

## **AGENDA ITEM EXECUTIVE SUMMARY: Compliance Matters — Arizona Academy of Science & Technology**

### Issue

Arizona Academy of Science & Technology (“Charter Holder”) is out of compliance with its charter contract, federal and state laws due to its failure to submit required documentation to address issues identified during a site visit. This documentation was due to Board staff by November 22, 2018. This includes proof of teaching background and work experience for an instructional staff member and a copy of the method used to inform parents and guardians of the availability of school employees’ educational and teaching background and experience pursuant to A.R.S. §15-183(F), a copy of the school’s policies and procedures regarding appropriate fingerprinting checks, submission of lesson plans to review the charter’s program of instruction, and proof of a school inspection related to a school health incident at Arizona Academy of Science & Technology school. Pursuant to A.A.C. R7-5-505(G), the Board shall require a charter holder that fails to demonstrate that all identified compliance issues have been addressed to appear before the Board and may subject the charter holder to additional oversight pursuant to A.A.C. R7-5-601(D).

### Background

In accordance with A.R.S. §15-182(E)(1), the Board shall exercise general supervision over charter schools sponsored by the Board. On September 5, 2018, Board staff conducted a site visit to Arizona Academy of Science & Technology school (“AAST”), a school operated by the Charter Holder. During the site visit, Board staff met with Principal D’Andrea Chapman. At the site visit, three issues were identified that required immediate compliance and the remaining issues identified are detailed in the Charter Holder’s Onsite Visit Final Report (see *Appendix A*). The time-sensitive issues identified were:

- Fingerprinting issues related to instructional staff.
- Board staff observed students being transported through a ridesharing company and requested copies of the waivers signed by parents for the students using this service.
- Ms. Chapman disclosed that the school hired a driver and had purchased a van and that the driver would begin transporting students the week following the site visit. Staff requested information on the passenger load of the van, documentation on the van that was purchased, and the start date of the driver.
- Board staff was informed at the site visit of a potential concern with lice and bedbugs at AAST and requested detailed information on how the issue was addressed by the school.

The remaining issues identified included:

- The instructional schedules for each grade served by AAST, provided by Ms. Chapman, did not clearly outline the instructional hours for each content area in each grade. Board staff was unable to determine compliance with A.R.S. §15-901.
- Teaching background and experience information for several employees that provide instruction to students at AAST was not available for viewing, pursuant to A.R.S. §15-183(F).
- Evidence indicating parents had been informed of the availability of the information related to the education and experience of instructional staff pursuant to A.R.S. §15-183(F) was not available for viewing.



- The enrollment and attendance policies were reviewed and found not to be in compliance pursuant to Arizona Revised Statutes related to enrollment.
- Limited curricular resources, access to technology (Chromebooks), and professional development training were findings and concerns Board staff has and reviewed with Ms. Chapman. Board staff requested lesson plans for all content areas for grades K through 8<sup>th</sup> for a one-week period to review the charter’s program of instruction.

### Charter Holder Profile

The Charter Holder was granted a renewal charter in 2012. The Charter Holder operates one school, AAST, serving grades K-8 in Phoenix. For fiscal year 2019, the Charter Holder is reporting a 100<sup>th</sup> Day Average Daily Membership count of 55.503 as of December 6, 2018. For additional information on the Charter Holder, see *Appendix B: Charter Holder Profile*.

