



International American Education Federation, Inc., d/b/ a International Leadership of Texas

January 16, 2019 Regular Meeting and Public Hearing of the Charter FIRST Rating Report

Date and Time

Wednesday January 16, 2019 at 6:15 PM CST

Location

1820 N. Glenville Drive, Suite 100, Richardson, TX 75081

Meeting Notice & Mission Statement

In compliance with the Texas Open Meetings Act, the Texas Government Code, Chapter 551, timely public advance written notice (at least 72 hours before the scheduled time of the meeting) is given of the subjects the Board of Directors of International Leadership of Texas (the "Board"), and the Board will convene a Regular Open Meeting of the Board of Directors of International Leadership of Texas on the date and time and location set forth herein. It is the intent of the Board to have a quorum physically present at the above address. Board members not physically present may participate by live two-way video and audio feed in accordance with the Texas Open Meetings Act. It is the intent of the board for the presiding officer physically present at the above address. The Board hereby certifies that this notice was posted on a bulletin board or on something akin thereto or at a place readily accessible and convenient to the public at 1820 N. Glenville Dr., #100, Richardson, TX 75081, as well as online at www.ILTexas.org. The items on this Agenda may be taken in any order. The mission of ILTexas is to prepare students for exceptional leadership roles in the international community by emphasizing servant leadership, mastering the English, Spanish, and Chinese languages, and strengthening the mind, body and character.

/s/ Finn Simmensen, For ILTexas' Board

Agenda

Purpose Presenter Time

I. Opening Items

6:15 PM

A. Record Attendance and Guests

B. Call the Meeting to Order

C. Approve Minutes of the December 19,
2018 Regular Meeting

Approve
Minutes

Approve minutes for December 19, 2018 Regular Meeting on December 19,
2018

II. Public Hearing of Charter FIRST Report

6:15 PM

- | | | |
|---|---------|------------------------------|
| A. Call to Order | FYI | Major General James Williams |
| B. Financial Integrity Rating System of Texas (FIRST) Report | Discuss | Ronald Kuehler |
| C. Adjourn Charter FIRST Public Hearing | Vote | Major General James Williams |

III. Public Speakers

IV. Information Items

6:15 PM

- | | | |
|--|-----|---------------|
| A. Presentation: Family, Career, and Community Leaders of America | FYI | Helaina Floyd |
|--|-----|---------------|

Presentation: Family, Career, and Community Leaders of America, by Helaina Floyd, ILTexas Keller-Saginaw High School

- | | | |
|--|-----|----------------|
| B. Recap of 2018 Bond Transaction | FYI | Drew Masterson |
|--|-----|----------------|

Discussion of recent successful Bond sale.

- | | | |
|----------------------|-----|------------------------------|
| C. CAO Report | FYI | Dr. Laura Carrasco-Navarrete |
|----------------------|-----|------------------------------|

Chief Academic Officer's Report by Dr. Laura Carrasco-Navarrete

- | | | |
|-----------------------------------|-----|--------------|
| D. Superintendent's Report | FYI | Eddie Conger |
|-----------------------------------|-----|--------------|

- | | | |
|----------------------|-----|---------------|
| E. CEO Report | FYI | Dr. Alan Seay |
|----------------------|-----|---------------|

Chief Executive Officer's Report by Dr. Alan Seay

1. Enrollment
2. Personnel
3. Strategic Planning Retreat -- February
4. Other

- | | | |
|--|-----|---------------|
| F. ILTexas Policy Group 1: Governance | FYI | Dr. Alan Seay |
|--|-----|---------------|

Presentation of proposed revised Policy Group 1: Governance

V. Board Action Items

6:15 PM

- | | | |
|---|------|----------------|
| A. CONSIDER/ACT ON DECEMBER, 2018 FINANCIAL REPORT | Vote | Ronald Kuehler |
|---|------|----------------|

Consider and act to approve Financial Report for December, 2018.

VI. Closed Session

6:15 PM

- | | |
|-------------------------|-----|
| A. Authorization | FYI |
|-------------------------|-----|

Closed Session for Any and All Reasons Permissible by Texas Law, including, but not limited to, Texas Government Code Sections 551.071, 551.072, 551.073, 551.074, 551.075, 551.076, 551.082, 551.083, 551.084, pertaining to any item listed on this agenda, as permitted by applicable law.

B. Discuss Personnel Matters

Discuss

Discuss Personnel Matters (551.074 Texas Government Code)
Conduct informal evaluation of Chief Executive Officer

VII. Closing Items

6:15 PM

A. Adjourn Meeting

Vote

Major
General
James
Williams

Cover Sheet

Approve Minutes of the December 19, 2018 Regular Meeting

Section: I. Opening Items
Item: C. Approve Minutes of the December 19, 2018 Regular Meeting
Purpose: Approve Minutes
Submitted by:
Related Material:
Minutes for December 19, 2018 Regular Meeting on December 19, 2018

DRAFT



International American Education Federation, Inc., d/b/a International Leadership of Texas

Minutes

December 19, 2018 Regular Meeting

Date and Time

Wednesday December 19, 2018 at 6:15 PM

Location

1820 N. Glenville Drive, Suite 100, Richardson, TX 75081

Meeting Notice & Mission Statement

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If a quorum of the Board cannot be physically present at the above address, it is the intent to have the presiding officer physically present at the above address. The Board hereby certifies that this notice was posted on a bulletin board or on something akin thereto or at a place readily accessible and convenient to the public at 1820 N. Glenville Dr., #100, Richardson, TX 75081, as well as online at www.ILTexas.org. The items on this Agenda may be taken in any order. The mission of ILTexas is to prepare students for exceptional leadership roles in the international community by emphasizing servant leadership, mastering the English, Spanish, and Chinese languages, and strengthening the mind, body and character.

/s/ Finn Simmenssen, For ILTexas' Board

Directors Present

Dr. Lynne Beach, Edwin Flores, Major General James Williams, Soner Tarim (remote)

Directors Absent

Tracy Cox

Guests Present

Alan Seay, Angela Plata, Bill Mays, Daniel Mooney, Eddie Conger, Finn Simmensen, Ronald Kuehler

I. Opening Items

A. Record Attendance and Guests

B. Call the Meeting to Order

Finn Simmensen called a meeting of the board of directors of International American Education Federation, Inc., d/b/a International Leadership of Texas to order on Wednesday Dec 19, 2018 @ 6:18 PM at 1820 N. Glenville Drive, Suite 100, Richardson, TX 75081.

C. Approve Minutes of the November 7, 2018 Regular Meeting

Dr. Lynne Beach made a motion to approve minutes from the November 7, 2018 Regular Meeting on 11-07-18.

Edwin Flores seconded the motion.

The board **VOTED** unanimously to approve the motion.

D. Approve Minutes of December 6, 2018 Special Meeting

Edwin Flores made a motion to approve minutes from the December 6, 2018 Special Meeting on 12-06-18.

Dr. Lynne Beach seconded the motion.

The board **VOTED** unanimously to approve the motion.

II. New section

A. Superintendent's Report

Mr. Conger reported to the Board.

B. CEO Report

Dr. Seay reported to the Board.

III. Board Action Items

A. CONSIDER/ACT ON Closing of Series 2019D and Series 2019E Bond Issuance

No action was needed and none was taken.

B. CONSIDER/ACT TO approve a new Depository contract

Mr. Kuehler reported to the Board, stating his recommendation that the Board approve awarding the Depository Contract to BBVA/Compass.

Edwin Flores made a motion to approve the award of the Depository Contract to BBVA Compass.

Dr. Lynne Beach seconded the motion.

The board **VOTED** unanimously to approve the motion.

C. CONSIDER/ACT ON OCTOBER, 2018 AND NOVEMBER, 2018 FINANCIAL REPORTS

Mr. Kuehler reported to the Board.

Edwin Flores made a motion to approve the Reports.

Dr. Lynne Beach seconded the motion.
The board **VOTED** unanimously to approve the motion.

D. Consider/act to modify Sick Leave Pool Policy

No action was needed and none was taken.

IV. Closing Items

A. Adjourn Meeting

Edwin Flores made a motion to adjourn the meeting.
Dr. Lynne Beach seconded the motion.
The board **VOTED** unanimously to approve the motion.
There being no further business to be transacted, and upon motion duly made, seconded and approved, the meeting was adjourned at 7:21 PM.

Respectfully Submitted,
Finn Simmenssen

Cover Sheet

Financial Integrity Rating System of Texas (FIRST) Report

Section: II. Public Hearing of Charter FIRST Report
Item: B. Financial Integrity Rating System of Texas (FIRST) Report
Purpose: Discuss
Submitted by:
Related Material: Report of 2017-18 Charter FIRST rating.pdf



International Leadership of Texas



Annual Financial Accountability Management Report

2017-18 Rating

2016-2017 Fiscal Year Data

Rating: B – Above Standard

Introduction

The primary goal of Schools FIRST is to achieve quality performance in the management of school districts' financial resources, a goal made more significant due to the complexity of accounting associated with Texas' school finance system. This is the 15th year of the School FIRST (Financial Integrity Rating System of Texas), a financial accountability system for Texas school districts developed by the Texas Education Agency in response to Senate Bill 875 of the 76th Texas Legislature in 1999. The Schools FIRST report underwent sweeping changes under HB 5, Section 49, of the 83rd Texas Legislature, Regular Session, 2013. Those changes require the commissioner of education to include processes in the financial accountability rating system for anticipating the future financial solvency of each school district and open enrollment charter school. The Commissioner's Rule for School FIRST changes under HB 5 were finalized in August 2015.

The changes to the School FIRST system implemented by the Texas Education Agency in August 2015 are being phased-in over three years. During the phase-in period, the new School FIRST system has separate worksheets for rating years 2014-2015, 2015-2016, and 2016-2017 and subsequent years. The worksheet for rating year 2014-2015 contains only 7 indicators as opposed to the 20 indicators used in 2013-2014. The worksheets for rating years 2015-2016 and 2016-2017 increases to 15 indicators. Also, the worksheet for rating year 2016-2017 will require higher scores for select ratings compared to the worksheet for rating year 2015-2016.

Legislative rules require the district to present a FIRST management report, which covers any business-related issues. The district must advertise and hold a public meeting to discuss the report. The district's School FIRST rating is based upon an analysis of data reported for the 2016-2017 school year. This information is submitted through the district's annual PEIMS (Public Education Information Management System) submissions.

The financial accountability rating of the district is based on its overall performance on certain financial measurements, ratios, and other indicators established by the commissioner of education with the financial accountability rating worksheet.

For the current rating year, 2017-2018, the district is rated as **"B – Above Standard"** with a score of 84 out of 100. This report briefly focuses on how this passing rating was achieved.

School FIRST Annual Financial Management Report

International Leadership of Texas

Title 19 Texas Administrative Code Chapter 109, Budgeting, Accounting, and Auditing Subchapter AA, Commissioner's Rules Concerning Financial Accountability Rating System, Section 109.1001(o). Effective 8/6/2015. The template has been established to help the charter schools in gathering their data and presenting it at their School FIRST hearing. The template may not be all inclusive.

Superintendent's Current Employment Contract

A copy of the superintendent's current employment contract at the time of the School FIRST hearing is to be provided. In lieu of publication in the annual School FIRST financial management report, the charter school may choose to publish the superintendent's employment contract on the charter school's Internet site. If published on the Internet, the contract is to remain accessible for twelve months.

Reimbursements Received by the Superintendent and Board Members

For the Twelve-Month Period Ended August 31, 2017	Superintendent	Board	Board	James Williams	Lynne Beach	Tracy Cox	Steven Hammerle	Board Member 7
		Member Curtis Donaldson	Member Jorge Flores					
Meals	\$ 5,807	\$	\$	\$	\$	\$	\$	\$
Lodging	\$ 5,775	\$ 643				\$ 249		
Transportation	\$ 2,024	\$ 2,469	\$ 99	\$ 96	\$ 57	\$		
Motor Fuel	\$ 457							
Other	\$ 544							
Total	\$ 14,607	\$ 3,112	\$ 99	\$ 96	\$ 57	\$ 249	\$ -	\$ -

All "reimbursements" expenses, regardless of the manner of payment, including direct pay, credit card, cash, and purchase order are to be reported.

Items to be reported per category include:

Meals – Meals consumed out of town, and in geographic-boundary meals at area restaurants (outside of board meetings, excludes catered board meeting)

Lodging – Hotel charges.

Transportation – Airfare, car rental (can include fuel on rental, taxis, mileage reimbursements, leased cars, parking and tolls).

Motor fuel – Gasoline.

Other: Registration fees, telephone/cell phone, internet service, fax machine, and other reimbursements (or on-behalf of) to the superintendent and board member not defined above.

Outside Compensation and/or Fees Received by the Superintendent for Professional Consulting and/or Other Personal Services	
For the Twelve-Month Period Ended August 31, 2017	
<u>Name(s) of Entity(ies)</u>	<u>Amount Received</u>
	\$
Total	<u>0</u>

Compensation does not include business revenues generated from a family business (farming, ranching, etc.) that has no relation to charter school business.

Gifts Received by Executive Officers and Board Members (and First Degree Relatives, if any)
 (gifts that had an economic value of \$250 or more in the aggregate in the fiscal year)

For the Twelve-Month Period Ended August 31, 2017		Superintendent	Board Member 1	Board Member 2	Board Member 3	Board Member 4	Board Member 5	Board Member 6	Board Member 7
Total		0	0	0	0	0	0	0	0

Note – An executive officer is defined as the superintendent, unless the board of trustees or the charter school administration names additional staff under this classification for local officials.

Business Transactions Between Charter School and Board Members

For the Twelve-Month Period Ended August 31, 2017		Board Member 1	Board Member 2	Board Member 3	Board Member 4	Board Member 5	Board Member 6	Board Member 7
Amounts		0	0	0	0	0	0	0

Note – The summary amounts reported under this disclosure are not to duplicate the items disclosed in the summary schedule of reimbursements received by board members.



User: ronald.kuehler
User Role: District

Rating Year: 2017-2018 CDN: [dropdown]

Select An Option [dropdown] Help Home Exit

2017-2018 Ratings Based on Fiscal Year 2017 Data - Non-University Charter School Status Summary

CDN	Region	Name	Rating	Status
057848	10	INTERNATIONAL LEADERSHIP OF TEXAS (ILT)	B - Above Standard	

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User: ronald.kuehler
User Role: District

Rating Year: 2017-2018 CDN: 057848

Select An Option Help Home Exit

2017-2018 Ratings Based on Fiscal Year 2017 Data - Charter School Status Detail

Charter School Status Detail Indicator Detail Summary Determination of Ratings

Size-Dependent Indicators

INTERNATIONAL LEADERSHIP OF TEXAS (ILT)(057848)

Status	Indicator Num	Indicator Description	Updated	Score
P	+1 1	<u>Was the complete annual financial report (AFR) and charter school financial data submitted to TEA within 30 days of the November 27 or January 28 deadline depending on the charter school's fiscal year end date of June 30 or August 31, respectively?</u>	8/1/2018 10:27:28 AM	YES
P	+1 2A	<u>Was there an unmodified opinion in the AFR on the financial statements as a whole? (The American Institute of Certified Public Accountants (AICPA) defines unmodified opinion. The external independent auditor determines if there was an unmodified opinion.)</u>	8/1/2018 10:27:28 AM	YES
	2B	<u>Did the external independent auditor report that the AFR was free of any instance(s) of material weaknesses in internal controls over financial reporting and compliance for local, state, or federal funds? (The AICPA defines material weakness.)</u>	8/1/2018 10:27:28 AM	-
P	+1 3	<u>Was the charter school in compliance with the payment terms of all debt agreements at fiscal year end? (If the charter school was in default in a prior fiscal year, an exemption applies in following years if the charter school is current on its forbearance or payment plan with the lender and the payments are made on schedule for the fiscal year being rated. Also exempted are technical defaults that are not related to monetary defaults. A technical default is a failure to uphold the terms of a debt covenant, contract, or master promissory note even though payments to the lender, trust, or sinking fund are current. A debt agreement is a legal agreement between a debtor (person, company, etc. that owes money) and their creditors, which includes a plan for paying back the debt.)</u>	8/1/2018 10:27:28 AM	YES

P	†1	4	Did the charter school make timely payments to the Teachers Retirement System (TRS), Texas Workforce Commission (TWC), Internal Revenue Service (IRS), and other government agencies?	8/1/2018 10:27:28 AM	YES
P	†1	5	Was the total net asset balance in the Statement of Financial Position for the charter school greater than zero? (If the charter school's change of students in membership over 5 years was 7 percent or more, then the charter school passes this indicator.) (New charter schools that have a negative net asset balance will pass this indicator if they have an average of 7 percent growth in students year over year until it completes its fifth year of operations. After the fifth year of operations, the calculation changes to the 7 percent increase in 5 years.)	8/1/2018 10:51:00 AM	YES
		6	Was the number of days of cash on hand and current investments for the charter school sufficient to cover operating expenses? The calculation will use expenses, excluding depreciation. For government charter schools, pension expense will be excluded.	8/1/2018 10:27:28 AM	10
		7	Was the measure of current assets to current liabilities ratio for the charter school sufficient to cover short-term debt?	8/1/2018 10:27:28 AM	4
		8	Was the ratio of long-term liabilities to total assets for the charter school sufficient to support long-term solvency? (If the charter school's change of students in membership over 5 years was 7 percent or more, then the charter school passes this indicator.) (New charter schools that have a negative net asset balance will pass this indicator if they have an average of 7 percent growth in students year over year until it completes its fifth year of operations. After the fifth year of operations, the calculation changes to the 7 percent increase in 5 years.)	8/1/2018 10:52:00 AM	10
		9	Did the charter school's revenues equal or exceed expenses, excluding depreciation? If not, was the charter school's number of days of cash on hand greater than or equal to 40 days? The calculation will use expenses, excluding depreciation. For government charter schools, pension expense will be excluded.	8/1/2018 10:27:28 AM	10
		10	Was the debt service coverage ratio sufficient to meet the required debt service?	8/1/2018 10:27:28 AM	0
		11	Was the charter school's administrative cost ratio equal to or less than the threshold ratio?	8/1/2018 10:27:28 AM	10
		12	Did the charter school not have a 15 percent decline in the students to staff ratio over 3 years (total enrollment to total staff)? (If the student enrollment did not decrease, the charter school will automatically pass this indicator.)	8/1/2018 10:27:28 AM	10
		13	Did the comparison of Public Education Information Management System (PEIMS) data to like information in the charter school's AFR result in a total variance of less than 3 percent of all expenses by function?	8/1/2018 10:27:28 AM	10
		14	Did the external independent auditor indicate the AFR was free of any instance(s) of material noncompliance for grants, contracts, and laws related to local, state, or federal funds? (The AICPA defines material noncompliance.)	8/1/2018 10:27:28 AM	10

15	Did the charter school not receive an adjusted repayment schedule for more than one fiscal year for an over-allocation of Foundation School Program (FSP) funds as a result of a financial hardship?	8/1/2018 10:27:28 AM	10
			84 Weighted Sum
			1 Multiplier Sum
			84 Score

†1: must pass 1, 3, 4, 5 and 2A

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**ILTexas Charter School FIRST
Breakdown of Indicator 7 and 10**

INDICATOR 7

A	Assets	\$	30,711,347.00
B	Liabilities	\$	21,711,337.00

Ratio to Cover Short Term Debt	1.414530436
Formula A/B	



INDICATOR 10

A	Total Revenue	\$	97,589,785.00
B	Total Expenses	\$	104,791,273.00
C	Depreciation	\$	5,230,322.00
D1	Interest Amount	\$	6,725,092.00
D2	Principal Amount	\$	1,569,647.00
E	Pension Expense		

Debt Service Coverage Ratio	0.76
Formula (A-B+C+D1+D2-E)/(D1+D2)	



User: Public
User Role: Public

Rating Year: 2017-2018 CDN: 057848 Select An Option

Home Exit

2017-2018 Indicator Test 7

Indicator Details and Formula Result Determination Reference

Charter School Name: INTERNATIONAL LEADERSHIP OF TEXAS (ILT)(057848)

Indicator: Was the measure of current assets to current liabilities ratio for the charter school sufficient to cover short-term debt?

Results/Points: 4

Last Updated: 8/1/2018 10:27:28 AM

Formula

A / B

Field	Value
A. Current Assets:	30711347.0000
B. Current Liabilities:	21711337.0000
C. Threshold for Current Assets to Current Liabilites Ratio :	1

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User: Public
User Role: Public

Rating Year: CDN:

2017-2018 Indicator Test 7

Indicator Details and Formula Result Determination Reference

Determination of Points

10	8	6	4	2	0
>=2	< 2 and >= 1.75	< 1.75 and >= 1.50	< 1.50 and >= 1.25	< 1.25 and >= 1	< 1

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User Role: Public

Rating Year: 2017-2018 ▼ CDN: 057848 ▼ Select An Option ▼

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2017-2018 Indicator Test 10

Indicator Details and Formula Result Determination Reference

Charter School Name: INTERNATIONAL LEADERSHIP OF TEXAS (ILT)(057848)
Indicator: Was the debt service coverage ratio sufficient to meet the required debt service?
Results/Points 0
Last Updated: 8/1/2018 10:27:28 AM

Formula
(A - B + C + D - E) / D

D = D1 + D2

Field	Value
A. Total Revenue:	97587185.0000
B. Total Expenses:	104781273.0000
C. Depreciation:	5230322.0000
D1. Interest Amount:	6725092.0000
D2. Principal Amount:	1569647.0000
E. Pension Expense:	0.0000

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User: Public
User Role: Public

Rating Year: 2017-2018 ▼ CDN: 057848 ▼ Select An Option ▼ Help

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2017-2018 Indicator Test 10

Indicator Details and Formula Result Determination Reference

10	8	6	4	2	0
>=	< 1.20 and >=	< 1.15 and >=	< 1.10 and >=	< 1.05 and >=	<
1.20	1.15	1.10	1.05	1.00	1.00

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Cover Sheet

Presentation: Family, Career, and Community Leaders of America

Section: IV. Information Items
Item: A. Presentation: Family, Career, and Community Leaders of America
Purpose: FYI
Submitted by:
Related Material: This Page is Blank.docx

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Cover Sheet

Recap of 2018 Bond Transaction

Section: IV. Information Items
Item: B. Recap of 2018 Bond Transaction
Purpose: FYI
Submitted by:
Related Material: This Page is Blank.docx

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Cover Sheet

CAO Report

Section: IV. Information Items
Item: C. CAO Report
Purpose: FYI
Submitted by:
Related Material: CNY 2019 AGPHS GPK8.pdf
Carrasco Board Report _ 01-16-2019.pdf
DRAFT 19-20 Calendar_Proposed(1).pdf

ILTexas wishes you a
**HAPPY LUNAR
NEW YEAR**



Join us as we celebrate the
YEAR OF THE PIG

at Arlington-Grand Prairie High School
on February 2nd from 10:00am - 12:00pm

Curriculum, Instruction, Assessment & Professional Development Board Report

Presented by: Dr. Laura Carrasco, Chief Academic Officer, 01/16/2019

***Second week of the fourth grading period/semester 2**

Area/ Director/Coordinator	Update	Campus	Grade Level	Green= New Blue = In Progress Red=complete
2019-2020 DRAFT	We have attached our DRAFT 2019-2020 Academic Calendar. It will be shared with our various stakeholders for review and input during the next couple of weeks. Further, we are monitoring neighboring fellow public school calendars. During our February board meeting we will be bringing a most updated version for your approval.	All impacted	ALL LEVELS	New
College Acceptances	Goal: 100% of ILTexas graduating seniors will be accepted into a four year university (not just a college). Update: KSHS - 31/66 - 48% AGPHS - 50/108 - 46% GHS - 28/118 - 23.7%	High school campuses with a graduating class: KSHS, AGPHS, GHS	12	In Progress
Data Analysis, Semester 1	Have completed a data analysis of semester 1 data. Each campus as well as each department has generated a plan of action as informed by the data. Each plan includes celebrations, but primarily targets any gaps and an action plan to address gaps.	All	ALL LEVELS	In Progress
GT - Jamie Rose	Campuses have completed CogAT testing and will notify newly-identified GT students by 01/19 so that services can begin with this new semester. Approximately 7% of ILTexas students are identified as Gifted (GT).	All	ALL LEVELS	In Progress
Chinese - Xiaoyan Wang	*District-Wide Lunar New Year Celebration. You're invited (see attached invitation for one campus)! *Chinese Bee	All	ALL LEVELS	In Progress

ILTexas

2019-2020 **DRAFT DRAFT** Academic Calendar

July 2019						
Su	M	Tu	W	Th	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

August 2019						
Su	M	Tu	W	Th	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

September 2019						
Su	M	Tu	W	Th	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

October 2019						
Su	M	Tu	W	Th	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

November 2019						
Su	M	Tu	W	Th	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

December 2019						
Su	M	Tu	W	Th	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

January 2020						
Su	M	Tu	W	Th	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

February 2020						
Su	M	Tu	W	Th	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29

March 2020						
Su	M	Tu	W	Th	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

April 2020						
Su	M	Tu	W	Th	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

May 2020						
Su	M	Tu	W	Th	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

June 2020						
Su	M	Tu	W	Th	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

- Student & Teacher Holiday
- Instructional Day
- Student Holiday & Teacher Data/PD Day

- Consider adding STAAR dates
- First and Last Day of School
- Consider adding parent conference window

DRAFT 2019-2020 ILTexas Academic Calendar [Org 003+]

FIRST SEMESTER	Start	End	Inst. Days	Inst. Min. K-4 [8-3:45]	Inst. Min. 5-8 [7:45-3:45]	Inst. Min. 9-12 [7:55-4:11]	Data/PD Days (Student only holidays)	# of PD Days	Teacher LOA Days	Holidays (Student/Teacher)
							5-14 Aug, PD Days	8	8	
First Grading Period	15-Aug	20-Sep	26	12,090	12,480	12,896	23 Sep, Data Day	1	27	2-Sept, Labor Day Holiday
Second Grading Period	24-Sep	1-Nov	27	12,555	12,960	13,392	15 Oct, PD Day 4-Nov, Data Day	2	29	14-Oct, Fall Break
Third Grading Period	5-Nov	19-Dec	28	13,020	13,440	13,888	6-Jan, Data Day	1	29	25-29 Nov, Thanksgiving 20-Dec-3-Jan, Winter Break
Total			81	37,665	38,880	40,176				
SECOND SEMESTER	Start	End	Inst. Days	Inst. Min. K-4 [8-3:45]	Inst. Min. 5-8 [7:45-3:45]	Inst. Min. 9-12 [7:55-	Data/PD Days		Teacher LOA Days	Holidays
Fourth Grading Period	7-Jan	14-Feb	28	13,020	13,440	13,888	17-18-Feb, Data Day/PD Day	2	30	20-Jan, MLK Day
Fifth Grading Period	19-Feb	9-Apr	32	14,880	15,360	15,872	13-April, Data Day	1	33	9-13-Mar, Spring Break 10-April, Bad Weather Day #1
Sixth Grading Period	14-Apr	21-May	28	13,020	13,440	13,888	22-May, Records Day/ Bad Weather Day #2	1	29	FYI: 25-May, Memorial Day
								2	2	*2 Self-selected/On your own PD. PD will need to be well documented (R10, R11, R4, ILTexas offerings) via Eduphoria WkShp
Total			88	40,920	42,240	43,648	Total Work Days		187	
Total Both Semesters			169	78,585	81,120	83,824	<i>HB 2610 requires min. of 75,600</i>			
Total with 4 waivers			173	80,265	82,800	85,504	<i>ILTexas min. over req: 4,655 or 9.5days (K-4); 7,000 or 15 days (5-8); and 9,904 or 20 days (9-12)</i>			
First Day of School:	15-Aug		4 State PD Waiver Days: 9/27, 10/15, 11/5, & 1/6 (Reading). 4 waiver days x 420 minutes = 1,680 minutes ; Early Release Waivers applied to Kinder only for first 6 days of school dismissal, whereby only in Kinder, parents can drop their kids off as late as 9am and pick them up as early as 1pm to help with the transition.							
Last Day of School:	21-May		Specialized PD Offerings: Aug. 1-2							
DRAFT										
<i>* We will continue to monitor changes to neighboring school districts' dates for spring break</i>										
NOTE: Garland K-8 instructional minutes vary due to the city mandated 30 min. staggered start/end times.										

