**August 29, 2019**

**Re: Summer 2019 Policy Update**

Dear Board:

Enclosed are the policies and appendices that we have updated pursuant to changes in state education laws. Please consult the summaries of these changes that follow and the Table of Policy Changes attached to this letter, which identifies the policies requiring Board adoption.

**Federal Grants**: Pursuant to the federal Uniform Grant Guidance, which governs the School’s use of federal grant funds, the micro-purchase threshold has increased from $3,500 to $10,000 and the simplified acquisition threshold has increased from $150,000 to $25,000. As such, the Appendix regarding Methods of Procurement Using Federal Grant Funds, located at or around appendix 148.8, has been updated. Similarly, the Federal Grants Procurement, Monitoring, and Administration policy, located at or around policy 148.8 in your policy notebook, as well as the Cost Principals and Financial Management for Use of Federal Funds policy, located at or around policy 148.10, have also been updated to reflect guidance from the Auditor of State.

**Cyber Threats:** In recent audits, the Auditor of State requested that schools adopt policies and procedures to address potential cyber threats. Accordingly, our office created a new cyber threat policy and cyber threat incident response plan, which can be inserted into your policy notebook as policy 204.16 and Appendix 204.16-A, to address potential threats to the School’s data privacy.

**Student Transportation**: Ohio Administrative Code provisions relating to student transportation have been updated. Please contact our office if your School has adopted a Transportation of Pupils Policy and/or an Emergency Evacuation Policy (for evacuation of school owned vehicles), located at or around policy 236 and 236.1, respectively. A customized policy will be needed to address these changes.

**Residency Verification Procedures**: The Ohio Department of Education released guidance regarding recommended procedures for conducting monthly and annual residency verifications. The Enrollment and Residency Policy, located at or around policy 241.5, has been updated to address this new guidance. Additionally, two new appendices, which can be inserted into your policy notebook as Appendix 241.5-A and 241.5-B, have been developed to assist in your verification of student residency information. Please be sure to fill in the blanks in this policy consistent with your sponsorship contract, and insert a percentage of enrolled students that will be randomly reviewed each month in the appendices. We recommend that the School review the residency information of at least five percent of students per month.

**High School Graduation Requirements:** Pursuant to the Budget Bill, graduation requirements for students entering ninth grade in the 2019-2020 school year have changed. Students in the graduating class of 2024 and beyond will be required to do the following to earn a high school diploma: complete all existing course requirements and earn a minimum of 20 academic credits; earn at least two diploma seals, with some restrictions on the combination of seals that may be used; and take five end-of-course exams, though students must only pass the ELA II and Algebra I. Students who fail either ELA II or Algebra I end-of-course exams must retake the failed assessment at least once. However, if a student fails to obtain a passing score on the retake exam, the student may still earn a high school diploma through several avenues. Current high school students may also utilize the new high school graduation requirements as an alternative path to a diploma. Students in all graduating classes also may now utilize one unit of computer coding in lieu of a foreign language credit if the School requires foreign language credit to graduate. If a student applies more than one computer coding course to satisfy foreign language requirements the courses must be sequential and progressively more difficult. The graduation requirements policy and appendix, located at or around policy 244.1 and Appendix 246-A in your policy notebook, have been updated to reflect these new graduation requirements.

**Diploma Seals:** Students entering ninth grade for the first time in the 2019-2020 school year will be required to earn at least two (2) diploma seals in order to graduate. Existing high school students will also be eligible, though not required, to earn new diploma seals. Requirements for most diploma seals will be established by the Ohio Department of Education in the coming months. However, the School must develop its own guidelines for earning a fine arts and performing seal, a student engagement seal, and/or a community service seal. We have attached standard guidelines as an appendices for each of these new seals, which can be added to your policy notebook at or around Appendix 244-C to 244-E. Please contact our office if the School wishes to establish alternative minimum standards for earning the fine and performing arts seal, a student engagement seal, and/or a community service seal.

**Physical Education Waiver**: Pursuant to the Budget Bill, a school may choose to excuse students from the high school physical education requirements if the student who, during high school, has participated in two full seasons of interscholastic athletics, marching band, show choir, or cheerleading, or in the junior reserve officer training corps (“JROTC”) for at least two full school years. Students who must also complete one-half unit in another course of study instead of P.E., unless the student received course credit for participation in JROTC. We have included a new optional policy providing the terms of the wavier, was well as an appendix with a waiver application form, located at or around policy 244.2 and Appendix 244.2-A, respectively.

**Students At-Risk of Not Graduating:**  No later than June 30, 2020, all schools serving grades nine through twelve must adopt a policy requiring an individual graduation plan for each high school student. Policies must also specify the criteria the School will use to identify students who are at-risk of not graduating from high school. Parents must be invited to participate in the development of graduation plans and notified when their child is determined to be “at-risk.” Accordingly, attached is a policy and corresponding appendices for this purpose.

**Notice of Excessive Absences:** As a result ofchanges from the Budget Bill, the School must only count nonmedical excused absences when calculating excessive absences triggering a required notice to parents. Your Attendance/Truancy/Withdrawal policy, located at or around policy 251 in your policy notebook, has been amended to add this exclusion. Please be sure to fill in the blanks in this policy.

**English Learners**: The recent Budget Bill changes the designation of “Limited English Proficient Student” to “English learners.” Applicable policies located throughout your policy notebook were updated to reflect this new language.

**Educational Assistants/Paraprofessionals:** The Ohio General Assembly opted to remove the recently added provision requiring community school teachers and paraprofessionals be “properly licensed and certified.” Accordingly, references to this restriction have been removed from the Educational Assistants/Paraprofessionals policy, located at or around policy 317 in your policy notebook.

**Bus Drivers:** Changes to existing law now require bus drivers who are arrested, summoned, or indicted for an alleged violation of a certain criminal offenses be suspended from any job duties that put them in charge of the care, custody, or control of children. The Other Employees policy, located at or around policy 318 of your policy notebook, has been updated to include this restriction.

**Animal Request and Verification:** Our office created a form that corresponds with our Use of Animals in the Classroom of on School Premises policy, located at or around policy 415. This form should be used by individuals seeking to bring an animal into the School, unless the animal is a service animal and is permitted pursuant as an accommodation for a student or faculty member with a disability.

Please do not forget to update your table of contents with any new policies, changed titles, or new appendices. We have included our Table of Policy Changes specifying the policies requiring board approval. Any existing policies subject to these updates should be replaced with the new version upon board adoption. As always, we remain available for questions or assistance.

Very truly yours,



Amy J. Borman

Adam Schira

Stephanie L. Teaford

Chelsea L. Berger

**Table of Policy Changes**

| **Approximate Policy/Appendix Number** | **Policy/Appendix Title** | **Relevant Statute/Rule****(if applicable)** | **Board Vote****Required?** |
| --- | --- | --- | --- |
| 148.8 | Federal Grants Procurement, Monitoring, and Administration | 2 C.F.R. 200; 2 C.F.R. 175.15 | Yes |
| 148.10 | Cost Principles and Financial Management for Use of Federal Funds | Uniform Grant Guidance, 2 C.F.R. 200 et seq.; 2 C.F.R. 200.302; 2 C.F.R. 200.305; 2 C.F.R. 200.430; 2 C.F.R. 200.431 | Yes |
| 204.16 | Cyber Threat (NEW) |  | Yes |
| 241.5 | Enrollment and Residency Policy | R.C. 3314.03(A); R.C. 3314.11; R.C. 3313.64(B)(1); R.C. 3313.64(K) | Yes |
| 242.1 | Security Provisions for Statewide Assessment Tests | OAC 3301-7-01; OAC 3301-13-05 | Yes |
| 244.1 | Graduation Requirements- Classes of 2018, 2019 and 2020 Only | Ohio 132nd General Assembly, House Bill 49, Section 733.67; Ohio 132nd General Assembly, House Bill 491, Section 3 | Yes |
| 244.2 | Physical Education Waiver (NEW) | R.C. 3313.603(L) | Yes  |
| 245 | Promotion and Retention Policy | R.C. 3313.608; 3313.609; 3301.0710; 3301.0711; 3313.6411(B); 20 USC 1400 et seq. | Yes |
| 248 | At-Risk Policy (NEW) | R.C. 3313.617 | Yes |
| 251 | Attendance/Truancy/Withdrawl | R.C. 2151.011; R.C. 2151.27; R.C. 3314.03(A)(6); R.C. 3314.11; R.C. 3321.01; R.C. 3321.041; R.C. 3321.13-.191; O.A.C. 3301-69-02 | Yes |
| 317 | Educational Assistants/Paraprofessionals | R.C. 3319.088; R.C. 3319.291; R.C. 3319.39; R.C. 3319.391; O.A.C. 3301-20-01; 3301-24-05; 3301-25 | Yes |
| 318 | Other Employees | R.C. 3319.291; R.C. 3319.39; R.C. 3327.10(J); R.C. 3319.391; O.A.C. 3301-20-03; O.A.C. 3301-20-03; O.A.C. 3301-83-23 | Yes |
| App.148.8 | Methods of Procurement Using Federal Grant Funds |  | No |
| App.204.16 | Cyber Threat Incident Response Plan (NEW) |  | No |
| App.241.5-A | Residency Verification Procedures (NEW) | R.C. 3314.03; R.C. 3314.11 | No |
| App.241.5-B | Monthly Residency Verification Report (NEW) | R.C. 3314.03; R.C. 3314.11 | No |
| App.244-A | Physical Education Waiver Form (NEW) | R.C. 3313.603(L) | No |
| App.244-C | Community Service Seal (NEW) | R.C. 3313.6114 | No |
| App.244-D | Fine & Performing Arts Seal (NEW) | R.C. 3313.6114 | No |
| App.244-E | Student Engagement Seal (NEW) | R.C. 3313.6114 | No |
| App. 246-A | Graduation Requirements | R.C. 3313.618; R.C. 3314.03; Section 733.51 | No |
| App. 248-A | Graduation Plan Invitation Letter to Parent (NEW) | R.C. 3313.617 | No |
| App. 248-B | Parental Notification That Student is At-Risk of Not Graduating (NEW) | R.C. 3313.617 | No |
| App. 248-C | Graduation Plan (NEW) | R.C. 3313.617 | No |
| App. 415-B | Animal Request and Verification Form (NEW) |  | No |

**148.8 Federal Grants Procurement, Monitoring, and Administration**

In addition to the applicable policies set forth elsewhere in this manual, the following policies shall apply when the School expends federal grant funds to purchase property or obtain services.

A. Competition. To the extent required by law, the School shall use procurement methods that provide for full, free, and open competition and comply with the federal procurement regulations. If the School solicits bids or competitive proposals to secure property or services, the School shall award the contract to the party whose bid or proposal, after considering all appropriate facts, is most advantageous to the School.

The School shall exclude from competition for procurements any contractor that develops or drafts specifications, requirements, statements of work, or invitations for bids or requests for proposals.

Unless allowed by law, the School shall not use statutorily or administratively imposed State, local, or tribal geographical preferences in the evaluation of bids or proposals.

B. Code of Conduct. No employee, officer, or agent of the School shall participate in selecting, awarding, or administering a contract supported by federal funds if a conflict of interest, real or apparent, would be involved. A conflict arises when the employee, officer, or agent, a member of his/her family, his/her partner, or the employer or prospective employer of any of the above-mentioned individuals has a financial or other interest or a tangible personal benefit from the company selected to be awarded the procurement contract.

No employee, officer, or agent of the School may solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. Any gratuities, favors, or anything of monetary value includes money and every other thing of value, meaning having more than a de minimis or nominal worth.

All employees, officers, or agents of the School must disclose in writing any potential conflicts of interest, whether real or apparent, to the School prior to participation in the selection, award, or administration of a contract supported by a federal award.