### Communication Timeline

September 5, 2018	Board staff conducted a site visit at AAST and identified several non-compliance issues. Three issues identified were time-sensitive and required information from the Charter Holder within 24 to 48 hours.
September 6, 2018	Board staff sent two emails to the charter representative, Grant Creech. The first email had a due date of <u>9-7-18</u> . Issues included: <ul style="list-style-type: none"> <li>• Students being transported through a ridesharing company. This prompted Board staff to request copies of the waivers signed by parents for the students using this service.</li> <li>• Ms. Chapman disclosed that the school hired a driver and had purchased a van and that the driver would begin transporting students the following week. Staff requested information on the passenger load of the van, documentation on the van that was purchased, and the start date of the driver.</li> <li>• At the site visit, staff was made aware of a potential concern with lice and bed bugs at the school. Staff requested detailed information on how this issue was addressed.</li> </ul> <p>The second email required the Charter Holder to address a fingerprinting issue for the Kindergarten teacher on AAST’s staff roster and set a due date of 9-8-18.</p>
September 7, 2018	Ms. Chapman emailed staff and attached documentation to address the first email sent on 9-6-18. Additionally, she clarified that the van is being leased and not purchased and that the agreement was being reviewed. Regarding information on the driver, she indicated it would be sent along with the requested information. <p>As of 1-7-19, no additional information has been received from the Charter Holder regarding the driver or passenger van.</p>
September 8, 2018	The Charter Holder missed the deadline date for the fingerprinting issue identified in the email sent on 9-6-18.
September 10, 2018	Ms. Chapman emailed staff indicating that the Kindergarten teacher identified with a fingerprinting issue no longer worked at AAST.



	In a subsequent email, Board staff asked the Charter Holder to identify who would be instructing the kindergarten students since staff knew that the school only had one Kindergarten teacher. Ms. Chapman responded to staff and indicated she would provide the information by close of business on <u>9-10-18</u> . A response was later provided on 9-19-18.
September 18, 2018	Board staff emailed the Charter Representative and school principal detailing staff's attempts to contact the charter representative and reiterating the required items due from the time-sensitive issues related to the passenger van.
September 19, 2018	Ms. Chapman emailed Board staff to explain that the student transportation agreement was still pending. She attached the resume of the newly hired kindergarten teacher.
September 25, 2018	After final review of documentation collected at the site visit and documents received via email by the Charter Holder, Board staff emailed and attached the Onsite Visit Final Report and enrollment findings letter. Both attachments outlined the issues identified during the site visit and the required submissions needed in response. The due date for the required information was <u>10-25-18</u> .
October 25, 2018	In separate emails, Ms. Chapman submitted a detailed attendance report, the enrollment packet, documentation of teacher curriculum training in Odysseyware, and instructional schedules. In a subsequent email, Ms. Chapman notified staff that the remaining required information would be sent the next morning due to technical difficulties. Those documents were later submitted on 10-29-18.
October 26, 2018	The remaining required information was not submitted by the Charter Holder.
October 29, 2018	In separate emails, Ms. Chapman submitted additional documents detailed in the Onsite Visit Final Report.
November 15, 2018	Board staff sent an email to the Charter Representative and school principal, following up on the required submission of a valid fingerprint card for the Special Education teacher that provides services virtually. In a phone conversation with Board staff, Ms. Chapman indicated that the Special Education teacher she identified was managing the special education program and not providing services to the students. The school has submitted documentation for the onsite Special Education teacher and Special Education Specialist. These employees were not on the original staff roster viewed by Board staff at the site visit.
November 15, 2018	After reviewing the required documentation submitted by the school principal on October 25 and 29, 2018, Board staff sent an email to the Charter Representative and school principal notifying them that required documents outlined in the final report were missing and that several of the submitted documents did not address the identified issues. Since the Charter Holder failed to address the identified issues within the 30 day timeframe, Board staff attached a 30 Day Failure to Submit letter further outlining the missing documents and necessary submissions. The submission deadline date was <u>11-22-18</u> .



