

B. Opening Bids

Bids may be opened only at the time and place prescribed by the Superintendent & CEO or designee. A bid that has been opened may not be changed for the purpose of correcting an error in the bid price. However, bidders retain the right to withdraw a bid due to a material mistake in the bid. After bids have been opened, they shall be available for inspection or copy by any interested party. The Charter School must maintain the bid document(s) for the duration of the contract and for three (3) years beyond the completion of the contract.

C. Contract Award

The Board, or any employee of the Charter School to whom responsibility has been delegated, shall award a competitively bid contract at the bid amount to the bidder offering the best value to the Charter School according to its selection criteria. The contract need not be awarded to the lowest responsible bidder. The selection criteria

may include the following factors:

(1) Purchase price;
(2) Reputation of the contractor/vendor and of the contractor's/vendor's goods and/or services;
(3) Quality of the contractor's/vendor's goods and/or services;
(4) Extent to which the goods and/or services meet the Charter School's needs;
(5) Contractor's/vendor's record of past performance;
(6) Contractor's/vendor's financial standing and capacity;
(7) Contractor's/vendor's past relationship with the Charter School; and
(8) Total long-term cost to the Charter School to acquire the goods and/or services.

Contracts over $100,000 must be approved by the Board prior to execution by the Superintendent & CEO.

Any and all bids may be rejected if there is a sound, documented reason for doing so.

D. Protest by Bidders

A bidder may protest a bid award if he/she believes that the award was inconsistent with this policy, the bid's specifications, or was not in compliance with the law .

A protest must be filed in writing with the Superintendent & CEO or designee within five (5) business days after receipt of notification of the contract award. The bidder shall submit all documents supporting or justifying the protest. A bidder's failure to file the protest documents in a timely manner shall constitute a waiver of his/her right to protest the award of the contract.

The Superintendent & CEO or designee shall review the documents submitted with the bidder's claims and render a decision in writing within thirty (30) business days. The Superintendent & CEO or designee may also convene a meeting with the bidder to attempt to resolve the problem.

The bidder may appeal the Superintendent & CEO or designee's decision to the Board. The Superintendent & CEO or designee shall provide reasonable notice to the bidder of the time for Board consideration of the contract award. The Board's decision shall be final.

IX. Noncompetitive Proposals

A noncompetitive procurement proposal is the solicitation of a proposal from only one (1) source. Noncompetitive procurement proposals may only be used after the Charter School has solicited bids and/or proposals from at least three (3) sources, and has determined and documented that competition was inadequate. The Board, in its sole discretion, shall select the single source offering the best value to the Charter School according to its selection criteria list above. If a good, service, or construction is available only from a single source, this may also be documented to justify a noncompetitive proposal.

X. Public Works Projects and Prevailing Wage Requirements

When required by law, the Charter School shall comply with prevailing wage requirements.

XI. Mandatory Contract Terms

All contracts entered into with the Charter School must contain the following terms when applicable:

(1) A ceiling price that the contractor/vendor exceeds at its own risk.
(2) Retention of all required records by the contractor/vendor for three (3) years after the Charter School makes final payments and all other pending matters are closed.
(3) Access by the Charter School or any of their duly authorized representatives to any books, documents, papers, and records of the contractor which are directly pertinent to that specific contract for the purpose of making audit, examination, excerpts, and transcriptions.
(4) Administrative, contractual, or legal remedies in instances where contractors/vendors violate or breach contract terms, and the sanctions and penalties that are appropriate.
(5) Termination for cause and for convenience by the Charter School, including the manner by which it will be affected and the basis for settlement.

XII. Maintenance of Records

The Charter School shall document specific actions for any procurement. These specific actions include, but are not limited to:

(1) The rationale for the method of procurement.
(2) The selection of contract type.
(3) The selection or rejection of a contractor/vendor, and supporting rationale.
(4) The basis for a contract price.

Documentation of each of these actions shall be prepared as the actions occur within any given instance of procurement.

Procurement records, accepted bid documents, and selected contracts will be retained by the Charter School for not less than three (3) years.

XIII. Conflict of Interest

If a conflict of interest exists, the Board shall comply with Government Code Section 1090 et seq., the Political Reform Act, and Corporations Code 5233.

No Board member or Charter School employee shall solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements.

To the extent permitted by law, any Board member or Charter School employee who violates this section may be subject to penalties, sanctions, and other disciplinary actions.

XIV. Reservation

The Charter School Procurement and Contract Bidding Policy shall be amended and updated if necessary to comply with changes in acceptable procurement practices.

XV. Federal Grants or Programs

In addition to complying with all conditions herein, all contracts involving federal grants or other federal programs shall also fully comply with all applicable federal procurement guidelines related to such programs. In the event there is a conflict between this policy and the applicable federal procurement guidelines, the federal guidelines shall prevail.

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SECTION 9 – CAPITAL IMPROVEMENT, PROCUREMENT AND CONTRACT BIDDING POLICY

I. General

The Board of Directors ("Board") for Compass Charter Schools ("Charter School") declares its intent for the Charter School to maintain a capital improvement plan for its facilities, and establish guidelines for the procurement of goods and services as well as bidding for construction projects such as new building and facility construction, reconstruction, rehabilitation, alterations and additions. The Charter School's practices have been designed to give fair and equitable treatment to all persons who deal with the Charter School's procurement system, to provide maximum economy in procurement activities, and to foster competition within the free enterprise system.

The policies and procedures presented herein are consistent with current applicable state and federal law. As necessary, the Charter School's Board of Directors will revise this document as the relevant laws may change from time to time.

II. Capital Improvement Program

The Superintendent & CEO shall present to the Governing Board annually a multi-year Capital Improvement Program which will include recommendations regarding timing, location, costs and savings associated with new building requirement and restoration and renewal of existing school facilities. The Superintendent & CEO's report will:

1) Provide five-year enrollment projections prepared under the direction of the Superintendent & CEO and which have been reviewed and brought up-to-date annually.
2) Provide an assessment for all school facilities related to building renewal, reconfiguration or expansion to meet educational program needs.
3) Identify interim and long-term options that address the identified needs.
4) Articulate a rationale for recommended solutions.
5) Provide a detailed scope of work (e.g. number of rooms, extent of building system improvements) for each recommended project.
6) Provide a cost estimate for each recommended project that achieves compliance with relevant educational specifications. This estimate will include all project costs (labor, materials, legal review, permit fees, utility connections/extensions, architect/engineering fees, project management, hazardous material abatement, installation of technology infrastructure, contingency, equipment, etc.).

III. Procurement Defined

Procurement for the purposes of this policy is defined as buying, purchasing, renting, leasing, or otherwise acquiring goods, services, or construction for the Charter School. It also includes all functions that pertain to the obtaining of any good, service, or construction for the Charter School, including complying with bidding procedures as described herein, as well as administering agreements for goods, services, or construction once established.

Procurement does not include expenditures that typically would not be reviewed by any system of hierarchy for approval, such as using a petty cash fund to purchase lunch for a group of teachers at a professional development seminar.

IV. Procurement Policy

Any procurement of goods, services, or construction shall be made upon considering the totality of the circumstances surrounding the procurement, including but not be limited to price, quality, availability, timelines, reputation, and prior dealings.

No work, project, service, or purchase shall be split or separated into smaller work orders or projects for the purpose of evading the requirements of this policy.

V. Professional Services Contracts

The Charter School may hire such professional services as are needed for the operation of the Charter School without complying with the bidding procedures described in Sections VIII and IX herein. Such professional services include, but are not limited to, the following professionals: accountants, administrative professionals, architects, attorneys, construction managers, engineers, financial advisors and teachers.

In selecting professionals for engagement, the Charter School may consider all relevant factors, including but not limited to experience, education, expertise, reputation, and cost. The selection of professionals providing these services shall be within the sole discretion of the Board.

VI. Construction Contracts

Procurement of construction and/or construction related services (other than those services which constitute professional services as described above in Section V) must be made in accordance with the bidding procedures described herein. Additionally, the Charter School must comply with the prevailing wage laws applicable to certain construction and/or services that constitute a "public works" project as defined under the Labor Code. (Labor Code §§ 1720, 1720.2, and 1720.3.)

A "public works" project is defined as "construction, alteration, demolition, installation, or repair work done under contract and paid for in whole or in part out of public funds" and includes "work performed during the design and preconstruction phases of construction" (e.g., surveying) as well as "postconstruction" work (i.e., cleanup). (Labor Code § 1720(a)(1).)

An outline of the additional requirements applicable to public works projects are further described in Section XI.

VII. Guidelines for Selecting Contractors/Vendors

A. Prequalification Procedures

The Charter School may, but is not required to, establish prequalification procedures for any contract for which bids are required.

B. Suspended and Debarred Contractors/Subcontractors

The Charter School may not consider any contractor or subcontractor that is debarred, suspended or otherwise excluded from bidding on, accepting, or performing any public works contracts, by the Division of Labor Standards Enforcement ("DLSE") of the California Department of Industrial Relations ("DIR").

The Charter School is required to vet any potential contractor or subcontractor for suspension or debarment before a contract may be awarded. A list of suspended and debarred contractors and subcontractors may be accessed through the DLSE Debarments Web Site at http://www.dir.ca.gov/dlse/debar.html.

VIII. Informal Bidding and Contract Approval – Contracts up to $50,000

All purchases of at least $25,000 and up to $50,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services of similar value. The Superintendent & CEO or designee shall not approve invoices, purchase orders, or check requests lacking such documentation. Documentation shall be attached to all invoices, purchase orders, and check requests indicating that at least three (3) contractors/vendors were contacted, and such documentation shall be maintained for three (3) years. Informal quotes or proposals for goods and/or services may be requested and received in writing by mail, email, facsimile, and/or verbally, such as by telephone, as long as properly documented.

Contracts for purchases of up to $100,000 may be executed by the Executive Director without prior Board approval.

IX. Formal Bidding and Contract Approval – Contracts Over $50,000

Contracts for the purchase of more than $50,000 worth of equipment, materials or supplies to be furnished, sold, or leased to the Charter School, or contracts for more than $50,000 worth of services or construction (excluding those professional services agreements described in Section V), shall be subject to the formal bidding requirements set forth herein.

If formal bidding is required, the Charter School shall utilize the following procedures:

A. Seeking Bids

The Charter School shall seek bids from those sources able to offer the best prices, consistent with quality, quantity, delivery, and service. To ensure that good value is received for funds expended, the request for bids shall be carefully designed to clearly and completely describe in detail the quality, delivery, and service required, and shall include the criteria that will be used to evaluate the offers and the relative weights given to the criteria. Further, the request for bids shall specify the date by which all bids must be received by the Charter School.

Notice of the request for bids may be provided in one or more of the following ways:

(1) Publishing the request for bids in at least one newspaper of general circulation within the boundaries of Los Angeles, San Diego and Yolo Counties, once a week for at least two (2) weeks before the deadline for receiving bids;

(2) Posting the request for bids on the Charter School's website or other electronic portal for at least two (2) weeks before the deadline for receiving bids; and/or
(3) Directly submitting notice of the request for bids to an adequate number of qualified sources to permit reasonable competition consistent with the nature and purpose of this policy. Any list of potential contractors/vendors that is generated must be current and include enough qualified sources to ensure reasonable open and free competition.

B. Opening Bids

Bids may be opened only at the time and place prescribed by the Executive Director or designee. A bid that has been opened may not be changed for the purpose of correcting an error in the bid price. However, bidders retain the right to withdraw a bid due to a material mistake in the bid. After bids have been opened, they shall be available for inspection or copy by any interested party. The Charter School must maintain the bid document(s) for the duration of the contract and for three (3) years beyond the completion of the contract.

C. Contract Award

The Board, or any employee of the Charter School to whom responsibility has been delegated, shall award a competitively-bid contract at the bid amount to the bidder offering the best value to the Charter School according to its selection criteria. The contract need not necessarily be awarded to the lowest responsible bidder. The selection criteria may include the following factors:

(1) Purchase price;
(2) Reputation of the contractor/vendor and of the contractor's/vendor's goods and/or services;
(3) Quality of the contractor's/vendor's goods and/or services;
(4) Extent to which the goods and/or services meet the Charter School's needs;
(5) Contractor's/vendor's record of past performance;
(6) Contractor's/vendor's financial standing and capacity;
(7) Contractor's/vendor's past relationship with the Charter School; and
(8) Total long-term cost to the Charter School to acquire the goods and/or services.

Contracts over $100,000 must be approved by the Board prior to execution by the Superintendent & CEO.

Any and all bids may be rejected if there is a sound, documented reason for doing so.

D. Protest by Bidders

A bidder may protest a bid award if he/she believes that the award was inconsistent with this policy, the bid's specifications, or was not in compliance with law.

A protest must be filed in writing with the Superintendent & CEO or designee within five (5) business days after receipt of notification of the contract award. The bidder shall submit all documents supporting or justifying the protest. A bidder's failure to file the protest documents in a timely manner shall constitute a waiver of his/her right to protest the award of the contract.

The Superintendent & CEO or designee shall review the documents submitted with the bidder's claims and render a decision in writing within thirty (30) business days. The Executive Director or designee may also convene a meeting with the bidder to attempt to resolve the problem.

The bidder may appeal the Superintendent & CEO or designee's decision to the Board. The Superintendent & CEO or designee shall provide reasonable notice to the bidder of the time for Board consideration of the contract award. The Board's decision shall be final.

X. Noncompetitive Proposals

A noncompetitive procurement proposal is the solicitation of a proposal from only one (1) source. Noncompetitive procurement proposals may only be used after the Charter School has solicited bids and/or proposals from at least three (3) sources, and has determined and documented that competition was inadequate. In those circumstances, the Board, in its sole discretion, may select the single source offering the best value to the Charter School according to its selection criteria list above. If a good, service, or construction is available only from a single source, this may also be documented to justify a noncompetitive proposal.

XI. Public Works Projects and Prevailing Wage Requirements

A. Mandatory Public Works Project Request for Bids Terms and Specifications

All requests for bids (or the "call for bids") and bid specifications for construction and/or services, which constitute a "public works" project ("Project"), issued and published by the Charter School, must contain the following terms and specifications when applicable:

(1) General Project Description as Public Work: In the call for bids, the Charter School must provide a general description of the work required for the Project and state that "the Project is classified as a 'public work,' as defined in Labor Code Section 1720, to which not less than the general prevailing rate of per diem wages for work of a similar character and the rates for overtime and holiday work in the locality in which the work is to be performed for each craft, classification or type of worker needed to execute the contract shall be paid to all workers employed on the Project in accordance with Labor Code Section 1771."

(2) Bid Closing Date: The Charter School must also specify in the call for bids the place the contractor's bids are to be received, and the time by which they shall be received.

(3) Prevailing Wage Rate: The Charter School is required to specify in the call for bids and in the bid specifications the general rate of per diem wages as described in Section (A)(1) above. (Labor Code § 1773.2.) The general prevailing wage rate must be obtained from the Director of the DIR. The applicable general prevailing wage rates for any such public works project are available on the DIR website at http://www.dir.ca.gov/OPRL/dprewagedetermination.htm.

In lieu of specifying the rate of wages, the Charter School may include a statement in the call for bids and in the bid specifications that "copies of the prevailing rate of per diem wages are on file at its principal office and shall be made available to any interested part on request." (Labor Code § 1773.2.)

(4) Notice of DIR Enforcement: The Charter School shall specify in the call for bids that the Project is "subject to compliance monitoring and enforcement by the Department of Industrial Relations." (Labor Code § 1771.4(a)(1).)

(5) Registered Contractor Notice: The Charter School shall provide notice in the call for bids that "a contractor or subcontractor shall not be qualified to bid on, be listed in a bid proposal, or engage in the performance of any contract for public work, unless currently registered and qualified to perform public work pursuant to Section 1725.5." The Charter School shall not accept a bid or enter into a contract or subcontract without proof of the contractor or subcontractor's current registration to perform public work pursuant to Section 1725.5. (Labor Code § 1771.1.)

(6) Contractor/Vendor Bids: The Charter School shall require all contractor/vendor bids to expressly state that the contractor/vendor "will pay its workers the applicable prevailing wage rate in accordance with Labor Code Sections 1771 and 1774."

B. **Mandatory Public Works Project Contract Terms**

All contracts for construction and/or services that constitute a "public works" project ("Project") entered into with the Charter School must contain the following terms and provisions when applicable:

(1) General Project Description as Public Work: The Charter School must provide a general description of the work required for the Project and specify in the Project Contract that "the Project is classified as a 'public work,' as defined in Labor Code Section 1720, to which not less than the general prevailing rate of per diem wages for work of a similar character and the rates for overtime and holiday work in the locality in which the work is to be performed for each craft, classification or type of worker needed to execute the contract shall be paid to all workers employed on the Project in accordance with Labor Code Section 1771."

(2) Prevailing Wage Rate: The Charter School is required to specify in the Project Contract the general rate of per diem wages as described in Section (B)(1) above. (Labor Code § 1773.2.) The general prevailing wage rate must be obtained from the Director of the DIR. The applicable general prevailing wage rates for any such public works project are available on the DIR Wage Determination website at http://www.dir.ca.gov/OPRL/dprewagedetermination.htm.
In lieu of specifying the rate of wages, the Charter School may include a statement in the Project Contract that "copies of the prevailing rate of per diem wages are on file at its principal office and shall be made available to any interested party on request." (Labor Code § 1773.2.)

(3) Compensation Provision: The Charter School shall include a clause in the Project Contract that states, "In accordance with the provisions of Section 3700 of the Labor Code, every contractor will be required to secure the payment of compensation to his or her employees." (Labor Code § 1860.)

(4) Penalty Stipulation: The Charter School shall also include a stipulation in the Project Contract that notifies the contractor that the contractor or subcontractor will be subject to a penalty of twenty-five dollars ($25) for each calendar day a worker employed in the

execution of the Contract is required or permitted to work more than 8 hours in any one calendar day and 40 hours in any one calendar week without payment of the applicable overtime rate of pay. (Labor Code § 1813.)

(5) Underpayment of Prevailing Wage: The Project Contract must include a stipulation that states, "The difference between the prevailing wage rates and the amount paid to each worker for each calendar day or portion thereof for which each worker was paid less than the prevailing wage rate shall be paid to each worker by the contractor or subcontractor in accordance with Section 1775 of the Labor Code." (Labor Code § 1775(a)(2)(E).)

(6) Apprenticeship Requirement: The Charter School must also include a provision in the Project Contract that effectuates Labor Code Section 1777.5, which requires the contractor to employ properly registered apprentices for the Project. Specifically, the contractual provision must fix the responsibility of compliance with the apprenticeship requirements under Section 1777.5 for all apprenticeable occupations with the prime contractor on the Project. (Labor Code § 1777.5(n).)

(7) 8-Hour Work Day: The Project Contract shall also include a clause establishing that "Eight hours labor constitutes a legal day's work." (Labor Code § 1810.)

(8) Payroll Record Contract Provisions: The Charter School shall include a stipulation in the Project Contract effectuating Labor Code Section 1776, which requires the contractor to maintain accurate certified payroll records that include the name, address, social security number, work classification, straight time and overtime hours worked each day and week, and the actual per diem wages paid to each apprentice, worker, or other employee of the contractor in connection with the public work, and a written declaration of the employee verifying the truth of the payroll record. (Labor Code § 1776.)

The Charter School must designate the times the contractor and subcontractor are required to furnish the payroll records to the Compliance Monitoring Unit ("CMU") of the DIR. (8 CCR § 16461(b).) The Project Contract shall specify that "the contractor and each subcontractor shall furnish the payroll record of wages paid as specified in Section 1776 directly to the Compliance Monitoring Unit ("CMU") of the DIR on a monthly basis until the completion of the Project, or within 10 days of any separate request by the CMU." (8 CCR § 16461(b).)

Further, the Project Contract must include a provision stating, "Contract payments shall not be made when payroll records are delinquent or inadequate." (8 CCR § 16421(a)(6).)

XII. Mandatory Contract Terms

All contracts entered into with the Charter School must contain the following terms when applicable:

1. A ceiling price that the contractor/vendor exceeds at its own risk.
2. Retention of all required records by the contractor/vendor for three (3) years after the Charter School makes final payments and all other pending matters are closed.
3. Access by the Charter School or any of their duly authorized representatives to any books, documents, papers, and records of the contractor which are directly pertinent to that specific contract for the purpose of making audit, examination, excerpts, and transcriptions.

4. Administrative, contractual, or legal remedies in instances where contractors/vendors violate or breach contract terms, and the sanctions and penalties that are appropriate.
5. Termination for cause and for convenience by the Charter School, including the manner by which it will be effected and the basis for settlement.

XIII. Maintenance of Records

The Charter School shall document specific actions for any procurement. These specific actions include, but are not limited to:

1. The rationale for the method of procurement.
2. The selection of contract type.
3. The selection or rejection of a contractor/vendor, and supporting rationale.
4. The basis for a contract price.

Documentation of each of these actions shall be prepared as the actions occur within any given instance of procurement.

Procurement records, accepted bid documents, and selected contracts will be retained by the Charter School for not less than three (3) years.

XIV. Conflict of Interest

No Board member or Charter School employee shall be financially interested in any contract made by the Board or in any contract made in their capacity as a Board member or Charter School employee.

No Board member or Charter School employee shall participate in the selection, award, or administration of a contract if a real or apparent conflict of interest would be involved. Such a conflict would arise when the Board member or Charter School employee, or any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ the Board member or Charter School employee, has a financial or other interest in the firm selected for an award. The Board member or Charter School employee shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements.

To the extent permitted by law, any Board member or Charter School employee who violates this section may be subject to penalties, sanctions, and other disciplinary actions.

XV. Reservation

The Charter School Procurement and Contract Bidding Policy shall be amended and updated if necessary to comply with changes in acceptable procurement practices.

XVI. Federal Grants or Programs

In addition to complying with all conditions herein, all contracts involving federal grants or other federal programs shall also fully comply with all applicable federal procurement guidelines related to such programs. In the event there is a conflict between this policy and the applicable federal procurement guidelines, the federal guidelines shall prevail.

Board Policy #: 10
Adopted/Ratified: October 3, 2019
Revision Date: December 8, 2020

SECTION 10– FISCAL – GIFT ACCEPTANCE

The purpose of the Donation Acceptance Policy is to delineate policies and guidelines governing the acceptance of donations by Compass Charter Schools, and to provide guidance to prospective donors relating to potential donations to the organization.

Although we appreciate any donor who is interested in donating to our organization, Compass Charter Schools will not engage in any of the following donation acceptance practices:

- Accepting any donation that violates federal, state or municipal laws;
- Accepting donations that require Compass Charter Schools to provide special consideration or treatment to any individual, donor, entity, etc.;
- Accepting donations that require the Compass Charter Schools to deviate from its normal hiring, promotion or contracting procedures;
- Accepting personal gifts in any cash amount, including gift certificates, coupons, entertainment tickets or the like; and
- Accepting donations from organizations whose mission or core activities may be in direct conflict with the mission of Compass Charter Schools or which may limit its ability to perform its functions as a California nonprofit public benefit corporation creating managing, operating, guiding, directing and promoting one or more California public charter schools.

Additionally, restricted gifts – gifts that are for a specific purpose – may be accepted into the general fund of Compass if the expenditure of such a gift complies with the legal use of public funds. Compass may open a separate bank account and keep separate funds outside the general fund for monies that are donated for purposes outside the Compass budget. For instance, the Board, in partnership with the Parent Advisory Council, may open a separate bank account and keep funds separate that are donated specifically for college scholarships for graduating Compass seniors. Any such fund shall be the ultimate responsibility of the Board of Directors.

The Superintendent & CEO will consult with the Board of Directors regarding all donations prior to acceptance. With that said, Compass Charter Schools respectfully reserves the right to refuse any donation it believes is not in the best interest of the organization. Additionally, Compass Charter Schools employees may not accept any donations on behalf of Compass Charter Schools without the prior consent of the Superintendent & CEO and Board of Directors.

All donations must be accepted by the Board of Directors at a regularly scheduled Board meeting.

Board Policy #: 11
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 11 – FISCAL – FUNDRAISING

Compass Charter Schools ("CCS" or the "Charter School") recognizes a desire and a need for fundraising. CCS also recognizes a need for restraint to prevent fundraising activities from becoming too numerous and overly demanding on employees, scholars, and the general public. The dedication and fundraising efforts of our parent community strengthen the ties which make us a caring place where the learning, success, and development of all scholars are deeply valued. CCS Governing Board (the "Board") has the responsibility to monitor, supervise, and control all fundraising activities on campus and associated with official Charter School programs and activities. All fundraising activities must have prior written approval from the Board.

The Charter School Fundraising Policy stems from the following principles:

- Fundraising should be consistent with the mission and values of the CCS charter.
- Fundraising events should help develop and enrich the CCS community.
- Fundraisers should promote multiculturalism by including and incorporating a variety of cultural activities designed to appeal to diverse populations in the larger community.
- Fundraisers should promote scholars who are active in their learning, aware of their interests, and who seek to expand and explore their knowledge through dynamic collaboration with peers and teachers within an academic setting and the larger community.
- Fundraisers should promote and support education in science, math, humanities, and the arts.
- Fundraisers should reflect a positive image of CCS and should provide public relations in the community consistent with the CCS's mission and values.

The Charter School Fundraising Policy strives to <u>avoid</u>:

- Partnerships with businesses or organizations that make a profit from fundraisers but do not share the philosophy and values of CCS.
- The promotion of excessive consumerism, marketing, advertising, or selling commercial products or services.
- Scholars doing door-to-door canvassing of any kind.
- The sale of junk foods, packaged sweets, sodas or other unhealthy products that are inconsistent with CCS's School Wellness Policy. In general, fundraiser foods or beverages may not be sold on the Charter School campus during the school day or within 30 minutes after the end of the official school day.
- Raising funds from or promoting any religious products, events or holidays.

The Superintendent & CEO will ascertain that all fundraising events and activities are legal, all necessary permits are obtained, and the site, equipment, and activities are safe and accessible for all participants. Trash and recycling containers should be provided at all fundraising events.

Notice of fundraising events and activities should be disseminated electronically and/or posted in

central locations at the school. The Superintendent & CEO or designee shall approve all flyers and notices promoting fundraising events prior to distribution.

Voluntary Participation

All scholar and parent participation in CCS fundraising activities is voluntary. Participation in fundraising activities is not required for any scholar's participation in any educational activity or program. Further, CCS will not discriminate against a scholar in any way based on whether or not a scholar or his/her family participated in fundraising activities or contributed time or money to CCS. **However, scholars may be provided prizes or other recognition for voluntarily participating in fundraising activities.** Complaints regarding noncompliance with California Education Code sections 49010 *et seq*. may be filed under the Charter School's Uniform Complaint Procedures.

Corporate/Business Sponsorships and Donations

In recognition of the need to raise funds from additional sources, the Board will gratefully accept donations (actual and in-kind) to support CCS's programs and operations in accordance with the law and CCS policy.

Only those corporations and businesses whose products, services, and stances are in alignment with and share CCS's mission and philosophy will be accepted, at the discretion of the Board. Acceptance of such donations does not constitute endorsement of the business or sponsor and will be subject to the following terms:

In determining whether to accept gifts, donations and grants, the Board will consider the following:

- Items needed by CCS.
- Additional costs to CCS.
- Whether acceptance of the gift, donation, or grant is consistent with CCS fiscal policies including conflict of interest code.

Based on these and other factors identified, the Board may accept the proposed gift, donation, sponsorship, or grant.

Board Policy #: 12
Adopted/Ratified: October 3, 2019
Revision Date: March 22, 2020, March 28, 2021, June 21, 2021

SECTION 12 – STAFF HANDBOOK

The CCS Staff Handbook, which is separately approved annually, shall be included here as a Board Policy.