The School shall not conduct any procurement action involving a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, if the School would be unable or appear to be unable to be impartial in that procurement action.

Any employee, officer, or agent of the School found to have violated this Code of Conduct or any other applicable ethics laws or regulations will be immediately excluded from further participation in the selection, award, or administration of the contract supported by a federal award and may be subject to disciplinary actions, up to and including termination. The School shall promptly report any violation of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting a federal award to the awarding federal agency and specify any corrective action taken by the School.

Nothing in this policy shall be read to alter the obligations and restrictions on public officials pursuant to Ohio Revised Code Chapters 3314 and 102, and Section 2921.42-.44 as applicable to community schools.

C. Procurement Procedures. To the extent required by law:

1. The School shall review any proposed procurement to avoid purchasing unnecessary property or services. The School shall avoid purchasing duplicative items.
2. Before acquiring an item, the School shall compare the advantages of leasing and purchasing property, purchasing surplus property, or sharing services where permitted by law in order to determine the most economical approach. The School shall also consider consolidation or breaking out procurements to obtain more economical purchases.
3. Prior to accepting bids or proposals, the School shall make independent estimates of cost and price. The School shall conduct a cost or price analysis in connection with every procurement transaction, including contract modifications. This shall include making independent estimates before receiving bids or proposals.
4. The School shall ensure that its solicitations for goods and services contain clear and accurate descriptions and technical requirements of the goods and services sought, all factors to be used in evaluating bids or proposals, and provide any other information required under the applicable federal regulations. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The School shall not require brand name products unless the brand name is specified as a means to define the performance or other salient requirements of procurement.
5. The School shall attempt to ensure that the parties with which it contracts are responsible and capable of fulfilling the terms and conditions of the contract. The School shall give consideration to the contractor’s integrity, compliance with public policy, record of past performance, and financial and technical resources.
6. The School shall only use time and material type contracts after a determination that no other contract is suitable and, if a contract includes a ceiling price, the contract must specify that the contractor exceeds the ceiling at its own risk.
7. The School shall create and maintain records that document the procurement process that the School followed in each procurement transaction, including the rationale for utilizing the selected procurement method, the selection of contract type, the basis for awarding or rejecting the contract, the justification for lack of competition if competitive bids or proposals are not sought, and the basis for the award cost or price.
8. The School shall make its procurement records available for review upon request by the awarding federal agency or pass-through entity.
9. Before deciding to use grant funds to host or attend a meeting or conference, the School shall ensure that the meeting or conference is (a) consistent with the School’s approved grant application, (b) necessary to achieve the goals and objectives of the grant, and (c) for purposes of disseminating technical information, and (d) that the School has used only the grant funds necessary to accomplish legitimate meeting and conference business.
10. Whenever practicable, the School shall utilize lower cost alternatives in lieu of attending meetings or conferences.
11. When issuing statements, press releases, requests for proposals, bid solicitations, and other documents relating to the use of federal grant funds for procurement purposes, the School shall state the percentage of the total cost funded by federal money, the dollar amount of federal funds available for the project or program, and the percentage and dollar amount of the total cost of the project or program financed by non-governmental sources.

D. Contract Provisions. Procurement contracts shall, at minimum, include the terms and conditions that are required by the applicable federal procurement regulations, including all necessary terms as required by the Trafficking Victims Protection Act of 2000 (TVPA). To the extent required by law, the School shall require that the person awarded a contract satisfy the bonding requirements set forth in the applicable federal regulations and shall comply with the TVPA and its corresponding regulations.

E. Contract Administration. The School shall delegate to one or more school employee the responsibility for administering all procurement contracts and ensuring that the party awarded the contract satisfies the terms, conditions, and specifications of the procurement contract or purchase order.

F. Small/Minority/Women Businesses. The School shall take affirmative steps to contract with small businesses, minority-owned firms, and women’s business enterprises when possible. The School shall also require a contractor, if it subcontracts, to take affirmative steps to contract with small businesses, minority-owned firms, and women’s business enterprises when possible.

G. Dispute Resolution. Any issues related to the procurement contract and administrative procedures, including source evaluation, protests, disputes, and claims, will be resolved according to the following dispute resolution procedures, and the School will disclose information regarding the dispute to the appropriate federal officials. Any grievant must file a written complaint requesting an opportunity to be heard by the Governing Board or the Board’s designee. The Board or its designee will review any information presented and provide a written decision within a reasonable time. If the grievant is not satisfied with this decision, the matter shall be submitted to a qualified mediator for mediation. The parties will make every attempt to resolve such disputes through mediation and shall equally split all fees or costs of any third party mediator.

If the School suspects or determines that the contractor has likely violated local, state, or federal law, the School will refer the matter to the proper authority having jurisdiction over the matter.

H. Time and Materials Contracts. The School may use a contract whose cost to the School is the sum of the Actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit, but only:

1. After a determination that no other contract is suitable; and

2. If the contract includes a celling price that the contractor exceeds at its own risk.

I. Debarred, Suspended, or Ineligible Contractor. The School shall not award contract to parties that have been debarred, suspended, or otherwise excluded from or are ineligible for participation in Federal assistance programs and activities pursuant to the federal System for Award Management available at www.sam.gov.

The school shall verify that the contracting party is not excluded or disqualified by checking the federal system for award management, collecting a certification from the contracting party, or adding a clause or condition to the covered transaction with the contracting party.

J. Federal Grant Administration

The School shall ensure that these procedures are followed with respect to all federal grant applications submitted by the School and all federal grants that are awarded to the School.

1. Monitoring Grant Applications. The School shall delegate to one or more persons the responsibility for monitoring all pending federal grant applications, and that person or persons shall provide the Board with a report on the status of all federal grant applications at each regularly scheduled Board meeting.

2. Monitoring Grant Expenditures. The School shall delegate to one or more persons the responsibility for monitoring federal grant expenditures, and that person or persons shall provide the Board with a report on the expenditures made from each federal grant at each regularly scheduled Board meeting.

3. Final Expenditure Reports. The School shall delegate to one or more persons the responsibility for reviewing all final expenditure reports for each federal grant that the School was awarded, reconciling the report(s) with the School’s financial records, and ensuring that the final expenditure report for each federal grant is complete and accurate.

4. Maintenance of Procurement Records. The Treasurer or his or her designee shall be responsibile for maintaining records sufficient to detail the history of all procurements. For example, records of the rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

*2 C.F.R. 200*; *2 C.F.R. 175.15.*

See Appendix 148.8-A Methods of Procurement Using Federal Grant Funds. See also Policy 114 Ethics and Conflicts Policy, Policy 148.2 Fixed Asset Policy/Title I and Federal Grant Assets Policy, Policy 149 Use of Cellular Telephones and Other Wireless Technologies, and Policy 205 Program Assessment.

**148.10 Cost Principles and Financial Management for Use of Federal Funds**

Federal grant awards will be administered efficiently and effectively through the application of sound management practices consistent with federal, state, and local laws, including the federal Uniform Grant Guidance, and any underlying grant agreements.

**Financial Management**

Grant funds must be managed in compliance with all applicable federal, state and local laws and rules as well as the terms of any federal grant award.

The School shall do all of the following:

1. Identify in its accounts all federal award funds received and expended and shall specify the federal program under which those awards were received. Whenever applicable information is available, accounts must include the Catalog of Federal Domestic Assistance (“CFDA”) title and number, the federal award identification number and year, the name of the awarding federal agency, and the name of the pass-through entity.
2. Make accurate, current and complete disclosures of the financial results of each federal grant award as required by the terms the award.
3. Maintain records that adequately identify the source and application of funds used for federally funded activities. Records must contain information about the awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and shall be supported by source documentation.
4. Exercise control over and accountability for all funds, property and other assets purchased with federal funds. All assets shall be safeguarded and the School shall assure that they are used only for authorized purposes.
5. Regularly compare expenditures with budget amounts for each federal award.

**Cost Principles**

All costs must conform to any limitations or exclusions set forth in the federal award. Costs must be accorded consistent treatment. The School shall only assign a cost to a federal award as a direct cost when no other cost incurred for the same purpose in like circumstances has been allocated as an indirect cost. Costs shall not be included to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.

Costs shall be determined in accordance with generally accepted accounting principles (“GAAP”) and shall be consistent with policies and procedures that apply uniformly to both federally-financed and non-federally financed activities.

All costs must be adequately documented and shall be necessary, reasonable and allocable to the performance and administration of the relevant federal award. A cost must be allocable to a particular federal award or other cost objective if the goods or services in accordance with relative benefits received.

Costs must be reasonable in both the nature and amount. The following shall be considered when to determine if a cost is reasonable:

1. Whether the cost is a type recognized as ordinary and necessary for the School’s operation or for the proper and efficient performance of the federal award;
2. Applicable restraints imposed on the cost, including sound business practices, arm’s-length bargaining, relevant federal and state laws and rules, and terms and conditions of the awards;
3. Market prices for comparable goods and services for the geographical area;
4. Whether individuals authorizing the cost acted prudently when considering the costs; and
5. Whether the cost amounts to a significant deviation from established School practices that may unjustifiably increase costs.

**Payments**

Methods of payments utilized by the School must minimize the time elapsing between the transfers of funds to and from vendors. Any funds drawn in advance must be as close in time to the actual related expenditure as feasible.

**Compensation**

Employee or contractor compensation, including wages, salaries and fringe benefits, shall be permitted to the extent that:

1. The rate of compensation is reasonably consistent with (a) compensation paid for similar work in other activities by School employees or contractors, if any, or (b) compensation for similar work in the labor market; and
2. Compensation is supported by records that accurately reflect the work performed.

The School shall comply with all requirements to document the time and effort of personnel whose compensation is funded in whole or in part using federal grant funds. Reports must provide reasonable assurances that personnel charges are accurate, allowable and properly allocated. Time and effort reports shall be maintained by the School and shall comply with the School’s established accounting practices.

Travel payment and reimbursement provided from federal funds must include documentation that demonstrates that the participation of the individual is necessary to the federal award and the costs are reasonable and consistent with the School’s policies.

*Uniform Grant Guidance, 2 C.F.R. 200 et seq.; 2 C.F.R. 200.302; 2 C.F.R. 200.305; 2 C.F.R. 200.430; 2 C.F.R. 200.431.*

See also **Policy 148.2 Fixed Asset Policy/ Title I and Federal Grant Asset Policy** and **Policy 148.8 Federal Grants Procurement, Monitoring, and Administration.**

**204.16 Cyber Threats**

**Types of Information**

Information is everywhere and constantly going from one person to another, from one device to another, etc. By law, some information is protected from disclosure, and, while some information is not technically legally-protected information, it nonetheless has value.

