

AGENDA ITEM EXECUTIVE SUMMARY: Compliance Matters—Victory High School, Inc.

Issue

Pursuant to Arizona Revised Statute (“A.R.S.”) § 15-183(R) and Arizona Administrative Code (“A.A.C.”) R7-5-403(F), if the Board determines a charter holder does not meet the Board’s minimum operational performance expectations, it shall consider the charter holder’s noncompliance and may subject the charter holder to additional charter oversight as outlined in Article 6 of the A.A.C, including issuing a notice of intent to revoke the charter contract. Pursuant to this rule, Victory High School, Inc. (“Charter Holder”) has been placed on the agenda for the Board’s consideration.

The Charter Holder failed to meet the minimum operational performance expectations set forth in A.A.C. R7-5-403 and the Board’s Operational Performance Framework when the Charter Holder received an overall rating for fiscal year 2019 of “Does Not Meet the Board’s Operational Performance Standard” due to six of the nine Operational Performance Framework measures being rated “Does Not Meet Standard.”

Policy Background—Operational Performance Framework

The Board shall annually assign a charter holder an overall operational performance rating based on measures specified in the Operational Performance Framework, which reflect the degree to which the charter holder achieved the minimum operational performance expectations. A.A.C. R7-5-403(B). The Board shall determine a charter holder meets the minimum operational performance standard if the charter holder receives no measure rated “Falls Far Below Standard” and no more than five measures rated “Does Not Meet Standard” for the evaluated year. A.A.C. R7-5-403(C).

Charter Holder Background

The Charter Holder was granted a 20-year renewal charter in 2010. The Charter Holder operates one school, Victory High School – West Campus (the “School”), serving grades 9-12 in Phoenix.

For FY 2020, the Charter Holder is reporting an estimated count of 23 students as of August 14, 2019. For additional information on the Charter Holder, see *Appendix A: Charter Holder Profile*.

Board staff conducted an unscheduled site visit to the School on March 27, 2019. At the visit, Board staff identified multiple compliance issues leading to marking the Charter Holder’s operational dashboard and requiring submissions to bring the Charter Holder into compliance. Several of the issues were related to the School’s current program of instruction, enrollment policies, appropriate fingerprinting requirements for its staff, required teacher salary posting, insufficient governing board minutes, availability of the instructional staff’s education background and work experience and the charter’s noncompliance with responding timely to these issues. See *Appendix B: Onsite Visit Final Report* for more detail.

Outside of the issues identified during the school site visit, the Charter Holder was also out of compliance due to issues identified in the Charter Holder’s FY 2018 audit. Additionally, the Charter Holder signed an F School Consent Agreement in FY 2019 due to receiving an “F” letter grade.

During the school site visit, Board staff met with Dr. Shirley Branham, the School’s principal, charter representative and corporate and school governing board member, and Jacque Jackson, assistant principal and corporate and school governing board member.

See *Appendix C: Communication Timeline* for detailed information about Board contact with the Charter Holder.



Summary of the Operational Performance Measures Recorded in FY 2019

Measure	Identified at	Original Notification Date	Original Due Date	Status
1.a. Educational Program – Essential Terms	Unscheduled Site Visit (“USV”)	4-26-19	5-27-19	Submitted July 29, 2019
2.b. Estimated Count/Attendance Reporting	Audit	1-24-19	2-7-19	Submitted by due date
2.b. Enrollment Processes	USV	4-26-19	5-27-19	Submitted by June 19, 2019
2.c. Fingerprinting	<ul style="list-style-type: none"> • Audit • USV 	<ul style="list-style-type: none"> • 1-24-19 • 4-26-19 	<ul style="list-style-type: none"> • 2-7-19 • 5-27-19 	<ul style="list-style-type: none"> • Submitted by due date • Submitted June 27, 2019
2.d. Teacher Resumes	USV	4-26-19	5-27-19	Submitted by due date
2.d. Open Meeting Law	Failing School	3-6-19	4-7-19	F School Consent Agreement executed March 19, 2019
2.d. Board Alignment	Failing School	3-6-19	4-7-19	F School Consent Agreement executed March 19, 2019
2.e. Timely Submissions	USV	4-26-19	5-27-19	Submitted by July 29, 2019
2.e. Favorable Board Actions	Board	12-5-18	12-21-18	F School Consent Agreement executed March 19, 2019
3. Other Obligations	USV	4-26-19	5-27-19	Teacher Salary Posting submitted by due date

1.a. Educational Program—Program of Instruction

A.A.C. R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract.

During the school site visit, and during the process of reviewing materials submitted after the school site visit, Board staff observed a blended learning approach in the classrooms visited. The Charter Holder’s contract does not provide for a blended program of instruction. The presentation of the School’s program of instruction provided by the charter representative at the site visit did not align with the Charter Holder’s program of instruction in the charter contract. Consequently, the Charter Holder is required to update the program of instruction through the Board’s amendment process.

The Charter Holder’s failure to ensure the charter’s program of instruction is delivered in accordance with the charter contract resulted in a rating of “Does Not Meet Standard” for the Operational Performance Framework measure that determines whether a charter holder’s educational program and operations reflect the essential terms of the educational program as described in the charter contract.

Board staff sent two notifications to which the Charter Holder did not submit a program of instruction amendment request to update the charter contract. Instead, the Charter Holder submitted an explanation that described the change in the program of instruction for the School.

On June 24, 2019, a last notification was sent to the Charter Holder requesting the submission of a program of instruction amendment to support the School’s current program of instruction. On July 29, 2019, the Charter Holder submitted a program of instruction amendment request that has been approved.



2.b. Audit Corrective Action Plan (“CAP”)

A.R.S. § 15-901 specifies school requirements for reporting student membership and absences to the Arizona Department of Education (“ADE”). A.R.S. § 15-914(G) requires “[e]very charter school and school district audit to include a systematic review of average daily membership . . . using a methodology that is consistent with guidelines established by the auditor general”. The “systematic review” is included in the Board’s Legal Compliance Questionnaire.

The Charter Holder’s FY 2018 Legal Compliance Questionnaire indicated, “The School did not provide information uploaded to ADE (AzEDS ADM15 report) to compare to the School’s computerized attendance system records.” As a result, the auditor was unable to determine the overall accuracy of the membership and absence data reported by the Charter Holder to ADE and used to determine the Charter Holder’s FY 2018 state equalization assistance.

The Charter Holder received a rating of “Does Not Meet Standard” for the operational performance framework measure that determines whether the charter holder is administering student admission and attendance appropriately.