Board Policy #: 13
Adopted/Ratified: October 3, 2019
Revision Date: March 22, 2020, March 28, 2021, July 31, 2021

SECTION 13 – CURRICULUM - INDEPENDENT STUDY BOARD POLICIES

Compass Charter Schools (the "Charter School") shall offer independent study to meet the educational needs of pupils enrolled in the Charter School. Independent study is an optional educational alternative in which no pupil may be required to participate and is designed to teach the knowledge and skills of the core curriculum. The Charter School shall provide appropriate existing services and resources to enable pupils to complete their independent study successfully. The following written policies have been adopted by the Compass Charter Schools Board of Directors for implementation at the Charter School:

1. For pupils in all grade levels and programs offered by the Charter School, the maximum length of time that may elapse between the time an assignment is made and the date by which the pupil must complete the assigned work shall be five (5) school days.

2. The Superintendent or designee shall conduct an evaluation to determine whether it is in the best interests of the pupil to remain in independent study upon the following triggers:

    a. When any pupil fails to complete five (5) assignments during any period of five (5) school days.
    b. In the event Scholar's educational progress falls below satisfactory levels as determined by the Charter School's Scholar Success Team Policy and Missed Assignment Policy which considers ALL of the following indicators:
        i. The pupil's achievement and engagement in the independent study program, as indicated by the pupil's performance on applicable pupil-level measures of pupil achievement and pupil engagement set forth in Education Code Section 52060(d) paragraphs (4) and (5).
        ii. The completion of assignments, assessments, or other indicators that evidence that the pupil is working on assignments.
        iii. Learning required concepts, as determined by the supervising teacher.
        iv. Progressing toward successful completion of the course of study or individual course, as determined by the supervising teacher.
        v. The Charter School may also consider the following in determining satisfactory progress:
            1. The required diagnostic assessment which is administered three times per year; or
            2. Scholars' semester grades as determined by the supervising teacher; or
            3. Data gathered during monthly Connections Meetings.

3. The Charter School shall provide content aligned to grade level standards that is provided at a level of quality and intellectual challenge substantially equivalent to in-person instruction. For high school grade levels this shall include access to all courses offered by the Charter School for graduation and approved by the UC or CSU as credible under the A-G admissions criteria.

4. The Charter School has adopted tiered reengagement strategies for all pupils who are not generating attendance for more than three (3) school days or 60% of the instructional days in a school week, or who are in violation of the written agreement pursuant to Education Code Section 51747(g). These procedures are as follow:

    a. Verification of current contact information for each enrolled pupil;
    b. Notification to parents or guardians of lack of participation within one (1) school day of the absence or lack of participation;
    c. Outreach from the Charter School to determine pupil needs including connection with health and social services as necessary;
    d. When the evaluation described above under paragraph 2.b.iv. is triggered to consider whether remaining in independent study is in the best interest of the pupil, a pupil-parent-education conference shall be required to review a pupil's written agreement and reconsider the independent study program's impact on the pupil's achievement and well-being. This conference shall be a meeting involving, at a minimum, all parties who signed the pupil's written independent study agreement.

5. The following plan shall be in place in accordance with Education Code Section 51747(e) for synchronous instruction and live interaction:

    a. For pupils in transitional kindergarten through grade 3, inclusive, the plan to provide opportunities for daily synchronous instruction for all pupils throughout the school year by each pupil's assigned supervising teacher shall be as follows:
        i. Each supervising teacher will provide daily synchronous instruction via an online videoconferencing platform wherein scholars will have the opportunity to participate in daily lessons and learning activities with similar aged peers.
        ii. Daily synchronous instruction shall be approximately 30 minutes per day, but may be longer or shorter in duration at the discretion of the supervising teacher.
        iii. The schedule for daily synchronous instruction will be communicated to scholars and their families via ParentSquare and/or Google calendar. Scholars shall be required to utilize their Compass Google accounts to access daily synchronous instruction.
    b. For pupils in grades 4-8, inclusive, the plan to provide opportunities for daily live interaction between the pupil and a certificated or non-certificated employee of the Charter School and at least weekly synchronous instruction for all pupils throughout the school year by each pupil's assigned supervising teacher shall be as follows:
        i. Each supervising teacher will provide weekly synchronous instruction via an online videoconferencing platform wherein scholars will have the opportunity to participate in weekly lessons and learning activities with similar aged peers.
        ii. Weekly synchronous instruction shall be approximately 30 minutes per week, but may be longer or shorter in duration at the discretion of the supervising teacher.

iii. The schedule for weekly synchronous instruction will be communicated to scholars and their families via ParentSquare and/or Google calendar. Scholars shall be required to utilize their Compass Google accounts to access weekly synchronous instruction.
iv. Daily live interaction shall be available to all scholars in grades 4-8 through a schedule of social and academic programs published via ParentSquare and/or Google calendar. Scholars shall be required to utilize their Compass Google accounts to access daily live interactions.

c. For pupils in grades 9-12, inclusive, the plan to provide opportunities for at least weekly synchronous instruction for all pupils throughout the school year by each pupil's assigned supervising teacher shall be as follows:
   i. Each supervising teacher will provide weekly synchronous instruction via an online videoconferencing platform wherein scholars will have the opportunity to participate in weekly lessons and learning activities with similar aged peers.
   ii. Weekly synchronous instruction shall be approximately 30 minutes per week, but may be longer or shorter in duration at the discretion of the supervising teacher.
   iii. The schedule for weekly synchronous instruction will be communicated to scholars and their families via ParentSquare and/or Google calendar. Scholars shall be required to utilize their Compass Google accounts to access weekly synchronous instruction.

6. The following plan shall be utilized to transition pupils whose families wish to return to in-person instruction from independent study expeditiously, and, in no case, later than five instructional days:

   a. Upon written receipt of a family's wish to return to in-person instruction, the Charter School staff shall inform the family of their right to return to their district of residence for in-person instruction because the Charter School does not offer an in-person instruction option.
   b. If the family specifically requests additional in-person options, the Charter School will provide a list of recommended alternatives based on the scholar's current address of residence. Parents may also visit https://www.greatschools.org/ to locate additional school options in their area.
   c. The Charter School shall not have any obligation to assist the family with enrollment in a school district or another charter school, nor can the Charter School guarantee enrollment availability in any school.

7. A current written agreement shall be maintained on file for each independent study pupil, including but not limited to, all of the following:

   a. The manner, time, frequency, and place for submitting a pupil's assignments and for reporting the pupil's progress.
   b. The objectives and methods of study for the pupil's work, and the methods utilized to evaluate that work.
   c. The specific resources, including materials and personnel, that will be made available to the pupil. These resources shall include confirming or providing

access to all pupils to connectivity and devices adequate to participate in the educational program and complete assigned work.

d. A statement of the policies adopted herein, pursuant to Education Code Section 51747(a) and (b) regarding the maximum length of time allowed between the assignment and the completion of a pupil's assigned work, and the level of satisfactory educational progress, and the number of missed assignments allowed before an evaluation of whether or not the pupil should be allowed to continue in independent study.
e. The duration of the independent study agreement, including beginning and ending dates for the pupil's participation in independent study under the agreement. No independent study agreement shall be valid for any period longer than one school year.
f. A statement of the number of course credits or, for the elementary grades, other measures of academic accomplishment appropriate to the agreement, to be earned by the pupil upon completion.
g. A statement detailing the academic and other supports that will be provided to address the needs of pupils who are not performing at grade level, or need support in other areas, such as English learners, individuals with exceptional needs in order to be consistent with the pupil's individualized education program or plan pursuant to Section 504 of the federal Rehabilitation Act of 1973 (29 U.S.C. Sec. 794), pupils in foster care or experiencing homelessness, and pupils requiring mental health supports.
h. The inclusion of a statement in each independent study agreement that independent study is an optional educational alternative in which no pupil may be required to participate. In the case of a pupil who is referred or assigned to any school, class or program pursuant to Education Code sections 48915 or 48917, the agreement also shall include the statement that instruction may be provided to the pupil through independent study only if the pupil is offered the alternative of classroom instruction.
i. Each written agreement shall be signed, prior to the commencement of independent study, by the pupil, the pupil's parent, legal guardian, or care giver, if the pupil is less than 18 years of age, the certificated employee who has been designated as having responsibility for the general supervision of independent study, and all persons who have direct responsibility for providing assistance to the pupil. For purposes of this paragraph "caregiver" means a person who has met the requirements Family Code section 6550.

8. The Charter School shall comply with the Education Code sections 51745 through 51749.3 and the provisions of the Charter Schools Act of 1992 and the State Board of Education regulations adopted there under.

9. The Superintendent & CEO shall establish regulations to implement these policies in accordance with the law.

Board Policy #: 14
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 14 – CURRICULUM - SCHOOL CALENDAR

When drafting the school calendar for each track, as applicable, the Superintendent & CEO, or designee, shall attempt to maximize the number of school days and promote high attendance levels. The school calendar for each track, as applicable, shall also reflect any commitments made in the charter petitions and any Memoranda of Understanding with any authorizer.

The Superintendent & CEO, or designee, shall annually present the proposed school calendar for each track, as applicable, for the following school year to the Board at its first meeting in January.

The school calendar for each track, as applicable, shall comply with all applicable legal requirements, including meeting the minimum number of required school days for charter schools, and shall, to the greatest extent possible, meet the needs of the community, scholars, staff and parents/guardians. The school calendar for each track, as applicable, shall indicate the beginning and end-of-school dates, regular school days, number of instructional days, professional development, legal holidays, vacation periods, and other pertinent dates.

Board Policy #: 15
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 15 – CURRICULUM - CURRICULUM ASSESSMENT

The Board recognizes that it is accountable to the scholars, parents/guardians and community for conducting ongoing evaluation of the curriculum and educational program of Compass Charter Schools. Appropriate means for continuing evaluation of the entire educational program shall be established.

The Superintendent & CEO, or designee, shall review the effectiveness of the curriculum in meeting Compass Charter Schools' educational program needs and goals at least annually. Based on these reports, the Board shall take appropriate actions to maintain the effectiveness of programs and to improve the quality of education delivered by Compass Charter Schools.

Elements of the Superintendent & CEO's reports may include the following:

1. Test results, surveys, inventories, checklists, and other indicators of scholar behavior;
2. Information regarding scholar behavior as assessed by teachers, peers, or the scholar himself/herself;
3. Descriptions of experiences implemented for scholars that are designed to bring about the desired outcomes;
4. Test results, measurements and observations related to the learning experience described in number 3, above;
5. Comparisons of outcomes with objectives;
6. Comparison of Compass Charter Schools curriculum with the applicable state standards;
7. Results from all state mandated assessments and any internal assessments; and/or
8. Scholar writing samples and end-of-course grades.

Each year, in addition to the regular reports described above, the Superintendent & CEO, or designee, shall provide the Board with a year-end report so the Board can determine the extent to which Compass Charter Schools has accomplished or made significant progress toward achieving its professional development and educational goals.

Board Policy #: 16
Adopted/Ratified: October 3, 2019
Revision Date: September 27, 2020, August 11, 2021

SECTION 16 – CURRICULUM - CONCURRENT ENROLLMENT POLICY

Concurrent enrollment in another public or private K-12 school is prohibited at Compass Charter Schools ("CCS" or "the Charter School). If a student (also referred to as a scholar) is found to be enrolled in two (2) schools, CCS will notify the scholar's parents/guardians (also referred to as a Learning Coach) to clarify enrollment at CCS. If the scholar maintains concurrent enrollment, the scholar will be withdrawn from CCS in accordance with CCS's board approved involuntary removal procedures.

Community College Courses

It is the policy of the CCS Board of Directors to support the concurrent enrollment of scholars in advanced scholastic or vocational education coursework at local community colleges. Scholars who wish to concurrently enroll in a community college must follow the requirements and procedures below.

Requirements:

- Scholars who have completed 9th grade are eligible for concurrent enrollment. Exceptions may be granted under special circumstances.
- Scholars must be in good academic standing at CCS and may not be considered truant.
- Scholars must meet the GPA, course, and age requirements for the college course(s) they wish to attend (this will vary by community college).
- Courses taken for dual credit are taken in addition to the scholar's required course schedule at CCS.

Procedure:

- Scholars must notify the College & Career Readiness Counselor prior to enrolling in a college level course for dual credit purposes. Failure to do so will prevent scholars from receiving dual credit.
- Scholars must complete a Concurrent Enrollment Request Form, including a parent/guardian signature, and submit the form to the College & Career Readiness Counselor.
- The College & Career Readiness Counselor will determine if the scholar meets all requirements as described above. Upon recommendation by the College & Career Readiness Counselor, the Director of Counseling Services will make the final approval for concurrent enrollment.
- If the Director of Counseling Services denies the request for concurrent enrollment, the scholar may appeal the decision to the Assistant Superintendent & Chief Academic Officer. If the Assistant Superintendent & Chief Academic Officer denied the request, a final appeal may be heard by the governing board of CCS. The decision of the Board will be final.

Limitations:

- Initially, a scholar will be approved to take no more than two (2) community college courses at one time, in addition to the scholar's CCS course(s).

- If the scholar successfully completes the initial course(s) with a 2.0 GPA or better and satisfactory attendance at CCS, the scholar will be eligible for another semester of concurrent/dual credit the following semester following the notification steps above.
- Eligibility for additional courses will also be determined based on scholar performance and the policies of the community college they are attending.

Credit for Community College Courses:

- Scholars are responsible for providing an official transcript from the community college verifying the grade earned at the conclusion of the college course. This information must be submitted to the CCS Records Department at the close of the college semester. Scholars are responsible for submitting the college transcript within the prescribed timelines in order for the college course to appear on the high school transcript. Submit college transcript to:

Compass Charter Schools
Attn: Records Department
850 Hampshire Road, Suite R
Thousand Oaks, CA 91361

- Credit will be granted for college level coursework depending on the community college units earned for each college course. Ten (10) high school credits will be awarded upon successful completion of each college course(s) with three (3) units or more unless scholar has elected to complete the course(s) for college credit only. If a scholar enrolls in a course for less than 3 units, HS dual credit amount will be determined based upon course evaluation from the College & Career Readiness Counselor. No dual credit is awarded for community college courses that are one (1) unit or less.
- Scholars will receive the same letter grade for the high school credit as is granted by the college. Dual credit courses will be calculated as a part of the scholar's regular GPA. College level courses will not be weighted for the purpose of appearing on the high school transcript and will be graded on a "4.0 - A scale". College courses will not carry weighted grade credit on the high school transcript.
- Colleges and Universities have their own policies regarding acceptance of dual credit. It is the parent's/scholar's responsibility to check with the university regarding acceptance of dual credit.
- All course(s) taken at the community college will appear on the scholar's official college credit transcript.

Costs and Fees:

- Any participation in community college courses is voluntary and is not required as part of CCS's educational program.
- Charter schools, school districts and county offices of education shall not expend funds for courses or instruction offered by private or public colleges or universities beyond that permitted in pursuit of a high school diploma.
- Parents/scholars are responsible for the cost of fees and course materials. This includes fees, textbooks and other instructional materials required for the course.
- Exception: fees and materials will be paid by CCS if:
  - The course is an elective course not offered by CCS and/or
  - The scholar qualifies for free or reduced price lunch.

Board Policy #: 17
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 17 – SCHOOL SAFETY - INJURY AND ILLNESS PREVENTION PROGRAM GUIDANCE

The Injury and Illness Prevention Program, which is separately approved annually, shall be included here as a Board Policy.

Board Policy #: 18
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 18 – SCHOOL SAFETY - SCHOOL SAFETY PLAN

The School Safety Plan, which is separately approved annually, shall be included here as a Board Policy.

Board Policy #: 19
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 19 – SCHOLAR POLICY – SCHOLAR HANDBOOKS

The Scholar Handbooks, which are separately approved annually, shall be included here as Board Policies.

Board Policy #: 20
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 20 – SCHOLAR POLICY – IMMUNIZATION POLICY

Compass Charter Schools ("CCS" or the "Charter School") will adhere to all laws related to legally required immunizations for entering students (also known as a scholars) pursuant to Health and Safety Code Sections 120325-120380, and Title 17, California Code of Regulations Sections 6000-6075.

Required Immunizations, Records and Reports
California law requires that an immunization record be presented to CCS staff before a child can be unconditionally enrolled in school. CCS requires written verification from a doctor or immunization clinic of the following immunizations:

Entering scholars who are not exempt will need the following immunization requirements:

Immunization	Dosage
Diphtheria, Pertussis, and Tetanus (DTaP)	Five (5) doses
Polio	Four (4) doses
Measles, Mumps, and Rubella (MMR)	Two (2) doses
Hepatitis B (Hep B)	Three (3) doses
Varicella (chickenpox)	Two (2) doses

NOTE: Four doses of DTaP are allowed if one was given on or after the fourth birthday. Three doses meet the requirement if at least one dose of Tdap, DTaP, or DTP vaccine was given on or after the seventh birthday (also meets the 7th-12th grade Tdap requirement). One or two doses of Td vaccine given on or after the seventh birthday count towards the requirement. Three doses of Polio are allowed if one was given on or after fourth birthday. MMR doses must be given on or after first birthday. Two doses of measles, two doses of mumps, and one dose of rubella vaccine meet the requirement, separately or combined. Combination vaccines (e.g., MMRV) meet the requirements for individual component vaccines.

Scholars entering 7th grade who are not exempt from the immunization requirements must show proof of the following immunizations:

Immunization	Dosage
Tetanus, reduced Diphtheria, and acellular Pertussis (Tdap)	One (1) dose

Additionally, scholars who are not exempt from the immunization requirements must show proof

of the following immunizations when advancing to the 7th grade:

Immunization	Dosage
Varicella	Two (2) Doses

NOTE: In order to begin 7th grade, scholars who had a valid personal belief exemption on file with a public or private elementary or secondary school in California before January 1, 2016 must meet all requirements for children 7-17 years old (i.e., polio, MMR, chickenpox/varicella and primary series for diphtheria, tetanus, and pertussis), **in addition to** the 7th grade requirements for Tdap and two (2) doses of Varicella (varicella requirement for seventh grade advancement expires after June 25, 2025).

Verification of immunizations will be completed with written medical records from the child's doctor or immunization clinic. Immunization records shall be part of the mandatory permanent pupil record and shall be kept in accordance with CCS's Educational Records and Scholar Information Policy. CCS will file a written report on the immunization status of all new entrants to CCS with the California Department of Public Health, on at least an annual basis, as required by law.

Any scholar leaving the United States for a short vacation to or long stay in any country considered by the Center of Disease Control and Prevention ("CDC") to have increased risk of TB exposure MUST contact the County Tuberculosis Clinic for a TB Screening upon return.

CCS shall immediately admit a foster child, as defined in Education Code § 48853.5(a), and a homeless child, as defined in Section 11434a(2) of Title 42 of the United States Code, even if the foster or homeless school's immunization records are not available or are missing. However, this does not alter CCS's obligation to obtain immunization records for foster and homeless scholars or to ensure the full immunization of foster and homeless scholars as required by law.

If CCS discovers that an admitted scholar who was previously believed to be in compliance with the immunization requirements is subsequently discovered to not be in compliance with either the unconditional admission requirements or the conditional admission requirements, CCS will notify the scholar's parent/guardian (also known as the Learning Coach) of: 1) the time period within which the doses must be received, which may be no more than ten (10) school days after notification; and 2) that the scholar shall continue in attendance only if the parent/guardian provides documentation that the immunization requirements have been met within the time period designated by the Charter School.(). If, within ten (10) school days of the notice, the child does not provide documentation of having received all required immunizations, CCS shall exclude this scholar from attendance. The scholar shall remain excluded from the CCS's campuses until the scholar is fully immunized as required by law. The scholar shall also be reported to the School Registrar.

The Superintendent & CEO, or designee, may arrange for a licensed physician or a qualified registered nurse to administer immunizations at CCS to any scholar whose Learning Coach has consented in writing.

Conditional Admittance

Scholars may be conditionally admitted in accordance with Health and Safety Code Section 120340 and Title 17, California Code of Regulations Section 6035. The Superintendent & CEO

or designee shall notify the scholar's Learning Coach of the date(s) by which the scholar must complete all the remaining doses. The Superintendent & CEO or designee shall review the immunization record of each scholar admitted conditionally at least every thirty (30) days from the date of admission until that scholar has received all the required immunizations or submitted an exemption. If a scholar conditionally admitted fails to fulfill the conditions of admission, CCS will prohibit the scholar from further attendance until that scholar has been fully immunized as required by law.

Documentary Proof

The Superintendent & CEO shall maintain the scholar's immunization information in the scholar's mandatory permanent record and shall file annual immunization status reports as required by the California Department of Public Health.

Exemptions from Immunization Requirements

All scholars must be fully immunized in accordance with the California Health and Safety Code and the California Code of Regulations and this Policy with the following exceptions:

1. Scholars who show proof of a medical exemption by a physician licensed to practice medicine in California pursuant to Health and Safety Code Section 120370.
    a. Commencing January 1, 2021, the California Department of Public Health standardized medical exemption form shall be the only documentation of a medical exemption that the Charter School shall accept.
    b. On and after July 1, 2021, the Charter School shall not unconditionally admit or readmit, or admit or advance any scholar to 7th grade, unless the scholar has been fully immunized or files a California Department of Public Health standardized medical exemption form as required by law.
    c. Medical exemptions issued before January 1, 2020 will continue to remain valid until the child enrolls in the next grade span, defined below.
2. Scholars who are enrolled in a home-based private school or independent study program and do not receive any classroom-based instruction.
    a. A scholar who has not received all of the required immunizations will not be eligible to attend classes at a Charter School resource center unless the scholar is otherwise exempt under #1 or #3.
3. Scholars who, prior to January 1, 2016, submitted a letter or affidavit on file at a private or public elementary or secondary school in California stating beliefs opposed to immunization, and who provides said letter or affidavit to the CCS, shall be allowed to enroll at the CCS without being fully immunized until the scholar enrolls in the next grade span pursuant to Health and Safety Code Section 120335(g);
    a. "Grade span" means each of the following:
        1. Birth to Preschool.
        2. Kindergarten and grades 1 to 6, inclusive, including transitional kindergarten.
        3. Grades 7 to 12, inclusive.

If there is good cause to believe that a child has been exposed to a disease listed in subdivision (b) of Section 120335 and his or her documentary proof of immunization status does not show

proof of immunization against that disease, that child may be temporarily excluded from the School until the local health officer is satisfied that the child is no longer at risk of developing or transmitting the disease.

This Policy does not prohibit a pupil who qualifies for an individualized education program ("IEP"), pursuant to federal law and Education Code Section 56026, from accessing any special education and related services required by the scholar's individualized education program.

Board Policy #: 21
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 21 – SCHOLAR POLICY - WORK AND ENTERTAINMENT PERMIT POLICY

Work Permits

Students (also referred to as scholars) under the age of 18 must obtain a work permit from Compass Charter Schools ("CCS" or the "Charter School") after securing an opportunity for employment.

To be eligible for a work permit, a scholar must satisfy the following requirements:

- A scholar must maintain a minimum of 2.0 grade point average ("GPA") each semester to be eligible.
- Maintain adequate school attendance.

Steps to request a work permit:

- The scholar, after obtaining a promise of employment, shall download and print the "*Statement of Intent to Employ a Minor and Request Work Permit-Certificate of Age*" which is available from the California State Department of Education website here: https://www.cde.ca.gov/ci/ct/we/workpermitsforscholars.asp The scholar must complete the Minor's Information" section of the application.
- The scholar will request the potential employer to complete the "*To be filled in and signed by employer*" section of the application and sign the application, which indicates the employer has "*worker compensation*" insurance and list hours of work for the scholar.
- The scholar will obtain the signature of a parent or guardian (also referred to as the Learning Coach) where designated.
- The scholar will submit the work permit application to the CCS College & Career Readiness Counselor.

Upon receipt of the required "*Statement of Intent to Employ a Minor and Request for a Work Permit- Certificate of Age*," CCS will review the scholar's request and confirm that the scholar is in good standing. CCS may issue a work permit or deny the request in its sole discretion.

Limitations:

- A permit may be issued to any scholar between the ages of 12 and 18 years for employment on regular school holidays, school vacation, or if the scholar is otherwise exempt from compulsory school attendance.
- Except as permitted by law, a scholar who is 14 or 15 years of age may not be employed for more than three (3) hours on any day in which school is in session, and no more than eighteen (18) hours in any week.
- Except as permitted by law, a scholar who is 16 or 17 years of may not be employed for more than four (4) hours on any day that school is in session, or for no more than eight (8) hours on any school day that immediately precedes a non-school day.

- CCS may, in its discretion, may impose additional restrictions on the maximum number of hours a scholar may work per day or per week, as CCS determines is necessary to serve the scholar's best interests.
- A permit may not be issued for employment in any occupation that is dangerous to the life or limb, or injurious to the health or morals of the minor. CCS has the sole discretion to determine the character of the proposed employment.

The following scholars **do not** need a work permit:

- High School graduate, regardless of age.
- Scholar who passed the California High School Proficiency Examination.
- Scholars who have been awarded a certificate of equivalency ("GED")
- Scholar who is 18 years of age or older.
- Scholars who are working as an unpaid trainee, volunteer, or scholar.
- Scholars whose employment is within one (or more) of the following types:
    - Private homes doing occasional odd jobs (e.g. babysitting, lawn mowing etc.)
    - Employment by a government agency
    - Self-employment
    - Delivery of newspapers to consumers
    - Agricultural or domestic work on property owned, operated, or controlled by minor's parents. Please notes that Scholars must obtain a work permit for any other family employment. Parents or family may not employ a Scholar for any task otherwise not permitted by law.

Renewals:

- Work permit will expire no later than the end of the current school year.
- Scholar must email the College & Career Readiness Counselor five (5) business days before expiration date to renew work permit.
- Scholar must complete a separate work permit for each employer.

Please allow five (5) business days to process the work permit application. Incomplete forms will not be processed.

<u>Entertainment Work Permits</u>
A parent or guardian of a minor needing a 6-month entertainment work permit may request a form to be completed by the College & Career Readiness Counselor. A scholar must be in good academic standing to be eligible for this permit.

Entertainment permit renewal:

- This permit is renewable every six (6) months while a minor is under 18 years old. First time and renewal applications for school-age children must be accompanied by an approval from the Charter School on the form which will be provided after the application is completed.

- Follow this link to access an entertainment application: https://www.dir.ca.gov/dlse/Application_for_Entertainment_Work_Permit_for_Minor.htm

Completing entertainment permit application:

- Learning Coach completes form with scholar information
- Email form to College & Career Readiness Counselor. Charter School will complete the "*School Record*" portion of the form in original ink and mail the form to scholar's home address. No fax or photocopies permitted. It will take approximately 3 -5 business days for the form to arrive by mail.

Board Policy #: 22
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 22 – SCHOLAR POLICY – SUICIDE PREVENTION POLICY

The Board of Directors of Compass Charter Schools recognizes that suicide is a leading cause of death among youth and should be taken seriously. To attempt to reduce suicidal ideation and behavior, and its impact on scholars and families, CCS has developed measures and strategies for suicide prevention, intervention, and postvention. This policy shall be reviewed and revised as indicated, at least annually.

In compliance with Education Code section 215, this policy has been developed in consultation with CCS and community stakeholders, school-employed mental health professionals (e.g school counselors, psychologists, social workers, nurses), administrators, other staff members, learning coaches, scholars, local health agencies, mental health agencies and professionals, the county mental health plan, law enforcement, and community organizations in planning, implementing, and evaluating CCS' strategies for suicide prevention and intervention. CCS must work in conjunction with local government agencies, community-based organizations, and other community supports to identify additional resources.