November 19, 2018	Ms. Chapman emailed Board staff the fingerprint clearance card and resume for the Special Education Specialist.
November 22, 2018	The required information outlined in the email sent by Board staff on 11-15-18 was not submitted timely.
November 26, 2018	In separate emails, Ms. Chapman emailed Board staff with the lesson plans, instructional schedules, and the school's process for reporting attendance.
November 26, 2018	In a separate email, Ms. Chapman emailed Board staff explaining that the student/parent handbook had been updated but had not been ratified by the school board.
November 26, 2018	In a separate email, Ms. Chapman explained that one of the staff members identified as missing information on work experience and education was a paraprofessional and not a teacher.
November 29, 2018	Board staff responded to Ms. Chapman's questions regarding the paraprofessional and handbook. Staff clarified that a paraprofessional provides instructions to students, similarly to a teacher, and therefore, AAST is required to have a description of work experience and education for her available to parents. Staff further clarified that Ms. Chapman should submit the updated handbook regardless of its ratification by the school board.
December 28, 2018	Board staff sent an email to the Charter Representative and school principal informing them that staff had not received the required submissions outlined in the November 29 <sup>th</sup> email, that they were still responsible for submission of those documents, and that the Charter Holder will be brought before the Board during the January Board meeting.
January 7, 2019	<p>After reviewing the required documentation submitted by Ms. Chapman between November 26, 2018 and January 5, 2019, Board staff sent an email to the Charter Representative and school principal notifying them that required documents outlined in the final report continued to be missing and Board staff is unable to determine if the Charter Holder is in compliance. The outstanding issues include:</p> <ul style="list-style-type: none"> <li>• Missing lesson plans for: Math in grades K, 1,2, 5 and 8, Reading/ELA in grades K and 3<sup>rd</sup> through 8<sup>th</sup>, Science in grades K through 4<sup>th</sup>, and Social Studies in grades K through 8<sup>th</sup>.</li> <li>• Missing documentation demonstrating proof of education and work experience for an instructional employee.</li> <li>• Missing a copy of the notification sent to parents pursuant to A.R.S. §15-183(F).</li> <li>• Missing a copy of the school's policies and procedures for ensuring compliance with A.R.S. §§15-512 and 15-183 (C) (5).</li> <li>• Missing proof of a school inspection regarding bed bugs.</li> </ul>



## Appendix A: Onsite Visit Final Report



# Onsite Visit Final Report

## CHARTER INFORMATION

<b>Charter Holder Name</b>	<b>Arizona Academy of Science and Technology</b>	<b>School Name</b>	<b>Arizona Academy of Science and Technology</b>
<b>Charter Holder Entity ID</b>	<b>6378</b>	<b>Site Visit Date</b>	<b>September 5, 2018</b>
			<b>Final Report Date</b>
<b>September 25, 2018</b>			

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 September 5, 2018, Board staff conducted an unannounced site visit to Arizona Academy of Science and Technology (“the School”). The unannounced site visit was prompted by information presented to the Board. During the site visit, Board staff met with Principal D’Andrea Chapman.

### School Background

School Name	Month/ Year Open	Location	ADM*	Grade Levels Served
Arizona Academy of Science & Technology	August/ 1998	Phoenix	33.67	K-8

\*ADM as of 7/23/2018

### Contractual Compliance Review

Specific areas of the charter contract were reviewed to ensure the Charter Holder is in compliance. If Board staff identified contractual or legal non-compliance issue(s) at the site visit, each issue is reflected on the Charter Holder’s Operational Performance Dashboard, with required submissions to come into compliance due on **October 25, 2018**. The table below identifies the contractual or legal compliance components that are out of compliance. In the case of operational non-compliance issues, the table specifies what the Charter Holder is required to submit by **October 25, 2018**.

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 October 25, 2018 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](mailto:charterschoolboard@asbcs.az.gov).