In accordance with A.A.C. R7-5-504(G) and the Board’s Audit & Compliance Questionnaire Follow-up Matrix (“audit matrix”), staff notified the Charter Holder on January 24, 2019 that a CAP must be submitted. The audit CAP was timely completed on February 7, 2019.

2.b. Enrollment Processes

Charter holders in Arizona are required to comply with all applicable statutes and rules regarding enrollment practices that do not violate the rights of students. A.R.S. § 15-110; A.R.S. § 15-184.

During the school site visit, and during the process of reviewing materials submitted after the school site visit, a violation was identified regarding enrollment practices:

- A.R.S. §§ 15-872(E) and 15-873(A) detail the available options and timelines for families to submit immunization records or a waiver. The School’s enrollment packet did not indicate that families have the option to provide documentation other than a complete immunization record for enrollment. The packet required the immunization record to be submitted at the time of enrollment.
- A.R.S. § 15-184(A) requires a charter school to “enroll all eligible pupils who submit a timely application, unless the number of applications exceeds the capacity of a program, class, grade level or building.” Arizona law also places the responsibility of requesting a pupil’s record on the enrolling school and states that the request must be made directly to the previous school and within five days after enrollment. A.R.S. § 15-828(G). The School’s enrollment packet required documentation of previous transcripts at the time of enrollment.

The Charter Holder’s failure to comply with applicable statutes and rules regarding enrollment practices resulted in a rating of “Does Not Meet Standard” for the Operational Performance Framework measure that determines whether a charter holder appropriately administers student admission and attendance.

Subsequently, the Charter Holder submitted an updated enrollment packet which complied with all relevant Arizona Revised Statutes described above.

2.c. Fingerprinting

A.R.S. § 15-183(C)(5) requires “[a]ll persons engaged in instructional work directly as a classroom, laboratory or other teacher or indirectly as a supervisory teacher, speech therapist or principal to have a valid fingerprint clearance card” (“FCC”) issued by the Arizona Department of Public Safety (“DPS”). In separate instances, the Charter Holder has violated this statute.



The Charter Holder's FY 2018 audit indicated, "For one employee required to have a valid FCC, the School had a FCC that expired on May 14, 2018 on file as of the testing date of June 6, 2018." A.R.S. § 41-1758.08 authorizes the use of an expired FCC to satisfy the fingerprint requirements of A.R.S. §§ 15-183 and 15-512 with the appropriate affidavit signed by the holder of the expired FCC. The Charter Holder did not have the appropriate signed affidavits for the employee on file.

In accordance with A.A.C. R7-5-504(G) and the Board's audit matrix, staff notified the Charter Holder on January 24, 2019 that a CAP must be submitted. The audit CAP was timely completed on February 7, 2019.

The Charter Holder received a rating of "Does Not Meet Standard" for the operational performance framework measure that determines whether the charter holder is maintaining a safe environment consistent with state and local requirements.

During the March 27, 2019 school site visit, and during the process of reviewing materials submitted after the school site visit, School staff was unable to provide a valid FCC for the long-term volunteer that Board staff observed solely supervising a classroom of students working in the computer lab.

The Charter Holder's failure to comply with A.R.S. § 15-183(C)(5) resulted in a second mark under the Operational Performance Framework measure that determines compliance with maintaining a safe environment consistent with state and local requirements.

On June 24, 2019, a last notification was sent to the Charter Holder requiring a copy of the volunteer's FCC.

Subsequently, on June 25, 2019, the Charter Holder sent an email to Board staff stating that the long-term volunteer had made an appointment with a fingerprinting management service. However, the long-term volunteer had a family emergency and left town, and the Charter Holder has not been in contact with the volunteer since he left. The Charter Holder informed Board staff that the volunteer would no longer be working at the School.

2.d. Teacher Resumes

A.R.S. § 15-183(F) requires a charter school to keep in the personnel file of all current employees who provide instruction to students at the charter school information about the employee's educational and teaching background and experience in a particular academic content subject area.

During the school site visit, School staff was unable to provide the educational and teaching background and experience for twelve instructional staff members.

Due to its failure to comply with A.R.S. § 15-183(F), the Charter Holder was rated "Does Not Meet Standard" for the Operational Performance Framework measure that determines a charter holder is transparent in its operations.

Subsequently, the Charter Holder submitted the resumes for the instructional staff members in compliance with A.R.S. § 15-183(F).

2.d. Open Meeting Law

Charter school governing bodies are required to comply with A.R.S. §§ 38-431.01-09, Open Meeting Law.

A.R.S. § 38-431.01(B) requires that public meeting minutes include the following: date, time, and place of meeting; names of members of the public body present or absent; a general description of matters considered; an accurate description of all legal actions proposed, discussed, or taken; and the names of members who proposed each motion. The minutes shall also include the names of the persons, as given, making statements or representing material to the public body and a reference to the legal action about which they made statements or presented materials.



On November 6, 2018, the Charter Holder received a Failing School Notification letter indicating that the school operated by the Charter Holder was assigned an “F” letter grade for FY 2018. This notification outlined the requirements under A.A.C. R7-5-602(C), which included submitting to Board staff the minutes approving the signing of the consent agreement. During the process of reviewing the minutes, Board staff identified several violations of the Open Meeting Law in the December 14, 2018 governing board meeting minutes.

Due to its failure to comply with Open Meeting Law, as described above, the Charter Holder was rated “Does Not Meet Standard” for the Operational Performance Framework measure that determines a charter holder is transparent in its operations.

Subsequently, the Charter Holder submitted corrected board minutes which complied with Open Meeting Law as required.

2.d. Board Alignment

Pursuant to A.A.C. R7-5-505(C), Board staff may conduct a compliance check of a charter holder’s operational performance at any time. Compliance checks are conducted prior to a charter holder being considered by the Board. For the purpose of a compliance check, a charter holder is in compliance if any measure on its operational dashboard rated “Does Not Meet Standard” or “Falls Far Below Standard” in the current year and/or the prior fiscal year has been addressed, the charter holder is in “good standing” with the Arizona Corporation Commission (“ACC”), and the charter holder is maintaining alignment between the principals identified in the charter contract and with the ACC.

During the compliance check conducted, Board staff found that the Charter Holder’s board as reported through ASBCS Online and the board as listed with the ACC were not aligned.

Due to its failure to maintain alignment between the principals identified in the charter contract and with the ACC, the Charter Holder was rated “Does Not Meet Standard” for the Operational Performance Framework measure that determines a charter holder is transparent in its operations.

Subsequently, the Charter Holder filed the required documentation to align the corporate board members listed with ASBCS Online and the ACC.

2.e Timely Submissions—Site Visit Required Documentation

A.A.C. R7-5-505(F) and (G) require charter holders to demonstrate, by the specified date, compliance with all issues identified after a compliance check. The Charter Holder failed, on several occasions, to timely submit documentation required to demonstrate compliance with a number of operational issues.

