



PCM Notice of Perceived Problem

March 4, 2024

Dear Washington State Charter Commission,

I am writing on behalf of the Pullman Community Montessori board of directors to provide an update on our ongoing efforts to ensure compliance with state regulations and standards. We believe deeply that maintaining compliance is crucial for our school's operations and, most importantly, for the well-being and education of our students.

Our team has been diligently working to address the areas of concern highlighted in the Notice of Perceived Problem #1 by the Commission. Some of them have already been addressed prior to the notice being rendered. I am pleased to report that significant progress on remaining areas of concern has been made, and we are confident in our ability to achieve full compliance. Please see the table below for a response, and some clarifications, to each of the areas highlighted by the Commission. Please let us know if any additional information is required by the Commission.

Thank you,

Robin McDonald, Board Member
Pullman Community Montessori



PCM Notice of Perceived Problem #1 Response

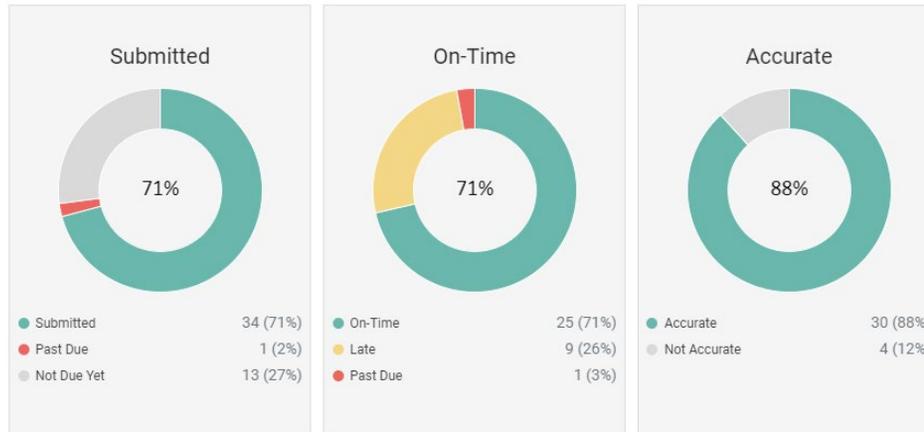
Area of Concern	Concerns	Updates, Information
<p>Lack of Effective Financial Oversight of the School: Student Enrollment</p>	<p>The school is currently at 69% of budgeted enrollment. As of February 12, 2024, the school reported 94 enrolled students compared to 136 budgeted.</p> <p>Insufficient cash flow to complete the school year without significant changes to operational and organizational structure.</p>	<p>The Board and the HOS understand that enrollment drives financial viability. They are working towards stabilizing enrollment and contingency planning for additional enrollment decreases.</p> <p>The budgeted enrollment was 136. As of September, we had 122. The recent enrollment drop has brought us to 85 as of 3/4/2024.</p> <p>PCM has responded to the enrollment drop by</p> <ul style="list-style-type: none"> ● Working with PCM families to address concerns to prevent further issues that lead to disenrollment (Parent committee, Town Halls). ● By implementing immediate budget cuts outlined below for the remainder of the 2023-24 budget period. The board voted to approve the budget with these changes at the February 26 board meeting. ● By reworking the growth plans for 2024-25 onward to ensure growth is achievable considering our current enrollment. <ul style="list-style-type: none"> ○ This has included working with Gladish to ensure they remain flexible with PCM's growth within the building. They said they would be. ● By considering what future model changes may need to be made to achieve a sustainable budget and avoid future issues. <ul style="list-style-type: none"> ○ The Head of School presented preliminary scenarios at the Feb 26 board meeting. ○ The board will choose a direction on this in early March and the Commission will be presented with a proposal to initiate considerations thereafter.