**Types of Threats**

The most common types of threats are:

* Data Breach. A leak or spill of sensitive, protected, or confidential data from a secure environment to an insecure environment, where the data may then be copied, transmitted, viewed, stolen, or used in an unauthorized manner. Data breaches often occur with confidential information.
* Denial of Service. Also known as a Distributed Denial of Service (“DDoS”) attack, occurs when a server is deliberately overloaded with requests such that the Website shuts down. Users are then unable to access the Website.
* Spoofing/Phishing. Both spoofing and phishing involve the use of fake electronic documents. Spoofing refers to the dissemination of an email that is forged to appear as though it was sent by someone other than the actual source. Phishing is the act of sending an email falsely claiming to be a legitimate organization in an attempt to deceive the recipient into divulging sensitive information (e.g., passwords, credit card numbers, or bank account information) after directing the user to visit a fake website.
	+ Spear phishing is a more targeted form of phishing and typically involves sending an email that appears to come from a colleague or acquaintance.
* Malware/Scareware. Illicit software that damages or disables computers or computer systems. Similar to malware is scareware, which uses social engineering to cause fear or anxiety so that a user buys unwanted and unneeded software, such as antivirus software. Computers can become infected through downloading a piece of malware or scareware disguised as legitimate software from peer-to-peer file sharing or email attachments or links. To help prevent malware or scareware, users should keep their software up to date so that any critical software patches are received. Users should also install antivirus software.
	+ Ransomware is form of malware in which perpetrators encrypt users’ files, then demand the payment of a ransom—typically in virtual currency such as Bitcoin—for the users to regain access to their data. Ransomware can also include an element of extortion, in which the perpetrator threatens to publish data or images if the victim does not pay. The ransomware is frequently delivered through phishing/spoofing scams.
* Unpatched or Outdated Software Vulnerabilities. Vulnerabilities occur when unpatched or outdated software has not been updated to include the latest software updates allowing unauthorized users to gain access to information networks and systems.
* Removable Media. Media devices that can be connected to computers (e.g. thumb drives, CDs, DVDs, and external hard drives) can be easily stolen, exposing private data. Corrupted devices can be intentionally or unwittingly connected to computers allowing the device to infect the computer with malware.

**Types of Security and Preparing for Threats**

The School takes a holistic approach to security. There are several security “layers”, and each one has its own security strategy as outlined below:

|  |  |
| --- | --- |
| * Physical Security
 | The security of brick and mortar buildings, as well as the students, faculty, and staff that learn, teach, and work in them.. |
| * Network Security
 | Focused on ensuring there is not any unauthorized traffic flowing across the network that no one is abusing or gaining illegitimate access to network-connected resources and that sensitive information is security while it is traversing the network (data in motions). DDoS attacks are a form of network resource abuse, and mitigating those attacks is a critical component of network security.  |
| * Application Security
 | Eliminating software vulnerabilities that could lead to security breaches.  |
| * Content Security
 | Focused on protecting data at rest (e.g., in a database) and on complying with various local, state, and federal requirements for data security and privacy.  |
| * End Point Security
 | Traditionally concerned with keeping malicious or otherwise unwanted and unauthorized software and users of endpoint devices. This includes asset location tracking and processes for eliminating sensitive data from and reporting lost or stolen devices.  |
| * Cloud/Data Center Security
 | Focused on ensuring the School’s core computing resources are appropriately patched and segmented to prevent unauthorized access and contain any unauthorized access if it does occur.  |

**Identifying an Incident**

When a security incident occurs, the School’s Incident Response Plan will enable the School to focus on containment, rather than identifying the people and processes that need to occur. A successful incident management program combines people, processes, and technology.

**Reporting and Incident**

In the event of a suspect incident, the School’s Principal of his or her designee and the School’s IT Director should be immediately notified with details regarding the reasons underlying the suspicion. The Incident Response Team (“IRT”), which shall include the Principal or his or her designee and the IT Director, will work to limit the damage and preserve the protected/sensitive information, and determine the amount of outside external assistance required to assist with addressing the threat.

Any individual whose personal information may have been compromised may make a report to any of the following:

* FBI, via a Field Office Cyber Task Force;
* Internet Crime Complaint Center;
* National Cyber Investigative Joint Task Force (cywatch@ic.fbi.gov);
* National Cybersecurity and Communications Integration Center (NCCIC@hq.dhs.gov); or
* U.S. Computer Emergency Readiness Team (“US-CERT”).

Once the incident has been contained, recovery may be needed for people, policies, and technology—all of which are interconnected. The IRT will need to identify the technology and people impacted by the incident, and address any known causes or existing vulnerabilities.

Appendix 204.16-A Cyber Threat Response Plan.

**241.5 Enrollment and Residency Policy**

The School admits students residing in the home district of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, and [\_\_\_\_] contiguous districts, **OR**, [\_\_\_\_] statewide [check one] (“admissions areas”). The School serves grades \_\_\_\_ - \_\_\_\_ and/or ages \_\_\_\_ - \_\_\_\_ as per its Community School Contract with its Sponsor.

A child shall be admitted to the School as a student, if the child’s parent resides in the School’s admission areas. Residency is not determined solely by where the parents own or rent a home or an apartment, but rather by where the primary residence is and where substantial family activities take place. Any one (1) of the following documents can be used to establish proof of residency for verification of a child’s ability to be enrolled. These items must be current, be in the parent’s name, and include a street address. A post office box address cannot be used to validate residency records:

1. A deed, mortgage, lease, current home owner’s or renter’s insurance declaration page, or current real property tax bill; or
2. A utility bill or receipt of utility installation issued within ninety days of enrollment; or
3. A paycheck or paystub issued to the parent or student within ninety days of enrollment that includes the address of the parent’s or student’s primary residence; or
4. The most current available bank statement issued to the parent or student that includes the address of the parent’s or student’s primary residence; or
5. A voter registration card issued to the parent or student; or
6. Documented affirmation of the parent’s address from the district of residence where the parent currently resides; or
7. A USPS return receipt from a certified letter sent to the parents by the district of residence; or
8. Written confirmation of the parent’s current address from the Ohio Department of Job and Family Services; or
9. Written confirmation of the parent’s current address from a local law enforcement agency; or
10. Any other official document issued to the parent or student that includes the address of the parent’s or student’s primary residence and as approved by the Ohio Superintendent of Public Instruction.

If there is a change in the location of the parent or student’s primary residence, the student’s parent must notify the School immediately.

The School shall monthly review the residency records of students enrolled in the School and shall provide an annual verification to the Ohio Department of Education that students are entitled to attend the School. Notwithstanding anything contrary in this policy, after a student’s initial submission of one of the approved proof of residency records for enrollment purposes, the School may utilize either: one (1) newly submitted proof of residency documents listed in (a) through (j), or one (1) signed parent statement identifying the student’s primary home address in order to conduct the monthly and annual verification. The Principal or his or her designee will compare each submitted proof of residence with the School’s EMIS records to ensure that EMIS reporting is accurate that students are permitted to enroll.

All custody or court orders pertaining to the family or student must be turned in when asked, or at admission. If the School and Parent disagree as to residency status, the Superintendent of Public Instruction shall determine the public school in which the student may enroll. If the School and the Student’s home district (district of residency) disagree about residency, this policy shall supersede any policy concerning the number of documents for initial residency verification adopted by the student’s home district. If the district of residence challenges the student’s residency, the Principal may request additional documentation from the Parent, which may be provided to the student’s home district.

*R.C. 3314.03(A); R.C. 3314.11; R.C. 3313.64(B)(1); R.C. 3313.64(K)*

See also Appendix 241.5-A Residency Verification Procedures; Appendix 241.5-B Monthly Residency Verification Report; Policy 204.8 Migrant Students; Policy 241 Admissions and Lottery Standards; Policy 241.3 Compulsory and Early Kindergarten Admissions; Policy 252 Missing and Absent Children; Policy 294 Student Records and Release of Information; Policy 297 Homeless Children and Youth Policy; and Policy 298 Grandparent Caretaker Policy.

**242.1 Security Provisions for Statewide Assessment Tests**

A. Administrative Organization. The Principal or his/her designee will serve as the School coordinator for the Statewide assessments and is responsible for distributing, collecting, and securing (in a locked cabinet or closet) all testing materials while they are in the School and appointing specific staff members to serve as test examiners.

Examiners are responsible for distributing, administering, proctoring, collecting, and securing all test materials while they are in their possession.

The Principal or his/her designee and other staff members specifically designated to administer the tests are the only persons authorized to have access to the test materials or to be present in the testing room(s).

B. Security and Ethical Use of Test Materials. Achievement tests and all material developed for use for testing in any form (except practice tests) are “secure materials.” All testing examiners and classroom teachers giving the test must follow these provisions, as well as the provisions of established by the Ohio Department of Education. It is unethical and illegal to: (1) alter a Student’s responses or assist a Student in cheating in any way; (2) use, or help others to use, any secure materials to prepare Students for the test or to assist Students who have failed the tests; (3) reproduce any secure materials; (4) release secure materials to Students, parents, or any other individual or group.

C. Test Security Violations. All staff members are encouraged to voice any concern about any practice they consider unethical and/or inappropriate by reporting the alleged unethical activity to the Principal or his/her designee in writing. Any alleged test security or ethical violation will be investigated by the Principal or his/her designee. If it is determined that a violation occurred, any of several consequences may follow:

1. All security or ethical breeches must be reported to the Ohio Department of Education within ten (10) days of any violation.
2. One or more answer sheets may not be scored.
3. The Board, after appropriate procedures are followed, may terminate or otherwise discipline an employee found guilty of a violation.
4. The State Board of Education, following appropriate procedures, may seek the suspension of an educator’s license certificate.
5. A law enforcement agency, following an appropriate investigation, may prosecute under Ohio’s criminal code.

Prior to commencing an Ohio Department of Education investigation and taking action as a result of an allegation of a test security violation, the State Board of Education will provide the individual with notice of the allegation and an opportunity to respond and present evidence.

D. Building Administration. All coordinators and examiners are responsible for ensuring that all test security provisions are followed while the test materials are at the School. All test coordinators and classroom teachers giving the test must read the Directions for Administration and Rules for Testing prior to the testing dates. All test coordinators must keep these booklets on file. The tests will be serially numbered and wrapped in sealed packages when they arrive at the test sites. The testing coordinator is to open the sealed packages at the appropriate time, check and verify in writing the accuracy and receipt of all test materials, and prepare the test booklets. Since testing coordinators are required to account for and return all materials, they must carefully track the materials before, during, and after test administration. This responsibility includes the timely packing and shipping of all used materials and transporting any unused materials to the Principal or his/her designee for shipment. Careful written recordkeeping and thorough rechecking are essential throughout the testing process.

E. Final Accounting of Missing Materials. Whenever possible, testing materials are computer scanned before they are shipped to the School and scanned again after they are returned to the testing company. Should any testing materials be unaccounted for after testing materials are returned to the testing company, the Principal or his/her designee, along with the appropriate examiner(s), will conduct a thorough investigation. If, after the investigation of all written records, the materials are still unaccounted for, the Principal or his/her designee will report his/her findings the Ohio Department of Education. If further investigation should occur, the individual(s) involved will be provided with an opportunity to respond to the charges and present a defense.

F. Communication of this Policy with Students and Staff. By the first of October each school year, the Principal will ensure that this policy is handed out to and discussed with students participating in the assessments, as well as staff members who administer the assessments, are authorized to be in the assessment room, and/or who have access to the assessment materials. Students and staff shall be reminded orally prior to each test administration period.

G. Participation of Students with Disabilities. Students with disabilities participate in the Statewide assessments, with appropriate accommodations, as necessary. Decisions about how a Student with a disability will participate in any statewide assessment program will be made by the IEP team. The IEP developed for a disabled student must specify the manner in which the student will participate in the state achievement assessments. See Policy 242.2 Alternate Assessments for Students with Disabilities.

H. Participation of English Learners. Students that are English learners participate in the Statewide assessments according to the applicable rules and laws. They may receive approved accommodations following consultation with their instructor.

*OAC 3301-7-01; OAC 3301-13-05*

See Appendix 242.1-A Standards for the Ethical Use of Tests.