Compliance Item	Findings	Required Submission
<b>Instructional Hours</b>	<p>The School’s principal provided staff with a schedule titled “Extended Learning Schedule/Master Schedule” and class schedules for grades K-8. The grade level schedules reported morning assembly, lunch, PE, Art/Technology, and dismissal times. Upon review of the provided schedules, staff found that they did not provide information as to the content of class time or instructional hours. Staff was unable to calculate the instructional hours and determine compliance pursuant to A.R.S. §15-901.</p> <p>Recorded Measure 1.b.: Instructional Days [State requirement only]</p>	<p>Provide revised class schedules for each grade served by the School (grades Kindergarten through 8<sup>th</sup>) for the following content classes: Math, Reading, Writing, Science and Social Studies.</p>
<b>Fingerprint Clearance Cards and Fingerprint Checks</b>	<p>Fingerprint clearance cards (“FCCs”) and fingerprint checks were reviewed pursuant to A.R.S. §§15-183 (C) (5) and 15-512. At the site visit, no evidence of an FCC was provided for two instructional employees (Kindergarten teacher and Special Education teacher).</p> <p>The Kindergarten teacher was present at the School on the day of the site visit. The Charter Holder was sent a notification letter on September 6, 2018 that required the Charter Holder to come into compliance within 48 hours of receipt of the notification. Within the 48-hour</p>	<p>Provide:</p> <p>A copy of the fingerprint clearance card for the Special Education teacher that was not available for viewing on the day of the site visit.</p> <p>A copy of the School’s policies and procedures for ensuring compliance with A.R.S. §§15-512 and 15-183 (C) (5).</p> <p>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>



	<p>time-frame, the Charter Holder notified Board staff that the Kindergarten teacher is no longer employed by the School.</p> <p>Principal Chapman explained that the Special Education teacher provides services virtually to the School's students with disabilities. At the time of the site visit she indicated she would contact the Special Education teacher to obtain the appropriate fingerprint check. No information has been provided to Board staff as of yet.</p> <p>Recorded in Measure 2.c: Fingerprinting</p>	
<p><b>Instructional Staff Education and Experience</b></p>	<p>Teaching background and experience information for the following staff members was not available pursuant to A.R.S. §15-183(F):</p> <ul style="list-style-type: none"> <li>- Giovanni Mustaca (teacher)</li> <li>- Reyna O'Campo (Para-professional)</li> <li>- Brad Larsen (Virtual SpEd teacher)</li> <li>- Clare Vance (teacher)</li> </ul> <p>Evidence was not provided to indicate parents had been notified of the availability of the resumes for instructional staff pursuant to A.R.S. §15-183(F)</p> <p>Recorded in Measure 2.d.: Teacher Resumes</p> <p>Recorded in Measure 2.d.: Parent Notification</p>	<p>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: Giovanni Mustaca, Reyna O'Campo, Brad Larsen, Clare Vance</p> <p>A copy of the notification sent to parents of students notifying them of the availability of instructional staff resumes to review upon request.</p> <p><i>Note: Some of the resumes reviewed contained personal identifiable information. A.R.S. §15-183(F) does not require the school to provide any personal identifiable information.</i></p>
<p><b>Enrollment and</b></p>	<p>The enrollment and attendance policies were reviewed and found NOT to be in compliance</p>	<p>Based on the issues identified in the enrollment findings letter the Charter Holder will have multiple required</p>