Cover Sheet

Superintendent's Report

Section: IV. Information Items
Item: D. Superintendent's Report
Purpose: FYI
Submitted by:
Related Material: This Page is Blank.docx

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Cover Sheet

CEO Report

Section: IV. Information Items
Item: E. CEO Report
Purpose: FYI
Submitted by:
Related Material: CEO Report.pdf

CEO Report

January 16, 2019

1. Enrollment
2. HR Reports – Total Positions
3. HR Reports – New Hires
4. Board Retreat for Strategic Planning
 - a. Two Day Options
 - i. Feb. 8 – 9
 - ii. Feb. 15 – 16
 - iii. Feb. 22 – 23
 - iv. Mar. 1 – 2
 - b. One Day Options
 - i. Feb. 9
 - ii. Feb. 16
 - iii. Feb. 23
 - iv. Mar. 2
5. Other Issues
 - a. _____
 - b. _____
 - c. _____
 - d. _____
 - e. _____
6. ILTexas Policy Group 1: Governance

**ILTexas Enrollment Update
2018 - 19**

Campus	Capacity	Budgeted 2018-19	16-Aug	18-Sep	15-Oct	1-Nov	14-Dec	10-Jan	% of Capacity
GES	948	940	890	964	960	960	953	944	99.58%
GMS	468	460	431	468	467	466	465	463	98.93%
GHS	800	600	598	625	624	619	615	612	76.50%
LES	948	900	724	824	828	829	833	822	86.71%
LMS	468	400	397	428	420	420	415	410	87.61%
LDHS	100	0	N/A	43	43	43	42	39	39.00%
Dallas	3682	3300	3040	3352	3342	3337	3323	3290	89.35%
AES	816	800	709	793	803	814	819	811	99.39%
AMS	390	375	322	363	365	373	371	370	94.87%
AGPHS	800	650	524	540	537	538	533	527	65.88%
GPES	948	940	888	952	948	950	953	949	100.11%
GPMS	468	460	427	455	455	457	461	456	97.44%
NRHES	948	940	863	938	937	933	925	927	97.78%
NRHMS	468	380	381	426	427	426	419	412	88.03%
KES	948	940	883	948	948	944	940	940	99.16%
KMS	468	460	412	436	437	439	438	435	92.95%
KSHS	800	500	548	550	542	539	525	514	64.25%
EFTWES	948	860	701	780	784	788	781	770	81.22%
EFTWMS	468	350	316	354	352	345	338	333	71.15%
EFTWHS	50	0	24	30	28	28	24	24	48.00%
SES	948	940	883	942	942	940	923	922	97.26%
SMS	468	360	380	390	389	386	386	380	81.20%
Tarrant	9836	8955	8261	8897	8894	8900	8836	8770	89.16%
CSES	948	800	710	750	755	758	758	772	81.43%
CSMS	468	300	181	195	205	208	210	218	46.58%
KATYES	948	940	851	904	907	907	917	896	94.51%
KATYMS	468	460	358	378	375	374	373	369	78.85%
KWHS	600	320	379	403	404	407	398	395	65.83%
OREMES	948	800	748	831	821	811	779	773	81.54%
OREMMS	468	300	330	350	343	341	333	331	70.73%
WPES	948	940	860	871	890	899	904	901	95.04%
WPMS	468	420	452	399	400	401	402	400	85.47%
WMLKES	948	900	817	872	877	885	894	883	93.14%
WMLKMS	468	300	401	393	400	400	389	384	82.05%
WMLKOHHS	100	0	N/A	61	60	61	58	59	59.00%
Houston	7780	6480	6087	6407	6437	6452	6415	6381	82.02%
District	21,298	18,735	17,388	18,656	18,673	18,689	18,574	18,441	86.59%



INTERNATIONAL LEADERSHIP OF TEXAS

**Authorized Position Report
January 11, 2019**

2018 - 2019 SCHOOL YEAR

Position	# Positions	Positions Filled	Available FTE	New Campus Positions K-8	New Campus Positions HS
AUX - FOOD SERVICE	19	19	0		
AUX - MAINTENANCE	30	28	2		
AUX - TRANSPORTATION	15	15	0		
COUNSELOR	46	46	0		
LIBRARIAN/MEDIA	17	16	1		
NURSE	19	18	1		
PARA - CAMPUS	344	328	16		
PARA - DISTRICT	53	51	2		
PROF - CAMPUS	49	40	9		
PROF - CAMPUS ADMIN	65	65	0		
PROF - DISTRICT	111	101	10		
SLP	13	11	2		
SUPERINTENDENT	1	1	0		
TEACHER	1235.5	1205	30.5		
Total	2017.5	1944	73.5	0	0



INTERNATIONAL LEADERSHIP OF TEXAS

**Faculty and Support Staff New Hires
Subsequent to December 20, 2018
For Board Notification on January 16, 2019**

NEW HIRES FOR THE 2018-2019 SCHOOL YEAR			
Position	Assignment	Building	Start Date
Para - Campus	Instructional Aide	Arlington Elementary	01/07/2019
Prof - District	Coordinator	Garland District Office	01/07/2019
Teacher	Performanc Coach	Garland Elementary	01/07/2019
Prof - District	Instructional Coach	Houston Area Office	01/09/2019
Prof - District	Instructional Coach	Houston Area Office	01/07/2019
Para - Campus	Instructional Aide	Lancaster Elementary	01/09/2019
Teacher	Elementary	North Richland Hill Elementary	01/07/2019
Para - Campus	Instructional Aide	Orem Elementary	01/10/2019
Para - Campus	Instructional Aide	Orem Elementary	01/07/2019
Para - Campus	Instructional Aide	West Park Elementary	01/07/2019
Teacher	Elementary	West Park Elementary	01/10/2019
Prof - Campus	Interventionist	Windmill Lakes Elementary	01/14/2019
Librarian	Librarian	Windmill Lakes Elementary	01/08/2019

All employees are contingent upon Fingerprint and HR Clearance.

Total employees hired as of 1/16/2019: 13

Total Employee Count for 18/19 SY: 1944

Cover Sheet

ILTexas Policy Group 1: Governance

Section: IV. Information Items
Item: F. ILTexas Policy Group 1: Governance
Purpose: FYI
Submitted by:
Related Material: 1 Governance Binder 2019.01.16.pdf

Governance Policy

1st Reading – January 16, 2019

#	Title	Administration Description	Notes
1.1	Charter School Foundations	Specifies the name of the charter holder, the charter school, and defines our geographic border as required by TEA.	
1.2	Board Authority, Roles, and Responsibilities	Specifies roles and responsibilities of the Board. The Board is responsible for implementing the public-school program and ensuring performance of ILTexas students.	Nondelegable duties Delegation amendment
1.3	Board Policy and Administrative Procedures	Defines need for Board policies and their use by the Board to provide management of the charter school. Authorizes the CEO to develop administrative procedures to implement Board policy.	Board Policy is the primary method to adhere to Duty of Care responsibility.
1.4	Orientation and Training	Specifies the required training for ILTexas Board members.	Board training is reported through annual TEA Governance Report and through the Audit.
1.5	Gift Acceptance	Provides guidance to Board, CEO, and Superintendent on acceptance of gifts and procedures for accepting gifts. Based on federal and state law.	
1.6	Public Information Requests	This policy basically repeats state law related to Public Information Requests.	
1.7	Ethics, Conflicts of Interest and Nepotism	Covers Board Ethics, how to deal with conflicts of interest, and nepotism. All these policies are based on state law.	Exhibit A and C are the Annual Conflict of Interest form we ask all Board members and senior level officers to sign.
1.8.1	Board Meetings - General	This policy provides general guidelines related to Board meetings. Most of this is based on state law but is still important for Board members to understand. It includes rules on public participation, notice requirements, requirement that the CEO be allowed to make recommendations before action items, rules for participating by phone and/or video, and other important items for conducting board meetings.	1.8.1.1 states meeting does not include social functions or attendance at conventions. 1.8.1.2 requires the CEO make recommendations.
1.8.2	Board Meetings – Closed	Specifies the reasons for going into closed session and the procedures once you are in closed session.	

#	Title	Administration Description	Notes
1.8.3	Board Meetings – Public Participation	Covers the state and federal laws related to public participation in your meetings. Note Section 1.8.3.3 states you aren't required to create a public forum. However, most schools do allow public comment at their regular meeting but do place limits on that participation. Also, note the required response from the board to any public comment. In short, the board cannot provide ANY decision as a result of public comment.	Areas of board discretion include 1.8.4.1. Currently we limit public comment to 15 minutes total and 3 minutes per speaker.
1.9	School Property	Basically, all property owned by the charter school is "public property for all purposes under state law" and is "held in trust for the benefit of the students of the charter school". This policy becomes even more important given that we now own all our properties, including the student apartments/dorms. The Fiduciary responsibilities listed include the requirement for the Board to "authorize all uses and applications of public property."	The board may want to add a subsection to this policy to deal with our student apartments.
1.10	Public Complaints	Specifies the requirement that we have a procedure for addressing complaints that is protected by both the federal and state constitutions. Note that one of the six nondelegable duties of a Charter School Board is final authority to hear complaints. It includes timelines for filing complaints and procedures for staff to follow when addressing complaints.	This policy includes the procedure we have been using since last spring. There are four "levels" to our process ending with a hearing before the Board of Trustees.
1.11	Records Management	This policy is based solely on state law related to records management and retention.	
1.12	Records Retention Schedule	While this is usually included as an "Exhibit" in most ISD policy manuals; SLHA includes it here as a separate policy.	
1.13	School Visitors	This policy may better reside in one of the other Modules. However, for right now it is in Module 1 and will be recommended as such. It does provide for basic guidelines to govern visitors on our campuses.	We have administrative procedures for school visitors in our Campus Handbooks.

AMERICAN INTERNATIONAL EDUCATION FEDERATION BOARD

MANUAL

POLICY GROUP 1 – GOVERNANCE

CHARTER SCHOOL FOUNDATIONS

PG-1.1

Sec. 5.1.1. School Name.

The official name of the Charter Holder for the open-enrollment charter school is **AMERICAN INTERNATIONAL EDUCATION FEDERATION, INC.**

The official name of the Charter School is **INTERNATIONAL LEADERSHIP OF TEXAS**, which may be referred to throughout the Board Policy Manual as “**ILTEXAS**”.

Sec. 5.1.2. INTERNATIONAL LEADERSHIP OF TEXAS Boundaries.

In accordance with the **INTERNATIONAL LEADERSHIP OF TEXAS** charter on file with the Texas Education Agency, **AMERICAN INTERNATIONAL EDUCATION FEDERATION** is authorized to serve student who reside within the geographical boundaries of the following independent school districts (see the following page):

Note: as of September 6, 2018, the Texas Education Agency charter school geographic boundary data for International Leadership of Texas were available online at the TEA website: http://castro.tea.state.tx.us/charter_apps/production/applications.html.

AMERICAN INTERNATIONAL EDUCATION FEDERATION BOARD

MANUAL

POLICY GROUP 1 – GOVERNANCE

CHARTER SCHOOL FOUNDATIONS

PG-1.1

IL Texas Geographic Boundary as of September 6, 2018

ABBOTT ISD	CYPRESS-FAIRBANKS	KATY ISD	PONDER ISD
ALAMO HEIGHTS ISD	ISD	KELLER ISD	PRINCETON ISD
ALIEF ISD	DALLAS ISD	KENNEDALE ISD	PROSPER ISD
ALLEN ISD	DECATUR ISD	KRUM ISD	RANDOLPH FIELD ISD
ALVARADO ISD	DEER PARK ISD	LA PORTE ISD	RED OAK ISD
ALVIN ISD	DENTON ISD	LA VEGA ISD	RICHARDS ISD
ANDERSON-SHIRO	DESOTO ISD	LACKLAND ISD	RICHARDSON ISD
CISD	DIME BOX ISD	LAKE DALLAS ISD	RIESEL ISD
ANNA ISD	DUNCANVILLE ISD	LAKE WORTH ISD	ROBINSON ISD
AQUILLA ISD	EAGLE MT-SAGINAW	LAMAR CISD	ROCKDALE ISD
ARGYLE ISD	ISD	LANCASTER ISD	ROCKWALL ISD
ARLINGTON ISD	EAST CENTRAL ISD	LEON ISD	ROYAL ISD
AUBREY ISD	EDGEWOOD ISD	LEWISVILLE ISD	ROYSE CITY ISD
AVALON ISD	ENNIS ISD	LEXINGTON ISD	SAN ANTONIO ISD
AXTELL ISD	EVERMAN ISD	LITTLE ELM ISD	SANGER ISD
AZLE ISD	FARMERSVILLE ISD	LORENA ISD	SANTA FE ISD
BIRDVILLE ISD	FERRIS ISD	LOVEJOY ISD	SHELDON ISD
BLUE RIDGE ISD	FORNEY ISD	MADISONVILLE CISD	SNOOK ISD
BLUM ISD	FORT BEND ISD	MAGNOLIA ISD	SOMERSET ISD
BOSQUEVILLE ISD	FORT WORTH ISD	MALONE ISD	SOMERVILLE ISD
BRENHAM ISD	FRANKLIN ISD	MANSFIELD ISD	SOUTH SAN ANTONIO
BRUCEVILLE-EDDY ISD	FRIENDSWOOD ISD	MART ISD	ISD
BRYAN ISD	FRISCO ISD	MAYPEARL ISD	SOUTHSIDE ISD
BURLESON ISD	FT SAM HOUSTON ISD	MCGREGOR ISD	SOUTHWEST ISD
BURTON ISD	GALENA PARK ISD	MCKINNEY ISD	SPRING BRANCH ISD
BYNUM ISD	GALVESTON ISD	MELISSA ISD	STAFFORD MSD
CALDWELL ISD	GARLAND ISD	MESQUITE ISD	SUNNYVALE ISD
CALVERT ISD	GAUSE ISD	MIDLOTHIAN ISD	TERRELL ISD
CAMERON ISD	GHOLSON ISD	MIDWAY ISD	TEXAS CITY ISD
CARROLL ISD	GRAND PRAIRIE ISD	MILANO ISD	THORNDALE ISD
CARROLLTON-	GRAPEVINE-	MILFORD ISD	TOMBALL ISD
FARMERS BRANCH	COLLEYVILLE ISD	MONTGOMERY ISD	WACO ISD
ISD	HALLSBURG ISD	MOODY ISD	WALLER ISD
CASTLEBERRY ISD	HARLANDALE ISD	MOUNT CALM ISD	WAXAHACHIE ISD
CEDAR HILL ISD	HEARNE ISD	MUMFORD ISD	WEST ISD
CELINA ISD	HEMPSTEAD ISD	NAVASOTA ISD	WHITE SETTLEMENT
CHANNELVIEW ISD	HIGHLAND PARK ISD	NEW BRAUNFELS ISD	ISD
CHINA SPRING ISD	HILLSBORO ISD	NORMANGEE ISD	WHITNEY ISD
CLEAR CREEK ISD	HOUSTON ISD	NORTH EAST ISD	WYLIE ISD
COLLEGE STATION ISD	HUBBARD ISD	NORTH ZULCH ISD	WYLIE ISD
COMAL ISD	HUNTSVILLE ISD	NORTHSIDE ISD	[end of list]
COMMUNITY ISD	HURST-EULESS-	NORTHWEST ISD	
CONNALLY ISD	BEDFORD ISD	PALMER ISD	
COPPELL ISD	IOLA ISD	PASADENA ISD	
COVINGTON ISD	IRVING ISD	PEARLAND ISD	
CRANDALL ISD	ITALY ISD	PENELOPE ISD	
CRAWFORD ISD	ITASCA ISD	PILOT POINT ISD	
CROWLEY ISD	JUDSON ISD	PLANO ISD	

DATE ISSUED: FEB 20, 2018

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AMERICAN INTERNATIONAL EDUCATION FEDERATION

BOARD POLICY MANUAL

POLICY GROUP 1 – GOVERNANCE

BOARD AUTHORITY, ROLES, AND RESPONSIBILITIES

PG-1.2

Sec. 1.2.1. Charter School Authority.

ILTEXAS is governed under the governing structure described by its open-enrollment charter.

Sec. 1.2.2. Responsibility for AMERICAN INTERNATIONAL EDUCATION FEDERATION.

a) *Primary Responsibilities*

The Board of Directors of **AMERICAN INTERNATIONAL EDUCATION FEDERATION** (“Board”) has the primary responsibility for:

- (1) Implementing the public-school program authorized by the **AMERICAN INTERNATIONAL EDUCATION FEDERATION** open-enrollment charter; and
- (2) Ensuring the performance of students enrolled in **ILTEXAS** in accordance with the Texas Education Code.

b) *Alienation of Open-Enrollment Charter*

The Board derives its authority to operate **ILTEXAS** schools from the **AMERICAN INTERNATIONAL EDUCATION FEDERATION** open-enrollment charter.

- (1) The Board shall, acting as a body corporate in meetings posted in compliance with Government Code, Chapter 551, oversee the management of all **ILTEXAS** charter schools.
- (2) Except as provided below, the Board’s powers and duties to operate all **ILTEXAS** schools shall not be delegated, transferred, assigned, encumbered, pledged, subcontracted, or in any way alienated by the Board of Directors.
- (3) **AMERICAN INTERNATIONAL EDUCATION FEDERATION** shall notify the Texas Education Agency in writing prior to initiating bankruptcy proceeding respecting the charter holder.
- (4) **Exclusive Method for Delegating Charter Powers and Duties.** Any power or duty of the Board delegated to an officer, employee, contractor, management company, creditor, or any other person shall either be specified in the **AMERICAN INTERNATIONAL EDUCATION FEDERATION** open-enrollment charter or a charter delegation amendment approved by the Texas Education Agency division responsible for charter schools.

c) *Accountability for Delegated Powers and Duties*

The Board remains responsible for the management, operation, and accountability of the **ILTEXAS** charter schools, regardless of whether the Board of Directors delegates any of its powers or duties.

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AMERICAN INTERNATIONAL EDUCATION FEDERATION

BOARD POLICY MANUAL

POLICY GROUP 1 – GOVERNANCE

BOARD AUTHORITY, ROLES, AND RESPONSIBILITIES

PG-1.2

d) *Nondelegable Duties*

Absent specifically approved exceptions granted by the Commissioner of Education, the Board shall not delegate the following duties:

- (1) Final authority to hear or decide employee grievances, citizen complaints, or parental concerns;
- (2) Final authority to adopt or amend the budget of **ILTEXAS**, or to authorize the expenditure or obligation of state funds or the use of public property;
- (3) Final authority to direct the disposition or safekeeping of public records, except that the Board may delegate this function to any person, subject to the Board’s superior right of immediate access to, control over, and possession of such records;
- (4) Final authority to adopt policies governing **ILTEXAS** operations;
- (5) Final authority to approve audit reports under TEC, §44.008(d); and
- (6) Initial or final authority to select, employ, direct, evaluate, renew, non-renew, terminate, or set compensation for the **ILTEXAS** Chief Executive Officer and Superintendent.

AMERICAN INTERNATIONAL EDUCATION FEDERATION**BOARD POLICY MANUAL****POLICY GROUP 1 – GOVERNANCE****BOARD POLICY AND ADMINISTRATIVE PROCEDURES**

PG-1.3

Sec. 1.3.1. Management by Board of Directors.

In accordance with applicable law, the Board of Directors of **AMERICAN INTERNATIONAL EDUCATION FEDERATION** (“Board”) shall manage the affairs of **ILTEXAS**.

Sec. 1.3.2. Management Through Board Policy and Delegation.

The Board shall manage the day-to-day affairs of **ILTEXAS** through authorized delegation and the adoption of policies conforming to applicable law and offering best practices.

Sec. 1.3.3. Oversight of Daily Operations.

The Board’s daily oversight and management of **ILTEXAS** shall be through a chief executive officer. As the Board’s representative, the Chief Executive Officer (CEO) shall oversee and be responsible for the daily implementation of Board adopted policies, plans, budgets and other actions and resolutions. The Board may choose to combine the roles of CEO and Superintendent of Schools. In such case, all policies referencing the CEO will also apply to the Superintendent.

Sec. 1.3.4. Board Policy to Supplement Law and Rules.

The policies adopted by the Board shall not supersede and are not in lieu of the legal requirements set out in state and federal law and rule. Instead, Board policy shall supplement existing legal requirements by providing direction to the CEO and **ILTEXAS** personnel, parents, students and other affected parties in the conduct of the affairs of **ILTEXAS** and in facilitating **ILTEXAS**’s compliance with state and Federal law and rule. In any instance in which Board policy conflicts with state and Federal law or rule, the pertinent legal requirement will govern and control.

Sec. 1.3.5. Policy Development and Adoption.

In collaboration with Board members, **ILTEXAS** personnel, legal counsel, parents, and the public at large, the CEO may develop and propose to the Board policies that address legal requirements and/or best practices. In its sole discretion, the Board may consider and adopt the policy recommended by the CEO. A policy shall be adopted and become effective upon favorable approval by a majority of the Board members present and constituting a quorum at a regular or special meeting of the Board. The Board may adopt a policy with a later effective date if a majority of the Board designates a later adoption.

Sec. 1.3.6. Non-Substantive Edits to Policies.

The CEO may make non-substantive and otherwise inconsequential changes to adopted Board policies to ensure consistency with existing laws and rules (*e.g.*, to include valid legal citations) and **ILTEXAS**’s organizational structure and operations (*e.g.*, to reference appropriate titles and departments). Legal counsel shall review any and all changes to Board policy by the CEO to

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AMERICAN INTERNATIONAL EDUCATION FEDERATION

BOARD POLICY MANUAL

POLICY GROUP 1 – GOVERNANCE

BOARD POLICY AND ADMINISTRATIVE PROCEDURES

PG-1.3

identify edits that alter the intent of the Board. The CEO shall, at the first regular board meeting opportunity, inform the Board of any changes made to policies passed by the Board and shall provide the Board an opportunity through appropriate agenda item to override any changes made.

Sec. 1.3.7. Implementation of Board Policy Through Administrative Procedures.

The CEO or designee shall implement Board policy through administrative procedures which may include but are not limited to the development and adoption of forms, department guides, manuals and/or handbooks. The CEO or designee may consult with **ILTEXAS** personnel, legal counsel or other qualified professionals in the preparation of the administrative procedures.

The CEO or designee may amend administrative procedures as needed in conformance with Board policy and law. Should administrative procedure and policy conflict, policy will prevail except in instances where an administrative procedure has been reviewed and adopted by the Board subsequent to the approval of the underlying and conflicting Board policy.

