



**PULLMAN** **PUBLIC**  
**COMMUNITY** **FREE**  
**MONTESSORI** **K-9**

## Pullman Community Montessori

### PCM Board Meeting

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#### Date and Time

Tuesday September 27, 2022 at 5:15 PM PDT

#### Location

PCM Board of Trustees meetings are held in the Gladish Community and Cultural Center room 102. To increase accessibility we offer a virtual option for attendance. The Zoom link can be found below.

All board meetings are open to the public. Meetings begin at 5:15 PM PST the fourth (4th) Tuesday of each month. Public comment is a standing agenda item at each monthly meeting. Items will be addressed by the board according to the Meeting Agenda posted 48 hours prior to each meeting.

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#### Join Zoom Meeting

<https://us02web.zoom.us/j/89620042723?pwd=akVHUTI3eIMxSnoxeyJwUTRwdEhodz09>

Meeting ID: 896-2004-2723

Password: 6615

#### Dial by your location

(929) 205 6099

(301) 715 8592

(312) 626 6799

(669) 900 6833

(253) 215 8782

(346) 248 7799

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If you would like to make public comment you will be called on in the order you arrived. We generally allow 5 minutes for presentation of personal comments/questions/concerns/grievances. You may view our PCM Grievance and Conflict Resolution Policy and Procedures [here](#). Public comment should be shared with the board in writing in advance of the board meeting for us to better address your consideration. Please email to [board@mypcm.org](mailto:board@mypcm.org) or submit in paper form to the PCM office in Gladish Community and Cultural Center STE 212. You should re

ceive confirmation of receipt of your written statement within 48 hours of submission. If you do not receive confirmation, please email DesireeP@myPCM.org

**PCM's Mission:** to prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community.

**PCM's Vision:** to serve as an instrument of change, helping to progress our education system to better meet the needs of students, families, and educators. We nurture students to be self-empowered lifelong learners, global citizens, environmental stewards, and compassionate and collaborative leaders, bringing positive changes to their communities and the world!

## Agenda

	Purpose	Presenter	Time
<b>I. Opening Items</b>			<b>5:15 PM</b>
<b>A.</b> Record Attendance		John Cassleman	1 m
<b>B.</b> Call the Meeting to Order	Discuss	John Cassleman	1 m
Take a moment before the meeting to review our operating norms (linked in the footer).			
<b>C.</b> Approve Meeting Minutes: Regular Meeting on 08-23-22	Approve Minutes	John Cassleman	1 m
Please come with amendments ready to put in the chat.			
<b>D.</b> Approve Meeting Minutes: Board Retreat on 08-21-22	Approve Minutes	John Cassleman	1 m
<b>E.</b> Community Building	Discuss	John Cassleman	10 m
John will be leading our session this meeting.			
*If you have not done so yet, please use <a href="#">this google document</a> to sign up for the board meeting in which you would like to lead this activity."			
<b>F.</b> DEI and Anti-racism Commitment	Vote	Laylah Sullivan	3 m
Update on DEI training for staff and board.			

	Purpose	Presenter	Time
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<b>II. Public Comment</b>			<b>5:32 PM</b>
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<b>A. Making Public Comments</b>	FYI	John Cassleman	15 m
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Welcome! If you would like to make public comment you will be called on in the order you logged in/arrived.

- We generally allow 5 minutes for presentation of personal comments/questions/concerns/grievances.
- You may view our PCM Grievance and Conflict Resolution Policy and Procedures [here](#).
- Public comment should be shared with the board in writing in advance of the board meeting for us to better address your consideration.
- Please email to [board@mypcm.org](mailto:board@mypcm.org) or submit in paper form to the PCM office in Gladish Community and Cultural Center.
- You should receive confirmation of receipt of your written statement within 48 hours of submission.

<b>III. LEADER Team Update &amp; Compliance Check-in</b>			<b>5:47 PM</b>
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Per PCM's [Charter School Contract](#) with the Commission, PCM Trustees should regularly review the [Statement of Assurances](#) to ensure we are fulfilling our obligation to the contract.

<b>A. September Update</b>	FYI	Laylah Sullivan	10 m
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<b>B. Governance - Management 2.0 Board PD session Follow Up</b>	Discuss	John Cassleman	12 m
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Discuss major takeaways from the Governance & Management PD session.

Discuss the Board & Management roles in approving contracts.

"Scenario" Discussion Question: John and Laylah signed the 'Growth Grant' Agreement, an agreement stipulating that WA Charters will grant PCM \$222,000 contingent on PCM maintaining enrollment of no fewer than 115 students for the SY2022-23. Given that approving some contracts and other binding agreements is the domain of a board while others are the domain of management, how should PCM handle the approval of future contracts?

	Purpose	Presenter	Time
<b>IV. Committee Updates</b>			<b>6:09 PM</b>
<b>A.</b> Individual Board Member Report	FYI	John Cassleman	5 m
Each trustee will briefly present on their progress toward individual goals and tasks. Additionally, trustees may report observations, feedback, or questions gathered since last meeting.			
<b>B.</b> LSEC (Leadership Evaluation & Support Committee)	FYI	John Cassleman	15 m
The LSEC will report on the HOS Annual Review to be presented at the September meeting.			
<b>C.</b> DC (Development Committee)	FYI	Ayad Rahmani	
No meeting minutes to present.			
<b>D.</b> GC (Governance Committee)	FYI	John Cassleman	
No minutes to present.			
<b>E.</b> FC (Finance Committee)	Vote	Aubree Guyton	5 m
In advance of this meeting Trustees should:			
1. Access the publicly accessible FC meeting notes and review.			
2. Review the September financials recommended by the FC.			
<b>Motion 1:</b> The FC recommends the Board approve the September financials as presented.			
As of September 24, 2022 Laylah signed the Eid Bailly audit Engagement Letter as it followed the parameters agreed to by the board. (find copy attached)			
<b>V. Action Items</b>			<b>6:34 PM</b>
<b>A.</b> Equity Plan	Vote	Laylah Sullivan	10 m
The HOS updated the previously shared Equity Plan policy to align with WA Charters recommended actionable format. The Rubric used for the equity plan is also			



	Purpose	Presenter	Time
attached. This is a living document that will be refined over time and include contributions from multiple parties.			
<b>B.</b> Updated 2021-22 Policies/Procedures/Handbooks	Vote	Laylah Sullivan	5 m
The following have not incurred any notable changes but need to be re-voted on for this School Year:			
<ul style="list-style-type: none"> <li>• 2110 &amp; 2110P (TBIP) Transitional Bilingual Instruction Program</li> <li>• 2190 &amp; 2190P Highly Capable Program</li> <li>• 2162 &amp; 2162P Section 504</li> </ul>			
The following have incurred changes:			
<ul style="list-style-type: none"> <li>• 2161 &amp; 2161P (Special Education and Related Service Policy &amp; Procedure) Rather than using WSSDA policies and procedures as is the norm, WA Charters paid legal council to create a Charter specific SPED policy and procedure. The key changes include: 1.) Replaced 'district' with 'LEA' 2.) Updated Child Find language to reflect charter-specific Child Find duties, e.g. removal of language related to students residing within district boundaries and students enrolled in private schools 3.) Removed language related to the transition from IDEA Part C to IDEA Part B, as PCM is not authorized to enroll or serve preschool students. All other adjustments and changes were related to the WAC updates and are in alignment with the updated WSSDA model policy and procedure.</li> <li>• Student and Family Handbook - minor changes to be more explicit on how to contact the board and on parking and pick-up.</li> </ul>			
The following are new:			
<ul style="list-style-type: none"> <li>• 4040 &amp; 4040P (Public Access to PCM Records) - this is needed for compliance and is cross referenced in PCM's policy and procedure 2161.</li> <li>• 2108 Learning Assistance Program - this is needed for funding compliance</li> </ul>			
Proposed Motion:			
The PCM Board of Trustees approve the updated documents as presented.			
<b>C.</b> Board Member Resignations	Vote	John Cassleman	5 m
Beverly Wolff and Melisa Medalle have submitted their resignations to the PCM Board of Trustees. The board will vote to formally accept their resignations.			
<b>D.</b> Approve Board Secretary	Vote	John Cassleman	3 m

	Purpose	Presenter	Time
With Melisa's resignation, the Secretary officer position of the PCM board is now vacant. The PCM Bylaws state that "the Corporation shall have a Chair and Secretary."			

Source: [Bylaws](#)

<b>E.</b>	Approve SY2022-23 Board of Trustees Goals	Vote	John Cassleman	15 m
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**Proposed BOT Goals 2022-23**

- Board members understand the established benchmarks for assessing school health and work towards independence.
- Establish a Development Committee
- Continuous and strategic recruitment of committee and board members.
- Committees are established and have set goals and priorities for the year.
- The board has clear engagement expectations and systems of accountability.
- The Board develops systems and plans for engaging in the larger Pullman and charter community
- Families and staff have clear and accessible systems of engagement with the board

<b>F.</b>	2022-23 School Specific Goals	Vote	Laylah Sullivan	5 m
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The PCM Board of Trustees will review and vote on the proposed 2022-23 School Specific Goals presented by the PCM Administrative Team.

<b>G.</b>	HOS Contract	Vote	John Cassleman	5 m
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The Board will consider and vote on the PCM Head of School's contract.

<b>VI.</b>	<b>Other Business</b>			<b>7:22 PM</b>
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<b>A.</b>	Summary Report on Academic Measures for SY2021-22	FYI	Laylah Sullivan	7 m
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The PCM HOS will provide a brief summary of where PCM landed with academic performance measures that are critical to the schools mission, vision, and compliance. These measures will include NWEA MAP (Measure of Academic Performance) and SBA (Smarter Balance Assessment - state required). Additionally, the MEFS (Minnesota Executive Functioning Scale) outcomes will be summarized. Although not academic, this is a measure is integral to monitor student SEL growth at PCM. The presentation will conclude with what PCM staff will be focusing on this year as a result of these outcomes.

	Purpose	Presenter	Time
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For transparency the full report provided to the Commission on PCM's 2021-22 School Specific Academic Goal is included for review.

Additionally, for full transparency the results of the 2021-22 Commission on site-review is also attached.

<b>VII. New Business</b>			<b>7:29 PM</b>
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<b>A.</b>	HOS Offer of Employment Amendment	FYI	John Cassleman	2 m
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In October, we will vote on the following amendment to the HOS Offer of Employment SY2022-23.

<b>B.</b>	PCM's Enrollment and its Impact on Long Term Financial Sustainability	Discuss	John Cassleman	5 m
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Introductory discussion about the relationship between PCM's current enrollment, enrollment goals (2022-2026), and 5-year budget.

-Understand the problem and define a problem statement

-Establish key contextual factors and develop questions for staff

<b>VIII. Closing Items</b>			<b>7:36 PM</b>
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<b>A.</b>	Adjourn Meeting	Vote	John Cassleman	1 m
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**Grounding Docs:** [Board Norms-We are LEADERS too-Structure and Responsibilities Overview](#), [PCM Logic Model](#), [EEMPS Rubric](#), [School-Wide Reflective Practice Inventory](#), [Bylaws](#)

**Resources:** [Compliance Folder](#), [Planning Year Board Calendar](#), [Planning Yr Financials Considerations](#), [OPMA Resources](#), [App Board Commitments & Background](#), [Seat & Committee Descriptions](#), [Org Charts](#), [Board Member Application Full Packet](#), [Prospective Board Member Questionnaire](#)

# Coversheet

## Approve Meeting Minutes: Regular Meeting on 08-23-22

<b>Section:</b>	I. Opening Items
<b>Item:</b>	C. Approve Meeting Minutes: Regular Meeting on 08-23-22
<b>Purpose:</b>	Approve Minutes
<b>Submitted by:</b>	
<b>Related Material:</b>	Minutes for PCM Board Meeting on August 23, 2022

APPROVED



**PULLMAN** **PUBLIC**  
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## Pullman Community Montessori

### Minutes

#### PCM Board Meeting

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##### Date and Time

Tuesday August 23, 2022 at 5:15 PM

##### Location

PCM Board of Trustees meetings are held in the Gladish Community and Cultural Center room 100a. To increase accessibility we offer a virtual option for attendance. The Zoom link can be found below. If you attend in person please wear a mask upon entry into the building. Thank you for understanding and complying with these safety mitigation measures!

All board meetings are open to the public. Meetings begin at 5:15 PM PST the fourth (4th) Tuesday of each month. Public comment is a standing agenda item at each monthly meeting. Items will be addressed by the board according to the Meeting Agenda posted 48 hours prior to each meeting.

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##### Join Zoom Meeting

<https://us02web.zoom.us/j/89620042723?pwd=akVHUTI3eIMxSn0xejJwUTRwdEhodz09>

Meeting ID: 896-2004-2723

Password: 6615

##### Dial by your location

(929) 205 6099

(301) 715 8592

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**PCM's Vision:** to serve as an instrument of change, helping to progress our education system to better meet the needs of students, families, and educators. We nurture students to be self-empowered lifelong learners, global citizens, environmental stewards, and compassionate and collaborative leaders, bringing positive changes to their communities and the world!

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#### **Trustees Present**

A. Guyton (remote), A. Rahmani, B. Wolff, J. Cassleman, L. Bruno

#### **Trustees Absent**

M. Medalle

#### **Trustees who arrived after the meeting opened**

L. Bruno

#### **Ex Officio Members Present**

L. Sullivan

#### **Non Voting Members Present**

L. Sullivan

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### **I. Opening Items**

#### **A. Record Attendance**

#### **B. Call the Meeting to Order**

J. Cassleman called a meeting of the board of trustees of Pullman Community Montessori to order on Tuesday Aug 23, 2022 at 5:24 PM.

#### **C. Approve Meeting Minutes: Regular Meeting on 06-28-22**

A. Rahmani made a motion to approve the minutes from PCM Board Meeting on 06-28-22.

A. Guyton seconded the motion.

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

**Roll Call**

A. Guyton	Aye
B. Wolff	Abstain
A. Rahmani	Aye
M. Medalle	Absent
L. Bruno	Absent
J. Cassleman	Aye

**D. Approve Meeting Minutes: Regular Meeting on 07-26-22**

A. Rahmani made a motion to approve the minutes from PCM Board Meeting on 07-26-22.

A. Guyton seconded the motion.

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

**Roll Call**

J. Cassleman	Aye
B. Wolff	Abstain
A. Guyton	Aye
A. Rahmani	Aye
M. Medalle	Absent
L. Bruno	Absent

**E. Community Building**

Team building exercise: what was your first job?

All Board members shared

L. Bruno arrived at 5:35 PM.

**F. DEI and Anti-racism Commitment**

We will have to our cancel our contract with BCC due to unforeseen circumstances with BCC. They are no longer able to provide services.

We would like to write a card to Christine and Kora, Bev will take on this action item.

**II. Public Comment**

**A. Making Public Comments**

No public comment.

### **III. LEADER Team Update & Compliance Check-in**

#### **A. Governance - Management 2.0 Board PD session**

Mike, a representative from Board On Track, gave the board a presentation about Government Management

#### **B. August Update**

Laylah shared details about the LEADERS update

Big ideas:

-Enrollment closer to 100

-SES at 22%

-Received grant funding for a school counselor and a nurse

### **IV. Committee Updates**

#### **A. LSEC (Leadership Evaluation & Support Committee)**

Memo will come to the board with the full results and recommended next steps in an upcoming meeting

#### **B. DC (Development Committee)**

#### **C. GC (Governance Committee)**

#### **D. FC (Finance Committee)**

A. Guyton made a motion to The FC recommends the Board approve the August financials as presented.

J. Cassleman seconded the motion.

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

A. Guyton made a motion to The FC recommends the Board of trustees allow the Head of School to sign the forthcoming engagement letter with Eide Bailly as the year 1 audit firm as long as the engagement letter fees do not to exceed \$25K.

J. Cassleman seconded the motion.

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

### **V. Other Business**

#### **A. Updated 2021-22 Policies/Procedures/Handbooks**

We will move this to the next meeting.

### **VI. 2022-23 Annual Budget**



**A. Review of the 2022-23 Annual Budget**

A. Rahmani made a motion to Approve the Annual Budget for SY 2022-20233 as presented.

B. Wolff seconded the motion.

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

**VII. Closing Items**

**A. Adjourn Meeting**

There being no further business to be transacted, and upon motion duly made, seconded and approved, the meeting was adjourned at 8:03 PM.

Respectfully Submitted,  
J. Cassleman

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**Grounding Docs:** [Board Norms-We are LEADERS too-Structure and Responsibilities Overview](#), [PCM Logic Model](#), [EEMPS Rubric](#), [School-Wide Reflective Practice Inventory](#), [Bylaws](#)

**Resources:** [Compliance Folder](#), [Planning Year Board Calendar](#), [Planning Yr Financials Considerations](#), [OPMA Resources](#), [App Board Commitments & Background](#), [Seat & Committee Descriptions](#), [Org Charts](#), [Board Member Application Full Packet](#), [Prospective Board Member Questionnaire](#)

## Coversheet

### Approve Meeting Minutes: Board Retreat on 08-21-22

<b>Section:</b>	I. Opening Items
<b>Item:</b>	D. Approve Meeting Minutes: Board Retreat on 08-21-22
<b>Purpose:</b>	Approve Minutes
<b>Submitted by:</b>	
<b>Related Material:</b>	Minutes for Board Retreat on August 21, 2022

APPROVED



**PULLMAN** **PUBLIC**  
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## Pullman Community Montessori

### Minutes

#### Board Retreat

Annual Board Retreat

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#### Date and Time

Sunday August 21, 2022 at 9:00 AM

#### Location

Gladish Community and Cultural Center View Room

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**PCM's Mission:** to prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community.

**PCM's Vision:** to serve as an instrument of change, helping to progress our education system to better meet the needs of students, families, and educators. We nurture students to be self-empowered lifelong learners, global citizens, environmental stewards, and compassionate and collaborative leaders, bringing positive changes to their communities and the world!

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#### Trustees Present

A. Guyton, A. Rahmani, B. Wolff, J. Cassleman, L. Bruno

#### Trustees Absent

M. Medalle

#### Ex Officio Members Present

L. Sullivan

#### Non Voting Members Present

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L. Sullivan

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## **I. Opening Items**

### **A. Record Attendance**

### **B. Call the Meeting to Order**

J. Cassleman called a meeting of the board of trustees of Pullman Community Montessori to order on Sunday Aug 21, 2022 at 9:10 AM.

## **II. Work Session**

### **A. Introductions**

### **B. "Mission Impossible"**

### **C. The Year in Review -Gallery Walk -Discussion**

### **D. Break followed by Tools of the Board: Gov. vs Mgmt.**

### **E. Tools of the Board: Board meetings & "budgeting our time"**

### **F. LUNCH**

### **G. Goal Setting: 2022-23 School Year**

The board engaged in a deep discussion about goals to stay in alignment with our mission and vision and grow from where we are.

The board agreed that while general goals were identified more work needed to be done to refine them.

Members set a date of September 13 to reconvene to finalize goals. This meeting is optional for those who want to attend. The draft will be presented to the board at the regular meeting at the end of September.

### **H. Break followed by Goal Setting: Annual Calendar & Committee Priorities**

### **I. Tour**

### **J. Closing & Ice Cream**

## **III. Closing Items**

### **A.**

### **Adjourn Meeting**

There being no further business to be transacted, and upon motion duly made, seconded and approved, the meeting was adjourned at 4:00 PM.

Respectfully Submitted,  
J. Cassleman

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**Grounding Docs:** [Board Norms-We are LEADERS too-Structure and Responsibilities Overview](#), [PCM Logic Model](#), [EEMPS Rubric](#), [School-Wide Reflective Practice Inventory](#), [Bylaws](#)

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# Coversheet

## September Update

<b>Section:</b>	III. LEADER Team Update & Compliance Check-in
<b>Item:</b>	A. September Update
<b>Purpose:</b>	FYI
<b>Submitted by:</b>	
<b>Related Material:</b>	PCM Board Dashboard 09-01-22 .xlsx

## Notice

The following file is attached to this PDF. You will need to open this packet in an application that supports attachments to pdf files, e.g. [Adobe Reader](#):

PCM Board Dashboard 09-01-22 .xlsx

# Coversheet

## Governance - Management 2.0 Board PD session Follow Up

<b>Section:</b>	III. LEADER Team Update & Compliance Check-in
<b>Item:</b>	B. Governance - Management 2.0 Board PD session Follow Up
<b>Purpose:</b>	Discuss
<b>Submitted by:</b>	
<b>Related Material:</b>	Growth Grant Year 1_PCM_.pdf





## WASHINGTON STATE CHARTER SCHOOLS ASSOCIATION GROWTH GRANT 1 AGREEMENT

This Grant Agreement (this "Agreement") is entered into on August 1, 2022, by and between Pullman Community Montessori ("PCM" or "Grantee") and the Washington State Charter Schools Association ("WA Charters") (together, "the Parties"). The term of this grant is 12 months from the date of both parties signing this document.

### PURPOSE OF THIS AGREEMENT

WA Charters is in receipt of funding to assist in implementation of the new charter law and to support operating school leaders and growing charter schools in the State of Washington. The purpose of the Grant is to provide funding for costs associated with growing the number of available charter seats until the school reaches full scale (the "Growth Grant") as described in your Assurances and Budget Detail (the "Budget"), collectively referred to as "the Project." The Growth Grant is designed to support schools on a per student served basis and reward strong student enrollment and retention. Pursuant to the Agreement, Grantee has agreed to undertake certain activities and obligations to accomplish the Project; and WA Charters desires to make a grant to Grantee to be given pursuant to the terms and conditions in this Agreement.

### WA CHARTERS COMMITMENT

WA Charters shall award Grantee grant funds in the amount of **\$222,000 based on maintaining a 2022-2023 yearlong student count of no fewer than 115 students**. Such grant funds shall be given in accordance with the following schedule:

Due Date	Payment Date	Milestone or Deliverable	Payment Amount
August 15, 2022	August 31, 2022	Receipt of countersigned Grant Agreement  Purchase of WA Charters Membership and evidence of contract for True Measure Collaborative services  Evidence of signed contract with Joule Growth Partners and BoardOnTrack Accelerated membership  Submission of WA Charters Budget Workbook, all tabs completed  Strategy memo to reach 50% FRPL goal, if no met in previous school year	\$177,600
November 15, 2022	N/A	Submission of Q4 WA Charters Workbook, including budget to actuals from previous fiscal year	
January 15, 2023	N/A	Evidence of use of data dashboard for board monitoring of financial, organizational, and academic results	

		<p>Submission of WA Charters October Data Collection Survey</p> <p>Submission of Fall interim assessment data for math and ELA for each grade level served in WA Charters Assessment Results template</p> <p>Submission of WA Charters Budget Workbook updated for Q1</p> <p>Completed audit report, if not available at this date, please submit when completed</p> <p>Submission of fundraising report for previous fiscal year in WA Charters Fundraising Workbook template</p> <p>Submission of updated organizational Fundraising Plan</p> <p>Submission of organizational Equity Plan</p> <p>Submission of evidence of Title 1 Parent and Family Engagement Policy, School-Parent Compact and Annual School Meeting (Back-to-School Night)</p> <p>Mid-Year Grantee-WA Charters Check-In</p>	
April 15, 2023	N/A	<p>Submission of Winter interim assessment data for math and ELA for each grade level served in WA Charters Assessment Results template</p> <p>Submission of WA Charters Budget Workbook updated for Q2, must include previous year's audited financials</p>	
July 15, 2023	July 31, 2023	<p>Submission of WA Charters May Data Collection Survey</p> <p>Submission of WA Charters Member Survey</p> <p>Submission of Spring interim assessment data for math and ELA for each grade level served in WA Charters Assessment Results template with yearlong analysis of overall student growth</p> <p>Evidence of application for all eligible state categorical funding – TBIP, LAP, and HiCAP, and Safety Net funding</p> <p>Submission of WA Charters Budget Workbook template updated for Q3, must include 4-year budget forecast</p> <p>Submission of updated WA Charters Fundraising Workbook, including evidence of \$25,000 match commitment</p> <p>Submission of SAO and nonprofit financial audit results</p> <p>Participation of FACE staff in FACE PLC program</p> <p>Participation by School Leaders in Racial Equity Identity Groups</p> <p>End-of-year Grantee-WA Charters check-in</p>	<p>Up to \$44,400</p> <p><i>Final grant payment will be trued up based on no more than 5% loss of student enrollment.</i></p>

	<b>Award Total</b>		<b>Up to \$222,000</b>
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Such grant funds may only be used for the Project and allowable project expenses, as outlined in the approved Grant application and budget. Any grant funds unexpended or uncommitted at the end of the Grant Period must be promptly returned to WA Charters. Any Budget cost category change of more than 10% must be approved in writing by WA Charters in advance. Grantee may not use the grant funds to reimburse any expenses incurred prior to the beginning date of the Grant Period. Grantee acknowledges that funds have been awarded at the discretion of WA Charters and that all alterations are subject to input from both parties. Grantee must be current on all reasonable grant-related reporting requests and an active member of WA Charters to be eligible for all subsequent payments. \$222,000 is provided for general operating support, for work with Joule Growth Partners (\$39,500), and for work with BoardOnTrack (\$10,000).

## GRANTEE COMMITMENT

As a condition of the receipt of funds under this grant program, Grantee agrees to comply with the following grant Conditions and Assurances. The signatures of the authorized agents (organization leader and governing board chair) on this application indicate acknowledgement and agreement to all assurances.

*By submitting a grant agreement for a WA Charters Growth Grant, the Grantee is making the following assurances:*

### LEAD FOR EQUITY WITH CULTURAL HUMILITY

1. The Grantee will submit a comprehensive organizational Equity Plan, that outlines its efforts to increase learning outcomes for all students, eliminate rates of disproportional discipline, and create an environment of inclusion and belonging for students, families, and staff.
2. The Grantee values their students' communities, acknowledges the value of board, teacher and staff diversity, and strives to retain a diverse team representative of the student community.
3. School leadership, as defined by the Grantee, will participate in the WA Charters Racial Equity Identity Groups, a yearlong cohort (if available).

### CLOSE OPPORTUNITY GAPS

4. The Grantee will expect and work toward high-levels of student achievement for every student, striving to meet 100% of student growth targets per the authorizer academic performance framework, demonstrate 1-1.5 grade level of academic growth per year for all students, and meet all mission-specific goals.
5. The Grantee is committed to serving "at-risk" students as defined by SB 6194 by maintaining a Free and Reduced Priced Lunch percentage above the greater of their local district's average or 50% and working to back-fill any student vacancies to meet the enrollment projections set forth in the charter application. The Grantee will strive to serve above their local district's average of students with Individual Education Programs and English Language Learners.
6. The Grantee will participate annually in all testing programs required by state law and administer a benchmark assessment in each grade served for math and ELA that demonstrates student proficiency towards grade level mastery at least three times a school year.
7. The Grantee will purchase True Measure Collaborative services for inclusive education supports.

### MAINTAIN STRONG SYSTEMS

8. The Grantee will maintain a data dashboard that is regularly reviewed by the Board of Directors for school's organizational, financial, and academic health. The dashboard or like tool will enable the school to track student academic and discipline outcomes for disproportionality.
9. The Grantee will continue to perform all duties included in both their approved charter contract and annual authorizer conditions.
10. The Grantee will notify WA Charters of being in receipt of any Office of Civil Rights complaints, Washington Integrated Sub-recipient Monitoring results, and State Auditors' Office audit results within two weeks of receipt to inform technical assistance.

### **CONDUCT AUTHENTIC AND SUSTAINED FAMILY AND COMMUNITY ENGAGEMENT**

11. The Grantee will provide evidence of a Title 1 Parent and Family Engagement Policy, School-Parent Compact and evidence of Annual School Meeting (Back-to-School Night).
12. The Grantee will send a designee to participate in the WA Charters Family and Community Engagement Professional Learning Community, a yearlong, cohort-based program (if available).
13. The admission policy of the Grantee shall comply with all applicable state and federal laws and the Grantee will strive to retain at least 90% of students from year-to-year.

### **MAINTAIN A STRONG BUDGET**

14. The Grantee will provide a high-quality education to students with the financial resources available. School will apply for all state categorical funds for which it is eligible (e.g. Highly Capable, TBIP, LAP), as well as Safety Net funding, if applicable.
15. The Grantee will submit financial information using the WA Charters Budget Workbook template and WA Charters may request additional financial documents if needed.
16. The Grantee will submit an updated Fundraising Plan and update the WA Charters Fundraising Workbook template, reflecting the Grantee's fundraising of at least \$40,000 outside of awards from WA Charters Startup Grant and Charter School Program Grant to secure final \$40,000 of Growth Grant award. Commitment, but not cash is required.

### **CONTRIBUTE TO OUR LARGER SECTOR**

17. The Grantee will participate as an active WA Charters membership by purchasing a WA Charters Operating School Membership, sending a designee to participate in WA Charters Member Council, and participating in WA Charters Annual Member Feedback Survey and Bi-Annual Data Collection.
18. The Grantee will promote sector wide sustainability through on-going, active contributions to WA Charters-led charter sector communications and advocacy efforts, including legislative visits, media placements, and sharing of academic results.

### **STEWARDSHIP OF GRANT FUNDS RESPONSIBLY**

19. The Grantee will check-in regularly with WA Charters staff, or designee, to discuss Grantee's progress.
20. WA Charters reserves the authority to require the repayment of received funds, the return of all unused funds, and/or the termination of the grant if the grant recipient fails to meet the terms of this agreement, fails to meet established deadlines, or fails to act in good faith to carry out the activities described in the grant proposal.

21. The Grantee agrees to use the funding in a manner consistent with their application materials as submitted, or as revised and approved.
22. The Grantee agrees to fulfill the performance measures specific to its grant type and submit timely financial reports, status reports, and all other required reports. Failure to do so could result in the forfeiture of the grant and repayment of funds.
23. The Grantee acknowledges and understands that all funds received under this grant program are subject to progress payments based on demonstrated completion of the activities as described in the grant application documents and grant agreement, and that progress payments may be withheld until receipt and examination of grantee provided and/or other required documentation provides adequate indication that progress measures have been met.
24. The Grantee agrees to participate in any external evaluation of the effectiveness of the grant process.
25. The Grantee agrees that auditable records, specifically grant expenditure documentation, will be maintained on file by the charter organization for five years following the grant closing date, and made accessible if needed by the granting agency.
26. The Grantee agrees that the organization's name will be used in all communications.
27. The Grantee agrees to provide timely responses to surveys or other methods of data collection that may be required for the full grant period and six months beyond the grant period.
28. The Grantee agrees all grant funds shall be a part of the organization's required annual audit(s).
29. The Grantee agrees to file the following documents at their business offices:
  - Organizational charts signed articles of incorporation, and any other organizational and governance documents of the agency.

A copy of this Application and the general assurances and certifications, as well as other relevant materials that are referred to herein and in the submitted application

## GRANT DELIVERABLES, REPORTING, AND DEADLINES

The term of this grant is 12 months from the date of both parties signing this document. See table above for deliverables schedule.

## PAYMENT SCHEDULE

See table above for payment schedule.

## TERMS AND CONDITIONS

1. **Use of Grant Funds.** Grant funds may only be used for the Project and allowable project expenses, as detailed in this Agreement. Any grant funds unexpended or uncommitted at the end of the term of this Agreement must be promptly returned to WA Charters. Any budget cost category change of more than 10% must be approved in writing by WA Charters in advance. Grantee may not use the grant funds to reimburse any expenses incurred prior to the beginning date of the Agreement. Grantee acknowledges that funds have been awarded at the discretion of WA Charters and that all alterations are subject to input from both parties.
2. **Lobby and Electioneering Prohibition.** Grantee may not use grant funds to influence the outcome of an election for public office or to carry on any voter registration drive. Grantee acknowledges that grant funds have not been earmarked to support lobbying activities or to otherwise support attempts to influence legislation. Grantee confirms that the project budget accurately reflects that Grantee will expend at least the amount of grant funds on (a) non-lobbying activities in the project year, or (b) for multiple year projects, the total non-lobbying portion of the project.

### WA Charters Growth Grant 1 Agreement – 2022-2023

3. **Other Lobbying, Gift, and Ethics Rules.** You agree to comply with any national, state, local, or other lobbying, gift, ethics rules applicable to the Project. The Grantee is not retaining or employing you to engage in lobbying activities.
4. **Anti-Corruption; Anti-Bribery.** Grantee will not offer or provide money, gifts, or any other things of value directly or indirectly to anyone in order to improperly influence any act or decision relating this project including by assisting any party to secure an improper advantage.
5. **Tax-Exempt Status.** Grantee confirms that it is exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code of 1986, as amended (the "Code").
6. **Status of Grantee.** Grantee has been selected to participate in this Project at WA Charters' discretion. Grantee may state that Grantee is a grantee or subcontractor of WA Charters for the Project.
7. **Obligations of Grantee.** Grantee agrees to perform the activities described in this Agreement.
8. **Compliance.** WA Charters has the right at its discretion to terminate or suspend the grant or withhold payment if (a) WA Charters is not reasonably satisfied with Grantee's progress on Grantee's obligations with respect to the Project; or (b) significant leadership or other changes occur that WA Charters believes may threaten the Project; or (c) Grantee fails to comply with any term or condition of this Agreement. On termination, if requested by WA Charters, Grantee agrees to promptly return to WA Charters any unspent or uncommitted grant funds (as of the date of termination) previously distributed to Grantee by WA Charters for the Project.
9. **Relationship of the Parties.** Nothing in this Agreement shall constitute the naming of either party hereto as an agent or legal representative of the other party for any purpose whatsoever except as specifically and to the extent set forth herein. This Agreement shall not be deemed to create any relationship of agency, employment, partnership, or joint venture between the parties hereto.
10. **Counterparts.** This Agreement may be executed in counterparts, each of which shall be deemed an original and all of which together shall constitute one and the same instrument.
11. **Entire Agreement.** This Agreement constitutes the entire agreement among the parties with respect to the subject matter hereof; it supersedes any prior agreement and understandings among the parties as to such matters, oral or written, all of which are hereby cancelled.
12. **Assignment.** Neither party may assign or transfer its rights or obligations under this Agreement without the prior written consent of the other party, which may be withheld in the sole discretion of the party to which the request for consent is directed. Any other attempt to do so shall be null and void.
13. **Severability, Amendments.** The provisions of this Agreement are severable so that if any provision is found to be invalid, illegal, or unenforceable, such finding shall not affect the validity, construction, or enforceability of any remaining provision. This Agreement may not be amended or modified, except in a writing signed by both parties hereto.
14. **Term.** This Agreement shall take effect on the date indicated above and shall remain in effect for an initial term of two (2) years, which may be extended by mutual written agreement of the parties.
15. **Publicity.** The parties may jointly develop and distribute periodic press releases addressing activities and initiatives under this Agreement. Neither party will issue a press release that addresses the activities of the parties under this Agreement without the prior written consent of the other.
16. **Future Funding.** Grantee acknowledges and agrees that WA Charters and its representatives have made no actual or implied promise of funding except for the amounts, if any, specified herein.

17. **Third Parties.** Nothing in this Agreement is intended or shall be construed or interpreted to give any person or entity, other than the Grantee and WA Charters, any legal, equitable right, remedy, or claim under or with respect to this Agreement or any provision contained herein.
18. **Limitation on Liability.** Neither party shall be liable to the other for any damages whatsoever arising out of or in connection with this Agreement (even if such party has been advised of the possibility of such losses or damages), including any indirect, incidental, special, or consequential damages including, but not limited to, loss of profits or revenue, which arise out of the performance or failure to perform any obligation contained herein, whether the claim is in contract, tort (including negligence), or strict liability or otherwise.
19. **Choice of Law.** This Agreement shall be governed by, and construed and interpreted in accordance with, the laws of the State of Washington.

## SIGNATURES

### WA Charters:

Washington State Charter  
Schools Association, a  
Washington nonprofit corporation

### Grantee:

Pullman Community Montessori, a  
Washington nonprofit corporation

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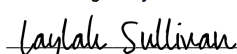


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Natalie Fester

Date: 7/27/2022

DocuSigned by:



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Laylah Sullivan

Date: 8/29/2022

### Grantee:

Pullman Community Montessori, a  
Washington nonprofit corporation

DocuSigned by:



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John Casselman

Date: 8/1/2022

# Coversheet

## LSEC (Leadership Evaluation & Support Committee)

<b>Section:</b>	IV. Committee Updates
<b>Item:</b>	B. LSEC (Leadership Evaluation & Support Committee)
<b>Purpose:</b>	FYI
<b>Submitted by:</b>	
<b>Related Material:</b>	Laylah_Sullivan_CEO_Evaluation_FY21-22_evaluation (1) (1).docx.pdf





**PULLMAN** **PUBLIC**  
**COMMUNITY** **FREE**  
**MONTESORI** **K-9**

**Pullman Community Montessori**  
**School Leader Evaluation FY21-22 evaluation**  
**Laylah Sullivan**

Prepared By: The Leadership Support and Evaluation Committee  
Date: 18 Sep 2022

## Purpose of Evaluation

It is the Board's responsibility to hire, manage and support the School Leader of the organization. This annual evaluation serves as an important tool in meeting that responsibility. The main purposes of the evaluation are:

1. To provide the School Leader with the opportunity to reflect on their performance over the past year, and to share those reflections in a structured way with the board
2. To provide explicit feedback from staff and Board to the School Leader on her/his performance, to help her/him recognize both strengths and areas for improvement.