**244.1 Graduation Requirements- Classes of 2018, 2019 and 2020 Only**

The School expects that most students will graduate by meeting one of the four (4) existing pathways to graduation. However, as a result of changes to graduation assessment requirements, the School acknowledges that not all students will be successful in meeting the new testing standards required by law. For this reason, so long as students take and pass required curriculum courses and complete all end-of-course exams\*, students shall be eligible to earn a high school diploma without achieving the required cumulative passing score on end-of-course exams, if either:

1. Students meet at least two of the following:
* Students who enter ninth grade for the first time between July 1, 2014 and June 30, 2016 (“Classes of 2018 and 2019”), an attendance rate of 93% during the 12th grade year;
* Earn a GPA of 2.5 on a 4.0 scale in all courses completed during the 12th grade for the Classes of 2018 and 2019, and a 2.5 on a 4.0 scale in all courses completed during 11th and 12th grade for students entering ninth grade for the first time between July 1, 2016 and June 30, 2017 (“Class of 2020”) (must complete at least 4 full-year or equivalent courses);
* Successfully complete a capstone project during 12th grade. Student capstones for the Class of 2020 must be evaluated based on the framework that will be developed by the Ohio Department of Education;
* During 12th grade, complete a work or community service experience totaling 120 hours, including internships, work study, co-ops, and apprenticeships as approved by the School. Approval and verification of student work for students in the Class of 2020 must comply with the guidance developed by the Ohio Department of Education and the Governor’s Office of Workforce Transformation;
* Earn 3 or more transcripted credits through College Credit Plus at any time during high school;
* Earn credit for an Advanced Placement or International Baccalaureate course and earn an AP exam score of 3 or higher or an IB exam score of 4 or higher at any time during high school;
* Earn a WorkKeys exam score of 3 on each of the 3 test sections;
* Earn a State Board-approved industry-recognized credential or credentials that equal at least 3 points; or
* Meet OhioMeansJobs Readiness Seal requirements.
1. Career-Technical Education students\*\* complete at least 1 of the following:
* Earn a total score of proficient or better based on all career-technical exams or test modules;
* Earn an industry-recognized credential or credentials that equal 12 points; or
* Complete a workplace experience, pursuant to an agreement between the School, the student and the employer, totaling 250 hours with evidence of positive evaluations.

\*If a student receives a score of “1” or “2” on any math or English language arts test, the student must retake the test at least once.

\*\*Students must finish a career-technical program that includes at least 4 courses in a single career pathway.

*Ohio 132nd General Assembly, House Bill 49, Section 733.67; Ohio 132nd General Assembly, House Bill 491, Section 3.*

**244.2 Physical Education Waiver**

Any student who, during high school, has participated in either two full seasons of interscholastic athletics, marching band, show choir, or cheerleading, or has participated in the junior reserve officer training corps (“JROTC”) for at least two (2) full school years, shall not be required to complete any physical education course as a condition to graduate. In lieu of a physical education course, the student shall be required to complete one-half (1/2) unit, consisting of at least sixty (60) hours of instruction, in another course of study. Credit received for participation in the junior reserve officer training corps may be used to satisfy the requirement to complete one-half (1/2) unit in another course of study.

Nothing in this policy denies participation in any physical education course to students who want to participate.

*R.C. 3313.603(L).*

See **Appendix 246-A** What It Takes to Earn an Ohio High School Diploma. See also **Appendix 244-A** Physical Education Waiver Form.

**245 Promotion and Retention Policy**

The Board recognizes that the personal, social, physical, and educational growth of children will vary, and that they should be placed in the educational setting most appropriate for their needs at the various stages of their growth. Each student will be moved forward in a continuous pattern of achievement and growth that is in harmony with his/her own development. Parent(s) and students are made aware of the instructional objectives, performance standards, and promotion criteria. Periodically during the year teachers shall provide written progress and grade reports. Teachers will also provide evaluation reports to parent(s) and students during teacher-parent conferences. The grading system used to measure student progress toward achieving the predetermined instructional objectives and performance standards is applied consistently throughout the School. All promotion and retention decisions are subject to the third grade reading guarantee requirements.

Promotion

A student will be promoted from one grade to the next provided the student meets the applicable promotion criteria. The decision to promote a student shall rest solely with the Principal, with appropriate input from the student's teacher(s), the professional staff, and parent(s).

Retention

A student is required to be retained if he/she is truant for ten percent (10%) or more of the required school days and has failed at least two (2) courses of study, unless the Principal and the teachers of the failed subjects determine that the student is academically prepared to be promoted.

Additionally, a student shall not be promoted or allowed to pass to a higher grade or course level if the student fails to meet established standards for a particular grade or course level.

Retention decisions will be made only after the Principal or applicable teachers have notified and conferred with parent(s) as to the student's progress or lack thereof. These notifications and conferences will take place as soon as teachers and the Principal identify that a student's promotion could be in jeopardy.

Factors

Teachers and the Principal will consider at least the following factors in arriving at decisions on promotion or retention. Factors are applicable in all grade levels.

* The student's level of academic aptitude and achievement;
* The student's level of social and emotional development and the student’s ability to effectively interact with other students in his/her current grade level;
* The student's attendance patterns (absences, tardies, early checkout, excused, or unexcused) and its effect on the student’s progress; and
* Any other factors thought to be appropriate by the Principal, teacher(s), and professional staff.

The School will not utilize a Student’s failure to attain a specified score on any statewide achievement assessment as a factor in any decision to deny a Student’s promotion to a higher grade level, except that the School may use a Student’s failure to attain a score in at least the basic range as a factor in deciding to deny a Student’s promotion to the next level on the following assessments:

* 3rd grade math and English language arts achievement assessments;
* 4th grade English language arts and math achievement assessments, and the formative or summative social studies assessment prescribed by the School;
* 5th grade English language arts, math, and science achievement assessments;
* 6th grade English language arts and math achievement assessments, and the formative or summative social studies assessment prescribed by the School;
* 7th grade English language arts and math achievement assessments; or
* 8th grade English language arts, math, and science achievement assessments.

The School may choose not to promote to the next grade level a Student who does not take a required statewide achievement assessment or make-up assessment, and who is not exempt from the requirement to take such assessment.

Disabled Students

Promotion and retention of previously identified disabled students shall be subject to the factors and policy above, but shall also consider the contents of the student’s individualized educational plan (IEP).

Third Grade Guarantee

The School will not promote any student to the fourth grade who does not achieve at least the level equivalent to the level designated by the Ohio Board of Education unless:

* The student is an English learner who has been enrolled in U.S. schools for less than three full school years and has had less than three years’ instruction in an English as a second language program;
* The student is a student with a disability entitled to special education and related services and the student’s IEP exempts the student from retention;
* The student demonstrated an acceptable level of performance on an alternative standardized reading assessment as determined by the Ohio Department of Education;
* The student received intensive remediation for reading for two school years but still demonstrates a deficiency in reading and was previously retained in any grades K through 3; or
* All of the following apply:
	+ The student is a student with a disability;
	+ The student has taken the third grade English language arts achievement assessment;
	+ The student’s IEP or 504 plan shows that the student has received intensive remediation in reading for two school years but still demonstrates a deficiency in reading; and
	+ The student previously was retained in grades K-3.

If a student is promoted despite not attaining the Ohio Board of Education specified level (which may change yearly), the student will continue to receive intensive reading instruction in the fourth grade, including an altered instructional day, specialized diagnostic information, and specific research-based reading strategies that have been successful in improving reading among low performing readers.

If the student is retained, the School shall:

* Provide intensive remediation until the student is able to read at grade-level, including intensive interventions in reading and a minimum of ninety (90) minutes of daily reading, that address the deficient areas; and
* Provide each student with a high-performing teacher, as determined by the teacher’s student performance data when available, and performance reviews.

If a student who has been retained demonstrates that he or she is reading at or above grade level, the student may be promoted mid-year to the fourth grade at the Principal’s discretion.

Intervention

Annually, the School will assess the reading skills of each student enrolled in grades 1 to 3 by September 30, and in kindergarten by November 1, and will identify students who are reading below grade level, except those students with cognitive disabilities or other disabilities as authorized by the Ohio Department of Education on a case-by-case basis. The students’ classroom teachers shall be involved in the assessment and identification of students reading below grade level, however such assessment may be administered electronically using live, two-way video and audio connections if the teacher administering the assessment is in a separate location from the student.

For students reading below grade level, the School will:

* Provide written notification to the student’s parent(s) that includes the following:
	+ A statement that the student has been identified as having a substantial deficiency in reading;
	+ A description of the current services that are provided to the student;
	+ A description of the proposed supplemental instructional services and supports that will be provided to the student that are designed to remediate the identified areas of reading deficiency;
	+ A statement that if the student receives a score within a certain range on the assessment to measure English and language arts skills, the student will be retained unless the student is exempt; and
	+ A statement that the assessment is not the sole determinant of promotion and that additional evaluations and assessments are available to assist the School and parent(s) in knowing whether the student is reading at or above grade level and is ready for promotion.
* Provide intensive reading instruction services and regular diagnostic assessments to the student immediately following identification of a reading deficiency, including research-based reading strategies that have been shown to be successful in improving reading among low-performing readers and targeted at the student’s identified deficiencies.
* Develop a reading improvement and monitoring plan within sixty (60) days after receiving the student’s results on the diagnostic assessment. The plan must include:
	+ Identification of the student’s specific reading deficiencies;
	+ A description of the additional instructional services and support that will be provided to the student to remediate the identified reading deficiencies;
	+ Opportunities for the student’s parent(s) to be involved in the instructional services and support;
	+ A process for monitoring the extent to which the student receives the instructional services and support;
	+ A reading curriculum during regular school hours that does all of the following: assists students to read at grade level, provides scientifically based and reliable assessment, and provides initial and ongoing analysis of each student’s reading process; and
	+ A statement that if the student fails to attain a level designated by the Ohio Board of Education on the assessment to measure skill in English language arts expected by the end of the third grade, the student may be retained in the third grade.

Teacher Qualifications

Each student with a reading improvement and monitoring plan shall be assigned a teacher who has at least one year of teaching experience and:

* Holds a reading endorsement on the teacher’s license and has attained a passing score on the corresponding assessment for that endorsement, as applicable; or
* Completed a master’s degree program with a major in reading; or
* Was rated “most effective” for reading instruction consecutively for the most recent two years based on assessments of student growth measures developed by a vendor and that is on the list of student assessments approved by the State Board of Education; or
* Was rated “above expected value added” in reading instruction, as determined by criteria established by the Ohio Department of Education, for the most recent consecutive two years; or
* Earned a passing score on a rigorous test of principles of scientifically research-based reading instruction approved by the State Board of Education; or
* Holds an educator license for teaching grades pre-kindergarten through three or four through nine issued on or after July 1, 2017.

The student may be assigned a teacher with less than one year of teaching experience provided that teacher meets one of the above criteria and is assigned a teacher mentor who also meets the qualifications above.

A student with a reading improvement and monitoring plan who enters the third grade after July 1, 2013 but prior to July 1, 2016, a student who is an English language learner and has been in the United States for three years or less, or a student who has an IEP may be assigned a teacher who holds an alternative credential approved by the Ohio Department of Education or who has successfully completed training based on principles of scientifically research-based reading instruction approved by the Ohio Department of Education. Beginning July 1, 2014, the alternative credentials and training must be aligned with the reading competencies adopted by the State Board of Education.

Nothing in the Third Grade Guarantee prevents a student with a reading improvement and monitoring plan from receiving reading intervention and remediation services from an individual employed as a speech-language pathologist who holds a license issued by the board of speech-language pathology and audiology and a professional pupil services license as a school speech-language pathologist issued by the State Board of Education.

A teacher other than the student’s assigned teacher may provide any services required under the Third Grade Guarantee, provided that the teacher meets the qualification requirements and that the assigned teacher and Principal agree to the assignment. Any such assignment of services must be documented in the student’s reading improvement and monitoring plan.

Reporting Requirement

The School shall annually report to the Department of Education its implementation and compliance with the Third Grade Guarantee.

When a student enrolls in the School, the School will provide the parent(s) with a copy of the most recent School report card.