The Charter Holder was notified on April 26, 2019 of its required submissions to demonstrate compliance following a site visit conducted March 27, 2019. The Charter Holder was given a deadline of May 27, 2019 to submit documentation of compliance. The Charter Holder did not submit all of the required documentation by the specified deadline.

The Charter Holder’s failure to timely submit resulted in a rating of “Does Not Meet Standard” for the Operational Performance Framework measure that determines whether a charter holder is complying with its obligations to the Board.

Subsequently, the Charter Holder was given a final deadline of June 19, 2019 to submit documentation. The Charter Holder did not submit all of the required documentation by the specified deadline. *See Appendix D: 30 Day Failure to Submit for more detail.*



The Charter Holder's failure to timely submit resulted in a second mark under the Operational Performance Framework measure that determines whether a charter holder is complying with its obligations to the Board.

On June 24, 2019, a last notification was sent to the Charter Holder outlining the remaining issues and the required documentation. *See Appendix E: 7 Day Failure to Submit for more detail.*

On July 29, 2019, the Charter Holder submitted documentation that demonstrated current compliance with issues identified at the site visit.

2.e. Favorable Board Actions—F-School Consent Agreement

Pursuant to A.R.S. § 15-241.02(I) and A.A.C. R7-5-602, when a charter school is assigned a letter grade of F, the Board is required to either take action to revoke the charter school's charter or restore the charter school to acceptable performance through a consent agreement.

On October 5, 2018, the Board was notified by ADE that the School was assigned a letter grade of "F" for FY 2018. At the November 13, 2018 Board meeting, the Board approved an updated consent agreement to accommodate schools assigned a letter grade of "F" in FY 2018. On March 19, 2019, the Board approved and executed the consent agreement with the Charter Holder.

The Charter Holder's failure to meet the Board's established academic performance expectations was rated "Does Not Meet Standard" for the Operational Performance Framework measure that determines a charter holder complies with its obligations to the Board.

3. Other Obligations—Teacher Salary Posting

Pursuant to A.R.S. § 15-189.05, each charter school is required to prominently post teacher salary information on its website homepage. During a review conducted before the school site visit, Board staff found that the Charter Holder's website did not have the required teacher salary posting.

The Charter Holder's failure to post the required teacher salary information on its website resulted in a rating of "Does Not Meet Standard" for the Operational Performance Framework measure that determines whether a charter holder is complying with other obligations.

Subsequently, the Charter Holder posted the required teacher salary information in compliance with A.R.S. § 15-189.05.



APPENDICES

- A. Charter Holder Profile
- B. Onsite Visit Final Report
- C. Communication Timeline
- D. 30 Day Failure to Submit
- E. 7 Day Failure to Submit

Appendix A: Charter Holder Profile

Governance

The Charter Holder's corporate board also serves as the School's governing body.

Corporate Board Members

Debra Murphy
Jacque Jackson
Shirley Marek-Branham

School Profile

School Name	Victory High School - West Campus		
Date Open	September 1996		
Location	Phoenix		
Grades Served	9-12		
FY 18 Letter Grade	F		
FY 18 Overall Rating	Falls Far Below Standard		
	FY 16	FY 17	FY 18
ELA AzMERIT (41% ⁺)	N/A	<2%	<2%
Math AzMERIT (41% ⁺)	N/A	<2%	4%
Science AIMS (52% ⁺)	N/A	N/A	N/A

⁺FY 18 State Average Passing

Additional School Choices Serving Grades 9-12 within 5 Miles of Victory High School - West Campus

Total Schools	FY 18 Letter Grade	Total Charter Schools	FY 18 State Assessment Data Greater than State Average			Subgroups within (±5%) of Charter Holder's Subgroup Data		
			ELA (>41%)	Math (>41%)	Science (>52%)	FRL (±5%)	ELL (±5%)	SPED (±5%)
3	A	1	1	3	2	*	*	*
4	B	4	3	2	2	*	*	*
3	C	1	0	1	2	*	*	*
3	D	2	0	0	0	*	*	*

**Because the percentage of ELL, FRL, and SPED students is not available for the Charter Holder, comparison to nearby schools is not possible.*

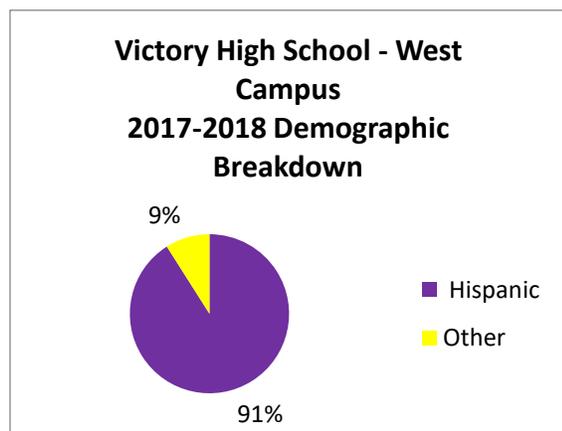
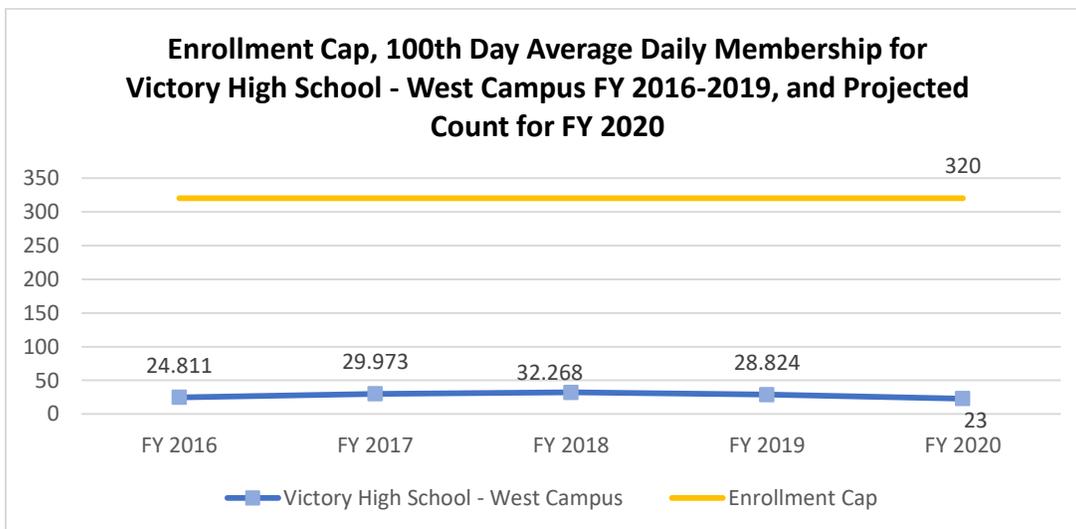
Comparison of Nearby Schools to Victory High School - West Campus