## Methodology

The School Leader completed a self-evaluation and provided evidence to support their rating. This information was shared with the full board.

The full board and direct reports were asked to complete an online, anonymous survey through BoardOnTrack's School Leader Evaluation Tool. The Evaluation Tool was customized to be similar to the School Leader Evaluation Tool from the Montessori Playbook, produced by the National Center for Montessori in the Public Sector.

It was noted that there was a strong correlation between the survey results from staff, board members and Laylah's own self-evaluation, showing that Laylah's self-assessment shows self-awareness and that Laylah strived to be fair and accurate when considering her strengths and areas for growth.

The results from the Board on Track summary were augmented with feedback received via satisfaction surveys from families and staff.

## Executive Summary

The School Leader's performance over the last year has been extraordinary. Her tireless work ethic, and her unsurpassed commitment to Pullman Community Montessori signal strong potential as a school leader. In a first year of operations that involved no shortage of curveballs and moving parts, the School Leader guided the school with resilience, hard work, persistence and diligence.

### Most Significant Accomplishments and Strengths Demonstrated this Year

- **Resilience** 2021-2022 was a challenging year for most of us involved in education, and for a new school, the challenges were even larger, as the

school has not yet developed a strong sense of community, traditions and support systems. Laylah shepherded a new school in its first year of operation through all of the challenges of the pandemic – difficulty in building community because of limited opportunities to gather, staffing shortages, transportation issues, quarantining and needing to close the school, supply chain issues, delays in renovation, loss of the Montessori coach mid-year, etc. She showed great resilience and grit.

- **Hiring** At a time when many teachers have been leaving the profession due to fatigue from teaching during the pandemic, Laylah actively recruited a full staff for the second year of operations. Not only did she hire teachers, but also a nurse, a bus driver, a food manager, all difficult to fill positions.
- **Oversight of renovations** During the summer of 2021 and 2022, Laylah successfully oversaw major renovations. As a result, students and staff have beautiful environments, well suited to Montessori practice. Laylah's experience of managing her family construction business has been a real asset in managing the renovation process.

As in any evaluation, there are areas in which the School Leader should focus on improving over the coming year. Two areas seem most critical.

**The first is community building.** Laylah has commented that due to Covid restrictions, the opportunities for community building were limited during the previous school year, and that this needs to be a high priority for the 2022 – 2023 school year. Without a strong sense of community we are unlikely to meet our enrollment goals for the 2023 – 2024 school year, which needs a 64% increase in students, unless new targets are set. Community building is important to the commitment of staff, students, families, board members and the broader community. Every effort needs to be made to engage our school community in meaningful ways – volunteering, events, opportunities to observe, outreach and publicity . . . This community building effort needs to be a high priority for Laylah to lead. As this must be a priority for the school to succeed, the mid-year check-in this year will focus on the satisfaction and retention of students and staff. It is essential that we retain staff this year. The loss of staff last year led to anxiety among both families and staff, and onboarding new staff at the start of this year is time consuming. We recommend that Laylah makes taking care of her people – staff and families – a very high priority. The key challenge is to continue to build a school and staff culture that is resilient, trusting, and passionate about Montessori. A willingness to discuss the results of the evaluation assuming positive intent in all feedback and to partner with all involved to ensure the mission of PCM is able to be fully realized.

**The second area for growth seems to center around delegation, time management and developing/including skills and talents of others.** The opening year presented so many challenges (losing key staff member, shortage of subs, Covid challenges for remaining open and running with staff having to quarantine, etc.) that Laylah relied heavily on her own determination to push

through, and didn't have the time to delegate or develop talents and skills in others. With increased staff for the 2022 – 2023 school year, especially staff in the office/admin team, this is a vital goal for this year - delegation, developing trust in others to complete tasks, utilizing skills and talents of others, listening and including the ideas of others. We encourage Laylah to fully utilize the contract with Spokane International Academy during this school year, to free up more of her time to develop the PCM community and team. This will help PCM actively live its mantra of 'We are leaders.'

As far as time management goes, with more office/admin team staff, it would be helpful for Laylah to be working less in the immediate moment and more in planning for the future. This would help staff, families, board members and volunteers e.g. board members having information provided a week ahead to allow for careful consideration, volunteer opportunities requested well ahead of a need, e.g. for overnight camping experience.

As part of time management, and priority building for the future, this seems a pivotal time for Laylah, as Head of School, to revisit the original plan and vision for the school, and use data on enrollment, staffing and from feedback to be proactive in creating a high fidelity sustainable program.

Questions for the Head of School to deeply consider with the board of trustees include:

- Is the growth model for the school realistic and sustainable?
- Are there enough staff and resources for the school to be both a high-fidelity Montessori school and a high-fidelity Place Based school in a small school that is both public and in a rural setting?
- We recommend that these discussions happen during this fall, as the hiring and recruitment window for the 2023-2024 school year opens around November.
  - How many students do we realistically think we will enroll?
  - How many teachers/classrooms will we need?
  - Is this the right time to go further into the adolescent community? Shall we concentrate and strengthen our K-6 program first?
  - Once plans are agreed upon by the PCM Board and Head of School, these plans should be communicated early to the community.

We thank Laylah for all of her hard work and commitment to PCM during the 2021-2022 school year, and send our best wishes for the 2022-2023 school year. We look forward to discussing this Head of School Evaluation in person with Laylah, and supporting her through the coming year.

# Coversheet

## FC (Finance Committee)

<b>Section:</b>	IV. Committee Updates
<b>Item:</b>	E. FC (Finance Committee)
<b>Purpose:</b>	Vote
<b>Submitted by:</b>	
<b>Related Material:</b>	PCM-Eid Bailly 2021-22 Audit Engagement Letter (Signed).pdf 1. PCM Finance Dashboard August 2022.pdf 6. PCM Payroll and AP Certification August 2022.pdf 3. PCM Balance Sheet August 2022.pdf 4a. PCM Detailed BvA August 2022.pdf 5. PCM Statement of Cash Flows August 2022.pdf 2. PCM Income Statement August 2022.pdf 4. PCM Budget Status August 2022.pdf 6a. PCM Auditing Officer Approval August 2022.pdf 6c. PCM AP Register August 2022.pdf 6b. PCM Payroll Report August 2022.pdf



September 21, 2022

Pullman Community Montessori  
115 NW State ST Room 215  
Pullman, WA 99163

The following represents our understanding of the services we will provide to Pullman Community Montessori.

You have requested that we audit the governmental activities and each major fund of Pullman Community Montessori, as of August 31, 2022, and for the year then ended, and the related notes, which collectively comprise Pullman Community Montessori's basic financial statements. We are pleased to confirm our acceptance and our understanding of this audit engagement by means of this letter.

The objectives of our audit are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with auditing standards generally accepted in the United States of America (GAAS) and in accordance with *Government Auditing Standards*, and/or state or regulatory audit requirements will always detect a material misstatement when it exists. Misstatements, including omissions, can arise from fraud or error and are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

Accounting principles generally accepted in the United States of America (U.S. GAAP), as promulgated by the Governmental Accounting Standards Board (GASB) require that certain information be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the GASB, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. As part of our engagement, we will apply certain limited procedures to the required supplementary information (RSI) in accordance with auditing standards generally accepted in the United States of America (U.S. GAAS). These limited procedures will consist primarily of inquiries of management regarding their methods of measurement and presentation, and comparing the information for consistency with management's responses to our inquiries. We will not express an opinion or provide any form of assurance on the RSI. The following RSI is required by U.S. GAAP. This RSI will be subjected to certain limited procedures but will not be audited:

- Management's Discussion and Analysis
- Budgetary Comparison Information
- Schedule of Employer's Share of Net Pension Liability
- Schedule of Employer Contributions

## Auditor Responsibilities

We will conduct our audit in accordance with GAAS and in accordance with *Government Auditing Standards*, and/or any state or regulatory audit requirements. As part of an audit in accordance with GAAS and in accordance with *Government Auditing Standards*, and/or any state or regulatory audit requirements we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. However, we will communicate to you in writing concerning any significant deficiencies or material weaknesses in internal control relevant to the audit of the financial statements that we have identified during the audit.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Conclude, based on the audit evidence obtained, whether there are conditions or events, considered in the aggregate, that raise substantial doubt about Pullman Community Montessori's ability to continue as a going concern for a reasonable period of time.

Because of the inherent limitations of an audit, together with the inherent limitations of internal control, an unavoidable risk that some material misstatements may not be detected exists, even though the audit is properly planned and performed in accordance with U.S. GAAS and, if applicable, in accordance with *Government Auditing Standards* and/or state or regulatory audit requirements.

## Compliance with Laws and Regulations

As previously discussed, as part of obtaining reasonable assurance about whether the basic financial statements are free of material misstatement, we will perform tests of Pullman Community Montessori's compliance with the provisions of applicable laws, regulations, contracts, and agreements. However, the objective of our audit will not be to provide an opinion on overall compliance and we will not express such an opinion.

## Management Responsibilities

Our audit will be conducted on the basis that management and, when appropriate, those charged with governance, acknowledge and understand that they have responsibility:

- a. For the preparation and fair presentation of the basic financial statements in accordance with accounting principles generally accepted in the United States of America;
- b. For the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of basic financial statements that are free from material misstatement, whether due to error fraudulent financial reporting, misappropriation of assets, or violations of laws, governmental regulations, grant agreements, or contractual agreements; and

- c. To provide us with:
  - i. Access to all information of which management is aware that is relevant to the preparation and fair presentation of the basic financial statements such as records, documentation, and other matters;
  - ii. Additional information that we may request from management for the purpose of the audit;
  - iii. Unrestricted access to persons within the entity from whom we determine it necessary to obtain audit evidence.
- d. For identifying and ensuring that the entity complies with the laws and regulations applicable to its activities;
- e. For adjusting the basic financial statements to correct material misstatements and confirming to us in the management representation letter that the effects of any uncorrected misstatements aggregated by us during the current engagement and pertaining to the current period under audit are immaterial, both individually and in the aggregate, to the basic financial statements as a whole; and
- f. For acceptance of nonattest services, including identifying the proper party to oversee nonattest work;
- g. For maintaining adequate records, selecting and applying accounting principles, and safeguarding assets.
- i. For informing us of any known or suspected fraud affecting the entity involving management, employees with significant role in internal control and others where fraud could have a material effect on the financials; and
- j. For the accuracy and completeness of all information provided.

As part of our audit process, we will request from management and, when appropriate, those charged with governance, written confirmation concerning representations made to us in connection with the audit.

### **Nonattest Services**

With respect to any nonattest services we perform, we agree to perform the following:

- Prepare financial statements in conformity with U.S. generally accepted accounting principles based on information provided by you.
- Prepare government-wide conversion entries.

We will not assume management responsibilities on behalf of Pullman Community Montessori. Pullman Community Montessori's management understands and agrees that any advice or recommendation we may provide in connection with our audit engagement are solely to assist management in performing its responsibilities.

Pullman Community Montessori's management is responsible for (a) making all management decisions and performing all management functions; (b) assigning a competent individual to oversee the services; (c) evaluating the adequacy of the services performed; (d) evaluating and accepting responsibility for the results of the services performed; and (e) establishing and maintaining internal controls, including monitoring ongoing activities.

Our responsibilities and limitations of the nonattest services are as follows:

- We will perform the services in accordance with applicable professional standards.
- The nonattest services are limited to the services previously outlined above. Our firm, in its sole professional judgment, reserves the right to refuse to do any procedure or take any action that could be construed as making management decisions or assuming management responsibilities.



## Reporting

We will issue a written report upon completion of our audit of Pullman Community Montessori's basic financial statements. Our report will be addressed to the governing body of Pullman Community Montessori. Circumstances may arise in which our report may differ from its expected form and content based on the results of our audit. Depending on the nature of these circumstances, it may be necessary for us to modify our opinions, add an emphasis-of-matter or other-matter paragraph(s), to our auditor's report, or if necessary, withdraw from the engagement. If our opinions on the basic financial statements are other than unmodified, we will discuss the reasons with you in advance. If, for any reason, we are unable to complete the audit or are unable to form or have not formed opinions, we may decline to express opinions or to issue a report as a result of this engagement.

In accordance with the requirements of *Government Auditing Standards*, we will also issue a written report describing the scope of our testing over internal control over financial reporting and over compliance with laws, regulations, and provisions of grants and contracts, including the results of that testing. However, providing an opinion on internal control and compliance over financial reporting will not be an objective of the audit and, therefore, no such opinion will be expressed.

## Other

We understand that your employees will prepare all confirmations we request and will locate any documents or support for any other transactions we select for testing.

If you intend to publish or otherwise reproduce the basic financial statements and make reference to our firm, you agree to provide us with printers' proofs or masters for our review and approval before printing. You also agree to provide us with a copy of the final reproduced material for our approval before it is distributed.

Regarding the electronic dissemination of audited financial statements, including financial statements published electronically on your website or elsewhere, you understand that electronic sites are a means to distribute information and, therefore, we are not required to read the information contained in these sites or to consider the consistency of other information in the electronic site with the original document.

Professional standards prohibit us from being the sole host and/or the sole storage for your financial and non-financial data. As such, it is your responsibility to maintain your original data and records and we cannot be responsible to maintain such original information. By signing this engagement letter, you affirm that you have all the data and records required to make your books and records complete.

## Provisions of Engagement Administration, Timing and Fees

During the course of the engagement, we will only provide confidential engagement documentation to you via Eide Bailly's secure portal or other secure methods, and request that you use the same or similar tools in providing information to us. Should you choose not to utilize secure communication applications, you acknowledge that such communication contains a risk of the information being made available to unintended third parties. Similarly, we may communicate with you or your personnel via e-mail or other electronic methods, and you acknowledge that communication in those mediums contains a risk of misdirected or intercepted communications.

Should you provide us with remote access to your information technology environment, including but not limited to your financial reporting system, you agree to (1) assign unique usernames and passwords for use by

our personnel in accessing the system and to provide this information in a secure manner; (2) limit access to “read only” to prevent any unintentional deletion or alteration of your data; (3) limit access to the areas of your technology environment necessary to perform the procedures agreed upon; and (4) disable all usernames and passwords provided to us upon the completion of procedures for which access was provided. We agree to only access your technology environment to the extent necessary to perform the identified procedures.

Kristin Diggs is the engagement partner for the audit services specified in this letter. Responsibilities include supervising services performed as part of this engagement and signing or authorizing another qualified firm representative to sign the audit report.

Our fees are based on the amount of time required at various levels of responsibility, plus actual out-of-pocket expenses, including administrative charges. Invoices are payable upon presentation. We estimate that our fee for the audit will be \$18,500. We will notify you immediately of any circumstances we encounter that could significantly affect this initial fee estimate. Whenever possible, we will attempt to use Pullman Community Montessori’s personnel to assist in the preparation of schedules and analyses of accounts. This effort could substantially reduce our time requirements and facilitate the timely conclusion of the audit. Further, we will be available during the year to consult with you on financial management and accounting matters of a routine nature.

The ability to perform and complete our engagement consistent with the estimated fee included above depends upon the quality of your underlying accounting records and the timeliness of your personnel in providing information and responding to our requests. To assist with this process, we will provide you with a Prepared-by-Client (PBC) request that identifies the information we will required to perform our engagement, as well as a planned timeline for the engagement. A failure to provide this information in an accurate and timely manner may result in an increase in our fees and/or a delay in the completion of our engagement.

We may be requested to make certain audit documentation available to outside parties, including regulators, pursuant to authority provided by law or regulation or applicable professional standards. If requested, access to such audit documentation will be provided under the supervision of Eide Bailly LLP’s personnel. Furthermore, upon request, we may provide copies of selected audit documentation to the outside party, who may intend, or decide, to distribute the copies of information contained therein to others, including other governmental agencies. We will be compensated for any time and expenses, including time and expenses of legal counsel, we may incur in making such audit documentation available or in conducting or responding to discovery requests or participating as a witness or otherwise in any legal, regulatory, or other proceedings as a result of our Firm’s performance of these services. You and your attorney will receive, if lawful, a copy of every subpoena we are asked to respond to on your behalf and will have the ability to control the extent of the discovery process to control the costs you may incur.

Should our relationship terminate before our audit procedures are completed and a report issued, you will be billed for services to the date of termination. All bills are payable upon receipt. A service charge of 1% per month, which is an annual rate of 12%, will be added to all accounts unpaid 30 days after billing date. If collection action is necessary, expenses and reasonable attorney’s fees will be added to the amount due.

We may use third party service providers and/or affiliated entities (including Eide Bailly Shared Services Private Limited) (collectively, “service providers”) in order to facilitate delivering our services to you. Our use of service providers may require access to client information by the service provider. We will take reasonable precautions to determine that they have the appropriate procedures in place to prevent the unauthorized release of confidential information to others. We will remain responsible for the confidentiality of client information accessed by such service provider and any work performed by such service provider.

Neither of us may use or disclose the other's confidential information for any purpose except as permitted under this engagement letter or as otherwise necessary for Eide Bailly to provide the services. Your confidential information is defined as any information you provide to us that is not available to the public. Eide Bailly's confidential information includes our audit documentation for this engagement. Our audit documentation shall at all times remain the property of Eide Bailly LLP. The confidentiality obligations described in this paragraph shall supersede and replace any and all prior confidentiality and/or nondisclosure agreements (NDAs) between us.

You agree to share all facts that may affect your financial statements, even if you first become aware of those facts after the date of the auditor's report but before the date your financial statements are issued.

We agree to retain our audit documentation or work papers for a period of at least eight years from the date of our report.

At the conclusion of our audit engagement, we will communicate to board of directors the following significant findings from the audit:

- Our view about the qualitative aspects of the entity's significant accounting practices;
- Significant difficulties, if any, encountered during the audit;
- Uncorrected misstatements, other than those we believe are trivial, if any;
- Disagreements with management, if any;
- Other findings or issues, if any, arising from the audit that are, in our professional judgment, significant and relevant to those charged with governance regarding their oversight of the financial reporting process;
- Material, corrected misstatements that were brought to the attention of management as a result of our audit procedures;
- Representations we requested from management;
- Management's consultations with other accountants, if any; and
- Significant issues, if any, arising from the audit that were discussed, or the subject of correspondence, with management.

The audit documentation for this engagement is the property of Eide Bailly LLP and constitutes confidential information. However, we may be requested to make certain audit documentation available to Washington State Auditor's Office and federal agencies and the U.S. Government Accountability Office pursuant to authority given to it by law or regulation. If requested, access to such audit documentation will be provided under the supervision of Eide Bailly LLP's personnel. Furthermore, upon request, we may provide copies of selected audit documentation to Washington State Auditor's Office. The Washington State Auditor's Office may intend, or decide, to distribute the copies of information contained therein to others, including other governmental agencies.

*Government Auditing Standards* require that we provide, upon request, a copy of our most recent external peer review report and any subsequent review reports to the party contracting for the audit. Accordingly, we will provide a copy of our most recent peer review report at your request.

## **MEDIATION**

Any disagreement, controversy or claim arising out of or related to any aspect of our services or relationship with you (hereafter a "Dispute") shall, as a precondition to litigation in court, first be submitted to mediation. In

mediation, the parties attempt to reach an amicable resolution of the Dispute with the aid of an impartial mediator. Mediation shall begin by service of a written demand. The mediator will be selected by mutual agreement. If we cannot agree on a mediator, one shall be designated by the American Arbitration Association ("AAA"). Mediation shall be conducted with the parties in person in Spokane, Washington. Each party will bear its own costs in the mediation. The fees and expenses of the mediator will be shared equally by the parties. Neither party may commence a lawsuit until the mediator declares an impasse.

#### **LIMITED INDEMNITY**

Eide Bailly LLP and its partners, affiliates, officers and employees (collectively "Eide Bailly") shall not be responsible for any misstatements in your financial statements that we may fail to detect as a result of misrepresentations or concealment of information by any of your owners, directors, officers or employees. You shall indemnify and hold Eide Bailly harmless from any claims, losses, settlements, judgments, awards, damages and attorneys' fees arising from any such misstatement or concealment of information.

If through no fault of Eide Bailly we are named as a party to a dispute between you and a third party, you shall indemnify and hold Eide Bailly harmless against any losses, damages, settlements, judgments, awards, and the costs of litigation (including attorneys' fees) we incur in connection with the dispute.

Eide Bailly shall not be entitled to indemnification under this agreement unless the services were performed in accordance with professional standards in all material respects.

#### **LIMITATION OF LIABILITY**

The exclusive remedy available to you for any alleged loss or damages arising from or related to Eide Bailly's services or relationship with you shall be the right to pursue claims for actual damages that are directly caused by Eide Bailly's breach of this agreement or Eide Bailly's violation of applicable professional standards. In no event shall Eide Bailly's aggregate liability to you exceed two times fees paid under this agreement, nor shall Eide Bailly ever be liable to you for incidental, consequential, punitive or exemplary damages, or attorneys' fees.

#### **TIME LIMITATION**

You may not bring any legal proceeding against Eide Bailly unless it is commenced within twenty-four (24) months ("Limitation Period") after the date when we delivered our report, return, or other deliverable under this agreement to you, regardless of whether we do other services for you or that may relate to the audit. The Limitation Period applies and begins to run even if you have not suffered any damage or loss, or have not become aware of a possible Dispute.

#### **GOVERNING LAW AND VENUE**

Any Dispute between us, including any Dispute related to the engagement contemplated by this agreement, shall be governed by Washington law. Any unresolved Dispute shall be submitted to a federal or state court located in Spokane, Washington.

#### **ASSIGNMENTS PROHIBITED**

You shall not assign, sell, barter or transfer any legal rights, causes of actions, claims or Disputes you may have against Eide Bailly to any person.

Please sign and return the attached copy of this letter to indicate your acknowledgment of, and agreement with, the arrangements for our audit of the financial statements including our respective responsibilities.

We appreciate the opportunity to be your certified public accountants and look forward to working with you and your staff.

Respectfully,

  
\_\_\_\_\_  
Kristin Diggs, Partner

RESPONSE:

This letter correctly sets forth our understanding.

Acknowledged and agreed on behalf of Pullman Community Montessori by:

Name: Laylah Sullivan

DocuSigned by:

  
\_\_\_\_\_  
6CF1A4E3B31B41E...

Title: Head of School

Date: 9/24/2022



## Finance Dashboard August 2022

	<b>Metric</b> <i>Description</i>	<b>Result</b>	<b>Goal</b>	<b>Status</b>	<b>Notes</b>
1.	<b>Current Student Recruitment Count</b> <i>Enrollment is the school's primary revenue driver</i>	99%	100%	○	Current enrollment: 66 (AAFTE: 72.7) Budget: 73.5 SPED: 10 budget, 11.22 actual
2.	<b>Public Revenue Received as a % of overall budget</b> <i>Measures rate of receipt of public funds to date</i>	93%	100%	○	<u>Variances:</u> -\$93k total – mostly Federal ESSER: -\$20k can claim in 22-23 CSP: -\$32k can claim in 22-23 E-rate/ECF: -\$30k – cannot claim
3.	<b>Private Revenue Received as a % of overall budget</b> <i>Measures progress against fundraising goals</i>	85%	92%	○	July WA Charters payment received in Sept; August WA Charters payment not received
4.	<b>Expenditures to date as a % of overall budget</b> <i>Measures actual spending against planned spending</i>	99.76%	100%	○	Variances below
5.	<b>Cash on Hand</b> <i>Measures operational and financial stability</i>	Current: \$149k	\$145k	○	FY21-22: should hit 30 days cash FY22-23: cash will need to be monitored

### Additional notes for discussion: The following accounts have material (\$10k) variances:

- Unfavorable variance: Federal misc grants (\$50k): e-rate/ECF (\$30k - lost revenue) + ESSER – (\$20k will claim in 22-23); CSP (\$32k - will claim in 22-23); SPED services (\$10k – due to student need); Office (\$14k – includes transactions missing documentation); Student recruitment (\$16k – needed & grant funded); Interest expense (\$26k – budget error)
- Favorable variances: Teacher salaries (\$24k – flex teacher not hired); Federal taxes (\$16k – budget error); SEBB / health insurance (\$22k – due to lower FTE); Audit (\$18k – expense occurs in following FY); Equipment/furniture (\$22k – not ordered yet); School meals (\$17k – budget too high)
- Current fiscal year count of missing documentation: ~\$31k.

jg<sup>P</sup>



### Payroll Check Summary

*Payroll Runs: 08/10/2022 and 08/25/2022*

#### BOARD CERTIFICATION STATEMENT

Payments have been audited and certified by the Auditing Officer as required by RCW 42.24.080, and those expense reimbursement claims certified as required by RCW 42.24.090. Those payments have been recorded on a listing which has been made available to the board.

As of September 27, 2022, the Board, by a \_\_\_\_\_ vote, approves payments totaling \$31,381.12. The payments are further identified in this document.

Total Payment by Type:

Payroll Direct Deposit (\$31,381.12)

Secretary	_____	Board Member	Ayad Rahmani
Board Member	John Cassleman	Board Member	_____
Board Member	Aubree Guyton	Board Member	_____
Board Member	Lauren Bruno		_____

### Accounts Payable Register

*August 2022*

#### BOARD CERTIFICATION STATEMENT

Payments have been audited and certified by the Auditing Officer as required by RCW 42.24.080, and those expense reimbursement claims certified as required by RCW 42.24.090. Those payments have been recorded on a listing which has been made available to the board.

As of September 27, 2022, the Board, by a \_\_\_\_\_ vote, approves payments totaling \$55,913.82. The payments are further identified in this document.

Total Payment by Type:

Electronic Funds Transfer (\$55,913.82)

Reimbursement Direct Deposit (\$0)

Secretary	_____	Board Member	Ayad Rahmani
Board Member	John Cassleman	Board Member	_____
Board Member	Aubree Guyton	Board Member	_____
Board Member	Lauren Bruno		_____

# Pullman Community Montessori

## Balance Sheet As of August 31, 2022

	TOTAL		
	AS OF AUG 31, 2022	AS OF JUL 31, 2022 (PP)	CHANGE
<b>ASSETS</b>			
Current Assets			
Bank Accounts			
1000 Banner Bank x4353 - PUBLIC Checking	147,086.26	162,066.87	-14,980.61
1001 Banner Bank x4695 - PRIVATE Checking	1,211.39	1,214.39	-3.00
1005 Banner Bank x3234 - PUBLIC Savings	1,095.53	1,095.51	0.02
<b>Total Bank Accounts</b>	<b>\$149,393.18</b>	<b>\$164,376.77</b>	<b>\$ -14,983.59</b>
Accounts Receivable			
1100 Accounts Receivable (A/R)	270,770.75	66,306.64	204,464.11
<b>Total Accounts Receivable</b>	<b>\$270,770.75</b>	<b>\$66,306.64</b>	<b>\$204,464.11</b>
Other Current Assets			
1150 Prepaids & Other Assets	15,402.44	17,167.22	-1,764.78
<b>Total Other Current Assets</b>	<b>\$15,402.44</b>	<b>\$17,167.22</b>	<b>\$ -1,764.78</b>
<b>Total Current Assets</b>	<b>\$435,566.37</b>	<b>\$247,850.63</b>	<b>\$187,715.74</b>
Fixed Assets			
1501 Fixed Assets-Capitalized Equipment	46,770.36	46,770.36	0.00
1503 Fixed Assets-Leasehold Improvements	488,558.97	391,802.62	96,756.35
1504 Fixed Assets-Furniture, Fixtures & Other	68,838.42	68,838.42	0.00
1510 Facilities - In Progress	1,500.00	98,256.35	-96,756.35
1550 Accumulated Depreciation	-66,056.50		-66,056.50
<b>Total Fixed Assets</b>	<b>\$539,611.25</b>	<b>\$605,667.75</b>	<b>\$ -66,056.50</b>
<b>TOTAL ASSETS</b>	<b>\$975,177.62</b>	<b>\$853,518.38</b>	<b>\$121,659.24</b>
<b>LIABILITIES AND EQUITY</b>			
Liabilities			
Current Liabilities			
Accounts Payable			
2100 Accounts Payable	49,202.33	19,472.57	29,729.76
<b>Total Accounts Payable</b>	<b>\$49,202.33</b>	<b>\$19,472.57</b>	<b>\$29,729.76</b>
Other Current Liabilities			
2101 Accrued Accounts & Payroll Payable	101,244.46	29,945.59	71,298.87
2155 Retirement Payable - DRS	7,503.05	8,119.33	-616.28
2156 Health Insurance Payable - SEBB	-15,711.00	-15,677.50	-33.50
2158 LTD Payable	114.63	90.55	24.08
2171 Use Tax Payable	1,228.94	1,226.43	2.51
<b>Total Other Current Liabilities</b>	<b>\$94,380.08</b>	<b>\$23,704.40</b>	<b>\$70,675.68</b>
<b>Total Current Liabilities</b>	<b>\$143,582.41</b>	<b>\$43,176.97</b>	<b>\$100,405.44</b>



# Pullman Community Montessori

## Balance Sheet As of August 31, 2022

	TOTAL		
	AS OF AUG 31, 2022	AS OF JUL 31, 2022 (PP)	CHANGE
Long-Term Liabilities			
2501 Construction Loan Payable	478,547.63	478,794.06	-246.43
<b>Total Long-Term Liabilities</b>	<b>\$478,547.63</b>	<b>\$478,794.06</b>	<b>\$ -246.43</b>
<b>Total Liabilities</b>	<b>\$622,130.04</b>	<b>\$521,971.03</b>	<b>\$100,159.01</b>
Equity			
2998 Unrestricted Net Assets	449,107.24	449,107.24	0.00
2999 Restricted Net Assets	3,350.00	3,350.00	0.00
Net Revenue	-99,409.66	-120,909.89	21,500.23
<b>Total Equity</b>	<b>\$353,047.58</b>	<b>\$331,547.35</b>	<b>\$21,500.23</b>
<b>TOTAL LIABILITIES AND EQUITY</b>	<b>\$975,177.62</b>	<b>\$853,518.38</b>	<b>\$121,659.24</b>

# Pullman Community Montessori

## Budget vs. Actuals: 21-22 Revised Budget - FY22 P&L

September 2021 - August 2022

	TOTAL			
	ACTUAL	BUDGET	OVER BUDGET	% OF BUDGET
<b>Revenue</b>				
3100 Local Donations	5,839.55	5,000.00	839.55	116.79 %
3102 Sales - Student Activities	3,466.37		3,466.37	
3201 Interest Income (Public)	0.22		0.22	
3520 Private Foundations / Grants	282,600.00	260,500.00	22,100.00	108.48 %
4000 General Apportionment	778,244.56	784,175.00	-5,930.44	99.24 %
4021 Special Education - General Apportionment	20,977.45	21,276.00	-298.55	98.60 %
4121 Special Education - State	93,914.71	94,758.00	-843.29	99.11 %
4155 Learning Assistance	12,522.85	13,012.00	-489.15	96.24 %
4174 Highly Capable	2,054.54	2,054.00	0.54	100.03 %
4198 State - School Food Service	1,222.94		1,222.94	
4258 State Miscellaneous Revenue		2,651.00	-2,651.00	
5101 Title 1	16,512.00	16,512.00	0.00	100.00 %
5102 Title 2	2,686.00	2,686.00	0.00	100.00 %
5124 Federal SPED - IDEA	16,730.00	15,036.00	1,694.00	111.27 %
5198 Federal - School Food Services (NSLP)	46,669.81	50,060.00	-3,390.19	93.23 %
5199 Federal - Misc Grants	119,679.42	170,161.00	-50,481.58	70.33 %
5200 Federal - CSP	265,981.16	298,184.00	-32,202.84	89.20 %
<b>Total Revenue</b>	<b>\$1,669,101.58</b>	<b>\$1,736,065.00</b>	<b>\$ -66,963.42</b>	<b>96.14 %</b>
<b>GROSS PROFIT</b>	<b>\$1,669,101.58</b>	<b>\$1,736,065.00</b>	<b>\$ -66,963.42</b>	<b>96.14 %</b>
<b>Expenditures</b>				
6005 Certificated - Executive Management	86,666.68	90,000.00	-3,333.32	96.30 %
6010 Certificated - Instructional Management	26,666.70	32,500.00	-5,833.30	82.05 %
6106 Classified - Operations Staff	58,805.14	49,815.00	8,990.14	118.05 %
6110 Classified - Instructional Management	3,250.02		3,250.02	
6190 Classified - Other - Non -Instructional	45,686.07	41,216.00	4,470.07	110.85 %
6198 Classified - Lunch Staff	27,726.84	26,000.00	1,726.84	106.64 %
6270 Certificated - Teachers - Regular	226,587.25	250,464.00	-23,876.75	90.47 %
6271 Certificated - Teachers - Substitutes	11,469.93	11,250.00	219.93	101.95 %
6275 Certificated - Teachers - SPED	65,615.71	64,499.00	1,116.71	101.73 %
6278 Certificated - Stipends	5,803.33		5,803.33	
6371 Classified - Teachers - Substitutes	786.21		786.21	
6373 Classified - Aides - Regular	83,858.96	78,188.00	5,670.96	107.25 %
7051 Social Security/Medicare/FUTA	37,681.98	53,949.00	-16,267.02	69.85 %
7052 Worker's Compensation Insurance	5,059.31	6,539.00	-1,479.69	77.37 %
7053 State Unemployment	8,336.12	9,025.00	-688.88	92.37 %
7054 Paid Family Medical Leave		1,635.00	-1,635.00	
7055 Retirement Contribution - DRS	81,884.56	88,434.00	-6,549.44	92.59 %
7056 Health Insurance - SEBB	128,744.00	151,008.00	-22,264.00	85.26 %
8005 Audits		18,000.00	-18,000.00	
8010 Legal	1,299.74	5,000.00	-3,700.26	25.99 %
8015 Oversight Fee (3%)	27,282.03	27,458.00	-175.97	99.36 %

# Pullman Community Montessori

## Budget vs. Actuals: 21-22 Revised Budget - FY22 P&L

September 2021 - August 2022

	TOTAL			
	ACTUAL	BUDGET	OVER BUDGET	% OF BUDGET
8035 Payroll & Accounting Services	97,431.50	96,000.00	1,431.50	101.49 %
8040 Special Ed Services	48,552.99	38,020.00	10,532.99	127.70 %
8050 Contracted Services - Tech	23,224.30	22,000.00	1,224.30	105.57 %
8051 Contracted Services - Program Support / PD	19,700.00	25,000.00	-5,300.00	78.80 %
8052 Contracted Services - Instructional	2,433.13		2,433.13	
8053 Contracted Services - Misc	65,520.00	65,000.00	520.00	100.80 %
8054 Contracted Services - Afterschool	28,380.37	27,316.00	1,064.37	103.90 %
8055 Printing	1,747.85	2,500.00	-752.15	69.91 %
8060 Dues & Memberships	2,701.76	2,000.00	701.76	135.09 %
8505 Board Expenses	11,500.00	11,250.00	250.00	102.22 %
8510 Classroom / Teaching Supplies & Materials	67,225.82	60,500.00	6,725.82	111.12 %
8515 Special Ed Supplies & Materials	1,238.77	4,725.00	-3,486.23	26.22 %
8520 Textbooks / Workbooks	3,884.66	5,250.00	-1,365.34	73.99 %
8526 COVID-19 Expenses	702.19		702.19	
8530 Equipment / Furniture	24,523.83	46,710.00	-22,186.17	52.50 %
8535 Telephone / Internet	8,692.29	7,680.00	1,012.29	113.18 %
8540 Technology - Hardware	13,172.64	17,206.00	-4,033.36	76.56 %
8541 Technology - Software	26,990.45	24,450.00	2,540.45	110.39 %
8545 Student Testing & Assessment		3,225.00	-3,225.00	
8550 Field Trips	4,071.75	6,650.00	-2,578.25	61.23 %
8561 Student Activities		1,750.00	-1,750.00	
8564 Bank & Payment Processing Fees	3,369.30		3,369.30	
8565 Office Expense	22,249.81	8,000.00	14,249.81	278.12 %
8570 Staff Development	9,695.89	12,420.00	-2,724.11	78.07 %
8575 Staff Recruitment	4,237.61	2,000.00	2,237.61	211.88 %
8580 Student Recruitment / Marketing	16,288.76	3,000.00	13,288.76	542.96 %
8585 School Meals / Lunch	43,336.31	60,511.00	-17,174.69	71.62 %
8590 Travel (Staff)	1,165.09	300.00	865.09	388.36 %
8595 Fundraising	502.03	5,000.00	-4,497.97	10.04 %
8599 Transportation (student)	6,756.00	15,000.00	-8,244.00	45.04 %
9005 Insurance Expense	10,944.02	12,500.00	-1,555.98	87.55 %
9010 Janitorial	1,517.01	4,053.00	-2,535.99	37.43 %
9015 Building and Land Rent / Lease	168,776.37	159,238.00	9,538.37	105.99 %
9020 Repairs & Maintenance Bld	1,868.51	3,000.00	-1,131.49	62.28 %
9045 Interest Expense	26,843.15	577.00	26,266.15	4,652.19 %
<b>Total Expenditures</b>	<b>\$1,702,454.74</b>	<b>\$1,757,811.00</b>	<b>\$ -55,356.26</b>	<b>96.85 %</b>
NET OPERATING REVENUE	<b>\$ -33,353.16</b>	<b>\$ -21,746.00</b>	<b>\$ -11,607.16</b>	<b>153.38 %</b>
Other Expenditures				
9050 Depreciation	66,056.50	94,883.00	-28,826.50	69.62 %
<b>Total Other Expenditures</b>	<b>\$66,056.50</b>	<b>\$94,883.00</b>	<b>\$ -28,826.50</b>	<b>69.62 %</b>
NET OTHER REVENUE	<b>\$ -66,056.50</b>	<b>\$ -94,883.00</b>	<b>\$28,826.50</b>	<b>69.62 %</b>
NET REVENUE	<b>\$ -99,409.66</b>	<b>\$ -116,629.00</b>	<b>\$17,219.34</b>	<b>85.24 %</b>