<p><b>Attendance Policies</b></p>	<p>pursuant to Arizona Revised Statutes related to enrollment.</p> <p>Staff reviewed the enrollment system completed through azast.org, as well as an enrollment packet provided to us by Principal Chapman. Principal Chapman indicated that the website enrollment system is no longer in use, but it was reviewed due to its availability to parents.</p> <p>Staff was informed by Principal Chapman that the handbook had yet to be revised by the School Board since the last visit on June 4, 2018. Upon review of the existing handbook, several policy issues were identified.</p> <p>Recorded in Measure 2.b.: Enrollment Processes</p>	<p>submissions. Detailed information is provided in a separate letter titled "FY19_Closed and New Enrollment Letter_Arizona Academy of Science and Technology".</p>																																	
<p><b>Student Count</b></p>	<p>On the day of the site visit, a total of 73 students were counted. The teacher logs provided by the School reported 65 students.</p> <p>The discrepancy between the students counted and students reported is more than 5%, the threshold used to determine whether additional information is required.</p>	<p>Provide copies of the attendance reports created through the School's student information system, beginning with the first day of the school year through the date of the site visit (September 5, 2018). In addition, the charter holder needs to submit an explanation of the process the charter uses to collect and submit daily attendance reports.</p> <table border="1" data-bbox="787 1354 1421 1816"> <thead> <tr> <th>Grade</th> <th>Observed*</th> <th>Reported Enrolled</th> <th>Reported Absent</th> <th>Reported Present</th> </tr> </thead> <tbody> <tr> <td>K</td> <td>13</td> <td>38</td> <td>1</td> <td>13</td> </tr> <tr> <td>1</td> <td rowspan="2">12 students in grades 1-2</td> <td>18</td> <td>2</td> <td>6</td> </tr> <tr> <td>2</td> <td>12</td> <td>0</td> <td>5</td> </tr> <tr> <td>3</td> <td rowspan="2">15 students in grades 3-4</td> <td>17</td> <td>0</td> <td>8</td> </tr> <tr> <td>4</td> <td>22</td> <td>0</td> <td>7</td> </tr> <tr> <td>5</td> <td></td> <td>14</td> <td>1</td> <td>8</td> </tr> </tbody> </table>	Grade	Observed*	Reported Enrolled	Reported Absent	Reported Present	K	13	38	1	13	1	12 students in grades 1-2	18	2	6	2	12	0	5	3	15 students in grades 3-4	17	0	8	4	22	0	7	5		14	1	8
Grade	Observed*	Reported Enrolled	Reported Absent	Reported Present																															
K	13	38	1	13																															
1	12 students in grades 1-2	18	2	6																															
2		12	0	5																															
3	15 students in grades 3-4	17	0	8																															
4		22	0	7																															
5		14	1	8																															



		6	18 students in grades 5-6	14	3	6
		7	15 students in grades 7-8	8	4	3
		8		14	2	9
		<b>Total</b>	<b>73</b>	<b>157</b>	<b>13</b>	<b>65</b>
<b>Program of Instruction</b>	<p>Board staff reviewed concerns and findings with Principal Chapman after conducting classroom observations. Concerns included access to Chromebooks, limited curricular resources, and professional development training.</p> <p>Principal Chapman explained that each student at the School will be provided Chromebooks after the training on Odysseyware is completed. The training was scheduled for September 7, 2018.</p> <p>In regard to the curricular resources, she explained that the current text books are used as supplemental resources and that Odysseyware is the School's curriculum. At the time of the visit, the teachers were not implementing Odysseyware because the training had not taken place.</p>	<p>Provide:</p> <p>Documentation of implemented lesson plans, samples of student work, and formative assessments related to the lesson plans that align with Arizona state standards in math, reading, writing, science and social studies for grades K-8 for the week of September 3, 2018.</p> <p>Documentation of the agenda, minutes and materials for the Odysseyware professional development training.</p> <p>Documentation of completed daily walkthroughs.</p>				
<b>Health Concerns</b>	<p>Board staff was informed at the site visit of a potential concern with lice and bedbugs at the School.</p> <p>On August 22, 2018, Principal Chapman submitted a letter that was sent home to parents addressing bedbugs at the</p>	<p>Provide:</p> <p>Proof of the school inspection cited in the letter, as well as information regarding any other action taken in response to the health concerns.</p> <p>Confirmation that the following resources have been read:</p>				