Total Schools	FY 18 Letter Grade	Total Charter Schools	FY 18 State Assessment Data Greater than Victory High School - West Campus		
			AzMERIT ELA (>2%)	AzMERIT Math (>4%)	AIMS Science
3	A	1	3	3	*
4	B	4	4	4	*
3	C	1	3	3	*
3	D	2	3	3	*
Total Number of Schools Performing Better than School Name (Percentage of Total)					
13		8 (62%)	13 (100%)	13 (100%)	N/A



Enrollment and Demographic Data

100th Day Average Daily Membership for FY 2016–FY 2019, and FY 2020 Estimated Counts ADM as of August 14, 2019.



2017-2018 Subgroup Data	
Free and Reduced Lunch	97%
English Language Learners	*
Special Education	*

**If the percentage of students is 0% or 100%, or the group includes less than 10 students, the percentage for that group is redacted.*



Academic Performance Dashboard

Victory High School - West Campus

	FY 2017		FY 2018	
	Traditional		Traditional	
	High School 9-12		High School 9-12	
	Measure	Rating	Measure	Rating
1a. A-F Letter Grade	NR	Not Rated	F	Falls Far Below
1b. School Improvement	No	Meets	Comprehensive	Falls Far Below
OVERALL RATING	Not Reported*		Falls Far Below Standard	

*An overall rating was not calculated because the school did not receive an A-F letter grade and was not identified for school improvement.

Financial Performance Dashboard

Financial Performance

Victory High School, Inc.

Interpreting the Financial Performance Dashboard

	Fiscal Year 2017		Fiscal Year 2018			
	Near-Term Measures					
Going Concern	No	Meets	No	Meets		
Unrestricted Days Liquidity <small><30, but ≥15: Does Not Meet <15: Falls Far Below</small>	235.15	Meets	302.57	Meets		
Default	No	Meets	No	Meets		
	Sustainability Measures*					
Net Income <small>≤0: Does Not Meet</small>	\$62,124	Meets	\$78,695	Meets		
Fixed Charge Coverage Ratio <small><1.10: Does Not Meet</small>	4.61	Meets	5.39	Meets		
Cash Flow (3-Year Cumulative) <small>Negative: Does Not Meet**</small>	\$125,211	Meets	\$109,868	Meets		
Cash Flow Detail by FY	FY 2017	FY 2016	FY 2015	FY 2018	FY 2017	FY 2016
	(\$10,794)	\$69,591	\$66,414	\$51,071	(\$10,794)	\$69,591

Meets Board's Financial Performance Expectations

* Negative numbers indicated by parentheses.
** Target effective beginning with FY16 audits.



Operational Performance Dashboard

Measure	2016	2017	2018	2019	2020
1.a. Does the delivery of the education program and operation reflect the essential terms of the educational program as described in the charter contract?	Meets	Meets	Meets	Does Not Meet	--
1.b. Does the charter holder adhere with applicable education requirements defined in state and federal law?	Meets	Meets	Meets	Meets	--
2.a. Do the charter holder's annual audit reporting packages reflect sound operations?	Meets	Meets	Meets	Meets	--
2.b. Is the charter holder administering student admission and attendance appropriately?	Meets	Meets	Meets	Does Not Meet	--
2.c. Is the charter holder maintaining a safe environment consistent with state and local requirements?	Meets	Does Not Meet	Meets	Does Not Meet	--
2.d. Is the charter holder transparent in its operations?	Does Not Meet	Meets	Meets	Does Not Meet	--
2.e. Is the charter holder complying with its obligations to the Board?	Meets	Meets	Meets	Does Not Meet	--
2.f. Is the charter holder complying with reporting requirements of other entities to which the charter holder is accountable?	Meets	Meets	Meets	Meets	--
3. Is the charter holder complying with all other obligations?	Meets	Meets	Meets	Does Not Meet	--
OVERALL RATING	Meets Operational Standard	Meets Operational Standard	Meets Operational Standard	Does Not Meet Operational Standard	--
BOARD EXPECTATIONS	--	Meets Operational Expectations	Meets Operational Expectations	Does Not Meet Operational Expectations	Does Not Meet Operational Expectations

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Operational Performance Dashboard (Expanded)

Measure	2016	2017	2018	2019	2020
1.a. Does the delivery of the education program and operation reflect the essential terms of the educational program as described in the charter contract?	Meets	Meets	Meets	Does Not Meet	--
Educational Program - Essential Terms	No issue identified	No issue identified	No issue identified	Program of Instruction* (more info)	--
1.b. Does the charter holder adhere with applicable education requirements defined in state and federal law?	Meets	Meets	Meets	Meets	--
Services to Student with Disabilities	No issue identified	No issue identified	No issue identified	No issue identified	--
Instructional Days/Hours	No issue identified	No issue identified	No issue identified	No issue identified	--
Data for Achievement Profile	No issue identified	No issue identified	No issue identified	No issue identified	--
Mandated Programming (State/Federal Grants)	No issue identified	No issue identified	No issue identified	No issue identified	--
2.a. Do the charter holder's annual audit reporting packages reflect sound operations?	Meets	Meets	Meets	Meets	--
Timely Submission	Yes	Yes	Yes	Yes	--
Audit Opinion	Unqualified	Unqualified	Unqualified	Unqualified	--
Completed 1st Time CAPs	No issue identified	No issue identified	No issue identified	No issue identified	--
Second-Time/Repeat CAP	No issue identified	No issue identified	No issue identified	No issue identified	--
Serious Impact Findings	No issue identified	No issue identified	No issue identified	No issue identified	--
Minimal Impact Findings (3+ Years)	No issue identified	No issue identified	No issue identified	No issue identified	--
2.b. Is the charter holder administering student admission and attendance appropriately?	Meets	Meets	Meets	Does Not Meet	--
Estimated Count/Attendance Reporting	No issue identified	No issue identified	No issue identified	Audit CAP* (more info)	--
Tuition and Fees	No issue identified	No issue identified	No issue identified	No issue identified	--
Public School Tax Credits	No issue identified	No issue identified	No issue identified	No issue identified	--
Attendance Records	No issue identified	No issue identified	No issue identified	No issue identified	--
Enrollment Processes	No issue identified	No issue identified	No issue identified	Enrollment Practices #1* (more info)	--
2.c. Is the charter holder maintaining a safe environment consistent with state and local requirements?	Meets	Does Not Meet	Meets	Does Not Meet	--
Facility/Insurance Documentation	No issue identified	No issue identified	No issue identified	No issue identified	--
Fingerprinting	No issue identified	Audit Finding - CAP Not Required (more info)	No issue identified	Audit CAP* Fingerprinting - Volunteer* (more info)	--
2.d. Is the charter holder transparent in its operations?	Does Not Meet	Meets	Meets	Does Not Meet	--