The CEO or designee shall provide instruction, training, and supervision to **ILTEXAS** personnel in the implementation of Board policy and corresponding administrative procedures and shall ensure that Board policy and administrative procedures are provided and available to School personnel, parents, students and other affected parties.

Sec. 1.3.8. Official Board Policies and Administrative Procedures.

The CEO shall maintain the original and official policies and administrative procedures adopted by the Board and the corresponding administrative procedures approved by the CEO in the central administrative office. In the event that a conflict arises between copies of a Board policy or administrative procedure, the official copy shall prevail as the authoritative record.

Sec. 1.3.9. Accessibility of Policies and Procedures. 

Board policies shall be made accessible to the public at large on the **ILTEXAS** website and at the **ILTEXAS** central administrative office. Administrative procedures shall be made available to the public at large as required by Chapter 551 of the Texas Government Code. Board policies and the administrative procedures implementing Board policy shall be provided and otherwise made readily accessible to all **ILTEXAS** personnel.

Sec. 1.3.10. Campus and Department Procedures.

Individual **ILTEXAS** campuses and departments may develop campus or departmental procedures, guides or manuals implementing and not conflicting with Board policy or administrative procedures.

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Sec. 1.4.1. Orientation.

Newly elected or appointed members to the Board of Directors (“Board”) shall participate in a local orientation session to familiarize the new Board member with the **INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.** organization, the Articles of Incorporation, Bylaws, Board policy, the Texas Education Code and the Texas Administrative Code.

Sec. 1.4.2. Training.

Unless exempted pursuant to applicable law, each new member of the Board must complete an introductory required training course consisting of 12 instructional hours, excluding breaks, administrative tasks, and other non-instructional time, delivered by a registered course provider. The training course may not use self-instructional materials, unless as otherwise provided.

a) *Timeline for Completion*

Each new member of the Board must complete the required training within one calendar year of election or appointment to the Board.

b) *Required Course Content*

The required training shall include nine hours of instruction provided by a Texas Education Agency trainer or other trainer authorized in law, and consist of instruction in:

1. Basic school law;
2. Basic school finance;
3. Health and safety issues;
4. Accountability requirements related to the use of public funds;
5. Other requirements relating to accountability to the public;
6. Open meetings requirements under Texas Government Code, Chapter 551; and
7. Requirements relating to public records.

c) *Additional Required Training*

Each new Board member must also receive an additional three hours of training from any of the modules identified above.

Sec. 1.4.3. Continuing Training.

Each Board member who has completed the 12 hours of required training shall annually thereafter receive six hours of training, excluding breaks, administrative tasks, and other non-instructional time, delivered by a registered course provider delivered by an authorized trainer. Self-instructional continuing training materials may be used in no more than one hour of the required

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continuing training. A Board member may carry over as much as 25 percent of annual continuing training hours earned in excess of the required amount to meet the following year’s training requirements.

Sec. 1.4.4. Exceptions and Exemptions.

The Board may adopt a resolution permitting individual members to meet the prescribed training through an alternate training program as permitted by 19 T.A.C. § 100.1102(h).

Sec. 1.4.5. Record of Compliance.

All Board members, Chief Executive and Central Administrative Officers, Campus Administrative Officers, and Business Managers shall comply with initial and annual training requirements established in law. **INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.** shall document compliance with these requirements.

Sec. 1.4.6. Continued Service

Continued service as a member of the Board or as an Officer is conditioned on satisfaction of the training requirements set forth in 19 T.A.C. §§ 100.1102–.1105.

Sec. 1.4.7. Audit Disclosure

INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC. shall separately disclose, in its annual audit report of its financial and programmatic operations, a member of the Board or Officer who fails to complete the training requirements set forth in 19 T.A.C. §§ 100.1102–.1105 and who continues to serve in such capacity as of the date of the audit report.

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Sec. 1.5.1. Purpose.

As a not-for-profit organization organized under the laws of the State of Texas and exempt as a public charity under Section 501(c)(3) of the Internal Revenue Code, **INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC. (hereinafter abbreviated “I.A.E.F.”)** encourages the solicitation and acceptance of gifts for purposes that will assist **I.A.E.F.** to further and fulfill its mission.

The purpose of this Policy is to govern the acceptance of gifts by **I.A.E.F.** and to provide guidance to the **I.A.E.F.** Board of Directors (the “Board”), the Chief Executive Officer (CEO) and Superintendent of Schools (the “Superintendent”), and prospective donors when making gifts to **I.A.E.F.**. The provisions of this Policy shall apply to all gifts received by **I.A.E.F.** for any of its schools, programs or services, and to the acceptance of gifts made to **I.A.E.F.** or for the benefit of any of its schools or programs.

Sec. 1.5.2. Restrictions on Gifts.

I.A.E.F. will accept unrestricted gifts, and gifts for specific schools, programs and purposes, provided that such gifts are consistent with **I.A.E.F.**’s mission, purposes, and priorities. **I.A.E.F.** will not accept gifts that are too restrictive in purpose. Gifts that are too restrictive are those that violate the charitable and educational trust of **I.A.E.F.**, or that are accompanied by an improper economic benefit to the donor or vest the donor with inappropriate control or influence. The Board shall make all final decisions on the restrictive nature of a gift and its acceptance or refusal.

Sec. 1.5.3. Gift Acceptance Committee.

The Board may establish a Gift Acceptance Committee of the Board to review gifts made to **I.A.E.F.** and to carry out certain terms of this Policy. The Gift Acceptance Committee may be charged with the responsibility of reviewing all gifts made or proposed to be made to **I.A.E.F.**, properly reviewing those gifts, and making recommendations to the Board on gift acceptance and related issues.

Sec. 1.5.4. Use of Legal Counsel and Other Professional Assistance.

I.A.E.F. shall seek the advice of legal counsel or other professional advisors (such as an accountant, financial advisor or professional money manager) when appropriate and as recommended in this Policy relating to the acceptance of certain types of gifts. Generally, **I.A.E.F.** shall seek the advice of legal counsel in all matters pertaining to the acceptance of any gift which may have adverse legal, ethical (including a potential conflict of interest), or other consequence of concern to **I.A.E.F.**.

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All prospective donors shall be urged and encouraged by **I.A.E.F.** to seek and secure the assistance of independent legal, tax and financial advisors in matters relating to their gifts and the resulting tax and estate planning implications. **I.A.E.F.** shall not pay the legal fees or any professional fees of the donor in connection with a gift to **I.A.E.F.**. **I.A.E.F.** shall not provide any opinion, statement or recommendation to the donor as to the tax deductibility of the gift or as to any tax consequences or tax implications of the gift that may affect the donor.

It shall be the responsibility of the donor to secure an appraisal of property where required. The donor shall pay any fees associated with securing such appraisal.

Sec. 1.5.5. Types of Gifts.

The following types of gifts are generally acceptable:

1. Cash Donations
2. Testamentary Bequests
3. Charitable Remainder Trusts
4. Charitable Lead Trusts
5. Tangible Personal Property
6. Oil, Gas and Mineral Interests
7. Life Insurance/Life Insurance Beneficiary Designations
8. Retirement Plan Beneficiary Designations
9. Securities
10. Real Estate

The following types of gifts are generally not acceptable:

1. Charitable gift annuities
2. Pooled income funds

Sec. 1.5.6. Criteria for Certain Types of Gifts.

The criteria below govern the acceptance of each type of gift. Unless indicated otherwise, each type of gift is subject to prior review by the Board and/or the Gift Acceptance Committee.

1. Cash or Cash Equivalents: Cash is acceptable in any form. Checks shall be made payable to “**I.A.E.F.**” or “**INTERNATIONAL LEADERSHIP OF TEXAS**” and shall be delivered to the Chief Financial Officers at the **INTERNATIONAL LEADERSHIP OF TEXAS** administrative office.
2. Charitable Pledge Agreements: Acceptable if payable only in acceptable form as set forth in this Policy. Pledges payable over more than one year shall generally not be acceptable unless at least \$1,000.00.

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3. Securities: Both publicly traded securities and marketable closely held securities are acceptable upon review by Board and/or the Gift Acceptance Committee and legal counsel. Review and recommendation by an outside financial professional or money manager may be sought prior to acceptance of the gift. Marketable securities may be transferred to an account maintained at one or more brokerage firms or delivered physically with the transferor’s signature or stock power attached. As a general rule, **I.A.E.F.** shall promptly sell all securities upon receipt.

4. Closely Held Securities; Other Intangibles: **I.A.E.F.** shall not accept securities and other intangible assets (such as interests in LLPs and LLCs or other ownership forms) that may not be sold or transferred, that have no value, are not marketable, or that may generate additional liability or undesirable tax or other consequences for **I.A.E.F.**. Review and recommendation by legal counsel and/or a financial professional should be sought before making a final decision on acceptance of closely held securities or other intangibles as a gift.

5. Tangible Personal Property: Gifts of tangible personal property are often called “in-kind” gifts and include gifts such as supplies, equipment, furniture, printed materials, books, food, software, motor vehicles and artwork. Gifts of tangible personal property will be examined as follows:
 - a) Will the property be used by **I.A.E.F.** in furtherance of its mission?
 - b) Is the property marketable?
 - c) Are there restrictions on the use, display or disposition of the property?
 - d) Are there carrying costs of the property?

I.A.E.F. shall not value or offer to value the property. The donor shall sign a statement of ownership and disclose any liens on the property. **I.A.E.F.** shall not accept any property subject to a restriction on its ability to use, sell or otherwise dispose of the property as it deems necessary.

6. Life Insurance Policy/Beneficiary Designation: **I.A.E.F.** may accept the gift of a life insurance policy, provided **I.A.E.F.** is named as both the owner of the policy and irrevocable beneficiary of the policy prior to acceptance of the gift. Beneficiary designations shall not be recorded as gifts to **I.A.E.F.** unless and until the gift is irrevocable. Where the gift is irrevocable, but is not due until a future date, the present value of that gift may be recorded at the time the gift becomes irrevocable. If the policy is not fully paid-up and the donor does not continue to make gifts to cover premium payments on the policy, **I.A.E.F.** shall have the right to continue to pay the premiums, convert the policy to paid-up insurance, surrender the policy for its current cash value, or otherwise make use of its value.

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7. Real Estate. **I.A.E.F.** will not accept any real estate subject to a restriction on **I.A.E.F.**'s ability to use, sell or otherwise dispose of or deal with the property as it deems necessary. Prior to the acceptance of real estate, **I.A.E.F.** shall require an initial environmental review of the property by a qualified environmental review firm to ensure that the property has no environmental damage or liabilities. In the event that the initial review reveals a potential problem or concern, the organization may retain a qualified environmental review firm to conduct an environmental audit. The cost of the environmental review and any environmental audit shall be the expense of the donor. Appraisal costs are the responsibility of the donor.

A title report or abstract of title shall be obtained by **I.A.E.F.** prior to the acceptance of the real property gift. Criteria for acceptance of the property shall include:

- a) A review of a complete profile of the property, including the title report and environmental review or audit, inspection reports, the deed, any encumbrances, leases, and tax bills.
 - b) A review of the carrying costs, sale and holding costs of the property, such as insurance, property taxes, mortgages, notes, etc.
 - c) A review of the restrictions, reservations, easements or other limitations on the property.
 - d) A review of the use of the property for **I.A.E.F.**'s purposes.
 - e) A review of a recent appraisal of the property and consultation with a real estate advisor as to marketability of the property.
8. Oil, Gas and Mineral Interests: **I.A.E.F.** may accept oil and gas property interests upon review by Board and/or the Gift Acceptance Committee and legal counsel. The property shall undergo an environmental review by an environmental firm. The property should be reviewed for liabilities or other considerations (such as undesirable tax consequences or valuation issues for working interests) that might make receipt of the gift inappropriate.
 9. Charitable Remainder Trusts: **I.A.E.F.** may accept designation as remainder beneficiary of a charitable remainder trust upon the review by the Board and/or the Gift Acceptance Committee and legal counsel. **I.A.E.F.** will not accept appointment as a trustee of a charitable remainder trust.
 10. Charitable Lead Trusts: **I.A.E.F.** may accept designation as income beneficiary of a charitable lead trust upon review by the Board and/or the Gift Acceptance Committee and legal counsel. **I.A.E.F.** will not accept appointment as trustee of a charitable remainder trust.

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11. Retirement Plan Beneficiary Designations: Donors and supporters of **I.A.E.F.** are encouraged to name **I.A.E.F.** as a beneficiary of a retirement plan. Such designations shall not be recorded as gifts unless and until the gift is irrevocable. When the gift is irrevocable, but is not due until a future date, the present value of that gift may be recorded at the time the gift becomes irrevocable.
12. Bequests: Donors and supporters of **I.A.E.F.** are encouraged to make bequests to **I.A.E.F.** under their wills and trusts. Such bequests will not be recorded as gifts unless and until the gift is irrevocable. When the gift is irrevocable, but is not due until a future date, the present value of that gift may be recorded at the time the gift becomes irrevocable.

Sec. 1.5.7. Acceptance of Gift by the Chief Executive Officer.

Subject to the terms of this Policy, the CEO shall have discretion and authority to accept (i) unrestricted gifts of a value up to \$1,000.00 and (ii) restricted gifts of a value up to \$5,000.00. Only the Board may accept gifts above those amounts.

Sec. 1.5.8. Valuation of Gifts.

I.A.E.F. shall record a gift received by **I.A.E.F.** at its valuation for gift purposes on the date of gift and accordance with GAAP.

Sec. 1.5.9. IRS Filing Upon Sale of Gift.

I.A.E.F. is responsible for filing IRS Form 8282 upon the sale or disposition of any asset sold by **I.A.E.F.** within two years of receipt where the charitable deduction value of the item was \$5,000.00 or greater. **I.A.E.F.** must file such form within 125 days of the date of sale or disposition of the asset. The **I.A.E.F.** Chief Financial Officer shall be responsible for the recordation and filing of this form to the IRS.

Sec. 1.5.10. Written Acknowledgment of Gifts and Contributions.

Written Acknowledgement of all gifts made to **I.A.E.F.** and compliance with the current IRS requirements in acknowledgement of such gifts shall be the responsibility of the Board. The **I.A.E.F.** Chief Financial Officer shall be responsible for ensuring compliance with IRS requirements regarding acknowledgments.

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Sec. 1.5.11. Confidentiality.

I.A.E.F. shall hold all information concerning donors or potential donors in strict confidence, subject to requests for information that **I.A.E.F.** is required by law or court order to provide. **I.A.E.F.** shall not release information about donors or the gift that is not otherwise public information unless permission from the donor is obtained. **I.A.E.F.** will respect the confidentiality of donors who do not wish to be recognized.

Sec. 1.5.12. Review of Policy; Changes to Policy.

The Board shall review this Policy on a periodic basis (but no less than five years) or, if applicable, the Gift Acceptance Committee shall periodically review and recommend changes to this Policy for approval and adoption by the Board.

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Sec. 1.6.1. GENERAL PROVISIONS.

Sec. 1.6.1.1. Public Information Defined.

For purposes of the Texas Public Information Act (“TPIA”), “public information” means information that is written produced, collected, assembled, or maintained under a law or ordinance or in connection with the transaction of official business:

1. By the Board of Directors (“Board”);
2. For the Board and the Board:
 - a. Owns the information;
 - b. Has a right of access to the information; or
 - c. Spends or contributes public money for the purpose of writing, producing, collecting, assembling, or maintaining the information; or
3. By an individual officer or employee of **INTERNATIONAL LEADERSHIP OF TEXAS (hereinafter “ILTexas”) (or its charter holder, INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.)** in the officer’s or employee’s official capacity and the information pertains to official business of ILTexas.

“Official business” means any matter over which ILTexas has any authority, administrative duties, or advisory duties.

Information is “in connection with the transaction of official business” if the information is created by, transmitted to, received by, or maintained by an officer or employee of ILTexas in the officer’s or employee’s official capacity, or a person or entity performing official business or a governmental function on behalf of ILTexas, and pertains to official business of ILTexas.

The definition of “public information” applies to and includes any electronic communication created, transmitted, received, or maintained on any device if the communication is in connection with the transaction of official business.

Sec. 1.6.1.2. Forms of Public Information.

The general forms in which the media containing public information exist include a book, paper, letter, document, e-mail, Internet posting, text message, instant message, other electronic communication, printout, photograph, film, tape, microfiche, microfilm, photostat, sound recording, map, and drawing and a voice, data, or video representation held in computer memory.

The media on which public information is recorded include:

1. Paper;
2. Film;
3. A magnetic, optical, solid state, or other device that can store an electronic signal;

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4. Tape;
5. Mylar; and
6. Any physical material on which information may be recorded, including linen, silk, and vellum.

Sec. 1.6.1.3. Online Message Board.

If the Board maintains an online message board or similar Internet application under Government Code 551.006, and the Board removes from the online message board or similar Internet application a communication that has been posted for at least 30 days, the Board shall maintain the posting for a period of six years. This communication is public information and must be disclosed in accordance with the TPIA.

Sec. 1.6.1.4. Availability of Public Information.

Public information is available to the public, at a minimum, during ILTexas’s normal business hours.

Sec. 1.6.2. OFFICER FOR PUBLIC INFORMATION AND REQUIRED NOTICES.

Sec. 1.6.2.1. Officer for Public Information.

The CEO or designee shall be ILTexas’s officer for public information. Each department head shall be an agent of the officer for purposes of complying with the TPIA.

The officer for public information is responsible for the release of public information as required by the TPIA, Government Code Chapter 552. The officer for public information shall:

1. Make public information available for public inspection and copying.
2. Carefully protect public information from deterioration, alteration, mutilation, loss, or unlawful removal.
3. Repair, renovate, or rebind public information when necessary to maintain it properly.

The officer for public information is not responsible for the use made of the information by the requestor or the release of information after it is removed from a record as a result of an update, correction, or change of status of the person to whom the information pertains.

Sec. 1.6.2.2. Sign.

The officer for public information shall prominently display a sign in the form prescribed by the Attorney General that contains basic information about the rights of a requestor, the responsibilities of ILTexas, and the procedures for inspecting or obtaining a copy of public

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information under the TPIA. The officer for public information shall display the sign at one or more places in the ILTexas administrative offices where it is plainly visible to:

1. Members of the public who request public information in person; and
2. ILTexas employees whose duties include receiving or responding to public information requests.

Sec. 1.6.3. ACCESS TO PUBLIC INFORMATION.

Sec. 1.6.3.1. Access to Public Information.

ILTexas may promulgate reasonable rules of procedure by which public information may be inspected and copied efficiently, safely, and without delay. These rules may not be inconsistent with any provision of the TPIA.

It shall be the policy of ILTexas to provide a suitable copy of public information within a reasonable time after the date on which the copy is requested.

Sec. 1.6.3.2. Treatment of Requests

The officer for public information and agent shall not make an inquiry of a requestor, except to establish proper identification or to ask the requestor to narrow or clarify the request. The officer for public information or agent shall treat all requests for information uniformly without regard to the position or occupation of the requestor, the person on whose behalf the request is made, or the status of the individual as a member of the media. The officer for public information or agent shall give the requestor all reasonable comfort and facility for the full exercise of the right granted by the TPIA.

Sec. 1.6.3.3. Location of Access

An officer for public information complies with a request for public information by:

1. Providing the information for inspection or duplication in ILTexas’s offices (see TIME FOR EXAMINATION, below); or
2. Sending copies of the information by first class mail, if the requestor requests that copies be provided and pays the postage and any other applicable charges that the requestor has accrued under Subchapter F of the TPIA (see COSTS AND CHARGES, below).
3. By referring a requestor to an exact Internet location or uniform resource locator (“URL”) address on a website maintained by ILTexas and accessible to the public if the requested information is identifiable and readily available on that website. If the requestor prefers a manner other than access through the URL, ILTexas must supply the information by sending copies to the requestor, as described above. If the officer for public information provides by e-mail an Internet location or URL address, the e-mail must contain a statement

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in a conspicuous font clearly indicating that the requestor may nonetheless access the requested information by inspection or duplication or by receipt through United States mail, as described above.

The TPIA does not authorize a requestor to remove an original copy of a public record from ILTexas.

Sec. 1.6.3.4. Time for Response.

The officer for public information shall promptly produce public information for inspection, duplication, or both, on application by any person. “Promptly” means as soon as possible under the circumstances, that is, within a reasonable time, without delay.

If the officer for public information cannot produce the public information for inspection or duplication within ten business days after the date the information is requested, the officer shall certify that fact in writing to the requestor and set a date and hour within a reasonable time when the information will be available for inspection or duplication.

If the requested information is unavailable because it is in storage or active use, the officer for public information shall certify this fact in writing to the requestor and set a date and hour within a reasonable time when the information will be available for inspection or duplication.

Sec. 1.6.3.5. Requests to Clarify or Narrow.

If a large amount of information has been requested, ILTexas may discuss with the requestor how the scope of the request might be narrowed, but ILTexas may not inquire into the purpose for which the information will be used. If what information is requested is unclear to ILTexas, ILTexas may ask the requestor to clarify the request.

If the request included the requestor’s physical or mailing address, ILTexas must send the request for discussion or clarification to that address by certified mail. The written request for discussion or clarification must include a statement as to the consequences of failure by the requestor to timely respond. If ILTexas does not receive a written response by the 61st day after ILTexas sends the written request, the underlying request for public information is considered to have been withdrawn by the requestor.

Sec. 1.6.3.6. Time for Examination.

A requestor shall complete the examination of the information not later than the tenth business day after the date the custodian of the information makes it available. If the requestor does not complete the examination within ten business days and does not file a request for additional time, the requestor is considered to have withdrawn the request.

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The officer for public information shall extend the initial examination period by an additional ten business days if, within the initial period, the requestor files with the officer a written request for additional time. The officer shall extend an additional examination period by another ten business days if, within the first additional period, the requestor files with the officer a written request for more additional time.

The time during which a person may examine information may be interrupted by the officer for public information if the information is needed for use by ILTexas. The period of interruption is not considered to be a part of the time during which the person may examine the information.

Sec. 1.6.3.7. Electronic Data.

If public information exists in an electronic or magnetic medium, the requestor may request a copy in an electronic medium, such as on diskette or on magnetic tape. ILTexas shall provide a copy in the requested medium:

1. If ILTexas has the technological ability to produce the information in the requested medium;
2. If ILTexas is not required to purchase any software or hardware to accommodate the request; and
3. Providing the copy will not violate any copyright agreement between ILTexas and a third party.

If ILTexas is unable to comply with a request to produce a copy of information in a requested medium for any of these reasons, ILTexas shall provide a copy in another medium that is acceptable to the requestor. ILTexas is not required to copy information onto a diskette or other material provided by the requestor but may use ILTexas supplies.

Sec. 1.6.3.8. Requests Requiring Programming or Manipulation of Data.

ILTexas shall provide the requestor a written statement, described below, if ILTexas determines:

1. That responding to a request for information will require programming or manipulation of data; and
2. That:
 - a. Compliance with the request is not feasible or will result in substantial interference with operations; or
 - b. The information could be made available in the requested form only at a cost that covers the programming and manipulation of data.

The written statement shall include:

1. A statement that the information is not available in the requested form;

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2. A description of the form in which the information is available;
3. A description of any contract or services that would be required to provide the information in the requested form;
4. A statement of the estimated cost of providing the information in the requested form, as determined in accordance with rules established by the Attorney General; and
5. A statement of the anticipated time required to provide the information in the requested form.

Sec. 1.6.3.8.1. Response Time when Programming or Manipulation is Required

ILTexas shall provide the written statement to the requestor within 20 days after the date ILTexas receives the request. ILTexas has an additional ten days to provide the statement if ILTexas gives written notice to the requestor, within 20 days after receiving the request, that additional time is needed.

Sec. 1.6.3.8.2. Further Action

After providing the written statement described above, ILTexas has no further obligation to provide the information in the requested form or in the form in which it is available, unless within 30 days the requestor states in writing that the requestor:

1. Wants the information in the requested form according to the time and cost parameters set out in the written statement, or according to other terms to which the requestor and ILTexas agree; or
2. Wants the information in the form in which it is available.

If a requestor does not make a timely written statement, the requestor is considered to have withdrawn the request for information.

Sec. 1.6.3.8.3. Processing of Requests

The officer for public information shall establish policies that assure the expeditious and accurate processing of requests for information that require programming or manipulation of data. ILTexas shall maintain a readily accessible file containing all written statements issued concerning requests for information that require programming or manipulation of data.

Sec. 1.6.3.9. Repetitious or Redundant Requests.

If ILTexas determines that a requestor has made a request for information for which ILTexas has previously furnished or made copies available to the requestor, ILTexas may:

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1. Respond to the request for information as set forth below, at PROCEDURES; or
2. Furnish the information or make the information available to the requestor again in accordance with the request. If ILTexas selects this option, ILTexas is not required to comply with the procedures described below.

These provisions do not apply to information not previously furnished to a requestor. ILTexas shall treat a request for information for which copies have not been previously furnished or made available to the requestor, including information that was not furnished or made available because the information was redacted or because the information did not exist at the time of an earlier request, in the same manner as any other request for public information.

Sec. 1.6.3.9.1. Procedures

ILTexas shall, free of charge, certify to the requestor that copies of all or part of the requested information were previously furnished or made available to the requestor. The certification must include:

1. A description of the information for which copies have been previously furnished or made available to the requestor;
2. The date ILTexas received the requestor’s original request for that information;
3. The date ILTexas previously furnished copies or made available copies of the information to the requestor;
4. A certification that no subsequent additions, deletions, or corrections have been made to that information; and
5. The name, title, and signature of the officer for public information or agent making the certification.