*R.C. 3313.608; 3313.609; 3301.0710; 3301.0711; 3313.6411(B); 20 USC 1400 et seq.*

**248 At-Risk Policy**

It is the School’s expectation that all students will graduate from high school with a high school diploma; however, the School recognizes that some students from time-to-time may face hardships that put them at-risk of not graduating. For this reason, the School will begin complying with this policy on July 1, 2020.

**Graduation Plan**

The School shall develop a graduation plan for each student enrolled in grades nine through twelve, unless the student is which shall address the student’s academic pathway to meet graduation requirements. The graduation plan shall be developed jointly by the student and a representative of the School. Parents shall also be invited to participate in the development of the graduation plan. The plan shall be updated annually until the student graduates with a high school diploma or is no longer enrolled in the School.

A graduation plan is intended to supplement an existing student success plan. In lieu of a graduation plan, a student with a qualifying disability may use an individualized education program (“IEP”) that contains academic goals substantively similar to those in a graduation plan.

**Criteria and Identification of At-Risk Students**

A student may be considered “at-risk” of not graduating if the student is in grades nine to twelve and has either (a) demonstrated a lack of adequate progress in meeting the requirements for graduation specified in the student’s graduation plan, (b) is at least one grade level behind his or her cohort age group, or (c) the student experiences a crisis that significantly interferes with his or her academic progress.

During the course of the year, teachers have the most frequent and meaningful contacts with students, and are therefore the most likely to first notice that a student is experiencing a crisis that is significantly interfering with the student’s academic progress. If a teacher becomes aware of a student meeting the at-risk criteria, the teacher should notify the Principal or his or her designee of concerns. The Principal or his or her designee in turn will investigate and determine if the student is at-risk of not graduating.

At least once each academic year, the Principal or his or her designee will determine the names of any students who failed to demonstrate adequate progress in meeting graduation requirements or are one or more years behind their respective cohort age group.

**Parental Notification Process**

The Principal or his or her designee shall provide written notice to the parent of any student identified as at-risk of not qualifying for a high school diploma. The written notice shall include a description of the School’s curriculum and graduation requirements, or, if applicable, the requirements for graduation pursuant to a student’s IEP. The notice shall also detail the additional instructional and support services available to the student to earn a high school diploma. Additional instructional or support services will be made available to students at-risk of not graduating. Instructional or support services may include mentoring programs, tutoring, earning credit through demonstration of subject area competency and adjusted curriculum options, career-technical programs, mental or physical health services (to the extent required by an IEP or Section 504 Plan), family engagement and support services, or other services deemed appropriate by the Principal or his or her designee.

*R.C. 3313.617.*

Appendix 248-A Graduation Plan Invitation Letter to Parent, Appendix 248-B Parental Notification That Student is At-Risk of Not Graduating, Appendix 248-C Graduation Plan. Policy 204.14 Career Advising and Student Success Plans.

**251 Attendance/Truancy/Withdrawal**

General Policy

Students enrolled in the School must attend School regularly in accordance with the laws of the State. The educational program offered by the School is predicated upon the presence and punctuality of the student and requires continuity of instruction and classroom participation. A parent must contact the School in accordance with the procedure set forth in Policy 252 whenever a student is absent.

Attendance shall be required of all students enrolled at the School during the days and hours that the School is in session. Attendance need not always be within the School facilities, but a student will be considered to be in attendance if present at any place where School is in session by authority of the Board.

Excused Absences

Absences due to the following will be excused:

1. Personal physical illness that prevents attendance at School (at the discretion of the Principal or his/her designee, a written statement from a physician may be required).
2. Personal mental illness such that the student will not benefit from instruction (at the discretion of the Principal or his/her designee, a written statement from a physician/mental health professional may be required).
3. Illness in the family necessitating the presence of the child (at the discretion of the Principal or his/her designee, a written statement from a physician and an explanation as to why the child's absence was necessary may be required).
4. Quarantine of the home (absence will be excused for the duration of the quarantine as determined by proper health officials).
5. Death in the family (absence will be excused for no more than eighteen (18) hours unless the Principal or his/her designee determines that a longer absence is reasonably necessary).
6. Medical or dental appointments (at the discretion of the Principal or his/her designee, a written statement from a physician confirming the appointment may be required).
7. Observance of religious holidays consistent with the child’s truly held religious beliefs.
8. College or university visits (at the discretion of the Principal or his/her designee, verification of the date and time of the visit may be requested).
9. Absence due to a placement in or changes to a foster care placement or any court proceeding related to a student’s foster care status.
10. Absences due to a student being homeless.
11. The existence of an emergency condition at home such as absence, illness, or death of the parent.
12. Necessary work in a family business or on a family farm (after proof of necessary absence is provided to the Principal or his/her designee.
13. Necessary work directly and exclusively for a child’s parent, if the child is over the age of fourteen (14) and has been in regular attendance at school during the current school year (after proof of necessary absence is provided to the Principal or his/her designee).
14. Instruction at home from a person qualified to teach the branches of education in which instruction is required, and such additional branches, as the advancement and needs of the child may require (after adequate certification of home instruction has been provided to the Principal or his/her designee).
15. An emergency or set of circumstances which in the judgment of the School constitutes a good and sufficient cause for absence.
16. If a student is absent from School for the sole purpose of traveling out of state to participate in a School-approved enrichment activity or extracurricular activity, the School shall count that absence as an excused absence, up to a maximum of twenty-four (24) hours per school year that the School is open for instruction. The student must complete any classroom assignments he/she misses due to the absence. If the student will be absent for twenty-four (24) or more consecutive hours that the School is open for instruction, a classroom teacher must accompany the student during the travel period to provide the student with instructional assistance in order to count the student as in attendance.

The Principal or his/her designee reserves the right to verify statements and to investigate the cause of absence.

Excuses from future school attendance:

1. Shall be limited to a period not to exceed thirty (30) school hours and can be renewed at the discretion of the Superintendent or his/her designee for thirty (30) additional hours. Absences shall not exceed sixty (60) consecutive hours unless the child’s parent has recently died or become totally or partially incapacitated and there is no older sibling living in the home who is out of school. At the discretion of the Superintendent or his/her designee, a written statement from a physician may be required.

2. May not materially endanger the child’s educational welfare and scholastic advancement.

Withdrawal

A student who fails to participate in seventy-two (72) consecutive hours of learning opportunities will be automatically withdrawn, unless the student’s absence is excused. Otherwise, a parent may withdraw a student voluntarily by signing a Voluntary Withdrawal form with the Principal or his/her designee.

Whenever a student withdraws from the School voluntarily, the Student’s teacher shall attempt to ascertain the reason for withdrawal and shall immediately inform the Superintendent or his/her designee of the reason for the withdrawal. If the Student voluntarily withdrew from the School as a result of a change in residence, the Superintendent or his/her designee shall notify the superintendent of the district to which the Student has moved of all essential information regarding the Student, including the Student’s new address.

If the Superintendent or his/her designee becomes aware that a Student who has withdrawn from the School for reasons other than a change of residence is not enrolled in another school, the Superintendent or his/her designee shall notify the registrar of motor vehicles and the juvenile judge of the county in which the School is located of the Student’s likely violation of the State’s compulsory education laws. Notice shall be given within two (2) weeks and shall include the Student’s name, address, date of birth, School, and the district where the Student resides. Any notice given in error shall be immediately rescinded by the Superintendent or his/her designee.

Disciplinary Action for Unexcused Tardiness or Absence

Repeated unexcused absences/tardiness may be grounds for disciplinary action that will not include suspension or expulsion.

A student is tardy when a student is more than five (5) minutes late for School or for a class. If a student misses more than half a class, the student will be marked absent for the class. When tracking hours of missed instruction for excessive absence and truancy purposes, the School shall (select one):

 Track tardiness and early dismissals to the nearest hour of missed instruction for each instance of tardiness or early dismissal per day (e.g., if a student is thirty-five (35) minutes tardy to school and leaves school forty-five (45) minutes early, the student shall be counted as absent for two (2) hours of that day).

 Track tardiness and early dismissal times based on the precise amount of missed instruction, tracked to the nearest minute (e.g., if a student is thirty-five (35) minutes tardy to school and leaves school forty-five (45) minutes early, the student shall be counted as absent for eighty (80) minutes of that day).

 Track tardiness and early dismissals to the nearest minutes (not to exceed sixty (60) minutes) of missed instruction for each instance of tardiness or early dismissal per day.

Students shall not be considered absent for purposes of habitual truancy calculations while out of class for a legitimate reason, including but not limited to restroom breaks, visits to the nurses office, counselor meetings, or remediation sessions.

Any student who, due to a medically-documented physical or mental impairment, is absent for an extended period will not be disciplined. Such students may be entitled to receive an education tailored to their individual needs or abilities as provided for under federal and/or state law.

Truancy and Absence Intervention Strategies

The Principal or his/her designee may act as the School’s attendance officer or delegate that duty as permitted by law. The School’s attendance officer shall investigate possible School attendance violations, and is authorized under Ohio law, to serve warrants, to enter places where children of compulsory School age are employed, and to take such other actions as may be necessary to enforce the compulsory education laws.

A student is excessively absent from school if a student is absent from the School with or without legitimate nonmendical excuse for thirty-eight (38) or more hours in one (1) school month or sixty-five (65) or more hours in one (1) school year. Within seven (7) days of a student becoming excessively absent from School, the attendance officer shall notify the student’s parents of the student’s absences in writing.

A student is habitually truant if the student is absent without a legitimate excuse for thirty (30) or more consecutive hours, for forty-two (42) or more hours in one (1) school month, or seventy-two (72) or more hours in one (1) school year.

Legitimate excuses for the absence of a student otherwise habitually truant include but are not limited to:

1. the student was enrolled in another school;
2. the student’s absence was excused in accordance with applicable law or policy; or,
3. the student has received an age and schooling certificate.

If the student is habitually truant and the student’s parents have failed to cause the student’s attendance, the School will assign the student to an absence intervention team (“AIT”) within ten (10) days. The Principal or designee selects the AIT members, who shall include a representative of the School who knows the child and the child’s parent, guardian, custodian, guardian ad litem, or temporary custodian. Members may also include a school psychologist, counselor, social worker, or representative of a public or nonprofit agency designed to assist students and their families in reducing absences.

Within seven (7) days of the School’s determination that the student is a habitual truant, the School will make at least three (3) reasonable, meaningful attempts to secure the child’s parent, guardian, or custodian’s (for the purposes of this policy, “parent”) participation on the AIT. If the parent responds to attempts but is unable to attend, the School will notify the parent of the right to participate by designee. In the event the parent does not respond to the attempts at all, the School will investigate whether the failure to respond triggers child abuse and neglect reporting requirements and instruct the other members of the AIT to develop a plan for the child.

Within fourteen (14) days after its formation, the AIT will develop a written plan (“AIT plan”) to reduce or eliminate Student’s further absences. The AIT plan will state that a complaint will be filed in juvenile court alleging that the child is an unruly child not later than sixty-one (61) days after implementation if the child refuses to participate in or fails to make satisfactory progress on the plan or other alternatives to adjudication. The School will make reasonable attempts to provide student’s parent with written notice of the plan within seven (7) days of development.

If a student becomes habitually truant during the last twenty-two (22) school days of the year, the School may assign one official to work with the parent and develop an AIT plan in lieu of forming a full AIT. The plan shall be implemented not later than seven (7) days prior to the first day of instruction of the next school year.

AIT Exemption: The School shall be exempt from AIT procedural requirements if it has a chronic absenteeism rate of less than 5% of the student body per the last state report card.