	Identified	Identified	Identified	Identified	
Teacher Resumes	No issue identified	No issue identified	No issue identified	Teacher Resumes (Site Visit)* (more info)	--
Open Meeting Law	Minutes (Contract Amendment) (more info)	No issue identified	No issue identified	Minutes (Contract Amendment)* (more info)	--
Board Alignment	Inconsistency in Reporting (more info)	No issue identified	No issue identified	Inconsistency in Reporting* (more info)	--
2.e. Is the charter holder complying with its obligations to the Board?	Meets	Meets	Meets	Does Not Meet	--
Timely Submissions	No issue identified	No issue identified	No issue identified	30-day Requirement Failure to Submit* 7-day Requirement Failure to Submit* (more info)	--
Limited Substantiated Complaints	No issue identified	No issue identified	No issue identified	No issue identified	--
Favorable Board Actions	No issue identified	No issue identified	No issue identified	Agreement to Restore Failing School* (more info)	--
2.f. Is the charter holder complying with reporting requirements of other entities to which the charter holder is accountable?	Meets	Meets	Meets	Meets	--
Arizona Corporation Commission	No issue identified	No issue identified	No issue identified	No issue identified	--
Arizona Department of Economic Security	No issue identified	No issue identified	No issue identified	No issue identified	--
Arizona Department of Education	No issue identified	No issue identified	No issue identified	No issue identified	--
Arizona Department of Revenue	No issue identified	No issue identified	No issue identified	No issue identified	--
Arizona State Retirement System	No issue identified	No issue identified	No issue identified	No issue identified	--
Equal Employment Opportunity Commission	No issue identified	No issue identified	No issue identified	No issue identified	--
Industrial Commission of Arizona	No issue identified	No issue identified	No issue identified	No issue identified	--
Internal Revenue Service	No issue identified	No issue identified	No issue identified	No issue identified	--
U.S. Department of Education	No issue identified	No issue identified	No issue identified	No issue identified	--
3. Is the charter holder complying with all other obligations?	Meets	Meets	Meets	Does Not Meet	--
Judgments/Court Orders	No issue identified	No issue identified	No issue identified	No issue identified	--
Other Obligations	No issue identified	No issue identified	No issue identified	A.R.S. §15-189.05 Teacher Salary* (more info)	--
OVERALL RATING	Meets Operational Standard	Meets Operational Standard	Meets Operational Standard	Does Not Meet Operational Standard	--
BOARD EXPECTATIONS	--	Meets Operational	Meets Operational	Does Not Meet Operational	Does Not Meet Operational
		Expectations	Expectations	Expectations	Expectations

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Appendix B: Site Visit Report

Onsite Visit Final Report

CHARTER INFORMATION

Charter Holder Name	Victory High School, Inc.	School Name	Victory High School – West Campus
Charter Holder Entity ID	4358	Site Visit Date	March 27, 2019
		Final Report Date	April 26, 2019

In accordance with A.R.S. §15-182(E)(1), the Arizona State Board for Charter Schools (“Board”) shall exercise general supervision over charter schools sponsored by the Board. On March 27, 2019, Board staff conducted an unannounced site visit to Victory High School – West Campus (“the School”). The unannounced site visit was prompted by information presented to the Board. During the site visit, Board staff met with Dr. Shirley Branham, Charter Representative and Principal, and Jacque Jackson, Assistant Principal and Board Member.

School Background

School Name	Month/ Year Open	Location	ADM*	Grade Levels Served
Victory High School	September/1996	Phoenix	28.82	9-12

*ADM as of 4/3/19

Contractual Compliance Review

Specific areas of the charter contract were reviewed to ensure the Charter Holder is in compliance. When Board staff identifies contractual or legal non-compliance issues at a site visit, each issue is reflected on the Charter Holder’s Operational Performance Dashboard. The table below identifies the contractual or legal compliance components that are out of compliance and specifies what the Charter Holder is required to submit by **May 27, 2019**.

A review of a charter holder’s contractual compliance may result in additional follow-up visits from Board staff.

Failure to provide required follow-up, as described below, by **May 27, 2019** will be recorded in Measure 2.e. of the Charter Holder’s operational performance dashboard.



Additionally, failure to submit timely may result in the remaining issues being placed on a subsequent Board meeting agenda for possible disciplinary action pursuant to R7-5-505(G), in which the Board may take action, including withholding up to ten percent of the monthly state aid apportionment, issuing a notice of intent to revoke the charter, or other remedial actions.

In accordance with R7-5-501(C), if the specified deadline has not passed, Board staff may grant a charter holder an extension to the specified deadline. In order to request an extension, please send an email to charterschoolboard@asbcs.az.gov.

Compliance Item	Findings	Required Submission
<p>Instructional Staff Education and Experience</p>	<p>Pursuant to A.R.S. §15-183(F), information about the teaching background and experience for the following instructional staff members was not available:</p> <ul style="list-style-type: none"> - Shirley Marek-Branham, Principal and Special Education Coordinator - Jacque Jackson, Assistant Principal and Curriculum Coordinator - Michael Faison, Social Studies teacher - Xiangji Zeng, Math teacher - Juan Marquez, contracted tutor - Leticia Barrett, contracted tutor - Rachel Phillips, contracted tutor - Kent Gompert, contracted tutor - Zach Baylor, contracted tutor - Andrea Buehrens, contracted tutor - Courtney Nelson, contracted tutor - Mr. Bloom, long-term volunteer <p>The School provided Board staff with forms for each teacher which included personally identifiable information, including social security numbers and payroll information. The forms did not include information</p>	<p>Provide the following:</p> <ul style="list-style-type: none"> - Copies of the teaching background and experience information for the instructional staff members that were not available for viewing on the day of the site visit.