Prevention and Instruction
Suicide prevention strategies may include, but not be limited to, efforts to promote a positive school climate that enhances scholars' feelings of connectedness with CCS and is characterized by caring staff and harmonious interrelationships among scholars.

CCS's instructional and scholar support program shall promote the healthy mental, emotional, and social development of scholars including, but not limited to, the development of problem-solving skills, coping skills, and resilience.

The Superintendent & CEO or designee may offer learning coaches education or information which describes the severity of the youth suicide problem, CCS's suicide prevention efforts, risk factors and warning signs of suicide, basic steps for helping suicidal youth, reducing the stigma of mental illness, and/or CCS and community resources that can help youth in crisis.

CCS's instructional curriculum may include information about suicide prevention, as appropriate or needed, taking into consideration the grade level and age of the scholars. If offered or included in CCS's instructional curriculum, suicide prevention instruction shall be designed to help scholars:

1. Identify and analyze signs of depression and self-destructive behaviors and understand how feelings of depression, loss, isolation, inadequacy, and anxiety can lead to thoughts of suicide.
2. Identify alternatives to suicide and develop coping, self-esteem, and resiliency skills.
3. Learn to listen, be honest, share feelings, and get help when communicating with friends who show signs of suicidal intent.
4. Identify trusted adults, CCS resources, and/or community crisis intervention resources where youth, including those at high risk, such as youth bereaved by suicide; youth with disabilities, mental illness, or substance use disorders; youth experiencing homelessness

or in out-of-home settings such as foster care; and lesbian, gay, bisexual, transgender, or questioning youth can get help, and recognize that there is no stigma associated with seeking mental health, substance abuse, gender identity, or other support services.

To ensure the policies regarding suicide prevention are properly adopted, implemented, and updated, CCS shall appoint an individual (or team) to serve as the suicide prevention point of contact for CCS. The suicide prevention point of contact for CCS and the Superintendent & CEO shall ensure proper coordination and consultation with the county mental health plan if a referral is made for mental health or related services on behalf of a scholar who is a Medi-Cal beneficiary. This policy shall be reviewed and revised as indicated, at least annually in conjunction with the previously mentioned community stakeholders.

Staff Development

CCS along with its partners, has carefully reviewed available staff training to ensure it promotes the mental health model of suicide prevention and does not encourage the use of the stress model to explain suicide.

Training shall be provided for all school staff members. It may also be provided, when appropriate, for other adults on campus (such as substitutes and intermittent staff, volunteers, interns, tutors, coaches, and afterschool staff). Training shall include the following:

1. All suicide prevention trainings shall be offered under the direction of mental health professionals (e.g., school counselors, school psychologists, other public entity professionals, such as psychologists or social workers) who have received advanced training specific to suicide. Staff training may be adjusted year-to-year based on previous professional development activities and emerging best practices.
2. At least annually, all staff shall receive training on the risk factors and warning signs of suicide, suicide prevention, intervention, referral, and postvention.
3. At a minimum, all staff shall participate in training on the core components of suicide prevention (identification of suicide risk factors and warning signs, prevention, intervention, referral, and postvention) at the beginning of their employment or annually. Core components of the general suicide prevention training shall include:
    a. Suicide risk factors, warning signs, and protective factors.
    b. How to talk with a scholar about thoughts of suicide.
    c. How to respond appropriately to the youth who has suicidal thoughts. Such responses shall include constant supervision of any scholar judged to be at risk for suicide and an immediate referral for a suicide risk assessment.
    d. Emphasis on immediately referring (same day) any scholar who is identified to be at risk of suicide for assessment while staying under constant monitoring by staff member.
    e. Emphasis on reducing stigma associated with mental illness and that early prevention and intervention can drastically reduce the risk of suicide.
    f. Reviewing the data annually to look for any patterns or trends of the prevalence or occurrence of suicide ideation, attempts, or death. Data from the California School Climate, Health, and Learning Survey (Cal-SCHLS) should also be analyzed to identify school climate deficits and drive program development. See the Cal-SCHLS Web site at http://cal-schls.wested.org/.

g. Information regarding groups of scholars judged by the school, and available research, to be at elevated risk for suicide. These groups include, but are not limited to, the following:
    i. Youth affected by suicide.
    ii. Youth with a history of suicide ideation or attempts.
    iii. Youth with disabilities, mental illness, or substance abuse disorders.
    iv. Lesbian, gay, bisexual, transgender, or questioning youth.
    v. Youth experiencing homelessness or in out-of-home settings, such as foster care.
    vi. Youth who have suffered traumatic experiences.

4. In addition to initial orientations to the core components of suicide prevention, ongoing annual staff professional development for all staff may include the following components:
    a. The impact of traumatic stress on emotional and mental health.
    b. Common misconceptions about suicide.
    c. Charter School and community suicide prevention resources.
    d. Appropriate messaging about suicide (correct terminology, safe messaging guidelines).
    e. The factors associated with suicide (risk factors, warning signs, protective factors).
    f. How to identify youth who may be at risk of suicide.
    g. Appropriate ways to interact with a youth who is demonstrating emotional distress or is suicidal. Specifically, how to talk with a scholar about their thoughts of suicide and (based on CCS guidelines) how to respond to such thinking; how to talk with a scholar about thoughts of suicide and appropriately respond and provide support based on CCS guidelines.
    h. Charter School-approved procedures for responding to suicide risk (including multi-tiered systems of support and referrals). Such procedures should emphasize that the suicidal scholar should be constantly supervised until a suicide risk assessment is completed.
    i. Charter School-approved procedures for responding to the aftermath of suicidal behavior (suicidal behavior postvention).
    j. Responding after a suicide occurs (suicide postvention).
    k. Resources regarding youth suicide prevention.
    l. Emphasis on stigma reduction and the fact that early prevention and intervention can drastically reduce the risk of suicide.
    m. Emphasis that any scholar who is identified to be at risk of suicide is to be immediately referred (same day) for assessment while being constantly monitored by a staff member.

Employee Qualifications and Scope of Services

Employees of CCS must act only within the authorization and scope of their credential or license. While it is expected that school professionals are able to identify suicide risk factors and warning signs, and to prevent the immediate risk of a suicidal behavior, treatment of suicidal ideation is typically beyond the scope of services offered in the school setting. In addition, treatment of the mental health challenges often associated with suicidal thinking typically requires mental health resources beyond what schools are able to provide.

Intervention and Emergency Procedures

CCS designates the following administrators to act as the primary and secondary suicide prevention liaisons:

1. Director of Counseling Services
2. School counselor

Whenever a staff member suspects or has knowledge of a scholar's suicidal intentions, they shall promptly notify the primary designated suicide prevention liaison. If this primary suicide prevention liaison is unavailable, the staff shall promptly notify the secondary suicide prevention liaison.

The suicide prevention liaison shall immediately notify the Superintendent & CEO or designee, who shall then notify the scholar's parent/guardian as soon as possible if appropriate and in the best interest of the scholar. Determination of notification to parents/guardians/caregivers should follow a formal initial assessment to ensure that the scholar is not endangered by parental notification.

The suicide prevention liaison shall also refer the scholar to mental health resources at CCS or in the community.

When a scholar is in imminent danger (has access to a gun, is on a rooftop, or in other unsafe conditions), a call shall be made to 911.

Scholars shall be encouraged to notify a teacher, administrator, counselor, or other adult when they are experiencing thoughts of suicide or when they suspect or have knowledge of another scholar's suicidal intentions. CCS staff should treat each report seriously, calmly, and with active listening and support. Staff should be non-judgmental to scholars and discuss with the scholar, and parent/guardian, about additional resources to support the scholar.

Every statement regarding suicidal intent shall be taken seriously. Whenever a staff member suspects or has knowledge of a scholar's suicidal intentions, he/she shall promptly notify the primary or secondary suicide prevention liaisons.

Although any personal information that a scholar discloses to a school counselor shall generally not be revealed, released, referenced, or discussed with third parties, the School counselor and Director of Counseling Services shall report to the scholar's learning coach (parents/guardians/caregivers) when he/she has reasonable cause to believe that disclosure is necessary to avert a clear and present danger to the health, safety, or welfare of any scholar when appropriate and in the best interest of the scholar. Determination of notification to parents/guardians/caregivers should follow a formal initial assessment to ensure that the scholar is not endangered by parental notification.

In addition, the counselor may disclose information of a personal nature to psychotherapists or other health care providers for the sole purpose of referring the scholar for treatment. The School counselor or Director of Counseling Services may also refer the scholar to mental health resources at CCS or in the community.

When a suicide attempt or threat is reported, on campus or at a school-related activity, the suicide prevention liaison shall, at a minimum:

1. Ensure the scholar's physical safety by one or more of the following, as appropriate:
    a. Securing immediate medical treatment if a suicide attempt has occurred.
    b. Securing law enforcement and/or other emergency assistance if a suicidal act is being actively threatened.
    c. Keeping the scholar under continuous adult supervision until the parent/guardian and/or appropriate support agent or agency can be contacted and has the opportunity to intervene.
    d. Remaining calm, keeping in mind the scholar is overwhelmed, confused, and emotionally distressed.
    e. Moving all other scholars out of the immediate area.
    f. Not sending the scholar away or leaving him/her alone, even to go to the restroom.
    g. Providing comfort to the scholar, listening and allowing the scholar to talk and being comfortable with moments of silence.
    h. Promising privacy and help, but not promising confidentiality.

2. Document the incident in writing as soon as feasible.

3. Follow up with the parent/guardian and scholar in a timely manner to provide referrals to appropriate services as needed and coordinate and consult with the county mental health plan if a referral is made for mental health or related services on behalf of a scholar who is a Medi-Cal beneficiary.

4. After a referral is made, CCS shall verify with the parent/guardian that the follow up treatment has been accessed. Parents/guardians will be required to provide documentation of care for the scholar. If parents/guardians refuse or neglect to access treatment for a scholar who has been identified to be at risk for suicide or in emotional distress, the suicide prevention liaisons shall meet with the parent to identify barriers to treatment (e.g., cultural stigma, financial issues) and work to rectify the situation and build understanding of care. If follow up care is still not provided, CCS may contact Child Protective Services.

5. Provide access to counselors or other appropriate personnel to listen to and support scholars and staff who are directly or indirectly involved with the incident at CCS.

6. Provide an opportunity for all who respond to the incident to debrief, evaluate the effectiveness of the strategies used, and make recommendations for future actions.

In the event a suicide occurs or is attempted on the CCS campus, the suicide prevention liaison shall follow the crisis intervention procedures contained in CCS's safety plan. After consultation with the Superintendent & CEO or designee and the scholar's parent/guardian about facts that may be divulged in accordance with the laws governing confidentiality of scholar record information, the Superintendent & CEO or designee may provide scholars, parents/guardians, and staff with information, counseling, and/or referrals to community agencies as needed. CCS staff may receive assistance from CCS counselors or other mental health professionals in determining how best to discuss the suicide or attempted suicide with scholars.

In the event a suicide occurs or is attempted off the CCS campus and unrelated to school activities, the Superintendent & CEO or designee shall take the following steps to support the

scholar:

1. Contact the parent/guardian and offer support to the family.
2. Discuss with the family how they would like CCS to respond to the attempt while minimizing widespread rumors among teachers, staff, and scholars.
3. Obtain permission from the parent/guardian to share information to ensure the facts regarding the crisis are correct.
4. The suicide prevention liaisons shall handle any media requests.
5. Provide care and determine appropriate support to affected scholars.
6. Offer to the scholar and parent/guardian steps for re-integration to school. Re-integration may include obtaining a written release from the parent/guardian to speak with any health care providers; conferring with the scholar and parent/guardian about any specific requests on how to handle the situation; informing the scholar's teachers about possible days of absences; allowing accommodations for make-up work (being understanding that missed assignments may add stress to the scholar); appropriate staff maintaining ongoing contact with the scholar to monitor the scholar's actions and mood; and working with the parent/guardian to involve the scholar in an aftercare plan.

Supporting Scholars during or after a Mental Health Crisis

Scholars shall be encouraged through the education program and in CCS activities to notify a teacher, the Superintendent & CEO, another CCS administrator, psychologist, CCS counselor, suicide prevention liaisons, or other adult when they are experiencing thoughts of suicide or when they suspect or have knowledge of another scholar's suicidal intentions. CCS staff should treat each report seriously, calmly, and with active listening and support. Staff should be non-judgmental to scholars and discuss with the scholar, and parent/guardian, about additional resources to support the scholar.

Responding After a Suicide Death (Postvention)

A death by suicide in the school community (whether by a scholar or staff member) can have devastating consequences on the school community, including scholars and staff. CCS shall follow the below action plan for responding to a suicide death, which incorporates both immediate and long-term steps and objectives:

The suicide prevention liaison shall:

Coordinate with the Superintendent & CEO to:

1. Confirm death and cause;
2. Identify a staff member to contact the deceased's family (within 24 hours);
3. Enact the Suicide Postvention Response; and
4. Notify all staff members (ideally in-person or via phone, not via e-mail or mass notification).

Coordinate an all-staff meeting, to include:

1. Notification (if not already conducted) to staff about suicide death;
2. Emotional support and resources available to staff;
3. Notification to scholars about suicide death and the availability of support services (if this is the protocol that is decided by administration); and
4. Share information that is relevant and that which you have permission to disclose.

Prepare staff to respond to the needs of scholars regarding the following:

1. Review of protocols for referring scholars for support/assessment;
2. Talking points for staff to notify scholars; and
3. Resources available to scholars (on and off campus).

Identify scholars significantly affected by suicide death and other scholars at risk of imitative

behavior.
Identify scholars affected by suicide death but not at risk of imitative behavior.
Communicate with the larger school community about the suicide death.
Consider funeral arrangements for family and school community.
Respond to memorial requests in respectful and non-harmful manner; responses should be handled in a thoughtful way and their impact on other scholars should be considered.
Identify media spokesperson if needed.
Include long-term suicide postvention responses:

1. Consider important dates (i.e., anniversary of death, deceased birthday, graduation, or other significant event) and how these will be addressed
2. Support siblings, close friends, teachers, and/or scholars of deceased
3. Consider long-term memorials and how they may impact scholars who are emotionally vulnerable and at risk of suicide

Scholar Identification Cards

CCS will include the telephone number for the National Suicide Prevention Lifeline (1-800-273-8255) and the National Domestic Violence Hotline (1-800-799-7233) on all scholar identification cards. CCS will also include the number for the Crisis Text Line which can be accessed by texting HOME to 741741 and a local suicide prevention hotline on all scholar identification cards.

Board Policy #: 23
Adopted/Ratified: March 28, 2021
Revision Date: August 11, 2021

SECTION 23 – SCHOLAR POLICY – MISSED ASSIGNMENTS AND INVOLUNTARY REMOVAL POLICY

Per California Education Code section 51747, Compass Charter Schools ("CCS" or the "Charter School") maintains a board policy establishing the following the number of missed assignments that will be allowed before an evaluation is conducted to determine whether it is in the best interest of the scholar to remain in independent study:

When an Online or Options Learning Program scholar fails to complete five (5) assignments during any period of five (5) school days, the Superintendent & CEO or designee shall conduct an evaluation to determine whether it is in the best interests of the pupil to remain in independent study. An "assignment" constitutes the following: assigned schoolwork, completion of activity logs, and attendance at required meetings with the supervising teacher and other staff.

Evaluation After Missed Assignments

After reaching the number of missed assignments specified above during any period of five (5) school days, an evaluation will be conducted by the Superintendent & CEO and/or designee and supervising teacher to determine whether it is in the best interests of the scholar to remain enrolled in independent study.

The Evaluation After Missed Assignments may include but is not limited to the review of the following:

1) Attendance based on completion of assignments as quantified by the assigned supervising teacher;
2) Demonstration of skills on assignments;
3) Standardized test scores;
4) Written tests and reports if appropriate;
5) Oral or written presentations;
6) Scholar's attitude toward learning and achievement;
7) Punctual attendance at scheduled appointments;
8) Ability to meet scheduled appointments;
9) Preparedness for scheduled appointments;
10) Scholar demonstration of adequate and appropriate progress toward
11) Common Core State Standards;
12) Appropriate learning environment; and/or
13) Parent(s) ability to support scholar learning in the home.

As part of the evaluation process, the scholar, parent(s), guardian(s), or if the scholar is a foster child or youth or a homeless child or youth, the scholar's educational rights holder (all generally referred throughout as "Parent(s)") will be invited to present evidence to the individual(s) conducting the Evaluation After Missed Assignments meeting. During this meeting, the Charter School will determine whether it is in the best interest of the scholar to remain in independent study. A written record of the findings of any evaluation made pursuant to this Policy shall be

maintained in the scholar's mandatory interim record. The record shall be maintained for a period of three (3) years from the date of the evaluation and, if the scholar transfers to another California public school, the record shall be forwarded to that school.

Evaluation of Educational Progress

In the event Scholar's educational progress falls below satisfactory levels as determined by the Charter School's Scholar Success Team Policy and Missed Assignment Policy which considers ALL of the following indicators:

i. The pupil's achievement and engagement in the independent study program, as indicated by the pupil's performance on applicable pupil-level measures of pupil achievement and pupil engagement set forth in Education Code Section 52060(d) paragraphs (4) and (5).
ii. The completion of assignments, assessments, or other indicators that evidence that the pupil is working on assignments.
iii. Learning required concepts, as determined by the supervising teacher.
iv. Progressing toward successful completion of the course of study or individual course, as determined by the supervising teacher.
v. The Charter School may also consider the following in determining satisfactory progress:
    1. The required diagnostic assessment which is administered three times per year; or
    2. Scholars' semester grades as determined by the supervising teacher; or Data gathered during monthly Connections Meetings.

Tiered Reengagement Strategies and Charter School Conference

The Charter School has adopted tiered reengagement strategies for all scholars who are not generating attendance for more than three (3) school days or 60% of the instructional days in a school week, or who are in violation of the written agreement pursuant to Education Code section 51747(g).[1] These procedures are as follows:

1) Verification of current contact information for each enrolled scholar.
2) Notification to parents or guardians of lack of participation within one (1) school day of the absence or lack of participation.
3) Outreach from the Charter School to determine scholar needs including connection with health and social services as necessary.

When the Evaluation of Educational Progress described above is triggered to consider whether remaining in independent study is in the best interest of the scholar, a scholar-parent-education conference shall be required to review a scholar's written agreement and reconsider the independent study program's impact on the scholar's achievement and well-being. This conference shall be a meeting involving, at a minimum, all parties who signed the scholar's written independent study agreement.

Additional Consideration for Scholars with a Section 504 Plan or IEP

If the Charter School recommends removal from independent study as a result of the Evaluation After Missed Assignments, above, and the scholar has a Section 504 Plan or individualized

education program ("IEP"), the Charter School shall schedule an IEP meeting or Section 504 meeting (as applicable) following applicable legal timelines, to determine the following:

1) Whether the missed assignments were caused by or had a direct and substantial relationship to the scholar's disability; or

2) Whether the missed assignments were the direct result of the Charter School's failure to implement the IEP or Section 504 Plan, as applicable.

If the answer to either (1) or (2), above, is yes, then the missed assignments are a manifestation of the scholar's disability and the Charter School will follow applicable state and federal laws to ensure that the scholar is offered a free appropriate public education.

If the answer to both (1) and (2), above, is no, then the scholar may be removed from independent study consistent with this Policy.

This meeting may be combined with the Evaluation After Missed Assignments meeting, referenced above, at the discretion of the Charter School.

Notice of Decision and Opportunity to Request a Hearing Prior to Removal

Once the Evaluation is complete, if it is determined that it is not in the best interest of the scholar to remain enrolled in the independent study program, the Parent(s) shall be notified in writing of the Charter School's intent to remove the scholar as it is not in their best interest to remain in independent study. The Notice shall be in the native language of the Parent(s) and provided no less than five (5) schooldays before the effective date of scholar's removal. The Notice shall include the following:

1) The School's intent to remove the scholar as it is not in their best interest to remain in independent study.

2) The opportunity of the Parent(s) to request a hearing that follows the same procedures as the Charter School's disciplinary hearing. Parent(s) (or the scholar if over 18) must submit the request for hearing writing within five (5) calendar days from the date of the Notice.

3) If Parent(s) or scholar over 18 requests a hearing:

    a. It will be scheduled following the Charter School's expulsion hearing procedures as outlined in the Charter School's approved Charter and Suspension and Expulsion policy.
    b. The scholar shall remain enrolled and shall not be removed until the Charter School issues a final decision.
    c. If as a result of the hearing the scholar is disenrolled, notice will be sent to the scholar's last known district of residence within thirty (30) calendar days.
    d. A hearing decision not to disenroll the scholar does not prevent the Charter School from making a similar recommendation in the future should scholar truancy occur or re-occur.

4) If no hearing is requested, the scholar shall be removed from the school on the date listed on the notice.

Board Policy #: 24
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 24 – SCHOLAR POLICY – SUSPENSION AND EXPULSION POLICY AND PROCEDURES

The Suspension and Expulsion Policy and Procedures from Element X of each CCS Charter is hereby incorporated as the Suspension and Expulsion Policies and Procedures for that Charter School.

Board Policy #: 25
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 25 – SCHOLAR POLICY – EDUCATION OF HOMELESS CHILDREN AND YOUTH POLICY

The Compass Charter School's ("CCS" or the "Charter School") Board of Directors desires to ensure that homeless children and youth are provided with equal access to its educational program, have an opportunity to meet the same challenging State academic standards, are provided a free and appropriate public education, are not stigmatized or segregated on the basis of their status as homeless, and to establish safeguards that protect homeless scholars from discrimination on the basis of their homelessness.

Definition of Homeless Children and Youth

The term "homeless children and youth" means individuals who lack a fixed, regular and adequate nighttime residence and includes children and youths who (42 U.S.C. § 11434a):

1. Are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;

2. Have a primary nighttime residence that is a public or private place not designed for or ordinarily used as regular sleeping accommodations for human beings;

3. Are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and/or

4. Migratory children and unaccompanied youth (youth not in the physical custody of a parent or guardian) may be considered homeless if they meet the above definition of "homeless."

Homeless status is determined in cooperation with the parent or guardian. In the case of unaccompanied youth, status is determined by the School Liaison.

School Liaison

The Superintendent & CEO designates the following staff person as the School Liaison for homeless scholars (42 U.S.C. §§11432(g)(1)(J)(ii)):

Karla Gonzalez | McKinney-Vento Liaison
850 Hampshire Road, Suite R
Thousand Oaks, California 91361
(818) 372-0620
kgonzalez@compasscharters.org

The School Liaison shall ensure that the following requirements are fulfilled by the Charter School (42 U.S.C. § 11432(g)(6)):

1. Homeless scholars are identified by school personnel and through outreach and coordination activities with other entities and agencies.

2. Homeless scholars enroll in and have a full and equal opportunity to succeed at CCS.

3. Homeless scholars and families receive educational services for which they are eligible, including: services through Head Start programs (including Early Head Start programs) under the Head Start Act; early intervention services under part C of the Individuals with Disabilities Education Act ("IDEA"); any other preschool programs administered by CCS if any; and referrals to health care services, dental services, mental health services, substance abuse services, housing services, and other appropriate services.

4. Parents/guardians are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children.

5. Public notice of the educational rights of homeless children is disseminated at places frequented by parents or guardians of such youths, and unaccompanied youths, including schools, shelters, public libraries, and soup kitchens, and in a manner and form understandable to the parents and guardians of homeless youth and unaccompanied youth.

6. Enrollment/admissions disputes are mediated in accordance with law, CCS charter, and Board policy.

7. Parents/guardians and any unaccompanied youth are fully informed of all transportation services, as applicable.

8. School personnel providing services receive professional development and other support.

9. The School Liaison collaborates with State coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youths.

10. Unaccompanied youth are enrolled in school; have opportunities to meet the same challenging State academic standards as the State establishes for other children and youth; and are informed of their status as independent scholars and that the youths may obtain assistance from the School Liaison to receive verification of such status for the purposes of the Free Application for Federal Student Aid.

The California Department of Education publishes a list of the contact information for the Homeless Education Liaisons in the state, which is available at: https://www.cde.ca.gov/sp/hs/

Enrollment

CCS shall immediately admit/enroll the scholar for which the Charter School is a School of Origin. "School of Origin" means the school that the child or youth attended when permanently housed or the school in which the child or youth was last enrolled. CCS shall also immediately enroll a homeless youth who seeks to enroll in the Charter School, if the youth would otherwise be eligible to attend and subject to CCS's capacity and pursuant to the procedures stated in the

CCS charter and Board policy. A homeless youth who is enrolled will have the right to attend classes and participate fully in school activities, including extracurricular activities.

The youth shall be immediately enrolled even if the scholar lacks records normally required for enrollment (such as previous academic records, records of immunizations, other required health records, proof of residency) or has missed application or enrollment deadlines during any period of homelessness. Records will immediately be requested from the previous school. (42 U.S.C. § 11432(g)(3)(C); Education Code Section 48850(a)(3)(A).)

If the scholar needs to obtain immunizations or does not possess immunization or other medical records, the Superintendent & CEO or designee shall refer the parent/guardian to the School Liaison. The School Liaison shall assist the parent/guardian in obtaining the necessary immunizations or records for the scholar. (42 U.S.C. § 11432(g)(3)(C).)

A homeless youth may remain in the scholar's school of origin for the entire period for which the youth is homeless. If a youth obtains permanent housing during an academic year, the youth will be permitted to remain in the school of origin through the end of the academic year.

Enrollment Disputes

If a dispute arises over admissions/enrollment, the scholar shall be immediately admitted (subject to Charter School's capacity and pursuant to the procedures stated in the Charter School charter and Board policy), pending final resolution of the dispute, including all available appeals. (42 U.S.C. § 11432(g)(3)(E).)

The parent/guardian shall be provided with a written explanation of the admission/enrollment decision, including an explanation of the parent/guardian's right to appeal the decision. The parent/guardian shall also be referred to the School Liaison. (42 U.S.C. § 11432(g)(3)(E).)

The School Liaison shall carry out the Board-adopted dispute resolution and complaint process as expeditiously as possible after receiving notice of the dispute. (42 U.S.C. § 11432(g)(3)(E).)

Comparable Services

Each homeless child or youth shall promptly be provided services comparable to services offered to other scholars in CCS such as (42 U.S.C. § 11432(g)(4)):

- Transportation services
- Educational services for which the child or youth meets eligibility criteria, such as educational programs for scholars with disabilities and educational programs for scholars with limited English proficiency
- Programs in vocational and technical education
- Programs for gifted and talented scholars
- Charter School nutrition programs

Transportation

In the event that CCS provides transportation services to all CCS scholars, CCS shall provide comparable transportation services to each homeless child or youth attending CCS, as noted above. (42 U.S.C. § 11432(g)(4).)

If CCS does not otherwise provide transportation services to all CCS scholars, CCS shall ensure that transportation is provided for homeless scholars to and from CCS, at the request of the parent or guardian (or School Liaison) if CCS is the scholar's school of origin. (42 U.S.C. § 11432(g)(1)(J).) Transportation provided by CCS will be adequate and appropriate for the Scholar's situation, but CCS does not commit to any one method of transportation for all youth.

Professional Development

All administrators, teachers and employees of CCS will be provided professional development on the identification, services, and sensitivity necessary when dealing with homeless children and youth. (42 U.S.C. § 11433(d)(3).) All identified or suspected homeless children and youth will be referred to the School Liaison.

