

## **INTERNAL MONITORING REPORT**

**Submitted May 8, 2013**

**By: Craig Heimbichner, Superintendent and Chief Executive Officer**

### **POLICY# 2.1 Treatment of Clientele**

#### **Policy Language:**

**The CEO shall not cause or allow conditions, procedures, or decisions that are unsafe, untimely, undignified, or unnecessarily intrusive with Horizon clientele.**

**Further, without limiting the scope of the foregoing by this enumeration, the CEO shall not:**

- 1. Elicit information for which there is no clear necessity.**

#### **Reasonable Interpretation and Justification:**

**In order to enroll students and provide optimum educational opportunities, Horizon Charter Schools need specific student information. The educational and personal data collected determines grade level placement, impacts curricular decisions, and provides information required to fulfill both federal and state reporting requirements.**

**As outlined in the Internal Monitoring Report for Policy 2.0, student information is protected by a variety of laws and regulations. These include, but are not limited to, the Family Educational Rights and Privacy Act (FERPA) and the Individuals with Disabilities Education Act (IDEA). Both laws clearly protect the privacy rights of students when collecting information. Parents/guardians and students who reach the age of 18 have specific rights to review and inspect records. In addition, parents/guardians have the right to “decline to state” when it comes to reporting certain demographic data. The collection of unnecessary data may violate student rights to protection under adopted statutes. It is the responsibility of the CEO to ensure these rights are constantly and consistently protected.**

#### **Data Directly Addressing the Interpretation:**

**For the purpose of this report, forms and data collected during enrollment were reviewed by two contracted external firms: Ryland and Associates, and Crowe Horwath. The application checklist for all students requires a completed application, student birth certificate, copy of immunization records, and high school transcript (grades 9-12 only). Students in kindergarten or first grade also need a health exam or health waiver. Special education students must provide copies of the most recent IEP, 504 Plan, and/or assessment results.**

**Review of the Student Enrollment Application did not reveal any requests for unnecessary or duplicate information.**

- 2. Use methods of collecting, reviewing, transmitting, or storing client information that fail to protect against improper access to the material elicited.**

**Reasonable Interpretation and Justification:**

**This policy section requires the means used to acquire, utilize and store student information must protect any and all data from improper handling and/or misuse. This data includes student and parent/guardian information such as address, phone number, parental work information, etc. Personal student health information is also required by the state of California as part of enrollment. Student academic information is also retrieved from previous schools and utilized to make academic decisions. Information pertaining to special education students may include sensitive information about specific physical or cognitive disabilities and is highly confidential.**

**Information regarding students must be shared with appropriate staff. Since Horizon staff reside over a six county area, this sharing is often done electronically. Appropriate security measures must be in place.**

**Data Directly Addressing the Interpretation:**

**Initial student information is collected from parents/guardians upon enrollment. This written information is then entered into the student information system database. Authorized staff have access to student information via the computer. Information regarding special education students is filed separately in the Special Education Department and only authorized staff may access these records.**

**Student Records staff have been trained in the appropriate process for responding to requests for student records. Further training will be delivered as required by the firm Crowe Horwath to keep staff current. Official signed requests from schools and/or parental authorization are required for transmission of records to another educational setting.**

**Student cum files are stored in the Student Records Department and secured when staff are not present in the office. Student files must be kept for certain periods of time as per statute. These files are boxed and kept in locked storage areas for security purposes.**

3. **Fail to operate facilities with appropriate accessibility, privacy, and safety.**

**Reasonable Interpretation and Justification:**

**HCS must provide equal physical access to all facilities as well as protect the privacy and safety of all students. Facilities should be clean and well maintained at all times. Applicable safety and security measures designed to prevent injury should be in place. Behavior expectations should be clear and enforced for the protection of both students and staff. Clear emergency procedures should be up-to-date and clearly communicated. This policy expects all of the above will be in place in order to provide appropriate learning environments for students of all abilities and educational needs.**

**Data Directly Addressing the Interpretation:**

**Student safety is of the utmost importance at Horizon. All sites have adopted behavior policies and guidelines that are communicated to staff and parents. Students are subject to discipline as per Education Code 48900 and Education Code 48915 as outlined in the Horizon and Partners charters. Student infractions result in suspension or other means of corrective action to address inappropriate behavior. Behavioral expectations for students participating in school wide testing have been developed and communicated to staff and parents. Enforcement of these standards presents a challenge due to the fact that many staff and students only interact during the testing dates. The Student Handbook clearly delineates behavior expectations.**

**The Superintendent and the Deputy Superintendent have emphasized relevant California Education Codes and other related laws in administration meetings. The Deputy Superintendent in particular has provided support to keep administrators up to date in the latest laws, their application, and procedures for implementation, enforcement and notification.**

**Horizon Charter Schools employ a Safety Coordinator who continually monitors sites and offices for compliance with industry safety standards. Issues of non-compliance are immediately addressed and all staff are required to complete annual online safety training. The effort to ensure that Horizon is current with all safety laws and standards has brought the topic of safety to the Professional Development Team led by our Deputy Superintendent in a collaborative manner.**

4. **Fail to establish with clientele a clear understanding of what may be expected and what may not be expected from the service offered.**

**Reasonable Interpretation and Justification:**

**Parents and students should clearly understand the services and programs at Horizon Charter Schools. While the schools must fulfill the legal requirements of all California public schools, HCS offer a wide variety of**

educational options for students. One of the strengths of HCS is the wide array of program choices. However, the numerous opportunities available may also contribute to misunderstandings regarding student and parent responsibility in the personalized education model. This policy expects parents and students will be provided clear explanations of program options at HCS. Parents and students must also be made aware that changes in charter school law, federal law and state mandates may also affect operations at the school.

**Data Directly Addressing the Interpretation:**

Horizon Charter Schools require new students and their parents/guardians to participate in the admissions process. Parents are required to initial the requirements outlined in the charter. Additional expectations such as participation in state mandated testing are also explained during the enrollment process.

Programmatic options are outlined on the HCS website and further explained in face-to-face meetings with credentialed teachers during the enrollment appointment. Parents are given the opportunity to ask questions and receive information about the many program options at HCS and are then advised as to placement based upon each individual student's educational plan. The Supervising Teacher continually works with students and their families providing support, information, and resources based upon student academic progress.

5. Fail to inform clientele of this policy or to provide a way to be heard for persons who believe they have not been accorded a reasonable interpretation of their protections under this policy.

**Reasonable Interpretation and Justification:**

This policy requires clientele be informed of their rights and responsibilities covered under this section. In addition, clear communication channels for clientele who have complaints or concerns regarding school operations need to be delineated and communicated. The process for effective handling of complaints must include the method for initiating a complaint, the stages of the complaint, applicable deadlines, and privacy rights of those involved in the complaint process. All complaints should be resolved in a timely, courteous and private manner. This policy expects that the Superintendent/CEO will preserve and uphold the values of honesty, mutual respect, and civil discourse. Parents and students involved in the complaint process shall not experience retaliation.

**Data Directly Addressing the Interpretation:**

HCS communicate with parents and students via the website, email and the assigned Supervising Teacher. Increased use of social media and other modes

**of information have been implemented with a redesigned website, making access to information easier. An adopted Uniform Complaint Procedure is posted on the website. It is the intent that all issues be resolved as swiftly as possible.**

**Due to the complaint of certain former parents following the closure of the Accelerated Learning Academy, Horizon engaged the services of an independent external reviewer (Ryland and Associates). This reviewer found that Horizon's current administration is taking steps to increase communication and transparency.**