# Pullman Community Montessori

Budget vs. Actuals: 21-22 Revised Budget - FY22 P&L

September 2021 - August 2022

# Pullman Community Montessori

## Statement of Cash Flows

June - August, 2022

	JUN 2022	JUL 2022	AUG 2022	TOTAL
<b>OPERATING ACTIVITIES</b>				
Net Revenue	-16,292.05	13,647.77	21,500.23	\$18,855.95
Adjustments to reconcile Net Revenue to Net Cash provided by operations:				\$0.00
1100 Accounts Receivable (A/R)	508.48	-4,449.40	-204,464.11	\$ - 208,405.03
1150 Prepaids & Other Assets	-9,203.40	-5,843.40	1,764.78	\$ -13,282.02
1550 Accumulated Depreciation			66,056.50	\$66,056.50
2100 Accounts Payable	29,746.62	-17,687.42	29,729.76	\$41,788.96
2101 Accrued Accounts & Payroll Payable	-6,772.26	-1,355.56	71,298.87	\$63,171.05
2155 Retirement Payable - DRS	421.93	-2,472.73	-616.28	\$ -2,667.08
2156 Health Insurance Payable - SEBB	531.00	1,552.50	-33.50	\$2,050.00
2158 LTD Payable	3.25	-28.00	24.08	\$ -0.67
2171 Use Tax Payable		797.74	2.51	\$800.25
<b>Total Adjustments to reconcile Net Revenue to Net Cash provided by operations:</b>	<b>15,235.62</b>	<b>-29,486.27</b>	<b>-36,237.39</b>	<b>\$ -50,488.04</b>
<b>Net cash provided by operating activities</b>	<b>\$ - 1,056.43</b>	<b>\$ - 15,838.50</b>	<b>\$ - 14,737.16</b>	<b>\$ -31,632.09</b>
<b>INVESTING ACTIVITIES</b>				
1503 Fixed Assets-Leasehold Improvements			-96,756.35	\$ -96,756.35
1510 Facilities - In Progress	-1,500.00	-1,050.54	96,756.35	\$94,205.81
<b>Net cash provided by investing activities</b>	<b>\$ - 1,500.00</b>	<b>\$ -1,050.54</b>	<b>\$0.00</b>	<b>\$ -2,550.54</b>
<b>FINANCING ACTIVITIES</b>				
2501 Construction Loan Payable	1,997.02	-314.52	-246.43	\$1,436.07
2998 Unrestricted Net Assets		-1,150.00		\$ -1,150.00
2999 Restricted Net Assets		1,150.00		\$1,150.00
<b>Net cash provided by financing activities</b>	<b>\$1,997.02</b>	<b>\$ -314.52</b>	<b>\$ -246.43</b>	<b>\$1,436.07</b>
<b>NET CASH INCREASE FOR PERIOD</b>	<b>\$ -559.41</b>	<b>\$ - 17,203.56</b>	<b>\$ - 14,983.59</b>	<b>\$ -32,746.56</b>

# Pullman Community Montessori

## Profit and Loss

August 2022

	TOTAL			
	AUG 2022	JUL 2022 (PP)	CHANGE	SEP 2021 - AUG 2022 (YTD)
<b>Revenue</b>				
3100 Local Donations		1,115.00	-1,115.00	5,839.55
3102 Sales - Student Activities		120.00	-120.00	3,466.37
3201 Interest Income (Public)	0.02	0.02	0.00	0.22
3520 Private Foundations / Grants	177,600.00		177,600.00	282,600.00
4000 General Apportionment	42,613.69	102,170.96	-59,557.27	778,244.56
4021 Special Education - General Apportionment	1,227.54	2,743.05	-1,515.51	20,977.45
4121 Special Education - State	4,510.87	12,417.20	-7,906.33	93,914.71
4155 Learning Assistance	547.87	1,663.19	-1,115.32	12,522.85
4174 Highly Capable	117.42	269.04	-151.62	2,054.54
4198 State - School Food Service				1,222.94
5101 Title 1	2,440.00	7,101.82	-4,661.82	16,512.00
5102 Title 2	742.00		742.00	2,686.00
5124 Federal SPED - IDEA	5,161.42		5,161.42	16,730.00
5198 Federal - School Food Services (NSLP)		1,629.65	-1,629.65	46,669.81
5199 Federal - Misc Grants	3,052.80	2,880.00	172.80	119,679.42
5200 Federal - CSP	38,820.70	15,777.84	23,042.86	265,981.16
<b>Total Revenue</b>	<b>\$276,834.33</b>	<b>\$147,887.77</b>	<b>\$128,946.56</b>	<b>\$1,669,101.58</b>
<b>GROSS PROFIT</b>	<b>\$276,834.33</b>	<b>\$147,887.77</b>	<b>\$128,946.56</b>	<b>\$1,669,101.58</b>
<b>Expenditures</b>				
6005 Certificated - Executive Management	3,750.00	7,500.00	-3,750.00	86,666.68
6010 Certificated - Instructional Management				26,666.70
6106 Classified - Operations Staff	11,643.18	5,956.80	5,686.38	58,805.14
6110 Classified - Instructional Management	3,250.02		3,250.02	3,250.02
6190 Classified - Other - Non -Instructional	4,245.75	1,123.00	3,122.75	45,686.07
6198 Classified - Lunch Staff	1,667.47	0.00	1,667.47	27,726.84
6270 Certificated - Teachers - Regular	33,230.29	17,663.10	15,567.19	226,587.25
6271 Certificated - Teachers - Substitutes		0.00	0.00	11,469.93
6275 Certificated - Teachers - SPED	5,853.95	5,374.92	479.03	65,615.71
6278 Certificated - Stipends	5,083.33		5,083.33	5,803.33
6371 Classified - Teachers - Substitutes				786.21
6373 Classified - Aides - Regular	7,349.08	173.00	7,176.08	83,858.96
7051 Social Security/Medicare/FUTA	4,207.66	2,540.73	1,666.93	37,681.98
7052 Worker's Compensation Insurance	518.56	236.46	282.10	5,059.31
7053 State Unemployment	1,038.63	296.73	741.90	8,336.12
7055 Retirement Contribution - DRS	8,195.73	4,975.42	3,220.31	81,884.56
7056 Health Insurance - SEBB	8,712.00	8,712.00	0.00	128,744.00
8010 Legal	798.00		798.00	1,299.74
8015 Oversight Fee (3%)	1,501.69	3,580.60	-2,078.91	27,282.03
8035 Payroll & Accounting Services	8,000.00	8,000.00	0.00	97,431.50

# Pullman Community Montessori

## Profit and Loss

August 2022

	TOTAL			
	AUG 2022	JUL 2022 (PP)	CHANGE	SEP 2021 - AUG 2022 (YTD)
8040 Special Ed Services	2,000.00	4,520.32	-2,520.32	48,552.99
8050 Contracted Services - Tech	1,435.07	151.06	1,284.01	23,224.30
8051 Contracted Services - Program Support / PD	691.66	4,558.40	-3,866.74	19,700.00
8052 Contracted Services - Instructional				2,433.13
8053 Contracted Services - Misc	8,125.00	8,125.00	0.00	65,520.00
8054 Contracted Services - Afterschool				28,380.37
8055 Printing				1,747.85
8060 Dues & Memberships				2,701.76
8505 Board Expenses	833.33	833.37	-0.04	11,500.00
8510 Classroom / Teaching Supplies & Materials	26,270.89	7,506.87	18,764.02	67,225.82
8515 Special Ed Supplies & Materials	59.16		59.16	1,238.77
8520 Textbooks / Workbooks				3,884.66
8526 COVID-19 Expenses	66.90		66.90	702.19
8530 Equipment / Furniture	7,285.34	8,684.99	-1,399.65	24,523.83
8535 Telephone / Internet	310.90	910.90	-600.00	8,692.29
8540 Technology - Hardware	545.67		545.67	13,172.64
8541 Technology - Software	1,743.77	3,635.44	-1,891.67	26,990.45
8550 Field Trips				4,071.75
8564 Bank & Payment Processing Fees	88.25	3,044.34	-2,956.09	3,369.30
8565 Office Expense	4,924.84	1,805.47	3,119.37	22,249.81
8570 Staff Development		-259.82	259.82	9,695.89
8575 Staff Recruitment	1,642.06	1,018.88	623.18	4,237.61
8580 Student Recruitment / Marketing	3,621.78	3,341.84	279.94	16,288.76
8585 School Meals / Lunch	34.50		34.50	43,336.31
8590 Travel (Staff)	1,069.51		1,069.51	1,165.09
8595 Fundraising				502.03
8599 Transportation (student)	234.00		234.00	6,756.00
9005 Insurance Expense	1,270.69	893.16	377.53	10,944.02
9010 Janitorial				1,517.01
9015 Building and Land Rent / Lease	14,042.42	14,042.42	0.00	168,776.37
9020 Repairs & Maintenance Bld	1,661.45	99.26	1,562.19	1,868.51
9045 Interest Expense	2,275.07	5,195.34	-2,920.27	26,843.15
<b>Total Expenditures</b>	<b>\$189,277.60</b>	<b>\$134,240.00</b>	<b>\$55,037.60</b>	<b>\$1,702,454.74</b>
<b>NET OPERATING REVENUE</b>	<b>\$87,556.73</b>	<b>\$13,647.77</b>	<b>\$73,908.96</b>	<b>\$ -33,353.16</b>
Other Expenditures				
9050 Depreciation	66,056.50		66,056.50	66,056.50
<b>Total Other Expenditures</b>	<b>\$66,056.50</b>	<b>\$0.00</b>	<b>\$66,056.50</b>	<b>\$66,056.50</b>
<b>NET OTHER REVENUE</b>	<b>\$ -66,056.50</b>	<b>\$0.00</b>	<b>\$ -66,056.50</b>	<b>\$ -66,056.50</b>
<b>NET REVENUE</b>	<b>\$21,500.23</b>	<b>\$13,647.77</b>	<b>\$7,852.46</b>	<b>\$ -99,409.66</b>



## Pullman Community Montessori FY 21-22 Budget Status Report Aug-22

	Total			
	Actual	Budget	Over/(Under) Budget	% Received / Spent
<b>Revenue</b>				
Local Support	9,306.14	5,000.00	4,306.14	186.12%
State Revenue - General	778,244.56	784,175.00	-5,930.44	99.24%
State Revenue - Special Purpose	130,692.49	133,751.00	-3,058.51	97.71%
Federal Revenue	468,258.39	552,639.00	-84,380.61	84.73%
Grants & Other Sources	282,600.00	260,500.00	22,100.00	108.48%
<b>Total Revenue</b>	<b>\$ 1,669,101.58</b>	<b>\$ 1,736,065.00</b>	<b>-\$ 66,963.42</b>	<b>96.14%</b>
<b>Gross Profit</b>	<b>\$ 1,669,101.58</b>	<b>\$ 1,736,065.00</b>	<b>-\$ 66,963.42</b>	<b>96.14%</b>
<b>Expenditures</b>				
Salaries	642,922.84	643,932.00	-1,009.16	99.84%
Personnel Taxes & Benefits	261,705.97	310,590.00	-48,884.03	84.26%
Contracted Services	313,824.06	323,794.00	-9,969.94	96.92%
School Operations	268,505.45	236,211.00	32,294.45	113.67%
Facility Operations & Maintenance	209,949.06	179,368.00	30,581.06	117.05%
<b>Total Expenditures</b>	<b>\$ 1,696,907.38</b>	<b>\$ 1,693,895.00</b>	<b>\$ 3,012.38</b>	<b>100.18%</b>
<b>Net Operating Revenue</b>	<b>-\$ 27,805.80</b>	<b>\$ 42,170.00</b>	<b>-\$ 69,975.80</b>	<b>-65.94%</b>
<b>Net Revenue</b>	<b>-\$ 27,805.80</b>	<b>\$ 42,170.00</b>	<b>-\$ 69,975.80</b>	<b>-65.94%</b>
<b>Capital &amp; Loan Expenditures</b>				
1501 Fixed Assets-Capitalized Equipment (Tech)	5,547.36	17,206.00	-11,658.64	32.24%
1503 Fixed Assets-Leasehold Improvements	103,894.86	56,369.00	47,525.86	184.31%
1504 Fixed Assets-Furniture, Fixtures & Other	0.00	46,710.00	-46,710.00	0.00%
Loan Payable - short & long term	67,416.06	64,048.00	3,368.06	105.26%
<b>Total Capital &amp; Loan Expenditures</b>	<b>176,858.28</b>	<b>184,333.00</b>	<b>-7,474.72</b>	<b>95.94%</b>
<b>All Expenditures</b>	<b>1,873,765.66</b>	<b>1,878,228.00</b>	<b>-4,462.34</b>	<b>99.76%</b>
<b>Total Expenditures (incl balance sheet)</b>	<b>1,873,766</b>			
<b>Board Approved Expenditures</b>	<b>1,973,110</b>			



AUDITING OFFICER CERTIFICATION AND APPROVAL  
(CHAPTER 42.24 RCW)

I, the undersigned, do hereby certify under penalty of perjury for the following vouchers, that the materials have been furnished, the services rendered or the labor performed as described herein and that the claim is a just, due and unpaid obligation against Pullman Community Montessori, and that I am authorized to authenticate and certify so said claim.

Pullman Community Montessori General Fund

August AP register totaling: \$55,913.82

Pay dates within 08/01/22 - 08/31/22

Board Date 09/27/22

\_\_\_\_\_  
Signature of Auditing Officer

\_\_\_\_\_  
Date

# Pullman Community Montessori

## Bill Payment List

August 2022

DATE	NUM	VENDOR	AMOUNT	MEMO/DESCRIPTION
1000 Banner Bank x4353 - PUBLIC Checking				
08/01/2022		Nathaniel A Porter	-22.00	Inv #6/1 - 6/15
08/03/2022	EFT	Joule Growth Partners	-8,000.00	
08/04/2022		Ccooper Services	-145.00	Inv #5343
08/05/2022		Community Playthings	-5,146.84	Inv #S802Y
08/04/2022		First Step Internet	-300.00	Inv #1651291
08/04/2022		Issaquah School District	-84.00	Inv #0000514104
08/04/2022		Pratt Moving & Storage	-521.00	Inv #7055
08/04/2022		Raza Development Fund, Inc (v)	-3,000.00	Inv #611-01-02 - Extension
08/04/2022		Teton Science Schools	-8,300.00	Inv #22-23
08/04/2022		The Standard Insurance Company	-90.55	Inv #756494 0314 7/1
08/04/2022		WA State Charter Schools Association	-2,521.50	Inv #1856
08/04/2022	EFT	Friends of Gladish	-14,042.42	
08/08/2022	EFT	WA Dept of Retirement Systems	-8,205.16	
08/08/2022	EFT	WA Dept of Retirement Systems	-6.18	
08/09/2022	EFT	Great American Insurance Group	-653.33	
08/19/2022		Galexis Technologies	-603.68	Inv #31716-- bill.com Check Number: 65258008
08/19/2022		Wellfleet Group, LLC	-470.76	Inv #H000914
08/19/2022		Nathaniel A Porter	-3,801.40	multiple invoices
<b>Total for 1000 Banner Bank x4353 - PUBLIC Checking</b>			<b>\$ -55,913.82</b>	

## Pullman Community Montessori Payroll Summary

Aug-22



### Pay Code Totals

Custodian	-
Kitchen Staff	-
Office Administration	9,661.97
School Administration	7,500.00
Special Education Staff	5,374.92
Student Support Staff	467.10
Substitute Teacher	-
Teacher	17,663.10
<b>Total</b>	<b>40,667.09</b>

### Deduction Totals

State Pension	2,585.38
State Employees Benefits Board	1,166.50
Supplemental LTD	114.63
Wage Garnishments	-
Federal Income Tax	2,358.28
Social Security	2,162.39
Medicare	572.76
WA Long Term Care Insurance	-
WA Workers' Comp Insurance	147.38
WA Family and Medical Leave Insurance	178.65
<b>Total</b>	<b>9,285.97</b>

### Benefits Totals

State Pension	5,009.68
State Employees Benefits Board	10,164.00
Social Security	2,162.39
Medicare	572.76
WA SUI	549.03
WA EAF	8.13
WA Family and Medical Leave Insurance	-
WA Workers' Comp Insurance	265.46
<b>Total</b>	<b>18,731.45</b>

**Direct Deposit Total** **31,381.12**

# Coversheet

## Equity Plan

<b>Section:</b>	V. Action Items
<b>Item:</b>	A. Equity Plan
<b>Purpose:</b>	Vote
<b>Submitted by:</b>	
<b>Related Material:</b>	PCM Comprehensive Equity Plan 2022-23.pdf Comprehensive Equity Plan Rubric.docx



## PCM Comprehensive Equity Plan

### About Our School & Community

At Pullman Community Montessori (PCM) we believe ALL students deserve the opportunity to have the education that works best for them! PCM's K-9th grade program offers whole-child education personalized to students' needs that prepares them, through rigorous academics, a robust social emotional program, and career and life skill development.

The Mission: PCM endeavors to prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community.

The Vision: PCM seeks to serve as an instrument of change, helping to progress our education system to better meet the needs of students, families, and educators.

Our 6 Pillars; *Cultivating collaborative leaders, Respecting the child, Self-empowered lifelong learners, Our place, our Community, Families as partners, and Teachers as leaders and change makers*; serve as our foundation for maintaining our environment and community. PCM's core values, *We are LEADERS*, serves as a blueprint of actions to create and reinforce the habits and language that support an environment of diversity, equity, and inclusion, where differences are valued and accountability, integrity, character, and a growth mindset are fostered. Our expectations that all participants of PCM's community—students, teachers, staff, and parents—uphold and support our core values, display our high standards for all and our intent to expand community beyond our classroom walls.

What defines a PCM graduate:

- **Creative Expression:** Graduates of PCM are creative individuals who are well-versed in creation and presentation of artistic forms. These individuals can build, make, and code as well as draw and perform. By design, skills learned through Creative Expression are applied across the Impact Projects.
- **Health and Wellness:** Graduates of PCM understand that healthy living includes diet choices, physical activity, and awareness of mental health. Through personal actions, leadership, and projects, graduates will support the health and wellness of themselves and the surrounding community. Smart and safe technology use is embedded through an understanding of neuroscience and mental health.
- **Life and Career Skills:** Graduates of PCM possess a strong base in life skills and have begun to build base skills that will make them successful in any career field. Career exploration has begun and students have field tested some of their interests through community shadowing.
- **Character and Leadership:** Graduates of PCM will demonstrate leadership and self-awareness habits to gain personal and professional success as well as positive impact in the world. These students will be self-aware life-long learners who can actively collaborate and communicate to effectively make an impact.



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- **Mathematical Thinking and Analysis:** Core proficiency in both the content and skills involved in mathematics will be mastered by PCM graduates. These students will see how mathematics can be applied through real-world projects, act as a lens to understand the world, and transfer into a set of critical skills.
- **Scientific Literacy:** Graduates of PCM understand that science is a process through which we can understand the complexity of the world. They will be well-versed in basic science principles and constructs so as to critically analyze and understand the world around them.
- **Effective Communication:** Graduates of PCM can articulate themselves through written and verbal communication, speak coherently in a non-native language, build solid arguments from evidence, and discern the difference between fact and opinion.
- **Civic Purpose, Impact, and Agency:** Graduates of PCM understand how culture impacts community through history, economics, geography, and place. As developing young adults they will be well-versed in concepts of finance, equity, conflict, and resolution. Students at PCM understand the ecology, culture, and economy of our place and how to be engaged in our community, knowing that they have agency to give back and make a positive impact.
- **Cultural Competence:** Graduates of PCM will be knowledgeable of multiple cultures, develop empathy to collaborate with identities and cultures both locally and globally.

Category	Student %	
	PSD	PCM
<b>Disaggregated by race</b>		
White	69	60
Hispanic/Latino	11	13
Asian	9	11
Two or more races	7	10
Black/African American	3	5
<b>Disaggregated by at-risk category</b>		
Low income	34	40
Students with disabilities	14	19
Students with 504's	6	8
ELL's	6	8

Our community, Pullman, is the largest city in rural Whitman County, Washington, with a population of 32.4K; 37.5% of residents are estimated to be living below the poverty line (greater than both the state and national average). Pullman School District (PSD), the only public option, serves nearly 3,000 students. The student population distributions outlined in the table can be reasonably predicted for PCM in contrast with PSD. While our demographics will be similar, we anticipate our "at-risk" demographics will be somewhat higher, particularly in ethnic diversity, compared to PSD.

### Commitment to Equity

#### Grounding Statement

PCM will created and maintain an environment of diversity, equity, and inclusion, where differences are valued and accountability, integrity, character, and a growth mindset are fostered. In this commitment PCM will be an anti-biased, anti-racist organization that works to actively dismantle systematic biases and racism by reducing disadvantage in the school system. All members of PCM should be valued, represented, and feel that they have equitable opportunities and support to achieve their potential.

#### System-wide Commitment to Equity



Knowing that a peaceful community is only possible when we work together to dismantle systems that traditionally oppress child health, development, and education, PCM is committed to understanding that Pullman and the Montessori method were created in a culture that centers and prioritizes the needs and experiences of people with white skin. By understanding this history and the ways in which it limits every child's potential, PCM will make decisions and take action, in ways that validate, protect, honor, and celebrate the experiences and voices of minoritized individuals and nondominant cultures. By using the tools of equity and compassion, we can advance our purpose in supporting social change, justice, and equality for all students, families, and educators.

Adults in the PCM school community, including Guides, Instructional Assistants, Specialized Staff, Volunteers, Contracted Support, Support Staff, Administrators, Parents/Guardians, and Board of Trustees members ensure access to an equitable education for all races, religion, age, assigned sex at birth, gender expression, gender identity, sexual orientation, ethnicity, national origin, abilities, disabilities, the terms of an individualized education program, income level, language proficiency, and neurodiversity.

The Montessori prepared environment is composed of trained adults, children, and the physical environment with materials. Students learn daily through constructive experiences in this mindfully prepared environment. The environment is continuously examined through an equity lens. Barriers are removed in order for students to manifest their unique potential and contribute to a global peaceful society.

Equity in the prepared environment creates a space in which each student feels safe, seen, heard, represented, understood, and worthy. Through this process, we strive to remove institutional barriers, policies, and procedures to disrupt predictable student outcomes based on race, religion, age, assigned sex at birth, gender expression, gender identity, sexual orientation, ethnicity, national origin, abilities, disabilities, the terms of an individualized education program, income level, language proficiency, neurodiversity, and all other distinguishing characteristics in order to become an antiracist community. To achieve equity, PCM student success is not predicted or predetermined by their perceived or actual status – or the perceived or actual status of other persons with whom the student is associated.

Equity in education is about inclusiveness and social justice and not to be used interchangeably with principles of equality. The principle of educational equity goes beyond formal equality where all students are treated the same. Instead, educational equity is achieved by acknowledging that systemic institutional policies and practices can act as barriers to success. The next step is to identify, examine, and remove these barriers to create concrete conditions that will lead to access and opportunity for every student. Educational equity creates the environment to maximize the quality of the educational experiences and outcomes for each student and among historically minoritized groups of students. Equity strategies are intentional, systemic, funded, and focused on the core of the teaching and learning process.



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Antiracist Leadership			
Initiative	Roles Responsible	Timeline	Resources
Policy and procedure annual review with a culturally competent, racial equity toolkit.	<i>School Board School Leader Leadership Team</i>	March 2021	<a href="#">PSESD Racial Equity Toolkit</a> <a href="#">WSSDA Model Policies</a> <a href="#">Designing for Racial Equity</a>
Maintain a weighted enrollment preference (FRLP) and maintain an inclusive marketing campaign that reaches economically disadvantaged groups and other high-risk subgroups in Pullman and surrounding local areas (Colfax, Palouse)	<i>School Board School Leader</i>	Aug 2021	
Employment of the updated EER (Essential Elements of Montessori in the Public Sector)	<i>School Board School Leader Leadership Team</i>	Annually	<a href="#">EER</a>
Identify and secure a DEI contractor to provide ongoing professional development to the board of trustees and school staff	<i>School Leader Leadership Team</i>	August 2021	In negotiations with <a href="#">Luna Jiminez</a> <a href="#">Institute for Social Transformation</a> with reflection support by LaTysa Flowers.
Participate in NCMPs TIE IN	<i>Administrative Team</i>	Winter 2023	<a href="#">Application</a>
Establish a transportation system	<i>School Leader</i>	Aug 2021	
Culturally Humble and Inclusive Instructional Practices			
Initiative	Roles Responsible	Timeline	Resources
DEI and Cultural Humility Trainings			Predicted: Ijst supported by LaTysa and Jill Stansbury
Montessori curriculum applied through a lens of decolonization, cultural humility, and anti-bias, anti-racism.			<a href="#">Learning for Justice Framework</a> and resources Suggested by Ijst as well
Accessible Materials			<a href="#">National Center on Accessible Educational Materials</a>
Human Resources			
Initiative	Roles Responsible	Timeline	Resources
Collect and analyze qualitative and quantitative data	<i>Administrative Team Leadership Team</i>		<a href="#">Public Sector Jobs: Steps for Advancing Racial Equity</a>





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Community Collaboration			
Initiative	Roles Responsible	Timeline	Resources
Create and maintain a diverse Asset Map for connection	School Board School Leader Leadership Team	December 2022	TSS Place-Network
Bring in community experts and representation to add authentic voice and expand understanding of 'place'	<i>Administrative Team Leadership Team</i>	Ongoing	<a href="#">TELSO</a> , <a href="#">Learning for Justice</a>
Create learning resources to ensure students leave with a basic understanding of the history of the Palouse region and of the native peoples who historically and currently reside in and around Pullman.	Leadership Team		WSU Tribal Relations
Parent and Family Engagement			
Initiative	Roles Responsible	Timeline	Resources
Create and maintain three core Councils at minimum	Administrative Team	November 2022	Charter
Conduct a robust family survey at least once per year to evaluate school performance	Administrative Team	Annually	
Communications			
Initiative	Roles Responsible	Timeline	Resources
Language Access	Administrative Team Office Team	Ongoing	(expand options by December 2022)
Anti-tokenism	Administrative Team	Ongoing	<a href="#">TELSO</a> , <a href="#">Learning for Justice</a>
Funding			
Initiative	Roles Responsible	Timeline	Resources
General Fund	School Leader	Ongoing	

Date of School Board Approval:

Board Chair Signature

School Leader Signature

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



## Comprehensive Equity Plan Rubric

School Community			
Topic	1 – Does not meet	2 - Meets	3 - Exceeds
About our School	Missing any of the following: <ul style="list-style-type: none"> <li>• Student demographics</li> <li>• Community, family and student engagement</li> <li>• Home Languages</li> <li>• Mission, vision &amp; values</li> <li>• Information about the broader community where the school is located</li> </ul>	About our school includes: <ul style="list-style-type: none"> <li>• Student demographics</li> <li>• Community, family and student engagement</li> <li>• Home Languages</li> <li>• Mission, vision &amp; values</li> <li>• Information about the broader community where the school is located</li> </ul>	Exceeds level 2 by including citations to the data points (e.g. parent family survey, translated enrollment forms, etc)
	Description of Evidence:		
Commitment to equity	Missing any of the following: <ul style="list-style-type: none"> <li>• Community, family and student input through a formal process</li> <li>• Consideration for the unique needs of their school community within the broader community and globally.</li> <li>• Identifies opportunity gaps that effect the school community</li> <li>• Commitment to reducing and eventually eliminating the gaps.</li> <li>• Commitment to annually revisiting the plan and the</li> </ul>	The commitment to equity includes: <ul style="list-style-type: none"> <li>• Community, family and student input through a formal process</li> <li>• Consideration for the unique needs of their school community within the broader community and globally.</li> <li>• Identifies opportunity gaps that effect the school community</li> <li>• Commitment to reducing and eventually eliminating the gaps.</li> <li>• Commitment to annually revisiting the plan and the</li> </ul>	Exceeds level 2 by including clear rationale and data citations that ground the plan.

	measurable initiatives set forth within. <ul style="list-style-type: none"> <li>Accountability structure included</li> </ul>	measurable initiatives set forth within. <ul style="list-style-type: none"> <li>Accountability structure included</li> </ul>	
	<b>Description of Evidence:</b>		
<b>Definitions</b>	The Definitions section will be at a level 1 if it is missing a definition for any specific term that could be misunderstood without a clear definition within the school's context. Examples listed in level 2.	Includes school specific definitions for the following (if applicable): <ul style="list-style-type: none"> <li>Accessible materials</li> <li>Antiracist/Antiracism</li> <li>Cultural humility</li> <li>Decolonized curriculum</li> <li>Diversity</li> <li>Equity</li> <li>Inclusion/Inclusive practices</li> <li>Other school or model specific terms that could be misunderstood without a clear definition within the school's context.</li> <li>Citations</li> </ul>	
	<b>Description of evidence:</b>		

Antiracist Leadership		
1 – Does not meet	2 – Meets	3 - Exceeds
Missing any of the following: <ul style="list-style-type: none"> <li>Measurable initiative aligned to antiracist leadership</li> <li>Clear timeline established</li> <li>Resources included</li> <li>Roles assigned</li> <li>Less than 2 initiatives</li> </ul>	Includes all of the following: <ul style="list-style-type: none"> <li>Measurable initiative aligned to antiracist leadership</li> <li>Clear timeline established</li> <li>Resources included</li> <li>Roles assigned</li> <li>A minimum of 2 initiatives</li> </ul>	Exceeds level 2 by citing a clear connection to the specific school/community need.
Culturally Humble and Inclusive Practices		
1 – Does not meet	2 – Meets	3 - Exceeds
Includes all of the following: <ul style="list-style-type: none"> <li>Measurable initiative aligned to culturally humble and inclusive practices</li> <li>Clear timeline established</li> <li>Resources included</li> <li>Roles assigned</li> </ul>	Includes all of the following: <ul style="list-style-type: none"> <li>Measurable initiative aligned to culturally humble and inclusive practices</li> <li>Clear timeline established</li> <li>Resources included</li> <li>Roles assigned</li> </ul>	Exceeds level 2 by citing a clear connection to the specific school/community need

• Less than 2 initiatives	• A minimum of 2 initiatives	
<b>Human Resources</b>		
<b>1 – Does not meet</b>	<b>2 – Meets</b>	<b>3 - Exceeds</b>
Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to Human Resources</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• Less than 2 initiatives</li> </ul>	Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to Human Resources</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• A minimum of 2 initiatives</li> </ul>	Exceeds level 2 by citing a clear connection to the specific school/community need
<b>Parent and Family Engagement</b>		
<b>1 – Does not meet</b>	<b>2 – Meets</b>	<b>3 - Exceeds</b>
Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to parent and family engagement</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• Less than 2 initiatives</li> </ul>	Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to parent and family engagement</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• A minimum of 2 initiatives</li> </ul>	Exceeds level 2 by citing a clear connection to the specific school/community need
<b>Communication</b>		
<b>1 – Does not meet</b>	<b>2 – Meets</b>	<b>3 - Exceeds</b>
Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to communication</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• Less than 2 initiatives</li> </ul>	Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to communication</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• A minimum of 2 initiatives</li> </ul>	Exceeds level 2 by citing a clear connection to the specific school/community need
<b>Funding</b>		
<b>1 – Does not meet</b>	<b>2 – Meets</b>	<b>3 - Exceeds</b>
Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to funding</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• Less than 2 initiatives</li> </ul>	Includes all of the following: <ul style="list-style-type: none"> <li>• Measurable initiative aligned to funding</li> <li>• Clear timeline established</li> <li>• Resources included</li> <li>• Roles assigned</li> <li>• A minimum of 2 initiatives</li> </ul>	Exceeds level 2 by citing a clear connection to the specific school/community need
<b>Board Approval and Signatures</b>		
<b>1 – Does not meet</b>	<b>2 – Meets</b>	<b>3 - Exceeds</b>
Missing any component of level 2	Dated and signed by school board chair and school leader.	

# Coversheet

## Updated 2021-22 Policies/Procedures/Handbooks

**Section:** V. Action Items  
**Item:** B. Updated 2021-22 Policies/Procedures/Handbooks  
**Purpose:** Vote  
**Submitted by:**  
**Related Material:**  
2110P (TBIP) Transitional Bilingual Instruction Program Procedure.pdf  
2162-Section 504 Policy.pdf  
2110 (TBIP) Transitional Bilingual Instruction Program.pdf  
2190P Highly Capable Programs Procedure.pdf  
2162P-Section 504 Procedure.pdf  
2190 Highly Capable Program.pdf  
2161- Special Education and Related Services.docx  
4040 - Public Access to District Records.docx  
2161P - Special Education and Related Services Procedure updated 8-2022.docx  
4040P - Public Access to District Records Procedure.docx



**Procedure for POLICY #2110**  
**Transitional Bilingual Instruction Program**

**Adopted** – 06/2021

**Last Revised** – PCM: 06/2021, WSSDA: 12/2015

**Prior Revised Dates** – WSSDA: 6/1997, 6/2011, 4/2015

The following procedures are instituted for purposes of implementing an alternative instruction program, namely Content-Based (Sheltered) Instruction (CBI).

A Transitional Bilingual Instruction Program, as defined by state law, means a system of instruction which uses two languages, one of which is English, to build upon and expand language skills to enable the student to achieve competency in English. In those cases where the use of two languages is not practicable, appropriate instruction for English learners may be provided primarily in English.

The Pullman Community Montessori (PCM) school will provide English learners appropriate core academic instruction in addition to language instruction. The school's Transitional Bilingual Instruction Program is intended to supplement core academic instruction.

**Program Application and Description**

Annually, and prior to August 1 of each year, the school will submit an application to the Office of Superintendent of Public Instruction requesting funding to support its Transitional Bilingual Instruction Program. In its application, the school will provide a description of its research-based program models including staffing and implementation strategies.

**Eligibility**

At the time of registration, the parents/guardians of each student will be asked to complete a home language survey which identifies the child's primary language. Students that indicate on the home language survey a primary language other than English will be assessed within ten (10) school days of enrollment and attendance using the state-approved language proficiency test to determine eligibility for the Transitional Bilingual Instruction Program. Any student who scores at an "emerging" or "progressing" level will be eligible for the program. Students who score at a "proficient" level are not eligible for the program. Staff will determine the appropriate instructional program for each eligible student.

If a transfer student has previously been identified as an English learner in Washington and has not yet scored at a "proficient" level, the student will be served in the receiving school's Transitional Bilingual Instruction Program based on the last score the student received in the sending district.



#### 41 **Parent/Guardian Notification**

42 Parents/guardians will be notified, in writing, of their child's initial eligibility and notified annually of  
 43 their child's continuing eligibility for the Transitional Bilingual Instruction Program. At a minimum the  
 44 parent/guardian notification will contain:

- 45
- 46 1. How the child's eligibility was determined and the child's current level of English proficiency;
- 47 2. A description of the school's program and how it will meet the child's educational needs;
- 48 3. The method of instruction used in the program in which their child is, or will be, participating,
- 49 and the methods of instruction used in other available programs, including how such programs
- 50 differ in content, instruction goals, and use of English and a native language instruction;
- 51 4. How the program in which their child is, or will be participating, will meet the educational
- 52 strengths and needs of their child;
- 53 5. How the program will specifically help their child learn English, and meet age-appropriate
- 54 academic achievement standards for grade promotion and graduation;
- 55 6. The specific exit requirements for the program, the expected rate of transition from such
- 56 program into classrooms that are not tailored for English learners, and the expected rate of
- 57 graduation from secondary school for such program if funds under this title are used for
- 58 children in secondary schools; and
- 59 7. Information on the parent's right to decline to enroll their child in such program or to choose
- 60 another program or method of instruction, if available; and assisting parents in selecting among
- 61 various programs and methods of instruction, if more than one program or method is offered
- 62 by the eligible entity.

63

64 Communication with parents/guardians will be provided, when feasible, in the parents' primary  
 65 language.

66

#### 67 **Continued Eligibility/Annual Assessment**

68 Each eligible English language learner, including English learners under a parent waiver, must be  
 69 assessed annually, using the state-approved language proficiency test to determine continued  
 70 eligibility. Students remain eligible until they score at a "proficient" level on the annual state-approved  
 71 language proficiency test. After students have exited an EL program, school districts must monitor the  
 72 academic progress of former English learners for at least two years to ensure that: the students have not  
 73 been prematurely exited; any academic deficits they incurred as a result of participation in the ELL  
 74 program have been remedied; and that the students are meaningfully participating in the standard  
 75 instructional program comparable to their never-EL peers.