The School shall employ absence intervention strategies for all students who are excessively absent from School. Such strategies shall include the following, if applicable:

1. Providing a truancy intervention plan for any student who is excessively absent from school;

2. Providing counseling for a habitual truant;

3. Requesting or requiring a parent to attend parental involvement programs;

4. Requesting or requiring a parent to attend truancy prevention mediation programs;

5. Notification of the registrar of motor vehicles of student’s truancy status if the student misses sixty consecutive hours of instruction or ninety hours of instruction during the course of the school year; and

6. Taking legal action under R.C. 2919.222, 3321.20, and/or 3321.38.

On the 61st day after the implementation of an AIT plan or other intervention strategy, the attendance officer shall file a complaint with the juvenile court against a student, if all of the following apply:

1. the student is a habitual truant;

2. the School has made meaningful attempts to re-engage the student through the AIT plan, other intervention strategies, and any other offered alternatives to adjudication; and

3. the student has refused to participate in or failed to make satisfactory progress on the AIT plan, as determined by the AIT, or any offered intervention strategies or alternatives to adjudication.

If the 61st day falls during the summer months, at the School’s discretion, the AIT or attendance officer may extend the implementation of the plan and delay filing the complaint for an additional thirty (30) days from the first day of instruction of the next school year.

If, however, at any time during the implementation phase of the AIT plan or other intervention strategy, the student is absent without legitimate excuse for thirty (30) or more consecutive hours or forty-two (42) or more hours in one school month, the attendance officer shall file a complaint with the juvenile court against the student, unless the AIT has determined that the student has made substantial progress on the absence intervention plan.

The Principal or his/her designee is also authorized to establish a parent education program for parents of students who are habitually truant. Any parent assigned to the program who does not complete the program is to be reported to law enforcement authorities for neglect of parent education, a fourth class misdemeanor if found guilty.

Reporting

The School shall report to the Ohio Department of Education, as soon as practicable, any of the following occurrences:

1. When a student is deemed habitually truant.

2. When a student is deemed excessively absent.

3. When a student has been adjudicated an unruly child for being a habitual truant and violates the court order regarding that adjudication.

4. When an AIT plan has been implemented for a student.

This Board consulted with the juvenile court of the counties in which the School is located, parents of students attending the School, and state and local agencies deemed appropriate by the Board prior to adopting this policy.

*R.C. 2151.011; R.C. 2151.27; R.C. 3314.03(A)(6); R.C. 3314.11; R.C. 3321.01; R.C. 3321.041; R.C. 3321.13-.191; O.A.C. 3301-69-02.*

**317 Educational Assistants/Paraprofessionals**

An educational assistant/paraprofessional is a nonteaching employee who directly assists a teacher by performing duties for which a teaching license is not required.

Educational assistants/paraprofessional applicants must submit the following documents:

1. Application for employment;
2. Written references and recommendations for employment;
3. Copy of a valid educational aide permit or paraprofessional license issued by the State Board of Education\*;
4. An application for the completion of a Bureau of Criminal Identification and Investigation and FBI criminal background check as required by Ohio law. New employees are employed on a conditional basis pending receipt of a satisfactory background check.

**Every employee must undergo a criminal background check upon application**. Certain convictions as outlined in Ohio Law, referred to as “absolute bar offenses,” will prohibit an individual from being employed in a public school. A listing of the disqualifying offenses may be obtained from the School’s office. Educational assistants must comply with all licensure/permit requirements established by the Ohio Department of Education.

In certain circumstances, an individual who would otherwise be disqualified may be hired if that individual’s offense has been rehabilitated. Rehabilitation is limited to certain offenses. A complete list of offenses that cannot be rehabilitated (“absolute bar offenses”) may be obtained from the School’s office. To be rehabilitated, (1) the offense cannot involve a victim who was a minor or a victim who was or is a student; (2) for a felony, at least five years have passed since the individual was fully discharged from imprisonment, probation, or parole or the individual has had his/her conviction sealed or expunged; (3) for a misdemeanor, at least five years have elapsed since the date of conviction or the individual has had the record of his/her conviction sealed or expunged; (4) the individual is not a “repeat offender” (has not been convicted of any of the offenses listed in R.C. 3319.39(B)(1) or R.C. 3319.31 two or more times in separate criminal actions); (5) upon request by the school, the individual has provided written confirmation of rehabilitation efforts, the results of those efforts, and whether the terms of his/her probation, parole, or deferred adjudication have been completed; and (6) as viewed by a reasonable person, the employment of the individual will not jeopardize the health, safety, or welfare of people served by the school. The School has discretion to decide whether the offense has been rehabilitated. Written confirmation required in item (5), above, will not be conclusive evidence that the applicant has met the other rehabilitation requirements required by the Board and by law.

An educational assistant/paraprofessional must be under the supervision and direction of an assigned teacher at all times in the performance of their duties, although such duties need not necessarily be performed in the physical presence of the teacher except as otherwise stated in this policy. An educational assistant/paraprofessional working for the School in a Title I supported program may be assigned to duties consistent with any of the following:

* providing one-on-one tutoring for eligible students during times when the teacher would not otherwise be instructing the student;
* assisting with classroom management, such as organizing instructional and other materials;
* providing assistance in a computer laboratory;
* providing support in a library or media center;
* conducting parental involvement activities;
* acting as a translator;
* providing instructional services to students, if working under the direct supervision of a teacher.

An educational assistant/paraprofessional will be considered to be working under the “direct supervision” of a teacher if:

* the teacher plans the instructional activities that the educational assistant/paraprofessional carries out;
* the teacher evaluates the achievement of the students with whom the educational assistant/paraprofessional is working; and
* the educational assistant/paraprofessional works in close and frequent physical proximity to the teacher.

Nonteaching employees whose functions are solely secretarial and clerical and who do not perform duties as educational assistants are not required to hold a license even though they work under the direction of a teacher.

Educational assistants/paraprofessionals are prohibited from divulging personal information concerning any pupil in the school which was obtained or obtainable while employed, except to the teacher to whom assigned, or the Principal in such teacher’s absence, or when required to testify in a legal proceeding.

\* Provided that the Superintendent believes an employee is qualified to obtain a valid permit or license and the employee has filed an application for such a permit or license with the State Board of Education, the School may allow an employee who does not currently hold a permit or license to work as a substitute for an educational assistant where that educational assistant is absent from work due to illness or emergency, or any other leave of absence. The employee must cease working as a substitute educational aide if he or she is denied a permit or license, or after sixty (60) days, whichever is earlier.

*R.C. 3319.088; R.C. 3319.291; R.C. 3319.39; R.C. 3319.391; O.A.C. 3301-20-01; 3301-24-05; 3301-*25.

**318 Other Employees**

Prior to employment, applicants for positions that do not require a license issued by the State Board of Education or that involve the operation of vehicles of public transportation must submit the following documents:

1. An application for employment;
2. Written references and recommendations for employment;
3. Copies of any specific license or certificate as may be required by law or by the Board or the School administration for the position sought;
4. An application for the completion of a Bureau of Criminal Identification and Investigation and FBI criminal background check as required by Ohio law. New employees are employed on a conditional basis pending receipt of a satisfactory background check.

Every employee must undergo a criminal background check at the time of application and then by the fifth of September every five years thereafter, unless the employee is a bus driver, in which case every six years thereafter. After the initial background checks, the employee will need to provide only an updated FBI criminal background check if the school previously requested a BCI criminal background check, and if he/she presents proof of having been an Ohio resident for the five-year period preceding September 5 of the applicable year. Certain convictions as outlined in Ohio Law will prohibit an individual from being employed in a public school. A listing of the disqualifying offenses may be obtained from the School's office.

In certain circumstances, an individual who would otherwise be disqualified may be hired or retained as an employee if that individual’s offense has been rehabilitated. Rehabilitation is limited to certain offenses; a complete list of offenses that cannot be rehabilitated may be obtained from the School’s office. To be rehabilitated, (1) the offense cannot involve a victim who was a minor or a victim who was or is a student; (2) the individual has provided written confirmation of rehabilitation efforts and the results of those efforts; and (3) as viewed by a reasonable person, the employment of the individual will not jeopardize the health, safety, or welfare of people served by the school. The School has discretion to decide whether the offense has been rehabilitated. To qualify as rehabilitated, bus drivers must also establish that (1) at least five years have passed since the individual was fully discharged from imprisonment, probation, or parole or since the individual entered a guilty plea, and (2) the individual has not pled guilty, been found guilty by a court, or been convicted of a rehabilitative offense two or more times in separate criminal actions. The School has discretion to decide whether the offense has been rehabilitated. If a person who is employed by a school or school transportation provider is arrested, summoned, or indicted for an alleged violation of a non-rehabilitative offense, the Principal or his/her designee or chief executive officer of the transportation provider shall suspend that person from all duties that require the care, custody, or control of a child during the pendency of the criminal action against the person.

Employees must possess both physical and mental health to be able to fulfill the duties of employment or the continuation of employment. Employees may be required to possess such other experience, training or special skills as may be required by the Board or the School administration for the position.

*R.C. 3319.291; R.C. 3319.39; R.C. 3327.10(J); R.C. 3319.391; O.A.C. 3301-20-03; O.A.C. 3301-20-03; O.A.C. 3301-83-23 (Bus Drivers).*

**Appendix 148.8-A**

**Methods of Procurement Using Federal Grant Funds**

In accordance with applicable federal law, the School shall use the following methods of procurement to expend federal funds:

1. Micro-Purchase: This method of procurement shall be appropriate for purchases where the aggregate dollar amount does not exceed $10,000.00, or such amount as may be set by the Federal Acquisition Regulation. When practicable, the School shall distribute micro-purchases equitably among qualified suppliers, including small businesses and minority and women owned enterprises.
2. Small Purchase: This method of procurement shall be appropriate for purchases in excess of $10,000.00, but less than the federal Simplified Acquisition Threshold, which currently is $250,000.00. When making small purchases, the School shall obtain price or rate quotes from an adequate number of sources.
3. Sealed Bids: This method of procurement shall be appropriate for purchases over the Simplified Acquisition Threshold, or $250,000.00, when: (1) a complete, adequate, and realistic specification or description of goods or services is available; (2) at least two responsible bidders are available and willing to compete for the business; (3) selection will be made principally on price; and (4) a firm fixed price contract will be awarded. The School shall award the fixed price (lump sum or unit price) to the responsible bidder who conformed to all material terms and is the lowest in price.
4. Competitive Proposals: This method of procurement shall be appropriate for purchases over the Simplified Acquisition Threshold, or $250,000.00, that require a formal solicitation and fixed-price or cost-reimbursement contracts. The School shall award contracts to a responsible vendor whose proposal is most advantageous to the School and is used when sealed bids are not appropriate, for reasons not limited to circumstances where the lowest price is not a sufficient deciding factor.
5. Noncompetitive Proposals or Sole Source Solicitations: This method of procurement is only appropriate under limited circumstances and shall be used by the School sparingly. Sole source solicitation may be appropriate when an item is available only from one source, when a public emergency does not allow for the time of the competitive proposal process, or when a number of attempts at a competitive bidding process fail.