Sec. 1.6.4. ATTORNEY GENERAL DECISIONS.

Sec. 1.6.4.1. Attorney General Decisions.

If ILTexas receives a written request for information that ILTexas considers to be within one of the exceptions to required disclosure and that ILTexas wishes to withhold from public disclosure, ILTexas shall request a decision from the Attorney General about whether the information is within the exception (see SUBMISSION TO ATTORNEY GENERAL, below). For these purposes, the term “written request” includes a request sent by electronic mail or facsimile transmission to the officer or designee.

Sec. 1.6.4.2. Time for Request.

ILTexas must submit the request to the Attorney General not later than the tenth business day after receiving the written request. If ILTexas does not timely request a decision from the Attorney General and comply with the requirements at STATEMENT TO REQUESTOR, below, the

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information is presumed to be subject to public disclosure and must be released unless there is a compelling reason to withhold it.

ILTexas may only request an Attorney General opinion if ILTexas reasonably believes that the requested information is excepted from required disclosure.

Sec. 1.6.4.3. Calculating Timelines.

For the purposes of Government Code sections 552.301–.308, if ILTexas receives a written request by United States mail and cannot adequately establish the actual date of receipt, the request is considered to have been received by ILTexas on the third business day after the date of the postmark on a properly addressed request.

Sec. 1.6.4.4. Previous Determinations.

Except as set forth at Government Code section 552.301(g), ILTexas may not request an Attorney General decision if ILTexas has previously requested and received a determination from the Attorney General concerning the precise information at issue in a pending request and the Attorney General or a court determined that the information is not within one of the exceptions. This exception applies to specific information that is again requested from ILTexas after the Attorney General has previously issued a decision regarding the precise information or records at issue.

ILTexas may rely on a previous determination by the Attorney General regarding a specific, clearly delineated category of information if:

1. The previous decision is applicable to a school district or charter school;
2. The previous decision concludes that the category of information is or is not excepted from public disclosure;
3. The elements of law, fact, and circumstances are met to support the previous decision’s conclusion that the requested records and information at issue are not excepted from public disclosure; and
4. The previous decision explicitly provides that the governmental body or bodies to which the decision applies may withhold the information without the necessity of seeking a decision from the Attorney General.

ILTexas shall notify the requestor in writing of the decision or ruling upon which it is relying if it relies on any previous determination to withhold information from disclosure.

ILTexas may withhold from public disclosure the categories of records listed at Texas Attorney General Open Records Decision 684 (2009).

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ILTexas may withhold from public disclosure personally identifiable, non-directory information in “education records” as defined in the Family Educational Rights and Privacy Act of 1974 (“FERPA”).

Sec. 1.6.4.5. Statement to Requestor.

If ILTexas requests an Attorney General decision, it shall provide to the requestor within a reasonable time but not later than the tenth business day after the date of receiving the requestor’s written request:

1. A written statement that ILTexas wishes to withhold the requested information and has asked for a decision from the Attorney General about whether the information is within an exception to public disclosure; and
2. A copy of ILTexas’s written communication to the Attorney General asking for the decision. If ILTexas’s written communication to the Attorney General discloses the requested information, ILTexas shall provide a redacted copy of that written communication.

Sec. 1.6.4.6. Submission to Attorney General.

When ILTexas requests an Attorney General decision, it shall, within a reasonable time but not later than the 15th business day after receiving the request for information, submit to the Attorney General all of the following:

1. Written comments stating the reasons why the stated exceptions apply that would allow the information to be withheld;
2. A copy of the written request for information;
3. A signed statement as to the date on which the written request for information was received by ILTexas or evidence sufficient to establish that date; and
4. A copy of the specific information requested, or representative samples of the information if a voluminous amount of information was requested. ILTexas shall label the copies or representative samples to indicate which exceptions apply to which parts of the copy.

ILTexas shall send a copy of the comments to the requestor not later than the 15th business day after ILTexas receives the written request. If the written comments disclose or contain the substance of the information requested, the copy of the comments provided to the requestor shall be redacted.

Unless the information is confidential by law, ILTexas may disclose the requested information to the public or the requestor before a final determination that the information is public has been made by the Attorney General or a court with jurisdiction.

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Sec. 1.6.4.7. Additional Information.

If the Attorney General determines that additional information is necessary to render a decision, the Attorney General shall give ILTexas and the requestor written notice of that fact. ILTexas shall submit the necessary additional information to the Attorney General not later than the seventh calendar day after the date the notice is received. If ILTexas does not comply with the Attorney General’s request, the information is presumed to be subject to required public disclosure and must be released unless there is a compelling reason to withhold the information.

Sec. 1.6.4.8. Privacy or Property Interests.

If information is requested and a person’s privacy or property interests may be involved, including a case under Government Code 552.101 (information confidential by law), 552.104 (information related to competitive bidding), 552.110 (trade secrets), and 552.114 (student records), ILTexas may decline to release the information for the purpose of requesting a decision from the Attorney General. A person whose interests may be involved, or any other person, may submit in writing to the Attorney General the person’s reasons why the information should be withheld or released. ILTexas may, but is not required to, submit its reasons why the information should be withheld or released.

Sec. 1.6.4.9. Notice to Owner of Proprietary Information.

If release of a person’s proprietary information may be subject to exception under Government Code 552.101 (information confidential by law), 552.110 (trade secrets), 552.113 (geological or geophysical information), or 552.131 (economic development information), ILTexas shall, when requesting an Attorney General decision, make a good faith attempt to provide written notice to that person of its request. The notice must:

1. Be sent within a reasonable time not later than the tenth business day after ILTexas receives the request for information; and
2. Include:
 - a. A copy of any written request ILTexas received for the information; and
 - b. A statement, in the form prescribed by the Attorney General, that the person is entitled to submit to the Attorney General, not later than the tenth business day after the person receives the notice, a written statement of the reason(s) why the information should be withheld and a letter, memorandum, or brief supporting the reason(s).

Sec. 1.6.5. CHARGES REGARDING TPIA REQUESTS.

Sec. 1.6.5.1. Costs and Charges.

The charge for providing a copy of public information shall be an amount that reasonably includes all costs related to reproducing the information, including costs of materials, labor, and overhead.

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The charges shall not be excessive and shall not exceed the actual cost of producing the information or for making public information that exists in a paper record available.

Charges for providing a copy of public information are considered to accrue at the time ILTexas advises the requestor that the copy is available on payment of the applicable charges.

Sec. 1.6.5.1.1. 50 Pages or Fewer

If a request is for 50 or fewer pages of paper records, the charge for providing the copy of the information shall be limited to the charge for each page of the paper record that is photocopied, unless the pages to be photocopied are located in two or more separate buildings that are not physically connected with each other or a remote storage facility. The charge for providing a copy may not include costs of materials, labor, or overhead.

Sec. 1.6.5.1.2. Statement of Labor Costs

If the charge for providing a copy of public information includes costs of labor, the requestor may require the officer for public information or agent to provide the requestor with a written statement as to the amount of time that was required to produce and provide the copy. The statement must be signed by the officer or agent, and the officer or agent’s name must be typed or legibly printed below the signature. A charge may not be imposed for providing the written statement to the requestor.

Sec. 1.6.5.1.3. Attorney General’s Rules

ILTexas shall use the Attorney General’s rules to determine the charges for providing copies of public information and to determine the charge, deposit, or bond required for making public information that exists in a paper record available for inspection, except to the extent that other law provides for charges for specific kinds of public information.

ILTexas may determine its own charges for providing copies of public information and its own charge, deposit, or bond for making public information that exists in a paper record available for inspection. However, ILTexas may not charge an amount that is greater than 25 percent more than the amount established by the Attorney General, unless ILTexas requests an exemption.

Sec. 1.6.5.1.4. Exemptions

ILTexas may request that it be exempt from part or all of the rules adopted by the Attorney General for determining charges. The request must be made in writing to the Attorney General and must state the reason for the exemption. If ILTexas receives notice from the Attorney General that an exemption has been granted, ILTexas may amend its charges according to the Attorney General’s determination.

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Sec. 1.6.5.1.5. Copies for Parents

ILTexas may charge a reasonable fee in accordance with the above requirements for copies of materials provided to parents pursuant to Education Code 26.012.

Sec. 1.6.5.2. Statement of Estimated Charges.

If a request for a copy of public information will result in the imposition of a charge that exceeds \$40, ILTexas shall provide the requestor with a written itemized statement that details all estimated charges that will be imposed, including any allowable charges for labor or personnel costs. If an alternative less costly method of viewing the records is available, the statement must include a notice that the requestor may contact ILTexas regarding the alternative method. ILTexas must inform the requestor of the responsibilities imposed on the requestor by Government Code 552.2615 and the rights granted by that section and give the requestor the information needed to respond as detailed in Government Code 552.2615(a).

If, after ILTexas provides the requestor the itemized statement but before it makes the copy or the paper record available, ILTexas determines that the estimated charges will exceed the charges detailed in the original itemized statement by 20 percent or more, ILTexas shall send to the requestor an updated written itemized statement that details all estimated charges that will be imposed, including any allowable charges for labor or personnel costs.

Sec. 1.6.5.2.1. Requestor’s Response

A request for which ILTexas is required to produce an (original or updated) itemized statement of estimated charges is considered to have been withdrawn if the requestor does not respond in writing to the itemized statement by informing ILTexas within ten business days after the date the statement is sent to the requestor that:

1. The requestor will accept the estimated charges;
2. The requestor is modifying the request in response to the itemized statement; or
3. The requestor has sent to the Attorney General a complaint alleging that the requestor has been overcharged for being provided with a copy of the public information.

Sec. 1.6.5.2.2. Actual Charges

If the actual charges exceed \$40, the charges may not exceed:

1. The amount estimated in the updated itemized statement; or
2. If an updated itemized statement is not sent to the requestor, an amount that exceeds by 20 percent or more the amount estimated in the original itemized statement.

Sec. 1.6.5.2.3. Timing of Deadlines

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An original or updated itemized statement is considered to have been sent by ILTexas, and a requestor is considered to have responded to the statement, on the date that the statement or response is:

1. Delivered in person;
2. Deposited, properly addressed, in the U.S. mail; or
3. Transmitted by electronic mail or facsimile, provided the requestor agrees to receive the statement by those means.

The time deadlines for providing or responding to the required statement of estimated charges do not affect the application of a time deadline imposed on ILTexas for requesting a decision by the Attorney General under Government Code 552, Subchapter G.

Sec. 1.6.5.3. Deposit or Bond.

The officer for public information or agent may require a deposit or bond for payment of anticipated costs for the preparation of a copy of public information if:

1. The officer or agent has provided the requestor with the written itemized statement required by Government Code 552.2615 (see STATEMENT OF ESTIMATED CHARGES, above); and
2. The charge for providing the copy is estimated by ILTexas to exceed \$100, if ILTexas has more than 15 full-time employees, or \$50, if ILTexas has fewer than 16 full-time employees.

The officer or agent may not require a deposit or bond as a down payment for copies of public information that the requestor may request in the future.

For the purposes of charging for providing copies of public information or for requesting an Attorney General’s opinion, a request for a copy of public information is considered to have been received by ILTexas on the date ILTexas receives the deposit or bond.

A requestor who fails to make such a deposit or post such a bond before the tenth business day after the date the deposit or bond is required is considered to have withdrawn the request.

Sec. 1.6.5.3.1. Modified Request

If a requestor modifies a request in response to the requirement of a deposit or bond, the modified request is considered a separate request and is considered received on the date ILTexas receives the written modified request.

Sec. 1.6.5.3.2. Unpaid Amounts

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The officer for public information or agent may require a deposit or bond for payment of unpaid amounts the requestor owes ILTexas in relation to previous public information requests before preparing a copy of public information in response to a new request, if those unpaid amounts exceed \$100. The officer for public information or agent may not seek payment of those unpaid amounts through any other means.

If ILTexas receives a request from a requestor who, within the preceding 180 days, has accepted but failed to pay written itemized statements of estimated charges from ILTexas as provided under Government Code 552.261(b), ILTexas may require the requestor to pay the estimated charges for the request before the request is fulfilled.

Sec. 1.6.5.3.3. Documentation of Unpaid Amounts

ILTexas must fully document the existence and amount of those unpaid amounts or the amount of any anticipated costs before requiring a deposit or bond. The documentation is subject to required public disclosure.

Sec. 1.6.5.3.4. Waivers

ILTexas shall provide a copy of public information without charge or at a reduced charge if ILTexas determines that waiver or reduction of the charge is in the public interest because providing the information primarily benefits the public.

If the cost to ILTexas of processing the collection of a charge for providing a copy of public information will exceed the amount of the charge, ILTexas may waive the charge.

Sec. 1.6.5.4. Government Publications.

The cost provisions described above do not apply to a publication that is compiled and printed by or for ILTexas for public dissemination. If the cost of the publication is not determined by state law, ILTexas may determine the charge for providing the publication, or ILTexas may provide the publication free of charge, if state law does not require a certain charge.

Sec. 1.6.6. INSPECTION OF PUBLIC INFORMATION.

Sec. 1.6.6.1. Inspection of Public Information.

If the requestor does not request a copy of public information, ILTexas may not impose a charge for making available for inspection any public information that exists in a paper record, except as set forth below.

Sec. 1.6.6.1.1. Confidential Information

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If a page contains confidential information that must be edited from the record before the information can be made available for inspection, ILTexas may charge for the cost of making a photocopy of the page from which the confidential information must be edited. No charge other than the cost of the photocopy may be imposed.

Sec. 1.6.6.1.2. Payment, Deposit, or Bond

The officer for public information or agent may require a requestor to pay, or to make a deposit or post a bond for the payment of, anticipated personnel costs for making available for inspection public information that exists in paper records if:

1. The information specifically requested by the requestor is older than five years or completely fills, or when assembled will completely fill, six or more archival boxes; and
2. The officer for public information or agent estimates that more than five hours will be required to make the information available for inspection.

If ILTexas has fewer than 16 full-time employees, the payment, deposit, or bond may be required only if:

1. The information specifically requested by the requestor is older than three years or completely fills, or when assembled will completely fill, three or more archival boxes; and
2. The officer for public information or agent estimates that more than two hours will be required to make the information available for inspection.

Sec. 1.6.6.2. Electronic Records.

If ILTexas receives a request to inspect information that exists in an electronic medium and that is not available directly online to the requestor, ILTexas may not impose a charge for access to the information unless complying with the request will require programming or manipulation of data. If programming or manipulation of data is required, ILTexas shall notify the requestor before assembling the information and provide the requestor with an estimate of charges that will be imposed.

If public information exists in an electronic form on a computer owned or leased by ILTexas, and the public has direct access to that computer through a computer network or other means, the electronic form of the information may be electronically copied from that computer without charge if accessing the information does not require processing, programming, or manipulation on ILTexas’s computer before the information is copied. If such information does require processing, programming, or manipulation before it can be copied, ILTexas may impose charges.

If ILTexas creates or keeps information in an electronic form, ILTexas is encouraged to explore options to separate confidential information from public information and make the public

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information available to the public through electronic access through a computer network or other means.

Sec. 1.6.7. MISCELLANEOUS.

Sec. 1.6.7.1. Limit on Personnel Time for Large or Frequent Requests.

After ILTexas personnel collectively have spent 36 hours of time producing public information for a requestor during the ILTexas fiscal year, ILTexas shall charge the requestor for any additional personnel time spent producing information for the requestor, in accordance with law.

Sec. 1.6.7.1.1. Request by Minor

Any time spent complying with a request submitted in the name of a minor, as defined by Family Code 101.003(a), is to be included in the calculation of the cumulative amount of time spent complying with a request for public information by a parent, guardian, or other person who has control of the minor under a court order and with whom the minor resides, unless that parent, guardian, or other person establishes that another person submitted that request in the name of the minor.

Sec. 1.6.7.1.2. Exception

This section does not apply if the requestor is an individual who, for a substantial portion of the individual’s livelihood or for substantial financial gain, gathers, compiles, prepares, collects, photographs, records, writes, edits, reports, investigates, processes, or publishes news or information for and is seeking the information for:

1. A radio or television broadcast station that holds a broadcast license for an assigned frequency issued by the Federal Communications Commission;
2. A newspaper that is qualified under Government Code 2051.044 to publish legal notices or is a free newspaper of general circulation and that is published at least once a week and available and of interest to the general public in connection with the dissemination of news;
3. A newspaper of general circulation that is published on the Internet by a news medium engaged in the business of disseminating news or information to the general public; or
4. A magazine that is published at least once a week or on the Internet by a news medium engaged in the business of disseminating news or information to the general public.

This section also does not apply if the requestor is an elected official of the United States, this state, or a political subdivision of this state, or a representative of a publicly funded legal services organization that is a federal tax exempt entity under Section 501(c)(3), Internal Revenue Code of 1986.

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Sec. 1.6.7.1.3. Written Statement of Personnel Time

Each time ILTexas complies with a request for public information, ILTexas shall provide the requestor with a written statement of the amount of personnel time spent complying with that request and the cumulative amount of time spent complying with requests for public information from that requestor during the applicable 12-month period. The amount of time spent preparing the written statement may not be included in the amount of time in the statement.

Sec. 1.6.7.1.4. Written Estimate of Charges

If the cumulative amount of personnel time spent complying with requests for public information from the same requestor equals or exceeds the established time limit, ILTexas shall provide the requestor with a written estimate of the total cost, including materials, personnel time, and overhead expenses, necessary to comply with the request. ILTexas shall provide the written estimate on or before the tenth day after the date on which the request was made. The amount of this charge relating to the cost of locating, compiling, and producing the public information shall be established by rules prescribed by the Attorney General.

Sec. 1.6.7.1.5. Additional Time

If ILTexas provides the requestor with written notice that additional time is required to prepare the written estimate, ILTexas must provide the written estimate as soon as practicable, but on or before the tenth day after the date ILTexas provided the notice that additional time was required.

Sec. 1.6.7.1.6. Acceptance of Charges

ILTexas is not required to produce public information for inspection or duplication or to provide copies of public information in response to the requestor’s request unless on or before the tenth day after the date ILTexas provided the written estimate, the requestor submits a written statement to ILTexas in which the requestor commits to pay the lesser of:

1. The actual costs incurred in complying with the request, including the cost of materials, personnel time, and overhead; or
2. The amount stated in the written estimate.

If the requestor fails or refuses to submit a written statement, the requestor is considered to have withdrawn the request.

Sec. 1.6.7.1.7. Waived or Reduced Charges

This section does not prohibit ILTexas from providing a copy of public information without charge or at a reduced rate, or from waiving a charge for providing a copy of public information, under Government Code 552.267 [see WAIVERS, above].

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Sec. 1.6.7.2. Filing Suit to Withhold Information.

ILTexas may file suit seeking to withhold information if ILTexas receives a determination from the Attorney General that information must be disclosed to a requestor. The suit must be filed in Travis County district court against the Attorney General and must seek declaratory relief from compliance with the Attorney General's decision.

ILTexas must bring the suit not later than the 30th calendar day after ILTexas receives the Attorney General's decision. If ILTexas wishes to preserve an affirmative defense for its officer for public information, as provided by Government Code 552.353(b)(3), ILTexas must file suit not later than the tenth calendar day after receipt of the Attorney General's decision.

Sec. 1.6.7.3. Parent's Request for Information.

ILTexas shall comply with a TPIA upon receipt of a request from a parent for public information relating to the parent's child.

If ILTexas seeks to file suit to challenge a decision by the Attorney General in order to withhold information it must bring the suit not later than the 30th calendar day after the date ILTexas receives the decision of the Attorney General, unless an earlier deadline is established by the TPIA.

A court shall grant such a suit precedence over other pending matters to ensure prompt resolution. Notwithstanding any other law, ILTexas may not appeal the decision of the court. This prohibition does not affect the right of a parent to appeal the decision. If ILTexas does not bring suit within the period established, ILTexas shall comply with the decision of the Attorney General.

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Preamble

The Board of Directors (collectively, the “Board” or the “Directors,” and individually a “Director”) of **INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC. (hereinafter “I.A.E.F.”)** is committed to maintaining the highest legal and ethical standards in the conduct of the business of I.A.E.F., and to protecting the integrity and reputation of I.A.E.F., **INTERNATIONAL LEADERSHIP OF TEXAS (hereinafter “ILTexas”)**, the Board, and all ILTexas employees, volunteers, and programs.

The Directors and Officers (as defined below) shall exercise their duties honestly, in good faith, and with a high standard of diligence and care. Accordingly, the Directors and Officers shall ensure that they (1) do not compromise their independence of judgment, (2) preserve confidence and trust in the organization and the Board, and (3) protect and fulfill the mission of I.A.E.F. As such, this Policy will assist Directors and Officers as they identify actual or potential conflicts of interest, and with a procedure to address conflicts which may arise.

Sec. 1.7.1. ETHICAL PRINCIPLES.

Sec. 1.7.1.1. Personal and Professional Integrity.

Directors and Officers shall conduct themselves in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest, as set forth below.

Sec. 1.7.1.2. Financial Stewardship.

As a tax-exempt public charity, I.A.E.F. shall expend funds and record those expenditures in a manner that advances the charitable and educational mission and objectives of I.A.E.F., and not the private interests of Directors or Officers.

Sec. 1.7.1.3. Public Accountability.

I.A.E.F. shall provide comprehensive and timely information in accordance with applicable state and federal law and shall be responsive to reasonable requests for information about its activities. Additionally, informational data about I.A.E.F., such as IRS Form 990, audited financial statements and Annual Financial and Compliance Report, shall be made available to the public in accordance with applicable state and federal law.

Sec. 1.7.1.4. Accuracy and Retention of Records.

I.A.E.F. will create and maintain records that satisfy operational and legal requirements, including federal, state and local laws.

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Sec. 1.7.1.5. Political Activities.

As a 501(c)(3) tax-exempt public charity, I.A.E.F. shall not engage in political activities. Directors and Officers shall not use their relationship with I.A.E.F. to promote or oppose political candidates or parties, or to create the appearance that I.A.E.F. endorses or opposes a political candidate or party for elected office.

Sec. 1.7.1.6. Endorsements and Use of the I.A.E.F. Name and Affiliation.

The I.A.E.F. and ILTexas name, logo, letterhead, or other intellectual property may not be used by any person to endorse or gain support for a cause without prior authorization in writing from the Directors.

Sec. 1.7.1.7. Questions, Concerns or Reports of Violations.

Should a Director or Officer believe a colleague is violating the obligations or expectations of this Policy or is otherwise acting in an illegal or unethical manner, it is his or her duty to report the matter to the President of the Board of Directors, or the Chief Executive Officer, as appropriate.

Sec. 1.7.2. CONFLICTS OF INTEREST.

Sec. 1.7.2.1. Statement on State Law.

ILTexas and its Officers and Directors shall comply with state law governing conflicts of interest among charter school and charter holder board members and officers, as described in Chapter 12 of the Texas Education Code, and 19 TAC §§ 100.1131–100.1135, including, but not limited to the following:

Sec. 1.7.2.1.1. Employees Serving on the Board

- (1) Directors and Officers of ILTexas shall comply with Local Government Code, Chapter 171 in the manner provided by the conflict of interest provisions described in 19 TAC §§ 100.1131–100.1135. (*See below.*)
- (2) Officers of ILTexas are defined by the Commissioner of Education to be persons charged with the duties of, or acting as a Chief Executive Officer, a Central Administration Officer, a Campus Administration Officer, or a Business Manager, regardless of whether the person is an employee or contractor of the charter holder, the school, a management company, or any other person; or a volunteer working under the direction of the charter holder, the school, or a management company. A charter holder employee or independent contractor engaged solely in non-charter activities for the charter holder is not an “officer” of ILTexas.