76

#### 77 **Expected Graduation Year**

78 For students, including eligible English learners, who require extended time to meet high school  
 79 graduation requirements, the school may set an expected graduation year beyond the typical four years  
 80 of high school or through the school year in which a student turns 21. For an EL program to be  
 81 reasonably calculated to ensure that EL students attain equal participation in the standard instructional  
 82 program within a reasonable length of time, if an EL student enters the ninth grade with beginner-level



English proficiency, the school district should offer EL services that would enable the student to earn a regular high-school diploma in four years.

### **Record Keeping and Documentation**

The school will maintain records of eligible students and comply with state reporting requirements. Original documents will be kept in the student's cumulative folder and copies will be kept in the program folder, if applicable. These documents include the home language survey, parent notification letters, parental waiver (if applicable), and language proficiency test assessment data.

### **Communication Plan**

The school will develop and provide to parents/guardians, school staff and interested stakeholders a user friendly description of the Transitional Bilingual Instruction Program offered in the school in the stakeholder's home/primary language. The description will include the process for identifying and serving English learners and provide contact information for the school's transitional bilingual instruction program manager.

### **Professional Development**

Provide in-service training for teachers, counselors, and other staff, who are involved in the school's transitional bilingual program. Such training shall include appropriate instructional strategies for children of culturally different backgrounds, use of curriculum materials, and program models.

### **Report to the Board**

Annually, and prior to the board of directors' program approval, the Head of School or designee will report on the status of the school's Transitional Bilingual Instruction Program.

### **Legal References:**

[RCW 28A.180 Transitional Bilingual Instructional Program](#)

[WAC 392-160 Transitional Bilingual Instruction Program](#)

**Cross References:** NA



**POLICY #2162****Education of Students with Disabilities Under Section 504 of the Rehabilitation Act of 1973****Adopted** – 6/2021**Last Revised** – PCM: 6/2021, WSSDA: 11/2016**Prior Revised Dates** – WSSDA: 6/2011, 6/2014

It is the intent of the Pullman Community Montessori (PCM) school to ensure that students who are disabled within the definition of Section 504 of the Rehabilitation Act of 1973 (Section 504) are identified, evaluated and provided with appropriate educational services. Students may be a qualified disabled person under this law even though they are not eligible for services pursuant to the Individuals with Disabilities Education Act.

Section 504 is a civil rights law which protects the rights of individuals with disabilities in programs and activities that receive federal financial assistance from the U.S. Department of Education. A child is a "qualified disabled person" under Section 504 if the child:

- A. Has a physical or mental impairment that substantially limits one or more major life activities (such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, reading, concentrating, thinking, communicating and working), has a record of such an impairment, or is regarded as having such an impairment; and
- B. Is between the ages of 3 to 21 years old.

The Head of School or designee will establish procedures to ensure that students who are disabled within the definition of Section 504 are educated in full compliance with the law.

**Legal References:**[42 USC 12101 et seq. Americans With Disabilities Act of 1990](#)[34 CFR Part 104 Section 504 of the Rehabilitation Act of 1973](#)[34 CFR Part 99 Family Educational Rights and Privacy Act](#)[RCW 28A.600.485 Restraint of students—Use of restraint or isolation specified in individualized education programs or plans developed under section 504 of the rehabilitation act of 1973—](#)[Procedures—Summary of incidents of isolation or restraint—Publishing to web site](#)[RCW 28A.600.486 District policy on the use of isolation and restraint — Notice to parents and guardians of children who have individualized education programs or plans developed under section 504 of the rehabilitation act of 1973](#)**Cross References:**[2161 - Special Education and Related Services for Eligible Students](#)[3210 - Nondiscrimination](#)[3246 - Restraint, Isolation and Other Uses of Reasonable Force](#)


**POLICY #2110**
**Transitional Bilingual Instruction Program**

**Adopted** – 06/2021

**Last Revised** – PCM: 06/2021, WSSDA: 12/2011

**Prior Revised Dates** – WSSDA: 4/2009

The Pullman Community Montessori (PCM) school Board of Trustees is highly committed to ensuring an equal educational opportunity for every student. WAC 392-160-010 requires that districts “shall make available to each eligible student a transitional bilingual instruction program, or if the use of two languages is not practicable as provided in WAC 392-160-040, an alternative instructional program.” The most appropriate alternative instruction program for PCM to implement is the Content-Based (Sheltered) Instruction (CBI) as it is used in classes comprised predominantly of multilingual/English learners.

The CBI model pairs English language development with academic grade-level content using English as the language of instruction. Explicit English language development instruction and rigorous, grade-level academic content is delivered by teachers specifically trained in the field of second language acquisition and instructional strategies for language learners. CBI classes can be designed to meet core content credit requirements and/or to serve as language development support classes. As with all other TBIP allowable programs, designated English language development instruction is a civil rights obligation and a required program component.

The school’s transitional bilingual instruction program is designed to enable students to achieve competency in English. Annually, the board of trustees will approve the school’s transitional bilingual instruction program.

The school and its staff will:

- A. Communicate, whenever feasible, with parents of English language learners in a language they can understand;
- B. Assess and determine, by means of a state approved placement test, student eligibility within 10 days of enrollment and attendance;
- C. Annually assess, by means of the state approved test, improvement in English language proficiency for each eligible English language learner;
- D. Provide professional development training for administrators, teachers, counselors and other staff on the school’s bilingual instruction program, appropriate use of instructional strategies



# PULLMAN PUBLIC COMMUNITY FREE MONTESSORI K-9

and assessment results, and curriculum and instructional materials for use with culturally and linguistically diverse students; and

- E. Provide for continuous improvement and evaluation of the school's program to determine its effectiveness.

For purposes of providing such services, the Head of School and Montessori Coach will establish procedures for implementing the school's Transitional Bilingual Instruction Program.

## **Legal References:**

[Chapter 28A.180 RCW Transitional bilingual instruction program](#)

[WAC 162-28-040 English language limitations and national origin discrimination](#)

[Chapter 392-160 WAC Special service program - Transitional bilingual](#)

**Cross References:** NA



**Procedure for POLICY #2190P**  
**Highly Capable Programs**

**Adopted** – 06/2021

**Last Revised** – PCM: 06/2021, WSSDA: 08/2018

**Prior Revised Dates** – WSSDA: 04/2008, 12/2011, 09/2013, 06/2014

**Definition**

Highly capable students are students who perform or show potential for performing at significantly advanced academic levels when compared with others of their age, experiences, or environments.

Highly capable students exhibit outstanding abilities within their general intellectual aptitudes, specific academic abilities, and/or creative productivities within a specific domain. These students are present both in the general populace and within all protected classes.

Students who are highly capable may possess, but are not limited to, these learning characteristics:

1. Capacity to learn with unusual depth of understanding, to retain what has been learned, and to transfer learning to new situations;
2. Capacity and willingness to deal with increasing levels of abstraction and complexity earlier than other peers;
3. Creative ability to make unusual connections among ideas and concepts;
4. Ability to learn quickly in their area(s) of intellectual strength; and
5. Capacity for intense concentration and/or focus.

The Pullman Community Montessori (PCM) school will employ the following procedures to refer, assess, and select students to participate in the program:

**Referral**

PCM accepts referrals based on data or evidence from teachers, other staff, parents, students, and members of the community. Persons referring a student for consideration for admission into the program will use PCM referral form.

Examples of data include, but are not limited to:

- MEFS (Minnesota Executive Functioning Scale), a nonverbal measure
- MAP Growth testing
- Rubric based assessments of student created projects
- Ratings and advancement in lessons via Transparent Classroom record keeping system
- Student Portfolios of Work
- End of Unit examinations including SBAC



## 41 **Assessment**

42 The school will obtain written or electronic parental permission prior to conducting assessments to  
 43 determine eligibility for participation in its Highly Capable (HiCap) Program.

44  
 45 School practices for identifying the most highly capable students prioritize equitable identification of  
 46 low-income students.

47  
 48 PCM will assess students identified using multiple objective criteria. PCM will base the assessment  
 49 process upon a review of each referred student's capability as shown by multiple criteria, from a wide  
 50 variety of sources and data, intended to reveal each referred student's unique needs and capabilities.

51  
 52 The assessment criterion consists of both qualitative and quantitative instruments and may include:

- 53 • *Teacher input and recommendation*
- 54 • *Minimum of five work samples in the relevant content area*
- 55 • *MEFS (Minnesota Executive Functioning Scale) measures*
- 56 • *MAP Growth testing results*
- 57 • *Rubric based assessments of Student created projects*
- 58 • *Ratings and advancement in lessons in the relevant content area via Transparent Classroom*
- 59 *Record Keeping System*
- 60 • *Student Portfolios of Work*

61  
 62 The following criteria will be followed when creating PCM's HiCap Plan identification protocols and  
 63 processes:

- 64
- 65 a) Schools must use multiple objective criteria to identify students who are among the most highly
- 66 capable. Multiple pathways for qualifications must be available and no single criterion may
- 67 disqualify a student from identification;
- 68 b) The school must base highly capable selection decisions on consideration of criteria
- 69 benchmarked on local norms, but the school will not use local norms as a more restrictive
- 70 criterion than national norms at the same percentile.
- 71 c) The school will not use subjective measures, such as teacher recommendations or report card
- 72 grades to screen out a student from assessment or to disqualify a student from identification.
- 73 However, the school may use these data points alongside other criteria during selection to
- 74 support identification; and
- 75 d) To the extent practicable, the school must give screening and assessments in the native
- 76 language of the student. If native language screening and assessments are not available, the
- 77 school must use a nonverbal screening and assessment.
- 78 e) The school will record test results in the student's cumulative file.

## 80 **Selection**

81 A multi-disciplinary Selection Committee will be composed of the Head of School and the Director of  
 82 Academic Programs, the SPED teacher and additional professionals which PCM deems appropriate, as



well as the teachers within and above the grade level. The Selection Committee will review data that has been collected for each of the referred students.

The Selection Committee will evaluate individual student assessment profile data and make the selection decision based on:

1. A preponderance of evidence from the profile data demonstrating that a student is among the most highly capable;
2. Evidence of clear need for highly capable services; and
3. Determination of which students would benefit the most from inclusion in the school's program.

A single assessment score or indicator will not prevent a student's selection for the HiCap Program; however, individual pieces of evidence, if strong enough, can indicate that the student would benefit from these services. If properly validated test are not available, the professional judgment of the qualified school personnel shall determine eligibility of the student based upon evidence of cognitive and/or academic achievement.

The school will:

1. Notify parents of the students selected. Parents will receive a full explanation of the procedures for identification, an explanation of the process to exit a student from the program, the information on the school's program, and the options that are available to identified students.
2. Obtain parental permission to place identified students in the program before any special services and programs are provided to the student.

### **Process for Appeal**

Parents/legal guardians have the right to appeal the Selection Committee's decision. Individuals appealing the selection committee's decision must submit a completed appeal form or letter requesting review of selection/placement decision. The written request must include reasons for the appeal and, to support reconsideration, provide additional evidence of significantly advanced cognitive or academic levels and/or outstanding intellectual, academic, or creative abilities.

Parents/legal guardians must submit the appeal request and supporting evidence to the Head of School or Designee electronically or in hard copy form. [Lsullivan@myPCM.org](mailto:Lsullivan@myPCM.org) or Pullman Community Montessori, 115 NW State Street STE 212, Pullman WA 99163. Submittals must be shared within ten (10) school days of the Selection Committee's decision notification.

PCM's Selection Committee will review the student's file, assessment profile data, and additional evidence provided in the request for appeal.

The decision of the Selection Committee may include:

- Upholding the original decision of the Selection Committee;





- Reversing the original decision of the Selection Committee;

The Selection Committee will make a decision within ten (10) school days after receipt of written request for reconsideration and will notify the parent/legal guardian of the decision in writing. The decision of the Appeals Committee is the final decision.

### **Exit Process**

Upon the request of a teacher or a highly capable program administrator, PCM may initiate the exit process for students who no longer demonstrate a need for HiCap program services. The Selection Committee will convene a meeting to review the student's profile to determine if the student qualifies for program services based on assessment data and selection criteria. The Selection Committee may request additional evidence of student capabilities and/or willingness to participate in the program. If the Selection Committee determines that the student no longer qualifies for highly capable program services, it may recommend that the student be exited from the program. PCM will notify the parent in writing of the committee's decision and of the appeal's process.

A parent/legal guardian may request to withdraw the student from the program or a student may voluntarily withdraw from the program. A meeting will be convened by the HiCap Program Coordinator to discuss the request. If the parent/legal guardian desires to withdraw the student from the program, PCM will exit the student from the program. The Selection Committee will determine if identification procedures are necessary for students wishing to reenter the program in the future.

### **Program Design**

PCM will make a variety of appropriate program services available to students who participate in the program. Once services are started, PCM will provide a continuum of services to identified students in grades K-9. PCM will keep on file a description of the educational programs provided for identified students. PCM reviews services semi-weekly for each student to ensure that the services are appropriate.

PCM will offer highly capable students the following programs may include one or more of the following:

- Weekly Targeted Planning and Learning Time in which enhanced lessons and learning experiences are implemented to meet student's needs, including incorporating the NAGC Gifted Program Standards
- Accelerated learning opportunities in higher grade bands when available
- Academic grouping arrangements that provide intellectual peer and interest group interaction

### **Reporting**

Identified students will be assigned the appropriate CEDARS Gifted value(s) in the school's student information system for the end-of-year reporting activities.



166 The Head of School or designee will provide an end-of-the-year report to the Office of Superintendent  
167 of Public Instruction (OSPI) that includes

- 168 • Number of students served by grade level K-12
- 169 • Student demographic information
- 170 • Data to determine if students who are highly capable met the goals set and if the programs
- 171 provided met the academic needs of these students;
- 172 • Number and content of professional development activities provided for special teachers and
- 173 general education staff; and
- 174 • Program evaluation data and, if needed, program changes that will be made based upon this
- 175 information.

176

177 Each June, the Administrative Team and Lead Teachers will evaluate the data of students in the Highly  
178 Capable Program to ensure that each student is making growth. Data that the team will consider  
179 includes, but is not limited to:

- 180 • SBAC results
- 181 • MAP Growth results
- 182 • Student work samples
- 183 • MEFS Growth results

184

185

186 **Legal References:** NA

187

188 **Cross References:** NA





**PROCEDURE for POLICY #2162**

**Education of Students with Disabilities Under Section 504 of the Rehabilitation Act of 1973**

**Adopted** – 6/2021

**Last Revised** – PCM: 6/2021, WSSDA: 11/2016

**Prior Revised Dates** – WSSDA: 6/1997, 6/2011, 4/15

**A. Free Appropriate Public Education**

Pullman Community Montessori (PCM) will provide a free appropriate public education to school-age children with disabilities in PCM's jurisdiction.

**B. Child Find**

PCM will annually undertake to identify and locate every qualified disabled student residing in PCM's jurisdiction who is not receiving a public education and take appropriate steps to notify disabled children and their parents or guardians of PCM's responsibilities under Section 504.

**C. Equal Educational Opportunity**

PCM will provide students with disabilities an equal opportunity to participate in and benefit from the educational services it provides to non-disabled students. The teachers of disabled students will meet comparable standards for certification that teachers of non-disabled students meet. Facilities will be of comparable quality and appropriate materials and equipment will be available.

**D. Confidentiality of Information**

The confidentiality of student records will be maintained throughout the period of time when such records are collected, stored, disclosed or destroyed by PCM.

**E. Parent Involvement**

1. **Initial Evaluation.** PCM will obtain the consent of parents or guardians before conducting an initial evaluation of a student. PCM will notify parents or guardians of the evaluation results.
2. **Initial Placement.** PCM will notify parents or guardians before initially placing a disabled student.
3. **Significant Change in Placement.** PCM will notify parents or guardians before implementing a significant change in the student's placement.



4. **Right to Challenge.** PCM will notify parents or guardians of their right to review and challenge PCM's program and placement decisions if they disagree with them.
5. **Meetings.** Section 504 does not give parents or guardians the right to participate in a meeting during which their child's program is designed and placement is determined, as does the IDEA. However, this practice is recommended.

#### **F. Participation in the Least Restrictive Environment**

1. **Academic setting.** To the maximum extent appropriate, PCM will educate disabled students with non-disabled students. In order to remove a child from the regular educational environment, PCM must demonstrate that education of the student in the regular environment with the use of supplementary aids and services cannot be achieved satisfactorily for the disabled student. Whenever PCM places a student in a setting other than the regular education environment, it will take into account the proximity of the alternate setting to the student's home.
2. **Non-academic setting.** In providing or arranging for the provision of non-academic and extra-curricular services and activities, including meals, recess periods, and the services and activities, PCM will ensure that disabled students participate with non-disabled students in such activities and services to the maximum extent appropriate.

#### **G. Referral and Screening**

1. **Referral.** If a student, parent or guardian, teacher, counselor or administrator believe they are observing in a student substantially limited performance in one or more major life activities that is believed to be caused by a physical or mental impairment, the concerned individual should complete a referral form which should be submitted to the 504 Coordinator ([EmilyK@myPCM.org](mailto:EmilyK@myPCM.org)).
2. **Screening.** A designated building team will review referrals to determine if an evaluation is appropriate. If an evaluation appears to be necessary, PCM will obtain written consent from parents or guardians to perform an evaluation and/or gather additional information and will provide parents with a written statement of their rights under Section 504. If the 504 Team determines that an evaluation is not necessary, it will provide written notice to parents/guardians, and forward the results of the screening to the source of the referral.

#### **H. Evaluations**

1. **Significant Change in Placement.** If a student is believed to be disabled and needs, or is believed to need, special education or related services, PCM will evaluate the student prior to placement and before any subsequent "significant change in that placement." An evaluation



need not include formal or written assessments but may involve, in appropriate circumstances, a review and consideration of existing information.

Examples of significant changes in placement include:

- a. Expulsion;
- b. Suspensions which exceed ten consecutive days in a school year;
- c. Cumulative short-term suspensions which create a pattern of exclusion;
- d. Transferring a student to home instruction; and/or
- e. Graduation from high school.

2. **Tests and Evaluation Materials.** PCM will establish procedures for evaluation and placement which assure that tests and other evaluation materials:

- a. Have been validated and are administered by trained personnel;
- b. Are tailored to assess educational need and are not merely based on IQ scores; and
- c. Reflect aptitude or achievement or whatever else the tests purport to measure and do not reflect the student's impaired sensory, manual or speaking skills (unless the test is designed to measure these particular deficits).

3. **Mitigating Measures.** The determination of whether a student is substantially limited in one or more major life activities will be made without regard to any ameliorative effects of mitigating measures which include, but are not limited to: medication, medical supplies, equipment, low-vision devices, prosthetics, hearing aids and cochlear implants or other implantable hearing devices, mobility devices, oxygen therapy equipment and supplies, assistive technology, reasonable accommodations, auxiliary aids or services; or learned behavioral or adaptive neurological modifications. However, ameliorative effects of mitigating measures may be relevant as to whether a student needs any specific accommodation or a 504 accommodation plan.

**Low vision devices do not include ordinary eyeglasses or contact lenses.** The ameliorative effects of ordinary eyeglasses or contact lenses may be considered in determining whether the impairment substantially limits a major life activity.

4. **Temporary Impairments.** A student with a temporary impairment falls within the scope of Section 504 if the temporary impairment is severe enough that it substantially limits one or more of the student's major life activities. A temporary impairment is one with an actual or expected duration of six months or less. For example, pregnancy is not generally regarded as



a disability under Section 504; however, if a student was put on bed rest or otherwise limited due to pregnancy complications, this would be a temporary impairment that would qualify the student as disabled under Section 504.

A student with an episodic impairment or a disease in remission qualifies as disabled under Section 504 if the impairment would substantially limit a major life activity when active (e.g. a student whose cancer is in remission).

#### **I. Placement Procedures**

The Section 504 team will convene to review all evaluation results, determine eligibility as a student with a disability under Section 504 and document the meeting in writing. The team composition may vary according to the needs of the student.

In interpreting evaluation data and in making placement decisions, PCM will

- a. draw upon information from a variety of sources, including aptitude and achievement tests, teacher recommendations, physical condition, social or cultural background and adaptive behavior;
- b. establish procedures to ensure that information obtained from all such sources is documented and carefully considered;
- c. ensure that the placement decision is made by a group of persons, including persons knowledgeable about the student, the meaning of the evaluation data, and the placements options; and
- d. ensure that the student is educated with his/her non-disabled peers to the maximum extent appropriate.

Parents and guardians of students who have a plan developed under Section 504 will be provided a copy of PCM policy (see Policy 3246) on the use of isolation and restraint at the time that the plan is created.

If PCM affords a free appropriate education to a student but the parent chooses to place the child elsewhere, PCM is not responsible to pay for the out-of-district placement.

#### **J. Reevaluations**

PCM will provide for periodic reevaluation of disabled students. No time frame is specified in Section 504; however, re-evaluating students every three years in accordance with the requirements of the IDEA



will satisfy Section 504 requirements as well. A reevaluation is also required before any "significant change of placement," as defined above in Part "H."

#### **K. Programming to Meet Individual Needs**

PCM recognizes that to be appropriate, educational programs for students with disabilities must be designed to meet their individual needs to the same extent that the needs of non-disabled students are met. A documented procedure, such as the development of an individualized accommodation plan by a knowledgeable team of educational professionals, may be appropriate.

#### **L. Non-Academic Services**

PCM will provide nonacademic and extracurricular services and activities in such a manner as is necessary to afford disabled students an equal opportunity for participation in such services and activities. Nonacademic and extracurricular services and activities may include counseling services, physical recreation athletics, transportation, health services, recreational activities, interest groups or clubs sponsored by PCM, referrals to agencies which provide assistance to disabled persons and employment of students, including both employment by PCM and assistance in making available outside employment. PCM will observe reasonable health and safety standards for all students.

1. **Counseling Services.** In providing personal, academic or vocational counseling, guidance or placement services to its students, PCM will provide these services without discrimination on the basis of disability. PCM will ensure that qualified students with disabilities are not counseled toward more restrictive career objectives than are non-disabled students with similar interests and abilities.
2. **Physical Education and Athletics.** In providing physical education courses and athletics and similar programs and activities to any of its students, PCM will not discriminate on the basis of disability. If PCM offers physical education courses and operates or supports interscholastic, club or intramural athletics, it will provide an equal opportunity for qualified students with disabilities to participate in these activities consistent with their abilities and needs.

#### **M. Disciplinary Exclusion**

1. **Exclusions.** Students with disabilities are protected from being improperly excluded from school for disciplinary reasons. Certain disciplinary exclusions of disabled students from school constitute a significant change in the student's educational placement. A disciplinary change in the student's educational placement occurs if the student has been suspended for more than ten consecutive days or if the disciplinary exclusions constitute a "pattern of exclusion" (defined below). Such disciplinary exclusions, which are change of placement,



cannot be implemented unless PCM first determines that the student's misconduct which led to the disciplinary exclusion was not a manifestation of the student's disability.

2. **Manifestation Determinations.** If a disciplinary exclusion (suspension or expulsion) which constitutes a change in placement is implemented, the school principal or educational staff person responsible for the imposition of discipline must ensure that a group of qualified professionals (the student's Section 504 team) determine whether or not the misconduct is a manifestation of the student's disability.

The misconduct is considered a manifestation of the disability if the conduct was caused by, or had a direct and substantial relationship to the student's disability. This manifestation determination will take into account the student's current evaluation and individualized accommodation plan under Section 504.

Under Section 504, there is no obligation to provide educational services during periods of long-term suspension or expulsion when the student's misconduct has been properly determined not to be disability-related. However, Washington state law requires PCM to provide educational services to all students during a period of suspension or expulsion (See Policy/Procedure 3241).

If a student's misconduct is determined to be a manifestation of his/her disability, procedures in #3 below will be instituted in lieu of either long-term suspension or expulsion.

3. **Conduct That Is a Manifestation of a Disability.** When a student has engaged in misconduct which is a manifestation of to his or her disability, expulsion and/or long-term suspension should not be imposed if it would result in a change in educational placement (a disciplinary exclusion from school of over ten consecutive days or exclusions which constitutes a pattern of exclusion). Days will be measured cumulatively over the period of the entire school year, with any short-term suspensions as counting toward the cumulative total.

When a student's misconduct is related to a disability, additional evaluations and/or a change of placement should be considered. In this circumstance, the Section 504 team will meet to determine if there is a need for further evaluation or a change of program. If further evaluation is recommended, it will be conducted as soon as reasonably possible.





- 215 4. **Pattern of Exclusion.** Suspension or emergency expulsion of a disabled student may occur,  
216 without the need to determine if there is a causal connection with the disability, if the  
217 suspension or emergency expulsion is ten consecutive days or less, or if more than ten  
218 cumulative days is not a pattern of exclusion. A pattern of exclusion occurs if:  
219 a. The removal is for more than ten school days in a year; and  
220 b. The student's behavior is substantially similar to the behavior that he/she was previously  
221 removed for.

222  
223 Additional factors to consider are the length of each removal (the total amount of time the  
224 student has been removed, and the proximity of the removals to one another), and the  
225 school must determine on a case-by-case basis whether a pattern of removals is significant  
226 enough to constitute a change in placement.

- 227  
228 5. **Right to Challenge.** Students and their parent/guardian will be notified of the results of the  
229 manifestation decision and of their right under the law to challenge this decision.  
230  
231 6. **Drugs or Alcohol.** Students who are considered disabled under Section 504 are subject to  
232 the same disciplinary processes and results as non-disabled students for misconduct  
233 regarding the use, sale or possession of drugs or alcohol at school.  
234  
235 7. **Restraint or Isolation.** Restraint or isolation of students who have a Section 504 plan will be  
236 authorized only under the limited circumstances specified in Policy/Procedure 3247 and  
237 each incident will require reporting and parent/guardian notification as specified in that  
238 policy and procedure.

239  
240 **P. Transportation**

241 If PCM places a student in a program not operated by PCM, PCM will assure that adequate  
242 transportation to and from the program is provided at no cost to the parent.

243  
244 Because PCM provides transportation to all its students within a certain geographic area, it will not  
245 discriminate in its provision of transportation to students with disabilities.

246  
247 If PCM proposes to terminate a qualified disabled student's bus transportation for inappropriate bus  
248 behavior, PCM will first determine the relationship between the student's behavior and his or her  
249 disabling condition. The parent or guardian will be provided with notice of the results of such  
250 determinations and of their right to challenge such determinations.

**Q. Procedural Requirements**

PCM will ensure compliance with the requirements of Section 504 by doing the following:

1. **Assurance.** Provide written assurance of non-discrimination whenever PCM receives federal money;
2. **Designation of Employee.** Designate an employee to coordinate PCM's Section 504 compliance activities. The Section 504 Coordinator for PCM is Emily Klein ([EmilyK@myPCM.org](mailto:EmilyK@myPCM.org));
3. **Grievance Procedures.** Provide grievance procedures to resolve complaints of discrimination. Students, parents or employees are entitled to file grievances. The grievance procedures for PCM are set out in the Procedure for Policy 3210, Nondiscrimination;
4. **Notice.** Provide notice to students, parents/guardians, employees, unions and professional organizations of PCM's nondiscrimination policy in admission and access to programs and activities, and in treatment and employment. Notice will also specify the Section 504 coordinator for PCM;
5. **Locate.** Annually undertake to identify and locate all Section 504 qualified disabled children in PCM's jurisdiction who are not receiving a public education;
6. **Annual Notification.** Annually take appropriate steps to notify disabled persons and their parents/guardians of PCM's responsibilities under Section 504; and
7. **Procedural Safeguards.** Establish and implement procedural safeguards to be provided to parents/guardians with respect to actions regarding the identification, evaluation or educational placement of persons who, because of disability, need, or are believed to need, special instruction or related services. Procedural safeguards will include:
  - a. Notice of parental/guardian rights;
  - b. An opportunity for parents/guardians to examine relevant records;
  - c. An impartial hearing, initiated by either the parents/guardian or PCM, with opportunity for participation by the student's parents/guardians and representation by legal counsel; and
  - d. A review procedure.

**R. Appropriate Funding**

PCM recognizes that the regular education funding of PCM is the funding source for serving students who are qualified as disabled under Section 504 only. However, if students are dual identified as Section 504 and IDEA eligible, state and federal special education funds can be used. PCM will not use money appropriated by the IDEA to serve students found disabled under Section 504 but not the IDEA. PCM





may use the IDEA money to evaluate a student if PCM believes that the student may also be eligible under the IDEA.

#### **S. Accessibility**

1. Facilities that were constructed prior to June 3, 1977 need not necessarily be made accessible so long as the program or activity, viewed in its entirety, is readily accessible to persons with disabilities.
2. Facility alterations commenced after June 3, 1977, that affect or could affect the facility's usability must be accomplished so that, to the maximum extent feasible, the altered portion of the facility is readily accessible and usable by persons with disabilities.
3. A district can redesign equipment, reassign classes or other services to accessible buildings, assign aides to students, deliver services at alternate accessible sites or alter existing facilities. So long as there are other methods which are as effective in achieving compliance, a district need not undertake structural changes to a building.
4. District recognition of the meaning of the phrase "to the maximum extent feasible." This provision covers the instance where occasionally the nature of an existing facility is such as to make it impractical or prohibitively expensive to renovate in a manner that results in it being entirely barrier-free. However, in all of these instances, the alteration should provide the maximum amount of physical accessibility feasible.

#### **T. Special Considerations for ADD/ADHD Students**

Section 504 obligations apply to all students with disabilities, including students with attention deficit disorder (ADD) or attention-deficit/hyperactivity disorder (ADHD). Under federal guidance, there are three different types of ADHD, which are categorized depending upon which symptoms are the strongest:

- (1) predominately inattentive type;
- (2) predominately hyperactive-impulsive type; and
- (3) combined type (where symptoms of the first two types are equally present).

See U.S. Department of Education, Office for Civil Rights, Students with ADHD and Section 504: A Resource Guide (July 2016) (available on the Office for Civil Rights' website at <http://www2.ed.gov/about/offices/list/ocr/frontpage/faq/rr/policyguidance/disability.html>).



322 **U. Due Process Hearing or Mediation Requests**

323 Due process hearing or mediation requests must be made directly to PCM 504 Compliance Officer.

324

325 **Legal References:** NA

326

327 **Cross References:** NA



# PULLMAN PUBLIC COMMUNITY FREE MONTESSORI K-9

## **POLICY #2190 Highly Capable Programs**

**Adopted** – 06/2021

**Last Revised** – PCM: 06/2021, WSSDA: 8/2018

**Prior Revised Dates** – WSSDA: 4/2008, 12/2011, 9/2013

In order to develop the special abilities of each student, the Pullman Community Montessori (PCM) school will offer a highly capable program that provides kindergarten through ninth grade students who are selected for the program, with access to basic education programs that accelerate learning and enhance instruction. The framework for such programs will encompass, but not be limited to, the following objectives:

1. Expansion of academic attainments and intellectual skills;
2. Stimulation of intellectual curiosity, independence, and responsibility;
3. Development of a positive attitude toward self and others; and
4. Development of originality and creativity.

The board will annually approve the school's highly capable plan including: the number of students the school expects to serve by grade level; the school's plan to identify students; a description of the highly capable program goals; a description of the services the program will offer; an instructional program description; a description of ongoing professional development for highly capable program and general education staff; program evaluation and fiscal report; and assurances that the school is legally compliant.

The Head of School and Montessori Coach will establish procedures consistent with state guidelines for referral, assessment, and selection of children of demonstrated achievement or potential ability in terms of general intellectual ability, academic aptitude, and creative or productive thinking. These include prioritizing equitable identification of low-income students; use of multiple objective criteria and multiple pathways for identification; use of local norms, unless more restrictive than national norms; use of subjective measures only to support identification; and use of screening and assessment in the student's native language (if available) or nonverbal assessment.

### **Legal References:**

[RCW 28A.185.030 Programs — Authority of local school districts — Selection of students](#)

[WAC 392-170 Special service program — Highly capable students](#)

**Cross References:** NA

**POLICY #2161****Special Education and Related Services for Eligible Students****Adopted** – 5/2021**Last Revised** – PCM: x/2022, WSSDA: 12/2021**Prior Revised Dates** – WSSDA: 10/2000, 10/2002, 12/2007, 10/2009, 12/2011, 06/2014, 3/2016 PCM 5/2021

The Pullman Community Montessori (PCM) school board recognizes that students whose disabilities adversely impact educational performance and who require specially designed instruction can improve their educational performance when they receive special education and related services tailored to fit their needs. PCM adopts the state's full educational opportunity goal to provide students in need of special education services with a free appropriate public education.

Special education programs for eligible students will be an integral part of the general educational programs of PCM and will be operated in compliance with federal and state requirements governing special education. PCM will provide a continuum of placement options, which may include services within and outside PCM depending on the student's needs.

Not all students with disabilities are eligible for special education services. The needs of students with disabilities will be addressed individually and, if appropriate, students will be provided accommodations, modifications, and/or related aids and services as required under Section 504 of the Rehabilitation Act of 1973 in accordance with PCM policy and procedures.

**Mediation or Resolution Agreements**

The board authorizes the Head of School or a designee to bind PCM to a mediation or resolution agreement.

**Commencement Exercises/Certificate of Attendance**

In order to participate in commencement exercises, students must have met the minimum criteria for graduation prior to the date of the exercise and otherwise be in good standing with their school through the commencement date. Minimum criteria for participation may be adjusted for students with an Individualized Education Program (IEP) whose disabilities have impacted their opportunity to accumulate credits. In limited circumstances, when determined necessary by the individualized education program team due to the unique needs resulting from the student's disability, a graduation credit and subject area requirement may be substituted with comparable content course work, as identified in the individualized education program team course of study and aligned to the student's high school and beyond plan. Each student's IEP team will determine the student's graduation plan, including graduation date. Students with an IEP who have attended four years of high school and need additional time to complete IEP goals and/or credits may request participation in commencement



exercises. Students with an IEP will receive a certificate of attendance until they complete their credits for graduation.

The PCM Head of School will develop and maintain special education procedures necessary to implement this policy. This policy and the procedures will be available to the public.

**Legal References:**

[Chapter 28A.155 RCW Special education](#)

[RCW 28A.600.485 Restraint of students with individualized education programs or plans developed under section 504 of the rehabilitation act of 1973 — Procedures — Definitions.](#)

[RCW 28A.600.486 District policy on the use of isolation and restraint — Notice to parents and guardians of children who have individualized education programs or plans developed under section 504 of the rehabilitation act of 1973.](#)

[RCW 28A.605.020 Parents' Access to Classroom or School Sponsored Activities — Limitation](#)

[Chapter 49.60 RCW Discrimination — Human rights commission](#)

[Chapter 392-172A, WAC Rules for the provision of special education](#)

[29 U.S.C. 794 Section 504 of the Rehabilitation Act of 1973, as amended by the Rehabilitation Act Amendments of 1974, Pub. L. 93-516, 29 U.S.C. 794](#)

[20 U.S.C. 1400 et seq. Individuals with Disabilities Education Act of 2004](#)

[42 U.S.C. 12131-12133 Americans with Disabilities Act of 1990](#)

[28 CFR Part 35 Nondiscrimination on the Basis of Disability in State and Local Government Services](#)

[34 CFR Part 99 Family Education Rights and Privacy Act \(FERPA\)](#)

[34 CFR Part 104 Nondiscrimination on the basis of handicap in programs and activities receiving federal financial assistance](#)

[34 CFR Part 300 Assistance to States for the Education of Children With Disabilities](#)

[34 CFR Part 303 Early Intervention Program for Infants and Toddlers with Disabilities](#)

**Cross References:**

[2162 - Education of Students With Disabilities Under Section 504 of the Rehabilitation Act of 1973](#)

2163 - Response to Intervention

[3231 - Student Records](#)

[3241 - Student Discipline](#)

[3246 - Restraint, Isolation and Other Uses of Reasonable Force](#)

4217 - Effective Communication

**Management Resources:**

2021 - December Issue

2016 - March Issue

2014 - June Issue

2009 - October Issue

Policy News, December 2007 Updated Special Education

Policy and Procedure



# **PULLMAN** **PUBLIC** **COMMUNITY** **FREE** **MONTessori** **K-9**

- 83 Policy News, June 2007 Graduation Ceremonies for Special
- 84 Education Students
- 85 Policy News, December 1999 Rule Adoption Leads to Special

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**POLICY #4040****Public Access to LEA Records****Adopted – x****Last Revised** – WSSDA: 07/2017**Prior Revised Dates** – WSSDA: 08/1998; 10/2005; 05/2006; 02/2010; 12/2011; 04/2015; 12/2015

Consistent with Washington State law, the Pullman Community Montessori Board of Trustees is committed to providing the public full access to records concerning the administration and operations of the LEA. Such access promotes important public policy, maintains public confidence in the fairness of governmental processes, and protects the community's interest in the control and operation of its common school LEA. At the same time, the Board desires to preserve the efficient administration of government and acknowledges the privacy rights of individuals whose records may be maintained by the LEA. This policy and the accompanying procedure are intended to facilitate access to school LEA records without compromising operational efficiency or privacy rights.