	<p>School. The letter stated, “AZAST will conduct an inspection and, if needed, will implement our integrated pest management plan. AZAST will continue to work to address and eradicate bed bugs and any other pests, provide thorough inspections of schools, and have licensed pest control specialists assist with pest management.”</p>	<p><a href="https://www.epa.gov/sites/production/files/2016-07/documents/bed-bug-guidance-for-school-administrators-teachers-staff.pdf">https://www.epa.gov/sites/production/files/2016-07/documents/bed-bug-guidance-for-school-administrators-teachers-staff.pdf</a></p> <p><a href="https://www.maricopa.gov/2182/Bed-Bugs---English">https://www.maricopa.gov/2182/Bed-Bugs---English</a></p> <p><a href="https://www.cdc.gov/parasites/bedbugs/faqs.html">https://www.cdc.gov/parasites/bedbugs/faqs.html</a></p> <p><a href="https://www.epa.gov/bedbugs">https://www.epa.gov/bedbugs</a></p>
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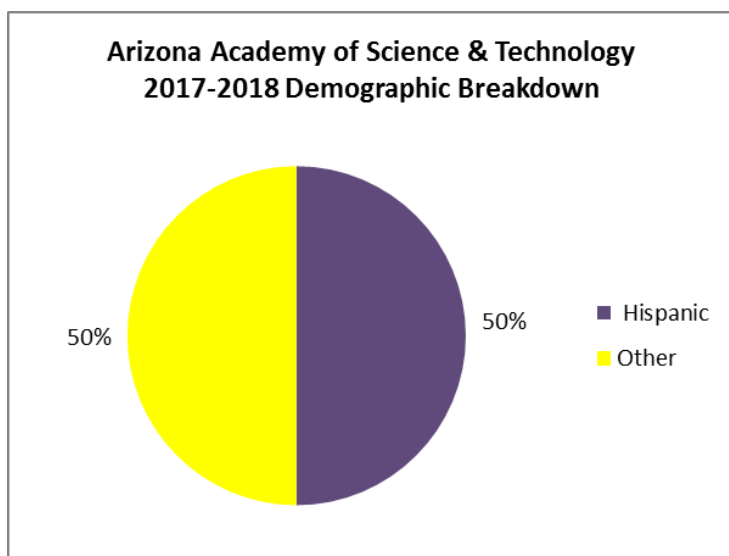
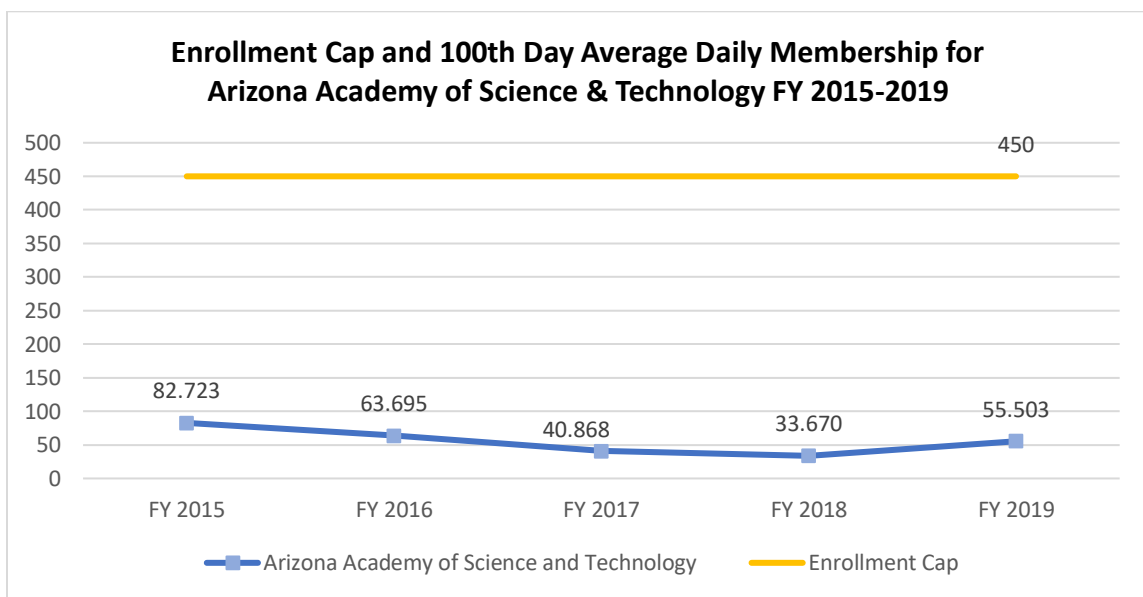
# Appendix B: Charter Holder Profile



Corporate Board Members	
Grant Creech	
David DeKoster	
Jaime Martinez	
Steve Miller	
Justin Schmitt	

Enrollment and Demographic Data

100th Day Average Daily Membership for FY 2015–FY 2018, and FY 2019 ADM as of December 6, 2018.