		<p>PCM has made the following adjustments to meet 30+ days of cash on hand by August 2024.</p> <ul style="list-style-type: none">• 3 staffing cuts (not re-hiring the Older Elementary Teacher and laying off an Instructional Assistant and Food Service Specialist).• The OE students moved to 205a next to the AC students, opening room 102 up for subletting. Dave will remain the AC teacher and Jordan will be the long-term sub for the OE cohort. The teachers will collaborate. There are times when the cohorts will be separate and times when they will join as a community.• Beginning March 1, PCM's contract with the YMCA for ½-day Wednesday enrichment has ended due to insufficient enrollment in the YMCA before and after care program, which was a requirement of PCM's agreement with the YMCA (a cost-savings of \$11K).• PCM negotiated with Gladish to reduce rent between April and August. We also negotiated to have Gladish actively work to lease the room to others, which would help PCM recoup more rent costs (this is not guaranteed, so we did not factor this in).• The remaining year's budget was scrubbed to see if there were other places we could tighten up the budget (ex., Field trips, office expenses, transportation costs). <p>These changes are providing 31 days of cash on hand by August 2024. This is the <u>budget file</u> that the Board approved for the remainder of the SY.</p> <p>PCM continues to implement recruiting efforts as originally outlined:</p> <ul style="list-style-type: none">• Contracted with Palladium for social media marketing• Text bank pushes with WA Charters• Direct marketing• Refuse stuffers in Albion, Colfax, and Pullman• Exhibitions of work in our community (mostly AC) - held event on February
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		<p>13, future events in March, April, and May.</p> <ul style="list-style-type: none"> ● Open houses on February 27 and March 20 ● City of Pullman Business of the Month in April (featured in community paper, posts on social media, attendance at the Pullman Chamber meeting). <p>The Board Treasurer and back-office provider Joule Growth Partners met with the Commission's Finance Committee on 2/28 and are working on the following updates:</p> <ul style="list-style-type: none"> ● A detailed plan of cash flow for the remainder of the school year ● A communication to families regarding the financial state of the school. ● A contingency plan for closure, for either mid-year or end-of-year closure.
<p>Lack of Effective Organizational and Educational Oversight of the School: Compliance</p>	<p>Continued pattern of late compliance submissions. Of the 38 Epicenter compliance submissions required by the charter contract, 12 (or 32%) have been submitted late this school year (August 1, 2023-February 16, 2023).</p>	<p>The Board recognizes the need for additional operational and compliance capacity. They have reached out to WA Charters and Schools Ops about additional remote and onsite support for compliance reporting.</p> <p>Based on the compliance calendar, PCM is tracking annually from September 1 to August 31; 71% of deliverables were submitted on time, 26% were late, and 1% were past due. The HOS met with the Commission on 3/4/24, and they agreed this dashboard reflects accurate data and that Epicenter data is not up to date. See the linked PCM Compliance tracker and snapshot below.</p> <p><u>PCM Compliance Tracker</u></p>



To ensure the on-time completion of compliance submissions improves, we will update our existing compliance tracker and improve on the following procedure.

Procedure for Completing Compliance Submissions on Time

Update the Tracker

- Tasks from the compliance tracker are added to the Compliance Google Calendar. This is viewable by all admin and office staff.
- Improvement: tasks will be assigned in Microsoft To Do to specific person with three reminders.
- Improvement: task will be checked off when completed.