	<p>regarding the staff member’s education or work experience.</p> <p>At the visit, school staff requested that Board staff provide an example how the information may be presented. See Appendix A for an example.</p>	
<p>Fingerprint Clearance Cards</p>	<p>A Fingerprint Clearance Card (“FCC”) for Mr. Bloom was not available pursuant to A.R.S. §15-183(C)(5) or §A.R.S. §15-512.</p> <p>Board staff observed Mr. Bloom supervising a classroom of students who were working on computers alone. School staff explained that Mr. Bloom is a long-term volunteer who would be in the classroom until the end of the year and had been volunteering at the school in the same capacity for several years prior. School staff was unable to produce the required FCC for Mr. Bloom, and Board staff informed them that Mr. Bloom would not be allowed to supervise and instruct students alone in a classroom without another staff member present who does possess a valid FCC. Ms. Jackson then joined Mr. Bloom in the classroom for the remainder of the day.</p>	<p>Provide the following:</p> <ul style="list-style-type: none"> - A copy of the fingerprint clearance card for Mr. Bloom. - A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> o The policy must address how the School will ensure compliance with volunteer teacher substitutes. - Confirmation that you have read A.R.S. §§15-512 and 15-183 (C)(5) and the Board’s guidance document in their entirety and understand what it means to be in compliance.
	<p>Recorded in Measure 2.c: Fingerprinting</p>	



<p>Open Meeting Law</p>	<p>Pursuant to A.R.S. §§38-431.01-09, the governing body meeting minutes were reviewed and the following are NOT in compliance with Open Meeting Law:</p> <p>October 15, 2018:</p> <ul style="list-style-type: none"> - Members absent not listed. 	<p>Provide the following:</p> <ul style="list-style-type: none"> - Documentation of compliance with A.R.S. §§38-431.01(B), (C), (D) and -431.03(B) that require public meeting minutes include: <ul style="list-style-type: none"> ✓ Date, time, and place of meeting. ✓ Names of members of the public body present or absent. ✓ A general description of matters considered. ✓ An accurate description of all legal actions proposed, discussed, or taken, including a record of how each member voted and the names of members who propose each motion. The minutes shall also include the names of the persons, as given, making statements or representing material to the public body and a reference to the legal action about which they made statements or presented materials.
<p>Enrollment and Attendance Policies</p>	<p>The following enrollment policies were reviewed and found NOT to be in compliance pursuant to Arizona Revised Statutes related to enrollment:</p> <p>The Enrollment Checklist includes “Immunization Record”</p> <ul style="list-style-type: none"> - Students can be enrolled without current or immediate proof of immunizations. A.R.S. §15-872(E) states, “...a pupil may be admitted to or allowed to attend a school if the pupil has received at least one dose of each of the required immunizations prescribed pursuant to A.R.S §36-672 and has established a schedule for the completion of required immunizations...” Homeless pupils have until the fifth calendar day after enrollment to provide proof of immunization. - Documentary proof is not required for a pupil to be admitted to school if one of the following occurs: <ol style="list-style-type: none"> 1. The parent or guardian of the pupil submits a signed statement to the school administrator stating that the parent or 	<p>Provide the following:</p> <ul style="list-style-type: none"> - An updated copy of the enrollment checklist - An updated copy of the enrollment brochure



guardian has received information about immunizations provided by the department of health services and understands the risks and benefits of immunizations and the potential risks of non-immunization and that due to personal beliefs, the parent or guardian does not consent to the immunization of the pupil.

2. The school administrator receives written certification that is signed by the parent or guardian and by a physician or a registered nurse practitioner that states that one or more of the required immunizations may be detrimental to the pupil's health and that indicates the specific nature and probable duration of the medical condition or circumstance that precludes immunization.

The Enrollment Checklist includes “Transcripts”

- The enrollment policy was found to be in conflict with A.R.S. § 15-184(A), which states, “A charter school shall enroll all eligible pupils who submit a timely application, unless the number of applications exceeds the capacity of a program, class, grade level or building.”
- Requiring documentation of previous academic performance cannot be a condition of enrollment.

The Victory Charter High School Brochure states “Requirements to Enroll into Victory High School: Complete Shot Record”

- See Enrollment Checklist – Immunization Record issue above.

The Victory Charter High School Brochure states “Requirements to Enroll into Victory High School: Transcript”

- See Enrollment Checklist – Transcript issue above.

	Recorded in Measure 2.b.: Enrollment Processes	
Program of Instruction	<p>Arizona Administrative Code R7-5-303 requires that all charters submit amendment requests to the Board through ASBCS Online when making changes to the charter contract.</p> <p>The Charter Holder’s program of instruction states, “To facilitate and enhance the instruction of these essential skills, along with electives and workplace skills, Victory is patterning its schedule in a large part after the Copernican Plan in its block scheduling, the three 60-day periods, and the small amount of students per class throughout the year.”</p> <p>At the site visit, Board staff observed a blended learning approach in the classrooms visited and the daily instructional schedule did not reflect block scheduling.</p> <p>As the program of instruction differs between what the School is currently implementing and what is described in the charter contract and the Charter Holder has not submitted an amendment to properly update the program of instruction, the Charter Holder is in violation of its contract.</p> <p>Recorded in Measure 1.a.: Program of Instruction</p>	<p>Provide the following:</p> <ul style="list-style-type: none"> - Submission of an administratively complete program of instruction amendment request to properly update the charter contract.
Teacher Salary Posting	<p>The School’s website was reviewed and found it NOT to be in compliance with A.R.S. §15-189.05.</p> <p>This statute requires each charter school to prominently post the following information on its website home page separately from its budget:</p> <ul style="list-style-type: none"> - The average salary of all teachers employed by the charter school for the current year. - The average salary of all teachers employed by the charter 	<p>Provide the following:</p> <ul style="list-style-type: none"> - A screenshot of or link to the updated website home page with the required teacher salary posting.



school for the previous year.

- The dollar increase in the average salary of all teachers employed by the charter school for the current year.
- The percentage increase in the average salary of all teachers employed by the charter school for the current year.

At the visit, school staff requested that Board staff provide an example of the teacher salary posting for them. The example is below:

AVERAGE TEACHER SALARY (A.R.S. §15-189.05), as added by Laws 2018, Ch. 285, §

1. Average salary of all teachers employed in budget year 2019	\$	32,364
2. Average salary of all teachers employed in prior year 2018	\$	30,247
3. Increase in average teacher salary from the prior year 2018	\$	2,117
4. Percentage increase		7.0%

Comments on Average Salary Calculation (Optional):

Teacher salaries excluding stipends/performance

Recorded in Measure 3: Other – Teacher Salary Posting

Appendix A:

Teacher Name

Teacher School Email Address

Teacher School Phone Number (if applicable)

Experience:

- **Teacher of record, XXX High School 2000-2010**
- **Special Education Coordinator, YYY High School, 2010-2015**

Education:

- **Bachelor of Arts in Education, The University of Arizona, 1998**
- **Master's in Education, Arizona State University, 2005**