High School Graduation Requirements

Homeless scholars who transfer to the CCS any time after the completion of their second year of high school shall be exempt from any of the Charter School's graduation requirements that are in excess of the California minimum graduation requirements specified in Education Code section 51225.3 ("additional graduation requirements") unless CCS makes a finding that the scholar is reasonably able to complete the Charter School's graduation requirements by the end of the scholar's fourth year of high school.

To determine whether a homeless scholar is in their third or fourth year of high school, either the number of credits the scholar has earned to the date of transfer or the length of the scholar's school enrollment may be used, whichever will qualify the scholar for the exemption.

Within thirty (30) calendar days of the date that a scholar who may qualify for exemption under the above requirements transfers into the Charter School, the Charter School shall notify the scholar, the scholar's educational rights holder, and the Charter School Liaison of the availability of the exemption and whether the scholar qualifies for an exemption.

The Charter School shall notify scholars who are exempted from the Charter School's additional graduation requirements and the scholar's educational rights holder of how any of the requirements that are waived will affect the scholar's ability to gain admission to a postsecondary educational institution and provide information about transfer opportunities available through the California Community Colleges.

The Charter School shall not require any scholar who would otherwise be entitled to remain in attendance at the Charter School to accept the exemption from the Charter School's additional graduation requirements or deny the scholar enrollment in, or the ability to complete, courses for which the scholar is otherwise eligible. The Charter School shall not revoke an exemption and shall grant an eligible scholar's request for the exemption at any time if the scholar qualifies, regardless of whether the scholar previously declined the exemption. An eligible scholar's exemption from the Charter School's additional graduation requirements will continue to apply while the scholar is enrolled in the Charter School or if the scholar transfers to another school even after the scholar no longer meets the definition of a homeless child.

The Charter School shall not require or request that a scholar transfer schools in order to qualify the scholar for the exemption. Nor shall a scholar, a scholar's parent/guardian or educational rights holder, or a scholar's social worker or probation officer request a transfer solely to qualify for an exemption from the Charter School's additional graduation requirements.

If a scholar who is exempted from the Charter School's additional graduation requirements completes the California minimum coursework requirements specified in Education Code section 51225.3 before the end of the scholar's fourth year of high school and would otherwise be entitled to remain in attendance at the Charter School, the Charter School shall not require or request that the scholar graduate before the end of the scholar's fourth year of high school.

If the Charter School determines the scholar is reasonably able to complete the Charter School's graduation requirements by the end of the scholar's fifth year of high school, the Charter School shall do the following:

1. Inform the scholar of the scholar's option to remain at the Charter School for a fifth year to complete the Charter School's graduation requirements.
2. Inform the scholar, and the educational rights holder for the scholar, about how remaining in school for a fifth year to complete the Charter School's graduation requirements will affect the scholar's ability to gain admission to a postsecondary educational institution.
3. Provide information to the scholar about transfer opportunities available through the California Community Colleges.
4. Permit the scholar to stay at the Charter School for a fifth year to complete the Charter School's graduation requirements upon agreement with the scholar, if the scholar is 18 years of age or older, or, if the scholar is under 18 years of age, upon agreement with the educational rights holder for the scholar.

Acceptance of Course Work

The Charter School will accept any coursework satisfactorily completed at any public school, a juvenile court school, a school in a country other than the United States, and/or a nonpublic, nonsectarian school or agency by a homeless scholar.

The Charter School will provide homeless scholars credit for the partial completion of courses taken while attending a public school, a juvenile court school, a school in a country other than the United States, and/or a nonpublic, nonsectarian school or agency. If the scholar did not complete the entire course, the Charter School shall not require the scholar to retake the portion of the course the scholar completed unless the Charter School, in consultation with the holder of educational rights for the scholar, finds that the scholar is reasonably able to complete the requirements in time to graduate from high school. When partial credit is awarded in a particular course, the homeless scholar shall be enrolled in the same or equivalent course, if applicable, so that the scholar may continue and complete the entire course. These scholars shall not be prevented from taking or retaking a course to meet California State University or the University of California admission eligibility requirements.

Notice

For any homeless scholar who seeks enrollment at the Charter School, written notice will be provided to the parent/guardian at the time of enrollment and at least twice annually while the scholar is enrolled at the School in alignment with the law. (42 U.S.C. § 11432(e)(3)(C).)

Annual Policy Review

The Charter School shall annually review and revise any policies that may act as barriers to the identification of homeless children and youths or the enrollment of homeless children and youths at the Charter School. In reviewing and revising such policies, consideration shall be given to

issues concerning transportation, immunization, residency, birth certificates, school records and other documentation, and guardianship. Special attention shall be given to ensuring the identification, enrollment, and attendance of homeless children and youths who are not currently attending school.

Board Policy #: 26
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 26 -- SCHOLAR POLICY – EDUCATION FOR FOSTER AND MOBILE YOUTH

Introduction

The Governing Board of Compass Charter Schools ("CCS" or the "Charter School") recognizes that Foster and Mobile Youth may face significant barriers to achieving academic success due to their family circumstances, disruption to their educational program, and their emotional, social, and other health needs. To enable such scholars to achieve state and charter school academic standards, the Charter School shall provide them with full access to the Charter School's educational program and implement strategies identified as required by law and necessary for the improvement of the academic achievement of foster youth in the Charter School's local control and accountability plan ("LCAP").

Definitions

- *Foster youth* means a child who has been removed from their home pursuant to California Welfare and Institutions Code section 309, and/or is the subject of a petition filed under Welfare and Institutions Code sections 300 or 602, . This includes children who are the subject of cases in dependency court and juvenile justice court.

- *Former juvenile court school pupil* means pupil who, upon completion of the pupil's second year of high school, transfers from a juvenile court school to the Charter School.

- *Child of a military family* refers to a scholar who resides in the household of an active duty military member.

- *Currently Migratory Child* refers to a child who, within the last 12-months, has moved with a parent, guardian, or other person having custody to the Charter School from another Local Educational Agency ("LEA"), either within California or from another state, so that the child or a member of the child's immediate family might secure temporary or seasonal employment in an agricultural or fishing activity, and whose parents or guardians have been informed of the child's eligibility for migrant education services. "Currently Migratory Child" includes a child who, without the parent/guardian, has continued to migrate annually to secure temporary or seasonal employment in an agricultural or fishing activity.

- *Pupil participating in a newcomer program* means a pupil who is participating in a program designed to meet the academic and transitional needs of newly arrived immigrant pupils that has as a primary objective the development of English language proficiency.

- *Educational Rights Holder ("ERH")* means a parent, guardian, responsible adult appointed by a court to make educational decisions for a minor pursuant to Welfare and

Institutions Code sections 319, 361 or 726, or a person holding the right to make educational decisions for the pupil pursuant to Education Code section 56055.

- *School of origin* means the school that the foster youth attended when permanently housed or the school in which the foster youth was last enrolled. If the school the foster youth attended when permanently housed is different from the school in which the scholar was last enrolled, or if there is some other school that the foster youth attended within the immediately preceding 15 months, the Charter School liaison for foster youth, in consultation with and with the agreement of the foster youth and the ERH for the youth, shall determine, in the best interests of the foster youth, the school that shall be deemed the school of origin.

- *Best interests* means that, in making educational and school placement decisions for a foster youth, consideration is given to, among other factors, the opportunity to be educated in the least restrictive educational program and the foster youth's access to academic resources, services, and extracurricular and enrichment activities that are available to all Charter School scholars.

Within this Policy, foster/juvenile court youth, former juvenile court school pupils, a child of a military family, a currently migratory child, and a pupil participating in the newcomer program will be referred to collectively as "Foster and Mobile Youth."

Foster and Mobile Youth Liaison

In order to help facilitate the enrollment, placement, and transfer of Foster and Mobile Youth to the Charter School, the Governing Board shall designate a Foster and Mobile Youth liaison. The Governing Board designates the following position as the Charter School's liaison for Foster and Mobile Youth:

Karla Gonzalez | McKinney-Vento Liaison
850 Hampshire Road, Suite R
Thousand Oaks, California 91361
(818) 372-0620
kgonzalez@compasscharters.org

The Foster and Mobile Youth Liaison shall be responsible for the following:

1. Ensure and facilitate the proper educational placement, enrollment in the Charter School, and checkout from the Charter School of Foster and Mobile Youth.
2. Ensure proper transfer of credits, records, and grades when Foster and Mobile Youth transfer to or from the Charter School.
3. When a foster youth is enrolling in the Charter School, the Foster and Mobile Youth Liaison shall contact the school last attended by the scholar, within two (2) business days, to obtain all academic and other records. The last school attended by the foster youth shall provide all required records to the new school regardless of any outstanding fees, fines, textbooks, or other items or moneys owed to the school last attended. When a foster youth is transferring to a new school, the Foster and Mobile Youth Liaison shall provide the scholar's records to the new school within two (2) business days of receiving the new school's request, regardless of any outstanding fees, fines, textbooks, or other items or moneys owed to the Charter School.

4. When required by law, notify the foster youth's attorney and the appropriate representative of the county child welfare agency at least ten (10) calendar days preceding the date of the following:
    - An expulsion hearing for a discretionary act under the Charter School's charter.
    - Any meeting to extend a suspension until an expulsion decision is rendered if the decision to recommend expulsion is a discretionary act under the Charter School's charter. The foster youth's attorney and the agency representative will be invited to participate.
    - A manifestation determination meeting prior to a change in the foster youth's placement, if the change in placement is due to an act for which the recommendation for expulsion is discretionary and the scholar is a scholar with a disability under state and federal special education laws. The foster youth's attorney and the agency representative will be invited to participate.
5. As needed, make appropriate referrals to ensure that scholars in foster care receive necessary special education services and services under Section 504 of the federal Rehabilitation Act of 1973.
6. As needed, ensure that scholars in foster care receive appropriate school-based services, such as counseling and health services, supplemental instruction, and after-school services.
7. Develop protocols and procedures for creating awareness for Charter School staff, including but not limited to coordinator, counselors, directors, enrollment team, and teachers, of the requirements for the proper enrollment, placement, and transfer of foster youth.
8. Collaborate with the county placing agency, social services, probation officers, juvenile court officers, and other appropriate agencies to help coordinate services for the Charter School's foster youth.
9. Monitor the educational progress of foster youth and provide reports to the Superintendent & CEO or designee and the Governing Board based on indicators identified in the Charter School's local control and accountability plan.
10. This Policy does not grant the Foster and Mobile Youth Liaison authority that supersedes the authority granted under state and federal law to a parent or legal guardian retaining educational rights, a responsible person appointed by the court to represent the child pursuant to Welfare and Institutions Code sections 319, 361 or 726, a surrogate parent, or a foster parent exercising authority under Education Code section 56055. The role of the Foster and Mobile Youth Liaison is advisory with respect to placement options and determination of the school of origin.

School Stability and Enrollment

The Charter School will work with foster youth and their ERH to ensure that each foster youth is placed in the least restrictive educational programs and has access to the academic resources, services, and extracurricular and enrichment activities that are available to all scholars, including, but not limited to, interscholastic sports. All decisions regarding a foster youth's education and placement will be based on the best interest of the child and shall consider, among other factors, educational stability and the opportunity to be educated in the least restrictive educational setting necessary to achieve academic progress.

Foster youth, currently migratory children, and children of military families have the right to remain in their school of origin if it is their best interest. The Charter School will immediately enroll a foster youth, a currently migratory child, or child of a military family seeking

reenrollment in the Charter School as their school of origin.

A foster youth, currently migratory child, or child of a military family who seeks to transfer to the Charter School will be immediately enrolled (subject to the Charter School's capacity, if the Charter School is not the scholar's school of origin, and pursuant to the procedures stated in the Charter School's charter and Board policy) even if the scholar has outstanding fees, fines, textbooks, or other items or monies due to the school last attended or is unable to meet normal enrollment documentation or school uniform requirements (e.g. producing medical records or academic records from a previous school).At the initial detention or placement, or any subsequent change in placement, the foster youth may continue in their school of origin for the duration of the court's jurisdiction.

A currently migratory child or child of a military family may continue in their school of origin as long as the scholar meets the definition of a currently migratory child or child of a military family as described above. Foster youth, currently migratory children, and children of military families have the right to remain in their school of origin following the termination of the court's jurisdiction or termination of the child's status as a currently migratory child or child of a military family, as follows:

1. For scholars in Kindergarten through eighth grade, inclusive, the scholar will be allowed to continue in the school of origin through the duration of the academic year in which the scholar's status changed.
2. For scholars enrolled in high school, the scholar will be allowed to continue in the school of origin through graduation.

If the foster youth, currently migratory child or child of a military family is transitioning between school grade levels, the youth shall be allowed to continue in the district of origin in the same attendance area to provide the youth the benefit of matriculating with their peers in accordance with the established feeder patterns of school districts. A scholar who is transitioning to a middle school or high school shall be allowed to enroll in the school designated for matriculation in another school district.

The Foster and Mobile Youth Liaison may, in consultation with and with the agreement of the foster youth and the ERH for the foster youth, recommend that the foster youth's right to attend the school of origin be waived and the scholar be enrolled in any district school that the scholar would otherwise be eligible to attend as a resident of the school district or in the Charter School consistent with current enrollment procedures. All decisions shall be made in accordance with the foster youth's best interests.

Prior to making any recommendation to move a foster youth from their school of origin, the Foster and Mobile Youth Liaison shall provide the foster youth and the foster youth's ERH with a written explanation of the basis for the recommendation and how the recommendation serves the foster youth's best interests.

If any dispute arises regarding a foster youth's request to remain in the Charter School as the foster youth's school of origin, the foster youth has the right to remain in the Charter School pending resolution of the dispute. The dispute shall be resolved in accordance with the existing Charter School dispute resolution process.

Transportation

The Charter School shall not be responsible for providing transportation to allow a foster youth to attend school, unless there is an agreement with a local child welfare agency that the Charter School assumes part or all of the transportation costs in accordance with Section 6312(c)(5) of Title 20 of the United States Code, or unless required by federal law. The Charter School is not prohibited from providing transportation, at its discretion, to allow a foster youth to attend school.

In accordance with Section 6312(c)(5) of Title 20 of the United States Code, the Charter School shall collaborate with local child welfare agencies to develop and implement clear written procedures to address the transportation needs of foster youth to maintain them in their school of origin, when it is in the best interest of the youth.

For any scholar who has an Individualized Education Program ("IEP"), the scholar's IEP team will determine if the scholar requires special education transportation as a related service regardless of the scholar's status.

Effect of Absences on Grades

The grades of a foster youth shall not be lowered for any absence from the Charter School that is due to either of the following circumstances:

1. A decision by a court or placement agency to change the scholar's placement, in which case the scholar's grades shall be calculated as of the date the scholar left school.
2. A verified court appearance or related court-ordered activity.

Transfer of Coursework and Credits

The Charter School shall accept coursework satisfactorily completed by a Foster and Mobile Youth while attending another public school**[2], a juvenile court school, a charter school, a school in a country other than the United States, or a nonpublic, nonsectarian school or agency even if the scholar did not complete the entire course and shall issue that scholar full or partial credit for the coursework completed.

If the Foster and Mobile Youth did not complete the entire course, the scholar shall be issued partial credit for the coursework completed and shall not be required to retake the portion of the course that the scholar completed at another school, unless the Charter School, in consultation with the scholar's ERHS, finds that the foster youth is reasonably able to complete the requirements in time to graduate from high school. Whenever partial credit is issued to a Foster and Mobile Youth in any particular course, the scholar shall be enrolled in the same or equivalent course, if applicable, so that the scholar may continue and complete the entire course.

In no event shall the Charter School prevent a Foster and Mobile Youth from taking or retaking a course to meet the eligibility requirements for admission to the California State University or the University of California.

[2] For purposes of coursework completed by a scholar who is a child of a military family, "public school" includes schools operated by the United States Department of Defense.

Applicability of Graduation Requirements

To obtain a high school diploma from the Charter School, scholar must complete all courses required by the Charter School, and fulfill any additional graduation requirements prescribed by the Board.

However, Foster and Mobile Youth who transfer to the Charter School any time after the completion of their second year of high school, and scholars participating in a newcomer program who are in their third or fourth year of high school, shall be exempt from any of the Charter School's graduation requirements, that are in excess of the California minimum graduation requirements specified in Education Code section 51225.3 ("additional graduation requirements") unless the Charter School makes a finding that the scholar is reasonably able to complete the Charter School's graduation requirements by the end of the scholar's fourth year of high school. To determine whether a Foster and Mobile Youth is in their third or fourth year of high school, either the number of credits the scholar has earned to the date of transfer or the length of the scholar's school enrollment may be used, whichever will qualify the scholar for the exemption. For a pupil participating in a newcomer program, enrollment in grade 11 or 12 may be used to determine whether the scholar is in their third or fourth year of high school. Within thirty (30) calendar days of the date that a scholar who may qualify for exemption under the above requirements transfers into the Charter School, the Superintendent & CEO or designee shall notify the foster youth, the ERH, and where applicable, the foster youth's social worker or probation officer of the availability of the exemption and whether the foster youth qualifies for the exemption. If the Charter School fails to provide timely notice of the availability of the exemption, the Foster and Mobile Youth shall be eligible for the exemption from the additional graduation requirements once notified, even if that notification occurs after the termination of the court's jurisdiction over the scholar, if the foster youth otherwise qualifies for the exemption.

If a scholar in foster care is exempted from the Charter School's additional graduation requirements pursuant to this Policy and completes the statewide coursework requirements specified in Education Code section 51225.3 before the end of their fourth year of high school and that scholar would otherwise be entitled to remain in attendance at Charter School, Charter School shall not require or request that the scholar graduate before the end of their fourth year of high school.

The Superintendent & CEO or designee shall notify a Foster and Mobile Youth and their ERH if the Charter School grants an exemption from the additional graduation requirements, how any requirements that are waived will affect the foster youth's ability to gain admission to a postsecondary educational institution and shall provide information about transfer opportunities available through the California Community Colleges.

A Foster and Mobile Youth who would otherwise be entitled to remain in attendance at the Charter School shall not be required to accept the exemption from additional graduation requirements or be denied enrollment in, or the ability to complete, courses for which the scholar is otherwise eligible, including courses necessary to attend an institution of higher education, regardless of whether those courses are required for statewide graduation requirements.

If an eligible scholar is not exempted from additional graduation requirements or has previously declined the exemption pursuant to this Policy, the Charter School shall exempt the scholar at

any time if an exemption is requested by the foster youth and the foster youth qualifies for the exemption. Likewise, if the foster youth is exempted, the Charter School may not revoke the exemption.

If a Foster and Mobile Youth is exempted from additional graduation requirements pursuant to this section, the exemption shall continue to apply after the termination of the court's jurisdiction over the scholar or after the termination of circumstances which make the scholar eligible while he or she is enrolled in school or if the scholar transfers to another school, including a charter school, or school district.

The Charter School shall not require or request a Foster and Mobile Youth to transfer schools in order to qualify for an exemption from additional graduation requirements, and no Foster and Mobile Youth or any person acting on behalf of a Foster and Mobile Youth may request a transfer solely to qualify for an exemption from the Charter School's additional graduation requirements.

Upon making a finding that a Foster and Mobile Youth is reasonably able to complete the Charter School graduation requirements within the scholar's fifth year of high school, the Superintendent & CEO or designee shall:

1. Inform the scholar and the scholar's ERH of the scholar's option to remain in school for a fifth year to complete the Charter School's graduation requirements, consistent with the laws regarding continuous enrollment and satisfactory progress for Charter School scholars over age 19.
2. Inform the scholar and scholar's ERH how remaining in school for a fifth year will affect the scholar's ability to gain admission to a postsecondary educational institution.
3. Provide information to the scholar about transfer opportunities available through the California Community Colleges.

4. Upon agreement with the scholar or, if the scholar is under 18 years of age, the ERH, permit the scholar to stay in school for a fifth year to complete the Charter School's graduation requirements.

If a juvenile court youth satisfies the requirements for high school graduation while enrolled at a juvenile court school but has elected to decline the issuance of the diploma for the purpose of taking additional coursework, the Charter School will not prevent the juvenile court youth from enrolling in the Charter School and pursuing additional coursework if requested by the youth or by the youth's ERH.

Eligibility for Extracurricular Activities

A scholar who is in foster care whose residence changes pursuant to a court order or decision of a child welfare worker shall be immediately deemed to meet all residency requirements for participation in interscholastic sports or other extracurricular activities.

Waiver of Fees for Afterschool Programs

The Charter School shall not charge any scholar who the Charter School knows is currently in foster care any family fees associated with an After-School Education and Safety ("ASES") Program operated by the Charter School.

Scholar Records

When the Charter School receives a transfer request and/or scholar records request for the educational information and records of a foster youth from a new LEA, the Charter School shall provide these scholar records within five (5) business days. The Charter School shall compile the complete educational record of the scholar, including but not limited to a determination of seat time, full or partial credits earned, current classes and grades, immunization and other records, and, if applicable, a copy of the scholar's special education records including assessments, IEPs, and/or 504 plans. All requests for scholar records will be shared with the Foster and Mobile Youth Liaison, who shall be aware of the specific educational record keeping needs of Foster and Mobile Youth.

In accordance with the Charter School's Educational Records and Scholar Information Policy, under limited circumstances, the Charter School may disclose scholar records or personally identifiable information contained in those records to certain requesting parties including but not limited to a foster family agency and state and local authorities within a juvenile justice system, without parental consent.

Complaints of Noncompliance

Complaints of noncompliance with this Policy shall be governed by the Charter School's Uniform Complaint Procedures. A copy of the Uniform Complaint Policy and Procedures is included within this Policy Manual in Section 39.

Board Policy #: 27
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 27 – SCHOLAR POLICY – EDUCATIONAL RECORDS AND SCHOLAR INFORMATION POLICY

The Board of Directors of Compass Charter Schools, a California nonprofit public benefit corporation operating public charter schools, adopts this Educational Records and Scholar Information Policy to apply to all educational records and scholar information maintained by CCS.

I. DEFINITIONS

1. Education Record

An education record is any information recorded in any way, including, but not limited to, handwriting, print, computer media, video or audio tape, film, microfilm, and microfiche that directly relates to a scholar and is maintained by CCS or by a party acting for CCS. Such information includes, but is not limited to:

a. Date and place of birth; parent and/or guardian's address, mother's maiden name and where the parties may be contacted for emergency purposes;

b. Grades, test scores, courses taken, academic specializations and school activities;

c. Special education records;

d. Disciplinary records;

e. Medical and health records;

f. Attendance records and records of past schools attended; and/or

g. Personal information such as, but not limited to, a scholar's name, the name of a scholar's parent or other family member, scholar identification numbers, social security numbers, photographs, biometric record or any other type of information that aids in identification of a scholar.

An education record does not include any of the following:

a. Records that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record;
b. Records maintained by a law enforcement unit of CCS that were created by that law enforcement unit for the purpose of law enforcement;
c. In the case of a person who is employed by CCS but not in attendance at CCS, records made and maintained in the normal course of business, relate exclusively to the individual in that individual's capacity as an

employee and are not available for any other purpose;

d. Records on a scholar who is 18 years of age or older, or is attending an institution of postsecondary education, that are: a) made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his or her professional capacity or assisting in a paraprofessional capacity; b) made, maintained, or used only in connection with treatment of the scholar; and c) disclosed only to individuals providing the treatment. For the purpose of this definition, "treatment" does not include remedial educational activities or activities that are part of the program of instruction at CCS;

e. Records that only contain information about an individual after he or she is no longer a scholar at CCS; or

f. Grades on peer-graded papers before they are collected and recorded by a teacher.

2. <u>Personally Identifiable Information</u>

Personally identifiable information ("PII") is information about a scholar that is contained in his or her education records that cannot be disclosed without compliance with the requirements of the Family Educational Rights and Privacy Act of 2001 ("FERPA"). PII includes, but is not limited to: a scholar's name; the name of a scholar's parent or other family member; the address of a scholar or scholar's family; a personal identifier, such as the scholar's Social Security number, scholar number or biometric record; other indirect identifiers, such as the scholar's date of birth, place of birth, and mother's maiden name; other information that, alone or in combinations, is linked or linkable to a specific scholar that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the scholar with reasonable certainty; or information requested by a person who CCS reasonably believes knows the identity of the scholar to whom the education record relates.

3. <u>Directory Information</u>

CCS may disclose the PII that it has designated as directory information, consistent with the terms of the annual notice provided by CCS pursuant to FERPA (20 U.S.C. § 1232g). CCS has designated the following information as directory information:

- Scholar's name
- Scholar's address
- Parent/guardian's address
- Telephone listing
- Scholar's electronic mail address
- Parent/guardian's electronic mail address
- Photograph/video
- Date and place of birth
- Dates of attendance
- Grade level
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- Degrees, honors, and awards received

- The most recent educational agency or institution attended
- Scholar ID number, user ID, or other unique personal identifier used to communicate in electronic systems that cannot be used to access education records without a PIN, password, etc. (A scholar's SSN, in whole or in part, cannot be used for this purpose.)

4. Parent

Parent means a parent of a scholar and includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or a guardian.

5. Eligible Scholar

Eligible scholar means a scholar who has reached eighteen (18) years of age.

6. School Official

A school official is a person employed by CCS as an administrator, supervisor, instructor, or support staff member (including health or medical staff and law enforcement unit personnel) or a person serving on the Board of Directors of CCS. A school official also may include a volunteer for CCS or an independent contractor, consultant, or vendor of CCS or other party who performs an institutional service or function for which CCS would otherwise use its own employees and who is under the direct control of CCS with respect to the use and maintenance of PII from education records, such as an attorney, auditor, medical consultant, therapist, or provider of digital educational platforms and services; a parent or scholar volunteering to serve on an official committee, such as a disciplinary or grievance committee; or a parent, scholar, or other volunteer assisting another school official in performing their tasks.

7. Legitimate Educational Interest

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

II. DISCLOSURE OF DIRECTORY INFORMATION

At the beginning of each school year, CCS shall provide parents and eligible scholars with a notice containing the following information: 1) The type of PII it designates as directory information; 2) The parent's or eligible scholar's right to require that CCS not release "directory information" without obtaining prior written consent from the parent or eligible scholar; and 3) The period of time within which a parent or eligible scholar must notify CCS in writing of the categories of "directory information" that it may not disclose without the parent's or eligible scholar's prior written consent. CCS will continue to honor a valid request to opt out of the disclosure of a former scholar's directory information made while the former scholar was in attendance unless the scholar rescinds the opt out request.

III. ANNUAL NOTIFICATION TO PARENTS AND ELIGIBLE SCHOLARS

At the beginning of each school year, in addition to the notice required for directory information, CCS shall provide eligible scholars currently in attendance and parents of scholars currently in attendance with a notice of their rights under the FERPA. The notice shall inform the parents and eligible scholars that they have the right to:

1. Inspect and review the scholar's education records;

2. Seek amendment of the scholar's education records that the parent or eligible scholar believes to be inaccurate, misleading or otherwise in violation of the scholar's privacy rights;
3. Consent to disclosures of PII contained in the scholar's education records, except to the extent that disclosure is permitted without prior written consent pursuant to FERPA;
4. File with the U.S. Department of Education a complaint concerning alleged failures by CCS to comply with the requirements of FERPA and its promulgated regulations; and
5. Request that CCS not release scholar names, addresses and telephone listings to military recruiters or institutions of higher education without prior written parental consent.

The notice must also include the following:

1. The procedure for exercising the right to inspect and review educational records;
2. The procedure for requesting amendment of records;
3. A statement that CCS forwards education records to other agencies or institutions that have requested the records and in which the scholar seeks or intends to enroll or is already enrolled so long as the disclosure is for purposes related to the scholar's enrollment or transfer; and
4. The criteria for determining who constitutes a school official and what constitutes a legitimate educational interest.