Regular Check-In Meetings

1. Schedule Regular Meetings:



		<ul style="list-style-type: none">● Set up a recurring meeting in the calendar, inviting the Head of School, Operations Manager, and all team members involved in compliance tasks. Depending on the volume of tasks and proximity to deadlines, meetings can be weekly or bi-weekly. <p>2. Prepare for Meetings:</p> <ul style="list-style-type: none">● Prior to each meeting, the Operations Manager should review the Google Compliance Calendar and Microsoft To Do, noting any tasks that are at risk of being late.● Prepare an agenda that includes reviewing the status of each task, discussing any barriers to completion, and strategizing solutions to any issues. <p>3. Conduct Meetings:</p> <ul style="list-style-type: none">● Start with a brief overview of the current compliance submission status.● Review each task individually, focusing on those that are overdue or at risk.● Discuss any support the responsible person needs to complete their task on time.● Update the Microsoft To Do with an action plan for any tasks that are off track, including reassigning tasks if necessary. <p>4. Follow-Up Actions:</p> <ul style="list-style-type: none">● All members will check the running meeting organizer. Ensure action items are updated in Microsoft To Do.● Ensure that the PCM Google Compliance Calendar is updated based on the discussions and decisions made during the meeting.
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		<ul style="list-style-type: none">● If needed, the team will communicate with the Commission as far in advance as possible to request deadline extensions due to staff shortages, which may impact fidelity to this procedure. <p>Monitoring and Updates</p> <ol style="list-style-type: none">1. Continuous Monitoring:<ul style="list-style-type: none">● Encourage team members to update Microsoft To Do after any progress or completion of tasks.● The Operations Manager should monitor the system regularly to identify any tasks that may fall behind schedule.2. Ad Hoc Meetings:<ul style="list-style-type: none">● If a significant issue arises between scheduled meetings, arrange an ad hoc meeting with the relevant stakeholders to address the issue promptly.3. Adjustments and Improvements:<ul style="list-style-type: none">● Continuously look for ways to improve the process based on feedback from team members and observations from the check-in meetings.4. Documentation and Record-Keeping<ul style="list-style-type: none">● Ensure that all compliance documentation is properly filed in Box and accessible for audit purposes.● Keep a record of all meeting minutes and decisions made regarding compliance tasks (use standard meeting organizer format).5. Review and Feedback
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		<ul style="list-style-type: none"> Periodically review the effectiveness of the PCM Compliance tracking system and the check-in meeting process. Solicit feedback from the team on how the process could be improved and implement feasible suggestions. <p>By following this procedure, the school can enhance its ability to complete compliance submissions on time, leveraging the collaborative and organizational strengths of the PCM Compliance tracker and regular communication through check-in meetings.</p>
	<p>The School's 22-23 school year Annual Performance Report (due 10/1/23) is currently outstanding, after multiple extensions and missed deadlines.</p>	<p>The HOS is working to submit this no later than March 11. The school understands this is significantly past due and appreciates the grace. They are working diligently to provide the Commission with all the requested compliance documents.</p>
	<p>Did not immediately notify CSC of decreased enrollment when it fell below 80% on 1/30/24. Submitted on 2/2/24 after CSC staff reminder.</p>	<p>The school did notify the Commission of enrollment status falling below 80% on 1/30 but did not email the formal Decrease in Enrollment Form until 2-2-24.</p> <p>In the future, the school will make all efforts to ensure the use of the Commission's formal form with the first correspondence.</p> <p>Folder of Enrollment Emails Sent</p> <p>CSC was notified on the following days (in green):</p> <ul style="list-style-type: none"> Wk01 > 1/29, 1/30, 1/31, 2/01, 2/02, Wk02 > 2/05, 2/06, 2/07, 2/08, 2/09 Wk03 > 2/12, 2/13, 2/14, 2/15, 2/16



		<ul style="list-style-type: none"> • Wk04 > 2/19, 2/20, 2/21, 2/22, 2/23 • Wk05 > 2/26, 2/27, 2/28, 2/29, 3/01 • Wk06 > 3/04 <p>Notes:</p> <ul style="list-style-type: none"> ❖ 2/7 The Operations Manager sent the totals to HOS, but they weren't forwarded to the CSC. That email is included in a separate folder in the link above. ❖ 2/09 -2/20 The Operations Manager misunderstood that the notifications still needed to be sent to the CSC daily. She thought the reason was to track the direct impact that DJ had on student W/Ds. Since most of the class had withdrawn and that room was now stable, she did not send the reports. They were still being tracked internally as is standard. There were no withdrawals from 2/09 thru 2/20. ❖ 2/22 The Operations Manager's misunderstanding was corrected and she was delegated the task of sending the update directly to the CSC and copying Board Chair and HOS to streamline notifications.
	<p>OSPI notified CSC on 1/30/24 that PCM had not submitted the restraint and isolation data for the 22-23 school year. Written summary reports must be submitted by Jan 1st annually.</p>	<p>Restraint and Isolation data is submitted to OSPI directly from our Student Information System through CEDARS File S. We reviewed our 2022-23 submission because of this flag from OSPI. We re-submitted the data on 2/22/24. See screenshots of documentation here: Folder of Restraint & Isolation data.</p> <p>We have added this to our Google Compliance Calendar, created an SOP, and added it to Microsoft To Do (SOP linked) so that responsible staff understands how to submit it properly and who to check in with.</p> <p>Additionally, we have updated our Nautilus report form in Transparent Classroom</p>