As used in this policy and the accompanying procedure, "school LEA records" is a broad term that includes any writing containing information relating to the conduct of the LEA or the performance of any LEA governmental or proprietary function prepared, owned, used, or retained by the LEA regardless of physical form or characteristics. A "writing" as used in this policy and procedure is likewise a broad term that means any handwriting, typewriting, printing, photocopying, photographing, or other means of recording any form of communication or representation. Included within these definitions are digital and electronic forms of communication, including emails, texts or messages through any medium or application, pages, postings and comments from any LEA-operated or LEA-sponsored website. The LEA will retain public records in compliance with state law and regulations.

The definition of "school LEA records" does not include records that are not otherwise required to be retained by the LEA and are held by volunteers who do not serve in an administrative capacity, have not been appointed by the LEA to a LEA board, commission, or internship, and do not have a supervisory role or delegated LEA authority.

Because of the tremendous volume and diversity of records continuously generated by a public school LEA, the Board has declared by formal resolution that trying to maintain a current index of all of the LEA's records would be impracticable, unduly burdensome, and ultimately interfere with the operational work of the LEA. Additionally, the Board hereby finds that it would be unduly burdensome to calculate the costs of producing public records, given the multiple different electronic and manual devices used to produce public records, as well as the fluctuating costs of LEA supplies and labor.

The Superintendent will develop—and the Board will periodically review—procedures consistent with state law that will facilitate this policy. The Superintendent will also appoint a Public Records Officer who will serve as a point of contact for members of the public who request the disclosure of public



records. The Public Records Officer will be trained in the laws and regulations governing the retention and disclosure of records, and shall oversee the LEA's compliance with this policy and state law.

**Legal References:**

Chapter 5.60 RCW WITNESSES — COMPETENCY

Chapter 13.04.155(3) RCW Notification to school principal of conviction, adjudication, or diversion agreement — Provision of information to teachers and other personnel — Confidentiality.

Chapter 26.44.010 RCW Declaration of purpose.

Chapter 26.44.030(9) RCW Reports — Duty and authority to make — Duty of receiving agency — Duty to notify — Case planning and consultation — Penalty for unauthorized exchange of information — Filing dependency petitions — Investigations — Interviews of children — Records — Risk assessment process.

Chapter 28A.605.030 RCW Student education records — Parental review — Release of records — Procedure.

Chapter 28A.635.040 RCW Examination questions — Disclosing — Penalty.

Chapter 40.14 RCW Preservation and destruction of public records

Chapter 42.17A RCW Campaign Disclosure and Contribution

Chapter 42.56 RCW Public Records Act

WAC 392-172A Rules for the provision of special education

Public Law 98-24, Section 527 of the Public Health Services Act, 42 USC § 290dd-2

20 U.S.C. 1232g Federal Education Rights Privacy Act (FERPA)

20 U.S.C. § 1400 et. seq. Individuals with Disabilities Education Act (IDEA)

42 U.S.C. § 1758(b)(6)

34 CFR Part 300—ASSISTANCE TO STATES FOR THE EDUCATION OF CHILDREN WITH DISABILITIES

45 CFR Part 160—164—GENERAL ADMINISTRATIVE REQUIREMENTS, ADMINISTRATIVE REQUIREMENTS AND SECURITY AND PRIVACY

**Cross References:**

3231 - Student Records

**Management Resources:**

2017 - July Issue

2015 - December Issue

2015 - April Issue

2012 - April Issue

2010 - February Issue

Policy News, June 2006

Policy News, October 2005





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- 80 Washington State Office of the Attorney General – Open Government Training
- 81 Washington State Office of the Attorney General – Model Rules on Public Disclosure

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**POLICY #2161P****Special Education and Related Services for Eligible Students Procedure****Adopted** – 5/2021**Last Revised** – PCM: x/2022, WSSDA: 12/2021**Prior Revised Dates** – WSSDA: 10/2000, 10/2002, 12/2007, 10/2009, 12/2011, 06/2014, 3/2016 PCM 5/2021

The purpose of the Pullman Community Montessori (PCM) school's special education program procedures is to address program areas where state and federal regulations require specific local procedures or permit local discretionary choices.

The state regulations governing implementation of special education services pursuant to the Individuals with Disabilities Education Improvement Act (IDEA) of 2004 are addressed in [Chapter 392-172A WAC](#). These procedures do not address all of the requirements established in the regulations. PCM personnel who are not familiar with the regulations need to contact the special education department director if there are questions regarding special education. These procedures describe how PCM implements its special education program.

**Free Appropriate Public Education (FAPE)**

PCM will apply annually for Federal Part B and state special education funding to assist in the provision of special education and any necessary related services. This funding is in addition to students' basic education funding and state special education funding.

The Head of School, in consultation with building staff, will annually determine whether to use Early Intervening Services (EIS) funding for students who have not been identified as needing special education or related services, but who need additional academic and behavioral support to succeed in a general education environment.

PCM will annually report to the Office of Superintendent of Public Instruction (OSPI) the number of students receiving EIS; and the number of students who received EIS and subsequently received special education and related services under Part B of IDEA during the preceding two-year period.

Services to eligible special education students, age three to 21, will be provided without charge to the student. This does not include incidental fees that are normally charged to all students. Special education services will include preschool, elementary, and secondary education and are provided in conformance with the student's Individualized Education Program (IEP).

PCM provides a continuum of services for the students it serves who are eligible for special education services from kindergarten through age 21, regardless of the funding source. Where PCM is unable to provide all or part of the special education or necessary related services, it will make arrangements



through contracts with other public or non-public sources, inter-PCM agreements, or interagency coordination.

#### **Students Covered by Public or Private Insurance**

PCM may use Medicaid or other public insurance benefits programs in which a student participates to provide or pay for services required to provide a FAPE, as permitted by the public insurance program. However, PCM will not:

- A. Require parents to sign up for or enroll in public benefits or insurance programs in order for their student to receive FAPE under Part B of the IDEA;
- B. Require parents to incur an out-of-pocket expense such as the payment of a deductible or co-pay amount incurred in filing a claim;
- C. Use a parent or student's benefits under a public insurance program if that use would:
  1. Decrease available lifetime coverage or any other insured benefit;
  2. Result in the family paying for services required after school hours that would otherwise be covered by the public insurance program;
  3. Increase premiums or result in discontinuation of insurance; or
  4. Risk loss of eligibility for home and community-based waivers, based on aggregate health-related expenditures.

PCM may access a parent's private insurance proceeds to provide FAPE to an eligible student only if the parent provides informed consent to PCM. Whenever PCM proposes to access the parent's private insurance proceeds, PCM will:

- A. Obtain parent consent in accordance with [Chapter 392-172A WAC](#) each time PCM wishes to access benefits for a new procedure; and
- B. Inform the parents that their refusal to permit PCM to access their insurance does not relieve PCM of its responsibility to ensure that all required services are provided at no cost to the parents.

Before first accessing a parent's or student's public benefits, for the first time and annually after the first notification, PCM will provide written notification using the prior written notice provisions under [WAC 392-172A-07005\(3\)](#) that includes:

- A. a statement of the parental consent provisions;
- B. a statement of the "no cost" provisions;
- C. a statement that the parents may withdraw their consent to disclose personally identifiable information to the agency responsible for administering the state's public benefits or insurance, and
- D. a statement that a parent's withdrawal or refusal to consent does not relieve the school PCM of its responsibility to ensure that all required services are provided at no cost to the parents.



After providing the required notification, PCM will obtain written informed consent from the parent allowing PCM to disclose information from the student's educational records to the agency responsible for administering the state's public benefits or insurance programs. The consent will specify:

1. The personally identifiable information that may be disclosed, such as records or information about the services that may be provided to the student;
2. The purpose of the disclosure;
3. The agency to which the disclosure will be made; and
4. That the parent understands and agrees that the public agency may access the parent's or student's public benefits or insurance to pay for services under the act.

To avoid financial cost to parents who would otherwise consent to use private insurance, or public benefits if the parent would incur a cost such as a deductible or co-pay, PCM may use its Part B funds to pay the cost the parents would incur.

The Director of Specialized programs is responsible for providing the required notices and requests for consent to parents under this section.

### **Parent Participation in Meetings**

PCM encourages parental involvement and sharing of information between PCM and parents to support the provision of appropriate services to its students. As used in these procedures, the term "parent" includes biological and adoptive parents, legal guardians, persons acting in the place of a parent, such as relatives and stepparents, foster parents, persons appointed as surrogate parents, and adult students whose rights to educational decision-making have transferred to them.

Parents (and as appropriate, students) will be provided the opportunity to participate in any meetings with respect to the identification, evaluation, educational placement, and provision of a FAPE, including IEP team meetings, school discipline, and truancy meetings.

When a meeting is scheduled parents will be:

- A. Notified of the meeting early enough that they will have an opportunity to attend;
- B. Notified of the availability of interpretation and translation services at no cost to the parents;
- C. Notified of the purpose, time, and location of the meeting and who will be in attendance;
- D. The parent will be notified that PCM or the parent may invite others who have knowledge or special expertise of the student; and
- E. The meetings will be scheduled at a mutually agreeable time and place.

PCM will take whatever action is necessary to ensure that the parent understands invitations to attend IEP meetings and the proceedings of the IEP team meeting, including but not limited to, notifying the parents in their native language of the availability of interpretation/translation services at no cost to the



parents and arranging for an interpreter for parents who are deaf or hard of hearing or whose native language is other than English. PCM will maintain documentation of the language in which families prefer to communicate and whether a qualified interpreter for the student's family was provided.

The staff person responsible for inviting the parents to meetings will keep documentation of the information provided and the methods used to notify the parents of the meeting. PCM may proceed with a meeting only if PCM is not able to convince the parent to attend. In this case, PCM will document its attempts to arrange the meeting. This documentation will include records of telephone calls and the results, copies of correspondence sent to the parent, and/or other means used to contact the parent.

This documentation will be kept in the student's special education file. The Director of Specialized programs is responsible for notification, form use, and making any other arrangements necessary.

If the parent cannot attend a meeting but wishes to participate, PCM will arrange for other means to participate. This can include individual or conference phone calls, or video.

A meeting does not include informal or unscheduled conversations involving PCM personnel; conversations on issues such as teaching methodology, lesson plans, coordination of service provisions; or preparatory activities that PCM personnel engage in to develop a proposal or a response to a parent proposal to be discussed at a later meeting.

### **Identification and Referral (Child Find)**

#### **A. Identification**

The purpose of Child Find is to locate, evaluate, and identify children with suspected disabilities in need of special education services including those who are not currently receiving special education and related services and who may be eligible for those services. Activities are to reach:

1. Children enrolled in PCM boundaries including preschool-aged children;
2. Children attending approved, nonprofit private elementary and secondary schools located within the district boundaries.
3. Highly mobile children (such as children experiencing homelessness, in foster care, and living in migrant conditions);
4. Children who have a disability and may need special education services even though they are advancing from grade to grade; and
5. Children at home or home-schooled.

PCM reaches students who may be eligible for special education services through:

1. Notification to parents of child find activities in its annual informational packet;
2. Notification to parents PCM-wide through local papers or other media;
3. Information regarding child find on PCM's website;





4. Posting notices regarding screening and referral in school buildings and public locations including DSHS community service offices, Employment Security offices, grocery stores, Laundromats, day cares, community preschool sites, and physicians' offices;
5. Coordination with other public and private agencies and practitioners;
6. Written information provided to PCM staff on referral procedures;
7. Training teachers and administrators on referral/evaluation/identification procedures;
8. Review of student behavior, discipline, and absentee information and information gathered from PCM-wide assessment activities; and
9. Provision of optional special education referral forms available in the requestor's native language or with the support of a qualified interpreter for requesting an initial special education evaluation.

When PCM staff have concerns that a student may have a suspected disability which could result in eligibility for special education services, they will notify the Montessori Instructional Coach and Director of Specialized Programs.

When parents or others inquire about screenings, the caller will be referred to the Director of Specialized Programs. The screening process involves the following:

1. Parents are asked to provide information to assist in assessing their child; and
2. Children are screened to assess cognitive, communication, physical, social-emotional and adaptive development.

Parents will be notified at the screening of the results and the parents will also be provided written notice of the results within ten (10) days of the screening. If the screening supports evaluation, obtain written consent for evaluation at the exit interview if possible, or include consent forms with the written notice notifying the parents of the results. If the screening results indicate that the child does not need an evaluation, written notice will be sent to the parents within ten (10) days of the screening explaining the basis for the school's decision not to evaluate. Evaluation occurs in accordance with evaluation procedures.

#### A. **Referral**

A student, whether or not enrolled in school, may be referred for a special education evaluation by parents, PCM staff, or other persons knowledgeable about the student. Each building principal will designate a person responsible for ensuring that PCM staff understands the referral process and maintain the availability of PCM's optional referral form. Referrals are required to be in writing unless the person referring is unable to write and/or communicate orally. A person who makes a referral orally must be provided with the optional PCM referral form in the requestor's native language and offered assistance in completing the referral with the support of a qualified interpreter when needed.

When a referral is made, PCM must act within a 25 school-day timeline to make a decision about whether or not the student will receive an evaluation for eligibility for special education services.

All certificated employees will document referrals immediately upon a referral being made to or by



them. All other staff receiving a referral from another person will notify a certificated staff member. The Director of Specialized Programs: (a) records the referral; (b) provides written notice of the referral to the parent, including the date the request was received; and (c) the Child Study Team to collect and review PCM data and information provided by the parent to determine whether evaluation is warranted.

During the referral period Director of Specialized Programs will collect and review existing information from all sources, including parents. Examples may include:

1. Child's history, including developmental milestones;
2. Report cards and progress reports;
3. Individual teacher's or other provider information regarding the child including observations;
4. Assessment data;
5. Medical information, if provided; and
6. Other information that may be relevant to assist in determining whether the child should be evaluated.


If the review of data occurs at a meeting, the parent will be invited. The Director of Specialized Programs provides written notice to the parents of the decision regarding evaluation, whether or not the parents attend the meeting.

Recommendations regarding evaluation are forwarded to the Director of Specialized Programs.

PCM teams contributing to the establishment and review of documents such as IEPs and 504s include:

Name	Composition	Focus
<b>Community Team (CT)</b>	Applicable instructional staff, Montessori coach, parents/guardians, other specialists (nurse, guidance counselor), core student support person,* and student.	Analyzes student data brought forth and designs accommodation plans that will be closely monitored by the Montessori coach. Follow up after 4-6 weeks to assess if a recommendation should be made to 504 Team or Dynamic Support Team for heightened accommodation or intervention. May run multiple cycles of specialized accommodations to gather necessary data.
<b>Dynamic Support Team (DST)</b>	CT plus 504 coordinator and SpEd coordinator.	Considers recommendations from CT for students not immediately referred to the 504 Team who are suspected to need specialized services. DST evaluates data to make determinations and may implement advanced accommodation plans to determine if student should be referred to the Evaluation Team to formally test for SpEd eligibility. Based on data they may make the following referrals.



Accommodations needed	Formal evaluation for special education needed	No elevated team services needed
	<b>Evaluation Team.</b> This multidisciplinary team will use a suite of qualitative and quantitative data to determine if the student qualifies for SpEd services. Based on results they may recommend the following:	
		
<b>504 Team</b> (CT plus 504 coordinator): Designs and monitors 504 plans. Frequently communicates with parent (in collaboration with classroom teacher) on student progress.	<b>IEP Team</b> (in accordance with WAC 392-172A-03095): Develops and oversees implementation of the IEP. Evaluates the plan's effectiveness annually and as needed throughout school year, and develops future plans as needed.	<b>Community Team:</b> If a student is not in need of a 504 or IEP plan, CT will work with families and school staff to develop a new intervention plan.

*\*A core student support person may be added if the student has a strong bond with someone other than the parent member (belief system leader, coach, older sibling, etc.) that may lend support outside of school to the student. This person's addition will be upon the request of the student and approval by the parents/guardians.*

After the Dynamic Support Team reviews the request for evaluation and supporting data and does not suspect that the child has a disability, PCM may deny the request. In this case written notice, including the reason for the denial and the information used as the basis for the denial, must be given to the parent.

If the determination is that the child should be evaluated, the reviewers will include information about the recommended areas of evaluation, including the need for further medical evaluation of the student. This information will assist PCM in providing parents prior written notice and will assist PCM in selecting appropriate evaluation group members. Director of Specialized Programs is responsible for notifying parents of the results using prior written notice. When the determination is that the child will be evaluated, parent consent for evaluation and consent for release of appropriate records will be sent with the notice.

PCM Director of Specialized Programs will attempt without unnecessary delay to obtain parental consent to conduct the evaluation, fully evaluate the student, and arrive at a decision regarding eligibility within 35 days of obtaining written consent for an evaluation, subject to limited exceptions enumerated in WAC 392-172A-03005.

PCM is not required to obtain consent from the biological parent if:

1. The student is a ward of the state and does not reside with a parent;
2. The parent cannot be located, or their rights have been terminated; or





3. Consent for an evaluation is given by an individual appointed to represent the student.

When the parent provides consent, PCM will select an evaluation group. The evaluation group is to complete the evaluation within 35 school days after PCM's receipt of parent consent, unless:

1. The parents and PCM agree in writing to extend the timeline;
2. The parent fails or refuses to make the student available for the evaluation; or
3. The student enrolls in another LEA after the evaluation is begun, but before completion, and the parent and new LEA have an agreement for completion of the evaluation.

If a parent does not provide written, informed consent for the evaluation, notify Director of Specialized Programs. PCM staff will make a determination as to whether it wishes to use mediation to seek agreement to evaluate or file a due process hearing to override the parent's refusal to consent. PCM may not override a parent's refusal to consent for an evaluation if the student is homeschooled. If the parent does not provide written informed consent and PCM does not use mediation or due process, the Director of Specialized Programs will provide the parent with prior written notice informing the parent that PCM cannot proceed with the evaluation to determine eligibility and is not responsible for providing special education and related services without an initial evaluation to determine eligibility.

## **Evaluation and Reevaluation**

### **A. PCM Evaluation Requirements**

The purpose of the evaluation is to collect information about a student's functional, developmental, and academic skills and achievements from a variety of sources, to determine whether a student qualifies for special education and related services, and to develop an IEP. This includes information provided by the parent. All information gathered in this process is reviewed by the IEP team or other group of qualified professionals.

The evaluation must be an individual assessment designed to determine:

1. Whether the student is eligible for special education and any necessary related services; and,
2. The nature and extent of special education and related services needed by the student, including information related to enabling the child to be involved in and progress in the general education curriculum.

PCM's Director of Specialized Programs select the members of the evaluation group. Members selected must be knowledgeable about the student and the areas of suspected disabilities. Qualifications of a group member include having the appropriate professional license or certification and may include outside practitioners when necessary. When assessing for specific learning disabilities, the parent and a group of qualified professionals must be part of the group. If the student requires a medical evaluation in order to determine eligibility, PCM will coordinate with the parents to arrange for the evaluation at



PCM expense or through the use of public or private insurance if the parent consents to allow PCM to use the insurance.

There are many legal requirements for conducting evaluations. They must be completed in accordance with WAC 392-172A-03005 through 392-172A-03080. Evaluation procedures or materials must be free of racial, cultural, or sexual/gender bias and they must be used for the purpose for which they are valid and reliable. Tests must be appropriate for the student's age and stage of developmental level. Tests should be administered in the native language of the student or conducted in the mode of communication most familiar to the student. If it appears to be clearly not feasible to conduct a procedure or test in the mode of communication most frequently used by the student, the IEP team will contact the special education administrator to develop an individualized strategy for valid evaluation of the student's skills. The inclusion of parents in this collaboration is desirable and strongly encouraged.

Specific areas to be included in the evaluation are determined by Director of Specialized Programs and other qualified professionals, as appropriate, as part of a review of existing data concerning the student. The evaluation does not rely on one source or procedure as the sole criterion for determination and should include:

1. Review of existing data, including corresponding response to intervention (RTI) documentation;
2. Relevant functional and developmental information;
3. Information from parents;
4. Information from other providers;
5. Information related to enabling access to and progress within the general education curriculum and assisting in determining whether there is a disability and the content of the IEP;
6. Current classroom-based evaluations, using criterion-referenced and curriculum-based methods, anecdotal records, and observations;
7. Teacher and related service providers' observations; and
8. Testing and other evaluation materials, which may include medical or other evaluations when necessary.

All current evaluation data as well as data previously reviewed by the team must be considered. Professional members of the evaluation team need to be familiar with qualifying disability definitions and criteria in federal and state rules.

This review of existing data may be in the form of a meeting of IEP team members, or may be conducted without a meeting. It includes data provided by parents, data gathered in the general education classroom, or data from state and PCM level assessments. The data may provide information about the student's physical condition, social or cultural background, and adaptive behavior.

When additional assessments are necessary, the group members have the responsibility of selecting, administering, interpreting, and making judgments about evaluation methods and results, and ensuring that the tests and assessments are administered by qualified personnel in accordance with the



instructions of the test producer. The gathering of additional data in combination with existing data must be sufficiently comprehensive to address all areas of the suspected disability and any special education needs, whether linked to the disability category or not. If the IEP Team determines that no additional data are needed, the IEP team will notify the student's parent of that determination and the reasons for it, and inform them of their right to request additional assessments. PCM will complete the evaluation using existing data.

Parents and PCM staff are encouraged to work towards consensus, but PCM has the ultimate responsibility to determine whether the student has a disability or not. The Director of Specialized Programs will provide the parent with prior written notice of the eligibility decision, as well as a copy of the evaluation report. If the parent disagrees with the eligibility decision they will be informed of their dispute resolution options described in the procedural safeguards.

#### A. **Specific Learning Disability (SLD)**

The school uses a combination of severe discrepancy (SD) and a process based on a student's response to scientific, research-based intervention in determining the identification of students with a specific learning disability consistent with PCM's MTSS Plan.

Student response is only one element of determining whether a child has a specific learning disability. The evaluation will be comprehensive and address all areas of suspected disability and will also include whether the child performs adequately to meet the grade-level standards in the general curriculum. The evaluation will also include whether failure to make progress is or is not the result of:

1. A physical, mental, emotional, cultural or environmental factor or limited English proficiency; or
2. Inadequate instruction in reading or mathematics.

PCM must act promptly on a referral. Anyone, including parents and teachers, can make a referral at any time. A student cannot be required to progress through all levels of intervention before being evaluated if evidence exists to suspect a disability.)

#### A. **Evaluation of Transfer Students**

If a student transfers into PCM while an evaluation process is pending from the other PCM, the Director of Specialized Programs is responsible for determining the status of evaluations conducted to date and making a determination as to whether the evaluation can be completed within the 35 school day timeline from the date the parent provided consent. If the determination is that additional time will be needed, the Director of Specialized Programs will notify the parent and obtain the parent's agreement to establish a new timeline.

#### B. **Eligibility**

The evaluation group and the parent will determine whether or not the student is eligible for special



education services.

1. A student is not eligible if the determinant factor is lack of appropriate instruction in reading or math, based upon the state's grade level expectations or limited English proficiency; and
2. Eligibility may be determined by documented professional judgment when:
  1. Properly validated tests are unavailable; or
  2. Corroborating evidence indicates that results were influenced due to measuring a disability.

The parent will be provided with a copy of the evaluation report and the documentation of determination of eligibility.

Parents will also be provided with prior written notice of the eligibility decision within ten school days of the decision. The Director of Specialized Programs is responsible for sending the notice.

Students remain eligible for special education services until one of four events occur:

1. The student is determined through a reevaluation to no longer be eligible for special education;
2. The student has met PCM's high school graduation requirements;
3. The student has reached age 21. A special education student whose 21st birthday occurs after August 31, will continue to be eligible for special education and any necessary related services for the remainder of the school year; or
4. The student no longer receives special education services based upon a parent's written revocation of services.

When a special education student is expected to graduate prior to age 21, or when graduation is part of the transition plan, the IEP team will document a student's progress towards achieving course credits towards graduation on the transition portion of the IEP. PCM will provide prior written notice to parents and adult students that the student is expected to graduate and will no longer be eligible for special education services. PCM will also provide the parents and student with a summary of academic achievement and functional performance and recommendations to assist the student with postsecondary goals.

#### **A. Evaluation Report**

Each person conducting an assessment of the student will specify the procedures and instruments used and their results and the significance of findings related to the student's instructional program, including a specification of the factors interfering with performance and the special education and related services needed.

The evaluation group will determine who is most appropriate to develop the evaluation report



reflecting the evaluation information. This will be completed before the conclusion of the evaluation period and will, at a minimum:

1. Identify the disability that requires special education and related services, if a disability exists;
2. Discuss assessments and review data supporting conclusions regarding eligibility;
3. Include the additional information required for the specific learning disability eligibility category;
4. Describe how the disability or disabilities affect the student's involvement and progress in the general curriculum;
5. Make recommendations to the IEP team with respect to special education and related services needed, materials or equipment, instructional and curricular practices, student management strategies, the need for extended school year services beyond 180 school days, and location of services;
6. Include other information, as determined through the evaluation process and parent input;
7. Include the additional information required for the specific learning disability eligibility category;
8. Provide any necessary professional judgments and the facts or reasons in support of the judgments; and
9. Be signed and dated by the evaluation group members certifying their agreement. Any group member who disagrees with the conclusions of the report will prepare a separate statement representing their own conclusion.
10. The Director of Specialized Programs is responsible for notifying parents of the date, time and location of evaluation meetings by following the procedures in the parent participation section for inviting parents to meetings.

#### A. **Reevaluations**

A reevaluation of a student receiving special education or related services is conducted if academic achievement and functional performance has improved to warrant a reevaluation, if the IEP team suspects that the student may no longer be a student with a disability or if the child's parent or teacher requests a reevaluation. A reevaluation does not occur more than once per year, unless parent and school agree otherwise. A reevaluation must occur at least once every three years, unless parent and school staff agree that a reevaluation is unnecessary. An agreement that an evaluation is unnecessary will be confirmed in writing to the parent. The Director of Specialized Programs will schedule a review of this determination and notify the special education department.

Students who turn six who met the eligibility requirements for the disability category of "Developmentally Delayed" (DD) under the criteria for ages three to six years need not be reevaluated at age nine under the criteria for six to nine years until three years after their initial evaluation was completed.





Students who were previously eligible under the category "Developmentally Delayed" must be reevaluated before age ten to determine eligibility within another category in order to continue receiving special education services.

As part of any reevaluation, the IEP team members and other professionals PCM determines appropriate will review existing data that includes:

1. Evaluations and information provided by the parents;
2. Current classroom-based assessment, local or state assessments, and classroom-based observations; and
3. Observations by other teachers and related services providers data.

Based on this review the team will determine whether any additional data is necessary to determine:

1. Whether the student continues to be eligible for special education and any necessary related services;
2. The present levels of performance and educational needs; and
3. Whether any additions or modifications to the student's program are needed. This review can occur with or without a meeting or through individual review. If the IEP team members and any other persons reviewing the data determine that no further testing is necessary, PCM will notify the parents of this determination, using written prior notice and will inform parents that they have the right to request assessments if they disagree with the determination that additional testing is not necessary. Parent consent is not required if the reevaluation does not require additional testing.
4. If additional testing is needed:
  1. The Director of Specialized Programs will request written parental consent for reevaluation and provide prior written notice identifying the areas of assessment;
  2. If the parents do not return the signed consent form, PCM will send another letter explaining the need for reevaluation and parent consent and will enclose another consent form and a copy of the prior written notice. In addition, PCM will document its reasonable attempts to obtain consent such as telephone calls, emails, personal contact, and other efforts to obtain consent;
  3. If the parents do not respond to the request for consent, and PCM has documented its reasonable attempts to obtain consent, PCM can proceed with the reevaluation; and
  4. If the parents refuse to consent to the reevaluation, the evaluation group will notify the Director of Specialized Programs so that PCM can determine whether it will seek mediation in order to obtain consent or request a due process hearing to ask an administrative judge to override the parents' refusal to consent.

After the reevaluation is completed, the Director of Specialized Programs will both invite parents to the eligibility meeting and will provide prior written notice after the meeting of the results of the



reevaluation to parents in their primary language, indicating one or more of the following:

1. Whether the student continues to be eligible and in need of special education;
2. Present levels of performance and educational needs of the student; and
3. Whether any additions or modifications to the special education and related services are needed to enable the student to meet IEP annual goals and to participate, as appropriate, in the general curriculum.

This notice will occur within ten school days of the eligibility decision. The Director of Specialized Programs is responsible for sending the notice.

#### **A.      Reevaluation and Graduation**

No reevaluation is required when special education eligibility terminates due to graduation from high school with a regular diploma or due to reaching the end of the school year during which the student turned 21. Instead, PCM will provide prior written notice to the student and the parent one month before the student's anticipated last day of school and the IEP team will provide the student with a summary of academic achievement and functional performance including recommendations on how to assist the student in meeting post-secondary goals. The IEP team must also document that parents were informed whether it is recommended that the student's academic achievement be measured using an alternative state assessment. This notice must also explain whether and how alternate assessments may delay or otherwise affect the student from completing the requirements for a regular high school diploma. The Director of Specialize Programs is responsible for assuring that the IEP team completes the summary of academic achievement and functional performance.

#### **Independent Educational Evaluations (IEE)**

Parents of students eligible for special education, students referred for special education and determined to not be eligible, or students determined not to need an evaluation have a right to obtain an IEE at public expense, each time PCM has conducted or obtained an evaluation of the student.

When parents request an IEE, PCM must decide within 15 calendar days whether or not it agrees to provide it. Any parent request for an independent evaluation should be immediately referred to Director of Specialize Programs. The Director of Specialize Programs will review the request and determine whether or not the request is warranted. If PCM agrees to provide an IEE, arrangements will be made promptly. If PCM denies the request to pay for an IEE, it must file for a due process hearing within 15 calendar days of the parent's request. PCM may request mediation as an option after filing the due process hearing. If the parents withdraw their request for an IEE, the due process hearing can be dismissed.

When a parent requests an IEE, PCM must provide parents a list of PCM criteria and evaluators. If PCM initiates a hearing and a decision is made that PCM's evaluation is appropriate, the parent still has the right to an IEE, but not at public expense. A parent is entitled to only one IEE at public expense each time PCM has conducted an evaluation with which the parent disagrees.



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549 If the parent obtains an IEE at either public or private expense, any results of the IEE must be considered  
550 by PCM if providing FAPE. The IEE may also be presented as evidence at a hearing regarding the  
551 student.

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553 The following criteria are established for the selection of an individual to conduct an IEE at public  
554 expense. These criteria are established in order to identify the knowledge, experience, and qualifications  
555 of individuals selected to conduct the evaluations. Any individual selected to conduct either a PCM  
556 evaluation or an IEE must be:

557

- 558 1. Licensed, credentialed, or otherwise qualified within the state of Washington or state of  
559 residence/practice to perform an evaluation in the specific professional discipline for which an  
560 independent evaluation is sought;
- 561 2. Knowledgeable and experienced in evaluating children with similar disabilities;
- 562 3. Geographically located within the state of Washington (PCMs may wish to specifically expand  
563 the criteria to include practitioners in other states/British Columbia); and
- 564 4. Available to PCM at a maximum fee which does not exceed by more than 25% the prevailing  
565 average for similar evaluations within the state of Washington.

566

567 Exceptions to the criteria will be granted only when it can be shown that the unique circumstances of  
568 the child or the disability:

569

- 570 1. Make it impossible to identify anyone within the state of Washington who holds the appropriate  
571 credentials or experience necessary to conduct the evaluation; or
- 572 2. Require a specialized evaluator whose fee exceeds the prevailing average by more than 25%; or
- 573 3. Include factors which would warrant an exception in order to obtain an appropriate evaluation.

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## 575 **Individualized Education Programs (IEP)**

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### 577 **A. IEP Development**

578 The term IEP means a written statement for each student eligible for special education that is  
579 developed, reviewed, and revised in a meeting in accordance with WAC 392-172A-03095  
580 through WAC 392-172A-03100. The IEP reflects the implementation of instructional programs  
581 and other services for students who are eligible for special education services, based on the  
582 evaluation of student needs. IEP teams should be proactive in providing parents notice of their  
583 right to observe proposed educational placements in order to delay implementation of an IEP.

584

585 An IEP must be in effect before initiation of special education services. The IEP must be  
586 developed within 30 calendar days after the student's initial determination of eligibility for  
587 special services. IEPs must be updated annually, or revised more frequently if needed to adjust  
588 the program and services.

589





Parent consent is required before the initial provision of special education services. If a parent refuses to consent to the provision of special education services, PCM may not use mediation or due process to override a parent's refusal. When a parent refuses to provide consent the Director of Specialize Programs will notify the parent that PCM does not have a FAPE obligation to the student. The notification will be documented in the student's file.

PCM will maintain a copy of the current IEP, which is accessible to all staff members responsible for providing education, other services, or implementation of the IEP. All staff members will be informed of their responsibilities for its implementation. This includes not only teachers and other service providers, but also bus drivers, playground and lunchroom supervisors, nursing staff, and others who may be responsible for the proper implementation. The building Head of School is responsible for ensuring that staff members are knowledgeable about their responsibilities.

IEPs will be implemented without undue delay following IEP meetings, regardless of the payment source for special education and or related services.

Parents are members of the IEP team and will have the opportunity to participate fully. PCM will make sure that the parents understand the proceedings, including arranging for an interpreter for parents who are deaf or whose native language is other than English. PCM will also ensure that meeting locations are accessible. The Director of Specialize Programs is responsible for coordinating interpreters and making arrangements for the meeting location.

PCM will provide parents/guardians with a copy of PCM's Restraint, Isolation and Other Uses of Reasonable Force (*Policy 3246*) with each initial and annual IEP.

**A. IEP Team**

The IEP team includes:

1. The parent(s) of the student;
2. Not less than one general education teacher (or preschool teacher) of the student if the student is, or will be, participating in the general education environment. The general education teacher will, to the extent appropriate, participate in development of the student's IEP, including determinations of: 1) appropriate positive behavioral interventions and supports for the student; and 2) supplementary aids and services, program modifications, and support for school personnel consistent with WAC 392-172A-01185 and WAC 392-172A-03110(2)(b);
3. Not less than one special education teacher, or if appropriate, not less than one special education provider of the student;
4. A representative of PCM, who is qualified to provide or supervise the provision of special education and related services, is knowledgeable about general education curriculum, and is knowledgeable about the availability of PCM resources;



5. An individual who can interpret the instructional implications of the evaluation results;
6. Any other individuals who have knowledge or special expertise about the student. These individuals may be invited by both PCM and the parents, at the discretion of the person making the invitation;
7. The student, when appropriate, or when required;
8. Students must be invited when the purpose of the meeting includes discussion of transition needs or services;
9. If another agency is or may be responsible for payment or provision of transition services, an agency representative will be invited, with the parent's consent. If the agency representative cannot attend the meeting, PCM personnel will keep the representative informed of the meeting and obtain agency information that will assist in the service provision; and
10. Parents will be notified of the participation of the Part C service coordinator or other designated representatives of the Part C system as specified by the state PCMd educational agency for Part C at the initial IEP meeting for a child previously served under Part C of IDEA.

The parent and PCM must agree in writing before any of the above team members are excused from all or part of a meeting. If a team member's area of the IEP is being discussed or modified, then the parent and PCM must consent to their excusal; and that specific team member must provide advance written input for their part of the IEP prior to the meeting. A team members notification and written input should be sent to the Director of Specialized Programs. Parents may record meetings in accordance with PCM policies.

Existing team members may fill more than one of these roles if they meet the criteria for the role. Refer to the Parent Participation in Meetings for the requirements of a parent invitation to IEP meetings.

Sometimes parents do not attend IEP meetings. There will also be times the parents do not agree with the IEP as proposed, and despite attempts to reach agreement on IEP content, the team does not reach agreement. If a parent attends the IEP meeting and agreement is not reached on the IEP, the team will determine whether another IEP meeting should be scheduled as soon as mutually possible, or whether there is enough information to complete the IEP. When the decision is made that the IEP will be implemented PCM must send prior written notice of the decisions reached to the parent, including the date the IEP will be implemented.

When the parents do not attend the IEP meeting, despite PCM's efforts to ensure participation, or if the team does not reach agreement, it is PCM's obligation to offer an appropriate educational program:

1. Have IEP members present sign the IEP (or document participation if any member is unwilling to sign);
2. Send a copy to the parent, and provide the parent prior written notice that PCM intends to implement the IEP; and



3. Forward the documentation of actual or attempted contacts to Director of Specialized Programs for processing when parents do not attend the meeting.

When making changes to an IEP after the annual IEP meeting for a school year, the parent and PCM may agree not to convene an IEP meeting for the purpose of making changes. The parent and PCM must complete a written document indicating the changes and inform IEP team members and appropriate individuals of the changes. If the parent requests that PCM revise the IEP to include the amendments, the Director of Specialized Programs will revise the IEP.

**A. IEP Preparation and Content**

IEP teams will consider the recommendations in the initial or most recent evaluation to develop the IEP. In developing each IEP, the team must provide parents notice of their right to observe proposed educational placements and consider:

1. The strengths of the student including the academic, developmental, and functional needs of the student and the concerns of the parents for enhancing the education of their child;
2. Whether positive behavioral interventions and supports, including a behavioral intervention plan, as defined by WAC 392-172A-01031, are needed to address the student's behavior;
3. The language needs of the student as those needs relate to the student's IEP, for a student with limited English proficiency;
4. Whether Braille instruction is appropriate for a student who is blind or visually impaired;
5. The communication needs of the student (and in the case of a student who is deaf or hard of hearing, consider the student's language and communication needs), opportunities for direct communications with peers and professional personnel in the student's language and communication mode; academic level; and full range of needs, including opportunity for direct instruction in the student's language and communication mode; and
6. Whether assistive technology devices or services are needed.