IV. PARENTAL AND ELIGIBLE STUDENT RIGHTS RELATING TO EDUCATION RECORDS

Parents and eligible scholars have the right to review the scholar's education records. In order to do so, parents and eligible scholars shall submit a request to review education records in writing to the Superintendent & CEO. Within five (5) business days, CCS shall comply with the request.

1. Copies of Education Records

CCS will provide copies of requested documents within five (5) business days of a written request for copies. CCS may charge reasonable fees for copies it provides to parents or eligible scholars. However, no charge shall be made for furnishing (1) up to two transcripts of former scholars' records or (2) up to two verifications of various records of former scholars. The charge will not include a fee to search for or to retrieve the education records.

2. Request for Amendment to Education Records

Following the inspection and review of a scholar's education record, a parent or eligible scholar may file a written request with the Superintendent & CEO to correct or remove any information in the scholar's education record that is any of the following:

(1) Inaccurate.
(2) Misleading.
(3) In violation of the privacy rights of the scholar.

CCS will respond within thirty (30) days of the receipt of the request to amend. CCS's response will be in writing and if the request for amendment is denied, CCS will set forth the reason for the denial and inform the parent or eligible scholar of their right to a hearing challenging the content of the education record.

If the Superintendent & CEO sustains any or all of the allegations, he or she must order the correction or the removal and destruction of the information. The

Superintendent & CEO or designee must then inform the parent or eligible scholar of the amendment in writing.

3. Hearing to Challenge Education Record

If CCS denies a parent or eligible scholar's request to amend an education record, the parent or eligible scholar may, within thirty (30) days of the denial, request in writing that the parent or eligible scholar be given the opportunity for a hearing to challenge the content of the scholar's education record on the grounds that the information contained in the education record is: inaccurate, misleading, or in violation of the privacy rights of the scholar.

The Superintendent & CEO or the Board Chair may convene a hearing panel to assist in making determinations regarding educational record challenges provided that the parent has given written consent to release information from the pupil's records to the members of the panel convened. The hearing panel shall consist of the following persons:

(1) The Superintendent of a public school other than the public school at which the record is on file;

(2) A certificated CCS employee; and

(3) A parent appointed by the Superintendent or by the Board of Directors, depending upon who convenes the panel.

The hearing to challenge the education record shall be held within thirty (30) days of the date of the request for a hearing. Notice of the date, time and place of the hearing will be sent by CCS to the parent or eligible scholar no later than twenty (20) days before the hearing.

The hearing will be conducted by the Superintendent & CEO or designee, who shall not be required to use formal rules of evidence or procedure. The parent or eligible scholar will be given a full and fair opportunity to present evidence relevant to the issues relating to the challenge to the education record. The parent or eligible scholar may also, at their own expense, be assisted or represented by one or more individuals of their choice, including an attorney. The decision of the Superintendent & CEO or designee will be based solely on the evidence presented at the hearing and is final. Within thirty (30) days after the conclusion of the hearing, CCS's decision regarding the challenge will be made in writing and will include a summary of the evidence and the reasons for the decision.
If, as a result of the hearing, CCS decides that the information is inaccurate, misleading, or in violation of the privacy rights of the scholar, it will amend the record accordingly and inform the parent or eligible scholar of the amendment in writing.

If, as a result of the hearing, CCS decides that the information in the education record is not inaccurate, misleading, or in violation of the privacy rights of the scholar, it shall inform the parent or eligible scholar of the right to place a statement in the record commenting on the contested information in the record or

stating why they disagree with the decision of CCS, or both. If CCS places a statement by the parent or eligible scholar in the education records of a scholar, it will maintain the statement with the contested part of the record for as long as the record is maintained and disclose the statement whenever it discloses the portion of the record to which the statement relates.

V. DISCLOSURE OF EDUCATION RECORDS AND DIRECTORY INFORMATION

CCS must have a signed and dated written consent from the parent or eligible scholar before releasing any non-directory information from a scholar's education record except as provided below. The written permission must specify the records that may be disclosed, the purpose of the disclosure and the party or class of parties to whom the disclosure may be made. When disclosure is made pursuant to written permission, the parent or eligible scholar may request a copy of the disclosed records and CCS shall provide the requestor with a copy of the records disclosed upon request. Signed and dated written consent may include a record and signature in electronic form if it identifies and authenticates a particular person as the source of the electronic consent and indicates such person's approval of the information contained in the electronic consent.

CCS will only disclose PII on the condition that the receiving party not disclose the information to any party without the prior written consent of the parent or eligible scholar and that the receiving party use the information for the purposes for which the disclosure was made. This restriction does not apply to disclosures that fall within the disclosure exceptions listed below. CCS must maintain the appropriate records related to these disclosure exceptions, as described below. Except for disclosures pursuant to a warrant, judicial order or lawfully issued subpoena, or directory information or to parents or eligible scholars, CCS will inform a receiving party of the requirement that the party not disclose the information to any other party without the prior written consent of the parent or eligible scholar and that the receiving party use it for the purpose for which the disclosure was made. Note specifically that CCS will not release information to third parties for immigration-enforcement purposes, except as required by law or court order.

CCS will disclose education records, without prior written consent of the parent or eligible scholar, to the following parties:

1. School officials who have a legitimate educational interest as defined by 34 Code of Regulations ("C.F.R.") Part 99;
2. Other schools to which a scholar seeks or intends to enroll so long as the disclosure is for purposes related to the scholar's enrollment or transfer. When a scholar transfers schools, CCS will mail the original or a copy of a scholar's cumulative file to the receiving district or private school within ten (10) school days following the date the request is received from the public school or private school where the pupil intends to enroll. CCS will make a reasonable attempt to notify the parent or eligible scholar of the request for records at their last known address, unless the disclosure is initiated by the parent or eligible scholar. Additionally, CCS will give the parent or eligible scholar, upon request, a copy of the record that was disclosed and give the parent or eligible scholar, upon request, an opportunity for a hearing pursuant to Section (IV)(3) above;
3. Certain government officials listed in 20 U.S.C. § 1232g(b)(1) in order to carry out lawful functions;

4. Appropriate parties in connection with a scholar's application for, or receipt of, financial aid if it is necessary to determine eligibility, amount of aid, conditions for aid or enforcing the terms and conditions of the aid;
5. Organizations conducting certain studies for CCS in accordance with 20 U.S.C. § 1232g(b)(1)(F);
6. Accrediting organizations in order to carry out their accrediting functions;
7. Parents of a dependent scholar as defined in section 152 of the Internal Revenue Code of 1986;
8. Individuals or entities, in compliance with a judicial order or lawfully issued subpoena. Subject to the exceptions found in 34 C.F.R. § 99.31(a)(9)(i), reasonable effort must be made to notify the parent or eligible scholar of the order or subpoena in advance of compliance, so that the parent or eligible scholar may seek a protective order;
9. Persons who need to know in cases of health and safety emergencies;
10. State and local authorities, within a juvenile justice system, pursuant to specific State law;
11. A foster family agency with jurisdiction over a currently enrolled or former scholar, a short-term residential treatment program staff responsible for the education or case management of a scholar, and/or a caregiver (regardless of whether the caregiver has been appointed as the pupil's educational rights holder) who has direct responsibility for the care of the scholar, including a certified or licensed foster parent, an approved relative or nonrelated extended family member, or a resource family, may access the current or most recent records of grades, transcripts, attendance, discipline, and online communication on platforms established by CCS for scholar and parents, and any individualized education program ("IEP") or Section 504 plan that may have been developed or maintained by CCS; and/or
12. A victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense. The disclosure may only include the final results of the disciplinary proceedings conducted by CCS with respect to that alleged crime or offense. CCS may disclose the final results of the disciplinary proceeding, regardless of whether CCS concluded a violation was committed.

VI. RECORD KEEPING REQUIREMENTS

CCS will maintain a record of each request for access to and each disclosure of PII from the education records of each scholar for as long as the records are maintained. For each request, the record must include the following information: the parties who have requested or received the information and the legitimate interests the parties had in requesting or obtaining the information.

For disclosures of PII to institutions that make disclosures of the information on behalf of CCS in accordance with 34 C.F.R. § 99.33(b), the record must include the names of the additional parties to which the receiving party may disclose the information on behalf of CCS and the legitimate interests that each of the additional parties has in requesting or obtaining the information.

These record keeping requirements do not apply to requests from or disclosure to parents or eligible scholars, CCS officials with a legitimate purpose of inspecting the records, a party with written consent from the parent or eligible scholar, a party seeking directory information, or a party seeking or receiving the records as directed by a court order or subpoena.

The records relating to disclosures of personally identifiable scholar information may be inspected by parents and eligible scholars, CCS officials (or their assistants) responsible for the custody of the records, and parties authorized by regulations for the purpose of auditing the recordkeeping procedures of CCS.

Scholar cumulative records may not be removed from the premises of CCS, unless the individual removing the record has a legitimate educational interest, and is authorized by the Superintendent & CEO, or by a majority of a quorum of the Board of Directors at a duly agendized meeting. Employees who remove scholar cumulative records or other scholar records from the CCS premises without a legitimate educational interest and authorization may be subject to discipline. Employees are permitted to take scholar work-product, or other appropriate scholar records, off premises without authorization for legitimate academic purposes (e.g. grading work-product, assigning credit, reviewing materials for classroom discussion, etc.)

VII. COMPLAINTS

Parents and eligible scholars have the right to file a complaint with the U.S. Department of Education concerning alleged failures by CCS to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue. S.W.
Washington, D.C. 20202-5920

VIII. RECORD RETENTION

CCS complies with the definition and retention of scholar records as established in Title 5 of the California Code of Regulations ("CCR") sections 431 through 438, per the following:

Mandatory Permanent Pupil Records: must be maintained indefinitely or an exact copy thereof for every scholar who was enrolled in the Charter School. These records are defined as:

- Legal name of pupil
- Date of birth
- Method of verification of birth date
- Sex of pupil
- Place of birth
- Name and address of parent of minor pupil
    (1) Address of minor pupil if different than above
    (2) An annual verification of the name and address of the parent and the residence of the pupil
- Entering and leaving date of each school year and for any summer session or other extra session
- Subjects taken during each year, half year, summer session or quarter
- If marks or credit are given, the mark or number of credits toward graduation allows for work taken.
- Verification of or exemption from required immunizations
- Date of high school graduation or equivalent

The mandatory permanent student record or a copy thereof shall be forwarded by the Charter School upon request of a public or private school in which the student has enrolled or intends to enroll. If the Charter School forwards the original mandatory permanent student record, a copy must be maintained by the Charter School. If the Charter School forwards a copy, the original must be maintained by the Charter School.

Mandatory Interim Pupil Records: must be maintained until judged to be disposable defined as "when the student leaves the charter school or when their usefulness ceases. These records may be destroyed during the third (3rd) school year following the determination that the records are disposable (i.e. 2019-2020 records may be destroyed after July 1, 2023). These records are defined as:

- A log or record identifying those persons (except authorized school personnel) or organizations requesting or receiving information from the record. The log or record shall be accessible only to the legal parent or guardian or the eligible pupil, or a dependent adult pupil, or an adult pupil, or the custodian of records.
- Health information, including Child Health Developmental Disabilities Prevention Program verification or waiver
- Participation in special education programs including required tests, case studies, authorizations, and actions necessary to establish eligibility for admission or discharge
- Language training records
- Progress slips and/or notices
- Parental restrictions regarding access to directory information or related stipulations.
- Parental or adult pupil rejoinders to challenged records and to disciplinary action
- Parental authorizations or prohibitions of pupil participation in specific programs
- Results of standardized tests administered within the preceding three years

The mandatory interim scholar record or a copy thereof shall be forwarded by the Charter School upon request of a public school in California in which the scholar has enrolled or intends to enroll. If the transfer is to an out of state or to a private school, the mandatory interim scholar record may be forwarded. If the Charter School forwards the original mandatory interim scholar record, a copy must be maintained by the Charter School until it is destroyed in accordance with this Policy. If the Charter School forwards a copy, the original must be maintained by the Charter School until destroyed in accordance with this Policy.

Permitted Scholar Records: may be maintained and may be destroyed when their usefulness ceases or after six (6) months following the pupil's completion or withdrawal from school. These records are defined as:

1. Objective counselor and/or teacher ratings
2. Standardized test results older than three years
3. Routine discipline data
4. Verified reports of relevant behavioral patterns
5. All disciplinary notices
6. Attendance records not covered in the 5 CCR § 400

Permitted scholar records may be forwarded upon a request by a public or private school in which a scholar is enrolling. If the Charter School forwards the original permitted scholar record, a copy must be maintained by the Charter School until it is destroyed in accordance with this Policy. If the Charter School forwards a copy, the original must be maintained by the Charter

School until destroyed in accordance with this Policy.

Charter School shall update a **former** pupil's records to include the pupil's updated legal name or gender if the school district, charter school, or county office of education receives government-issued documentation, as described, demonstrating that the former pupil's legal name or gender has been changed.

Board Policy #: 28
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 28 – SCHOLAR POLICY – MATHEMATICS PLACEMENT POLICY

This Policy of the Compass Charter Schools Board of Directors ("Board") has been adopted to establish a fair, objective, and transparent protocol for placement in mathematics courses for scholars entering 9th grade, in order to ensure the success of every scholar and to meet the Legislative intent of the California Mathematics Placement Act of 2015.

1. In determining the mathematics course placement for entering 9th grade scholars, CCS systematically takes multiple objective academic measures of scholar performance into consideration, including:

    a. Statewide mathematics assessments, including interim and summative assessments through the California Assessment of Student Performance and Progress ("CAASPP").
    b. Internal assessments that are aligned to state-adopted content standards in mathematics.
    c. Classroom assignments and grades.
    d. Final grade in mathematics on the scholar's official, end of the year 8th grade report card.
    e. Results from all internal assessments, including at least one (1) placement checkpoint within the first month of the school year as described in Section 2, below.

2. CCS will provide at least one (1) placement checkpoint within the first month of the school year to ensure accurate placement and permit reevaluation of individual scholar progress. All mathematics teachers responsible for teaching 9th grade scholars will assess the mathematics placements for each 9th grade scholar assigned to the teacher's mathematics class. The teacher's assessment will take into consideration factors which may include, but are not limited to, the scholar's assignments, quizzes, tests, exams, grades, participation, and any comments provided by the scholar, the scholar's parent/legal guardian, and/or the scholar's other teachers regarding the scholar's mathematics placement. Based on the assessment, the teacher will then recommend that the scholar remain in the current mathematics placement or be transferred to another mathematics placement, in which case the teacher shall specify the mathematics course or level recommended for the scholar.

3. The CCS Superintendent & CEO, or designee, shall examine aggregate scholar placement data annually to ensure that scholars who are qualified to progress in mathematics courses based on their performance on objective academic measures included in Section 1 of this Policy are not held back in a disproportionate manner on the basis of their race, ethnicity, gender, or socioeconomic background. CCS shall annually report the aggregate results of this examination to the CCA Board.

4. CCS offers clear and timely recourse for each scholar and the scholar's parent or legal guardian who questions the scholar's placement, as follows:

    a. A parent/legal guardian of any 9th grade scholar may submit a written request to the CCS Superintendent & CEO, or his or her designee, that:
        i. Requests information regarding how the scholar's mathematics placement was determined. Within five (5) days of receipt of the written request, the CCS Superintendent & CEO or designee shall respond in writing to the parent/legal guardian's request by providing the information, including the objective academic measures that CCS relied upon in determining the scholar's mathematics placement.
        ii. Requests that the scholar retake the internal math assessment, in which case the Superintendent & CEO or designee will attempt to facilitate the retest within two (2) weeks.
        iii. Requests that the scholar retake the 8th grade end of course final mathematics assessment, in which case the Superintendent & CEO or designee will attempt to facilitate the retest within two (2) weeks.
        iv. Requests reconsideration of the scholar's mathematics placement based on objective academic measures. Within five (5) school days of receipt of the written request, the CCS Superintendent & CEO or designee shall respond in writing to the parent/legal guardian's request. The Superintendent & CEO or designee and the scholar's mathematics teacher must assess the objective academic measures provided by the parent in conjunction with the objective academic measures identified in Section 1 and 2 of this Policy. Based on this assessment, the Superintendent & CEO or designee must determine whether the most appropriate mathematics placement for the scholar is the scholar's current placement or another placement, in which case the Superintendent & CEO shall specify the mathematics course or level recommended for the scholar. The Superintendent & CEO's or designee's response must provide the determination as well as the objective academic measures that the Superintendent & CEO or designee relied upon in making that determination.
    b. Notwithstanding the foregoing, if the Superintendent & CEO or designee requires additional time to respond to a parent/legal guardian's request, the Superintendent & CEO or designee will provide a written response indicating that additional time is needed. In no event shall the Superintendent & CEO's or designee's response time exceed one (1) month.
    c. If, after reconsideration of the scholar's mathematics placement by the Superintendent & CEO's or designee, the parent/legal guardian is dissatisfied with the scholar's mathematics placement, the parent/legal guardian may choose to sign a voluntary waiver requesting that the scholar be placed in another mathematics course against the professional recommendation of the Superintendent & CEO or designee, acknowledging and accepting responsibility for this placement.

5. CCS shall ensure that this Mathematics Placement Policy is posted on its website.

6. This Policy is adopted pursuant to the Mathematics Placement Act of 2015, enacted as Education Code Section 51224.7.

Board Policy #: 29
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 29 – SCHOLAR POLICY – NONDISCRIMINATION STATEMENT

Compass Charter Schools ("CCS" or the "Charter School") does not discriminate against any person on the basis of actual or perceived disability, gender, gender identity, gender expression, nationality, race or ethnicity, citizenship, immigration status, religion, religious affiliation, sexual orientation, pregnancy status, or any other characteristic that is contained in the definition of hate crimes in the California Penal Code.

CCS adheres to all provisions of federal law related to scholars with disabilities, including, but not limited to, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990 ("ADA"), and the Individuals with Disabilities Education Improvement Act of 2004 ("IDEA").

CCS does not discourage students from enrolling or seeking to enroll in Charter School for any reason, including, but not limited to, academic performance, disability, neglect or delinquency, English proficiency, for being homeless or a foster/mobile youth, economic disadvantage, nationality, race, ethnicity, or sexual orientation. Charter School shall not encourage a student currently attending Charter School to disenroll or transfer to another school based on any of the aforementioned reasons except in cases of expulsion and suspension or involuntary removal in accordance with CCS's charter and relevant policies.

CCS does not request nor require student records prior to a student's enrollment.

CCS is committed to providing an educational atmosphere that is free of unlawful harassment under Title IX of the Education Amendments of 1972 (sex); Titles IV, VI, and VII of the Civil Rights Act of 1964 (race, color, or national origin); The Age Discrimination Act of 1975; the IDEA; and Section 504 and Title II of the ADA (mental or physical disability).

CCS also prohibits sexual harassment, including cyber sexual bullying, and harassment based upon pregnancy, childbirth or related medical conditions, race or ethnicity, religion, religious affiliation, creed, color, citizenship, immigration status, gender, gender identity, gender expression, national origin or ancestry, physical or mental disability, medical condition, marital status, age, sexual orientation, or any other basis protected by federal, state, local law, ordinance or regulation.

CCS does not condone or tolerate harassment of any type, including but limited to unlawful discrimination, intimidation, or bullying, including cyber sexual bullying, by any employee; independent contractor or other person with which CCS does business; scholar; volunteer; or community member regardless of position or gender. CCS will promptly and thoroughly investigate any complaint of harassment and take appropriate corrective action, if warranted.

The lack of English language skills will not be a barrier to admission or participation in CCS's programs or activities. CCS prohibits retaliation against anyone who files a complaint or who participates in a complaint investigation.

The Charter School's Nondiscrimination Statement relevant to employees is located within CCS's Employee Handbook.

Inquiries, complaints, or grievances regarding harassment as described in this section, above, should be directed to the Uniform Complaint Procedures ("UCP") Compliance Officer:

J.J. Lewis | Superintendent & CEO
850 Hampshire Road, Suite R
Thousand Oaks, California 91361
(818) 824-6233
jlewis@compasscharters.org

Board Policy #: 30
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 30 – SCHOLAR POLICY – PARENT AND FAMILY ENGAGEMENT POLICY

The parent and family engagement policy, which is separately approved annually, shall be included here as a Board Policy.

Board Policy #: 31
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 31 – SCHOLAR POLICY – SCHOLAR WELLNESS POLICY

The scholar wellness policy, which is separately approved annually, shall be included here as a Board Policy.

Board Policy #: 32
Adopted/Ratified: March 28, 2021
Revision Date: August 11, 2021

SECTION 32 – SCHOLAR POLICY – SCHOLAR SUCCESS TEAM POLICY

The Board of Directors of Compass Charter Schools ("CCS" or the "Charter School") recognizes there are scholars who may need additional support within the classroom both academically and behaviorally.

A Scholar Study Team ("SST") process utilizes a team of Charter School staff dedicated to identifying and supporting scholars who exhibit academic or behavioral problems by providing early systematic assistance to scholar and connect them to appropriate interventions and supports through the regular instructional setting.

An SST uses a systematic problem-solving approach to assist scholars with concerns which are interfering with success. The SST clarifies problems and concerns; develops strategies and organizes resources; provides a system for school accountability; and serves to assist and counsel the parent, teacher and scholar.

The SST process is a function of the general education program. All scholars can benefit from an SST, including but not limited to, those scholars achieving below or above grade level and scholars who have experienced emotional trauma, behavioral issues, or language issues.

Referral to an SST

A scholar may be referred to the SST process for any reason, including, but not limited to:

1. Lack of academic progress;
2. Increasing behavioral concerns;
3. Consideration for retention;
4. Attendance/truancy issues;
5. Parent concerns; and/or
6. Any other reason appearing to impact a scholar's access to education.

Any CCS teacher, staff member, or parent/guardian who has a concern for a scholar can refer that scholar to the SST for consideration.

SST Meeting

The purpose of the SST is to discuss issues and concerns related to a scholar's performance, identify intervention strategies which may help a scholar succeed, and monitor his or her progress to ensure learning and development. The team may suggest regular program interventions and/or support services available to all scholars. The SST may suggest and offer different supports that may include monitoring scholar progress, developing intervention plans, referring scholars to intervention services (e.g. reading or math specialists, counseling, etc.) and implementing increasing tiers of school-based intervention services, as necessary.

Anyone who is connected with the scholar can be included in the SST to provide information to share about the scholar's strengths, concerns and strategies which have been used in the past.

These people may include, but are not limited to, teachers, coordinators, directors, parents/guardians, counselors, doctors, administration, social workers, specialists, and/or law enforcement. The meeting is designed to bring out the best in the people involved.

The CCS SST meeting steps include, but are not limited to, the following:

1. Team members introduce themselves and their roles
2. Purpose and process of the meeting are stated
3. Timekeeper is appointed
4. Strengths of the scholar are identified
5. Concerns are discussed, clarified and listed
6. Pertinent information and modifications are listed
7. Concerns are synthesized with one or two chosen for focus
8. Strategies to deal with concerns are chosen; options are brainstormed
9. Team chooses best strategies to carry into actions
10. Individuals make commitments to actions
11. Person responsible and timelines for actions are recorded
12. Formalization of an SST intervention plan
13. Follow-up meeting date is set

Follow-up after an SST

After implementation of an SST intervention plan and follow up meeting, if the scholar continues to exhibit academic and/or behavioral concerns and/or should the scholar need additional supports, the SST may discuss making revisions to the scholar's intervention plan and/or providing the scholar with additional supports, or if necessary, the SST may refer the scholar for assessment for special education services and/or a Section 504 accommodation plan as applicable.

Board Policy #: 33
Adopted/Ratified: October 3, 2019
Revision Date: August 11, 2021

SECTION 33 – SCHOLAR POLICY – SECTION 504: POLICY, PROCEDURES, AND PARENT RIGHTS REGARDING IDENTIFICATION, EVALUATION AND EDUCATION

A. SECTION 504 POLICY

The Board of Directors of Compass Charter Schools recognizes the need to identify and evaluate scholars with disabilities in order to provide them with a free, appropriate public education and its legal responsibility to ensure that "no qualified person with a disability shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." This Policy and the related administrative regulations have been developed to ensure the implementation of Section 504 of the Rehabilitation Act of 1973 ("Section 504"), and its implementing regulations as amended, which pertains to public schools. The intent is to ensure that all scholars with disabilities, who are eligible under Section 504, are identified and evaluated and have access to a free, appropriate public education ("FAPE").

Under Section 504, individuals with physical or mental impairments that substantially limits one or more major life activities, including learning, are entitled to receive regular or special education and/or related aids and services designed to meet their individual needs as adequately as the needs of nondisabled scholars are met. Major Life Activities include functions such as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working, as well as the operation of a major bodily functions, including functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions. Scholars may be disabled and entitled to services under Section 504 even though they are not eligible for services pursuant to the Individuals with Disabilities Education Act Improvement Act of 2004 ("IDEA").

The Superintendent & CEO or designee shall ensure that this policy and set of procedures is implemented and followed. Whenever there is reason to believe that, because of a disability, a scholar needs regular or special education and/or related aids and services (and the scholar has not been found eligible under IDEA) that scholar will be evaluated under this policy's corresponding procedures.

A Section 504 Team will be convened to determine the scholar's need for regular or special education and/or related aids and services. The 504 Team will include persons knowledgeable about the Section 504 standards, the scholar's individual needs and school history, the meaning of evaluation data, and placement options. The scholar's parent/guardian shall be invited to participate in this 504 Team and shall receive notice of procedural safeguards guaranteed by law.

If CCS does not assess a scholar after a parent has requested an assessment, the Charter School shall provide notice of the parent's/guardian's procedural safeguards. CCS shall not retaliate in any way against parents/guardians or scholars who exercise any rights under the procedural safeguards and/or Section 504.

If the scholar, due to disability, is found to require regular or special education and/or related aids and services under Section 504, the Section 504 Team shall develop a 504 plan for the provision of such services to the scholar. The scholar shall be educated with nondisabled scholars to the maximum extent appropriate to the scholar's individual needs. The scholar's parent/guardian shall be provided a copy of the 504 plan and shall receive notice of procedural safeguards guaranteed by law. CCS shall periodically review the scholar's progress and placement.

CCS does not discriminate on the basis of disability or any other characteristic protected under law. CCS will implement this policy through its corresponding procedures.

B. SECTION 504 PROCEDURES

A. Definitions

1. **Academic Setting** – the regular, educational environment operated by CCS.

2. **Individual with a Disability under Section 504** – An individual who:
   a. has a physical or mental impairment that substantially limits one or more major life activities;
   b. has a record of such an impairment; or
   c. is regarded as having such an impairment.

3. **Evaluation** – procedures used to determine whether a scholar has a disability as defined within these Procedures, and the nature and extent of the services that the scholar needs. The term means procedures used selectively with an individual scholar and does not include basic tests administered to, or procedures used with all scholars in a school, grade or class.

4. **504 Plan** – is a plan developed to identify and document the scholar's needs for regular or special education and related aids and services for participation in educational programs, activities, and school–sponsored events.

5. **Free Appropriate Public Education** – the provision of regular or special education and related aids and services that are designed to meet the individual needs of persons with disabilities as adequately as the needs of persons without disabilities are met.

6. **Major Life Activities** – Functions such as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working. A major life activity also includes the operation of a major bodily function, including but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions.

7. **Physical or Mental Impairment** – Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory; including speech organs; cardiovascular; reproductive; digestive; genitor-urinary;

hemic and lymphatic; skin; and endocrine; or

a. Any mental or psychological disorder, such as intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

8. **504 Coordinator** – The Special Education Program Specialist shall serve as the Charter School's Section 504 Coordinator. The parents or guardians may request a Section 504 due process hearing from or direct any questions or concerns to the Section 504 Coordinator at (805) 413-6657.