2017-2018 Subgroup Data	
Free and Reduced Lunch	74%
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

School Name	Arizona Academy of Science & Technology		
Date Open	August 1998		
Location	Phoenix		
Grades Served	K-8		
FY 18 Letter Grade	F		
	FY 16	FY 17	FY 18
ELA AzMERIT (41% <sup>+</sup> )	11%	<2%	16%
Math AzMERIT (41% <sup>+</sup> )	8%	<2%	11%
Science AIMS (52% <sup>+</sup> )	N/A	*	50%

\*FY 18 State Average Passing

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

## Financial Performance

Financial Performance						
Arizona Academy of Science & Technology				Interpreting the Financial Performance Dashboard		
Fiscal Year 2017				Fiscal Year 2018		
Near-Term Measures						
<b>Going Concern</b>	Yes	Falls Far Below	Yes	Falls Far Below		
<b>Unrestricted Days Liquidity</b> <small>&lt;30, but ≥15: Does Not Meet &lt;15: Falls Far Below</small>	3.24	Falls Far Below	12.00	Falls Far Below		
<b>Default</b>	No	Meets	Yes	Falls Far Below		
Sustainability Measures*						
<b>Net Income</b> <small>≤0: Does Not Meet</small>	(\$243,386)	Does Not Meet	(\$123,082)	Does Not Meet		
<b>Fixed Charge Coverage Ratio</b> <small>&lt;1.10: Does Not Meet</small>	(0.22)	Does Not Meet	0.16	Does Not Meet		
<b>Cash Flow (3-Year Cumulative)</b> <small>Negative: Does Not Meet**</small>	(\$17,563)	Does Not Meet	\$3,579	Meets		
<b>Cash Flow Detail by FY</b>	FY 2017	FY 2016	FY 2015	FY 2018	FY 2017	FY 2016
	\$4,240	(\$22,526)	\$723	\$21,865	\$4,240	(\$22,526)

Does Not Meet Board's Financial Performance Expectations

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

## Operational Performance

### Operational Performance Dashboard

Click on any of the measures below to see more information.

**Effective July 1, 2017 and going forward:**

An "\*" means the noncompliance has been addressed under AAC R7-5-505(F), a complete corrective action plan has been received and implementation is required under AAC R7-5-510(C)(1), the charter holder is complying with the terms of an agreement with the Board, or no further action is required at this time.

A "\*\*\*" means a corrective action plan has been assigned by another entity, the appeal window for action taken by another entity has not closed, appeal of an action taken by another entity is pending, or is an issue of noncompliance in which another entity oversees.

Measure	2015	2016	2017	2018	2019
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	Does Not Meet	Meets	Meets	Does Not Meet
2.a. Do the charter holder's annual audit reporting packages reflect sound operations?	Does Not Meet	Meets	Falls Far Below	Falls Far Below	Does Not Meet
2.b. Is the charter holder administering student admission and attendance appropriately?	Meets	Meets	Meets	Does Not Meet	Does Not Meet
2.c. Is the charter holder maintaining a safe environment consistent with state and local requirements?	Meets	Meets	Meets	Does Not Meet	Does Not Meet
2.d. Is the charter holder transparent in its operations?	Meets	Meets	Meets	Meets	Does Not Meet
2.e. Is the charter holder complying with its obligations to the Board?	Meets	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?	Does Not Meet	Does Not Meet	Falls Far Below	Falls Far Below	Does Not Meet
3. Is the charter holder complying with all other obligations?	Meets	Meets	Meets	Meets	--
<b>OVERALL RATING</b>	Meets Operational Standard	Meets Operational Standard	Does Not Meet Operational Standard	Does Not Meet Operational Standard	Does Not Meet Operational Standard
<b>BOARD EXPECTATIONS</b>	--	--	Does Not Meet Operational Expectations	Does Not Meet Operational Expectations	Does Not Meet Operational Expectations

Last Updated: 2018-12-18 11:30:40