**Appendix 204.16-A**

**Cyber Threat Incident Response Plan**

In the event of a cyber threat incident, the School shall comply with the following procedures:

1. Validate and Contain the Cyber Threat.
	1. When a cyber threat is identified, the individual who first becomes aware of the compromise (“Incident Reporter”) shall immediately notify the Principal or his or her designee. The Incident Reporter shall, to the greatest extent possible, provide the Principal or his or her designee with all relevant information and underlying suspicions, and if necessary, access to the device in which the cyber threat occurred.
	2. The Principal or his or her designee shall notify the members of the Incident Response Team (“IRT”), and the team shall meet as soon as possible to respond to the cyber threat. The IRT will determine if a data breach has occurred, and to the extent possible, determine the type of information that has been disclosed.
	3. The IRT must determine the immediate steps necessary to contain the threat. If necessary, the IRT shall contact an appropriate cyber security response provider to limit damage caused by the cyber threat.
	4. The IRT shall attempt to identify any protected or sensitive information that may have been compromised. If it is determined that the education records of any student has been compromised, the Principal or his or her designee shall document the disclosure in each respective student’s education file.
	5. The IRT shall document mitigating efforts for later analysis.
2. Notify Authorities and Affected Parties.
	1. The IRT shall determine if the incident warrants notification to law enforcement and/or the Family Policy Compliance Office.
	2. The Principal shall notify all parties whose sensitive information was determined to have been compromised if the compromised data included information that could lead to identity theft.
3. Collect and Review Cyber Threat Response Documentation.
	1. The IRT shall assess the cyber threat and determine steps necessary to minimize re-occurrence.
	2. This plan shall be modified as needed to address future cyber threats.

**Appendix 241.5-A**

**Residency Verification Procedures**

**Monthly Review**. On a monthly basis, the School will review the student residency records of all newly enrolled students, students whose addresses are known to have changed, and a random selection of \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (\_\_\_%) students enrolled in the School. The School will take the following steps to properly identify and report the district of residence for all enrolled students through EMIS:

* **New Student.** The School will review the completed enrollment information provided by the parent or student upon enrollment and require the submission of at least one (1) acceptable proof of residency. The student’s school district of residence that corresponds with the student’s proof of residency documentation will be reported via EMIS.
* **Student Whose Address Is Known To Have Changed.** The School requires that any parent or student who experiences a change in address to report the new address to the School immediately. New acceptable proof of residency that corroborates the new address and district of residence will be requested. The School will make a good faith effort to accurately identify the correct residence of the student, and will report all changes in residency in EMIS, If the School’s determination differs from a district’s determination, the School shall provide the school district with documentation of the student’s residency pursuant to the School’s policy.

**Random Review of Currently Enrolled Students.** The School will randomly select and review the completed enrollment information of \_\_\_\_\_\_\_\_\_\_\_\_\_\_ (\_\_\_%) currently enrolled students monthly to ensure that at least one (1) document of acceptable proof of residency has been presented to the School and make a good faith effort to accurately identify the correct residence of the student. The School shall request that parent’s either submit a signed verification of their current address or provide one (1) additional proof of residency record. If the parent’s or student’s primary address has changed or is determined to be inconsistent with the reported district of residency, the School shall verify new residency and update files as appropriate in EMIS. The School will not randomly verify the residency of the same student on more than one occasion during the school year unless the school has less than 60 students enrolled.

**Appendix 241.5-B**

**Monthly Residency Verification Report**

**Review Month:**

**Residency Flags Opened:**  **Flags Resolved:**

**Method of Verification:** Confirmed that residency documentation that followed the School’s policy was in the student’s file, and confirmed that the student’s school district of residence matches. Contacted parents as necessary.

**New Students**

**Number of New Enrollments:**

**Number of New Students with Incorrect Residency Information:**

**Date of Resolution:**

**Notes:**

**Student Whose Address Is Known To Have Changed**

**Number of Students:**

**Notes:**

**Random Review of Currently Enrolled Students**

**Student SSID:**   **Reviewer:**

**Review Date:**  **Notes:**

**Student SSID:**   **Reviewer:**

**Review Date:**   **Notes:**

**Student SSID:**   **Reviewer:**

**Review Date:**   **Notes:**

**Appendix 244-A**

  **(School Name)**

**Physical Education Waiver Form**

**Name of Student:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ **Anticipated Graduation Year:** \_\_\_\_\_\_\_\_\_\_\_

**I hereby declare my intent to utilize the Physical Education (“PE”) graduation requirement waiver.**

**Waiver requested due to participation in:**

1. At least two full seasons in (selection one):

\_\_\_\_\_ interscholastic athletics, \_\_\_\_\_ marching band, \_\_\_\_\_ show choir, \_\_\_\_\_ cheerleading

2. At least two full school years of:

\_\_\_\_\_ in the junior reserve officer training corps (“JROTC”).

One-half credit of other course work has been made up through the following courses\*:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\*if the student received course credit for participation in JROTC, no additional credit is needed to qualify for this waiver.

**By signing below, I understand that the PE requirement will be waived, contingent upon the student:**

1) **completing** two **full** seasons in interscholastic athletics, marching band, show choir or cheerleading **and** earning one-half credit in another course of study in lieu of PE coursework and credit; or

2) **completing two full years** in JROTC, **and** either (a) earning course credit for participation in JROTC, or (b) earning one-half credit in another course of study in lieu of PE coursework.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Parent/Guardian of Student Date**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Student Date**

- - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -- - - -- - - -- - -

**ADMIN USE ONLY**

**The above name student participated in the following activities to meet the PE waiver requirement:**

Activity 1: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ School Year \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Activity 2: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ School Year \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

½ Credit earned in the following course of study: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**I hereby recommend the above named student for a PE waiver based upon satisfaction of all requirements.**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**School Administrator Date**

If Student’s PE waiver has been denied, please specify reason: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Appendix 244-C**

**Community Service Seal**

Students who perform a high-quality community service experience project may earn a Community Service Seal (“Seal”) printed on the student’s high school transcript and/or diploma.

Students may begin earning the Seal during the ninth (9th) grade and use experiences they had at any point during their time in high school. All projects must be validated by documented hours, with supporting documentation, and supervisor verification and evaluation by a supervisor who worked with and supervised the student perform the community service.

The Principal or his/her designee shall be responsible for implementing the process to earn a Seal.

High-quality community service experiences will:

* Lead students to reflect on and address the needs of the communities in which they live and work;
* Promote meaningful community connections and a clearer understanding of the organizations and agencies that support community needs;
* Allow students to apply knowledge and skills in practical settings;
* Give students opportunities to gain new knowledge, skills and understanding that can support their future pursuits and successes;
* Connect students to the careers and professions available in the public, nonprofit and philanthropic sectors;
* Offer opportunities for students to show attributes such as foundational knowledge, social and emotional skills, and leadership and reasoning abilities that demonstrate their readiness to transition to an identified next step after high school; and
* Promote a better understanding of the importance and value of civic engagement, individual or group contributions and volunteerism in a local community.

**Appendix 244-D**

**Fine and Performing Arts Seal**

Students who demonstrate above average skills in the fine or performing arts according to an evaluation by the School may earn a Fine or Performing Arts Seal (“Seal”) printed on the student’s high school transcript and/or diploma. Above average skill levels may entail any of the following:

* Earning a grade of “B” or higher in three (3) or more fine art or performing art classes;
* Participation in at least two (2) theater productions;
* Participation in at least two (2) seasons of any performing arts group (e.g., marching band, jazz band, dance troupe);
* Participation in at least two (2) seasons of any fine arts or performing arts activity;
* A recommendation for the seal from a teaching, director, conductor, or faculty advisor based on the student’s above average skill level in any fine art or performing art activity.

Students may begin earning the Seal during the ninth (9th) grade and use experiences they had at any point during their time in high school.

The Principal or his/her designee shall be responsible for implementing the process to earn a Seal.

**Appendix 244-E**

**Student Engagement Seal**

Students who participate in extracurricular activities such as athletics, clubs, or student government to a meaningful extent may earn a Student Engagement Seal (“Seal”) printed on the student’s high school transcript and/or diploma. Meaningful participation may entail any of the following:

* Participation in an extracurricular activity for four (4) year;
* Serving as the captain of an extracurricular team;
* Election as the president of an extracurricular club or body of student government; or
* A recommendation for the seal from a coach or faculty advisor based on the student’s extensive, demonstrated commitment to the School.

Students may begin earning the Seal during the ninth (9th) grade and use participation in extracurricular activities at any point during their time in high school. Participation in qualifying activities must be validated by documented hours, with supporting documentation, and coach/faculty advisor verification with personal knowledge of the student’s engagement.

The Principal or his/her designee shall be responsible for implementing the process to earn a Seal.

**Appendix 246-A**

**What It Takes to Earn an Ohio High School Diploma**

Students must meet both curriculum and graduation testing requirements in order to earn an Ohio high school diploma. See the curriculum and graduation testing checklists below as well as information about alternatives to the Ohio core curriculum and mandatory testing requirements.

1. **Curriculum Requirements for Students Who Entered Ninth Grade before July 1, 2010.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Curriculum Requirements** | **State Minimum** | **Additional Local Credits** | **Credits Earned to Date** | **Credits Remaining** | **Honors Diploma Credits** |
| English Language Arts | 4 units | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Health | ½ unit | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Mathematics | 3 units | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Physical Education | ½ unit | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Science | 3 units\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| History & Gov.  | 1 unit\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Social Studies | 2 units | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Electives | 6 units\*\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |

\* Science units must include 1 unit of biological sciences and 1 unit of physical sciences.

\*\* History and Government units must include a half unit of American history and a half unit of American Government.

\*\*\* Electives units must include 1 unit or 2 half units of Business/Technology, Fine Arts, or Foreign Language.If a school requires a foreign language as an additional graduation requirement, a student may apply one unit of instruction in computer coding to satisfy one unit of foreign language. If a student applies more than one computer coding course to satisfy the foreign language requirement, the courses shall be sequential and progressively more difficult.

1. **Curriculum Requirements for Students Entering Ninth Grade for the First Time on or after July 1, 2010.**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Curriculum Requirements** | **State Minimum** | **Additional Local Credits** | **Credits Earned to Date** | **Credits Remaining** | **Honors Diploma Credits** |
| English Language Arts | 4 units | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Health | ½ unit\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Mathematics | 4 units\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Physical Education | ½ unit\*\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Science | 3 units \*\*\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| History & Gov.  | 1 unit\*\*\*\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Social Studies | 2 units \*\*\*\*\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |
| Electives | 5 units\*\*\*\*\*\*\* | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ | \_\_\_\_\_\_\_\_\_ |

\* The half Health unit shall include instruction in nutrition and the benefits of nutritious foods and physical activity for overall health.

\*\* Math units shall include 1 unit of algebra II or the equivalent of algebra II, or, 1 unit of advanced computer science+ after signing and submitting a letter of understanding of the impact of such a course selection on college admissions. However, students who enter ninth grade for the first time on or after July 1, 2015, and who are pursuing a career-technical instructional track shall not be required to take algebra II or advanced computer science and instead may complete a career-based pathway mathematics course as an alternative.

\*\*\* For those schools that have adopted a physical education waiver policy, Any student who, during high school, has participated in interscholastic athletics, marching band, show choir, or cheerleading for at least two (2) full seasons, or has participated in the junior reserve officer training corps (JROTC) for at least two (2) full school years, shall not be required to complete any physical education course as a condition to graduate. In lieu of a physical education course, the student shall be required to complete one-half (1/2) unit, consisting of at least sixty (60) hours of instruction, in another course of study. Credit received for participation in the JROTC may be used to satisfy the requirement to complete one-half (1/2) unit in another course of study.

\*\*\*\* Science units shall include inquiry based laboratory experiences, and shall include 1 unit of physical science, 1 unit of life science, 1 unit of advance study in one or more of the following sciences: chemistry, physics, or physical science; advanced biology or other life science; astronomy, physical geology, or other earth or space science; or computer science+. No student shall substitute a computer science course for a life science or biology course.

\*\*\*\*\* The 1 History unit shall include a half unit of American History and a half unit of American Government. For students who enter ninth grade for the first time on or after July 1, 2012, these half units shall include the study of: the Declaration of Independence; the Northwest Ordinance; the Constitution of the United States with an emphasis on the Bill of Rights; and the Ohio Constitution. Study of American History and American Government shall include the historical evidence of the role of documents such as the Federalist Papers and the Anti-Federalist Papers to establish the historical background leading to the establishment of the provisions of the Constitution and the Bill of Rights.