9. **Has a record of such an impairment** - means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

10. **Is regarded as having an impairment** - means

a. An individual meets the requirement of 'being regarded as having such an impairment' if the individual establishes that he or she has been subjected to an action prohibited under this Act because of an actual or perceived physical or mental impairment whether or not the impairment limits or is perceived to limit a major life activity.

b. Being regarded as having an impairment shall not apply to impairments that are transitory and minor. A transitory impairment is an impairment with an actual or expected duration of 6 months or less.

B. Referral, Assessment and Evaluation Procedures

1. CCS will evaluate any scholar who, because of disability, needs or is believed to need regular or special education and/or related aids and services.

2. A scholar may be referred by anyone, including a parent/guardian, teacher, other school employee or community agency, for consideration as to whether the scholar qualifies as a scholar with disabilities under Section 504. Requests for evaluation shall be made in writing, and a copy of said request will remain in the scholar's file regardless of the final determination. This referral should be made to the Section 504 Coordinator who will convene a 504 Team. Any requests made to another School employee will be forwarded to the Section 504 Coordinator.

3. CCS has the responsibility to ensure that scholars with disabilities are evaluated. Therefore, it is important that scholars who have or may have a disability are referred to the Section 504 Coordinator so that the assessment process is initiated.

4. The 504 Team convened by the Section 504 Coordinator will be composed of the scholar's parents/guardians and other persons knowledgeable about the scholar (such as the scholar's regular education teachers), the scholar's school history, the scholar's individual needs (such as a person knowledgeable about the scholar's disabling condition), the meaning of evaluation data, the options for placement and services, and the legal requirements for least restrictive environment and comparable facilities.

5. The 504 Team shall promptly consider the referral and determine what assessments are needed in all suspected areas of disability to evaluate whether the scholar is a

scholar with a disability under Section 504 and what special needs the scholar may have. The decision regarding what assessments shall be undertaken shall be based on a review of the scholar's school records (including academic, social and behavioral records), any relevant medical records, and the scholar's needs. Scholars requiring assessment shall be provided appropriate assessments administered by qualified assessment specialists.

6. The 504 Team will consider the following information in its evaluation of the scholar:
   a. Tests and other evaluation materials that have been validated for the specific purpose for which they are used and are administered by trained personnel;
   b. Tests and other evaluation materials including those tailored to assess specific areas of educational need and not merely those which are designed to provide a single general intelligence quotient; and
   c. Tests are selected and administered so as to best ensure that, when a test is administered to a scholar with impaired sensory, manual, or speaking skills, the test results accurately reflect the scholar's aptitude or achievement level or whatever factor the test purports to measure, rather than reflecting the scholar's impaired sensory, manual, or speaking skills (except where those skills are the factors that the test purports to measure.)

7. The evaluation of the scholar must be sufficient for the 504 Team to accurately and completely describe:
   a. the nature and extent of the disabilities;
   b. the scholar's special needs
   c. the impact upon the scholar's education

8. what regular or special education and/or related aids and services are appropriate to ensure that the scholar receives a free appropriate public education. All significant factors relating to the learning process for that scholar, including adaptive behavior and cultural and language background, must be considered. The evaluation may include, but is not limited to, classroom and playground observation, performance-based testing, academic assessment information, and data offered by the scholar's teachers and parent/guardian.
   a. Mitigating measures cannot be considered when evaluating whether or not a scholar has a substantially limiting impairment. Mitigating measures could include medications, prosthetic devices, assistive devices, or learned behavioral or adaptive neurological modifications a scholar uses to eliminate or reduce the effects of an impairment.

9. The parents/guardians shall be given an opportunity in advance of 504 Team meetings to examine assessment results and all other relevant records.

10. If a request for evaluation is denied, the 504 Team shall inform the parents/guardians in writing of this decision and of their procedural rights as described below.

C. <u>504 PLAN</u>

1. When a scholar is identified as having a disability within the meaning of Section 504, the 504 Team shall determine what, if any, services are needed to ensure that the

scholar receives a FAPE.

2. The 504 Team responsible for making the placement decision shall include the parents/guardians and other persons knowledgeable about the child, the meaning of the evaluation data, and the placement options.

3. For each identified eligible scholar, the 504 Team will develop a 504 Plan describing the scholar's disability and the regular or special education and/or related aids and services needed. The Plan will specify how the special education and/or related aids and services will be provided to the eligible scholar and by whom. The 504 Plan will also identify the person responsible for ensuring that all the components of the Plan are implemented.

4. The scholar's teacher and any other staff who are to provide services to the scholar or who are to make modifications in the classroom for the scholar shall be informed of the services or modifications necessary for the scholar and, if appropriate, provided a copy of the 504 Plan. A copy of this plan shall be kept in the scholar's cumulative file in a manner that limits access to those persons involved in the 504 process and/or the provision of services and modifications.

5. The eligible scholar shall be placed in the regular education environment unless it is demonstrated that the scholar's needs cannot be met in the regular education environment with supplementary aids and services. The scholar shall be educated with scholars who are not disabled to the maximum extent appropriate to his/her individual needs.

6. The referral, assessment, evaluation and placement process will be completed within a reasonable time. It is generally not reasonable to exceed fifty (50) school days in completing this process.

7. The parents/guardians shall be notified in writing of the final decision concerning the scholar's identification as a person with disabilities, the educational program and services to be provided, if any, and of the Section 504 procedural safeguards, as described below, including the right to an impartial hearing to challenge the decision.

8. If the 504 Team determines that the scholar has a disability but that no special services are necessary for the scholar, the 504 Plan shall reflect the identification of the scholar as a person with a disability under Section 504 and shall state the basis for the decision that no special services are presently needed.

9. The 504 Plan shall include a schedule for annual review of the scholar's needs and indicate that this review may occur more frequently at the request of the parent/guardian or school staff.

10. CCS shall immediately implement a scholar's prior 504 Plan, when a scholar enrolls at the School. Within thirty (30) days of starting school, CCS shall schedule a 504 Team meeting to review the existing 504 Plan. CCS shall request a copy of the prior 504 plan from both the prior school and the parent/guardian.

D. Review of the Scholar's Progress

1. The 504 Team shall monitor the progress of the eligible scholar and the effectiveness of the scholar's 504 Plan. According to the review schedule set out in the scholar's 504 Plan, the 504 Team shall annually determine whether the services and modifications are appropriate.

2. A reevaluation of the scholar's needs shall be conducted before any subsequent significant change in placement.

E. Procedural Safeguards

1. Parents/guardians shall be notified in writing of all decisions regarding the identification, evaluation or educational placement of scholars with disabilities or suspected disabilities. Notifications shall include a statement of their rights to:
   - Examine relevant records
   - Have an impartial hearing with an opportunity for participation by the parents/guardians and their counsel
   - Have the right to file a Uniform Complaint pursuant to school policy
   - Seek review in federal court if the parents/guardians disagree with the hearing decision.

2. Notifications shall also set forth the procedures for requesting an impartial hearing. Requests shall be made to the following:

   Dawn Anglemyer | Scholar Support Coordinator
   850 Hampshire Road, Suite R
   Thousand Oaks, California 91361
   (805) 341-1656
   danglemyer@compasscharters.org

   Notifications shall also advise that reimbursement for attorney's fees is available only as authorized by law.

3. The Superintendent & CEO or designee shall maintain a list of impartial hearing officers who are qualified and willing to conduct Section 504 hearings. To ensure impartiality, such officers shall not be employed by or under contract with CCS or employed by the El Dorado County Charter SELPA or the County Office of Education of the county in which the Charter School is located in any capacity other than that of hearing officer and shall not have any professional or personal involvement that would affect their impartiality or objectivity in the matter.

4. If a parent/guardian disagrees with the identification, evaluation or educational placement of a scholar with disabilities under Section 504, he/she may request a hearing to initiate due process procedures. The parent/guardian shall set forth in writing his/her request for a hearing. A request for hearing should include:

- The specific decision or action with which the parent/guardian disagrees.
- The changes to the 504 Plan the parent/guardian seeks.
- Any other information the parent/guardian believes is pertinent.

5. Within five (5) calendar days of receiving the parent/guardian's request for a hearing, CCS may offer the parent/guardian an optional alternative dispute resolution process. However, the timeline for the hearing shall remain in effect unless it is extended by mutual written agreement of the parent/guardian and the Charter School. Alternative dispute resolution options include:
   - Mediation by a neutral third party.
   - Review of the 504 Plan by the Superintendent & CEO or designee.

6. Within ten (10) calendar days of receiving the parent/guardian's request, the Superintendent & CEO or designee shall select an impartial hearing officer. These 10 days may be extended for good cause or by mutual agreement of the parent/guardian and Superintendent & CEO.

7. Within thirty-five (35) calendar days of the selection of the hearing officer, the due process hearing shall be conducted. These thirty-five (35) days may be extended for good cause or by mutual agreement of the parent/guardian and Superintendent & CEO.

8. The parent/guardian and the Charter School shall be afforded the rights to:
   - Be accompanied and advised by counsel and by individuals with special knowledge or training related to the individual needs of scholars who are qualified as having a disability under Section 504.
   - Present written and oral evidence.
   - Question and cross-examine witnesses.
   - Receive written findings by the hearing officer.

9. The hearing officer shall issue a written decision within ten (10) calendar days of the hearing.

10. If desired, either party may seek a review of the hearing officer's decision by a federal court. The decision shall be implemented unless the decision is stayed, modified or overturned by a court.

11. CCS shall not retaliate in any way against parents/guardians or scholars who exercise any rights under the procedural safeguards and/or Section 504.

F. Suspension and Expulsion, Special Procedures for Scholars with Disabilities

CCS shall follow the suspension and expulsion policy and procedures as set forth in the charter. A pupil who is qualified for services under Section 504 of the Rehabilitation Act of 1973 is subject to the same grounds for disciplinary action, including suspension and expulsion, and is accorded the same due process procedures applicable to regular education pupils except when federal and state law mandates additional or different procedures. CCS will follow Section 504 and all applicable

federal and state laws when imposing any form of discipline on a pupil identified as an individual with disabilities or for whom the School has a basis of knowledge of a suspected disability or who is otherwise qualified for such services or protections in according due process to such pupils. The following procedures shall be followed when a scholar with a disability is considered for suspension or expulsion. These procedures will be updated if there is a change in the law.

1. Services During Suspension

Scholars suspended for more than ten (10) school days in a school year shall continue to receive services so as to enable the scholar to continue to participate in the general education curriculum, although in another setting, and to progress toward meeting the goals set out in the child's 504 Plan; and receive, as appropriate, a functional behavioral assessment ("FBA") and behavioral intervention services and modifications, that are designed to address the behavior violation so that it does not recur. These services may be provided in an interim alternative educational setting.

2. Procedural Safeguards/Manifestation Determination

Within ten (10) school days of a recommendation for expulsion or any decision to change the placement of a child with a disability because of a violation of a code of scholar conduct, CCS, the parent, and relevant members of the 504 Team shall review all relevant information in the scholar's file, including the child's 504 Plan, any teacher observations, and any relevant information provided by the parents to determine:

a. If the conduct in question was caused by, or had a direct and substantial relationship to, the child's disability; or
b. If the conduct in question was the direct result of the local educational agency's failure to implement the 504 Plan.
c. If CCS, the parent, and relevant members of the 504 Team determine that either of the above is applicable for the child, the conduct shall be determined to be a manifestation of the child's disability.
d. If CCS, the parent, and relevant members of the 504 Team make the determination that the conduct was a manifestation of the child's disability, the 504 Team shall:
e. Conduct an FBA and implement a behavioral intervention plan ("BIP") for such child, provided that CCS had not conducted such assessment prior to such determination before the behavior that resulted in a change in placement;
f. If the child has a BIP, review the BIP and modify it, as necessary, to address the behavior; and
g. Return the child to the placement from which the child was removed, unless the parent and CCS agree to a change of placement as part of the modification of the BIP.
h. If CCS, the parent, and relevant members of the 504 team determine that the behavior was not a manifestation of the scholar's disability and that the conduct in question was not a result of the failure to implement the 504 Plan, then CCS may apply the relevant disciplinary procedures to children with disabilities in the same manner and for the same duration as the procedures would be applied to scholars without disabilities.

3. Appeals

The parent/guardian of a child with a disability under a 504 Plan who disagrees with any decision regarding placement, or the manifestation determination, or if CCS believes that maintaining the current placement of the child is substantially likely to result in injury to the child or to others, either party may request to utilize the appeal process outlined in the Procedural Safeguards section of these Procedures.

When an appeal relating to the placement of the scholar or the manifestation determination has been requested by either the parent or CCS, the scholar shall remain in the interim alternative educational setting pending the decision of the hearing officer in accordance with state and federal law, including 20 U.S.C. Section 1415(k) until the expiration of the forty-five (45) day time period provided for in an interim alternative educational setting, unless the parent and CCS agree otherwise.

4. Special Circumstances

CCS personnel may consider any unique circumstances on a case-by-case basis when determining whether to order a change in placement for a child with a disability who violates a code of scholar conduct.

The Superintendent & CEO or designee may remove a scholar to an interim alternative educational setting for not more than forty-five (45) days without regard to whether the behavior is determined to be a manifestation of the scholar's disability in cases where a scholar:

a. Carries or possesses a weapon, as defined in 18 U.S.C. § 930, to or at school, on school premises, or to or at a school function;
b. Knowingly possesses or uses illegal drugs, or sells or solicits the sale of a controlled substance, while at school, on school premises, or at a school function; or
c. Has inflicted serious bodily injury, as defined by 20 U.S.C. § 1415(k)(7)(D), upon a person while at school, on school premises, or at a school function.

5. Interim Alternative Educational Setting

The scholar's interim alternative educational setting shall be determined by the scholar's 504 Team.

6. Procedures for Scholars Not Yet Eligible for Special Education Services

A scholar who has not been identified as an individual with disabilities pursuant to the IDEA 2004 and who has violated CCS's disciplinary procedures may assert the procedural safeguards granted under these Procedures only if CCS had knowledge that the scholar had a disability was disabled before the behavior occurred.

CCS shall be deemed to have knowledge that the scholar had a disability if one of the following conditions exists:

a. The parent/guardian has expressed concern in writing, or orally if the parent/guardian does not know how to write or has a disability that prevents a written statement, to CCS supervisory or administrative personnel, or to one of the child's teachers, that the scholar is in need of special education or related services.
b. The parent has requested an evaluation of the child.

c. The child's teacher, or other CCS personnel, has expressed specific concerns about a pattern of behavior demonstrated by the child, directly to the Director of Special Education or to other CCS supervisory personnel.
d. If CCS knew or should have known the scholar had a disability under any of the three (3) circumstances described above, the scholar may assert any of the protections available to IDEA 2004-eligible children with disabilities, including the right to stay-put.
e. If CCS had no basis for knowledge of the scholar's disability, it shall proceed with the proposed discipline. CCS shall conduct an expedited evaluation if requested by the parent/guardian; however, the scholar shall remain in the education placement determined by CCS pending the results of the evaluation.

CCS shall not be deemed to have knowledge of that the scholar had a disability if the parent has not allowed an evaluation, refused services, or if the scholar has been evaluated and determined to not be eligible.

C. PARENT/STUDENT RIGHTS IN IDENTIFICATION, EVALUATION, ACCOMMODATION AND PLACEMENT

The following is a description of the rights granted by federal law to scholars with disabilities. The intent of the law is to keep you fully informed concerning decisions about your child and to inform you of your rights if you disagree with any of these decisions. Please keep this explanation for future reference.

You have the right to:

1. Have your child take part in and receive benefits from public education programs without discrimination because of his/her disabling condition.
2. Have CCS advise you of your rights under federal law.
3. Receive notice with respect to Section 504 identification, evaluation and/or placement of your child.
4. Have your child receive a free appropriate public education. This includes the right to be educated with non-disabled scholars to the maximum extent appropriate. It also includes the right to have CCS make reasonable accommodations to allow your child an equal opportunity to participate in school and school-related activities.
5. Have your child educated in facilities and receive services comparable to those provided to non-disabled scholars.
6. Have your child receive special education and related services if he/she is found to be eligible under the Individuals with Disabilities Education Improvement Act ("IDEA").
7. Have an evaluation, educational recommendation, and placement decision developed by a team of persons who are knowledgeable of the scholar, the assessment data, and any placement options. This includes the right to an evaluation before the initial placement of the scholar and before any subsequent significant change in placement.
8. Have your child be given an equal opportunity to participate in non-academic and extracurricular activities offered by CCS.
9. Examine all relevant records relating to decisions regarding your child's Section 504 identification, evaluation, educational program, and placement.
10. Obtain copies of educational records at a reasonable cost unless the fee would

effectively deny you access to the records.

11. Obtain a response from CCS to reasonable requests for explanations and interpretations of your child's records.
12. Request an amendment of your child's educational records if there is reasonable cause to believe they are inaccurate, misleading or otherwise in violation of the privacy rights of your child. If CCS refuses this request for amendment, the School shall notify you within a reasonable time and advise you of your right to an impartial hearing.
13. Request mediation or file a grievance in accordance with CCS's Section 504 mediation grievance and hearing procedures, outline above.
14. Request an impartial hearing regarding the Section 504 identification, evaluation, or placement of your child. You and the scholar may take part in the hearing and have an attorney represent you.
15. File a formal complaint pursuant to CCS's Uniform Complaint Policy and Procedures. Please ask the Superintendent & CEO for a copy of the Charter School's Uniform Complaint Policy and Procedures if you need one.
16. File a formal complaint with the U.S. Department of Education.

Office for Civil Rights, U.S. Department of Education
San Francisco Office
50 United Nations Plaza
San Francisco, CA 94102
(415) 486-5555 PHONE
(415) 486-5570 FAX
Email: OCR.SanFrancisco@ed.gov

17. Be free from any retaliation from CCS for exercising any of these rights. Please contact Dawn Anglemyer – Scholar Support Coordinator, c/o Compass Charter Schools, 850 Hampshire Rd. Suite R, Thousand Oaks, CA 91361 with any questions regarding the information contained herein.

Board Policy #: 34
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 34 – SCHOLAR POLICY – SPECIAL EDUCATION FOR CHARTER SCHOOLS ACTING AS AN INDEPENDENT LOCAL EDUCATIONAL AGENCY FOR PURPOSES OF SPECIAL EDUCATION

The Board of Directors of the Compass Charter Schools recognizes the need to identify, evaluate, and serve scholars with disabilities in order to provide them with a free appropriate public education in the least restrictive environment. Accordingly, this Policy has been adopted consistent with Education Code section 56195.8.

Identification, Referral, and Evaluation for Special Education

CCS shall follow applicable state and federal law and regulations and El Dorado County Charter Special Education Local Plan Area ("SELPA") policy with respect to the identification, referral, and assessments of scholars for special education and related services.

Individualized Education Program ("IEP") Team Meetings

CCS shall convene IEP team meetings with the legally required composition within all legally applicable timelines, in accordance with state and federal law and regulations and SELPA policy.

CCS shall also review, at the request of a scholar's general or special education teacher, the assignment of an individual with exceptional needs to his/her class and a mandatory meeting of the IEP team shall be convened if the review indicates a change to the scholar's placement, instruction, related services, or any combination thereof may be required. The Superintendent & CEO or his or her designee shall be responsible for completing the review within fifteen (15) school days of the teacher's request.

Procedural Safeguards

Parents/guardians shall receive written notice of their rights in accordance with state and federal law and regulation, and SELPA policy.

Please see https://charterselpa.org/parent-resources/ for a copy of your procedural safeguards.

Nonpublic, Nonsectarian Services

CCS may contract with state-certified nonpublic, nonsectarian schools or agencies to provide special education services or facilities when an appropriate public education program at CCS is not available. When entering into agreements with nonpublic, nonsectarian schools or agencies, CCS shall consider the needs of the individual scholar and the recommendations of the IEP team. The IEP team shall remain accountable for monitoring the progress of scholars placed in nonpublic, nonsectarian programs towards the goals identified in each scholar's IEP.

CCS shall follow state and federal law and regulations and SELPA policy when contracting with nonpublic, nonsectarian schools or agencies.

Resource Specialist Program

CCS shall employ or contract with certificated resource specialists to provide services for scholars with disabilities which shall include, but not be limited to:

1. Providing instruction and services to scholars whose needs have been identified in an IEP developed by the IEP team and who are assigned to regular classroom teachers for a majority of the school day. Scholars shall not be enrolled in a resource specialist program for the majority of the school day without approval of the IEP team;
2. Providing information and assistance to scholars with disabilities and their parents/guardians;
3. Providing consultation, resource information, and material regarding scholars with disabilities to their parents/guardians and regular education staff members;
4. Coordinating special education services with the regular school programs for each scholar with disabilities enrolled in the resource specialist program;
5. Monitoring scholar progress on a regular basis, participating in the review and revision of IEPs as appropriate, and referring scholars who do not demonstrate appropriate progress to the IEP team;
6. At the secondary school level, emphasizing academic achievement, career and vocational development, and preparation for adult life; and
7. Resource specialists shall not simultaneously be assigned to serve as resource specialists and to teach regular classes.

CCS's resource specialist program shall be under the direction of a resource specialist who possesses:

1. A special education credential or clinical services credential with a special class authorization;
2. Three or more years of teaching experience, including both regular and special education teaching experience, as defined by rules and regulations of the Commission on Teacher Credentialing; and
3. Demonstration of competencies required for a resource specialist as established by the Commission on Teacher Credentialing.

The Superintendent & CEO shall ensure that caseloads for special education teachers are within the maximum caseloads established by law, collective bargaining agreement, and/or SELPA policy.

No resource specialist shall have a caseload which exceeds 28 scholars, unless a valid waiver is obtained through the State Board of Education, consistent with Title 5, California Code of Regulations, Section 3100.

Transportation

CCS shall ensure appropriate, no cost transportation services are provided for scholars with disabilities as specified in their IEP as a related service when required. The specific needs of the scholar shall be the primary consideration when an IEP team is determining the scholar's transportation needs. Considerations may include, but are not limited to, the scholar's health needs, travel distances, physical accessibility and safety of streets and sidewalks, accessibility of public transportation systems, midday or other transportation needs, extended-year services, and, as necessary, implementation of a behavioral intervention plan. Mobile seating devices, when

used, shall be compatible with the securement systems required by Federal Motor Vehicle Safety Standard No. 222 (49 C.F.R. 571.222). CCS shall ensure school bus drivers are trained in the proper installation of mobile seating devices in the securement systems.

The Superintendent & CEO or designee shall arrange transportation schedules so that scholars with disabilities do not spend an excessive amount of time on buses compared to other scholars. Arrivals and departures shall not reduce the length of the school day for these scholars except as may be prescribed on an individual basis.

When contracting with a nonpublic, nonsectarian school or agency to provide special education services, the Superintendent & CEO or designee shall ensure that the contract includes general administrative and financial agreements related to the provision of transportation services if specified in the scholar's IEP.

Guide dogs, signal dogs and service dogs trained to provide assistance to disabled persons may be transported in a school bus when accompanied by disabled scholars, disabled teachers or persons training the dogs.

CCS shall ensure that all school buses, school pupil activity buses, youth buses and child care motor vehicles are equipped with an operational child safety alert system. CCS shall ensure that all buses are equipped with a passenger restraint system.

Information on the Number of Individuals With Exceptional Needs

Information regarding the number of individuals with exceptional needs who are being provided special education and related services shall be provided in accordance with state and federal law and regulation and SELPA policy.

Board Policy #: 35
Adopted/Ratified: October 9, 2019
Revision Date:

SECTION 35 – SCHOLAR POLICY – SCHOLAR FREEDOM OF SPEECH AND EXPRESSION POLICY

The Board of Directors of Compass Charter School respects scholars' rights to express ideas and opinions, take stands, and support causes, whether controversial or not, through their speech, writing, printed materials, including the right of expression in official publications, and/or the wearing of buttons, badges and other insignia.

A. <u>On-Campus Expression</u>

Scholar free speech rights include, but are not limited to, the use of bulletin boards, the distribution of printed materials or petitions, the wearing of buttons, badges, and other insignia, and the right of expression in official publications, whether or not the publications or other means of expression are supported financially by the school or by use of school facilities. Scholar expression on the Charter School website and online media shall generally be afforded the same protections as print media within the Policy.

Scholar freedom of expression shall be limited only as allowed by state and federal law in order to maintain an orderly school environment and to protect the rights, health, and safety of all members of the school community. Unprotected Expression includes the following:

1. **Obscenity**: when the (1) average person applying current community standards finds the work as a whole appeals to the prurient interest, (2) the work is patently offensive, and (3) the work lacks serious literary, artistic, political, or scientific value. Examples include pornography or sexually explicit material.

2. **Defamation:** Libel (written defamation) and Slander (oral defamation), which includes but is not limited to inaccurately attributing a statement to another, either on purpose for public officials (which includes Charter School staff) or by mistake for private officials, that mischaracterizes the statement.

3. **Discriminatory Material**: material that demeans a person or group because of the person/group's disability, pregnancy, gender, gender identity, gender expression, nationality, ancestry, race or ethnicity, immigration status, religion, religious affiliation, sexual orientation, childbirth or related medical conditions, marital status, age, or association with a person or group with one or more of these actual or perceived characteristics or any other basis protected by federal, state, local law, ordinance or regulation that has the purpose of humiliating, offending, or provoking a person/group.

4. **Harassment (including sexual harassment), Intimidation and/or Bullying:** severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act. Bullying includes one or more acts committed by a scholar or group of scholars that may constitute sexual harassment, hate violence, or creates an intimidating and/or hostile educational environment, directed toward one or more

scholars that has or can be reasonably predicted to have the effect of one or more of the following: (1) placing a reasonable scholar or scholars in fear of harm to that scholar's or those scholars' person or property, (2) causing a reasonable scholar to experience a substantially detrimental effect on his or her physical or mental health, (3) causing a reasonable scholar to experience a substantial interference with his or her academic performance, (4) causing a reasonable scholar to experience a substantial interference with his or her ability to participate in or benefit from the services, activities, or privileges provided by the Charter School.

5. **Fighting Words**: words likely to cause (1) the average person to fight or (2) the creation of a clear and present danger of violence, unlawful acts in violation of lawful school regulations, or the substantial disruption of school.

6. **Vulgarity and/or Profanity:** the continual use of curse words by a scholar, even after warning.

7. **Violating Privacy**: publicizing or distributing confidential or private material without permission.

Distribution of Circulars, Un-Official Newspapers, and Other Printed Matter

Free inquiry and exchange of ideas are essential parts of a democratic education. Scholars shall be allowed to distribute circulars, leaflets, newspapers, and pictorial or other printed matter, and to circulate petitions, subject to the following specific limitations:

1. Leaflets, pictorial and other printed matter to be distributed shall be submitted to the Charter School Superintendent & CEO or designee at least one (1) school day prior to distribution. The Charter School Superintendent & CEO or designee shall review material submitted in a reasonable amount of time and shall allow the approved material to be distributed according to the time and manner established by this Policy. Any scholar may appeal the decision of the Charter School Superintendent & CEO or designee to the Board who shall render a decision within a reasonable period of time after receipt of the appeal. The appeal by the scholar must be made within five (5) school days from the time the unsatisfactory decision was rendered.

2. Distribution, free or for a fee, may take place before school, after school, and/or during lunch provided there is no substantial disruption in the school programs (as determined by the Charter School Superintendent & CEO). Distribution may not occur during instructional time and should not occur in locations that disrupt the normal flow of traffic within the school or at school entrances.