IEP content must include:

1. The student's present levels of academic and functional performance with a description of how the disability(ies) affect the student's involvement and progress in the general curriculum or preschool activities;
2. Measurable academic and functional annual goals for the student (including benchmarks or short term objectives if the student is participating in alternate assessments) that will meet the student's needs resulting from the disability(ies) to enable involvement and progress in the general curriculum or in preschool activities, and will meet the student's other educational needs;



3. A statement of special education services, any necessary related services, and supplementary aids and services based on peer-reviewed research to the extent practicable to be provided to the student and program modifications or supports for personnel so that the student may advance towards annual goals, progress in the general curriculum, and be educated and participate with other special education students and non-disabled students, and participate in extracurricular and other nonacademic activities. Special education services may not be solely based on the disability category for which the student is eligible;
4. A statement of the extent, if any, that the student will not participate with non-disabled students in general classroom, extra-curricular, and non-academic activities;
5. A statement of any individual appropriate accommodations in the administration of state or PCM-wide assessments of student achievement that are needed to measure academic achievement and functional performance of the child on state assessments. If the team determines that the student will not participate in a particular assessment, the IEP will address why the student cannot participate in the regular assessment(s), why the particular alternative assessment is appropriate for the child, and document (a) that the parents were informed that their student's academic achievement will be measured on alternate standards, and (b) how participation in an alternate assessment may delay or otherwise affect the student from completing the requirements for a regular high school diploma;
6. The date for the beginning of services and the anticipated frequency, location, and duration of services and modifications;
7. A statement of how the student's progress towards goals will be measured, how the student's parents will be regularly informed of their child's progress towards the annual goals, and whether the progress is sufficient to enable the student to achieve the goal by the end of the year. Measurement of the student's progress will be based on the data collected as designated on the IEP. The individual responsible for implementing the goal is responsible for maintaining the data used to measure progress. Information to the parents can be provided at the same time PCM issues progress reports or report cards, or other agreed times as identified in the IEP.
8. The projected beginning date for the special education and related services;
9. With an IEP that is in effect when the child turns 16, or sooner if the IEP team determines it is appropriate, a statement of needed transition services and any interagency responsibilities or needed linkages. The transition component must include appropriate measurable postsecondary goals based on age appropriate transition and assessments related to training, education, employment, and independent living skills where appropriate; the transition services (including courses of study) needed to assist the child in reaching those goals; and a description of how the postsecondary goals and transition services align with the high school and beyond plan (HSBP);
10. Emergency response protocols, if determined necessary by the IEP team for the student to receive FAPE and parents provide consent. Emergency response protocols must meet the requirements stated in WAC 392-172A-02105;





11. A behavioral intervention plan (BIP), if determined necessary by the IEP team for a student to receive FAPE. The BIP must meet the requirements stated in WAC 392-172A-01031;
12. The procedures by which parents/guardians will be notified of the use of isolation or restraint or a restraint device on their student (*see Procedure 3246*).
13. A statement regarding transfer of rights at the age of majority. (*Indicate the appropriate staff*) will provide prior written notice to the student one year prior to student turning 18 years of age; and
14. Extended school year (ESY) services. The consideration for ESY services is a team decision, based on information provided in the evaluation report and based on the individual needs of a student. ESY services are not limited by categories of disability, or limited by type amount or duration of the services. If the need for ESY services is not addressed in the IEP and ESY services may be appropriate for the student, the IEP team will meet by (*insert date here*) to address the need for ESY. Factors for the team to consider when determining the need for ESY may include, but are not limited to: 1) Evidence of regression or recoupment time based on documented evidence; or 2) A documented determination based on the professional judgment of the IEP team including consideration of the nature and severity of the student's disability, the rate of progress, and emerging skills.

#### **Use of isolation, restraint and restraint devices:**

##### **A. Definitions**

1. **Imminent:** The state or condition of being likely to occur at any moment or near at hand, rather than distant or remote.
2. **Isolation:** Restricting a student alone within a room or any other form of enclosure, from which the student may not leave. It does not include a student's voluntary use of a quiet space for self-calming, or temporary removal of a student from his or her regular instructional area to an unlocked area for purposes of carrying out an appropriate positive behavior intervention plan.
3. **Likelihood of serious harm:** A substantial risk that physical harm will be inflicted by a student:
  1. upon his or her own person, as evidenced by threats or attempts to die by suicide or inflict physical harm on oneself;
  2. upon another, as evidenced by behavior that has caused such harm or that places another person or persons in reasonable fear of sustaining such harm;
  3. upon the property of others, as evidenced by behavior that has caused substantial loss or damage to the property of others; or
  4. after the student has threatened the physical safety of another and has history of one or more violent acts.



4. **Positive behavioral intervention:** Strategies and instruction that can be implemented in a strategic manner in order to provide alternatives to challenging behaviors, reinforce desired behaviors, and reduce or eliminate the frequency and severity of challenging behaviors. Positive behavioral interventions include the consideration of environmental factors that may trigger challenging behaviors and teaching a student the skills to manage his or her own behavior.
5. **Restraint:** Physical intervention or force used to control a student, including the use of a restraint device. It does not include appropriate use of a prescribed medical, orthopedic or therapeutic device when used as intended, such as to achieve proper body position, balance or alignment, or to permit a student to safely participate in activities. Restraints that involve prone (lying face-down), supine (lying face-up), wall restraints, or any other restraint that interferes with a student's breathing are prohibited.
6. **Restraint device:** A device used to assist in controlling a student, including, but not limited to, metal handcuffs, plastic ties, ankle restraints, leather cuffs, other hospital-type restraints, pepper spray, tasers, or batons. Restraint device does not mean a seat harness used to safely transport students. This definition is consistent with RCW 28A.600.485(1)(c) and is not intended to endorse or encourage the use of such devices or techniques with PCM students.

**B. Practices presumed to be unreasonable when correcting or restraining any student under the age of 18:**

Under RCW 9A.16.100, the following is a non-exclusive list of acts that are presumed unreasonable when correcting or restraining a child:

1. throwing, kicking, burning, or cutting a child;
2. striking a child with a closed fist;
3. shaking a child under the age of three;
4. interfering with a child's breathing;
5. threatening a child with a deadly weapon; or
6. doing any other act that is likely to cause bodily harm to a student greater than transient pain or minor temporary marks.

This non-exclusive list should not be read so as to imply that another, unlisted form of correction or restraint is permissible. Whether or not an unlisted use of force or restraint is presumptively permissible depends upon a balanced consideration of all relevant state laws and regulations, and whether the use is reasonable under the totality of the circumstances.

**A. Conditions specific to use of isolation:**

1. The isolation must be discontinued as soon as the likelihood of serious harm has dissipated;



2. The enclosure will be ventilated, lighted, and temperature controlled from inside or outside for purposes of human occupancy.
3. The isolation enclosure will permit continuous visual monitoring of the student from outside the enclosure.
4. An adult responsible for supervising the student will remain in visual or auditory range of the student at all times.
5. Either the student shall be capable of releasing himself or herself from the enclosure, or the student shall continuously remain within view of an adult responsible for supervising the student.
6. Any staff member or other adults using isolation must be trained and currently certified by a qualified provider in the use of trauma-informed crisis intervention (including de-escalation techniques), and also trained by PCM in isolation requirements, unless trained personnel are not immediately available due to the unforeseeable nature of the emergency.

**B. Conditions specific to use of restraint and restraint devices:**

1. The use of restraint or a restraint device must be discontinued as soon as the likelihood of serious harm has dissipated;
2. The restraint or restraint device will not interfere with the student's breathing. This includes, but is not limited to prone (lying face-down), supine (lying face-up), and wall restraints;
3. Any staff member or other adults using restraint or restraint devices must be trained and currently certified by a qualified provider in the use of trauma-informed crisis intervention (including de-escalation techniques), and such restraint or restraint devices, or otherwise available in the case of an emergency unless trained personnel are not immediately available due to the unforeseeable nature of the emergency.
4. In the case of a restraint device, either the student will be capable of releasing himself or herself from the restraint device or the student shall continuously remain within view of an adult responsible for supervising the student.

**C. Prohibited practices involving restraint, use of force, and discipline:**

The following practices are prohibited with students eligible for special education services:

1. PCM personnel are prohibited from using aversive interventions;
2. PCM personnel are prohibited from physically restraining or isolating a student, except when the student's behavior poses an imminent likelihood of serious harm as defined above;
3. No student may be stimulated by contact with electric current, including, but not limited to, tasers;



4. A student may not be denied or subjected to an unreasonable delay in the provision of food or liquid as a form of punishment;
5. A student may not be the recipient of force or restraint that is either unreasonable under the circumstances or deemed to be an unreasonable form of corporal punishment as a matter of state law (see above, for example, for a list of practices presumed to be unreasonable when used in correcting or restraining a child);
6. A student must not be denied or subjected to an unreasonable delay in the provision of common hygiene care;
7. A student must not be denied or subjected to an unreasonable delay in the provision of medication;
8. A student may not be excluded from his or her regular instructional or service area and isolated within a room or any other form of enclosure, except under the conditions set forth in WAC 392-172A-02110;
9. A student must not be forced to listen to noise or sound that the student finds painful;
10. A student must not be forced to smell or be sprayed in the face with a noxious or potentially harmful substance;
11. A student must not be forced to taste or ingest a substance which is not commonly consumed or which is not commonly consumed in its existing form or concentration;
12. A student's head must not be partially or wholly submerged in water or any other liquid;
13. A student must not be physically restrained or immobilized by binding or otherwise attaching the student's limbs together or by binding or otherwise attaching any part of the student's body to an object, except under the conditions set forth in WAC 392-172A.02110;
14. A student must not be subjected to the use of prone (lying face-down) and supine (lying face-up) restraint, wall restraint, or any restraint that interferes with the student's breathing.

#### **D. Documentation and Reporting Requirements**

PCMs must follow the documentation and reporting requirements for any use of isolation, restraint, or a restraint device consistent with RCW 28A.600.485 and the parental notification requirement of RCW 28A.155.210. See Policy and Procedure 3246. The director of the Specialized Programs is responsible for ensuring appropriate documentation and reporting for students with IEP's or 504's.

#### **Transfer Students**

Students who transfer from one PCM to another within the state continue to be eligible for special education and any necessary related services. When an eligible student transfers into PCM, the building Head of School or designated office staff will notify the Director of Specialized Programs. The Director of Specialized Programs, Montessori Coach and Head of School in consultation with parents will review the student's IEP to ensure PCM provides services comparable to those in the previous IEP until PCM adopts the previous IEP or develops, adopts and implements a new IEP.





When a student who was identified as eligible for special education transfers from out of state into PCM, the building Head of School or designated office staff will notify the Director of Specialized Programs as soon as possible. The Director of Specialized Programs will review the evaluation, eligibility documentation, and IEP to determine whether or not the student meets state eligibility criteria. If the student meets the state eligibility criteria, PCM will follow the procedures described in the previous paragraph to provide comparable services until PCM develops an IEP for the student. If the student needs to be evaluated to determine eligibility in this state, Director of Specialized Programs will notify the parents, obtain consent, and evaluate the student for eligibility within 35 school days of the receipt of the parent's consent. PCM, in consultation with the parents, will continue to provide special education services comparable to the services on the student's IEP, pending the results of the initial evaluation.

PCM must take reasonable steps to obtain records promptly, including IEP supporting documents and any other records related to special education or related services from the previous school. The director of the Specialized Programs is responsible for obtaining records and ensuring follow-up if the records are not provided.

#### **Placement**

No student may receive special education and related services without being determined eligible for services, and thus the evaluation process and IEP development precedes the determination of the special education placement. When a student has been evaluated and the evaluation team and parent have determined student eligibility and the need for special education and related services, programming decisions must occur. These decisions are made on the basis of information generated through the evaluation and IEP processes. The actual program is considered within the context of least restrictive environment (LRE) and the continuum of placement alternatives (reviewed below). When determining initial eligibility for special education, including determination of the appropriate placement, the parent or adult student must provide written consent for services before the student receives special education services. If the parents do not consent to the provision of special education and related services, PCM will not provide special education services to the student. PCM will notify the parents that the student is eligible for services and that PCM is willing to provide the services when the parent provides written consent. The notification will also inform parents that PCM has no FAPE obligation to the student when parents refuse to provide consent.

When program decisions are addressed by the IEP team, proper consideration must be given to the LRE. Within the educational setting, the student should be placed, whenever possible:

1. In the school the disabled student would normally attend; and
2. With non-disabled students in the general educational setting to the maximum extent possible.

Special classes, separate schools, or removal of students with disabilities from the general education environment occurs only when the nature or severity of the disability is such that education in the



965 general education classroom with use of supplementary aids and services cannot be satisfactorily  
966 achieved.

967  
968 If the IEP team believes that the student will not be successful within the general education classroom,  
969 the team will consider:

- 970  
971 1. The educational benefits of full-time placement in a regular classroom;  
972 2. The non-academic benefits of such a placement;  
973 3. The effect the student will have on the teacher and other students in the regular classroom; and  
974 4. The costs of placing the student in the regular classroom.

975  
976 The degree to which the student is to be integrated into the general classroom setting is dependent  
977 upon the identified needs of the student. This placement is to occur unless the nature of the needs are  
978 so severe that this cannot be satisfactorily achieved, even with supplementary aids and services. If the  
979 placement is in another building, the appropriate educational placement will be as close to the  
980 student's home as reasonably possible.

981  
982 Within the nonacademic setting, students will be provided nonacademic and extracurricular activities  
983 with non-disabled students. Opportunities for participate include which includes counseling services,  
984 athletics, transportation, health services, recreational activities, clubs, and any other opportunities  
985 developed. Limits on nonparticipation or conditions of participation must be designated in the IEP.

986  
987 PCM will also make opportunities available for students eligible for special education to participate with  
988 non-disabled students in PCM's art, music, computer, and home economics opportunities. Currently all  
989 these opportunities are integrated into the general education classroom. If any opportunities, such as  
990 enrichment or art, are added, IEP students will be eligible to participate unless denoted otherwise in  
991 their IEP.

992  
993 Within PCM, a continuum of alternative placement options exists spanning within a general education  
994 class, self-contained, home-bound, and out-of-PCM provisions. These options are intended to address  
995 the individual needs of students and they are considered according to the following process:

996  
997 The placement of each student with a disability will be determined annually, or sooner if appropriate, by  
998 the IEP team.

999  
1000 The appropriateness of placement options will be based upon various decisions including:

- 1001  
1002 1. Data-based judgments in IEP development;  
1003 2. Judgments (data-based) in determining LRE;  
1004 3. The reasonable probability of the placement option(s) assisting the student to attain annual  
1005 goals and objectives and the quality of services needed; and



4. The consideration of potentially harmful effects upon the student or on the quality of services needed.

Placement options along the continuum must include alternative placement options identified in the definition of special education and make provisions for supplementary services such as resource room or itinerant instruction to be provided in concert with the general education placement.

The procedural safeguard notice used by PCM includes a full explanation of all the procedural safeguards relating to independent educational evaluation, prior written notice, parental consent, access to educational records, discipline procedures for students who are subject to placement in an interim alternative educational setting, state complaint procedures, mediation, the child's placement during pendency of due process proceedings including requirements for disclosure of evidence, due process hearings, civil actions and attorney's fees. Copies of PCM's special education procedural safeguards are available on the PCM website under the PCM Families tab ([www.PullmanCommunityMontessori.org](http://www.PullmanCommunityMontessori.org)). The Director of Specialized Programs is responsible for ensuring that the procedural safeguards are provided and when they are required.

**A. Consent**

PCM will obtain informed, written parental consent before:

1. Conducting an initial evaluation;
2. Providing initial special education and related services to a student; and
3. Conducting a reevaluation if the reevaluation includes administration of additional assessments.

Parental consent is not required to review existing data as part of an evaluation or reevaluation, or to administer a test or other evaluation that is administered to all students unless consent is required of all students' parents.

Informed consent means that the parent or adult student:

1. Has been fully informed of all information that is relevant to the activity for which PCM is asking consent, and that the information is provided in his or her native language or other mode of communication;
2. Understands and agrees in writing to the activity for which consent is sought and the consent describes the activity and lists any records which will be released and to whom; and
3. Understands that the granting of consent is voluntary and may be revoked at any time. If consent is revoked, the revocation does not negate an action that has occurred after the consent was given and before the consent was revoked.



PCM may not use a parent's refusal to consent to one service or activity to deny the parent or child any other service, benefit, or activity of PCM.

If PCM is unable to obtain a parent's consent, PCM may use mediation procedures to obtain a parent's consent or request a due process hearing asking the administrative law judge to override the parent's refusal to consent to an evaluation or reevaluation. PCM may not request a due process hearing to override a parent's refusal to consent to initial special education services. PCM may not use mediation or due process procedures to override a parent's refusal to consent to an evaluation or reevaluation if the student is homeschooled.

**A. Revocation of Consent**

Parents may revoke consent for the continued receipt of special education and related services. If parents revoke consent, the staff member receiving the revocation will forward the revocation to the Director of Specialized Programs.

Upon receipt of the parent's written notice of revocation, the Director of Specialized Programs

1. will provide prior written notice within a reasonable time before PCM stops providing services. The notice will include information about the effect of revocation and will inform the parent of the date PCM will stop providing special education and related services.

Discontinuation of special education and related services in response to the parent's written revocation will not be in violation of FAPE and eliminates PCM's requirement to convene an IEP meeting or develop an IEP. However, PCM does have a continuing Child Find duty, and staff will follow referral procedures if they believe the student should be referred for special education. In addition, parents may request that PCM conduct an initial evaluation for eligibility for special education services after they have revoked consent for continued services.

**A. Prior Written Notice**

Prior written notices are provided to parents when a PCM makes a decision relating to a student's identification, evaluation, placement, or provision of a FAPE. Prior written notices document the decisions made by the IEP teams and evaluation group.

PCM will provide prior written notice to the parent whenever PCM proposes or refuses to initiate or change the identification, evaluation, educational placement, or provision of a FAPE to the student.

The prior written notice will include:

1. A statement that the parents have procedural safeguard protections and if a copy of the procedural safeguards do not accompany the notice, a statement that describes how a copy of the statement of procedural safeguards may be obtained;



2. A description of the action proposed or refused by PCM;
3. An explanation of why PCM proposes or refuses to take the action and a description of other options that PCM considered and the reasons why the options were rejected;
4. A description of any other factors which are relevant to PCM's proposal or refusal;
5. A description of each evaluation procedure, test, record, or report PCM used as a basis for the proposal or refusal; and
6. A description of any evaluation procedures PCM proposes to conduct and sources for parents to contact for assistance in understanding the procedural safeguards provision of this chapter.

Prior written notice and the notice of procedural safeguards must be provided in the native language of the parent or other mode of communication used by the parent unless it is cPCMrlly not feasible to do so. If the native language or other mode of communication of the parent is not a written language, PCM will take steps to ensure that the notice is translated orally or by other means to the parent. This may involve:

1. Arranging for an interpreter if English is not the native language of the parent or if the parent has a hearing impairment; or
2. Providing notice orally if the written language is not a native language.

PCM will document in writing how this information was provided and that the parent understands the content of the notice. The Director of Specialized Programs is responsible for sending prior written notices after evaluation, eligibility, IEP team and placement decisions.

#### **A. Transfer of Educational Rights to an Adult Student**

When a student eligible for special education reaches the age of 18, all educational rights under Part B of the IDEA, previously exercised by the parent, transfer to the student, unless the student is determined incapacitated in a guardianship proceeding or PCM has appointed an educational representative for the student. When the student turns 18, PCM will notify the parent and student that the educational rights have transferred to the student and will send any required notices to both the parent and the adult student. The Director of Specialized Programs is responsible for providing the notice.

At an IEP meeting occurring one year before the student turns 18, PCM will inform the parents and the student that educational rights will transfer to the student and PCM will inform the student about those educational rights. This information will be documented on the IEP.

#### **Appointment of an Educational Representative**

A student over the age of eighteen is presumed to be capable of making educational decisions and able to provide informed consent unless he or she is determined to be "incapacitated" through a legal guardianship proceeding. If a parent, another interested party, or PCM believes that a student over the age of eighteen is unable to provide informed consent or to make educational decisions, and the student does not have a legal guardian, the parent or other interested party may ask PCM to appoint an





educational representative. This determination will only be made if two separate professionals, as defined by WAC 392-172A-05135(5)(a), state that they conducted an examination and interviewed the student, and concluded the student is incapable of providing informed consent. PCM will inform the student of the decision and appoint either, the spouse, the student's parents, another adult or a surrogate educational representative to represent the student. The appointment of the educational representative will continue for one year.

The student or other adult may challenge the certification at any time. If a challenge occurs, PCM will not rely on the education representative, until the representative is recertified.

### **Confidentiality and Records Management**

The Head of School responsible for maintaining the confidentiality of personally identifiable information pertaining to special education and all other students. The Director of Specialized programs will maintain, for public inspection, a current list of the names and positions of PCM employees who have access to personally identifiable information of special education students. PCM will provide parent and adult students, upon request, a list of the types and locations of educational records collected, maintained or used by PCM.

PCM will provide instruction annually to employees collecting or using personally identifiable information on the procedures to protect the confidentiality of personally identifiable information. The training will address the protections outlined in [WAC 392-172A](#), state law and federal regulations implementing the [Family Educational Rights and Privacy Act, FERPA, \(34 CFR Part 99\)](#).

Upon request, the parent(s) of a special education student or adult student will be afforded an opportunity to inspect, review, and challenge all educational records, which will include, but not be limited to, the identification, evaluation, delivery of educational services and provision of FAPE to the student. PCM will comply with the request promptly and before any meeting regarding an IEP or hearing relating to the identification, evaluation, educational placement of the student, or provision of FAPE to the student, including disciplinary proceedings. In any case, PCM will respond no more than 45-calendar days after the date PCM received the request. If an educational record includes information on more than one student, the parents (and/or adult student) may inspect and review only information relating to their child. School personnel receiving requests for educational records will immediately forward the request to the Director of Specialized Programs.

If parents believe that information in an education record is inaccurate or misleading or violates the privacy or rights of the student, they may request that PCM amend the information. Policy and Procedure 3231, Student Records, describes the process and timelines for challenges and hearings regarding student records.

PCM follows the guidelines for records retention outlined in the Secretary of State's *General Records Retention Schedule and Records Management Manual*. PCM will inform parents or adult students when personally identifiable information collected, maintained, or used is no longer needed to provide



educational services to the student. The information will be destroyed at the request of the parent(s) or adult student, or will be provided to the parent or adult student upon their request. However, a permanent record of the student's name, address and phone number, his or her grades, attendance, record, classes attended, grade level completed and year completed will be maintained without time limitation.

Records management is also governed by Policy and Procedure 4040, Public Access to PCM Records.

#### A. **Surrogate Parents**

A surrogate parent is a person appointed by PCM to act on behalf of a student to help ensure the rights of the student to a FAPE when a parent cannot be identified, the whereabouts of the parent are unknown or the student is a ward of the state and does not have a foster parent.

The Director of Specialized Programs is responsible for determining the need for appointment of a surrogate parent.

Natural or adoptive parents, foster parents, persons acting in the place of a parent such as stepparents or relatives, and persons with legal custody or guardianship are considered parents. Students who are homeless and not living with a parent may need a surrogate parent.

The following is guidance for PCM to follow to assist in determining the status of the parent's rights to make educational decisions:

1. In cases where the student is in and out of home care PCM must determine the legal custodial status of the child.
2. Parents who have voluntarily placed their child in state placement still retain legal custody of the child and retain the right to make educational decisions. In this situation the student is not a ward of the state;
3. Parents whose children are placed in group care, pending a determination of "dependency" may still retain rights to make educational decisions unless otherwise ordered by the court;
4. When a disposition order and order of dependency is issued, the state becomes the legal as well as physical custodian of the child. Parents may no longer have the right to make educational decisions during this stage of dependency; and
5. Parents whose parental rights are terminated no longer have the right to make educational decisions on behalf their child.

When a student is placed in foster care the foster parent may act as the parent. When a student is placed in group care, PCM will work with the parents, case-worker(s), foster parents, and others who have knowledge of the student's legal status in order to determine the need for appointment of a surrogate.



When selecting a surrogate parent, PCM will select a person willing to participate in making decisions regarding the student's educational program, including participation in the identification, evaluation, placement of, and provisions of FAPE to the student.

If a student is referred for special education or a student eligible for special education who may require a surrogate parent transfers into PCM, the Director of Specialize Programs will be notified of the potential need. The Director of Specialize Programs will then select a trained individual who can adequately represent the student to ensure that all student rights are observed.

The person selected as a surrogate:

1. Must have no interest that conflicts with the interests of the student he or she represents;
2. Must have knowledge and skills that assure adequate representation of the student; and
3. May not be an employee of a PCM and/or other agency which is involved in the education or care of the student. This includes OSPI, DSHS, PCM employees, and group care providers.

PCM will at a minimum, review with the surrogate parent procedural safeguards, parent involvement in the special education process, parent education publications, and special education regulations. PCM will also cooperate with other PCMs, the ESD, or OSPI in training surrogate parents and in establishing a list of persons willing and able to serve as surrogate parents.

#### A. **Mediation**

The purpose of mediation is to offer both the parent and PCM an alternative to a formal due process hearing. Mediation is voluntary and requires the consent and agreement of both parties. Mediation cannot be used to deny or delay access by a parent to a due process hearing. Mediation is used to resolve disagreements concerning the identification, evaluation, and delivery of educational services, or provision of a FAPE to a special education student. Mediation may be terminated by either party at any time during the process.

The primary participants are the parents, PCM representatives, and mediator. The process is voluntary, confidential, and informal. It is a collaborative process, conducted in a nonadversarial manner. Mediation services will be provided by the Office of Superintendent of Public Instruction (OSPI) at no cost to either party.

PCM's special education director is responsible for coordinating requests for mediation. If a parent requests mediation, notify the director and the director will respond to the parent and coordinate with OSPI's contracted agent. Staff members are reminded that discussions that occur during the mediation process are confidential.





One person designated by PCM to attend the mediation must have authority to bind PCM in any agreement reached through mediation.

### **Due Process Hearing**

Both parents and PCMs may file due process hearings involving the identification, evaluation, placement, or provision of FAPE to a student. IDEA requires that specific information be provided as part of a due process hearing request. The requirements are identified in the notice of procedural safeguards. If parents request information about how to file a due process hearing, PCM will provide the parent with a due process hearing request that contains the required information. Due process hearing request forms are available at the PCM main office or on the OSPI Special Education website.

If any staff receives a request for a due process hearing, a copy of the request should be immediately forwarded to the Director of Specialize Programs. If the parent has not filed the request for hearing with the Washington State Office of Administrative Hearings (OAH), PCM will forward the parent's request to OAH. PCM may not delay or deny a parent's due process hearing request. Parents are entitled to a copy of the notice of procedural safeguards if this is the first due process hearing in a school year. PCM Director of Specialized programs is responsible for providing the parents a copy of the procedural safeguards in this situation, and documenting that the safeguards were provided to the parent.

When a parent files a due process hearing, the student remains in the placement and receives the same services in place at the time of the request for hearing, unless the parents and PCM agree to a different placement. The student's status during the pendency of any proceedings does not preclude the IEP team from meeting, as needed or as required, and updating and implementing the student's IEP or services, unless those changes are in dispute. See the discipline section below for placements when a disciplinary action is challenged.

When parents file a request for a due process hearing, the Director of Specialize Programs will immediately schedule a resolution meeting. The meeting must occur within 15 days after a parent files a due process request with PCM and provides a copy of the request to OAH, or, within seven days if the hearing request involves an expedited hearing regarding discipline. The Director of Specialized Programs will determine the appropriate PCM staff that will attend the resolution meeting. PCM will ensure that one of PCM representatives attending the resolution meeting has authority to bind PCM in any resolution agreement. PCM will not bring PCM counsel to a resolution meeting unless the parent is bringing an attorney to the meeting.

Any resolution agreement reached will be documented in writing and is binding on the parties. The document will inform the parent of their right to void the agreement within three business days of signing the agreement.

### **Discipline**

Students eligible for special education services may be disciplined consistent with the disciplinary rules that apply to all students. PCM will determine on a case by case basis whether discipline that is



permitted under [WAC 392-400](#) should occur. However, students eligible for special education services must not be improperly excluded from school for disciplinary reasons that are related to their disability or related to PCM's failure to implement a student's IEP. PCM will take steps to ensure that each employee, contractor, and other agents of PCM responsible for education or care of a student is knowledgeable of special education disciplinary rules.

**A. Removal Up to Ten Days**

The Director of Specialized Programs may order the removal of a special education student from a current placement. PCM need not provide services to a student who is removed from the current placement for ten school days or less in any school year, if services are not provided to a student without disabilities.

**B. Removal for More than Ten Days**

Once a student has been removed from placement for a total of ten school days in the same school year, and if PCM determines that the removal is not a change of placement, PCM must, during subsequent days of removal, provide appropriate services to the extent necessary to enable the student to participate in the general curriculum, although in another setting, and to progress toward meeting the goals set out in the student's IEP the Director of Specialized Programs in consultation with one or more of the student's teachers, will make the determination of such necessary services.

**C. Change in Placement**

A change of placement occurs when an eligible student is:

1. Removed from his or her current placement for more than ten consecutive school days in a school year; or
2. Subjected to a series of removals in a school year that constitute a pattern of removal because: 1) the series of removals total more than ten school days in a year; 2) the student behavior is substantially similar to the student's behavior in previous incidents that resulted in the series of removals; and 3) because of factors such as the length of each removal, the total amount of time a student is removed, and the proximity of the removals to one another.

Whether a pattern of removal constitutes a change in placement is determined on a case-by-case basis by the building Head of School and Director of Specialized Programs and is subject to review through due process and judicial proceedings.

**A. Manifestation Determination**

Within ten school days after the date on which PCM makes a decision to change the student's placement, PCM will conduct a manifestation determination meeting to determine the relationship between the student's disability and the behavior subject to the disciplinary action.

The review of the relationship between a student's disability and the behavior subject to the disciplinary



action will occur at meeting that includes the parent and relevant members of the IEP team who are selected by the parent and PCM. The Director of Specialized Programs is responsible for contacting the parent in order to determine relevant IEP team members and providing notice of the meeting. The team will review all relevant information in the student's file, including the IEP, teacher observations, and information provided by the parent to determine:

1. If the conduct was caused by or had a direct and substantial relationship to the child's disability; or
2. If the conduct in question was the direct result of PCM's failure to implement the student's IEP.

If the team determines that the behavior resulted from any of the above, the behavior must be considered a manifestation of the student's disability.

PCM will take immediate action to remedy the deficiencies, and will:

1. Conduct a functional behavioral assessment (unless already completed) and implement a behavioral intervention plan if one is not already in place; or
2. Review the existing behavioral intervention plan and modify it to address the behavior; and
3. Return the child to the placement from which he or she was removed from unless the parents and PCM agree a change is necessary as part of the behavioral intervention plan, or unless the infraction involves drugs, weapons, or serious bodily injury.

#### A. **Special Circumstances**

School personnel may order a change in placement to an appropriate interim alternative educational setting for the same amount of time that a student without disabilities would be subject to discipline, but for not more than 45 school days, if a special education student:

1. Possesses a "dangerous weapon" or carries such a weapon to school or to a school function;
2. Knowingly possesses or uses "illegal drugs" while at school or a school function;
3. Sells or solicits the sale of a "controlled substance" while at school or a school function; or
4. Inflicts serious bodily injury upon another person while at school or a school function. Serious bodily injury means a substantial risk of death, extreme physical pain, protracted and obvious disfigurement, or protracted loss or impairment of the function of a bodily member, organ, or mental faculty.

Any interim alternative educational setting in which the student is placed is determined by the student's IEP team and will:



1. Be selected so as to enable the student to participate in the general curriculum, although in another setting and to progress toward meeting the goals set out in the student's IEP; and
2. Include services and modifications designed to address the behavior or to prevent the behavior from recurring.

PCM may ask an administrative law judge, or seek injunctive relief through a court having jurisdiction of the parties, to order a change in placement to an appropriate interim alternative educational setting for not more than 45 school days or seek injunctive relief through a court having jurisdiction of the parties when:

1. PCM believes that maintaining the student's current placement is substantially likely to result in injury to the student or others. If the student's IEP team believes that the student may not be maintained in his or her current placement, the IEP team should work with PCM's Director of Specialized Programs.

Unless the parent and PCM agree otherwise, if a parent requests a hearing to challenge either the manifestation determination or the interim alternative educational setting, the student must remain in the interim alternative educational setting pending the decision of the hearing officer or until the expiration of the 45 day period, whichever occurs first.

**A. Basis of Knowledge**

A student who has not been determined eligible for special education services may assert the protections if PCM had knowledge that the student was eligible for special education services before the behavior that precipitated disciplinary action occurred.

PCM is deemed to have knowledge if:

1. The parent expressed concern in writing (or orally if the parent does not know how to write or has a disability that prevents a written statement) to PCM supervisory or administrative personnel or a teacher that the student is in need of special education and related services;
2. The parent requested that the student be evaluated for special education services; or
3. The teacher or other school personnel has expressed specific concern about a pattern of behavior demonstrated by the student to the director of the special education department or to other supervisory staff.

If instituting disciplinary action that would exceed ten days and the principal believes that one or more of these events applies to the student, the principal will notify the special education department to determine the appropriate disciplinary procedures.

PCM is not deemed to have knowledge if, as a result of receiving the information described



above, PCM either:

1. Conducted a special education evaluation of the student and determined that the student was not eligible for services; or
2. The parent of the student has not allowed an evaluation of the child or has refused services.

If PCM is not deemed to have knowledge that a student is a student eligible for special education services, the student may be disciplined as a student without disabilities who engages in comparable behaviors. PCM will conduct an evaluation, which is requested during the time period such a student is subjected to disciplinary measures, in an expedited manner. Until the evaluation is completed, such a student will remain in the educational placement determined by PCM, which depending upon the behavior can include suspension or expulsion.

Notwithstanding the foregoing, PCM may report a crime committed by a student eligible for special education services to appropriate authorities. In the event of such a report, PCM will ensure that copies of the student's special education and disciplinary records are transmitted for consideration by the appropriate authorities to whom the crime is reported, to the extent transmission of the records is permitted by the Family Educational Rights and Privacy Act (FERPA).

#### **Staff Qualifications**

All employees of PCM funded in whole or part with state or federal excess special education funds will meet the standards established by the Professional Educator Standards Board (PESB) and defined in [WAC 392-172A-02090](#).

All employees will hold such credentials, certificates, or permits as are now or hereafter required by the PESB for the particular position of employment and will meet such supplemental standards established by PCM.

Special education and related services must be provided by appropriately qualified staff. Other staff including general education teachers and paraeducators may assist in the provision of special education and related services, provided that the instruction is designed and supervised by special education certificated staff (or early childhood special education certificated staff, deaf education certificated staff, deaf education with American Sign Language proficiency certificated staff, teacher of the visually impaired certificated staff), or for related services by a certificated educational staff associate. Student progress must be monitored and evaluated by special education certificated staff or for related services, a certificated educational staff associate.

In the event a special education teacher does not have a certificate endorsed in special education (or early childhood special education endorsement, deaf education endorsement, deaf education with American Sign Language proficiency endorsement, teacher of the visually impaired endorsement), a PCM may apply for a pre-endorsement waiver through the special education section of the OSPI. To qualify for the special education pre-endorsement waiver, the teacher must meet PESB criteria outlined





in WAC 181-82-110.

If PCM must temporarily assign a classroom teacher without a special education endorsement (or early childhood special education endorsement, deaf education endorsement, deaf education with American Sign Language proficiency endorsement, teacher of the visually impaired endorsement) to a special education position, PCM Director of Specialized Programs document in writing that:

- A. PCM is unable to recruit a teacher with the proper endorsement who was qualified for the position;
- B. The need for a teacher with such an endorsement could not have been reasonably anticipated and the recruitment of such a classroom teacher at the time of assignment was not reasonably practical; and/or
- C. The reassignment of another teacher within PCM would be unreasonably disruptive to the current assignments of other classroom teachers or would have an adverse effect on the educational program of the students assigned to the other teacher.

If one or more of these criteria can be documented and PCM determines that a teacher has the competencies to be an effective special education teacher and the teacher has completed two hundred forty clock hours (or the equivalent of 24 quarter or 16 semester credits) applicable to one or more Washington state special education teaching certificates (early childhood special education endorsement, deaf education endorsement, deaf education with American Sign Language proficiency endorsement, teacher of the visually impaired endorsement), PCM can assign the teacher to special education in compliance with the process for making out-of-endorsement assignments and reporting them to the state.

Classified staff will present evidence of skills and knowledge necessary to meet the needs of students with disabilities. PCM will provide training to classified staff to meet the state recommended core competencies.