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- (3) The ILTexas Chief Executive Officer is a person (or persons) directly responsible to the governing body of the charter holder for supervising one or more Central Administration Officers, Campus Administration Officers, and/or Business Managers.
- (4) A Central Administration Officer for ILTexas is a person charged with the duties of, or acting as, a Chief Operating Officer, director, or assistant director of the charter holder for ILTexas, including one or more of the following functions:
 - (A) assuming administrative responsibility and leadership for the planning, operation, supervision, or evaluation of the education programs, services, or facilities of the Board, for appraising the performance of the Board's or ILTexas's staff;
 - (B) assuming administrative authority or responsibility for the assignment or evaluation of any of the personnel of the Board, including those employed by a management company;
 - (C) making recommendations to the Board or ILTexas regarding the selection of personnel of the Board, including those employed by a management company;
 - (D) recommending the termination, non-renewal, or suspension of an employee or officer of the Board, including those employed by a management company; or recommending the termination, non-renewal, suspension, or other action affecting a management contract;
 - (E) managing the day-to-day operations of the Board, as its administrative manager;
 - (F) preparing or submitting a proposed budget to the charter holder Board or ILTexas (except for developing budgets for a ILTexas campus, if this is a function performed by a Campus Administration Officer under the terms of the open-enrollment charter);
 - (G) preparing recommendations for policies to be adopted by the Board, or overseeing the implementation of adopted policies, except for legal services provided by an attorney licensed to practice law in this state, or public accountancy services provided by a certified public accountant licensed to practice public accountancy in this state;
 - (H) developing, or causing to be developed, appropriate administrative regulations to implement policies established by the Board, except for legal services provided by an attorney licensed to practice law in this state, or public accountancy services provided by a certified public accountant licensed to practice public accountancy in this state;
 - (I) providing leadership for the attainment of student performance in ILTexas, based on the indicators adopted under TEC §§ 39.053–39.054, or other indicators in the I.A.E.F. charter; or

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- (J) organizing the central administration of the Board.
- (5) A Campus Administration Officer for ILTexas is a person charged with the duties of, or acting as, a principal or assistant principal of a ILTexas campus, including one or more of the following functions:
 - (A) approving teacher or staff appointments for a ILTexas campus, unless this function is performed by a Central Administration Officer under the terms of the open-enrollment charter;
 - (B) setting specific education objectives for a ILTexas campus, unless this function is performed by a Central Administration Officer under the terms of the open-enrollment charter;
 - (C) developing budgets for a ILTexas campus, unless this function is performed by a Central Administration Officer under the terms of the open-enrollment charter;
 - (D) assuming the administrative responsibility or instructional leadership, under the supervision of a Central Administration Officer, for discipline at a ILTexas campus;
 - (E) assigning, evaluating, or promoting personnel assigned to a ILTexas campus, unless this function is performed by a Central Administration Officer under the terms of the open-enrollment charter; or
 - (F) recommending to a Central Administration Officer the termination or suspension of an employee assigned to a ILTexas campus or recommending the non-renewal of the term contract of such an employee.
- (6) A Business Manager is a person charged with managing the finances of I.A.E.F. or ILTexas.
- (7) **Also Excluded from the Board.** Except as otherwise provided by law, a person who receives “compensation or remuneration” (as defined by law and herein) from the nonprofit corporation holding I.A.E.F.’s open-enrollment charter may not serve on the Board, with the following exceptions:
 - (A) If each charter school operated by the Board as charter holder has received a satisfactory accountability rating, as defined by applicable law, for at least two of the preceding three school years, I.A.E.F. employees may serve on the Board, as described below, and as provided by law.
 - (B) If the charter holder has operated at least one charter school which reported attendance that occurred prior to September 2, 2001, but no charter school operated by the charter holder has received a sufficient number of substantive ratings to determine whether it

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has received a satisfactory rating for at least two of the preceding three school years, then I.A.E.F. employees may serve on the governing body of the charter holder, as provided by law.

- (C) An employee of I.A.E.F. may serve as a Director if: (i) only employees of I.A.E.F., and not employees of the Board, serve on the Board; (ii) the compensation or remuneration received by that Director is limited to salary, bonuses, benefits, or other compensation received pursuant to the employment relationship with I.A.E.F.; (iii) I.A.E.F. employees do not constitute a quorum of the Board or any committee of the Board; and (iv) all I.A.E.F. employees serving on the Board comply with all applicable conflict of interest provisions required by law.

Sec. 1.7.2.1.2. Conflicts Requiring an Affidavit and Abstention from Voting

The following circumstances shall be deemed a Conflict of Interest (as defined below), and the Director or Officer shall, in addition to the procedures set forth in Section 1.7.2.3 (Conflict of Interest Procedures), take the following action:

- (1) If a Director or Officer has a substantial interest in a business entity or in real property, the Director or Officer shall file, before a vote, decision, or other action on any matter involving the business entity or the real property, an affidavit stating the nature and extent of the interest, and shall abstain from further participation in the matter if:
 - (A) In the case of a substantial interest in a business entity, the vote, decision, or other action on the matter will have a special economic effect on the business entity that is distinguishable from the effect on the public; or
 - (B) In the case of a substantial interest in real property, it is reasonably foreseeable that a vote, decision, or other action on the matter will have a special economic effect on the value of the property, distinguishable from its effect on the public.
- (2) The affidavit described above is filed with the Secretary of the Board of Directors.
- (3) The Director or Officer filing the affidavit shall abstain from further participation in the matter requiring the affidavit. A Director or Officer filing the affidavit shall abstain from further participation in the matter requiring the affidavit unless a majority of the Board is composed of persons who are likewise required to file, and who do file affidavits of similar interests on the same official action.

Sec. 1.7.2.1.3. Separate Vote on Budget Item

The Directors shall take a separate vote on any budget item specifically dedicated to a contract with a business entity in which a Director has a substantial interest. Abstention is required, except as provided above and in 19 TAC § 100.1133(c), otherwise the affected Director may not

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participate in that separate vote. The affected Director may vote on a final budget if: (1) the affected Director has complied with the above-stated requirements; and (2) the matter in which the affected Director is concerned has been resolved.

Sec. 1.7.2.2. Statement on Federal Law.

I.A.E.F. and its Officers and Directors shall comply with the federal regulations regarding private benefit and excess benefit transactions as described in Section 4958 of the Internal Revenue Code and 26 CFR § 53.4958 (the “federal tax rules”) when it is contemplating entering into a transaction or arrangement that may benefit the private interest of a Director or Officer or other individual deemed to be a disqualified person under the federal tax rules. A “disqualified person” includes Directors and Officers, and any person who is in a position to exercise substantial influence over the affairs of the corporation. A “disqualified person” includes Family (as defined below) of the disqualified person.

Sec. 1.7.2.2.1. Interested Person

Any Director or Officer, employee, or member of a committee with powers delegated by the Board who has a direct or indirect Interest, as defined below, is an “Interested Person.”

- (1) A person has an “Interest” if the person has, directly or indirectly, through business, investment, or Family:
 - (A) an ownership or investment interest, directly or indirectly, in any entity with which I.A.E.F. has a transaction or arrangement;
 - (B) a compensation arrangement with I.A.E.F., or with any entity or individual with which I.A.E.F. has a transaction or arrangement; or
 - (C) a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which I.A.E.F. is negotiating a transaction or arrangement.
- (2) “Compensation” is defined to include direct and indirect remuneration, as well as gifts or favors that are not insubstantial.
- (3) A person has an “Interest” if the person has a substantial interest in a business entity or a substantial interest in real property as described in Section 1.7.2.1.2 above.

Sec. 1.7.2.2.2. Interested Person with Conflict of Interest

An Interested Person shall have a Conflict of Interest (as defined below) only if the Board or the appropriate committee determines that a Conflict of Interest exists in accordance with the procedures set forth below.

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Sec. 1.7.2.3. Conflict of Interest Procedures

Sec. 1.7.2.3.1. Duty of Prior Disclosure

In connection with any actual or potential conflict of interest, an Interested Person shall disclose the existence of the Interest in writing to the Board as soon as he or she has knowledge of it, and the Board shall give such Interested Person the opportunity to disclose all material facts related thereto to the Board or designated committee considering the proposed transaction or arrangement. Such written disclosure shall be made part of and set forth in the Board minutes. In any event, the disclosure of any actual or potential conflict of interest by an Interested Person should occur prior to any consideration of the proposed transaction by the Board.

- (1) **Transaction Not Subject to Board Action.** An Interested Person with any actual or potential conflict of interest with respect to a transaction or arrangement that is not the subject of Board action shall disclose to the President of the Board or Chief Executive Officer, any such Interest. Such disclosure shall be made as soon as the Interest is known to the Interested Person.
- (2) **Untimely Disclosure.** If an Interested Person fails to disclose the Interest before the Board acts on a transaction as to which a Director has an Interest, then the Interested Person shall promptly submit a written statement to the Board setting forth all material facts regarding the Interest, along with an explanation concerning the untimely nature of the notice.
- (3) **Failure to Disclose.** If the Board has reasonable cause to believe that an Interested Person failed to disclose an Interest, the Board shall inform the Interested Person of the basis for such belief and afford the Interested Person an opportunity to explain the alleged failure to disclose. After hearing the Interested Person’s explanation, and conducting such investigation as may be warranted under the circumstances, the Board may determine that the Interested Person failed to disclose an actual Conflict of Interest. In such event, the Board shall vote on the appropriate corrective action.

Sec. 1.7.2.3.2. Determining Whether a Conflict of Interest Exists

After disclosure of the Interest and all material facts related thereto, the Interested Person *shall leave the meeting of the Board or designated committee while a determination is made by disinterested Directors as to whether a conflict of interest (“Conflict of Interest”) exists.* No Director shall vote on any matter in which he or she has a Conflict of Interest.

Sec. 1.7.2.3.3. Vote by Disinterested Directors

- (1) **Nonparticipation of Directors with Conflict.** A Director who has a Conflict of Interest shall neither vote nor participate in, nor be permitted to hear the Board’s discussion of the matter, except to disclose material facts and to respond to questions. Such Director shall

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not attempt to exert his or her influence with respect to the matter, either before, during, or outside of the Board meeting.

(2) **Action by Disinterested Directors.** If the Board concludes that a Conflict of Interest exists, the Board shall determine by voting whether the transaction should be authorized, approved or ratified. The vote shall be conducted as follows:

(A) Except as otherwise permitted by law, Directors with a Conflict of Interest shall leave the room in which the meeting is conducted.

(B) Except as otherwise allowed by law, and as set forth in Section 1.7.2.1.2(3), a majority of the disinterested Directors, without regard to any quorum requirement, must vote affirmatively for the transaction to be authorized, approved or ratified. However, a transaction cannot be authorized, approved or ratified by a single Director.

(3) **Vote Not Disallowed by Presence of Directors with a Conflict.** The presence of, or a vote cast by, a Director with a Conflict of Interest in a transaction does not affect the validity of a vote regarding the transaction if the transaction is otherwise authorized, approved or ratified, as prescribed herein.

(4) **Circumstances in Which Comparability Data is Necessary.** If the transaction involves compensation for services of a Director, an Officer, or other individual deemed to be a disqualified person (as defined above at page 6(B)) under the federal tax rules, or if the transaction involves the transfer of property or other benefit to a Director, Officer, or other individual deemed to be a disqualified person under the federal tax rules, the disinterested Directors or committee must determine that the value of the economic benefit provided by I.A.E.F. to the Interested Person or Persons does not exceed the value of the consideration received in exchange by obtaining and reviewing appropriate comparable data (“Comparability Data”).

(A) When considering the comparability of compensation for example, the relevant data which the Board or committee may consider includes, but is not limited to, the following: (i) compensation levels paid by similarly-situated schools; (ii) the availability of similar services within the same geographic area; (iii) current compensation surveys compiled by independent firms; and (iv) written offers from similar institutions competing for the same person’s services. When the transaction involves the transfer of real property as compensation, the relevant factors include, but are not limited to: (i) current independent appraisals of the property, and (ii) offers received in a competitive bidding process.

(B) Based on the Comparability Data, the Board or committee shall determine, by a majority vote of the disinterested Directors or committee members, whether the transaction or arrangement is fair and reasonable to I.A.E.F.. In conformity with the

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above determination, the Board or committee shall make its decision as to whether to enter into the transaction or arrangement.

- (C) If such transaction or arrangement is approved by the Board or committee, the Comparability Data and the approval shall be made part of the Board minutes in accordance with Section 1.7.2.3.4 (**Documentation**) below.

Sec. 1.7.2.3.4. Documentation

The Board Secretary shall keep accurate minutes reporting:

- (1) **Interest Disclosed; Determination of Conflict of Interest.** That the Interested Person(s) disclosed the Interest and the Board determined whether a Conflict of Interest exists. The minutes should include:
 - (A) The name(s) of the person(s) who disclosed or otherwise were found to have an Interest in connection with an actual or possible conflict of interest, the nature of the Interest, any action taken to determine whether a Conflict of Interest was present, and the Board’s or committee’s decision as to whether a Conflict of Interest in fact existed.
 - (B) The names of the persons who were present for discussions and votes relating to the Conflict of Interest, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.
 - (C) A completed Affidavit of Abstention complying with Local Government Code Chapter 171 and 19 TAC §§ 100.1131-1134 (*see* Affidavit Exhibit A).
- (2) **Nonparticipation of Directors with Conflict.** That the Director or Directors with an Interest or a Conflict of Interest left the room and did not participate in the determination of whether a Conflict of Interest exists or the vote regarding the transaction or arrangement;
- (3) **Comparability Data.** The Comparability Data considered and relied upon by the Board in its consideration of the transaction or arrangement; and
- (4) **Vote of Disinterested Directors.** That the remaining disinterested Directors reviewed the Transaction and voted upon it, and the result of their vote.

Sec. 1.7.2.4. Compensation.

- (1) A Director who receives compensation, directly or indirectly, from I.A.E.F. for services is precluded from voting on matters pertaining to that Director’s compensation.

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- (2) A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from I.A.E.F. for services is precluded from voting on matters pertaining to that member’s compensation.
- (3) No voting member of the Board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from I.A.E.F., either individually or collectively, is prohibited from providing information to any committee regarding compensation.
- (4) Except with respect to Board decisions regarding a *bona fide* class or category of employees pursuant to Government Code § 573.062(b), a voting member of the Board or any committee whose jurisdiction includes compensation matters is precluded from voting on personnel matters (including matters related to compensation) concerning a person related within the third degree by consanguinity or within the second degree by affinity (as defined below and as specified by Government Code § 573.002).

Sec. 1.7.2.5. Definitions.

The following terms shall have the following meaning:

- (1) **Director or Officer.** A member of the governing body of a charter holder, a member of the governing body of a charter school, or an officer of a charter school. An officer means a person charged with the duties of, or acting as, a Chief Executive Officer, a Central Administration Officer, a Campus Administration Officer, or a Business Manager, regardless of whether the person is an employee or contractor of a charter holder, charter school, management company, or any other person; or a volunteer working under the direction of a charter holder, charter school, or management company. A charter holder employee or independent contractor engaged solely in non-charter activities for the charter holder is not an “officer of a charter school.” 19 TAC §100.1001(16).
- (2) **Business entity.** A sole proprietorship, partnership, firm, corporation, holding company, joint-stock company, receivership, trust, agency, political subdivision, or any other entity recognized by law.
- (3) **Substantial interest in business entity.** A person has a substantial interest in a business entity if: (1) the person owns 10% or more of the voting stock or shares of the business entity or owns either 10% or more or \$15,000 or more of the fair market value of the business entity; or (2) funds received by the person from the business entity exceed 10% of the person’s gross income for the previous year.
- (4) **Substantial interest in real estate.** A person has a substantial interest in real estate, if the interest is an equitable or legal ownership with a fair market value of \$2,500 or more.

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(5) **Substantial interest through a relative or family member.** A Director or Officer is considered to have a substantial interest if a person related to the Director or Officer within the third degree by consanguinity or the third degree by affinity (as defined below) has a substantial interest under **Sec. 1.6.2.5(iii)** above. 19 TAC § 100.1132(d).

(6) **Family.** Family means a disqualified person’s spouse, siblings, spouses of siblings, ancestors, children, grandchildren, great grandchildren, and spouses of children, grandchildren, and great grandchildren.

Sec. 1.7.3. NEPOTISM.

Sec. 1.7.3.1. Nepotism Generally Prohibited.

A Director or Officer may not hire, select, appoint, confirm the appointment of, or vote for the hiring, selection, appointment, or confirmation of an individual who is to be directly or indirectly compensated from public funds or fees of office, if:

- (1) The person is related to the Director or Officer by consanguinity (blood) within the third degree or by affinity (marriage) within the second degree (as defined below); or
- (2) The Director or Officer holds the appointment or confirmation authority as a member of a local board and the person is related to another member of the Board by blood or marriage within a prohibited degree. Government Code §§ 573.002, 573.041.
- (3) Refer to attached diagram, Exhibit B.

Sec. 1.7.3.2. Independent Contractors.

The nepotism law governs the hiring of an individual, whether the individual is hired as an employee or as an independent contractor.

Sec. 1.7.3.3. Payment to Prohibited Person.

A Director or Officer may not approve an account or draw or authorize the drawing of a warrant or order to pay the compensation of an ineligible person if the Director or Officer knows the person is ineligible. Government Code § 573.083; 19 TAC § 100.1116.

Sec. 1.7.3.4. Relation by Consanguinity.

Two persons are related to each other by consanguinity (blood) if one is a descendant of the other or if they share a common ancestor. An adopted child is considered to be a child of the adoptive parents for this purpose. Government Code § 573.022.

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Sec. 1.7.3.5. Third Degree of Consanguinity.

An individual’s relatives within the third degree by consanguinity are the individual’s:

- (1) Parent or child (first degree);
- (2) Brother, sister, grandparent, or grandchild (second degree); and
- (3) Great-grandparent, great-grandchild, aunt or uncle (who is a sibling of a parent of the person), nephew or niece (who is a child of a brother or sister of the person) (third degree).
Government Code 573.023.

Note: There is no distinction under the nepotism statute between half-blood and full-blood relations. Thus, half-blood relationships fall within the same degree as those of the full blood. *See* Exhibit B.

Sec. 1.7.3.6. Relation by Affinity.

Two persons are related to each other by affinity (marriage) if they are married to each other, or if the spouse of one of the persons is related by consanguinity to the other person. The ending of a marriage by divorce, or the death of a spouse ends relationships by affinity created by that marriage unless a child of the marriage is living, in which case the marriage is considered to continue as long as a child of that marriage lives. This provision applies to a Board member or Officer only until the youngest child of the marriage reaches the age of 21 years. Government Code § 573.024.

Sec. 1.7.3.7. First Degree of Affinity.

A husband and wife are related to each other in the first degree by affinity. For other relationships, the degree of affinity is the same as the degree of the underlying relationship by consanguinity. For example, if two persons are related to each other in the second degree by consanguinity, the spouse of one of the persons is related to the other person in the second degree by affinity.

Sec. 1.7.3.8. Second Degree of Affinity.

If two individuals are related to each other in the second degree by consanguinity, the spouse of one of the individuals is related to the other individual in the second degree by affinity.

Sec. 1.7.3.9. Third Degree of Affinity.

An individual’s relatives within the third degree of affinity are:

- (1) Anyone related by consanguinity to the person’s spouse within the first or second degree;
and

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- (2) The spouse of anyone related to the person by consanguinity within the first or second degree. Government Code § 573.025.

Sec. 1.7.3.10. Existing Employees/Continuous Employment.

The nepotism prohibitions do not apply to the appointment of a person to a position if the person is employed in the position immediately before the election or appointment of the Director or Officer to whom the person is related in a prohibited degree, and that prior employment is continuous for at least:

- (1) Thirty days, if the Director or Officer is appointed; or
- (2) Six months, if the Director or Officer is elected. Government Code § 573.062(a).
- (3) A person who was not restricted or prohibited under Education Code 12.1055 as it existed before September 1, 2013, from being employed by I.A.E.F. and who was employed by I.A.E.F. before September 1, 2013, is considered to have been in continuous employment as provided by Government Code § 573.062(a), and is not prohibited from continuing employment with I.A.E.F.. Education Code § 12.1055(d).

Sec. 1.7.3.11. Continuous Employment Exception.

For purposes of calculating the appropriate date for the applicability of the continuous-employment exception, a Superintendent with final authority to select personnel is an appointed director or officer. *Atty. Gen. Op. GA-177 (2004)*. If an employee continues in a position under this exception, the Director or Officer to whom the employee is related in a prohibited degree may not participate in any deliberation or voting on the appointment, reappointment, employment, reemployment, change in status, compensation, or dismissal of the employee, if the action applies only to the employee and is not taken regarding a *bona fide* class or category of employees. Government Code § 573.062(b). A “change in status” includes a reassignment within an organization, whether or not a change in salary level accompanies the reassignment. *Atty. Gen. Op. JC-193 (2000)*. For an action to be “taken with respect to a *bona fide* category of employees,” the officeholder’s action must be based on objective criteria, which do not allow for the preference or discretion of the officeholder. *Atty. Gen. Op. DM-46 (1991)*. The nepotism prohibitions do not apply to appointment or employment of a substitute teacher. Government Code § 573.061.

Sec. 1.7.3.12. Retired Teachers.

A teacher who has retired from a full-time, certified teacher position has broken his or her employment with ILTexas, and does not qualify for the continuous employment exception to the nepotism laws. *Atty. Gen. Op. JC-442 (2001)*.

Sec. 1.7.3.13. Trading Prohibited.

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A Director or Officer may not hire, select, appoint, confirm the appointment of, or vote for the hiring, selection, appointment, or confirmation of an individual to a charter position in which the individual’s services are under the Director or Officer’s direction or control if:

- (1) The person is related to another Director or Officer within the prohibited degree; and
- (2) The appointment would be carried out, in whole or in partial consideration for the other Director or Officer’s hiring, selecting, appointing, confirming, or voting for an individual who is related to the first Director or Officer within a prohibited degree. Government Code § 573.044.

Sec. 1.7.3.14. Source of Funding Irrelevant.

The rules against nepotism apply to employees paid with public funds, regardless of the source of those funds. Thus, the rules apply in the case of a teacher paid with funds from a federal grant. *Atty. Gen. L.A. No. 80 (1974).*

Sec. 1.7.3.15. Nepotism Exceptions.

The nepotism exceptions described in 19 TAC § 100.1115 also apply. Notwithstanding an exception, a Director or Officer related in a prohibited degree may not participate in any deliberation or voting on the appointment, reappointment, or confirmation of same, employment, reemployment, change in status, compensation, or dismissal of an individual, unless the action is taken regarding a *bona fide* class or category of employees.

Sec. 1.7.3.16. Enforcement of Nepotism Prohibitions.

In accordance with state law, a Director or Officer who violates the nepotism regulations shall be removed from office by the Board of Directors. A failure to thus remove is a material charter violation.

- (1) Removal must be in accordance with the Articles and Bylaws of I.A.E.F. and in accordance with the terms of the charter and other state and federal law.
- (2) A Director or Officer violating the nepotism laws may also be removed by the Attorney General and may be subject to criminal and other penalties.

Sec. 1.7.3.17. Delegation of Hiring Authority.

The Board may delegate final authority to select ILTexas personnel to the Chief Executive Officer/Superintendent, Human Resources Director, or other designated Officer.

If such authority is designated to the Chief Executive Officer/Superintendent, the Chief Executive Officer/Superintendent is a “public official” for purposes of Chapter 573, Government Code, with

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respect to a decision made under that delegation of authority. Education Code § 11.1513(f). As such, if the Chief Executive Officer/Superintendent has been delegated final authority to select ILTexas personnel, the Chief Executive Officer/Superintendent may not hire, select, appoint, confirm the appointment of, or vote for the hiring, selection, appointment, or confirmation of an individual who is to be directly or indirectly compensated from public funds or fees of office, if:

- (1) The person is related to the Chief Executive Officer/Superintendent by consanguinity (blood) within the third degree or by affinity (marriage) within the second degree; or
- (2) The person is related to a Board member by blood or marriage within a prohibited degree. Government Code §§ 573.002, 573.041.

An individual who is related to the Chief Executive Officer/Superintendent within the relevant level or consanguinity (blood) or by affinity (marriage) and was employed by ILTexas before September 1, 2013 is considered to have been in continuous employment as provided by Government Code § 573.062(a), and is not prohibited from continuing employment with ILTexas.

Notwithstanding the above, each Director remains subject to Chapter 573, Government Code with respect to all ILTexas employees. Education Code §§ 11.1513(f), 12.1055.

Sec. 1.7.4. CONFIDENTIALITY.

Sec. 1.7.4.1. No Improper Disclosure.

A Director and Officer shall exercise care not to disclose Confidential Information. Confidential Information is information deemed confidential by law, and any information not generally known or publicly available, or that ILTexas maintains as confidential, proprietary, restricted, or otherwise as not to be disclosed generally, and any information that the Board or ILTexas otherwise determines or deems as Confidential Information.

Sec. 1.7.4.2. No Use of Information for Personal Benefit.

A Director shall not use I.A.E.F. property, Confidential Information, or the status of his or her position to solicit business for others, or in any other manner obtain a private financial, social or political benefit.

Sec. 1.7.5. DISCLOSURE AND ANNUAL REVIEW.

Sec. 1.7.5.1. New Directors and Officers.

Each new Director and Officer shall review a copy of this Policy and shall complete the Annual Statement of Disclosure and Compliance attached hereto as Exhibit C.

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Sec. 1.7.5.2. Periodic Review.

To ensure that I.A.E.F. operates in a manner consistent with charitable purposes, and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects: (i) whether compensation arrangements and benefits are reasonable based on competent survey information, and are the result of arm's length bargaining; (ii) whether partnerships, joint ventures, and arrangements with management organizations conform to I.A.E.F.'s written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes, and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

Sec. 1.7.5.3. Annual Review.

Each Director and Officer shall annually complete the Annual Statement of Disclosure and Compliance. The Board shall treat completed Annual Statements of Disclosure and Compliance as Confidential Information.

Sec. 1.7.5.4. Applicable Law.

This Policy is supplemental to and does not replace federal, state or local laws governing conflicts of interest applicable to charter schools and charitable organizations. When in conflict, the applicable law shall control.

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EXHIBIT A

STATE OF TEXAS

§

§

COUNTY OF _____

§

I, _____, a local public official, make this affidavit and hereby under oath state the following:

I have a substantial interest in a business entity or real property that may receive a special economic effect that is distinguishable from the effect on the public by an action contemplated by I.A.E.F..

The business entity or real property in which I have a substantial interest is: [*name and address of business and/or description of property*]:

I or a person that is related to me within the first degree of consanguinity (blood) or affinity (marriage) as defined by state law has a substantial interest in this business entity or real property for the following reasons [*check all that apply*]:

- an ownership interest of 10 percent or more of the voting stock or shares of the business entity;
- an ownership interest of 10 percent or more or \$15,000 or more of the fair market value of the business entity;
- funds received from the business entity exceed 10 percent of _____ (my, his, her) gross income for the previous year;

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real property is involved and _____ (I, he, she) have/has an equitable or legal ownership with a fair market value of at least \$2,500;

Upon filing of this affidavit with the official record keeper of the charter holder for I.A.E.F., I affirm that I shall abstain from voting or further participating in any matter involving the business entity or real property, unless allowed by law.