3. The manner of distribution shall be such that coercion is not used to induce scholars to accept the printed matter or to sign petitions.

4. The solicitation of signatures must not take place in instructional classes or school offices, nor be substantially disruptive to the school program (as determined by the Charter School Superintendent & CEO or designee).

The Charter School Superintendent & CEO or designee shall work with scholar government representatives in the development of these procedures. Scholar responsibilities shall be

emphasized.

Official School Publications
Scholar editors of official school publications shall be responsible for assigning and editing the news, editorial, and feature content of their publications subject to the limitations of this Policy. However, it shall be the responsibility of the journalism staff adviser(s) of scholar publications to supervise the production of the scholar staff, to maintain professional standards of English and journalism, and to maintain the provisions of this Policy. [3] The journalism staff adviser(s) shall help the scholar editors judge the literary value, newsworthiness and propriety of materials submitted for publication.

There shall be no prior restraint of material prepared for official school publications except insofar as it violates this Policy. CCS officials shall have the burden of showing justification without undue delay prior to a limitation of scholar expression under Policy. If the journalism staff adviser(s) consider material submitted for publication to violate this Policy, he or she will notify the scholar without undue delay and give specific reasons why the submitted material may not be published. The scholar should be given the opportunity to modify the material or appeal the decision of the journalism staff adviser to the Charter School Superintendent & CEO.

Buttons, Badges, and Other Insignia of Symbolic Expression
Scholars shall be permitted to wear buttons, badges, armbands, and other insignia as a form of expression, subject to the prohibitions enumerated in this Policy.

Use of Bulletin Boards
Scholars will be provided with bulletin boards, upon request and subject to availability, for use in posting scholar materials on campus locations convenient to scholar use. Where feasible, the location and quantity of such bulletin boards shall be by mutual agreement of scholar government representatives and CCS administration. Posted material must be in compliance with other sections of this Policy, particularly regarding the distribution of materials and prohibited speech. Scholars may not post or distribute materials regarding the meetings of non-curricular scholar-initiated groups.

Organized Demonstrations
Scholars have the right to lawful organized on-campus demonstrations, subject to the provisions of this Policy and applicable law. Demonstrations that incite scholars to create a clear and present danger of the commission of unlawful acts on school premises or the violation of lawful school regulations, or demonstrations that substantially disrupt the orderly operation of the school are prohibited.

No organized demonstrations by school groups may take place during school hours off the school campus unless sanctioned by school authorities and supervised by a designated school authority. No individual scholar may demonstrate in the name of the Charter School or as an official school group at any time unless authorized by the Charter School to participate in the activity.

Missing school to attend an organized demonstration is not an excused absence. The Charter

[3] "Official school publications" refers to material produced by scholars in the journalism, newspaper, yearbook, or writing classes and distributed to the scholar body either free or for a fee.

School will follow its Attendance Policy when determining consequences for scholars which may include but are not limited to detention, a low grade for a missed test, or receiving a truancy letter. The Charter School will follow its Suspension and Expulsion Policy when determining consequences for scholars if Charter School policy is violated.

B. Off-Campus Expression

Off-campus scholar expression, including but not limited to scholar expression on off-campus internet web sites, is generally constitutionally protected but shall be subject to discipline when such expression poses a threat to the safety of other scholars, staff, or school property, or substantially disrupts the educational program. The Charter School Superintendent & CEO or designee shall document the impact the expression had or could be expected to have on the educational program.

C. Enforcement

1. Scholars who are considering actions in the areas covered by this Policy should be informed of the possible consequences of their action under each specific circumstance. The Charter School Superintendent & CEO shall ensure that due process is followed when resolving disputes regarding scholar freedom of expression.

2. This Policy does not prohibit or prevent the CCS Governing Board from adopting otherwise valid rules and regulations relating to oral communications by scholars upon the CCS campus.

3. No CCS employee shall be dismissed, suspended, disciplined, reassigned, transferred, or otherwise retaliated against solely for acting to protect a scholar engaged in the conduct authorized under this Policy, or refusing to infringe upon conduct that is authorized under this Policy, the First Amendment to the United States Constitution, or Section 2 of Article I of the California Constitution.

4. CCS shall not make or enforce a rule subjecting a high school scholar to disciplinary sanctions solely on the basis of conduct that is speech or other communication that, when engaged in outside of the campus, is protected from governmental restriction by the First Amendment to the United States Constitution or Section 2 of Article I of the California Constitution.

D. Complaints

A scholar who feels his/her freedom of expression was unconstitutionally limited and/or limited on the basis of discrimination may file a complaint with CCS through following the Charter School's General Complaint Policies and Procedures.

Board Policy #: 36
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 36 – SCHOLAR POLICY –SCHOLAR USE OF TECHNOLOGY POLICY

The Board of Directors of Compass Charter Schools finds that new technologies are modifying the way in which information may be accessed, communicated and transferred. Those changes also alter instruction and scholar learning. The Charter School offers scholars access to technologies that may include reimbursement of Internet access, electronic mail, and equipment, such as computers, tablets, or other multimedia hardware. By its adoption of this Policy, the Board intends that technological resources provided by the Charter School be used in a safe, responsible, and proper manner in support of the instructional program and for the advancement of scholar learning.

Educational Purpose

Use of Charter School equipment and access to the Internet via Charter School equipment and resource networks is intended to serve and pursue educational goals and purposes. Scholar use of the Internet is therefore limited to only those activities that further or enhance the delivery of education. Scholars and staff have a duty to use Charter School resources only in a manner specified in the Policy.

"Educational purpose" means classroom activities, research in academic subjects, career or professional development activities, Charter School approved personal research activities, or other purposes as defined by the Charter School from time to time.

"Inappropriate use" means a use that is inconsistent with an educational purpose or that is in clear violation of this policy and the Acceptable Use Agreement.

Notice and Use

The Charter School shall notify scholars and parents/guardians about authorized uses of Charter School computers, user obligations and responsibilities, and consequences for unauthorized use and/or unlawful activities.

Before a scholar is authorized to use the Charter School's technological resources, the scholar and his/her parent/guardian shall sign and return the Acceptable Use Agreement specifying user obligations and responsibilities. In that agreement, the scholar and his/her parent/guardian shall agree not to hold the Charter School or any Charter School staff responsible for the failure of any technology protection measures, violations of copyright restrictions, or user mistakes or negligence. They shall also agree to indemnify and hold harmless the Charter School and Charter School personnel for any damages or costs incurred.

Safety

The Charter School shall ensure that all Charter School computers with Internet access have a technology protection measure that blocks or filters Internet access to websites that have no educational purpose and/or contain visual depictions that are obscene, constitute child pornography, or that are harmful to minors. While the Charter School is able to exercise reasonable control over content created and purchased by the Charter School, it has limited

control over content accessed via the internet and no filtering system is 100% effective. Neither the Charter School nor its staff shall be responsible for the failure of any technology protection measures, violations of copyright restrictions, or user mistakes, misuse or negligence.

To reinforce these measures, the Superintendent & CEO or designee shall implement rules and procedures designed to restrict scholars' access to harmful or inappropriate matter on the Internet and to ensure that scholars do not engage in unauthorized or unlawful online activities. Staff shall monitor scholars while they are using online services and may have teacher aides, scholar aides, and volunteers assist in this monitoring.

The Superintendent & CEO or designee also shall establish regulations to address the safety and security of scholars and scholar information when using email, chat rooms, and other forms of direct electronic communication.

The Superintendent & CEO or designees shall provide age-appropriate instruction regarding safe and appropriate behavior on social networking sites, chat rooms, and other Internet services. Such instruction shall include, but not be limited to, maintaining the scholar's online reputation and ensuring their personal safety by keeping their personal information private, the dangers of posting personal information online, misrepresentation by online predators, how to report inappropriate or offensive content or threats, behaviors that constitute cyberbullying, and how to respond when subjected to cyberbullying as defined in the Charter School's charter. Scholars are expected to follow safe practices when using Charter School technology.

Scholars shall not use the Internet to perform any illegal act or to help others perform illegal acts. Illegal acts include, but are not limited to, any activities in violation of local, state, and federal law and/or accessing information designed to further criminal or dangerous activities. Such information includes, but is not limited to, information that if acted upon could cause damage, present a danger, or cause disruption to the Charter School, other scholars, or the community. Damaging, debilitating or disabling computers, computer networks or systems through the intentional or overuse of electronic distribution or the spreading of computer viruses or other harmful programs shall be prohibited. Any unauthorized online access to other computers by means of hacking into other computers, downloading hacker tools such as port scanners and password crackers designed to evade restrictions shall also be strictly prohibited.

Scholar use of Charter School computers to access social networking sites is not prohibited, but access is limited to educational purposes only. To the extent possible, the Superintendent & CEO or designee shall block access to such sites on Charter School computers with Internet access.

The Superintendent & CEO or designee shall oversee the maintenance of the Charter School's technological resources and may establish guidelines and limits on their use.

All employees shall receive a copy of this policy and the accompanying Acceptable Use Agreement describing expectations for appropriate use of the system and shall also be provided with information about the role of staff in supervising scholar use of technological resources. All employees shall comply with this policy and the Acceptable Use Agreement, in addition to any separate policies governing employee use of technology.

Scholar use of Charter School's computers, networks, and Internet services is a privilege, not a right. Compliance with the Charter School's policies and rules concerning computer use is

mandatory. Scholars who violate these policies and rules may have their computer privileges limited and may be subject to discipline, including but not limited to suspension or expulsion per school policy.

ACCEPTABLE USE AGREEMENT

The Charter School believes that providing access to technology enhances the educational experience for scholars. However, scholar use of Charter School computers, networks, and Internet services is a privilege, not a right. To make that experience successful for everyone, scholars must abide by the following terms and conditions:

1. **Security.** Scholars shall not impair the security of Charter School technology resources. Scholars are expected to:
    a. Safeguard all personal passwords. Scholars should not share passwords with others and should change passwords frequently. Scholars are expected to notify an administrator immediately if they believe their scholar account has been compromised.
    b. Access technology only with their account or with a shared account as directed by their teacher and not to allow others to use their account or to use the accounts of others, with or without the account owner's authorization.

2. **Authorized Use.** Scholars may use Charter School technology resources when directed by a teacher, when technology has been designated for open scholar use (e.g., computers in the library), and for other educational purposes.

3. **Protection Measures.** While the Charter School is able to exercise reasonable control over content created and purchased by the Charter School, it has limited control over content accessed via the internet and no filtering system is 100% effective. Neither the Charter School nor its staff shall be responsible for the failure of any technology protection measures, violations of copyright restrictions, or user mistakes, misuse or negligence. The scholar and parent agree not to hold the Charter School or any Charter School staff responsible for the failure of any technology protection measures, violations of copyright restrictions, or user mistakes, misuse or negligence. They also agree to indemnify and hold harmless the Charter School and Charter School personnel for any damages or costs incurred.

4. **Inappropriate Use.** Charter School technology, hardware, software and bandwidth are shared and limited resources and all users have an obligation to use those resources responsibly. Scholars are provided access to the Charter School technology primarily for educational purposes. Scholars shall not use Charter School technology or equipment for personal activities or for activities that violate Charter School policy or local law. These include but are not limited to:
    a. Playing games or online gaming.
    b. Downloading software, music, movies or other content in violation of licensing requirements, copyright or other intellectual property rights.
    c. Installing software on Charter School equipment without the permission of a educational facilitator or other authorized Charter School staff person.
    d. Downloading, viewing or sharing inappropriate content, including pornographic, defamatory or otherwise offensive material.

e. Conducting any activity that is in violation of Charter School policy or local, state or federal law.
f. Engaging in any activity that is harmful to other scholar(s), including the use of technology to harass, intimidate, bully or otherwise disrupt the educational process.
g. Conducting for-profit business.
h. Using hacking tools on the network or intentionally introducing malicious code or viruses into the Charter School's network.
i. Using any software or proxy service to obscure either the scholar's IP address or the sites that the scholar visits.
j. Disabling, bypassing, or attempting to disable or bypass any system monitoring, filtering or other security measures.
k. Accessing or attempting to access material or systems on the network that the scholar is not authorized to access.

5. **No Expectation of Privacy.** Scholar acknowledges that computer equipment, Internet access networks, email accounts, and any other technology resources are owned by Charter School and provided to scholars for educational purposes. The Charter School may require staff to monitor and supervise all access to computer equipment, Internet access networks, and email accounts. To facilitate monitoring of activities, computer screens may be positioned so that they are visible to the staff member supervising the scholars. The Charter School reserves the right to access stored computer records and communications, files, and other data stored on Charter School equipment or sent over Charter School networks. Such communications, files, and data are not private and may be accessed during routine system maintenance; during inspection of Charter School equipment at the end of the school year/term or agree to use period; and review of individual files or monitoring of individual activity when there is a reasonable suspicion that the scholar is engaging in an inappropriate use.

6. **Disruptive Activity.** Scholars should not intentionally interfere with the performance of the Charter School's network or intentionally damage any Charter School technology resources.

7. **Unauthorized Networks.** Scholars may not create unauthorized wireless networks to access the Charter School's network. This includes establishing wireless access points, wireless routers and open networks on personal devices.

8. **Consequences of Inappropriate Use.** Scholars who violate this Agreement will be subject to discipline, which may include loss of access to Charter School technology resources and/or other appropriate disciplinary or legal action in accordance with the Charter School Policy and applicable laws.

9. **Technology Systems/Equipment Care.** Scholars are not permitted to have food or drink near computers/other technology and must keep equipment and assigned areas free of vandalism.

After reading the Scholar Use of Technology Policy and the Acceptable Use Agreement, please complete this form to indicate that you agree with the terms and conditions provided. The signature of both the scholar and parent/guardian are mandatory before access may be granted to

the technologies available. This document, which incorporates the Use Procedure, reflects the entire agreement and understanding of all parties.

As a user of Charter School technologies, I have read Scholar Use of Technology Policy and herby agree to comply with it and the Acceptable Use Agreement.

I understand that computer use is a privilege and not a right. I understand that if I violate this policy in any way, I will be subject to a referral and possible suspension. I understand that the parent or guardian of a minor scholar shall be liable for the replacement cost for property the Charter School loaned to the scholar that the scholar fails to return or that is willfully cut, defaced or otherwise damaged, up to an amount not to exceed ten thousand dollars ($10,000), adjusted annually for inflation. When the minor and parent are unable to pay for the damages, the Charter School will provide a program of voluntary work for the minor in lieu of the payment of monetary damages. A scholar over the age of majority shall be liable for the same. (Ed. Code 48904).

Scholar Name (please print): _____ Grade: _____

Scholar Signature: _____ Date: _____

Parent/Guardian Name (Please Print):_____

Parent/Guardian Signature: _____ Date: _____

_____For School Employees Only_____

I have read, understand and agree to abide by the Scholar Use of Technology Policy and the Acceptable Use Agreement. I understand that the Charter School's policies, procedures, rules, and regulations which apply to scholars also apply to me as an adult user of the Charter School's technology, in addition to any separate policies governing employee use of technology.

Employee Signature: _____

Employee Name (Please Print) _____

Board Policy #: 37
Adopted/Ratified: October 3, 3019
Revision Date:

SECTION 37 - SCHOLAR POLICY – TITLE IX, HARASSMENT, INTIMIDATION, DISCRIMINATION, AND BULLYING POLICY

Discrimination, sexual harassment, harassment, intimidation, and bullying are all disruptive behaviors, which interfere with scholars' ability to learn and negatively affect scholar engagement, diminish school safety, and contribute to a hostile school environment. As such, Compass Charter Schools prohibits any acts of discrimination, sexual harassment, harassment, intimidation, and bullying altogether. This policy is inclusive of instances that occur on any area of the school campus, at school-sponsored events and activities, regardless of location, through school-owned technology, and through other electronic means.

As used in this policy, discrimination, sexual harassment, harassment, intimidation, and bullying are described as the intentional conduct, including verbal, physical, written communication or cyber-bullying, including cyber sexual bullying, based on the actual or perceived characteristics of disability, pregnancy, gender, gender identity, gender expression, nationality, ancestry, race or ethnicity, immigration and citizenship status, religion, religious affiliation, sexual orientation, childbirth or related medical conditions, marital status, age, or association with a person or group with one or more of these actual or perceived characteristics or any other basis protected by federal, state, local law, ordinance or regulation. In addition, bullying encompasses any conduct described in the definitions set forth in this Policy. Hereafter, such actions are referred to as "misconduct prohibited by this Policy."

To the extent possible, CCS will make reasonable efforts to prevent scholars from being discriminated against, harassed, intimidated, and/or bullied, and will take action to investigate, respond, address and report on such behaviors in a timely manner. CCS school staff that witness acts of misconduct prohibited by this Policy will take immediate steps to intervene when safe to do so.

Moreover, CCS will not condone or tolerate misconduct prohibited by this Policy by any employee, independent contractor or other person with which CCS does business, or any other individual, scholar, or volunteer. This Policy applies to all employees, scholars, or volunteer actions and relationships, regardless of position or gender. CCS will promptly and thoroughly investigate any complaint of such misconduct prohibited by this Policy and take appropriate corrective action, if warranted.

Title IX, Harassment, Intimidation, Discrimination and Bullying Coordinator ("Coordinator"):

J.J. Lewis | Superintendent & CEO
850 Hampshire Road, Suite R
Thousand Oaks, California 91361
(818) 824-6233
jlewis@compasscharters.org

Definitions

Prohibited Unlawful Harassment

- Verbal conduct such as epithets, derogatory jokes or comments or slurs.
- Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with school because of sex, race or any other protected basis.
- Retaliation for reporting or threatening to report harassment.
- Deferential or preferential treatment based on any of the protected classes above.

Prohibited Unlawful Harassment under Title IX

Title IX (20 U.S.C. § 1681 *et. seq*; 34 C.F.R. § 106.1 *et. seq*) and California state law prohibit harassment on the basis of sex. In accordance with these existing laws, discrimination on the basis of sex in education institutions is prohibited. All persons, regardless of sex, are afforded equal rights and opportunities and freedom from unlawful discrimination in education programs or activities conducted by CCS.

CCS is committed to providing an educational environment free of sexual harassment and considers such harassment to be a major offense, which may result in disciplinary action.

Sexual harassment consists of sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when: (a) Submission to the conduct is explicitly or implicitly made a term or a condition of an individual's employment, education, academic status, or progress; (b) submission to, or rejection of, the conduct by the individual is used as the basis of employment, educational or academic decisions affecting the individual; (c) the conduct has the purpose or effect of having a negative impact upon the individual's work or academic performance, or of creating an intimidating, hostile, or offensive work or educational environment; and/or (d) submission to, or rejection of, the conduct by the individual is used as the basis for any decision affecting the individual regarding benefits and services, honors, programs, or activities available at or through the educational institution.

It is also unlawful to retaliate in any way against an individual who has articulated a good faith concern about sexual harassment against themselves or against another individual.

Sexual harassment may include, but is not limited to:

- Physical assaults of a sexual nature, such as:
    - Rape, sexual battery, molestation or attempts to commit these assaults.
    - Intentional physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another’s body, or poking another’s body.

- Unwanted sexual advances, propositions or other sexual comments, such as:
    - Sexually oriented gestures, notices, remarks, jokes, or comments about a person’s sexuality or sexual experience.
    - Preferential treatment or promises of preferential treatment to an individual for submitting to sexual conduct, including soliciting or attempting to solicit

any individual to engage in sexual activity for compensation or reward or deferential treatment for rejecting sexual conduct.
    - Subjecting or threats of subjecting a scholar to unwelcome sexual attention or conduct or intentionally making the scholar's academic performance more difficult because of the scholar's sex.

- Sexual or discriminatory displays or publications anywhere in the educational environment, such as:
    - Displaying pictures, cartoons, posters, calendars, graffiti, objections, promotional materials, reading materials, or other materials that are sexually suggestive, sexually demeaning or pornographic or bringing or possessing any such material to read, display or view in the educational environment.
    - Reading publicly or otherwise publicizing in the educational environment materials that are in any way sexually revealing, sexually suggestive, sexually demeaning or pornographic.
    - Displaying signs or other materials purporting to segregate an individual by sex in an area of the educational environment (other than restrooms or similar rooms).

The illustrations of harassment and sexual harassment above are not to be construed as an all-inclusive list of prohibited acts under this Policy.

Prohibited Bullying

Bullying is defined as any severe or pervasive physical or verbal act or conduct, including communications made in writing or by means of an electronic act. Bullying includes one or more acts committed by a scholar or group of scholars that may constitute as sexual harassment, hate violence, or creates an intimidating and/or hostile educational environment, directed toward one or more scholars that has or can be reasonably predicted to have the effect of one or more of the following:

1. Placing a reasonable pupil* or pupils in fear of harm to that pupil's or those pupils' person or property.
2. Causing a reasonable pupil to experience a substantially detrimental effect on his or her physical or mental health.
3. Causing a reasonable pupil to experience a substantial interference with his or her academic performance.
4. Causing a reasonable pupil to experience a substantial interference with his or her ability to participate in or benefit from the services, activities, or privileges provided by CCS.

* "Reasonable pupil" is defined as a pupil, including, but not limited to, an exceptional needs pupil, who exercises care, skill and judgment in conduct for a person of his or her age, or for a person of his or her age with his or her exceptional needs.

Cyberbullying is an electronic act that includes the transmission of harassing communication, direct threats, or other harmful texts, sounds, or images on the Internet, social media, or other technologies using a telephone, computer, or any wireless communication device. Cyberbullying also includes breaking into another person's electronic account and assuming that person's identity in order to damage that person's reputation.

Electronic act means the creation and/or transmission originated on or off the schoolsite, by means of an electronic device, including, but not limited to, a telephone, wireless telephone, or other wireless communication device, computer, or pager, of a communication, including, but not limited to, any of the following:

1. A message, text, sound, video, or image.
2. A post on a social network Internet Web site including, but not limited to:
    a. Posting to or creating a burn page. A "burn page" means an Internet Web site created for the purpose of having one or more of the effects as listed in the definition of "bullying," above.
    b. Creating a credible impersonation of another actual pupil for the purpose of having one or more of the effects listed in the definition of "bullying," above. "Credible impersonation" means to knowingly and without consent impersonate a pupil for the purpose of bullying the pupil and such that another pupil would reasonably believe, or has reasonably believed, that the pupil was or is the pupil who was impersonated.
    c. Creating a false profile for the purpose of having one or more of the effects listed in the definition of "bullying," above. "False profile" means a profile of a fictitious pupil or a profile using the likeness or attributes of an actual pupil other than the pupil who created the false profile.
3. An act of "Cyber sexual bullying" including, but not limited to:
    a. The dissemination of, or the solicitation or incitement to disseminate, a photograph or other visual recording by a pupil to another pupil or to school personnel by means of an electronic act that has or can be reasonably predicted to have one or more of the effects described in definition of "bullying," above. A photograph or other visual recording, as described above, shall include the depiction of a nude, semi-nude, or sexually explicit photograph or other visual recording of a minor where the minor is identifiable from the photograph, visual recording, or other electronic act.
    b. "Cyber sexual bullying" does not include a depiction, portrayal, or image that has any serious literary, artistic, educational, political, or scientific value or that involves athletic events or school-sanctioned activities.
4. Notwithstanding the definitions of "bullying" and "electronic act" above, an electronic act shall not constitute pervasive conduct solely on the basis that it has been transmitted on the Internet or is currently posted on the Internet.

Grievance Procedures

1. Reporting

All staff are expected to provide appropriate supervision to enforce standards of conduct and, if they observe or become aware of misconduct prohibited by this Policy, to intervene as soon as it is safe to do so, call for assistance, and report such incidents. The Board requires staff to follow the procedures in this policy for reporting alleged acts of misconduct prohibited by this Policy.

Any scholar who believes they have been subject to misconduct prohibited by this Policy or has witnessed such prohibited misconduct is encouraged to immediately report such misconduct to the Coordinator:

J.J. Lewis | Superintendent & CEO
850 Hampshire Road, Suite R
Thousand Oaks, California 91361
(818) 824-6233
jlewis@compasscharters.org

Complaints regarding such misconduct may also be made to the U.S. Department of Education, Office for Civil Rights.

While submission of a written report is not required, the reporting party is encouraged to submit a written report to the Coordinator. Oral reports shall also be considered official reports. Reports may be made anonymously, but formal disciplinary action cannot be based solely on an anonymous report.

Scholars are expected to report all incidents of misconduct prohibited by this Policy or other verbal, or physical abuses. Any scholar who feels she/he is a target of such behavior should immediately contact a teacher, counselor, the Superintendent/CEO, the Coordinator, a staff person or a family member so that she/he can get assistance in resolving the issue in a manner that is consistent with this Policy.

CCS acknowledges and respects every individual's right to privacy. All reports shall be investigated in a manner that protects the confidentiality of the parties and the integrity of the process. This includes keeping the identity of the reporter confidential, as appropriate, except to the extent necessary to carry out the investigation and/or to resolve the issue, as determined by the Coordinator or administrative designee on a case-by-case basis.

CCS prohibits any form of retaliation against any reporter in the reporting process, including but not limited to a reporter's filing of a complaint or the reporting of instances of misconduct prohibited by this Policy. Such participation shall not in any way affect the status, grades, or work assignments of the reporter.

All supervisors of staff will receive sexual harassment training within six (6) months of their assumption of a supervisory position and will receive further training once every two (2) years thereafter. All staff will receive sexual harassment training and/or instruction concerning sexual harassment as required by law.

2. Investigation

Upon receipt of a report of misconduct prohibited by this Policy from a scholar, staff member, parent, volunteer, visitor or affiliate of CCS, the Coordinator or administrative designee will promptly initiate an investigation. In most cases, a thorough investigation will take no more than seven (7) school days. If the Coordinator, or administrative designee determines that an investigation will take longer than seven (7) school days, he or she will inform the complainant and any other relevant parties and provide an approximate date when the investigation will be complete.

At the conclusion of the investigation, the Coordinator or administrative designee will meet with the complainant and, to the extent possible with respect to confidentiality laws, provide the complainant with information about the investigation, including any actions necessary to resolve

the incident/situation. However, in no case may the Coordinator or administrative designee reveal confidential information related to other scholars or employees, including the type and extent of discipline issued against such scholars or employees.

All records related to any investigation of complaints under this Policy are maintained in a secure location.

3. Consequences

Scholars or employees who engage in misconduct prohibited by this Policy will be subject to disciplinary action.

4. Uniform Complaint Procedures

When harassment or bullying is based upon one of the protected characteristics set forth in this Policy, a complainant may also fill out a Uniform Complaint Procedures complaint form at any time during the process.

5. Right of Appeal

Should the reporting individual find the Coordinator's resolution unsatisfactory, he/she may follow the Dispute Resolution Process found in UCP.

TITLE IX, HARASSMENT, INTIMIDATION, DISCRIMINATION & BULLYING COMPLAINT FORM

Your Name: _____ Date: _____

Date of Alleged Incident(s): _____

Name of Person(s) you have a complaint against: _____

List any witnesses that were present: _____

Where did the incident(s) occur? _____

Please describe the events or conduct that are the basis of your complaint by providing as much factual detail as possible (e.g.) specific statements; what, if any, physical contact was involved; any verbal statements; what did you do to avoid the situation, etc.) (Attach additional pages, if needed):

_____

_____

_____

_____

I hereby authorize CCS to disclose the information I have provided as it finds necessary in pursuing its investigation. I hereby certify that the information I have provided in this complaint is true and correct and complete to the best of my knowledge and belief. I further understand providing false information in this regard could result in disciplinary action up to and including termination.