### **Personnel Development**

In order to provide a staff development program to improve the quality of instructional programs, the following procedures will be employed:

1. Special education concerns will be identified through a staff needs assessment completed by administrators, teachers, educational staff associates, program assistants, parents, and volunteers;
2. All personnel who use restraint, restraint devices and/or isolation must be certified and annually trained in the use of such restraint, restraint devices, and/or isolation;
3. In-service training schedules will be developed based upon the results of PCM assessment and in support of needs identified;



4. Training activities will be conducted for regular general and special education staff providing services for students eligible for special education; and
5. Training for classified staff in the state recommended core competencies will occur through summer and school year targeted professional development sessions.

#### **Public Participation**

Any application and any required policies, procedures, evaluations, plans, and reports are readily available to parents and other members of the public through PCM's special education office and the office of the superintendent. A notice regarding the availability of such documents will be placed on PCM's Web site.

DRAFT



**Procedure for Policy #4040  
Public Access to LEA Records Procedure**

**Adopted – x**

**Last Revised – WSSDA: 10/2019**

**Prior Revised Dates – WSSDA: 08/1998; 10/2005; 12/2011; 04/2015; 12/2015; 07/2017**

**Purpose of these Procedures and General Principles**

These procedures have been established by the Head of School and published pursuant to Board Policy 4040 and RCW 42.56.040 to explain the process for public access to LEA records and to provide guidance in how the LEA will respond to such requests.

School LEA records relating to the conduct of operations and functions of the LEA that have been prepared, owned, used, or retained by the LEA in any format are, in fact, public records to which members of the public may request access consistent with this procedure.

When processing such requests, the LEA will provide the fullest assistance to the requestor and provide a response in the timeliest manner possible.

**LEA Public Records Officer**

**Public Records Officer**

For the most timely and efficient response, requests for school LEA records should be directed in writing to the Public Records Officer listed below, whose responsibilities include serving as a point of contact for members of the public in this process and overseeing the LEA's compliance with the Washington Public Records Act, Chapter 42.56 RCW, and Policy 4040.

The current Public Records Officer of the LEA may be reached at the LEA's Central Administrative Building as follows:

Laylah Sullivan  
Head of School  
115 NW State Ste STE 212  
Pullman WA, 99163  
Phone: 509-336-5909  
Email: [PCMpublicrecords@myPCM.org](mailto:PCMpublicrecords@myPCM.org)

Information regarding contacting the Public Records Officer is also available at the LEA website at [www.PullmanCommunityMontessori.org](http://www.PullmanCommunityMontessori.org)

**Public Records Officer Training**

Consistent with state law, the Public Records Officer shall complete trainings related to the Washington Public Records Act and public records retention no later than ninety (90) days after assuming the responsibilities of the Public Records Officer. After the initial training(s), the Public Records Officer must





complete refresher training at intervals of no more than four years as long as they remains the LEA's Public Records Officer. Training must address particular issues related to the retention, production, and disclosure of electronic documents, including updating and improving technology information services.

### **Availability of Public Records**

#### **Hours for Inspection**

Public records are available for inspection and copying during normal business hours of the LEA, Monday through Friday, 8:00 a.m. to 4:00 p.m., during the school year, and 8:00 a.m. to 3:00 p.m., on days school is not in session, excluding legal holidays. Records must be inspected at the offices of the LEA.

#### **Organization of Records**

The LEA will maintain its records in a reasonable, organized manner and take reasonable actions to protect records from damage and disorganization. A requestor shall not take LEA records from LEA offices without the permission of the Public Records Officer or designee. During the inspection of records, a LEA employee will typically be present to protect records from damage or disorganization.

The LEA will also maintain a log of public records requests that have been submitted to and processed by the LEA. This log shall include, but not be limited to, the following information for each request: The identity of the requestor if provided, the date the request was received, the text of the original request, a description of the records produced in response to the request, a description of the records redacted or withheld and the reasons therefor, and the date of the final disposition of the request.

#### **Information Online**

A variety of records and information are available on the LEA website at [www.PullmanCommunityMontessori.org](http://www.PullmanCommunityMontessori.org) are encouraged to view the documents available on the website prior to submitting a records request.

### **Making a Request for Public Records**

#### **Request to Public Records Officer**

Any person wishing to inspect or copy public records of the LEA shall make the request in person during the LEA's normal office hours, or in writing by letter or email addressed to the Public Records Officer and including the following information:

- Name, address, telephone number, and email address of requestor;
- Identification of the public records adequate for the Public Records Officer or designee to locate the records; and
- The date the request is submitted to the LEA.

The LEA recommends using its Public Records Request Form when submitting a request for records. This form is available for use by requestors at the LEA's central office and online at [www.PullmanCommunityMontessori.org](http://www.PullmanCommunityMontessori.org)



85

**86 Identifiable Records**

87 A request under the Washington Public Records Act, Chapter 42.56 RCW and LEA Policy 4040 must seek  
88 an identifiable record or identifiable records. A request for all or substantially all of the records  
89 prepared, owned, used, or retained by the LEA is not a valid request for identifiable records. General  
90 requests for information from the LEA that do not seek identifiable records are also not covered by  
91 Policy 4040. A request for all records discussing a particular topic or containing a particular keyword or  
92 name will not be considered a request for all of the LEA's records.

93

**94 Requesting Electronic Records**

95 The process for requesting electronic public records is the same as for requesting paper public records.  
96 However, to assist the LEA in responding to a request for electronic records, a requestor should provide  
97 specific search terms that will allow the Public Records Officer or designee to locate and assemble  
98 identifiable records responsive to the request.

99

**100 Creating New Records**

101 The LEA is not obligated by law to create a new record to satisfy a records request for information. The  
102 LEA may choose to create a record depending on the nature of the request and the convenience of  
103 providing the information in a new document, such as when data from multiple locations is requested  
104 and can be more easily combined into a single new record.

105

**106 Copies of Records**

107 If the requestor wishes to have copies of the records made instead of inspecting them, he or she shall  
108 make this clear in the request and make arrangements to pay for copies of the records or a deposit.

109

**110 Requests Not in Writing**

111 The Public Records Officer or designee may accept informal requests for public records by telephone or  
112 in person. To avoid any confusion or misunderstanding, however, requestors should be mindful that a  
113 request reduced to writing is always the preferred method. If the Public Records Officer or designee  
114 receives a request by telephone or in person, the Public Records Officer will confirm his or her  
115 understanding of the request with the requestor in writing.

116

**117 Processing of Public Records Requests****118 Order of Processing Requests**

119 The LEA will typically process requests in the order received. However, requests may also be processed  
120 out of order if doing so allows the most requests to be processed in the most efficient manner.

121

**122 Central Review**

123 Records requests not made to the Public Records Officer of the LEA will be forwarded by building level  
124 administrators, program administrators, or other staff receiving the request to the Public Records  
125 Officer for processing.

126

**Five-Day Response**

Within five (5) business days of receipt of a request, the Public Records Officer will do one or more of the following:

1. Provide copies of the record(s) requested or make the record available for inspection—or, in the alternative, provide an internet address and link to the LEA's website where the specific record can be accessed (provided that the requestor has not notified the LEA that he or she cannot access the records through the internet); or
2. Acknowledge that the LEA has received the request and provide a reasonable estimate of the time it will require to fully respond; or
3. Acknowledge that the LEA has received the request, and ask the requestor to provide clarification for a request that is unclear, while providing to the greatest extent possible a reasonable estimate of the time the LEA will require to respond to the request if it is not clarified; or
4. Deny the request (although no request will be denied solely on the basis that the request is overbroad).

If the requestor fails to respond to the LEA's request for clarification within 30 days and the entire request is unclear, the LEA may close the request and not further respond to it. If the requestor fails to respond to the LEA's request for clarification within 30 days, and part of the request is unclear, the LEA will respond to the portion of the request that is clear and may close the remainder of the request. In unusual circumstances, the LEA may also seek a court order enjoining disclosure pursuant to law.

The LEA may deny a bot request that is one of multiple requests from the requestor within a twenty-four hour period if the LEA establishes that responding to the multiple bot requests would cause excessive interference with the LEA's other essential functions. The LEA may deem a request to be a bot request when the LEA reasonably believes the request was automatically generated by a computer program or script.

If the LEA does not respond in writing within five business days of receipt of the request for disclosure, the requestor should contact the Public Records Officer to determine the reason for the failure to respond.

**Purpose of Request**

The LEA may inquire into the purpose for which a record is requested and may use the answer to aid in gathering responsive records and determining whether the public has a legitimate interest in obtaining the information. However, a requester is not required to provide a purpose and the LEA may not decline to furnish the records solely because the requester refuses to furnish a purpose for the request.

**Protecting Rights of Others**

In the event that the requested records contain information that may affect rights of others and may be arguably exempt from disclosure, the Public Records Officer may, prior to providing the records, give notice to such others. The notice may make it possible for the others to contact the requestor and ask



him or her to revise the request, or, if necessary, seek a court order to prevent or limit the disclosure. The notice to the affected persons may also include a copy of the request.

### **Records Exempt from Disclosure**

Some records are exempt from disclosure, in whole or in part, under a specific exemption contained in chapter 42.56 RCW or another statute which exempts or prohibits disclosure of specific information or records.

If the LEA believes that a record is exempt from disclosure and should be withheld, the Public Records Officer will state in writing the specific exemption (and statutory section) which applies and provide a brief explanation of how the exemption applies to the record being withheld or redacted. This exemption and explanation will be provided to the requestor in a withholding index or log.

If only a portion of a record is exempt from disclosure, but the remainder is not exempt, the Public Records Officer will redact the exempt portions, provide the nonexempt portions, and indicate to the requestor why portions of the record are being redacted in the withholding index or log.

### **List of Laws Exempting or Prohibiting Disclosure**

Pursuant to RCW 42.56.070 (2), these rules contain a list of laws—other than those specifically listed in the Washington Public Records Act, Chapter 42.56 RCW—which may exempt disclosure of certain public records or portions of records. The LEA has identified the following laws:

- The Family Educational and Privacy Rights Act (FERPA), 20 USC § 1232g (regarding student educational records);
- Washington State Student Education Records Law, RCW 28A.605.030;
- The Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1400 et. seq. and 34 C.F.R. Part 300 (protecting the confidentiality of personally identifying information contained in student records of students with disabilities).
- Privileged communications and attorney work product, such as set forth in Chapter 5.60 RCW;
- Criminal Records Privacy Act (CRPA), Chapter 10.97, RCW;
- Information on students receiving free or reduced lunch, 42 USC § 1758(b)(6);
- Health Insurance Portability and Accountability Act (HIPAA), 45 CFR parts 160-164 (regarding health care information privacy and security);
- Abuse of Children – Protection and Procedure, RCW 26.44.010; RCW 26.44.030(9);
- Notification of Juvenile Offenders, RCW 13.04.155(3);
- Examination question for teachers or pupils prior to the examination, Questions, RCW 28A.635.040;
- Public Law 98-24, Section 527 of the Public Health Services Act, 41 USC § 290dd-2 (confidentiality of alcohol and drug abuse patient records);
- United States and Washington Constitutional provisions including, but not limited to, the right of privacy and freedom of association.



In addition to these exemptions, RCW 42.56.070 (9) prohibits providing access to lists of individuals requested for commercial purposes, and the LEA may not do so unless specifically authorized or directed by law.

The above list is for informational purposes only and is not intended to cover all possible exemptions from the public records law. The above list includes only exemptions which may be in addition to those set forth in Chapter 42.56 RCW. Under appropriate circumstances, the LEA may rely upon other legal exemptions which are not set forth above or contained within the public disclosure law.

### **Inspection of Records**

Consistent with other demands, and without unreasonably disrupting LEA operations, the LEA shall promptly provide for the inspection of nonexempt public records. No member of the public may remove a document from the viewing area without the permission of the Public Records Officer, nor may he or she disassemble or alter any document. The requestor shall indicate which documents he or she wishes the LEA to copy. There is no cost to inspect LEA records.

### **Providing Copies of Non-Electronic Records**

After inspection is complete, the Public Records Officer or designee shall make the requested copies or arrange for copying.

### **Providing Electronic Records**

When a requestor requests records in an electronic format, the Public Records Officer or designee will provide the nonexempt records or portions of such records that are reasonably locatable in an electronic format that is used by the LEA and is generally commercially available, or in a format that is reasonably translatable from the format in which the LEA keeps the record.

### **Providing Records in Installments**

When the request is for a large number of records, the Public Records Officer or designee has the right to provide access for inspection and copying in installments. If, within thirty (30) days, the requestor fails to inspect the entire set of records or one or more of the installments, the Public Records Officer or designee may stop searching for the remaining records and close the request as discussed further below.

### **Completion of Inspection**

When the inspection of the requested records is complete and all requested copies are provided, the Public Records Officer or designee will indicate that the LEA has completed a diligent search for the requested records and made any located nonexempt records available for inspection.

### **Closing Withdrawn or Abandoned Request**

The requestor must claim or review the assembled records within thirty (30) days of the LEA's notification to him or her that the records are available for inspection or copying. The LEA should notify the requestor in writing of this requirement and inform the requestor that he or she should contact the





LEA to make arrangements to claim or review the records. If the requestor or a representative of the requestor fails to claim or review the records within the thirty-day period or make other arrangements, the LEA may close the request and refile the assembled records.

When the requestor either withdraws the request or fails to fulfill his or her obligations to inspect the records or pay the deposit or final payment for the requested copies, the Public Records Officer will close the request and indicate to the requestor that the LEA has closed the request.

#### **Later Discovered Documents**

If, after the LEA has informed the requestor that it has provided all available records, the LEA becomes aware of additional responsive documents existing at the time of the request, it will promptly inform the requestor of the additional documents and provide them on an expedited basis.

### **COSTS OF PROVIDING RECORDS, WAIVER OF COSTS, AND AGREEMENTS REGARDING COSTS**

#### **Cost of Printed Copies and Mailing**

The cost of providing photocopies or printed copies of electronic records is 15 cents per page. Alternatively, if the LEA determines and documents that the fees allowed under this procedure are clearly equal to, or more than, two dollars, the LEA may instead charge a flat fee of two dollars to provide the records. If the LEA charges a flat fee for the first installment, the LEA will not charge an additional flat fee or a per page fee for any subsequent installments. Payment may be made by cash, check, or money order payable to the LEA.

The LEA may also charge actual costs of mailing, including the cost of the shipping container or envelope.

The Public Records Officer or designee may require the payment of the remainder of the copying costs before providing all the records, or the payment of the costs of copying an installment before providing that installment.

If requested, the LEA will provide a summary of the applicable charges before any copies are made. The requestor will be allowed to revise the request in order to reduce the applicable charges.

#### **Customized Service Charge**

A customized service charge may be imposed if the LEA estimates that the request would require the use of information technology expertise to prepare data compilations, or to provide customized electronic access services when such compilations and customized access services are not used by the LEA for other LEA purposes. The customized service charge may reimburse the LEA up to the actual cost of providing the services in this paragraph.

The LEA will not assess a customized service charge unless it has notified the requestor of the customized service charge to be applied to the request, including an explanation of why the customized service charge applies, a description of the specific expertise, and a reasonable estimate cost of the



charge. The notice will also provide the requestor the opportunity to amend his or her request in order to avoid or reduce the cost of a customized service charge.

### **Cost for Electronic Records**

The cost for providing electronic records is as follows:

1. Ten cents per page for public records scanned into an electronic format or for the use of LEA equipment to scan the records;
2. Five cents per each four electronic files or attachment uploaded to email, cloud-based data storage service, or other means of electronic delivery;
3. Ten cents per gigabyte for the transmission of public records in an electronic format or for the use of LEA equipment to send the records electronically; and
4. The actual cost of any digital storage media or device provided by the LEA, the actual cost of any container or envelope used to mail the copies to the requestor, and the actual postage or delivery charge.

The LEA will take reasonable steps to provide the records in the most efficient manner available to the LEA in its normal operations;

Alternatively, if the LEA determines and documents that the fees allowed under this procedure are clearly equal to, or more, than two dollars, the LEA may instead charge a flat fee of two dollars to provide the records. If the LEA charges a flat fee for the first installment, the LEA will not charge an additional flat fee or a per page fee for any subsequent installments.

The Public Records Officer or designee may also require the payment of the remainder of the copying costs before providing all the records, or the payment of the costs of copying an installment before providing that installment.

If requested, the LEA will provide a summary of the applicable charges before charges are imposed under this procedure. The requestor will be allowed to revise the request in order to reduce the applicable charges.

The LEA will not impose copying charges for access to or downloading of records that the LEA routinely posts on its website prior to the receipt of a request, unless the requestor has specifically requested that the LEA provide copies of such records through other means.

### **Deposits**

Before beginning to make the copies, the Public Records Officer or designee may require a deposit of up to ten percent of the estimated costs of copying all the records selected by the requestor, including the cost of a customized service charge according to the provision above.

### **Waiver**





The Public Records Officer may waive any charge assessed for a request. On behalf of the LEA, the Public Records Officer may also enter into any contract, memorandum of understanding, or other agreement with a requestor that provides an alternative fee arrangement to the charges authorized in this Procedure, or in response to a voluminous or frequently occurring request.

#### **Review of Denials of Public Records**

##### **Petition for Internal Administrative Review of Denial of Access**

Any person who objects to the initial denial or partial denial of a records request may petition in writing (including email) to the Public Records Officer for a review of that decision. The petition shall include a copy of or reasonably identify the written statement by the Public Records Officer or designee denying the request.

##### **Consideration of Petition for Review**

The Public Records Officer shall promptly provide the petition and any other relevant information to the PCM Board of Trustees Chair. That person will immediately consider the petition and either affirm or reverse the denial within two business days following the LEA's receipt of the petition, or within such other time, which the LEA and the requestor mutually agree.

##### **Reporting Costs of Producing Public Records**

The LEA will provide the information specified in RCW Chapter 40.14 to the Joint Legislative Audit and Review Committee as required by law.

# Coversheet

## Board Member Resignations

<b>Section:</b>	V. Action Items
<b>Item:</b>	C. Board Member Resignations
<b>Purpose:</b>	Vote
<b>Submitted by:</b>	
<b>Related Material:</b>	Bev Resignation 9-12-2022.pdf Melisa Resignation 9-19-2022.pdf

9/12/2022

Dear John,

As of 8/31/2022, I will need to resign from the board, as I have accepted a temporary position as a substitute teacher for Pullman Community Montessori. This position will last through the end of October 2022.

Once I am no longer needed to fill this temporary opening, I would very much like to be considered once again for a board position.

On 9/12/2022, I will open the committee meeting for the Leadership Support and Evaluation Committee as a committee member, not as a board member. The work completed so far by the LSEC was completed before I began my teaching position as PCM. At the meeting today I will pass on the responsibilities of completing the memo and reporting to the full board to you, John Cassleman, to avoid any conflict of interest.

I will resume my membership in LSEC as an active participant if and when I am reinstated as a board member.

Thank you for your time. If you have any questions, please let me know.

Sincerely,

Bev Wolff

Sep 19, 2022

Hi John,

[REDACTED] I came to the same, bittersweet conclusion that regardless of my strong desire and passion to serve on the board, with everything else I have going on in my personal life, now is not the time.

Please accept this email as my official resignation from the board. I hope that I can be of service through volunteerism for now, and perhaps more deeply in the future.

I wish you and the school nothing but the best.

Sincerely,

Melisa

# Coversheet

## Approve SY2022-23 Board of Trustees Goals

<b>Section:</b>	V. Action Items
<b>Item:</b>	E. Approve SY2022-23 Board of Trustees Goals
<b>Purpose:</b>	Vote
<b>Submitted by:</b>	
<b>Related Material:</b>	BOT_Objectives2022-23.pdf

# PCM Board of Trustees Vision SY 22/23

## Finances

*PCM is moving towards financial stability and independence.*

### Success will look like...

- Board members understand the established benchmarks for assessing school health and work towards independence.
  - Board finance assessment, monitoring, and support process is created and taught to board members
  - PCM has a plan to reach financial stability by year 5 as outlined by the budget projection workbook.
  - Finance Committee brings the 5 year budget projection to the Board for bottle neck problem solving
- Establish a Development Committee
  - Funds needed to meet 2023 Budget Private funds have been raised
  - DC begins to implement the ["Fund Development Plan"](#) to raise private funds

### End of Year Metrics

1. PCM is in 100% compliance with all financial compliance metrics set forth by the commission.
2. Development Committee consists of a minimum of 4 members and they meet monthly.
3. \$110k of private funds is raised by March 2023.
4. Formal plan is created in alignment with the 5-year budget projection workbook by the end of the school year and all board members are aware of this plan.

## Board Roles and Systems

*The board has established systems and processes that allows the board to make informed decisions in the best interest of PCM.*

### Success will look like...

- Continuous and strategic recruitment of committee and board members.
- Committees are established and have set goals and priorities for the year.
  - Committee goals are entered and tracked on BoT
- The board has clear engagement expectations and systems of accountability.

- Revisit board agendas/processes
- Opportunity for committee chairs to share their committee goals and space for problem solving in agenda
- Board Tasks check-ins added to agenda
- Strategic board calendar
- Decision making protocol
- Board has a deep understanding of governance versus management

### End of Year Metrics

1. Committees are established, maintained, and sustainable with at least 4 active members each.
  - a. Governance
  - b. Development
  - c. Educational Excellence
  - d. Leadership Support and Evaluation
  - e. Financial
2. 90% of Committee Goals are met on time as tracked by BoT.
3. 90% of Board Tasks are met on time as tracked by BoT.

## Culture of Community and Transparency

*A strong and inclusive community is at the heart of PCM's mission and vision; transparency is key to building trust in that community.*

### Success will look like...

- The Board develops systems and plans for engaging in the larger Pullman and charter community
  - Board engages with legislative work
  - Board connects with community members on Board Asset Map
- Families and staff have clear and accessible systems of engagement with the board
  - Board receives updates and input from 3 councils, once established
  - Families and staff feel supported, listened to, and empowered.
  - Systems of engagement with the board, outside of board meetings, is created.



### End of Year Metrics

1. At least 2 legislators or local government representatives are contacted by PCM board members and asked to tour the school.
2. Each board member reaches out to a minimum of 2 community members on the Board Asset MAP per year.
3. 80% of PCM families indicate they understand the role of the PCM Board in the operation of PCM and indicate they understand how to connect with the PCM Board.
4. On the Panorama survey 90% of PCM families, staff, and students feel they have voice and that they are listened to.
5. A minimum of 2 events are held annually by the board to meet and get to know the community.

# Coversheet

## 2022-23 School Specific Goals

<b>Section:</b>	V. Action Items
<b>Item:</b>	F. 2022-23 School Specific Goals
<b>Purpose:</b>	Vote
<b>Submitted by:</b>	
<b>Related Material:</b>	PCM 2022-23 School Specific Goals (Proposed).docx

## School-Specific Goals - Academic

This form is intended to launch the individual tailoring of the Commission *Performance Framework* for each school. As part of our goal to develop a *Performance Framework* that builds upon the evaluation lens utilized by the state, we believe each school's framework should contain measures that are representative of your individual program. Applicable Legislation: [WAC 108-30-030](#). Please incorporate your school-specific goals on this form. For any questions, please contact Leslie Hayden, at [Leslie.Hayden@k12.wa.us](mailto:Leslie.Hayden@k12.wa.us) or 360-725-5511.

Academic School Specific Goal (Indicator 4 of Academic Performance Framework – 15% of tiered rating)	
School Mission	To prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community.
School Vision	To serve as an instrument of change, helping to progress our education system to better meet the needs of students, families, and educators.
School Education Program Terms (Attachment 4 of Charter Contract)	<ol style="list-style-type: none"> <li>1. Developmentally appropriate age-grouped classrooms</li> <li>2. Self-directed learning environment</li> <li>3. Learning through action and community</li> </ol>
Student Profile – What make a student who matriculates from your program unique? Should be tied to Education Program Terms (attachment 4)	Students who matriculate from PCM to 10 <sup>th</sup> grade possess strong executive functioning and social-emotional skills and are academically in step or in advance of their similar aged peers. PCM students can set goals, work and plan independently, and are capable of reflecting on and revising plans when needed. Students are also familiar with their community and the change they can affect within it. Gaps based on demographics have been eliminated.
Academic Program Support Area Need – As determined through data review	<p>PCM is committed to ensuring each student makes realistic growth based on where they are and where they are targeted to be each year. MAP data for retained students from 2021-22 school year shows need for focus on Math and ELA. The Math focus required is predominantly around common language and how questions may be asked on a standardized assessment. Local state report card assessment data from 2018-19 reveals a need to focus on both Math and ELA. This need has been more exacerbated by COVID.</p> <p>MAP will be PCM's tool of choice to establish a baseline and measure growth throughout the year. MAP will be used to establish a baseline for all new students and determine where returning students come back from after summer (2022-23, 1<sup>st</sup>-6<sup>th</sup> grade). MAP (fluency) will also be used to identify students with Dyslexia indicators.</p> <p>Students who score "Lo" or "LoAvg" will receive more targeted and intensive supports driven by the areas of need identified on their individualized reports combined with other formative assessments.</p>
Goal/ Lagging Indicator <i>What is the intended outcome?</i>	Of the students who score Lo and LoAvg on their MAPS ELA and Math in Fall 2022, half of them will achieve their MAP Projected Growth Goals by the Spring 2023 testing session.

<p><b>Goal Connection</b>  <i>Describe how the goal captures the school mission/vision/educational program terms/student profile.</i></p>	<p>NWEA MAP Growth in ELA and math will allow us to track student progress in key academic areas necessary to succeed in school and life. Tracking progress in this way is essential to achieve our mission and ensure any gaps are closed during a student's progression from Grades K-9<sup>th</sup> grade. Additionally, as there is no state assessment for students in Grades 1<sup>st</sup>-2<sup>nd</sup>, MAP provides a necessary growth tracking tool.</p>		
<p><b>Leading Indicator:</b>            What actionable steps (ex. interventions will be put in place to directly influence the outcome of the goal? How will you provide supports to staff to allow authentic implementation of the interventions?</p>	<p>Once students complete the benchmark assessment in the fall, our Head of School and Montessori Coach - Director of Academic Programs will meet to discuss the results and plan out interventions for students with Guides and their instructional assistants.</p> <p>PCM uses the vast breadth of Montessori math materials to find the right fit to stimulate students' interest and support growth. PCM uses Montessori materials and Heggerty at the earlier grade levels, to support ELA growth. Lexia will also be used as a grade level intervention.</p>		
<p><b>Metrics</b>  <i>How will you measure your goal?</i></p>	<p>Percentage of students who hit their growth goal for their MAP assessment in ELA and Math between fall and spring assessments.</p>		
<p><b>Targets</b>  <i>How will you know if you are successful? Set the cut-points for each target category and give the rationale for each cut-point. look at past trends, current performance, and comparative data to set target cut-points.</i></p>	Category	Target	Rationale for the Target
	Exceeds	>60% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2023 MAP assessment	This would mean a majority of our students met their growth target
	Meets	50-59% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2023 MAP assessment	This would meet the outcome of at least 50% of our students meeting their growth targets
	Does Not Meet	35-49% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2023 MAP assessment	This would indicate that our interventions were unsuccessful for a majority of our students
	Falls Far Below	<35% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2023 MAP assessment	This would indicate that our interventions are not correlated with the gaps identified by MAP and did not have a noticeable impact on most students' understanding of grade level standards

<p>Assessment Details, Data Collection and Verification</p> <p><i>Explain why the chosen means of assessment and criteria for success are appropriate for measuring performance toward the goal. How often will the school collect data for this goal and how will the school share results with key stakeholders (i.e., Commission, Board, etc.)? How will data be verified if audited?</i></p>	<p><b>Why:</b> This measurement tool is unique as it provides a measure of growth as well as data showing how PCM students are performing compared to a nationally normed set of students from across the country.</p> <p><b>Frequency:</b> PCM students in Grades 1<sup>st</sup> – 9 (2022-23 K-6<sup>th</sup>) will take the NWEA MAP Growth assessment three times each academic year (fall, winter, spring) to evaluate growth goals and growth over time.</p> <p><b>Data-sharing &amp; Verification:</b> Data will be shared with Guides during data dives to advise individualized work plans and make mid-year course corrections. The data will be shared with parents during family-teacher conferences where Guides will discuss the alignment with the Montessori works and observation they are making in class. Families will be provided ideas on how to support and partner with the school to support their child's growth. Progress toward goals will be reported to the PCM board of trustees on a trimester basis. Data will be provided to the Washington State Charter School Commission as required, published in our August monthly newsletter, and provided for the board of trustees annual meeting. This report will provide plans for school-wide growth to ensure all students are experiencing adequate growth. Data can be verified through school records associated with each category.</p>
<p>Results Summary</p> <p><i>Provide a brief summary of results and evidence of assessment.</i></p>	<p>NWEA MAP is a nationally normed progress and proficiency evaluation tool that is well known and established across the nation. NWEA MAP score reports can be found at <a href="https://www.nwea.org/">https://www.nwea.org/</a></p>

## Academic - Lead Indicator Progress Monitoring Template

<b>School Name:</b> Pullman Community Montessori					
<b>Academic School Specific Goal:</b> Of the students who score Lo or LoAvg on their MAPS assessment in Fall 2022, half of them will achieve their MAP Projected Growth Goals by the Spring 2023 testing session.					
<b>Needs Area Identified:</b> MAP data for retained students from 2021-22 school year shows need for focus on Math and ELA. The Math focus required is predominantly around common language and how questions may be asked on a standardized assessment. Local state report card assessment data from 2018-19 reveals a need to focus on both Math and ELA.					
<b>Leading Indicator Focus:</b> Once students complete the benchmark assessment in the fall, our Head of School and Montessori Coach-Director of Academic Programs will meet to discuss the results and plan out interventions for students with Guides and their instructional assistants.  PCM uses the vast breadth of Montessori math materials to find the right fit to stimulate students' interest and support growth. PCM uses Montessori materials and Heggerty at the earlier grade levels, to support ELA growth. Lexia will also be used as a grade level intervention.					
Tasks	Responsible Person(s) Involved	Professional Development/ Resources	Means to Assess Improvement	Timeline	Reporting
Assess all students on MAP	Head of School & Montessori Coach-Director of Academic Programs, classroom teams	MAP online testing platform	N/A	1 <sup>st</sup> – 6 <sup>th</sup> students to take MAP assessment in September 2022	MAP assessment student reports
Meeting to discuss student results	Head of School, Montessori Coach-Director of Academic Programs	MAP purchased PD and support + other charter leaders		Wednesday October 5, devise plan, school wide deep dive November 2nd	Intervention action plan generated, at second meeting touch base on progress and ID if any larger trends are appearing in data
Work with Guides to develop personalized plans/goals	Montessori Coach-Director of Academic Programs, Guides	MC previous experience, Guides expertise, leveraging of key partner input (National Center for Montessori in	Internal assessments rooted in specific lessons and mid-year MAP assessment will help determine growth	October 5 <sup>th</sup> – 19 <sup>th</sup>	

		the Public Sector & Heggerty trainer).	and allow for course corrections.		
Regular check-in on student interventions and progress towards growth goals	Montessori Coach-Director of Academic Programs, Guides		Scheduled, regular check-ins between MC and Guides to ensure students are progressing towards their desired growth goals.	Oct 2021-May 2022	Tracking tool (to be developed by MC and Guides)  Share general progress with the Academic Excellence Committee
Interim MAP Assessment	Montessori Coach-Director of Academic Programs, classroom teams	MAP online testing platform	N/A	1 <sup>st</sup> – 6 <sup>th</sup> students to take MAP interim assessment in February 2023	MAP assessment student reports shared with Staff. Course corrections planned.
Spring MAP Assessment	Montessori Coach-Director of Academic Programs, classroom teams	MAP online testing platform	Students will complete the spring benchmark assessment to measure growth between assessment cycles	1 <sup>st</sup> – 6 <sup>th</sup> students to take spring MAP assessment in February 2023	“Summative” student results reported to staff and families. Goes into goal planning for next year and any program adjustments if any are needed.
Development of program goals for Fall 2023	Head of School, Montessori Coach-Director of Academic Programs, PCM staff		PCM Leadership Team will convene to discuss Winter to Spring MAP growth and build program goals for movement into the 2023-24 school year.	May/June 2022	Goals will be shared with the Academic Excellence Committee, contributes to Board goal setting in August at Board Retreat.



## School-Specific Goal – Organizational

This form is intended to launch the individual tailoring of the Commission *Performance Framework* for each school. As part of our goal to develop a *Performance Framework* that builds upon the evaluation lens utilized by the state, we believe each school's framework should contain measures that are representative of your individual program. Applicable Legislation: [WAC 108-30-030](#). Please incorporate your school-specific goals on this form. For any questions, please contact Leslie Hayden, at [Leslie.Hayden@k12.wa.us](mailto:Leslie.Hayden@k12.wa.us) or 360-725-5511.

Organizational School Specific Goal (Indicator 6 of Organizational Performance Framework)	
School Mission	To prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community.
School Vision	To serve as an instrument of change, helping to progress our education system to better meet the needs of students, families, and educators.
School Education Program Terms (Attachment 4 of Charter Contract)	<ol style="list-style-type: none"> <li>1. Developmentally appropriate age-grouped classrooms</li> <li>2. Self-directed learning environment</li> <li>3. Learning through action and community</li> </ol>
Student Profile – What make a student who matriculates from your program unique? Should be tied to Education Program Terms (attachment 4)	Students who matriculate from PCM to 10 <sup>th</sup> grade possess strong executive functioning and social-emotional skills and are academically in step or in advance of their similar aged peers. PCM students can set goals, work and plan independently, and are capable of reflecting on and revising plans when needed. Students are also familiar with their community and the change they can affect within it. Gaps based on demographics have been eliminated.
Organization Program Support Area Need – As determined through data review	PCM is a new PUBLIC Montessori charter school. The combination of being public and Montessori presents key features that need to be monitored using nationally recognized public Montessori metrics to ensure quality and fidelity. Without appropriate support, public Montessori effectiveness and performance can be impacted by compromising the curriculum, schedule, staffing structure, and personalized student approach. PCM is dedicated to meeting the needs of all learners and building strong community, within and outside our facility, but to do so we need to adhere to the high-fidelity public Montessori metrics.
Goal/ Lagging Indicator <i>What is the intended outcome?</i>	Pullman Community Montessori will score a “meets” or “exceeds” on each domain of the Essential Elements for Montessori in the Public Sector Rubric (EER) per an annual assessment.
Goal Connection <i>Describe how the goal captures the school mission/vision/student profile/educational program terms.</i>	Evidence indicates that a high-quality, high-fidelity public Montessori education can successfully close achievement gaps, while realizing appreciable growth in non-academic areas of executive functioning and social-emotional development. To that end, EER will serve to help PCM stay mission aligned and deliver a nationally aligned Public Montessori program with consistent quality and fidelity.