\*\*\*\*\*\* The School shall integrate the study of economics, financial literacy, and entrepreneurship into one or more existing social studies credits or into the contents of another class so that every high school student receives instruction in these concepts. Beginning with students who enter ninth grade for the first time on or after July 1, 2017, the 2 Social Studies units shall include at least a half unit of instruction in the study of world history and civilizations.

\*\*\*\*\*\*\*Elective units may consist of the combination of foreign language, fine arts, business, career-technical education, family and consumer sciences, technology, which may include computer science+, agricultural education, a junior reserve officer training corps program, or English language arts, mathematics, science, or social studies courses not otherwise required. Each student must complete two semesters or the equivalent of fine arts to graduate from high school. This coursework may be completed in grades 7 through 12; however, if completed in grade 7 or 8, the course must be taught by a person with a valid high school teaching license, and the course has been designated by the Board as meeting the high school curriculum requirements.

+ If a student applies more than one computer science course to satisfy curriculum requirements, the courses shall be sequential and progressively more difficult or cover different subject matter within the area of computer science.

A student who enters ninth grade on or after July 1, 2010, and before July 1, 2016, may qualify for graduation even though the student has not completed the Ohio core curriculum if:

1. During the student’s third year of high school both the student and parent sign and file with the School a written statement asserting consent to the student graduating without completing the Ohio core curriculum and acknowledgment that a consequence of not completing the Ohio core curriculum is ineligibility to enroll in most Ohio state universities without additional coursework;
2. The student and parent fulfill any additional procedural requirements mandated by the School to ensure informed consent has been given;
3. The student, parent, and a representative of the School jointly develop a student success plan for the student that specifies the student matriculating to a two-year degree program, acquiring a business and industry- recognized credential, or entering an apprenticeship;
4. The student receives counseling and support from the School relating to the student success plan during the remainder of the student’s high school experience; and
5. The student successfully completes the curriculum requirements listed above for students entering the ninth grade for the first time before July 1, 2010, or if the student entered ninth grade for the first time on or after July 1, 2014, the student must successfully complete the curriculum requirements listed above for students entering the ninth grade for the first time before July 1, 2010 allowing for the following modifications:
	1. 4 units of Mathematics, with one unit on probability and statistics, computer programing, applied mathematics or quantitative reasoning, or any other course approved by ODE for such purposes;
	2. 5 elective units;
	3. 3 units of Science, with one unit of biological sciences and one unit of physical science, which shall include inquiry based laboratory experiences.
6. **Graduation Tests Requirements.**

For Students Who Need to Pass the Ohio Graduation Tests (OGT):

1. Notify student and parents about:
	* Importance of earning a diploma
	* Need to meet both testing and curriculum requirements to earn a diploma
	* Any additional local graduation requirements
	* District’s policy about participation in commencement ceremony
2. How to access information (test blueprints, previous tests) on the web about OGT:
* http://www.ode.state.oh.us and enter *OGT* in the search box
1. OGT test administrations before graduation:
	* + - Spring of 10th grade
			- Summer between 10th and 11th grade (optional)
			- Fall and spring of 11th grade
			- Summer between 11th and 12th grade (optional)
			- Fall and spring of 12th grade

D) How to access previous graduation tests:

* + - * *OGT Reading and Mathematics*
* http://www.ode.state.oh.us and enter *previous OGT tests* in the search box

For Students Required to Pass End-of-Course Exams Who Entered Ninth Grade for the First Time Prior to July 1, 2019:

A) Students must take seven end-of-course State Tests

B) For each of the seven end-of-course tests, a student must earn a minimum of 18 out of a maximum total of 35 possible points towards graduation overall from all tests. Students are scored between one and five points per test.

Students taking Advanced Placement or International Baccalaureate courses in American history or American government may take tests specially designed for these courses instead of the state end-of-course test to avoid double testing. Similarly, students taking College Credit Plus courses in these subjects will use their course grade, not end-of-course test points, to determine their points earned towards graduation.

For Students Required to Pass End-of-Course Exams Who Entered Ninth Grade for the First Time on or after July 1, 2019:

A) Students must take five end-of-course State Tests (or six if required by the Ohio Department of Education).

B) Only passage of the end-of-course tests for English language arts II and Algebra I shall be required for graduation. The school shall offer remedial support to any student who fails to attain a competency score on one or both of the Algebra I and English language arts II end-of-course examinations. Following the first administration of the exam, if a student fails to attain a competency score on one or both of the Algebra I and English language arts II end-of-course examinations that student must retake the respective examination at least once.

1. **Alternative Way to Meet the Testing Requirements.**

For Students Who Need to Pass the Ohio Graduation Tests (OGT): A student may meet the testing requirements for passing all five Ohio Graduation Tests if he/she meets ALL of the following criteria:

* Passes 4 of the 5 tests and has missed passing the 5th test by no more than 10 points;
* Has a 97% attendance rate, excluding any excuses absences, through all four years of high school and must not have had an expulsion in high school;
* Has at least a grade point average of 2.5 out of 4.0 in the courses of the subject area not yet passed;
* Has completed the high school curriculum requirements;
* Has participated in any intervention programs offered by the school and must have had a 97% attendance rate in any programs offered outside the normal school day; and

Has letters recommending graduation from the high school principal and from each high school teacher in the subject area not yet passed.

For Students Required to Pass End-of-Course Exams Who Entered Ninth Grade for the First Time Prior to July 1, 2019: A student shall satisfy at least one of the following conditions in order to qualify for a high school diploma:

* Earn a remediation-free score in English, mathematics, and reading on the ACT or SAT;
* Attain a score that demonstrates workforce readiness and employability WorkKeys assessment;
* Satisfy all diploma conditions required for students entering ninth grade for the first time on or after July 1, 2019.

For Students Required to Pass End-of-Course Exams Who Entered Ninth Grade for the First Time Prior to July 1, 2019: A student shall satisfy at least one of the following conditions in order to qualify for a high school diploma:

* Demonstrate competency in the failed subject area (ELA II or Algebra I) through one of the following options:
1. Earn course credit in the failed subject area through the College Credit Plus program;
2. Complete two of the following options, one of which must be foundational:
3. Foundational options to demonstrate competency:
* Earn a score of proficient or higher on three or more state technical assessments in a single career pathway;
* Obtain an industry-recognized credential;
* Complete a pre-apprenticeship or apprenticeship in the student’s chosen career field; or
* Provide evidence of acceptance into an apprenticeship program after high school that is restricted to participants eighteen years of age or older;
1. Supporting options to demonstrate competency:
* Complete two hundred fifty hours of a work-based learning experience with evidence of positive evaluations;
* Obtain an OhioMeansJobs-readiness seal; or
* Attain a workforce readiness score, as determined by the department of education, on the nationally recognized job skills assessment selected by the state board.
1. Provide evidence that the student has enlisted in a branch of the armed services of the United States.

For any students receiving special education and related services, the individualized education program developed for the student under that chapter shall specify the manner in which the student will participate in the assessments administered above.

**V. Diploma Seal Requirements for Students Entering Ninth Grade for the First Time on or after July 1, 2019.**

Earn at least two of the state diploma seals, at least one (1) of which shall be a State-designed seal:

1. State-designed Seal:
	1. Biliteracy seal;
	2. OhioMeansJobs-readiness seal;
	3. One of the following seals:
* An industry-recognized credential seal;
* A college-ready seal;
* A military enlistment seal;
* A citizenship seal;
* A science seal.
* An honors diploma seal; or
* A technology seal.

b. Local-designed Seal:

1. A community service seal;
2. A student engagement seal; or
3. Fine and performing arts seal.

**Appendix 248-A**

**Graduation Plan Invitation Letter to Parent**

Dear Parent:

Pursuant to R.C. 3313.617, you are invited to participate in the development of a graduation plan for your child to assist your child to succeed in graduating from high school with a diploma.

The School will begin developing your child’s Graduation Plan at (time) on (date) at (location). Your participation is encouraged, but not required to develop a Graduation Plan for your child.

Graduating and earning a high school diploma is important to your child’s future. Please know that the School hopes for the success of each of its students throughout the process of earning a diploma. Should you have any additional questions or concerns, please do not hesitate to contact me.

Sincerely,

[insert Principal’s name]

Principal of «Name of school TE»

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PLEASE CHECK ONE:

 I **WILL** attend the meeting to discuss the development of my child’s Graduation Plan.

 I **WILL** **NOT** attend the meeting to discuss the development of my child’s Graduation Plan.

If you are unable to attend the meeting due to a scheduling conflict, please contact the Principal to determine if an alternative date may be available.

**Please return the following information to your child’s school. Failure to return this information to the School will be deemed intent not to participate.**

**Appendix 248-B**

**Parental Notification That Student is At-Risk of Not Graduating**

Dear Parent:

Pursuant to R.C. 3313.617, this letter is to notify you that (name) has been identified as at-risk of not qualifying for a high school diploma.

Consistent with the law and Board Policy, your child is required to successfully complete the curriculum and graduation requirements stated in the attached document in order to earn a high school diploma. The School has numerous resources available to assist your child in progressing towards these requirements, including offering additional instructional and support services as needed.

Graduating and earning a high school diploma is important to your child’s future. Please know that the School hopes for the success of each of its students throughout the process of earning a diploma. Should you have any additional questions or concerns, please do not hesitate to contact me.

Sincerely,

[insert Principal’s name]

Principal of «Name of school TE»

**Appendix 248-C**

**Graduation Plan**

**Curriculum Requirements:**

* **English language arts Courses:**

 **Credits Earned:** **Credits Needed:**

* **Mathematics Courses:**

 **Credits Earned:** **Credits Needed:**

* **Science Courses:**

 **Credits Earned:**  **Credits Needed:**

* **Social studies Courses:**

 **Credits Earned:** **Credits Needed:**

* **Health and Physical Education Courses:**

 **Credits Earned:** **Credits Needed:**

* **Elective Courses:**

 **Credits Earned:** **Credits Needed:**

**End-of-Course Exam Passed:**

**End-of-Course Exams Still Needed:**

**Diploma Seals Earned or Anticipated:**

**Alternative Pathway to Graduation:**

**Appendix 415-B**

**Animal Request and Verification Form**

**Requester Information:**

**Date of Request:**

**Requester Name:**

**Requester Relationship to Animal:**

**Animal Name (if any):**

**Animal Registration Number (if any):**

**Registration Entity (if applicable):**

**\*\**Note that a copy of all registration materials, vaccination records, and proof of insurance may be required prior to allowing the animal on School property\*\****

**Requester Certification:** I, (insert name), affirm the following to be true and accurate:

1. I am the owner of the Animal as indicated on the Animal’s identification tag, and have owned the animal for at least two months;
2. I am responsible or have made arrangements for the humane care of the Animal, including when school is not in session;
3. The Animal is not venomous or vicious, is up-to-date on all vaccinations and shots, and has no history of biting;
4. The Animal is spayed or neutered, reasonably cleaned and groomed, and free from all parasites;
5. The Animal is reasonably trained to follow basic requests, and will remain leashed or caged in common areas of the School; and
6. I assume all responsibility, and will indemnify, defend, and hold harmless the School, its Directors, officers, and employees, for any personal or property damage or losses or injuries caused by the Animal, and I am reasonably insured to do so.

**Signature of Requester:**   **Date:**

**Principal Determination**

The Animal referenced herein (check one): will be will ***not*** be permitted on School property.

The Principal deserves the right to revoke this authorization at any time for any reason.