Appendix C: Communication Timeline

March 27, 2019	Board staff conducted an unscheduled onsite visit to Victory High School. Board staff met with school leader and charter representative, Shirley Branham and office administrator, Jacque Jackson.
March 28, 2019	The Charter Holder submitted outstanding Fingerprint Clearance Card and Board membership documents that were discussed at the site visit.
April 26, 2019	Board staff emailed Dr. Branham notifying her that the Onsite Visit Final Report (“report”) was available on the ASBCS Online system. Board staff marked the Charter Holder’s dashboard for each non-compliance issue identified in the report. The Charter Holder was given a deadline of May 27, 2019 to submit the required documentation detailed in the report.
May 1, 2019	Dr. Branham and Ms. Jackson called Board staff for clarification on the submission requirement for the resumes of the tutors who were contracted through a company called 1 to 1 Tutoring. - Board staff provided clarification via email to the Charter Representative.
May 6, 2019	Neil Buchanan, an employee of 1 on 1 Tutoring emailed Board staff the required resumes for each of the contracted tutors.
May 17, 2019	Ms. Jackson emailed Board staff and asked us to confirm that we had received Mr. Buchanan’s email with the tutor information. • Staff responded to confirm receipt and stated that all submissions were under review.
May 22, 2019	The Charter Holder submitted the following documentation: teacher salary posting, enrollment flyer, meeting minutes, a Program of Instruction narrative, an explanation of a volunteer’s FCC status, and teacher resumes.
May 29, 2019	Board staff emailed Ms. Jackson to request a copy of the FCC application submitted by the volunteer.
June 6, 2019	Ms. Jackson emailed Board staff in response to the FCC request and stated, the volunteer “had a family emergency in California, and I am unable to get in touch with him. I will send application as soon as I can reach [him]. I hope this will not affect Victory adversely.”
June 7, 2019	Dr. Branham emailed Board staff a clarifying question regarding the posting of teacher resumes. • Board staff responded via email.
June 12, 2019	Board staff notified Charter Holder of its 30-day Failure to Submit the required documentation from the report. Most of the violations were not sufficiently addressed by the original deadline. The Charter Holder was given a final deadline of June 19, 2019 to correct the outstanding noncompliance issues.



	<ul style="list-style-type: none"> Ms. Jackson responded, "I will resubmit missing data tomorrow; however, I will need assistance with uploading request to website." Board staff directed her to the Charter Holder's assigned education program manager.
June 17, 2019	<p>Ms. Jackson submitted the following documentation: revised meeting minutes, revised enrollment documents, and a letter confirming the school's FCC policies.</p> <p>The Charter Holder submitted the Program of Instruction ("PofI") amendment request through ASBCS Online as required in the final report.</p>
June 18, 2019	Board staff notified the Charter Holder that the June 17, 2019 Pol request was deemed administratively incomplete.
June 19, 2019	The Charter Holder submitted a second PofI amendment request through ASBCS Online.
June 24, 2019	<p>Board staff notified Charter Holder of its 7-day Failure to Submit the required documentation from the report. The Charter Holder was notified in the letter that it would be placed on the next Board agenda.</p> <p>Board staff notified the Charter Holder that the Pol request was deemed administratively incomplete.</p>
June 25, 2019	<p>The Charter Holder submitted a third Pol amendment request through ASBCS Online.</p> <p>Ms. Jackson submitted a narrative to explain the status of the volunteer's FCC and confirmation that the required PofI amendment had been submitted through ASBCS Online.</p>
June 26, 2019	Board staff notified the Charter Holder that the Pol request was deemed administratively complete and moved to substantive review.
June 26, 2019	Board staff notified the Charter Holder that the Pol request was deemed substantively incomplete, and the Charter Holder was given a deadline of July 11, 2019 to submit necessary revisions for substantive completeness before the amendment would be closed.
June 27, 2019	<p>After review of all submissions, Board staff issued a Site Visit Closeout notification to the Charter Holder based on issues identified at the onsite visit.</p> <p>Board staff updated the Charter Holder's operational dashboard to reflect the closeout status.</p>
July 11, 2019	The Charter Holder failed to submit revisions to the Pol amendment, and it was automatically closed.
July 25, 2019	Board staff notified the Charter Holder that because it had failed to properly update the School's Pol, the Charter Holder was out of compliance with its contract and needed to submit a new Pol amendment or be placed on the August Board meeting agenda.

July 29, 2019	The Charter Holder submitted a fourth Pol amendment request through ASBCS Online.
July 31, 2019	Board staff notified the Charter Holder of its Failure to Meet Operational Performance Expectations. The notification stated that the Charter Holder would be placed on the September 9, 2019 Board agenda for disciplinary action.
August 6, 2019	Board staff notified the Charter Holder that the Pol request was deemed administratively complete and moved to substantive review.
August 22, 2019	Board staff notified the Charter Holder that the Pol request was deemed substantively complete and approved.





Arizona State Board for Charter Schools

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Phoenix, AZ 85009

June 12, 2019

Victory High School, Inc.
Dr. Shirley Branham, Charter Representative
P.O. Box 8374
Phoenix, AZ 85066

Sent via email: victoryhighschool@gmail.com

RE: 30 Day Failure to Submit – Victory High School, Inc. – Entity ID 4358

Dear Charter Representative,

On April 26, 2019, Victory High School, Inc. (“Charter Holder”) was notified of its 30-day follow-up requirement as part of an onsite visit conducted March 27, 2019. The Charter Holder did not submit all the required information detailed in the final report on or before the due date of May 27, 2019. As a result of not submitting timely, the Charter Holder’s operational performance dashboard has been recorded to reflect Measure 2.e.: Timely Submission.

In accordance with A.A.C. R7-5-505, the Charter Holder is required to demonstrate that all identified noncompliance issues have been addressed by the specified deadline. Therefore, as a final opportunity, by June 19, 2019, the Charter Holder must address these noncompliance issues by providing the submission requirements outlined in the table below.

Failure to provide required follow-up, as described below, by **June 19, 2019** will be recorded in Measure 2.e. of the Charter Holder’s operational performance dashboard.

Additionally, failure to submit timely may result in the remaining issue(s) being placed on a subsequent Board meeting agenda for possible disciplinary action pursuant to R7-5-505(G), in which the Board may take action, including withholding up to ten percent of the monthly state aid apportionment, issuing a notice of intent to revoke the charter, or other remedial actions.

In accordance with R7-5-501(C), if the specified deadline has not passed, Board staff may grant a charter holder an extension to the specified deadline. In order to request an extension, please send an email to charterschoolboard@asbcs.az.gov.