<p>Leading Indicator:</p> <p>What actionable steps (ex. interventions) will be put in place to directly influence the outcome of the goal? How will you provide supports to staff to allow authentic implementation of the interventions?</p>	<p>EER is based on 25 standards across five domains –</p> <ol style="list-style-type: none"> <li>1. Adults,</li> <li>2. Montessori Learning Environment,</li> <li>3. Family Engagement,</li> <li>4. Leadership and Organizational Development,</li> <li>5. Assessment.</li> </ol> <p>EER will be reported on trimesterly to the PCM Board of Trustees and shared with the NCMPS regional coach. Data relevant to each domain will be contributed by PCM Admin. Progress and results will also be shared with staff.</p> <p>The potential intervention used, if necessary, will depend on the category of need. A school council, board committee, or administrator may lead the intervention depending on category.</p> <p>This 2022-23 EER will build upon the 2021-22 base-line EER. Progress will guide the 2023-24 school wide goals.</p>		
<p>Metrics</p> <p><i>How will you measure your goal?</i></p>	<p>The assessment will be performed by PCM admin and informed by the schools contracted NCMPS school coach. The rubric is based on 25 standards across five domains -- Adults, Environment, Family Engagement, Leadership and Organizational Development, and Assessment. The rubric articulates set criteria across a four-point scale from Exemplary to Unsatisfactory. We will assign numerical values to each item in order to improve communication through reports.</p>		
<p>Targets</p> <p><i>How will you know if you are successful? Set the cut-points for each target category and give the rationale for each cut-point. look at past trends, current performance, and comparative data to set target cut-points.</i></p>	<p>Category</p>	<p>Target</p>	<p>Rationale for the Target</p>
	<p>Meets (Meets Standard)</p>	<p>Average score of 3 or more in all 5 domains with no scores of 1.</p>	<p>Schools who earn Meets Standard on most standards and Moving Towards Standard on a few, are performing within satisfactory range.</p>
	<p>Does Not Meet (Moving Towards Standard)</p>	<p>Average score of 2 or less in all 5 domains or a score of 1 in any.</p>	<p>Schools who earn Meets Standard on a few standards and Moving Towards Standard on many standards within a domain are performing below expectations.</p>
	<p>Please refer to the <a href="#">NCMPS EER results from the 2021-22 SY</a> for the baseline assessment.</p>		

<p>Assessment Details, Data Collection and Verification</p> <p><i>Explain why the chosen means of assessment and criteria for success are appropriate for measuring performance toward the goal. How often will the school collect data for this goal and how will the school share results with key stakeholders (i.e., Commission, Board, etc.)? How will data be verified?</i></p>	<p><b>Why:</b> EER was created through the collaboration of major national Montessori organizations over the last 25 years. The tool was then refined and elaborated by the NCMPS and is subject to continuous review by Montessori experts as well as school operators. The EER articulates nationally recognized standards of Montessori fidelity, with detailed focus on the policies and practices necessary to sustain public Montessori programs over the long term.</p> <p><b>Frequency:</b> Data will be collected on a cadence that meets the needs of the specific category and progress will be reported each trimester. <b>Data-sharing &amp; Verification:</b> Progress toward goals will be reported to the PCM Board of Trustees. Data will be provided to the Washington State Charter School Commission as required and published in our August newsletter. This report will provide plans for school-wide growth on any goals that did not meet or exceed standards. Data can be verified through school records associated with each category.</p>
<p>Results Summary</p> <p><i>Provide a brief summary of results and evidence of assessment.</i></p>	

## Organization - Lead Indicator Progress Monitoring Template

<b>School Name:</b> Pullman Community Montessori					
<b>Organization School Specific Goal:</b> Pullman Community Montessori will score a “meets” or “exceeds” on each domain of the Essential Elements for Montessori in the Public Sector Rubric (EER) per an annual assessment.					
<b>Needs Area Identified:</b> PCM is a new PUBLIC Montessori charter school. The combination of being public and Montessori presents key features that need to be monitored using nationally recognized public Montessori metrics to ensure quality and fidelity. Without appropriate support, public Montessori effectiveness and performance can be impacted by compromising the curriculum, schedule, staffing structure, and personalized student approach. PCM is dedicated to meeting the needs of all learners and building strong community, within and outside our facility, but to do so we need to adhere to the high-fidelity public Montessori metrics.					
<b>Leading Indicator Focus:</b> EER is based on 25 standards across five domains – <ol style="list-style-type: none"> <li>1. Adults,</li> <li>2. Environment,</li> <li>3. Leadership and Organizational Development,</li> <li>4. Family Engagement, and</li> <li>5. Assessment.</li> </ol> <p>EER will be reported on each trimester to the PCM Board of Trustees and shared with the NCMPS regional coach. Data relevant to each domain will be contributed by PCM Admin. Progress and results will also be shared with staff.</p> <p>The potential intervention used, if necessary, will depend on the category affected. A school council, board committee, or administrator may lead the intervention depending on category.</p> <p>This EER will serve as a baseline and will be reflected on by PCM and NCMPS to establish goals for the 2023-24 school year.</p>					
Tasks	Responsible Person(s) Involved	Professional Development/ Resources	Means to Assess Improvement	Timeline	Reporting

Report and plan based on previous EER with respective committees and PCM admin	Head of School, Montessori Coach - Director of Academic Programs	Targeted support from NCMPs	Relevant data will indicate if there are particular areas PCM is falling short in. PCM Leadership Team goals will be set around this data.	June - August	Respective committees & regional NCMPs coach
Report final assessment to full PCM Board of Trustees	Head of School, Montessori Coach - Director of Academic Programs	Support in calibrating and interpreting from NCMPs	The Final report and Leadership Team goals will be shared with the board to evaluate how the data should guide broader school-wide board goals.	August Board Retreat	Board of Trustees
Progress update and plan with respective committees, Leadership Team, and Board (round 1)	Head of School, Montessori Coach - Director of Academic Programs	Targeted support from NCMPs	Relevant data will be added or updated. Updated data may show growth or areas of focus. Goals may be revised or set around this data.	November-December	Respective committees & regional NCMPs coach
Progress update and plan with respective committees, Leadership Team, and Board (round 1)	Head of School, Montessori Coach - Director of Academic Programs	Targeted support from NCMPs	Relevant data will be added or updated. Updated data may show growth or areas of focus. Goals may be revised or set around this data.	March-April	Respective committees & regional NCMPs coach
End of year Audit	Head of School, Montessori Coach - Director of Academic Programs, advised by NCMPs school coach	NCMPs	The full EER assessment will be completed, and the Leadership Team will reflect and plan for the next school year	June to July	PCM Leadership Team & regional NCMPs coach

Report and plan based on final EER results with respective committees and Board	Head of School, Montessori Coach - Director of Academic Programs	Targeted support from NCMPs	Relevant data will indicate if there are particular areas PCM is falling short in. PCM Leadership Team goals developed in June-August will be shared.	July - August	Respective committees, Board, & regional NCMPs coach
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# Coversheet

## HOS Contract

<b>Section:</b>	V. Action Items
<b>Item:</b>	G. HOS Contract
<b>Purpose:</b>	Vote
<b>Submitted by:</b>	
<b>Related Material:</b>	HOS_2022-23_Employment_Contract__Proposed_.pdf





**PULLMAN  
COMMUNITY  
MONTESSORI**

**PUBLIC  
FREE  
K-9**

## **EMPLOYMENT AGREEMENT**

PCM Head of School  
2022-23 School Year

August 12, 2022

Re: Offer of Employment for 2022-23 School Year

Dear Laylah,

On behalf of the Pullman Community Montessori (PCM) and the PCM Board of Trustees, I am pleased to offer you the Head of School (HOS) position for the 2022-23 School Year. Your employment for the 2022-23 school year will begin on August 15, 2022 at which point you will begin earning an annual salary of \$90,000.00. You will be eligible to participate in PCM's benefit plans, such as health, dental, and vision benefits, as well as retirement to the fullest extent available to other regular, full-time employees, subject to the terms and conditions of those plans. It will be your responsibility to make certain all documents are returned before any specified deadlines. You are also eligible for paid and unpaid leave.

Your service will take place from the aforementioned date until or before August 14, 2023. Your compensation will be paid bimonthly. Pay dates are the 10<sup>th</sup> and 25<sup>th</sup> of each month. The position requires daytime work hours, but occasional evening and weekend availability may be required for special events. This is a salaried position. As such you will receive 15 days annually of paid time off (PTO) and 8 days of paid sick leave. You will also be eligible for paid and unpaid leave, as required by WA state law. You will receive 13 paid holidays: New Year's Day, MLK Day, Presidents' Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Indigenous Peoples Day, Day After Indigenous Peoples, Day before Christmas, Christmas Day, Juneteenth, and a "floating" holiday (either the day after Christmas or the day before or after the 4th of July). More details on benefits can be viewed in the [2022-23 Staff Handbook](#).

Your position is considered "exempt", meaning you are not eligible for overtime earnings, and all earnings are subject to applicable federal, state, and local taxes. You will be subject to and are expected to comply with all PCM policies, procedures, and directives included in the [2022-23 Staff Handbook](#). PCM reserves the right to modify, suspend, or eliminate any policies, procedures, directives, or benefits at any time in its sole discretion.

Laylah, I am excited to welcome you to continue with the PCM team. I look forward continuing to work with you to accomplish our mission "to prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community."

Sincerely,

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

John Cassleman  
Board Chair  
Pullman Community Montessori

Please sign below indicating your acceptance of the terms above.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Laylah Sullivan

# Coversheet

## Summary Report on Academic Measures for SY2021-22

<b>Section:</b>	VI. Other Business
<b>Item:</b>	A. Summary Report on Academic Measures for SY2021-22
<b>Purpose:</b>	FYI
<b>Submitted by:</b>	
<b>Related Material:</b>	PCM School Specific Goals (ACADEMIC RESULTS) (1).pdf First Year.Site.Visit.Report.PCM.09022022 (1).pdf

## School-Specific Goals - Academic

This form is intended to launch the individual tailoring of the Commission *Performance Framework* for each school. As part of our goal to develop a *Performance Framework* that builds upon the evaluation lens utilized by the state, we believe each school's framework should contain measures that are representative of your individual program. Applicable Legislation: [WAC 108-30-030](#) Please incorporate your school-specific goals on this form. For any questions, please contact Leslie Hayden, at [Leslie.Hayden@k12.wa.us](mailto:Leslie.Hayden@k12.wa.us) or 360-725-5511.

Academic School Specific Goal (Indicator 4 of Academic Performance Framework – 15% of tiered rating)	
School Mission	To prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community.
School Vision	To serve as an instrument of change, helping to progress our education system to better meet the needs of students, families, and educators.
School Education Program Terms (Attachment 4 of Charter Contract)	<ol style="list-style-type: none"> <li>1. Developmentally appropriate age-grouped classrooms</li> <li>2. Self-directed learning environment</li> <li>3. Learning through action and community</li> </ol>
Student Profile – What make a student who matriculates from your program unique? Should be tied to Education Program Terms (attachment 4)	Students who matriculate from PCM to 10 <sup>th</sup> grade possess strong executive functioning and social-emotional skills and are academically in step or in advance of their similar aged peers. PCM students can set goals, work and plan independently, and are capable of reflecting on and revising plans when needed. Students are also familiar with their community and the change they can affect within it. Gaps based on demographics have been eliminated.
Academic Program Support Area Need – As determined through data review	<p>PCM is committed to ensuring each student makes realistic growth based on where they are and where they are targeted to be each year. PCM does not have MAP data to use as a baseline as this is our inaugural year. Local state report card assessment data from 2018-19 reveals a need to focus on both Math and ELA. This need is likely more exacerbated by COVID.</p> <p>MAP will be PCM's tool of choice to establish a baseline and measure growth throughout the year. MAP will be used to establish a baseline for all students (2021-22, K-5<sup>th</sup> grade). Coming out of COVID, establishing this baseline is particularly important for honing in on students who need more intensive intervention in ELA and Math. MAP (fluency) will also be used to identify students with Dyslexia indicators.</p> <p>Students who score "Lo" or "Avg/Lo" will receive more targeted and intensive supports driven by the areas of need identified on their individualized reports combined with other formative assessments.</p>
Goal/ Lagging Indicator <i>What is the intended outcome?</i>	Of the students who score Lo Avg/Lo on their MAPS ELA and Math in Fall 2021, half of them will achieve their MAP Projected Growth Goals by the Spring 2022 testing session.

<p><b>Goal Connection</b>  <i>Describe how the goal captures the school mission/vision/educational program terms/student profile.</i></p>	<p>NWEA MAP Growth in ELA and math will allow us to track student progress in key academic areas necessary to succeed in school and life. Tracking progress in this way is essential to achieve our mission and ensure any gaps are closed during a student's progression from Grades K-9<sup>th</sup> grade. Additionally, as there is no state assessment for students in Grades K-2, MAP provides a necessary growth tracking tool.</p>		
<p><b>Leading Indicator:</b>            What actionable steps (ex. interventions) will be put in place to directly influence the outcome of the goal? How will you provide supports to staff to allow authentic implementation of the interventions?</p>	<p>Once students complete the benchmark assessment in the fall, our Head of School and Montessori Coach - Director of Academic Programs will meet to discuss the results and plan out interventions for students with Guides and their instructional assistants.</p> <p>PCM uses the vast breadth of Montessori math materials to find the right fit to stimulate students' interest and support growth. iReady may be used as an online tool when necessary. PCM uses Montessori materials and Heggerty at the earlier grade levels, to support ELA growth. NewsELA may also be used to supplement grade-level text.</p>		
<p><b>Metrics</b>  <i>How will you measure your goal?</i></p>	<p>Percentage of students who hit their growth goal for their MAP assessment in ELA and Math between fall and spring assessments.</p>		
<p><b>Targets</b>  <i>How will you know if you are successful? Set the cut-points for each target category and give the rationale for each cut-point. look at past trends, current performance, and comparative data to set target cut-points.</i></p>	<b>Category</b>	<b>Target</b>	<b>Rationale for the Target</b>
	Exceeds	>60% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2022 MAP assessment	This would mean a majority of our students met their growth target
	Meets	50-59% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2022 MAP assessment	This would meet the outcome of at least 50% of our students meeting their growth targets
	Does Not Meet	35-49% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2022 MAP assessment	This would indicate that our interventions were unsuccessful for a majority of our students
	Falls Far Below	<35% of students scoring Lo/Lo Avg meet their individual growth projection goals on Spring 2022 MAP assessment	This would indicate that our interventions are not correlated with the gaps identified by MAP and did not have a noticeable impact on most students' understanding of grade level standards

<p>Assessment Details, Data Collection and Verification</p> <p><i>Explain why the chosen means of assessment and criteria for success are appropriate for measuring performance toward the goal. How often will the school collect data for this goal and how will the school share results with key stakeholders (i.e., Commission, Board, etc.)? How will data be verified if audited?</i></p>	<p><b>Why:</b> This measurement tool is unique as it provides a measure of growth as well as data showing how PCM students are performing compared to a nationally normed set of students from across the country.</p> <p><b>Frequency:</b> PCM students in Grades K – 9 (2021-22 K-5) will take the NWEA MAP Growth assessment three times each academic year (fall, winter, spring) to evaluate growth goals and growth over time.</p> <p><b>Data-sharing &amp; Verification:</b> Data will be shared with Guides during data dives to advise individualized work plans and make mid-year course corrections. The data will be shared with parents in conjunction with Parent University sessions about how to interpret growth results. Progress toward goals will be reported quarterly to the PCM board of trustees. Data will be provided to the Washington State Charter School Commission as required, published in our July monthly newsletter, and provided for the board of trustees annual meeting. This report will provide plans for school-wide growth to ensure all students are experiencing adequate growth. Data can be verified through school records associated with each category. Data fed into the Montessori Dashboard becomes part of the national data set for public Montessori performance across the nation.</p>
<p style="text-align: center;"><b>Results Summary</b></p> <p style="text-align: center;"><i>Provide a brief summary of results and evidence of assessment.</i></p>	
<p><b>Background considerations:</b> this was a unique year for schools with COVID still having a heavy impact on student attendance, staff attendance, and social-emotional – executive functioning needs.</p> <p>Caution in interpretation of scores should be noted as the expected scores and growth projections are based off pre-COVID data. The cumulative effects of COVID on growth during this time has not been realized yet. No adjustment was made in our data to try to account for this, but it should be noted that we may see that during COVID kids did not make growth as quickly early on. We noted a significant need for counseling and social-emotional work across all students that far exceeded what would be considered normal pre-COVID. This need was high and, in some cases, needed to be addressed before academic need to make an impact on academic growth.</p> <p>As this was PCM’s first year the assessments set the baseline for us to plan for next year and to establish where our students were coming out of COVID and identify the major needs both academic and social-emotional.</p> <p><b>Results Summary:</b></p> <p><b>ELA –</b></p> <p><b>Language Usage MAP assessment (MEETS),</b> 30 student 2nd – 5th grade had valid test results in the Fall-Spring. 4 students did not have valid results for a test period due to being absent for the test or in minor cases not being enrolled yet or refusing to test. These students were excluded from the analysis.</p> <p>Of the students tested 43% of them tested in the Low to LowAvg quintile in the fall in Language Usage. Of the 13 students that scored in the Low to LowAvg quintile, 54% of them made their fall to spring projected growth according to the pre-COVID growth expectations identified by MAP. This places us in the Meet category.</p> <p>Of these 13 students, 38% fell into the High to HigAvg range, 23% fell in the Average range, and 39% fell into the Low to LowAvg growth range. More growth for more student was realized between the winter to spring than the fall to wintertime period. Race, gender, income status, prior school type, ELL, and IEP/504 status did not appear to produce a trend. It should be noted in many of these categories our numbers are so low within a category that trends can’t be truly identified. Absences did play a role in growth or lack thereof.</p>	

**Reading MAP assessment** (DOES NOT MEET *(by 1 student)-EXCEED in Winter to Spring*), 31 student 1<sup>st</sup> – 5<sup>th</sup> grade had valid test results in the Fall-Spring. 11 students did not have valid results for a test period due to being absent for the test or in minor cases not being enrolled yet or refusing to test. These students were excluded from the analysis.

Of the students tested 45% of them tested in the Low to LowAvg quintile in the fall in Reading. Of the 14 students that scored in the Low to LowAvg quintile, 43% of them made their fall to spring projected growth according to the pre-COVID growth expectations identified by MAP. This places us at the high end of the Does Not Meet category. This difference equates to 1 student. It can also be noted that between winter and spring 62% met their projected growth.

**Reflection Summary:** We noted that there was more apprehension or struggle presented by some students when taking the reading assessment. We also found a subset that struggled with reading on the computer versus on paper. This played some role in results for some students who we noted internally showed more growth internally than on MAP. Students also were presented some struggle moving between work that is hands on and manipulatable versus strictly on-screen. Test anxiety began to surface after the first assessment for some. These are all points we want to dig into more as a staff to expand students vocabulary and transferability.

The slow start for some of our key tools also played a role in growth and progress. This is mainly tied back to the effects of COVID which will not play the same role next year. Our [Waseca reading program](#) got a slower start than anticipated. Lexia and intensive Heggerty interventions were not implemented in full until later into the school year. Once implemented we did see improvement and look forward to beginning the year with strong implementation in the 2022-23 school year. Our reading specialist to support with Heggerty implementation and identifying and designing interventions for students with reading disabilities, including Dyslexia, will be on site at least three times this year, starting with our first MAP assessment which will produce a faster and strong start this coming year. We were not able to bring this person on site until January of this year. Having strong baselines on students, understanding what their high priority needs are, and having all systems in place, position us more strongly for this coming school year as well.

**MATH – (FALLS FAR BELOW *(by 3 student)-2 students within 2-3 points and one student within 4 points of making targeted growth to achieve MEETS*)**, 30 student 1<sup>st</sup> – 5<sup>th</sup> grade had valid test results in the Fall-Spring. 12 students did not have valid results for a test period due to being absent for the test or in minor cases not being enrolled yet or refusing to test. These students were excluded from the analysis. It can also be noted that the population of students in this category is more heavily weighted towards 4<sup>th</sup> and 5<sup>th</sup> graders (mostly 4<sup>th</sup>) than the ELA categories. This poses a larger challenge due to student's prior knowledge base, mindset towards math, and test anxiety around the subject.

Of the students tested, 45% of them tested in the Low to LowAvg quintile in the fall in Reading. Of the 14 students that scored in the Low to LowAvg quintile, 29% of them made their fall to spring projected growth according to the pre-COVID growth expectations identified by MAP. This places us at the high end of the Falls Far Below category. This difference equates to 3 students which would put us in the bottom of the Meets category. It can be noted that there are 2 students who were within 2-3 points of meeting their growth and 1 student within 4 points of meeting their growth.

**Reflection Summary:** We noticed early on students were coming in lower in math than other areas. We attributed this primarily to Math being more technical and, as the child advances, being more difficult to teach at home in a way that builds deep understanding to continually build off. Additionally, online math that relies primarily on worksheets, while it serves as a stopgap, is not ideal in building strong concrete foundational skills. We found we needed to build backwards to build missing skills in several our students, particularly older students, in order to provide the foundation for strong forward progress.

Another compounding factor for our older students is their perception towards Math and math tests similar to the more standard approach. While we worked on this with students there is still much work to be done to reduce anxiety enough for them to fully engage in testing in a way that will reflect their actual level.

As far as applied skills and problem solving, Math is one of the strongest areas for Montessori due to its hands-on concrete-to-abstract approach. That said it is also the area that students often test the lowest in on standardized tests at the early grade levels due to the deep divide in testing language and platform compared to the hands-on constructivist approach used in the classroom. While we were prepared for lower perceived performance from a test perspective in Math, we have identified language and approaches we will incorporate in the 2022-23 school year that will not compromise the fidelity of the Montessori math curriculum but rather compliment and strengthen students' ability to translate between different types of questions and platforms.



## **FIRST YEAR SITE VISIT: IS THE ORGANIZATION MEETING COMPLIANCE-RELATED STANDARDS?**

The purpose of site visits is to serve as a tool to inform continuous improvement for the Charter School Commission and its authorized schools and to provide data points in determining a charter school's compliance with the Organizational Performance Framework. The following notes are based on observations, data and artifact collection, and interviews following the First Year Site Visit.

<b>1. EDUCATION PROGRAM</b>
Sub-indicators
1a. Is the school implementing the material terms of the education program as defined in the current charter contract?
Area of Review
Compliance with the material terms of the education program in all material respects, and the education program in operation reflects the materials as defined in the charter contract, or approved amendments.
The mission of the School is as follows: To prepare all students to reach their full potential for future success in high school, college, career, and life, using the rich resources of our community.
Evidence to Support
<p>Pullman Community Montessori (PCM) had a challenging first year but continues to persevere. The most obvious issue was an overworked and under resourced school leader. The school's model originally included the Head of School and a Montessori Coach. Together, these two positions would work to ensure that the school was operationally and academically sound. The mid-year departure of the Montessori Coach caused significant disruption to the school, and particularly to the teaching staff who shared their concerns, frustrations, and exhaustion during their interviews. Significant culture-building work is an area of opportunity if the school is going to attract, recruit, and retain a high-quality teaching staff – particularly given the school's rural location and size.</p> <p>As the Head of School worked to ensure that the school could operate and serve students daily, some of the adult culture-building pieces could not occur and were not prioritized. Unfortunately, this bred distrust, resentment, and burnout amongst staff. A decision was made not to rehire for the Montessori Coach role mid-year. Leadership believed that they were likely to have a better candidate pool during a more traditional school hiring timeline – especially given the location of the school and the specialized Montessori training it requires. Leaders were also concerned about the impact of bringing in a new coach mid-year would have on the school's culture. In the interim, the school was able to rely on several other entities for support. The Montessori Coach was a priority hire for the 2022-23 school year (this position has been filled at the time of this report) so there is hope that the original leadership structure of the school will be brought to fruition and that will lead to a better second year.</p> <p>Additionally, the building of systems will be essential for the long-term sustainability of the school. Clear systems and structures will help to increase communication and transparency with teachers and help to ensure that decision making is not seen as arbitrary or subjective.</p> <p>However, it is worth noting that while teachers may have had challenges with administration and each other, there was clear evidence of their support to students and families. Observers witnessed supportive interactions between students and teachers that were consistent with the Montessori model.</p> <p>Most of the parents that were interviewed reported a generally positive experience and plan to enroll their students the following year. They are also looking forward to next year when they can have larger community activities to not only build relationships amongst school stakeholder groups but also with the larger community. This should help in potentially attracting new teachers and families to the school.</p> <p>While PCM had a challenging first year, the hiring of a new Montessori Coach should alleviate some of the concerns of the site visit team.</p>

Area of Review
<p>Education Program Terms:</p> <p>Education Program Term #1: Developmentally appropriate age-grouped classrooms</p> <ul style="list-style-type: none"> <li>• Three-year blocking of ages by developmental appropriateness in accordance with international Montessori standards.</li> <li>• Classrooms feature a dual certificated teacher paired with a trained classroom assistant with paraprofessional certification.</li> <li>• Specialized services for special education students (SpEd), ELL, highly capable students (HiCap), and others will be provided in the general education classroom, with staffing support to meet the needs of all students.</li> <li>• Teachers employ an integrated, place-based, Montessori curriculum aligned with all state standards.</li> </ul> <p>Observable Indicators</p> <ol style="list-style-type: none"> <li>1. Developmentally appropriate mixed-age classrooms: Classroom age groupings will adhere to the developmentally appropriate groupings detailed above with the aforementioned modification.</li> <li>2. Transitions and Progression: Mixed-age classrooms feature smooth and logical transitions, both throughout the day and as students progress through age groupings. Throughout a school day devoid of bells, students focus on personalized work plans, progressing through material in an order that fits their needs and interests. Similarly, progression between age groupings is based, not on definite ages, but on readiness of the student displayed through competency-based assessment.</li> <li>3. Integrated standards-aligned curriculum: Traditional core content curriculum is fully integrated in all age groupings. Students may be working on goals in multiple subject areas at the same time. Personalized work plans allow teachers and students to track progress on standards and ensure standards are met in a timely manner.</li> </ol> <p>Education Program Term #2: Self-directed learning environment</p> <ul style="list-style-type: none"> <li>• Morning and afternoon blocks of uninterrupted work time build focus and respects students' work.</li> <li>• Students build agency over their education by taking increasing ownership in the creation of personalized work plans (PWP) that incorporate their interests, setting SMART goals, reflecting on progress, and recalibrating. Unhealthy comparisons based on who is advanced or behind are diminished as each student has their own PWP, and they work collaboratively in a variety of different groups and settings to achieve their goals.</li> <li>• Learner-centered classrooms, where freedom is expanded with show of responsibility, builds intrinsic motivation. Flexible work groups, where students may work alone or in teacher-devised groups, provides another avenue for building agency, displaying responsibility, practicing collaboration skills, and participating in group problem solving.</li> </ul> <p>Observable Indicators</p> <ol style="list-style-type: none"> <li>1. Uninterrupted work time: Students are provided 3 hours of uninterrupted work time in the morning and 2-3 hours in the afternoons. Teachers will provide individual and/or small-group lessons at this time and specialists may work one-on-one or with small groups of students with similar needs within the classroom to advance skills. Students, with input from the teacher, may choose to work individually or with each other. Classroom</li> </ol>

assistants ensure students are building and honing strong collaboration skills with as little interference as possible, unless guidance is needed.

2. Student-driven, personalized work plans: Students are provided with teacher-guided opportunities to schedule, plan, prioritize and reflect on their own daily, weekly, and long-term learning tasks. All students will have goals they are working towards that are driven by their personal interests. They will have the flexibility of deciding (within limits) when, how often, and for how long they will work to reach their goals, helping students to develop an intimate understanding of how they learn. Personalized work plans are hosted on Transparent Classroom.

#### Education Program Term #3: Learning through action and community

- Ample opportunities for movement within an untraditional classroom environment and outdoor learning experiences increase engagement.
- Authentic, hands-on, engaging Montessori materials are featured in every K-upper elementary classroom. In the adolescent community program, physical materials give way to project-based learning through a place-based approach, which allows students to learn through authentic activities and build understanding in a local-to-global community context.
- Activities are grounded in a real-life context as frequently as possible, increasing student's ability to find relevance and make connections. Knowledge is further constructed through authentic experiences during project-based learning.
- Explicit and integrated social-emotional learning curriculum is featured across all grades. Employability skills are introduced in the adolescent program during project-based learning.

#### Observable Indicators

1. Hands-on, authentic materials and activities: Students physically engage with Montessori-aligned didactic materials. Materials, strategically featured and rotated in the classroom, are available to students based on displaying proficiency on sequential works. Project-based learning through a place-based approach allows students to learn through authentic activities and build understanding in a local-to-global community context. The physical space of the facility itself also presents a variety of authentic activities and experiences (community gardens, classroom organisms, etc.).

2. Building Community: Students engage in learning with and from each other daily through morning circle and work time. They frequently engage with the diverse resources of our local community—community members, businesses, libraries, the museums, university labs, parks, trails, and nature reserves—to complement and deepen classroom learning.

#### Evidence to Support

Observers were able to see evidence of all program terms during the site visit. Classroom visits were a particular highlight of this visit. Students, even those who were very young, could articulate what they were working on and what they were learning. Classrooms were quiet and calm and most students appeared to be engaged in their own learning.

Classrooms were filled with high quality materials. They were clean and organized and appeared developmentally appropriate. Interviews highlighted the ways in which the curriculum was aligned to state learning standards – which freed teachers from having to do this extra step in their planning.

PCM's teaching model of two adults in the classroom (a dual certificated teacher paired with a trained classroom assistant with paraprofessional certification) was observed. However, given some of the turnover within the school, the model was stretched very thin and teachers reported that their classroom assignments changed frequently in order to cover all classrooms daily. Given the Montessori model, teachers must have specific training in order to ensure they are implementing the educational program with fidelity. This makes finding substitute teachers challenging, if not, impossible. Given the realities of the COVID-19 pandemic, this placed a lot of pressure on the teachers and school as a whole as individuals dealt with their own health issues as well as community school closure, etc.

PCM is the only public Montessori option in Pullman. Since Montessori schools are often private and prohibitively expensive for some families, having this school as an option in the community is important. This sentiment was expressed by families and the board.

Overall, the academic programming appeared strong and was implemented with fidelity to the Montessori model and to what was proposed in the application.

**1b. Is the school complying with applicable education requirements?**

N/A for Site Visit

**1c. Is the school protecting the rights of students with disabilities?**

**Area of Review**

Equitable access and opportunity to enroll; identification, location, and evaluation of students who may be eligible for special education; provision of a Free and Appropriate Public Education in the least restrictive environment; provision of procedural safeguards to students with disabilities and their families; identification, location, and evaluation of students who may be eligible for 504 Plans; and provision of services and accommodations under Section 504.

**Evidence to Support**

Although staff described frustration with conflicts between the Montessori model and traditional Special Education provisions, particularly with contractors, there was evidence of integration and inclusion for all students. Special Education staff provide push-in support to all students to support their IEP goals. There is collaboration with general education staff to plan out lessons that students need to work on based on their needs, however, the majority of Specially Designed Instruction is performed by Special Education Staff.

Staff has a chart that shows which students need which services need to be provided at a particular time. There is a Special Education schedule and individual schedule for each student.

There were several challenges from this year that special education staff named, including solely acting as the Special Education Director, Nautilus Lead (for teacher evaluations), and PE teacher simultaneously. As these were intended to be filled by at least two full-time staff members, there was seemingly not enough time to manage the tasks required for each position. Further, having a Montessori coach was integral to the school model and support of staff in each of these roles, but was a vacancy for the second half of the school year. When asked if this workload/model is sustainable, they did not feel that it was, especially not long-term.

Special Education staff maintained appropriate records and service provisions from Commission observations.

**1d. Is the school protecting the rights of English Language Learner (ELL) students?**

**Area of Review**

The school has removed barriers to the enrollment and retention of ELL students. The school communicates with all English learners in a language they can understand. The school provides English language development services to English Language Learners (ELL)---national origin minority students with emerging English proficiency.

**Evidence to Support**

Teachers deliver ELL services themselves using a fully inclusive model. ELL Staff gives them tips and strategies to implement in their classrooms. ELL Staff meets with teachers to obtain anecdotal information about where students are and how they are progressing.

As for professional development opportunities, there was a training on WIDA during the summer. There was also a training one month prior to the site visit, which provided strategies and helped staff understand learning process for students, as well as big ideas for building students' vocabulary and background knowledge.

One challenge is that ELL lessons that have been taught to staff are not Montessori lessons, so staff are struggling to figure out what ELL support looks in the Montessori model.

**Corrective Action**

None

## 2. FINANCIAL MANGEMENT AND OVERSIGHT

### Sub-indicators

#### 2a. Is the school meeting financial reporting and compliance requirements?

N/A for Site Visit

#### 2b. Is the school following Generally Accepted Accounting Principles (GAAP)?

N/A for Site Visit

## 3. GOVERNANCE AND REPORTING

### Sub-indicators

#### 3a. Is the school governing board complying with compliance requirements?

##### Area of Review

The board complies with and presents no concerns in the following areas: 1) Adherence to board policies and procedures, including those established in the by-laws, and revision of policies and procedures, as necessary 2) Holding of all meetings in accordance with Open Public Meeting Laws and adhering to the rules and regulations of the Public Records Act 3) Effective and transparent management of conflicts of interest and code of ethics.

#### 3b. Is the governing board holding the school management team accountable?

##### Area of Review

Annual utilization of a performance-based evaluation to assess the board's own performance, as well as that of the school leader; collaboration with the school leader to establish clear objectives, priorities, and goals; the school governing board's willingness and skill in identifying issues with the school management team, taking corrective action, and implementing any corrective actions imposed

##### Evidence to Support

PCM has a committed board with a strong board chair. Most members are from the local community with at least one member who is not local but has strong charter experience. The board acknowledges that it was a hard year but had faith in the school leader and the school overall. They too believe it is important to have this school as an option for families in the community.

The board members interviewed felt as though they were holding the school leader accountable and that they could have frank conversations about the school's operations. This was evident in board meetings throughout the year. They did indicate that there was a bottleneck of information since everything has to go through the Head of School.

At the time of the interview they had not conducted the school leader evaluation, but would be conducting a 360 process using a Montessori-specific tool. They also intend to conduct stakeholder surveys so that they have broader feedback about the school in general.

Board members discussed various professional development that they are receiving with regards to diversity, equity, inclusion, and school finance – utilizing consultants.

The board has several vacancies so this is an area of opportunity for the school, but overall the board appears to understand their role, is committed to continuous improvement, and is holding the school leader accountable.

**3c. Is the school complying with reporting requirements?**

N/A for Site Visit

**Corrective Action**

None

**4. STUDENTS, PARENTS AND EMPLOYEES**

Sub-indicators

**4a. Is the school protecting the rights of all students?**

Area of Review

The school complies with and presents no concerns in the following areas: 1) designated at least one employee to coordinate and monitor the school's compliance with its responsibilities under Section 504, Title IX, ELL, McKinney-Vento, Foster Care and state nondiscrimination laws; 2) provides continuous notice regarding student civil rights; 3) has adopted discrimination complaint and appeal procedures and a sexual harassment policy and procedure that are consistent with the requirements in state law; 4) does not discriminate in the counseling, or guidance of students; 5) does not discriminate in the discipline of students 6) has an instructional materials policy and an accompanying procedure that includes a process to evaluate and eliminate bias pertaining to sex, race, creed, religion, color, national origin, veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog or service animal in all textbooks and instructional materials; 7) has removed barriers to the enrollment and retention of all students.

Evidence to Support

Based on the materials submitted and the interviews conducted, observers did not have concerns in these areas. The school had appropriate signage and coordinators listed. The school has all required policies in place.

**4b. Does the school's recurrent enrollment rate indicate equitable access to the school?**

N/A for Site Visit

**4c. Is the school meeting teacher and other staff credentialing requirements?**

N/A for Site Visit

**4d. Is the school respecting employee rights?**

N/A for Site Visit

**4e. Is the school completing required background checks?**

N/A for Site Visit

**Corrective Action**

None

**5. SCHOOL ENVIRONMENT**

Sub-indicators

**5a. Is the school complying with facilities and transportation requirements?**

Area of Review

The school complies with and presents no concerns in the following areas: 1) Health, Safety, Facility and Fire Code Requirements; 2) Facility Accessibility; 3) Compliance with legal obligations for providing student transportation.

**5b. Is the school complying with health and safety requirements?**

The school complies with and presents no concerns in the following areas: 1) Health and Safety Code Requirements; 2) Updated safety and emergency management plans.

Evidence to Support

The school is housed in a building with other community-based organizations. Observers witnessed adults escorting students to bathrooms, etc. to ensure they were not alone. One area that the school will need to improve upon in the 2022-23 school year is fire and safety drills. Given the co-location, this was a challenge this



**First Year Site Visit Report**  
**Pullman Community Montessori**

year. The Commission will be working closely with the school to ensure this happens in accordance with state law.
<b>5c. Is the school maintaining and handling information appropriately?</b>
<b>Area of Review</b>
The school complies with and presents no concerns in the following areas: proper and secure maintenance of student, governance, and finance records and proper and secure maintenance of testing materials.
<b>Evidence to Support</b>
No concerns were identified with regards to the proper and secure maintenance of school records.
<b>Corrective Action</b>
None



# Coversheet

## HOS Offer of Employment Amendment

**Section:** VII. New Business  
**Item:** A. HOS Offer of Employment Amendment  
**Purpose:** FYI  
**Submitted by:**  
**Related Material:**  
HOS\_2022-23\_to\_2025-26\_Employment\_Contract\_\_Amendment\_Proposed\_.pdf



**PULLMAN  
COMMUNITY  
MONTESSORI**

**PUBLIC  
FREE  
K-9**

## **EMPLOYMENT AGREEMENT**

PCM Head of School  
2022-23 School Year

August 12, 2022

Proposed Amendment to: Offer of Employment for 2022-23 School Year

Add the following to the Offer of Employment for 2022-23 School Year:

"Your 2022-23 through 2025-26 School Year contract includes 'catch-up compensation'. Catch up compensation will be \$30,000 paid in July 2026. Rational for this compensation includes recognition of the salary sacrifice made to ensure PCM could open and work towards financial sustainability during its startup years. This lump sum 'catch-up compensation' amount equates to having started at a locally competitive salary for a new elementary level superintendent. A data collection survey was conducted in the summer of 2022 to determine the locally competitive salary to be \$100,000. Basic salary increases from the 2023-24 through 2025-26 school year will follow the standard 2.5% cost of living increase annually. The following condition must be satisfied for the 'catch-up compensation' to be paid in July 2026: PCM must meet its financial sustainability mark of \$700,000 in the 2025-26 school year as outlined in the 6-year budget projection. This ensures the school is of sufficient financial sustainability to assume the cost of repaying debt and this 'catch-up compensation'. This 'catch-up compensation' will not be paid, even at a prorated amount, if the Head of School terminates their employment with PCM prior to August 14, 2026.

While PCM is considered an "at-will" employer, the PCM Board of Trustees guarantees that this contract will not be terminate by the board of trustees outside of gross negligence by the Head of School or continued poor performance after a growth plan has been initiated. Satisfactory growth and appraisal reviews for 2022-23 through 2025-26 school year performance based on duties and responsibilities outlined in the [HOS Position Description](#) is require for continued employment. PCM is dedicated to growth as an organization and in the growth of its students, families, and employees. To this end we are committed to ensuring personnel know where they sit in advance of the mid-year and annual reviews and working to support staff in their endeavor towards continuous growth an improvement."

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

John Cassleman  
Board Chair  
Pullman Community Montessori

Please sign below indicating your acceptance of the terms above.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Laylah Sullivan