SIGNED this the _____ day of _____, 20__.

Signature of Affiant

Title

Before me, the undersigned authority, this day personally appeared _____
_____ (Affiant Name) and by oath swore that the facts herein above stated are true and correct to the best of his/her knowledge or belief.

SWORN TO and SUBSCRIBED before me on the _____ day of _____,
20__.

Notary Public, State of Texas

(seal)

My commission expires: _____

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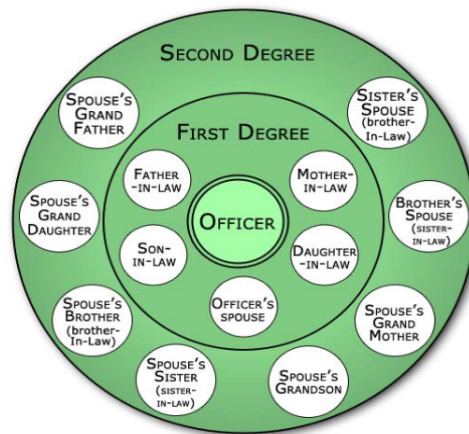
EXHIBIT B

NEPOTISM CHART

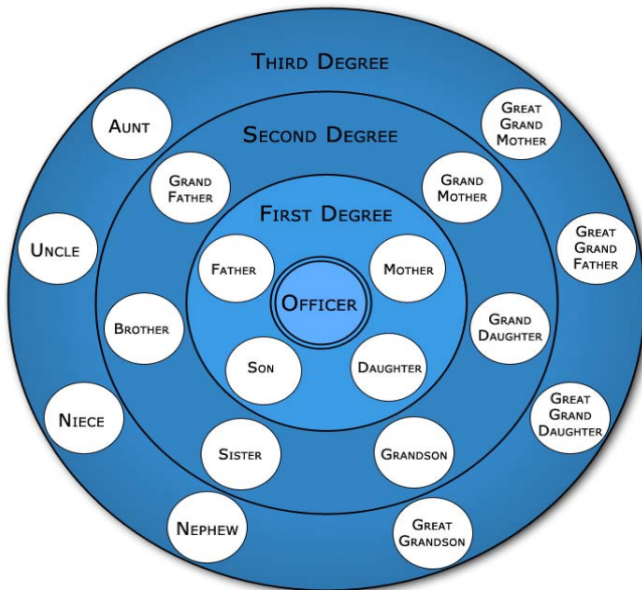
NEPOTISM CHART

The chart below shows

- **Affinity Kinship** (relationship by marriage)
- **Consanguinity Kinship** (relationship by blood) for purposes of interpreting nepotism as defined in VTCA Government Code, Chapter 573, §§573.021 - .025



AFFINITY KINSHIP
Relationship by Marriage



CONSANGUINITY KINSHIP
Relationship by Blood

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EXHIBIT C

ANNUAL STATEMENT OF DISCLOSURE AND COMPLIANCE

Name: _____

Position: _____

- Please describe below any relationships, positions, or circumstances in which you are involved that you believe could be considered an Interest or that might be perceived as an actual or possible Conflict of Interest, as defined in the I.A.E.F. Ethics, Conflict of Interest and Nepotism Policy. Please also describe any familial relationships that would qualify as relationships within the prohibited degree as defined in the I.A.E.F. Ethics, Conflict of Interest and Nepotism Policy.

- I am involved in no activity, relationship, position or circumstance that could be considered an Interest or might be perceived as an actual or possible Conflict of Interest, as defined in the I.A.E.F. Ethics, Conflict of Interest and Nepotism Policy. I do not have any familial relationships that would qualify as relationships within the prohibited degree as defined in the I.A.E.F. Ethics, Conflict of Interest and Nepotism Policy.

I hereby certify that the information as set forth above is true and complete to the best of my knowledge. I have reviewed and agree to abide by the I.A.E.F. Ethics, Conflict of Interest and Nepotism Policy that is currently in effect.

Signature: _____

Date: _____

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Sec. 1.8.1.1. DEFINITIONS.

A. Meeting

“Meeting” means a deliberation among a quorum of the Board, or between a quorum of the Board and another person, during which public business or public policy over which the Board has supervision or control is discussed or considered, or during which the board takes formal action.

“Meeting” also means a gathering:

1. That is conducted by the Board or for which the Board is responsible;
2. At which a quorum of members of the Board is present;
3. That has been called by the Board; and
4. At which Board members receive information from, give information to, ask questions of, or receive questions from any third person, including an employee of **INTERNATIONAL LEADERSHIP OF TEXAS, hereinafter “ILTexas,”** about the public business or public policy over which the Board has supervision or control.

Gov’t Code 551.001(4)

A communication or exchange of information between Board members about public business or public policy over which the Board has supervision or control does not constitute a meeting or deliberation for purposes of the Texas Open Meetings Act if the communication is posted to an online message board or similar Internet application in compliance with Government Code 551.006. *Gov’t Code 551.006.*

The term “meeting” does not include the gathering of a quorum of the Board at a social function unrelated to the public business that is conducted by the Board, or the attendance by a quorum of the Board at a regional, state, or national convention or workshop, ceremonial event, or press conference, if formal action is not taken and any discussion of public business is incidental to the social function, convention, workshop, ceremonial event, or press conference. *Gov’t Code 551.001(4).*

B. Deliberation

“Deliberation means a verbal exchange during a meeting between a quorum of the Board, or between a quorum of the Board and another person, concerning an issue within the jurisdiction of the Board or any public business. *Gov’t Code 551.001(2).*

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C. Recording

Recording” means a tangible medium on which audio or a combination of audio and video is recorded, including a disc, tape, wire, film, electronic storage drive, or other medium now existing or later developed. *Gov’t Code 551.001(7).*

D. Videoconference Call

“Videoconference call” means a communication conducted between two or more persons in which one or more of the participants communicates with the other participants through duplex audio and video signals transmitted over a telephone network, a data network, or the Internet. *Gov’t Code 551.001(8).*

Sec. 1.8.1.2. CHIEF EXECUTIVE OFFICER PARTICIPATION.

The Board shall provide the CEO an opportunity to present at a meeting an oral or written recommendation to the Board on any item that is voted on by the Board at the meeting.

Sec. 1.8.1.3. OPEN TO PUBLIC.

Every Board meeting shall be open to the public. The Board may, however, exclude a witness from a hearing during the examination of another witness in a matter being investigated and may enter into a closed meeting, as provided by law. *Gov’t Code 551.002, .084.*

Sec. 1.8.1.4. RECORDING.

All or any part of an open meeting may be recorded by any person in attendance by means of a recorder, video camera, or other means of aural or visual reproduction.

The Board may adopt reasonable rules to maintain order at a meeting, including rules relating to the location of recording equipment and the manner in which the recording is conducted. These rules may not prevent or unreasonably impair a person from exercising the right to record a meeting that is open to the public. *Gov’t Code 551.023.*

Sec. 1.8.1.5. MINUTES.

The Board shall and keep minutes or make a recording of each open meeting. The minutes shall state the subject matter of each deliberation and indicate each vote, order, decision, or other action taken. *Gov’t Code 551.021.*

The minutes and recording are public records and shall be available for public inspection and copying on request to the CEO or designee. *Gov’t Code 551.022.*

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Sec. 1.8.1.6. NOTICE REQUIRED.

The Board shall give written notice of the date, hour, place, and subject(s) of each Board meeting. Gov't Code 551.041.

If the Board recesses an open meeting to the following regular business day, the Board is not required to post notice of the continued meeting if the action is taken in good faith and not to circumvent Government Code Chapter 551. If an open meeting is continued to the following regular business day and, on that following day, the Board continues the meeting to another day, the Board must give the required written notice of the meeting continued to that other day. *Gov't Code 551.0411(a).*

Sec. 1.8.1.7. INQUIRY DURING MEETING.

If a member of the public or the Board inquires at a meeting about a subject for which notice has not been given, the notice provisions do not apply to a statement of specific factual information given in response to the inquiry or a recitation of existing policy in response to the inquiry. Any deliberation of or decision about the subject of the inquiry shall be limited to a proposal to place the subject on the agenda of a subsequent meeting. *Gov't Code 551.042.*

Sec. 1.8.1.8. TIME OF NOTICE AND ACCESSIBILITY.

Notice of a Board meeting shall be posted on a bulletin board at a place convenient to the public in the ILTexas Central Administration Office for at least 72 hours before the scheduled time of the meeting. That notice or a notice posted at another Board-designated place shall at all times be readily accessible to the public for at least 72 hours before the scheduled time of the meeting. *Gov't Code 551.043(a), .051.*

If ILTexas is required to post notice of a meeting on the Internet, ILTexas satisfies the requirement that the notice must be posted in a place readily accessible to the general public at all times by making a good-faith attempt to continuously post the notice on the Internet during the prescribed period.

ILTexas must still comply with the duty to physically post the notice in the Central Administration Office, and if ILTexas makes a good-faith attempt to continuously post the notice on the Internet during the prescribed period, the physically posted notice must be readily accessible to the general public during normal business hours. *Gov't Code 551.043(b).*

A. Internet Posting

If ILTexas maintains an Internet website, in addition to the other place at which notice is required to be posted, the Board must also concurrently post notice of a meeting on the Internet website.

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If the ILTexas boundaries contain all or part of the area within the corporate boundaries of a municipality with a population of 48,000 or more, the Board must also, concurrently with the notice, post on the ILTexas Internet website the agenda for a Board meeting, if the agenda differs from the posted notice.

The validity of a posting by ILTexas in a good-faith attempt to comply with the Internet posting requirements is not affected by a failure to comply that is due to a technical problem beyond ILTexas’s control. Gov’t Code 551.056.

Sec. 1.8.1.9. SPECIFICITY OF AGENDA/NOTICE.

Agendas for all meetings shall be sufficiently specific to inform the public of the subjects to be deliberated at the meeting, setting out any special or unusual matters to be considered or any matter in which the public has a particular interest. Deliberations or actions pertaining to the Chief Executive Officer, the Superintendent and principals are of particular public interest, and notice of those subjects must be worded with such clarity that the public will understand what the Board proposes to discuss or accomplish.

The terms “employee briefing” or “staff briefing” do not give adequate notice of the subject matter to be presented to the Board by employees or staff members.

The subject of a report or update by ILTexas staff or a Board member must be set out in the notice in a manner that informs a reader about the subjects to be addressed.

Sec. 1.8.1.10. EMERGENCY MEETING OR EMERGENCY AGENDA ADDITIONS.

In an emergency or when there is an urgent public necessity, the notice of a meeting or the supplemental notice of a subject added to an agenda posted in accordance with law is sufficient if it is posted for at least two hours before the meeting is convened.

An emergency or urgent public necessity exists only if immediate action is required because of an imminent threat to public health and safety or a reasonably unforeseeable situation. The Board shall clearly identify the emergency or urgent public necessity for each item in the notice of an emergency meeting and each item added in a supplemental notice.

Sec. 1.8.1.11. CATASTROPHE.

If the Board is prevented from convening an open meeting that was otherwise properly posted under Government Code Section 551.041 because of a catastrophe, the Board may convene the meeting in a convenient location within 72 hours pursuant to Government Code Section 551.045 if the action is taken in good faith and not to circumvent Government Code Chapter 551. If the Board is unable to convene the open meeting within those 72 hours, the Board may subsequently convene the meeting only if the board gives the required written notice of the meeting.

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“Catastrophe” means a condition or occurrence that interferes physically with the ability of the Board to conduct a meeting, including:

1. Fire, flood, earthquake, hurricane, tornado, or wind, rain, or snow storm;
2. Power failure, transportation failure, or interruption of communication facilities;
3. Epidemic; or
4. Riot, civil disturbance, enemy attack, or other actual or threatened act of lawlessness or violence.

Gov’t Code 551.0411(b), (c).

Sec. 1.8.1.12. NOTICE TO NEWS MEDIA.

ILTexas shall provide special notice of each meeting by telephone, facsimile transmission, or electronic mail to any news media that has requested it and agreed to reimburse ILTexas for the cost of providing the special notice. When an emergency meeting is called or an emergency item added to an agenda, the Board President or Board member who calls an emergency meeting or adds an emergency item to the agenda of a meeting shall notify by telephone, facsimile transmission, or electronic mail any news media who have previously requested special notice of all meetings. *Gov’t Code 551.047, .052.*

Sec. 1.8.1.13. QUORUM.

A majority of the Board constitutes a quorum for meetings. *Gov’t Code 551.001(6).*

Sec. 1.8.1.14. SECRET BALLOT.

No vote shall be taken by secret ballot.

Sec. 1.8.1.15. MEETING BY TELEPHONE CONFERENCE CALL.

The Board may hold a meeting by telephone conference call if an emergency or public necessity exists within the meaning of Government Code 551.045 and the convening at one location of a quorum of the Board is difficult or impossible, or if the meeting is held by an advisory board.

Each part of the telephone conference call meeting that is required to be open shall be audible to the public at the location specified in the notice of the meeting. The location designated in the notice as the location of the meeting shall provide two-way communication during the entire telephone conference call meeting and the identification of each party to the telephone conference shall be clearly stated prior to speaking.

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A. Notice

The telephone conference call meeting is subject to the notice requirements applicable to other meetings. The notice must specify as the location of the meeting the location where Board meetings are usually held.

B. Recording

The conference call meeting shall be recorded and made available to the public.

Gov't Code 551.125.

Sec. 1.8.1.16. MEETING BY VIDEOCONFERENCE CALL.

A Board member or ILTexas employee may participate remotely in a Board meeting by means of a videoconference call if the video and audio feed of the Board member's or employee's participation, as applicable, is broadcast live at the meeting and complies with the provisions below. A Board member who participates by videoconference call shall be counted as present at the meeting for all purposes.

A Board meeting may be held by videoconference call only if:

1. The Board makes available to the public at least one suitable physical space located in ILTexas's geographic jurisdiction that is equipped with videoconference equipment that provides an audio and video display, as well as a camera and microphone by which a member of the public can provide testimony or otherwise actively participate in the meeting;
2. The Board member presiding over the meeting is present at the physical space; and
3. Any member of the public present at that physical space is provided the opportunity to participate in the meeting by means of a videoconference call in the same manner as a person who is physically present at a Board meeting that is not conducted by videoconference call.

The location where the presiding officer is physically present shall be open to the public during the open portions of the meeting. *Gov't Code 551.001(7), .127.*

A. Notice

A meeting held by videoconference call is subject to the notice requirements applicable to other meetings in addition to the notice requirements applicable to meetings by videoconference call.

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The notice of a meeting to be held by videoconference call must specify as a location of the meeting the location where the presiding officer will be physically present and specify the intent to have the presiding officer present at that location.

B. Quality of Audio and Video Signals

Each portion of a meeting held by videoconference call that is required to be open to the public shall be visible and audible to the public at the location specified in the notice. If a problem occurs that causes a meeting to no longer be visible and audible to the public at that location, the meeting must be recessed until the problem is resolved. If the problem is not resolved in six hours or less, the meeting must be adjourned.

The physical location specified in the notice, and each remote location from which a member of the board participates, shall have two-way audio and video communication with each member who is participating by videoconference call during the entire meeting. The face of each participant in the videoconference call, while that participant is speaking, shall be clearly visible, and the voice audible, to each other participant and, during the open portion of the meeting, to the members of the public in attendance at the physical location described by the notice and at any other location of the meeting that is open to the public.

The quality of the audio and video signals perceptible at each location of the meeting must meet or exceed standards specified by the Texas Department of Information Resources. The audio and video signals perceptible by members of the public at each location of the meeting described by the notice and at any other location of the meeting that is open to the public must be of sufficient quality so that members of the public at each location can observe the demeanor and hear the voice of each participant in the open portion of the meeting.

C. Recording

The Board shall make at least an audio recording of the meeting. The recording shall be made available to the public.

D. Remote Participation by the Public

The Board may allow a member of the public to testify at a meeting from a remote location by videoconference call even if a Board member is not participating in the meeting from a remote location.

Gov't Code 551.127; 1 TAC 209.10-.11.

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Sec. 1.8.1.17. VIDEO AND AUDIO RECORDING OF MEETING.

If ILTexas has a student enrollment of 10,000 or more, the Board shall make a video and audio recording of reasonable quality of each regularly scheduled open meeting that is not a work session or a special called meeting. In addition, the Board may broadcast a regularly scheduled open meeting on television.

The Board shall make available an archived copy of the video and audio recording on the Internet not later than seven days after the date the recording was made. The Board shall maintain the archived recording on the Internet for not less than two years after the date the recording was first made available. However, the Board is exempt from the requirements in this paragraph if the Board’s failure to make the required recording of a meeting available is the result of a catastrophe, as defined by Government Code 551.0411 (see Catastrophe above), or a technical breakdown. Following a catastrophe or breakdown, the Board must make all reasonable efforts to make the required recording available in a timely manner.

The Board may make the archived recording available on an existing Internet site, including a publicly accessible video-sharing or social networking site. The Board is not required to establish a separate Internet site and provide access to archived recordings of meetings from that site.

If ILTexas maintains an Internet site, ILTexas shall make available on that site, in a conspicuous manner, the archived recording of each meeting or an accessible link to the archived recording of each such meeting. Gov’t Code 551.128(b-1)–(b-6).

Sec. 1.8.1.18. INTERNET BROADCAST.

If ILTexas and the Board are not subject to the provisions above at Video and Audio Recording of Meeting, the Board may broadcast an open meeting over the Internet. If the Board broadcasts a meeting over the Internet, it shall establish an Internet site and provide access to the broadcast from that site. The Board shall provide on the Internet site the same notice of the meeting, within the time required for posting that notice, that the Board is required to post under the Open Meetings Act. Gov’t Code 551.128(b), (c).

Sec. 1.8.1.19. ATTORNEY CONSULTATION.

The Board may use a telephone conference call, videoconference call, or communications over the Internet to conduct a public consultation with its attorney in an open meeting of the Board or a private consultation with its attorney in a closed meeting.

Each part of a public consultation by the Board with its attorney in an open meeting must be audible to the public at the location specified in the notice of the meeting as the location of the meeting.

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Exception: This does not apply to a consultation with an attorney who is an employee of ILTexas. An attorney who receives compensation for legal services performed, from which employment taxes are deducted by ILTexas, is an employee of the ILTexas. *Gov't Code 551.129.*

Sec. 1.8.1.20. HEARING-IMPAIRED PERSONS

In a proceeding before the Board in which the legal rights, duties, or privileges of a party are to be determined by the Board after an adjudicative hearing, the Board shall supply for a party who is deaf or hearing impaired an interpreter who has qualifications approved by the Texas Department of Assistive and Rehabilitative Services.

For purposes of this requirement, “deaf or hearing impaired” means having a hearing impairment, regardless of the existence of a speech impairment, that inhibits comprehension of a proceeding or inhibits communication with others. *Gov't Code 558.001, .003.*

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Sec. 1.8.2.1. EXCEPTIONS TO REQUIREMENT THAT BOARD MEETINGS BE OPEN.

The Board may conduct a closed meeting for the purposes described in Subchapter B, Chapter 551, Texas Government Code, or other applicable including but not limited to:

1. Consultation with the Board’s attorney, in accordance with by Gov’t Code 551.071;
2. Deliberations regarding the purchase, exchange, lease, or value of real property, in accordance with Gov’t Code 551.072;
3. Deliberations regarding a negotiated contract for a prospective gift or donation to **INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.**, in accordance with Gov’t Code 551.073;
4. Deliberations regarding the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of an **INTERNATIONAL LEADERSHIP OF TEXAS (hereinafter “ILTexas”)** officer or employee or to hear a complaint against an ILTexas officer or employee, in accordance with Gov’t Code 551.074;
5. Deliberations in a case in which a complaint or charge is brought against an ILTexas employee by another ILTexas employee and the complaint or charge directly results in the need for a hearing, in accordance with Gov’t Code 551.082;
6. Deliberations in a case involving discipline of an ILTexas student, in accordance with Gov’t Code 551.082;
7. Deliberations in a matter regarding a student if personally identifiable information about the student will necessarily be revealed by the deliberation, in accordance with Gov’t Code 551.0821;
8. Deliberations in matters involving certain information regarding insurance, health, or retirement plans, in accordance with Gov’t Code 551.0785;
9. Deliberations regarding the deployment or specific occasions for implementation of security personnel or devices, or a security audit, in accordance with Gov’t Code 551.076; and
10. Deliberations to discuss or adopt individual assessment instruments or assessment instrument items, in accordance with Education Code 39.030(a).

Sec. 1.8.2.2. PROCEDURES FOR CLOSED MEETINGS.

If a closed meeting is allowed, the Board shall not conduct the closed meeting unless a quorum of the Board first convenes in an open meeting for which proper notice has been given and the presiding officer has publicly announced that a closed meeting will be held and has identified the section or sections of the Open Meetings Act or other applicable law under which the closed meeting is held. *Gov’t Code 551.101.*

Sec. 1.8.2.3. VOTE OR FINAL ACTION.

A final action, decision, or vote on a matter deliberated in a closed meeting shall be made only in an open meeting for which proper notice has been given. *Gov’t Code 551.102.*

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Sec. 1.8.2.4. CERTIFIED AGENDA OR RECORDING.

The Board shall either keep a certified agenda or make a recording of the proceedings of each closed meeting, except for private consultation with the Board and/or ILTexas’s attorney. The certified agenda must include a statement of the subject matter of each deliberation, a record of any further action taken, and an announcement by the presiding officer at the beginning and end of the closed meeting indicating the date and time. A presiding officer shall certify that a certified agenda is a true and correct record of the proceedings. If a recording is made, it must include announcements by the presiding officer at the beginning and end of the meeting indicating the date and time. *Gov’t Code 551.103.*

“Recording” means a tangible medium on which audio or a combination of audio and video is recorded, including a disc, tape, wire, film, electronic storage drive, or other medium now existing or later developed. *Gov’t Code 551.001(7).*

Closed meetings may not be recorded by an individual Board member against the wishes of a majority of the Board.

Preservation: The Board shall preserve the certified agenda or recording of a closed meeting for at least two years after the date of the meeting. If a legal action involving the meeting is brought within that period, the Board shall preserve the certified agenda or recording while the action is pending. *Gov’t Code 551.104(a).*

Public Access: A certified agenda or recording of a closed meeting is available for public inspection and copying only under a court order issued as a result of litigation involving an alleged violation of the Open Meetings Act. *Gov’t Code 551.104(b), (c).*

Sec. 1.8.2.5. PROHIBITIONS.

No Board member shall participate in a closed meeting knowing that neither a certified agenda nor a recording of the closed meeting is being made. *Gov’t Code 551.145.*

No individual, corporation, or partnership shall without lawful authority disclose to a member of the public the certified agenda or recording of a meeting that was lawfully closed to the public. *Gov’t Code 551.146.*

No Board member shall knowingly call or aid in calling or organizing a closed meeting that is not permitted under the Open Meetings Act, close or aid in closing a regular meeting to the public except as permitted under the Open Meetings Act, or participate in a closed meeting that is not permitted under the Open Meetings Act. *Gov’t Code 551.144(a).*

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Affirmative Defense: It is an affirmative defense to prosecution under Government Code 551.144(a) that a Board member acted in reasonable reliance on a court order or a written interpretation of the open meetings law contained in an opinion of a court of record, the attorney general, or the Board’s attorney. *Gov’t Code 551.144(c)*.

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INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.

BOARD POLICY MANUAL

POLICY GROUP 1 – GOVERNANCE

BOARD MEETINGS – PUBLIC PARTICIPATION

PG-1.8.3

Sec. 1.8.3.1. UNITED STATES CONSTITUTION.

INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC. shall take no action abridging the freedom of speech or the right of people to petition the Board for redress of grievances. *U.S. Const. Amend. I, XIV.*

The Board may confine its meetings to specified subject matter, and may hold non-public sessions to transact business. When the Board sits in public meetings to conduct public business and hear the views of citizens, it may not discriminate between speakers on the basis of the content of their speech or the message it conveys. *Rosenberger v. Rector & Visitors of Univ. of Virginia, 515 U.S. 819 (1995); City of Madison v. Wis. Emp. Rel. Comm’n, 429 U.S. 167 (1976); Pickering v. Bd. of Educ., 391 U.S. 563 (1968).*

The Board may create a limited public forum for the purpose of hearing comments from the public, so long as:

1. The Board does not discriminate against speech on the basis of viewpoint;
2. Any restrictions are reasonable in light of the purpose served by the forum; and
3. The Board provides alternative paths for expressing categories of protected speech that are excluded from the forum.

Fairchild v. Liberty Indep. Sch. Dist., 597 F.3d 747 (5th Cir. 2010).

Sec. 1.8.3.2. TEXAS CONSTITUTION.

Citizens shall have the right, in a peaceable manner, to assemble together for their common good and to apply to those invested with the powers of government for redress of grievances or other purposes, by petition, address, or remonstrance. *Tex. Const. Art. I, Sec. 27.*

Sec. 1.8.3.3. PUBLIC COMMENT.

So long as the requirements of the Open Meetings Act are satisfied and the right of citizens to apply to the Board for redress of their grievances is not abridged, the Board need not provide a public forum for every citizen wishing to express an opinion on a matter. Reasonable restraints on the number, length, and frequency of presentations are permissible. The Board may limit the number of persons it will hear on a particular subject and the frequency with which they may appear, so long as the regulation does not abridge constitutionally guaranteed rights of freedom of speech and to petition, nor unfairly discriminate among views seeking expression. *Att’y Gen. Op. H-188 (1973).*

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Sec. 1.8.3.4. LIMIT ON PARTICIPATION.