Compliance Item	Findings	Required Submission
<p>Program of Instruction</p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> • Submission of an administratively complete program of instruction amendment request to properly update the charter contract. <p><u>The Charter Holder submitted a narrative response titled, “Victory High School” “Program of Instruction Amendment Request”. It describes the change in the program of instruction for the School.</u> <u>However, the required documentation was deemed insufficient because the Charter Holder did not submit an administratively complete program of instruction amendment request through ASBCS Online to properly update the charter contract.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> • Submission of an administratively complete program of instruction amendment request to properly update the charter contract completed through ASBCS Online.
<p>Open Meeting Law</p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> • Documentation of compliance with A.R.S. §§38-431.01(B), (C), (D) and -431.03(B) that require public meeting minutes include: <ul style="list-style-type: none"> ○ Date, time, and place of meeting. ○ Names of members of the public body present or absent. ○ A general description of matters considered. ○ An accurate description of all legal actions proposed, discussed, or taken, including a record of how each member voted and the names of members who propose each motion. ○ The minutes shall also include the names of the persons, as given, making statements or representing material to the public body and a reference to the legal action about which they made statements or presented materials. <p><u>The Charter Holder submitted amended minutes for the October 15, 2018 meeting. The submission was deemed insufficient because the amended minutes do not list the governing body member Debra Murphy as absent or present.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> • Documentation of compliance with A.R.S. §§38-431.01(B), (C), (D) and -431.03(B) that require public meeting minutes include: <ul style="list-style-type: none"> ○ Date, time, and place of meeting. ○ Names of members of the public body present or absent. ○ A general description of matters considered. ○ An accurate description of all legal actions proposed, discussed, or taken, including a record of how each member voted and the names of members who propose each motion. ○ The minutes shall also include the names of the persons, as given, making statements or representing material to the public body and a reference to the legal action about which they made statements or presented materials.

<p>Fingerprint Clearance Cards and Fingerprint Checks</p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> • A copy of the fingerprint clearance card for Mr. Bloom. • A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> ○ The policy must address how the School will ensure compliance with volunteer teacher substitutes. • Confirmation that you have read A.R.S. §§15-512 and 15-183 (C)(5) and the Board’s guidance document in their entirety and understand what it means to be in compliance. <p><u>The required documentation was not submitted. On May 22, 2019, Ms. Jackson stated in an email to Board staff that Mr. Bloom had an appointment scheduled the day before to complete his fingerprint clearance card application. In response, Board staff requested the number of his application or a copy of it. In an email on June 6, 2019, Ms. Jackson indicated that Mr. Bloom had a family emergency, and she was unable to get in touch with him. As of June 11, 2019, Mr. Bloom’s application and/or Fingerprint Clearance Card has not been received by Board staff.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> • A copy of the fingerprint clearance card for Mr. Bloom. • A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> ○ The policy must address how the School will ensure compliance with volunteer teacher substitutes. • Confirmation that you have read A.R.S. §§15-512 and 15-183 (C)(5) and the Board’s guidance document in their entirety and understand what it means to be in compliance.
<p>Enrollment Policy</p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> • An updated copy of the enrollment checklist • An updated copy of the enrollment brochure <p><u>The Charter Holder submitted a revised enrollment brochure. The submission was deemed insufficient because the revised enrollment checklist was not submitted.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> • An updated copy of the enrollment checklist.



Arizona State Board for Charter Schools

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June 24, 2019

Victory High School, Inc.
Shirley Branham, Charter Representative
P.O. Box 8374
Phoenix, AZ 85066

Sent via email: victoryhighschool@gmail.com

RE: 7 Day Failure to Submit – Victory High School, Inc. – Entity ID 4358

Dear Charter Representative,

On April 26, 2019, Victory High School, Inc. (“Charter Holder”) was notified of its 30-day follow-up requirement as part of an onsite visit conducted March 27, 2019. On June 12, 2019, the Charter Holder was issued a second notification outlining the missing submissions based on the 30 day follow up letter. The missing submissions were due to Board staff by June 19, 2019. Board staff received documentation from the Charter Holder on June 17, 2019.

Upon reviewing these submissions, Board staff determined that the Charter Holder did not submit all the required information detailed in the June 12, 2019 notification letter. As a result of not submitting timely, the Charter Holder’s operational performance dashboard has been recorded to reflect Measure 2.e.: Timely Submission.

In accordance with A.A.C. R7-5-505, the Charter Holder is required to demonstrate that all identified noncompliance issues have been addressed by the specified deadline. The Charter Holder has not demonstrated compliance as of the issuance of this letter.

Therefore, the Charter Holder will be placed on the August 12, 2019 Board meeting agenda for possible disciplinary action pursuant to R7-5-505(G), in which the Board may take action, including withholding up to ten percent of the monthly state aid apportionment, issuing a notice of intent to revoke the charter, or other remedial actions.

Further, because the Charter Holder is currently out of compliance with the terms of its contract until the issues identified below are addressed, any requests submitted that are not addressing the issues will be rejected and closed until the noncompliance issues have been addressed.

The table below outlines the outstanding noncompliance issues:

Compliance Item	Findings	Required Submission
<p>Program of Instruction</p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> Submission of an administratively complete program of instruction amendment request to properly update the charter contract completed through ASBCS Online. <p><u>On May 22, 2019, the Charter Holder submitted a narrative response titled, "Victory High School" "Program of Instruction Amendment Request". It describes the change in the program of instruction for the School.</u></p> <p><u>On June 17, 2019, the Charter Holder submitted a Program of Instruction Amendment request which was deemed administratively incomplete.</u></p> <p><u>On June 19, 2019, the Charter Holder submitted a second Program of Instruction Amendment request which was deemed administratively incomplete.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> Submission of an administratively complete program of instruction amendment request to properly update the charter contract.
<p>Fingerprint Clearance Cards ("FCC") and Fingerprint Checks</p>	<p>Initial submission requirement:</p> <ul style="list-style-type: none"> A copy of the fingerprint clearance card for Mr. Bloom. A copy of the School's policies and procedures for ensuring compliance with A.R.S. §§ 15-512 and 15-183(C)(5). <ul style="list-style-type: none"> The policy must address how the School will ensure compliance with volunteer teacher substitutes. Confirmation that you have read A.R.S. §§15-512 and 15-183 (C)(5) and the Board's guidance document in their entirety and understand what it means to be in compliance. <p><u>The school's policies and procedures requested were submitted. The confirmation requested was submitted.</u></p> <p><u>The submission was deemed insufficient due to the School not submitting a copy of Mr. Bloom's fingerprint clearance card or card application.</u></p>	<p>Current submission requirement:</p> <ul style="list-style-type: none"> A copy of the fingerprint clearance card for Mr. Bloom.