_____ Date: _____

Signature of Complainant

_____

Print Name

<u>To be completed by the Charter School</u>:

Received by: _____ Date: _____

Follow up Meeting with Complainant held on: _____

Board Policy #: 38
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 38 – SCHOLAR POLICY –TOBACCO-FREE SCHOOL POLICY

Ample research has demonstrated the health hazards associated with the use of tobacco products, including smoking and the breathing of secondhand smoke. Compass Charter Schools provides instructional programs designed to discourage scholars from using tobacco products. The Board recognizes that smoking and other uses of tobacco and nicotine products constitute a serious public health hazard and are inconsistent with the goals of all CCS to provide a healthy environment for scholars and staff.

CCS employees are expected to serve as models for good health practices that are consistent with these instructional programs.

In the best interest of scholars, employees, and the general public, the CCS's Board therefore prohibits the use of tobacco products at all times on CCS property and in CCS vehicles. This prohibition applies to all employees, scholars, visitors, and other persons at the Charter School or at a Charter School-sponsored activity or athletic event. It applies to any meeting on any property owned, leased, or rented by or from CCS. It also applies to any scholar while under the supervision and control of Charter School employees.

The products prohibited include any product containing tobacco or nicotine, including, but not limited to, cigarettes, cigars, little cigars, chewing tobacco, pipe tobacco, snuff, chew, clove cigarettes, betel, electronic cigarettes, electronic hookahs, and other vapor-emitting devices, with or without nicotine content, that mimic the use of tobacco products.

This Policy does not prohibit the use or possession of prescription products, nicotine patches, nicotine gum or a nicotine replacement product or cessation aids that have been approved by the United States Food and Drug Administration.

Smoking or use of any tobacco-related product or disposal of any tobacco-related waste is prohibited within 25 feet of any playground, except on a public sidewalk located within 25 feet of the playground. Smoking or use of any tobacco-related product is also prohibited within 250 feet of the youth sports event in the same park or facility where a youth sports event is taking place. In addition, any form of intimidation, threat, or retaliation against a person for attempting to enforce this Policy is prohibited.

The Superintendent & CEO or designee shall inform scholars, parents/guardians, employees, and the public about this Policy. All individuals on CCS's premises share in the responsibility of adhering to this Policy. Additionally, CCS will post signs stating "Tobacco use is prohibited" prominently at all entrances to Charter School property.

The Superintendent & CEO or designee shall maintain a list of clinics and community resources that may assist employees who wish to stop using tobacco products.

The Superintendent & CEO or designee may disseminate this information through annual written

notifications, district and school web sites, scholar handbooks, and/or other appropriate methods of communication.

Appropriate Charter School officials will monitor CCS property and facilities for compliance with this Board Policy. The Superintendent & CEO shall develop and maintain procedures to resolve grievances that may result from alleged non-compliance.

Any CCS employee or scholar who violates this Policy shall be asked to refrain from smoking and shall be subject to disciplinary action as appropriate.

Any other person who violates this Tobacco-Free Schools Policy shall be informed of this Policy and asked to refrain from smoking. If the person fails to comply with this request, the Superintendent & CEO or designee may:

1. Direct the person to leave school property.

2. Request local law enforcement assistance in removing the person from the Charter School premises.

3. If the person repeatedly violates the Tobacco-Free Schools Policy, prohibit him/her from entering Charter School property for a specified period of time.

The Superintendent & CEO or designee shall not be required to physically eject a non-employee or non-scholar who is smoking or to request that the non-employee or non-scholar refrain from smoking under circumstances involving a risk of physical harm to the Charter School or any employee.

Board Policy #: 39
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 39 – SCHOLAR POLICY – UNIFORM COMPLAINT POLICY AND PROCEDURES

Scope

Compass Charter Schools' policy is to comply with applicable federal and state laws and regulations. The Charter School is the local agency primarily responsible for compliance with federal and state laws and regulations governing educational programs. Pursuant to this policy, persons responsible for conducting investigations shall be knowledgeable about the laws and programs, which they are assigned to investigate. This complaint procedure is adopted to provide a uniform system of complaint processing for the following types of complaints:

(1) Complaints of unlawful discrimination, harassment, intimidation or bullying against any protected group, including actual or perceived discrimination, on the basis of the actual or perceived characteristics of age, ancestry, color, mental disability, physical disability, ethnic group identification, gender expression, gender identity, gender, genetic information, immigration status/citizenship, marital status, medical condition, nationality, national origin, race or ethnicity, religion, sex, or sexual orientation, or on the basis of a person's association with a person or group with one or more of these actual or perceived characteristics in any Charter School program or activity.

(2) Complaints of violations of state or federal law and regulations governing the following programs including but not limited to: Education of Pupils in Foster Care, Pupils who are Homeless, former Juvenile Court Pupils, and Pupils from Military Families, Local Control and Accountability Plans (LCAP), Migrant Education Programs, Every Student Succeeds Act / No Child Left Behind Act (2001), Programs (Titles I-VII), including improving academic achievement, compensatory education, limited English proficiency, and migrant education, Special Education Programs, State Preschool, Bilingual Education Comprehensive School Safety Plans,

(3) A complaint may also be filed alleging that a pupil enrolled in a public school was required to pay a pupil fee for participation in an educational activity as those terms are defined below.

    a. "Educational activity" means an activity offered by a school, school district, charter school or county office of education that constitutes an integral fundamental part of elementary and secondary education, including, but not limited to, curricular and extracurricular activities.

    b. "Pupil fee" means a fee, deposit or other charge imposed on pupils, or a pupil's parents or guardians, in violation of Section 49011 of the Education Code and Section 5 of Article IX of the California Constitution, which require educational activities to be provided free of charge to all pupils without regard to their families' ability or willingness to pay fees or request special waivers, as provided

for in *Hartzell v. Connell* (1984) 35 Cal.3d 899. A pupil fee includes, but is not limited to, all of the following:

i. A fee charged to a pupil as a condition for registering for school or classes, or as a condition for participation in a class or an extracurricular activity, regardless of whether the class or activity is elective or compulsory or is for credit.

ii. A security deposit, or other payment, that a pupil is required to make to obtain a lock, locker, book, class apparatus, musical instrument, uniform or other materials or equipment.

iii. A purchase that a pupil is required to make to obtain materials, supplies, equipment or uniforms associated with an educational activity.

c. A pupil fees complaint may be filed anonymously if the complaint provides evidence or information leading to evidence to support an allegation of noncompliance with laws relating to pupil fees.

d. If the Charter School finds merit in a pupil fees complaint the Charter School shall provide a remedy to all affected pupils, parents, and guardians that, where applicable, includes reasonable efforts by the Charter School to ensure full reimbursement to all affected pupils, parents, and guardians, subject to procedures established through regulations adopted by the state board.

e. Nothing in this section shall be interpreted to prohibit solicitation of voluntary donations of funds or property, voluntary participation in fundraising activities, or school districts, school, and other entities from providing pupils prizes or other recognition for voluntarily participating in fundraising activities.

(4) Complaints of noncompliance with the requirements governing the Local Control Funding Formula, Local Control and Accountability Plans, or Sections 47606.5 and 47607.3 of the Education Code, as applicable.

(5) Complaints of noncompliance with the requirements of Education Code Section 222 regarding the rights of lactating pupils on a school campus.

(6) Complaints of noncompliance with the requirements of Education Code Section 48645.7 regarding the rights of juvenile court school pupils when they become entitled to a diploma.

(7) Complaints of noncompliance with the Charter School's School Safety Plan.

The Charter School acknowledges and respects every individual's rights to privacy. Unlawful discrimination, harassment, intimidation or bullying complaints shall be investigated in a manner that protects (to the greatest extent reasonably possible) the confidentiality of the parties and the integrity of the process. The Charter School cannot guarantee anonymity of the complainant. This includes keeping the identity of the complainant confidential. However, the Charter School will attempt to do so as appropriate. The Charter School may find it necessary to disclose

information regarding the complaint/complainant to the extent necessary to carry out the investigation or proceedings, as determined by the Superintendent & CEO or designee on a case-by-case basis.

The Charter School prohibits any form of retaliation against any complainant in the complaint process, including but not limited to a complainant's filing of a complaint or the reporting of instances of unlawful discrimination, harassment, intimidation or bullying. Such participation shall not in any way affect the status, grades or work assignments of the complainant.

Compliance Officer

The Board of Directors designates the following compliance officer(s) to receive and investigate complaints and to ensure the Charter School's compliance with law:

J.J. Lewis | Superintendent & CEO
850 Hampshire Road, Suite R
Thousand Oaks, California 91361
(818) 824-6233
jlewis@compasscharters.org

The Superintendent & CEO or designee shall ensure that employees designated to investigate complaints are knowledgeable about the laws and programs for which they are responsible. Designated employees may have access to legal counsel as determined by the Superintendent & CEO or designee.

Should a complaint be filed against the Superintendent & CEO, the compliance officer for that case shall be the Chair of the Charter School Board of Directors.

Notifications

The Charter School shall annually provide written notification of the Charter School's uniform complaint procedures to employees, scholars, parents and/or guardians, advisory committees, private school officials, and other interested parties (e.g., Adult Education).

The annual notice shall be in English. Pursuant to Education Code Section 48985, if fifteen (15) percent or more of the pupils enrolled in the Charter School speak a single primary language other than English, this annual notice will also be provided to the parent or guardian of any such pupils in their primary language.

The Superintendent & CEO or designee shall make available copies of the Charter School's uniform complaint procedures free of charge.

The annual notice shall include the following:

(a) A statement that the Charter School is primarily responsible for compliance with federal and state laws and regulations.

(b) A statement that a pupil enrolled in a public school shall not be required to pay a pupil fee for participation in an educational activity.

(c) A statement identifying the responsible staff member, position, or unit designated to receive complaints.

(d) A statement that the complainant has a right to appeal the Charter School's decision to the California Department of Education ("CDE") by filing a written appeal within 15 days of receiving the Charter School's decision.

(e) A statement advising the complainant of any civil law remedies that may be available under state or federal discrimination, harassment, intimidation or bullying laws, if applicable, and of the appeal pursuant to Education Code Section 262.3.

(f) A statement that copies of the local educational agency complaint procedures shall be available free of charge.

Procedures

The following procedures shall be used to address all complaints which allege that the Charter School has violated federal or state laws or regulations governing educational programs. The Compliance Officer shall maintain a record of each complaint and subsequent related actions.

All parties involved in allegations shall be notified when a complaint is filed, when a complaint meeting or hearing is scheduled, and when a decision or ruling is made.

STEP 1: FILING OF COMPLAINT

Any individual, public agency, or organization may file a written complaint of alleged noncompliance by the Charter School.

A complaint alleging unlawful discrimination, harassment, intimidation or bullying shall be initiated no later than six (6) months from the date when the alleged unlawful discrimination, harassment, intimidation or bullying occurred, or six (6) months from the date when the complainant first obtained knowledge of the facts of the alleged unlawful discrimination, harassment, intimidation or bullying. A complaint may be filed by a person who alleges that he/she personally suffered unlawful discrimination, harassment, intimidation or bullying or by a person who believes that an individual or any specific class of individuals has been subjected to unlawful discrimination, harassment, intimidation or bullying.

Pupil fee complaints shall be filed not later than one (1) year from the date the alleged violation occurred.

The complaint shall be presented to the compliance officer who shall maintain a log of complaints received, providing each with a code number and date stamp.

If a complainant is unable to put a complaint in writing due to conditions such as a disability or illiteracy, the Charter School staff shall assist him/her in the filing of the complaint.

STEP 2: MEDIATION

Within three (3) days of receiving the complaint, the Compliance Officer may informally discuss with the complainant the possibility of using mediation. If the

complainant agrees to mediation, the Compliance Officer shall make arrangements for this process.

Before initiating the mediation of an unlawful discrimination, harassment, intimidation or bullying complaint, the Compliance Officer shall ensure that all parties agree to make the mediator a party to related confidential information.

If the mediation process does not resolve the problem within the parameters of law, the Compliance Officer shall proceed with his/her investigation of the complaint.

The use of mediation shall not extend the Charter School's timelines for investigating and resolving the complaint unless the complainant agrees in writing to such an extension of time.

STEP 3: INVESTIGATION OF COMPLAINT

The Compliance Officer is encouraged to hold an investigative meeting within five (5) days of receiving the complaint or an unsuccessful attempt to mediate the complaint. This meeting shall provide an opportunity for the complainant and/or his/her representative to repeat the complaint orally.

The complainant and/or his/her representative shall have an opportunity to present the complaint and evidence or information leading to evidence to support the allegations in the complaint.

A complainant's refusal to provide the Charter School's investigator with documents or other evidence related to the allegations in the complaint, or his/her failure or refusal to cooperate in the investigation or his/her engagement in any other obstruction of the investigation, may result in the dismissal of the complaint because of a lack of evidence to support the allegation.

The Charter School's refusal to provide the investigator with access to records and/or other information related to the allegation in the complaint, or its failure or refusal to cooperate in the investigation or its engagement in any other obstruction of the investigation, may result in a finding, based on evidence collected, that a violation has occurred and may result in the imposition of a remedy in favor of the complainant.

STEP 4: RESPONSE

Unless extended by written agreement with the complainant, the Compliance Officer shall prepare and send to the complainant a final written decision of the Charter School's investigation and disposition, as described in Step 5 below, within sixty (60) days of the Charter School's receipt of the complaint.

STEP 5: FINAL WRITTEN DECISION

The Charter School's decision shall be in writing and sent to the complainant. The Charter School's decision shall be written in English and in the language of the complainant whenever feasible or as required by law.

The decision shall include:

1. The findings of fact based on evidence gathered.

2. The conclusion(s) of law.

3. Disposition of the complaint.

4. Rationale for such disposition.

5. Corrective actions, if any are warranted.

6. Notice of the complainant's right to appeal the Charter School's decision within fifteen (15) days to the CDE and procedures to be followed for initiating such an appeal.

7. For unlawful discrimination, harassment, intimidation or bullying complaints arising under state law, notice that the complainant must wait until sixty (60) days have elapsed from the filing of an appeal with the CDE before pursuing civil law remedies.

8. For unlawful discrimination, harassment, intimidation or bullying complaints arising under federal law such complaint may be made at any time to the U.S. Department of Education, Office for Civil Rights.

   If an employee is disciplined as a result of the complaint, the decision shall simply state that effective action was taken and that the employee was informed of the Charter School's expectations. The report shall not give any further information as to the nature of the disciplinary action.

Appeals to the California Department of Education

If dissatisfied with the Charter School's decision, the complainant may appeal in writing to the CDE within fifteen (15) days of receiving the Charter School's decision. When appealing to the CDE, the complainant must specify the basis for the appeal of the decision and whether the facts are incorrect and/or the law has been misapplied. The appeal shall be accompanied by a copy of the locally filed complaint and a copy of the Charter School's decision.

Upon notification by the CDE that the complainant has appealed the Charter School's decision, the Superintendent & CEO or designee shall forward the following documents to the CDE:

1. A copy of the original complaint.

2. A copy of the decision.

3. A summary of the nature and extent of the investigation conducted by the Charter School, if not covered by the decision.

4. A copy of the investigation file, including but not limited to all notes, interviews, and documents submitted by all parties and gathered by the investigator.

5. A report of any action taken to resolve the complaint.

6. A copy of the Charter School's complaint procedures.

7. Other relevant information requested by the CDE.

The CDE may directly intervene in the complaint without waiting for action by the Charter School when one of the conditions listed in Title 5, California Code of Regulations, Section 4650 exists, including cases in which the Charter School has not taken action within sixty (60) days of the date the complaint was filed with the Charter School.

Civil Law Remedies

A complainant may pursue available civil law remedies outside of the Charter School's complaint procedures. Complainants may seek assistance from mediation centers or public/private interest attorneys. Civil law remedies that may be imposed by a court include, but are not limited to, injunctions and restraining orders. For unlawful discrimination, harassment, intimidation or bullying complaints arising under state law, however, a complainant must wait until sixty (60) days have elapsed from the filing of an appeal with the CDE before pursuing civil law remedies. The moratorium does not apply to injunctive relief and is applicable only if the Charter School has appropriately, and in a timely manner, apprised the complainant of his/her right to file a complaint in accordance with Title 5, California Code of Regulations, Section 4622.

COMPASS CHARTER SCHOOLS

UNIFORM COMPLAINT PROCEDURE FORM

Last Name: _____ First Name/MI: _____

Scholar Name (if applicable): _____ Grade: _____ Date of Birth: _____

Street Address/Apt. #: _____

City: _____ State: _____ Zip Code: _____

Home Phone: _____ Cell Phone: _____ Work Phone: _____

School/Office of Alleged Violation: _____

For allegation(s) of noncompliance, please check the program or activity referred to in your complaint, if applicable:

- ☐ Academic Achievement
- ☐ Bilingual Education
- ☐ Compensatory Education
- ☐ English Proficiency
- ☐ Every Student Succeeds Act / No Child Left Behind Programs
- ☐ Foster/Homeless Youth Education
- ☐ Juvenile Court School Pupils
- ☐ Local Control Funding Formula/ Local Control and Accountability Plan (LCAP)
- ☐ Migrant Education
- ☐ Migratory Pupils
- ☐ School Safety Plan
- ☐ Special Education
- ☐ State Preschool Health/Safety
- ☐ Pupils from Military Families

For allegation(s) of unlawful discrimination, harassment, intimidation or bullying, please check the basis (actual or perceived) of the unlawful discrimination, harassment, intimidation or bullying described in your complaint, if applicable:

- ☐ Age
- ☐ Ancestry
- ☐ Color
- ☐ Disability (Mental or Physical)
- ☐ Ethnic Group Identification
- ☐ Gender / Gender Expression / Gender Identity
- ☐ Genetic Information
- ☐ Immigration Status/Citizenship
- ☐ Marital Status
- ☐ Medical Condition
- ☐ Nationality / National Origin
- ☐ Race or Ethnicity
- ☐ Religion
- ☐ Sex
- ☐ Sexual Orientation
- ☐ Based on association with a person or group with one or more of these actual or perceived characteristics

1. Please give facts about the complaint. Provide details such as the names of those involved, dates, whether witnesses were present, etc., that may be helpful to the complaint investigator.

_____
_____
_____
_____
_____
_____
_____

2. Have you discussed your complaint or brought your complaint to any Charter School personnel? If you have, to whom did you take the complaint, and what was the result?

_____
_____
_____
_____

3. Please provide copies of any written documents that may be relevant or supportive of your complaint.

   I have attached supporting documents. ☐ Yes ☐ No

Signature: _____
Date: _____

Mail complaint and any relevant documents to the Compliance Officer:

J.J. Lewis | Superintendent & CEO
850 Hampshire Road, Suite P
Thousand Oaks, California 91361
(818) 824-6233
jlewis@compasscharters.org

Board Policy #: 40
Adopted/Ratified: October 3, 2019
Revision Date:

SECTION 40 – SCHOLAR POLICY – GENERAL COMPLAINT

Compass Charter Schools ("CCS" or the "Charter School") has adopted this General Complaint Policy to address concerns about CCS generally and/or regarding specific CCS employees. For complaints regarding harassment, discrimination, unlawful tuition, or other specific perceived violations of state or federal laws, please refer to the Charter School's Title IX, Harassment, Intimidation, Discrimination, and Bullying Policy Anti-Discrimination and/or the Charter School's Uniform Complaint Procedures. For all other complaints, this Policy, the General Complaint Form, and accompanying procedures will be appropriate. For any questions regarding the application of this Policy or CCS's other policies, please contact the Superintendent & CEO, J.J. Lewis, at 818-824-6233 or jlewis@compasscharters.org.

INTERNAL COMPLAINTS
(Complaints by Employees against Employees)

This section of the Policy is for use when a CCS employee raises a complaint or concern about a co-worker.

If reasonably possible, internal complaints should be resolved at the lowest possible level, including attempts to discuss/resolve concerns with the immediate supervisor. However, in the event an informal resolution may not be achieved or is not appropriate, the following steps will be followed:

1. The complainant will bring the matter to the attention of the Superintendent & CEO as soon as possible after attempts to resolve the complaint with the immediate supervisor have failed or if not appropriate. The complainant will reduce his or her complaint to writing by completing the General Complaint Form, below, indicating all known and relevant facts. The Superintendent & CEO (or designee) will then investigate the facts and provide a solution or explanation; or

2. If the complaint is about the Superintendent & CEO, the complainant may file his or her complaint using the General Complaint Form, below, to the Chair of the Board of Directors ("Board"), who will then confer with the Board and may conduct a fact-finding or authorize a third-party investigator on behalf of the Board. The Chair or investigator will report his or her findings to the Board for review and action, if necessary.

This Policy cannot guarantee that every problem will be resolved to the employee's satisfaction. However, CCS values each employee's ability to express concerns and the need for resolution without fear of adverse consequence to employment.

POLICY FOR COMPLAINTS GENERALLY
(General Complaints by Third Parties against CCS or CCS Employees)

This section of the Policy is for use when either a complaint does not fall under other complaint procedures or a third party (non-employee) raises a complaint or concern about CCS generally or a CCS employee.

If reasonably possible, internal complaints should be resolved at the lowest possible level, including attempts to discuss/resolve concerns with the CCS employee directly. However, in the event an informal resolution may not be achieved or is not appropriate, the following steps will be followed:

1. Complainants may file a written complaint using the General Complaint Form, below, with the office of the Superintendent & CEO as soon as possible after the events that give rise to the complainant's concerns. The written complaint should set forth in detail the factual basis for the complaint;

2. The Superintendent & CEO (or designee) shall use his or her best efforts to ascertain the facts relating to the complaint. Where applicable, the Superintendent & CEO (or designee) shall talk with the parties identified in the complaint or persons with knowledge of the particulars of the complaint to ascertain said facts; and

3. In the event that the Superintendent & CEO (or designee) finds that a complaint is valid, the Superintendent & CEO (or designee) may take appropriate action to resolve the problem. Where the complaint is against an employee of CCS, the Superintendent & CEO (or designee) may take disciplinary action against the employee. As appropriate, the Superintendent & CEO (or designee) may also simply counsel/reprimand employees as to their conduct without initiating formal disciplinary measures. The Superintendent & CEO's (or designee's) decision relating to the complaint shall be final.

4. If the complaint is about the Superintendent & CEO, the complainant may file his or her complaint in using the General Complaint Form, below, to the Chair of the Board, who will then confer with the Board and may conduct a fact-finding or authorize a third-party investigator on behalf of the Board. The Chair or investigator will report his or her findings to the Board for review and further action, if deemed necessary by the Board.

GENERAL REQUIREMENTS

Confidentiality: All complainants will be notified that information obtained from the complainants and thereafter gathered will be maintained in a manner as confidential as possible, but in some circumstances absolute confidentiality cannot be assured.

Non-Retaliation: All complainants will be advised that they will be protected against retaliation as a result of the filing of any complaints or participation in any complaint process.

Resolution: The Board, Superintendent & CEO, or designee will investigate complaints appropriately under the circumstances and pursuant to the applicable procedures, and if necessary, take appropriate remedial measures to ensure effective resolution of any complaint.

COMPASS
CHARTER SCHOOLS

GENERAL COMPLAINT FORM

Your Name: _____ Date: _____

Date of Alleged Incident(s): _____

Name of Person(s) you have a complaint against: _____

_____

List any witnesses that were present: _____

_____

Where did the incident(s) occur?

_____

Please describe the circumstances, events, or conduct that are the basis of your complaint by providing as much factual detail as possible (i.e. specific statements; what, if any, physical contact was involved; any verbal statements; what did you do to avoid the situation, etc.) (Attach additional pages, if needed):

_____

_____

_____

_____

_____

I hereby authorize CCS to disclose the information I have provided as it finds necessary in pursuing its investigation. I hereby certify that the information I have provided in this complaint is true and correct and complete to the best of my knowledge and belief. I further understand providing false information in this regard could result in disciplinary action up to and including termination.

_____ _____

Signature of Complainant Date:

_____

Print Name

To be completed by CCS:

Received by: _____ Date: _____

Board Policy #: 41
Adopted/Ratified: September 27, 2020
Revision Date:

SECTION 41 – SCHOLAR POLICY – DIGITAL SIGNATURE POLICY

Compass Charter Schools (the "Charter School") has adopted this Digital Signature Policy to increase productivity and ensure convenient, timely and appropriate access to Charter School information by using digital signature technology to collect and preserve signatures on documents quickly, securely, and efficiently.

The legality and use of digital signatures are governed by 15 U.S.C. Sections 7001, *et seq.* Government Code Section 16.5; and Civil Code Sections 1633.1, *et seq.*

This Policy establishes when digital signature technology may replace a hand-written signature, with the goal of encouraging the use of paperless, electronic documents whenever appropriate and allowed by law. This Policy applies to all signatures used in processing various Charter School documents and assumes the signee has been given the authority to sign as determined by the Board of Directors.

While the use of digital signatures is suggested and encouraged, this Policy does not require the use of digital signatures, nor can the Charter School mandate that any third party signing a document use digital signatures.

This Policy applies to documents requiring a signature of any person where the signature is intended to show authorship, approval, authorization, or certification, as allowed by law. Affixing a digital signature to a document in a manner consistent with this Policy shall satisfy the Charter School's requirements for signing a document. As used in this Policy, the term "signature" includes using initials on a document instead of a signature.

REQUIREMENTS OF A DIGITAL SIGNATURE

A digital signature means an electronic identifier, created by computer, intended by the party using it to have the same force and effect as the use of a manual signature. For purposes of this section, a digital signature is a type of "electronic signature" as defined in Civil Code Section 1633.2(h).

The use of a digital signature is permitted and shall have the same force and effect as the use of a "wet" or manual signature if all the following criteria are met:

1. The digital signature is unique to the person using it.
2. The digital signature is capable of verification.
3. The digital signature is under the sole control of the person using it.
4. The digital signature is linked to the data in such a manner that if the data is changed after the digital signature is affixed, the electronic signature is invalidated.

COMMON TYPES OF DOCUMENTS

This Policy is intended permit the use of digital signatures to the greatest extent permitted by law. Examples of common types of documents for which digital signatures are permitted include purchase orders, contracts not requiring Board approval, and certain special education notice requirements. The Charter School shall work with legal counsel to determine where applicable laws permit a digital signature to be used.

DOCUMENTS INVOLVING OTHER PARTIES

In the case of contracts or transactions which must be signed by outside parties, each party to the agreement must agree in advance to the use of a digital signature. No party to a contract or other document may be forced to accept a digital signature; they must be permitted to decide either way. Such consent may be withdrawn by the other party at any time such that future documents must be signed in hardcopy format.

When a document is digitally signed by all parties, the Charter School shall provide a copy of the digitally-signed document to the other parties in an electronic format that is capable of being retained and printed by the other parties.

STORAGE AND ARCHIVING OF DIGITALLY-SIGNED DOCUMENTS

If a document exists only electronically, steps shall be taken by the Charter School to ensure that a fixed version of the final document is stored consistent with document retention policies and any applicable law.

DIGITAL SIGNATURE SOLUTION PROVIDERS

The Charter School shall work with legal counsel to determine acceptable technologies and digital signature providers consistent with current state legal requirements and industry best practices to ensure the security and integrity of the data and the signature. An approved list of Digital Signature Certification Authorities certified by the California Secretary of State for use by public entities is maintained at the following web site. https://www.sos.ca.gov/administration/regulations/current-regulations/technology/digital-signatures/approved-certification-authorities[4].

[4] Effective 4/22/2020, the requirement for certification of digital signatures is not in effect due to emergency regulations. These emergency regulations remain in effect through 10/20/2020, or until that date is extended or the emergency regulations are made permanent by regulatory action. Therefore, at the time of the drafting of this Policy, this list is not active.