Audience participation at a Board meeting is limited to the portion of the meeting designated for that purpose. At all other times during a Board meeting, the audience shall not enter into discussion or debate on matters being considered by the Board, unless requested by the presiding officer.

Sec. 1.8.4.1. Public Comment

At regular meetings, the Board shall allot 15 minutes to hear persons who desire to make comments to the Board. Persons who wish to participate in this portion of the meeting shall sign up with the presiding officer or designee before the meeting begins, and shall indicate the topic about which they wish to speak.

Each person who signs up shall be allowed to address the Board one time for no more than 3 minutes. Delegations of more than five persons shall appoint one person to present their views before the Board.

Sec. 1.8.4.2. Board’s Response

Specific factual information or recitation of existing policy may be furnished in response to inquiries, but the Board shall not deliberate or decide regarding any subject that is not included on the agenda posted with notice of the meeting.

Sec. 1.8.3.5. COMPLAINTS AND CONCERNS.

The presiding officer or designee shall determine whether a person addressing the Board has attempted to solve a matter administratively through resolution channels established by policy. If not, the person shall be referred to the appropriate policy (see list below) to seek resolution:

Employee complaints: Board Policy PG-4.6 (Employee Complaints and Grievances – General).

Student or parent complaint: Board Policy PG-3.40 (Parent and Student Complaints and Grievances – General).

Complaints by a student alleging discrimination, harassment, and/or retaliation: Board Policy PG-3.9 (Student Freedom from Discrimination, Harassment, and Retaliation);

Complaints by an employee alleging discrimination, harassment, and/or retaliation: Board Policy PG-4.6 (Employee Freedom from Discrimination, Harassment, and Retaliation); Board Policy PG- (Sexual Harassment).

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Complaints concerning identification, evaluation, or educational placement of a student with a disability within the scope of Section 504: Board Policy PG3.40 (Parent and Student Complaints and Grievances), subject to the time limitations referenced in Board Policy PG-3.3 (Equal Educational Opportunity).

Complaints concerning identification, evaluation, educational placement, or discipline of a student with a disability within the scope of the Individuals with Disabilities Education Act. Board Policy PG-3.2.1 (Equal Educational Opportunity) and Board Policy PG-3.40 (Parent and Student Complaints and Grievances).

Public complaints: Board Policy PG-1.8.3 (Board Meetings), (see Public Complaints).

Sec. 1.8.3.6. DISRUPTION

The Board shall not tolerate disruption of the meeting by members of the audience. If, after at least one warning from the presiding officer, any person continues to disrupt the meeting by his or her words or actions, the presiding officer may request assistance from law enforcement officials to have the person removed from the meeting.

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Sec. 1.9.1. INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.

PROPERTY GENERALLY.

The Board of Directors of **INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC., hereinafter “I.A.E.F.,”** shall be the final authority for authorizing the use of Public Property. I.A.E.F. shall not authorize use or application of public property inconsistent with this policy.

Sec. 1.9.2. PUBLIC PROPERTY DEFINED.

An interest in real estate or personal property acquired, improved, or maintained using state funds that were received by the Board of Directors of I.A.E.F. on or after September 1, 2001, is public property for all purposes under state law. The date on which the property was acquired, improved, or maintained is not determinative. An interest in real estate acquired, improved, or maintained using state funds that were received by the charter holder before September 1, 2001, is public property only to the extent specified by 19 TAC § 100.1065 (relating to Property Acquired with State Funds Received Before September 1, 2001–Special Rules). Where the property is acquired with federal funds, federal law may preempt this Policy and state law in whole or part.

Sec. 1.9.3. FIDUCIARY RESPONSIBILITIES.

Public property is held by the charter holder in trust for the benefit of the students of the charter school. With respect to the public property they manage, the members of the governing body of a charter holder, and the members of the governing body and officers of I.A.E.F., are trustees under Texas law; and the students enrolled in the school are beneficiaries of a trust. Each trustee shall be held to the standard of care and fiduciary duties that a trustee owes the beneficiary of a trust under Texas law.

Public property may be used only for a purpose for which a school district may use school district property, implementing a program described in I.A.E.F.’s open-enrollment charter and only to implement a program that is described in the open-enrollment charter and is consistent with law and Rule.

Notwithstanding the delegation of authority, the Board and officers of the charter school shall remain fully responsible to authorize all uses and applications of public property and to enforce this policy.

Sec. 1.9.4. PERSONAL USE OF PUBLIC PROPERTY.

In compliance with Commissioner of Education Rule, employees of I.A.E.F. and of the charter, **INTERNATIONAL LEADERSHIP OF TEXAS, hereinafter “ILTexas”** shall use I.A.E.F. public property only for purposes described in the I.A.E.F. charter. ILTexas employees may use local telephone service, I.A.E.F.-issued cellular phones, electronic mail, Internet connections, and

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similar property for incidental personal use, provided that such does not, as determined by the ILTexas administration, impede ILTexas functions or, result in direct cost paid with state funds. Should said employee use result in direct cost paid with state funds, ILTexas shall require the employee incurring the cost to reimburse I.A.E.F. for such cost within five (5) business days of ILTexas’s having incurred the costs.

In further compliance with Commissioner Rule, only incidental amounts of employee time, comparable to a five–seven minute coffee break during each day, may be used by employees for such personal matters.

This policy does not authorize incidental personal use of public property for private commercial purposes. Any such incidental use of public property is a privilege not a right, and the ILTexas administration may remove or rescind such privilege from time to time on a case-by-case basis for any employee, or all employees.

Sec. 1.9.5. USE OF PUBLIC PROPERTY REAL ESTATE FOR CHARTER AND NON-CHARTER ACTIVITIES.

Joint use of I.A.E.F.’s public real property for charter and non-charter activities shall be approved by separate vote and recorded in the minutes of the meeting of the Board of Directors of I.A.E.F., setting forth the methodology to be used to allocate shared costs and the percentage allocation basis between charter and non-charter activities.

Sec. 1.9.6. CONTRACT FOR USE OF PUBLIC PROPERTY.

I.A.E.F. may contract for the use of its property for the purpose of providing goods or services under the contract, if such use is an express contract term, factored into the price of the contract, and the contract is one that is authorized by the Board of Directors

Sec. 1.9.7. ACCOUNTING FOR PUBLIC PROPERTY.

I.A.E.F.’s annual audit report shall separately disclose the cost basis and accumulated depreciation of public or privately held or owned property held, acquired, improved, or maintained by I.A.E.F.’s operating Board and charter holder, or provide with the annual audit report a statement that all property acquired, improved, or maintained during the term of I.A.E.F.’s charter, and all property presently held by the charter holder Board, is public property.

Sec. 1.9.8. RETURN OF I.A.E.F. PROPERTY.

Upon separation of employment with ILTexas or cessation of volunteer services, or upon the request of ILTexas, an individual will return to I.A.E.F. all such materials, including copies thereof, in the individual’s possession or under the individual’s control. Such materials will be returned within 24 hours of notice of separation or upon request of ILTexas, whichever comes first.

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The cost of repairing or replacing any supplies, materials, or equipment belonging to I.A.E.F., or other property that is damaged (other than normal wear and tear), stolen, or lost by an employee or that is not returned to I.A.E.F. upon separation of employment may be deducted from the employee's wages, so long as the deduction does not take the employee's pay below minimum wage or, if the employee is a salaried employee, reduce the salary below its predetermined amount.

Any materials created by staff members for use by ILTexas, or created on ILTexas's time, or produced using the staff or resources of ILTexas, are considered works-for-hire and all intellectual property rights are vested exclusively in I.A.E.F.

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POLICY GROUP 1 – GOVERNANCE

PUBLIC COMPLAINTS

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Sec. 1.10.1. UNITED STATES CONSTITUTION.

INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC., hereinafter “I.A.E.F.,” shall take no action abridging the freedom of speech or the right of people to petition the Board for redress of grievances. *U.S. Const. Amend. I, XIV.*

The Board may confine its meetings to specified subject matter and may hold non-public sessions to transact business. When the Board sits in public meetings to conduct public business and hear the views of citizens, it may not discriminate between speakers on the basis of the content of their speech or the message it conveys. *Rosenberger v. Rector & Visitors of Univ. of Virginia, 515 U.S. 819 (1995); City of Madison v. Wis. Emp. Rel. Comm’n, 429 U.S. 167 (1976); Pickering v. Bd. of Educ., 391 U.S. 563 (1968).*

Sec. 1.10.2. TEXAS CONSTITUTION.

Citizens shall have the right, in a peaceable manner, to assemble together for their common good and to apply to those invested with the powers of government for redress of grievances or other purposes, by petition, address, or remonstrance. *Tex. Const. Art. I, Sec. 27.*

Sec. 1.10.3. COMPLAINTS.

In this policy, the “days” shall mean **INTERNATIONAL LEADERSHIP OF TEXAS, hereinafter “ILTexas,”** business days.

Administrators addressing citizen complaints will attempt to resolve these complaints at the lowest possible level. If the administrator addressing the complaint determines that additional time is needed to complete a thorough investigation of the complaint and/or issue a decision, the administrator shall inform the citizen in writing of the necessity to extend the time for investigating or responding and a specific date by when the decision will be issued.

The Board encourages the public to discuss concerns and complaints through informal conferences with the appropriate administrator. Concerns should be expressed as soon as possible to allow early resolution at the lowest possible administrative level.

Sec. 1.10.4. FILING A COMPLAINT.

If an informal conference regarding a complaint fails to reach the outcome requested by an individual, he or she may initiate the formal complaint process by timely filing a written complaint using the ILTexas Level I Grievance Form. This form, which is also used to file an appeal notice, may be requested by telephoning the ILTexas District Office at (972) 479-9078. The Grievance form must be filed in the following manner:

By email, hand-delivery or U.S. Mail to:

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ILTexas
 Attn: CEO or Superintendent
 1820 N. Glenville Drive, Suite 100
 Richardson, TX, 75081

Copies of all documents that support the complaint should be attached to the Grievance form. If the individual does not have copies of these documents, they may be presented at the Level One conference. After the Level One conference, no new documents may be submitted by the individual unless the individual did not know the documents existed before the Level One conference.

An individual may designate a representative through written notice to ILTexas at any level of this process. If the individual designates a representative with fewer than three days’ written notice to ILTexas before a scheduled conference or hearing, ILTexas may reschedule the conference or hearing to a later date. ILTexas may be represented by counsel at any level of the process.

Sec. 1.6.4.1. Level One Complaint.

A complaint must be filed within the later of (1) ten days of the date the individual first knew, or should have known, of the decision or action giving rise to the complaint, or (2) within ten days after the date a letter is mailed to the complainant after completion of the informal grievance process notifying the complainant of the formal grievance process. Complaints must be submitted to I.A.E.F. in the manner described above in “Filing a Complaint.” ILTexas reserves the option of escalating a Level One Grievance to Level Two.

The head of the department most directly involved in the situation that gave rise to the complaint, or the Superintendent’s designee, shall serve as the Level One Administrator. The Level One Administrator will investigate as necessary and hold a conference with the individual within ten days after ILTexas’s receipt of the written complaint. The Level One Administrator may set reasonable time limits for the conference.

The Level One Administrator shall provide the individual with a written response within ten days following the conference. In reaching a decision, the Level One Administrator may consider information provided at the Level One conference and any other relevant documents or information the Level One Administrator believes will help resolve the complaint.

Sec. 1.6.4.2. Level Two Complaint.

If the individual did not receive the relief requested at Level One or if the time for a response has expired, he or she may request a conference with the Superintendent or designee to appeal the Level One decision.

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The appeal notice must be filed, in writing, within ten days of the date of the written Level One decision or, if no response was received, within ten days of the Level One response deadline.

After receiving notice of the appeal, the Level One Administrator shall prepare and forward a record of the Level One complaint to the Superintendent or designee. This record shall include:

1. The original complaint form and any attachments.
2. All other documents submitted by the individual at Level One.
3. The written response issued at Level One and any attachments.
4. All other documents relied upon by the Level One Administrator in reaching the Level One decision.

The Superintendent or the Superintendent’s designee shall serve as the Level Two Administrator. The Level Two Administrator will hold a conference within ten days after the appeal notice is filed. The conference shall be limited to the issues presented by the individual at Level One and identified in the Level Two appeal notice. The Level Two Administrator may set reasonable time limits for the conference.

The Level Two Administrator shall provide the individual a written response within ten days following the conference. In reaching a decision, the Level Two Administrator may consider the Level One record, information provided at the Level Two conference, and any other relevant documents or information the Level Two Administrator believes will help resolve the complaint.

Sec. 1.6.4.3. Level Three Complaint.

If the individual did not receive the relief requested at Level Two or if the time for a response has expired, he or she may request a conference with the Chief Executive Officer or designee to appeal the Level Two decision.

The appeal notice must be filed, in writing, within ten days of the date of the written Level Two decision or, if no response was received, within ten days of the Level Two response deadline.

After receiving notice of the appeal, the Level Two Administrator shall prepare and forward a record of the Level Two appeal to the Chief Executive Officer or designee. This record shall include:

1. All documents submitted, considered, or produced in the Level Two proceeding, including the record of the Level One proceedings that were appealed at the Level Two conference.
2. The written response issued at Level Two and any attachments.
3. Any and all other documents relied upon by the Level Two Administrator in reaching the Level Two decision.

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The Chief Executive Officer or designee shall serve as the Level Three Administrator. The Level Three Administrator will hold a conference within ten days after the appeal notice is filed. The conference shall be limited to the issues presented by the individual at Level Two and identified in the Level Three appeal notice. The Level Three Administrator may set reasonable time limits for the conference.

The Level Three Administrator shall provide the individual a written response within ten days following the conference. In reaching a decision, the Level Three Administrator may consider the Level One and Level Two records, information provided at the Level Three conference, and any other relevant documents or information the Level Three Administrator believes will help resolve the complaint.

Sec. 1.6.4.4. Level Four Complaint.

If the individual did not receive the relief requested at Level Three or if the time for a response has expired, he or she may appeal the decision to the Board.

The appeal notice must be filed, in writing, within ten days of the date of the written Level Three response or, if no response was received, within ten days of the Level Three response deadline.

The Chief Executive Officer or designee shall inform the individual of the date, time, and place of the Board meeting at which the complaint may, at ILTexas’s discretion, be listed as an agenda item or be heard during the “Public Comment” portion of a regular Board meeting. In either event, the Chief Executive Officer or designee shall provide the Board with the record of the Level Three appeal, which shall include:

1. The complete records of Levels One through Three, including all notices, all written responses, and all attachments.
2. Any and all other documents relied upon by the administration in reaching the Level Three decision.

If the Level Four hearing is listed on the agenda, ILTexas shall determine whether the complaint will be presented in open or closed meeting in accordance with the Texas Open Meetings Act and other applicable law.

If the Level Four hearing is listed on the agenda, the presiding officer may set reasonable time limits and guidelines for the presentation, including an opportunity for the individual and administration to each make a presentation and provide rebuttal and an opportunity for questioning by the Board. The Board shall hear the complaint and may request that the administration provide an explanation for the decisions at the preceding levels.

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If the Level Four hearing is listed on the agenda, the Board shall then consider the complaint. The Board may give notice of decision orally or in writing at any time up to and including the next regularly scheduled Board meeting.

If the complaint is heard through Public Comment, the Board may make inquiries of the complainant but shall not deliberate or take action on the complaint. The Board, may, at its discretion, choose to consider the complaint as an action item at a subsequent meeting.

The Board is I.A.E.F.’s final authority to hear or decide citizen complaints. *19 Tex. Admin. Code § 100.1033(13)(C)(i)*. Failure of the Board to take action on the complaint or schedule a complaint offered at Public Comments on a future agenda indicates the Board’s approval of the decision below.

Sec. 1.10.5. RESPONSE TO COMPLAINTS.

There is no requirement that the Board negotiate or even respond to complaints. However, the Board must stop, look, and listen and must consider the petition, address, or remonstrance. *Prof’l Ass’n of Coll. Educators v. El Paso Cmty. Coll. Dist., 678 S.W.2d 94 (Tex. App.—El Paso 1984, writ ref’d n.r.e.)*

The process described in this policy shall not be construed to create new or additional rights beyond those granted by law or Board policy, nor to require a full evidentiary hearing or “mini-trial” at any level.

Sec. 1.10.6. CONSOLIDATING COMPLAINTS.

Complaints arising out of an event or a series of related events shall be addressed in one complaint. ILTexas may consolidate separate or serial complaints that have been or could have been addressed in a previous complaint.

Sec. 1.10.7. UNTIMELY FILINGS.

If a written complaint or appeal notice is not timely filed, the complaint may be dismissed, on written notice to the individual, at any point during the compliant process. The individual may appeal the dismissal by seeking review in writing within ten days from the date of the written dismissal notice, starting at the level at which the complaint was dismissed. Such appeal shall be limited to the issue of timeliness.

Sec. 1.10.8. FREEDOM FROM RETALIATION.

Neither the Board nor any ILTexas employee shall unlawfully retaliate against any individual for bringing a concern or complaint.

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RECORDS MANAGEMENT

PG-1.11

Sec. 1.11.1. DEFINITIONS.

A. “Records” means all documents, papers, letters, books, maps, photographs, sound or video recordings, microfilm, magnetic tape, electronic media, or other recording media, regardless of physical form or characteristic, and regardless of whether public access to it is open or restricted under the laws of the state, created or received by **INTERNATIONAL LEADERSHIP OF TEXAS (hereinafter “ILTexas”)**, or any of its officers or employees pursuant to law or in the transaction of public business, are hereby declared to be the records of ILTexas and shall be created, maintained, and disposed of in accordance with the provisions of this ordinance or procedures authorized by it and in no other manner.

The term “records” does not include: (i) Convenience copies, or extra identical copies of documents created only for convenience of reference or research; copies of documents furnished to the public (to fulfill a Public Information Act request); (iii) blank forms/stocks of publications; or (iv) library or museum materials.

B. “Essential record” means any record of ILTexas necessary to the resumption or continuation of operations of ILTexas in an emergency or disaster, to the recreation of the legal and financial status of ILTexas, or to the protection and fulfillment of obligations to the people of the state.

C. “Records management” means the application of management techniques to the creation, use, maintenance, retention, preservation, and disposal of records for the purposes of reducing the costs and improving the efficiency of record keeping. The term includes the development of records control schedules, the management of filing and information retrieval systems, the protection of essential and permanent records, the economical and space-effective storage of inactive records, control over the creation and distribution of forms, reports, and correspondence, and the management of micrographic and electronic and other records storage systems.

D. “Records Liaison Officers” means the persons designated under Section 1.11.9 of this policy.

E. “Records Management Committee” means the committee established under Section 1.11.5 of this policy.

F. “Records Management Officer” means the person designated in Section 1.11.4 of this policy.

G. “Records management plan” means the plan developed under Section 1.11.6 of this policy.

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Sec. 1.11.2. RECORDS DECLARED PUBLIC PROPERTY.

All records as defined in Section 1.11.1(A) of this policy are hereby declared to be the property of ILTexas. No official or employee of ILTexas has, by virtue of his or her position, any personal or property right to such records, even though he or she may have developed or compiled them. The unauthorized destruction, removal from files, or use of such records is prohibited.

Sec. 1.11.3. POLICY.

It is hereby declared to be the policy of ILTexas to provide for efficient, economical, and effective controls over the creation, distribution, organization, maintenance, use, and disposition of all records of this office through a comprehensive system of integrated procedures for the management of records from their creation to their ultimate disposition, consistent with the requirements of the Local Government Records Act and accepted records management practice.

Sec. 1.11.4. RECORDS MANAGEMENT OFFICER.

The Chief Administrative Officer will serve as Records Management Officer for ILTexas as provided by law, and will ensure that the maintenance, destruction, electronic storage, or other disposition of the records of this office are carried out in accordance with the requirements of the Local Government Records Act.

Sec. 1.11.5. ESTABLISHMENT OF RECORDS MANAGEMENT COMMITTEE; DUTIES.

The Records Management Officer, in consultation with the Chief Executive Officer, shall appoint a Records Management Committee consisting of:

- A financial officer for ILTexas; and
- An executive or administrative officer for ILTexas

The committee shall:

- a. Assist the Records Management Officer in the development of policies and procedures governing the records management program;
- b. Review the performance of the program on a regular basis and propose changes and improvements if needed;
- c. Review and approve records control schedules submitted by the Records Management Officer;
- d. Give final approval to the destruction of records in accordance with approved records control schedules; and

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- e. Actively support and promote the records management program throughout ILTexas.

Sec. 1.11.6. RECORDS MANAGEMENT PLAN TO BE DEVELOPED; APPROVAL OF PLAN; AUTHORITY OF PLAN.

The Records Management Officer and the Records Management Committee shall develop a records management plan for ILTexas to be submitted to the Board. The plan must contain policies and procedures designed to reduce the costs and improve the efficiency of record keeping, to adequately protect the essential records of ILTexas, and to properly preserve those records of ILTexas that are of historical value. The plan must be designed to enable the Records Management Officer to carry out his or her duties prescribed by state law and this policy effectively.

Once approved by the Board, the records management plan shall be binding on all offices, departments, divisions, programs, commissions, bureaus, boards, committees, or similar entities of ILTexas, and records shall be created, maintained, stored, microfilmed, or disposed of in accordance with the plan.

Sec. 1.11.7. DUTIES OF RECORDS MANAGEMENT OFFICER.

In addition to other duties assigned in this policy, the Records Management Officer shall:

- a. Administer the records management program and provide assistance to department heads in its implementation;
- b. Plan, formulate, and prescribe records disposition policies, systems, standards, and procedures;
- c. In cooperation with principals and department heads, identify essential records and establish a disaster plan for each ILTexas campus and department to ensure maximum availability of the records in order to re-establish operations quickly and with minimum disruption and expense;
- d. Develop procedures to ensure the permanent preservation of the historically valuable records of ILTexas;
- e. Establish standards for filing and storage equipment and for record keeping supplies;
- f. Study the feasibility of and, if appropriate, establish a uniform filing system and a forms design and control system for ILTexas;
- g. Provide records management advice and assistance to all ILTexas departments by preparing a manual or manuals of procedure and policy and by on-site consultation;

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- h. Monitor records retention schedules and administrative rules issued by the Texas State Library and Archives Commission to determine if the records management program and ILTexas's records control schedules are in compliance with state regulations;
- i. Disseminate to the Board, department heads, and principal's information concerning state laws and administrative rules relating to local government records;
- j. Instruct Records Liaison Officers and other personnel in policies and procedures of the records management plan and their duties in the records management program;
- k. Direct Records Liaison Officers or other personnel in the conduct of records inventories in preparation for the development of records control schedules as required by state law and this policy;
- l. Ensure that the maintenance, preservation, microfilming, destruction, or other disposition of ILTexas records is carried out in accordance with the policies and procedures of the records management program and the requirements of state law;
- m. Maintain records on the volume of records destroyed under approved records -- control schedules, the volume of records microfilmed or stored electronically, and the estimated cost and space savings as the result of such disposal or disposition;
- n. Report annually to the Chief Executive Officer on the implementation of the records management plan in each department of ILTexas; and
- o. Bring to the attention of the Chief Executive Officer non-compliance by department heads, principals, or other ILTexas personnel with the policies and procedures of the records management program or the Local Government Records Act.

Sec. 1.11.8. DUTIES AND RESPONSIBILITIES OF DEPARTMENT HEADS AND PRINCIPALS.

In addition to other duties assigned in this policy, department heads and principals shall:

- a. Cooperate with the Records Management Officer in carrying out the policies and procedures established by ILTexas for the efficient and economical management of records and in carrying out the requirements of this policy;
- b. Adequately document the transaction of government business and the services, programs, and duties for which the department head, principal, and his or her staff are responsible; and

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- c. Maintain the records in his or her care and carry out their preservation, microfilming, destruction, or other disposition only in accordance with the policies and procedures of the records management program of ILTexas and the requirements of this policy.

Sec. 1.11.9. DESIGNATION OF RECORDS LIAISON OFFICERS.

Each department head and principal shall designate a member of his or her staff to serve as a Records Liaison Officer for the implementation of the records management program in the department and/or campus.

If the Records Management Officer determines that in the best interests of the records management program more than one Records Liaison Officer should be designated for a department or campus, the department head or principal shall designate the number of Records Liaison Officers specified by the Records Management Officer.

Persons designated as Records Liaison Officers shall be thoroughly familiar with all records created and maintained by the department.

In the event of the resignation, retirement, dismissal, or removal by action of the department head or principal of a person designated as a Records Liaison Officer, the department head or principal shall promptly designate another person to fill the vacancy.

A department head or principal may serve as Records Liaison Officer for his or her department or campus.

Sec. 1.11.10. DUTIES AND RESPONSIBILITIES OF RECORDS LIAISON OFFICERS.

In addition to other duties assigned in this policy, Records Liaison Officers shall:

- a. Conduct or supervise the conduct of inventories of the records of the department in preparation for the development of records control schedules;
- b. In cooperation with the Records Management Officer, coordinate and implement the policies and procedures of the records management program in their department; and
- c. Disseminate information to department staff concerning the records management program.

Sec. 1.11.11. RECORDS CONTROL SCHEDULES TO BE DEVELOPED; APPROVAL; FILING WITH STATE.

- a. The Records Management Officer, in cooperation with department heads, principals, and Records Liaison Officers, shall prepare records control schedules on a department by department basis, listing all records created or received by the department and the retention

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period for each record. Records control schedules shall also contain such other information regarding the disposition of ILTexas records as the records management plan may require.

- b. Each records control schedule shall be monitored and amended as needed by the Records Management Officer on a regular basis to ensure that it is in compliance with records retention schedules issued by the state, and that it continues to reflect the record keeping procedures and needs of the department and the records management program of ILTexas.
- c. Before its adoption, a records control schedule or amended schedule for a department must be approved by the department head or principal and the members of the Records Management Committee.
- d. Before its adoption, a records control schedule must be submitted to and accepted for filing by the director and librarian as provided by state law. If a schedule is not accepted for filing, the schedule shall be amended to make it acceptable for filing. The Records Management Officer shall submit the records control schedules to the director and librarian.

Sec. 1.11.12. IMPLEMENTATION OF RECORDS CONTROL SCHEDULES; DESTRUCTION OF RECORDS UNDER SCHEDULE

- a. A records control schedule for a department that has been approved and adopted under Section 1.11.11 shall be implemented by department heads, principals and Records Liaison Officers according to the policies and procedures of the records management plan.
- b. A record whose retention period has expired on a record control schedule shall be destroyed unless an open records request is pending on the record, the subject matter of the records is pertinent to a pending lawsuit, or the department head or principal requests in writing to the Records Management Committee that the record be retained for an additional period.
- c. Prior to the destruction of a record under an approved records control schedule, authorization for the destruction must be obtained by the Records Management Officer from the Records Management Committee.

Sec. 1.11.13. DESTRUCTION OF UNSCHEDULED RECORDS.

A record that has not yet been listed on an approved records control schedule may be destroyed if its destruction has been approved in the same manner as a record destroyed under an approved schedule and the Records Management Officer has submitted to and received back from the director and librarian an approved destruction authorization request.

Sec. 1.11.14. CONTRACT SERVICES.

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With approval of the Board, the Records Management Officer and Committee may assign and delegate duties under this Policy to contracted services. The engagement of contract services will not relieve persons assigned and responsible under this policy from such assignment and responsibilities.

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RECORD RETENTION SCHEDULE

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RECORDS RETENTION SCHEDULE

Local Schedule SD applies to charter schools and Local Schedule GR applies to all local governments. The schedules are available from the Texas state Library and Archives Commission website at <https://www.tsl.texas.gov/slrn/recordspubs/localretention.html>. The following from Schedule GR apply specifically to charter schools and school districts:

GR 1000-01 Agendas

Open meetings.

- 1) If the minutes describe each matter considered by the governing body and reference to an agenda is not required.
- 2) If the minutes do not describe each matter considered by the governing body and reference to an agenda is required.

GR 1000-25 Contracts, Leases, and Agreements

(a) Open meetings

- 1) If the minutes describe each matter considered by the governing body and reference to an agenda is not required.
RETENTION: Two (2) years.
- 2) If the minutes do not describe each matter considered by the governing body and reference to an agenda is required.
RETENTION: Permanent.

(b) Certified agendas of closed meetings.

RETENTION: Two (2) years.

GR 1000-03 Minutes

(a) Written minutes.

RETENTION: Permanent.

(b) Notes taken during meetings from which written minutes are prepared.

RETENTION: 90 days after approval of minutes by the governing body.

(c) Audiotapes of open meetings, except as described in (d), for which written minutes are not prepared.

RETENTION: Permanent.

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RECORD RETENTION SCHEDULE

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- (d) Audiotapes of workshop sessions of governing bodies in which votes are not made and written minutes are not required by law to be taken.

RETENTION: Two (2) years.

- (e) Audiotapes of open meetings for which written minutes are prepared.

RETENTION: 90 days after approval of minutes by the governing body.

- (f) Certified audiotapes of closed meetings.

RETENTION: Two (2) years.

- (g) Supporting documentation – One copy of each document of any type submitted to a meeting of a governing body for consideration, approval, or other action, if such action is reflected in the minutes of the meeting.

RETENTION: Two (2) years.

GR 1000-26 Correspondence, Internal Memoranda, and Subject Files

Retention Note: The minimum retention period for correspondence or internal memoranda in categories (a) and (b) directly linked to another record series or group listed in this or other commission schedules is that assigned to the other group or series. The retention periods that follow are for correspondence and internal memoranda that do not readily fall within other record groups.

- (a) Administrative – Incoming/outgoing and internal correspondence pertaining to the formulation, planning, implementation, modification, or redefinition of the programs, services, or projects of a local government and the administrative regulations, policies, and procedures that govern them. May also include subject files, which are collections of correspondence, memos and printed materials on various individuals, activities, and topics.

RETENTION: Four (4) years.

- (b) General – Incoming/outgoing and internal correspondence pertaining to the regular operation of the policies, programs, services, or projects of a local government. May also include subject files, which are collections of correspondence, memos and printed materials on various individuals, activities, and topics.

RETENTION: Two (2) years.

- (c) Routine - Correspondence and internal memoranda such as letters of transmittal, requests for publications, internal meeting notices, and similar routine matters. May also include subject files, which are collections of correspondence, memos and printed materials on various individuals, activities, and topics.

RETENTION: AV (as long as administratively valuable)

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GR 1075-01 Bids and Bid Documentation

- (a) Successful bids and requests for proposals, including invitations to bid, bid bonds and affidavits, bid sheets, and similar supporting documentation.

RETENTION: Fiscal year end + five (5) years.

Retention Note: If a formal written contract is the result of a successful bid or request for proposal, the successful bid or request for proposal and its supporting documentation must be retained for the same period as the contract. See item number GR1000-25.

- (b) Unsuccessful bids.

RETENTION: Two (2) years.

- (c) Requests for informal bid estimates, quotes, or responses from providers for the procurement of goods or services for which state law or local policy does not require the formal letting of bids.

RETENTION: One (1) year.

- (d) Requests for information (RFI) preliminary to the procurement of goods or services by direct purchase or bid.

RETENTION: AV

GR 1075-03 Purchase Order and Receipt Records

- (a) Purchase orders, requisitions, and receiving reports.

RETENTION: Fiscal year end + five (5) years

- (b) Purchasing log, register, or similar record providing a chronological record of purchase orders issued, orders received, and similar data on procurement status.

RETENTION: Fiscal year end + three (3) years

- (c) Packing slips and order acknowledgments.

RETENTION: AV

- (d) Vendor and commodity lists.

RETENTION: Until superseded

GR 1075-16 Construction Project Records

- (a) Records concerning the planning, design, construction, conversion, or modernization of local government-owned facilities, structures, and systems, including feasibility, screening, and implementation studies; topographical and soil surveys and reports; architectural and engineering drawings, elevations, profiles, blueprints, and as-builts; inspection and investigative reports; laboratory test reports; environmental impact

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statements; construction contracts and bonds; correspondence; and similar documentation except as described in (b), (c) or (d).

RETENTION: Permanent.

Retention Note: If a structure, facility, or system is sold or transferred to another person or entity, the local government must retain the original records relating to its construction. Copies of the records may be given to the person or entity to which the structure, facility, or system is sold or transferred.

- (b) Records of the types described in GR1075-16a relating to the construction of prefabricated storage sheds, bus shelters, parking lot kiosks, non-structural recreational facilities such as baseball diamonds and tennis courts, and similar structures and facilities.

RETENTION: Completion of the project + ten (10) years.

- (c) Records relating to construction projects described in GR1075-16a and GR1075-16b, that are transitory or of ephemeral relevance, and are not required for maintaining, modifying, and repurposing the building or structure. Records may include, but are not limited to, rejected design plans, delivery tickets for expendable products, daily work reports, etc.

RETENTION: Five (5) years.

- (d) Line Locate Requests, Call Before You Dig records, or other similar records documenting requests for information regarding locations of the underground cable or utility lines.

RETENTION: Completion of project requiring the locate request + two (2) years.

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POLICY GROUP 1 – GOVERNANCE

SCHOOL VISITORS

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Sec. 1.13.1. PROCEDURES FOR SCHOOL VISITORS

Notices shall be posted at each campus of **INTERNATIONAL LEADERSHIP OF TEXAS (hereinafter “ILTexas”)** requiring all visitors to first report to the campus administrative office. This policy shall apply to parents, board members, volunteers, social service workers, invited speakers, maintenance and repair persons not employed by ILTexas, vendors, representatives of the news media, former students, and any other campus visitors.

A visit by visitors to individual classrooms during instructional time requires prior approval of both the campus Principal and teacher whose class is to be visited. Such visits may not be approved or may be terminated where their duration or frequency interferes with the delivery of instruction or in any other way disrupts the educational environment.

ILTexas or the Principal may:

1. Require a visitor requesting entry onto a campus to show a driver’s license or other form of identification issued by a governmental entity displaying the visitor’s photograph.
2. Establish an electronic or paper database for storing campus visitor information. Information stored in the campus databases may be used only for purposes of ILTexas security, and may not be sold or otherwise disseminated to third parties.
3. Verify whether the visitor is a registered sex offender as identified in the computerized central database maintained by the Department of Public Safety, or in any other database accessible by ILTexas.

The Superintendent or designee, in conjunction with campus administrators, shall develop and implement procedures addressing campus visitors identified as registered sex offenders. These procedures shall include but are not limited to provisions dealing with:

1. Parental rights to visit;
2. Escorts by ILTexas personnel;
3. Access to common areas of the campus;
4. Access to classrooms;
5. Drop off and release of students; and
6. Eligibility to serve as volunteers.

Sec. 1.13.2. VISITOR CONDUCT

ILTexas invites and welcomes parents and other members of the public to its schools. ILTexas is committed to treating parents and other community members with respect and expects the same in return. To that end, ILTexas must keep schools and administrative offices free from disruptions and prevent unauthorized persons from entering the schools and school grounds.

INTERNATIONAL AMERICAN EDUCATION FEDERATION, INC.

BOARD POLICY MANUAL

POLICY GROUP 1 – GOVERNANCE

SCHOOL VISITORS

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Accordingly, this policy promotes mutual respect, civility, and orderly conduct among ILTexas employees, parents, students, volunteers and the public. ILTexas seeks to maintain to the extent possible and reasonable, a safe, harassment-free workplace for students and staff. In the interest of presenting teachers and other employees as positive role models, ILTexas encourages positive communication and discourages volatile, hostile, or aggressive actions. ILTexas seeks and encourages patrons to cooperate with this endeavor.

ILTexas recognizes the importance of employees, students, and parents engaging, collaborating, and sharing in digital environments. Accordingly, the use of technology on ILTexas property and at school-sponsored events shall be appropriate, not disruptive to the educational environment, and not detrimental to the safety of employees and students. It must also be in compliance with other applicable ILTexas policies.

An individual engaging in disruptive behavior shall be required to leave ILTexas property. Any individual who disrupts or threatens to disrupt school or office operations, threatens the health and safety of students or staff, willfully causes property damage, uses loud and/or offensive language that could provoke a violent reaction, or who has otherwise established a pattern of unauthorized entry on ILTexas property shall be directed to leave ILTexas property by the Principal or other administrator. In certain circumstances, a criminal trespass warning may also be issued or law enforcement contacted.

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Cover Sheet

CONSIDER/ACT ON DECEMBER, 2018 FINANCIAL REPORT

Section: V. Board Action Items
Item: A. CONSIDER/ACT ON DECEMBER, 2018 FINANCIAL REPORT
Purpose: Vote
Submitted by:
Related Material: Scanned from a Xerox Multifunction Printer.pdf

ILTexas Board Report

Chief Financial Officer

December 2018

Overall Status: G

On Track

State of Financials and Key Ratios

Key Ratio / Indicators	Results	Status	Notes
YTD Change in Net Assets	\$1,889,389	G	Modified basis
Days Cash On Hand - Charter FIRST - Bond Covenant	105.33 78.63	G	Preferred benchmark 20-60 days for FIRST and 45 days for Bond
Administrative Ratio (function 21+41/11+12+13+31)	5.81%	G	FIRST threshold 14%
Current Enrollment (As of end of Month)	18,563	Y	Budgeted 18,735
Current Ratio (current asset/current liabilities)	1.40	G	1.00
Debt Service Coverage Ratio (net income before int. pmt and dep / Int and principal pmt)	1.64x	G	1.10x

Special Notations and Projections

- The District did complete in December 2018 the Sale of Bonds for the remaining campuses. The District now owns all of its campuses and student dormitory.
- **DCOH calculations are much higher this month due to the accelerated payment process from TEA which the District has received approximately 50% of its FSP funds.

Agenda Topics / Decisions to be Made

- Financial Reports:**
Financial Reports for ILT: Financial Dashboard, Income Statement, Cash Flow projection and Balance Sheet.
- Financing Updates:** TBD
- Other Financial Related Reports:**
- Financial Management Related Policies for BOD Discussion:**
If yes, please attach motion form
- In Compliance with Financial Policies (Yes or No):**

Activities in Progress or Accomplished

- Charter FIRST preliminary ratings for FY2017-2018 Rating based on FY2017 audit: Passed – B Above Standard(84).
- Working with TEA on finalizing paperwork for Replication Grant for six campuses(Orem K8, College Station K8, Windmill Lakes HS and Lancaster-DeSoto HS).
- Have begun the budget prep work for the 2019-2020 budget to be finalized by December and ready for Campuses and Departments to begin entering into Skyward beginning in February 2019.
- PEIMS mid-year submission has been completed.
- Have begun the transition process to the new Bank depository with BBVA Compass.

G On Track Y Of Concern R At Risk C Complete

Created 1/16/2019

**INTERNATIONAL LEADERSHIP OF TEXAS
STATEMENT OF FINANCIAL POSITION**

ASSETS	AUDITED	
	<u>JUNE 30, 2018</u>	<u>DECEMBER 31, 2018</u>
CURRENT ASSETS		
Cash and cash equivalents	\$ 14,714,466	48,161,248
Due from TEA	22,992,358	1,525,250
Other Receivables	1,513,995	1,579,896
Deferred Expense	127,165	1,561,035
Other Current Assets	577,755	597,755
Total Current Assets	<u>39,925,739</u>	<u>53,425,184</u>
 PROPERTY AND EQUIPMENT		
Land	36,461,795	36,218,879
Buildings	361,666,176	361,666,176
Furniture and equipment	15,917,954	15,941,104
Vehicles	2,165,867	2,406,484
Less accumulated depreciation	(25,003,842)	(31,104,141)
Total Property and Equipment	<u>391,207,951</u>	<u>385,128,502</u>
Total Assets	<u>\$ 431,133,690</u>	<u>438,553,686</u>
 LIABILITIES		
CURRENT LIABILITIES		
Accounts Payable	\$ 909,551	839,228
Due to student groups	682,820	940,049
Loans - Current	-	-
Deferred revenue_Non earned FSP funds	271,070	8,509,459
Accrued wages payable	10,814,864	11,678,837
Payroll deductions and withholdings	912,776	78,217
Accrued expenses	2,040,425	2,258,522
Other Liabilities	-	-
Current portion of Capital lease payable	11,353,575	11,353,575
Current portion of long-term debt	2,553,911	2,553,911
Total Current Liabilities	<u>29,538,993</u>	<u>38,211,798</u>
 LONG-TERM LIABILITIES		
Loans		
Other Liabilities	4,550,000	3,900,000
Finance(Buildings) Lease Liability	294,052,985	240,643,204
Long-term debt	108,770,263	159,687,847
Total Long-Term Liabilities	<u>407,373,248</u>	<u>404,231,051</u>
Total Liabilities	<u>\$ 436,912,241</u>	<u>442,442,849</u>
 NET ASSETS		
Unrestricted(Beg. 9-1-17 balance)	\$ (11,415,319)	(5,778,552)
Current Year Change in Net Asset (Revenue/Expenses)	5,636,770	1,889,389
Total Net Assets	<u>(5,778,552)</u>	<u>(3,889,163)</u>
Total Liabilities and Net Assets	<u>\$ 431,133,690</u>	<u>438,553,686</u>

*****Internally Prepared Financial Statements**

**INTERNATIONAL LEADERSHIP OF TEXAS
REVENUES & EXPENDITURES MONTHLY REPORT**

Ending Net Assets 6/30/18(Audited)

(5,778,552)

REVENUE	Revised Budget	July Actuals	August Actuals	September Actuals	October Actuals	November Actuals	December Actuals	YTD TOTAL	%age of Budget
5700 Local	3,064,620	74,826	475,075	341,314	533,736	285,316	270,475	1,980,742	65%
5800 State	158,061,095	13,240,238	13,795,422	13,755,446	13,240,238	13,240,238	13,240,238	80,511,822	51%
5900 Federal	20,359,471	0	485,449	0	151,170	1,386,090	2,506,017	4,528,726	22%
	181,485,186	13,315,064	14,755,946	14,096,760	13,925,145	14,911,644	16,016,731	87,021,290	48%
EXPENSE									
11 Instructional	80,979,904	6,476,412	6,739,458	7,214,196	7,454,966	7,858,940	7,142,099	42,886,072	53%
12 Library and Media	862,993	57,793	65,151	67,253	67,910	69,767	73,756	401,630	47%
13 Curriculum development	7,319,552	334,505	418,470	432,248	502,135	744,706	491,284	2,923,348	40%
21 Instructional Leadership	966,761	66,792	95,085	105,946	104,913	104,375	98,684	575,795	60%
23 School Leadership	8,435,849	706,399	812,082	796,931	777,778	785,099	771,779	4,650,069	55%
31 Guidance & Counseling	4,653,615	298,700	259,133	305,207	538,794	351,848	300,091	2,053,772	44%
32 Social services	46,000	0	0	374	304	535	50	1,263	3%
33 Health Services	1,453,140	105,965	108,969	118,715	123,329	144,035	136,866	737,879	51%
34 Student Transportation	942,559	44,603	59,542	77,688	91,534	99,101	85,547	458,015	49%
35 Food Services	9,780,741	20,325	30,846	76,672	417,664	668,688	880,330	2,094,525	21%
36 Extra Curricular Activities	1,988,389	113,420	207,199	122,300	133,623	124,600	107,499	808,640	41%
41 General Administration	3,986,526	349,881	333,050	370,030	475,343	349,875	352,517	2,230,696	56%
* 51 Facilities Maintenance	41,897,452	2,578,268	3,535,756	3,491,047	-1,551,679	1,937,949	1,893,906	11,885,246	28%
52 Security and Monitoring	1,693,880	94	25,758	228,363	167,279	212,664	137,672	771,830	46%
53 Technology / Data Systems	5,409,440	224,224	531,470	312,475	440,200	412,873	369,904	2,291,146	42%
* 61 Community Services	1,251,399	24,767	47,211	85,472	34,400	38,555	43,487	273,892	22%
* 71 Debt Service	7,431,130	662,118	577,236	998,154	5,288,480	2,002,637	559,457	10,088,082	136%
Total	179,099,329	12,064,266	13,846,414	14,803,071	15,066,973	15,906,248	13,444,928	0	85,131,901
Change in Net Assets	2,385,857	1,250,798	909,532	(706,310)	(1,141,828)	(994,604)	2,571,802	0	1,889,389
Ending Net Assets Balance									(3,889,163)
6100 Payroll	96,474,745	8,491,364	8,491,364	8,591,611	8,569,053	8,621,727	8,597,164	51,362,283	53%
6200 Contr. Services	53,427,970	2,348,849	3,026,946	3,872,782	-3,482,433	2,793,336	2,054,332	10,613,812	20%
6300 Supplies	11,152,842	29,119	311,479	1,151,927	1,265,045	1,184,224	1,059,932	5,001,726	45%
6400 Oth. Operating	10,359,025	532,815	1,439,390	188,596	3,426,829	1,304,324	1,174,043	8,065,997	78%
6500 Debt Service	7,431,130	662,118	577,236	998,154	5,288,480	2,002,637	559,457	10,088,082	136%
6600 Capital Outlay	253,618	0	0	0	0	0	0	0	0%
	179,099,329	12,064,266	13,846,414	14,803,071	15,066,973	15,906,248	13,444,928	0	85,131,900

*The Functional revised budget will be adjusted in the following quarter to reflect the recent financing activities

**Internally prepared Financials, subject to change.

International Leadership of Texas
Cash Flow Projection

	July '18	August '18	September '18	October '18	November '18	December '18	January '19	February '19	March '19	April '19	May '19	June '19
Cash Balance	6,657,569	11,862,835	14,500,758	24,751,398	42,228,902	44,312,523	39,917,678	35,211,707	28,708,508	22,220,206	21,180,483	16,246,048
Beg. Bal. (6/30/18)												
Inflows												
Local	74,826	475,075	341,314	533,736	283,316	270,475	250,000	250,000	250,000	250,000	250,000	250,000
State	9,464,658	12,912,355	35,258,756	28,987,168	15,587,938	6,912,482	6,507,275	6,501,163	6,516,060	11,964,639	8,069,927	11,205,083
Federal	-	485,449	-	151,170	1,386,090	980,767	1,750,000	1,750,000	1,750,000	1,750,000	1,750,000	1,750,000
Other Sources	-	-	-	-	-	-	-	-	-	-	-	-
Short-term Loan	7,000,000	3,000,000	-	-	-	-	-	-	-	-	-	-
Total inflows	16,539,484	16,872,879	35,600,070	29,672,074	17,259,344	8,163,724	8,507,275	8,501,163	8,516,060	13,964,639	10,069,927	13,205,083
Outflows												
Payroll	6,932,077	7,890,788	8,591,611	8,569,053	8,621,727	8,597,164	8,560,381	8,560,381	8,560,381	8,560,381	8,560,381	8,560,381
Contr. Svcs	2,348,849	3,026,946	3,872,782	(3,482,433)	2,793,336	2,054,332	1,950,000	1,950,000	1,950,000	1,950,000	1,950,000	1,950,000
Supplies	29,119	311,479	1,151,927	1,265,045	1,184,224	1,059,932	833,621	833,621	833,621	833,621	833,621	833,621
Oth. Oper.	532,815	389,390	188,596	276,829	254,324	124,043	294,332	294,332	294,332	294,332	294,332	294,332
Debt Service	662,118	577,236	998,154	5,288,480	2,002,637	559,457	980,625	2,771,741	2,771,741	2,771,741	2,771,741	2,771,741
Short-term loan	-	-	10,000,000	-	-	-	-	-	-	-	-	-
Non-Expense(Principal)	829,239	2,039,118	546,360	277,597	319,474	163,641	594,287	594,287	594,287	594,287	594,287	594,287
Total outflows	11,334,218	14,234,956	25,349,430	12,194,570	15,175,722	12,558,570	13,213,246	15,004,362	15,004,362	15,004,362	15,004,362	15,004,362
Month End Balance	11,862,835	14,500,758	24,751,398	42,228,902	44,312,523	39,917,678	35,211,707	28,708,508	22,220,206	21,180,483	16,246,048	14,446,769

**Internally Prepared projection

Cover Sheet

Discuss Personnel Matters

Section: VI. Closed Session
Item: B. Discuss Personnel Matters
Purpose: Discuss
Submitted by:
Related Material: Authorized Board Notification 01.16.19.pdf
Authorized Board Report 1.11.19.pdf



INTERNATIONAL LEADERSHIP OF TEXAS

**Faculty and Support Staff New Hires
Subsequent to December 20, 2018
For Board Notification on January 16, 2019**

NEW HIRES FOR THE 2018-2019 SCHOOL YEAR			
Position	Assignment	Building	Start Date
Para - Campus	Instructional Aide	Arlington Elementary	01/07/2019
Prof - District	Coordinator	Garland District Office	01/07/2019
Teacher	Performanc Coach	Garland Elementary	01/07/2019
Prof - District	Instructional Coach	Houston Area Office	01/09/2019
Prof - District	Instructional Coach	Houston Area Office	01/07/2019
Para - Campus	Instructional Aide	Lancaster Elementary	01/09/2019
Teacher	Elementary	North Richland Hill Elementary	01/07/2019
Para - Campus	Instructional Aide	Orem Elementary	01/10/2019
Para - Campus	Instructional Aide	Orem Elementary	01/07/2019
Para - Campus	Instructional Aide	West Park Elementary	01/07/2019
Teacher	Elementary	West Park Elementary	01/10/2019
Prof - Campus	Interventionist	Windmill Lakes Elementary	01/14/2019
Librarian	Librarian	Windmill Lakes Elementary	01/08/2019

All employees are contingent upon Fingerprint and HR Clearance.

Total employees hired as of 1/16/2019: 13

Total Employee Count for 18/19 SY: 1944



INTERNATIONAL LEADERSHIP OF TEXAS

**Authorized Position Report
January 11, 2019**

2018 - 2019 SCHOOL YEAR

Position	# Positions	Positions Filled	Available FTE	New Campus Positions K-8	New Campus Positions HS
AUX - FOOD SERVICE	19	19	0		
AUX - MAINTENANCE	30	28	2		
AUX - TRANSPORTATION	15	15	0		
COUNSELOR	46	46	0		
LIBRARIAN/MEDIA	17	16	1		
NURSE	19	18	1		
PARA - CAMPUS	344	328	16		
PARA - DISTRICT	53	51	2		
PROF - CAMPUS	49	40	9		
PROF - CAMPUS ADMIN	65	65	0		
PROF - DISTRICT	111	101	10		
SLP	13	11	2		
SUPERINTENDENT	1	1	0		
TEACHER	1235.5	1205	30.5		
Total	2017.5	1944	73.5	0	0