		<p>to more quickly identify incidents where R&I was needed and required a report. This got backlogged previously, where information was in Transparent Classroom but not yet in our Student Information System, but the form improvement will eliminate this issue.</p>
	<p>A former employee submitted concerns on 1/26/24 about the limited number of individuals trained in restraint. On the CSC visit on 2/1/24, CSC observed the use of restraint in a lower elementary classroom. Individual incidents of restraint and isolation need to be reported.</p>	<p>PCM, at the projected size of 136 students, strives to maintain 4-5 restraint-trained staff members. Right after winter break, we dropped to 3 restraint-trained staff until the 2 new SPED IA's were trained at the end of January. PCM is currently at 4 restraint-trained staff. We will maintain this number for the remainder of the school year. This is more than sufficient for our population size and needs and ensures at least two staff members are available during staff outages.</p> <p>The incident of restraint on 2/1/24 was reported. The data was re-submitted on 2/22/2024. A copy of the report can be found here: <u>Folder of Restraint & Isolation data</u>.</p> <p>The use of restraint and isolation with any student is an absolute last resort and is used only if necessary to control spontaneous behavior that poses an imminent likelihood of serious harm to the student or others. The use of restraint by PCM staff is undertaken in accordance with state and federal law.</p> <p>We maintain a commitment to training the intentionally chosen staff members to respond to crisis situations to prevent the overuse of restraint. The full staff has received de-escalation training along with related follow-up workshops. They also receive 1:1 on-site coaching sessions from the True Measure Collaborative.</p>



<p>Administrative Team Capacity</p>	<p>The approved admin structure is not being implemented with fidelity. While there is a Montessori Coach (MC), many duties on page 387 of the charter app are being fulfilled by HOS. In the JD, the MC should have acted on behalf of HOS in their absence, but that didn't happen this Winter.</p> <p>On 1/30/24, the board is considering hiring an AP instead of MC. Compromising the requirement for the role in the approved charter is in danger of violating program terms. This lack of administrative support has impacted the school's compliance with the charter contract.</p>	<p>The Board recognizes the need for additional instructional leadership and staff leadership capacity to support the current administrative team. They are working to secure on-site coaching and support for the Head of School for the remainder of the school year.</p> <p>The MC was intended to fill their full role this year in a week on-site, week remote schedule. When we had difficulty getting the international candidate here, the best course of action was to have the MC sub in the classroom to avoid enrollment loss. The process took longer than expected (we had hoped initially to have them start after Fall break). We experienced issues with educational credit equivalency for the NWEd program after it was determined experience and education credits would satisfy the H1B application. This resulted in the candidate not being eligible this year. We began looking for a sub to complete the year following winter break. This process got behind with the release of DJ and the following actions. A sub was hired and began on Feb 21. Unfortunately, Jill will have to take medical leave. None of these issues could have been foreseen.</p> <p>This winter, the school contracted with <u>Letty Rising</u>, an experienced Montessori school leader, to be the interim Head of School from January 9th - February 8th and therefore did not need the Montessori Coach to fill in on the Head of School's behalf. The HOS was not going to be off site for the full week each week and lived 10 minutes from the school and planned to be available for communication.</p> <p>Due to the unforeseen need to release DJ, the Head of School remained onsite to handle various urgent matters. Letty Rising supported the classrooms and teachers, filling more of the MC's role. The HOS continued to support the school during this time on a part-time basis and has provided administrative support during this period.</p> <p>The board is not pursuing an Assistant Principal role for this school year at this time.</p>
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	<p>Inadequate systems to facilitate staff transitions resulted in a series of allegations and complaints by former employees to the school community, CSC, a state legislator, and state agencies. Need a better system for facilitating staff transitions to reduce the negative impact on the community.</p>	<p>We maintain a <u>staff retention tracker</u> which outlines how positions have evolved and transitioned over the years. The majority of the staffing roles fall under the expected transition or low concern reason. They left PCM because they were moving or for health/family/other employment reasons.</p> <p>We have offered exit interviews to all departed/exited staff. The interviews are with the HOS and/or a board member. Almost all employees have participated in this activity. If a grievance was presented with their departure (3 employees, one just last week), we make all efforts to address their concerns per our grievance policy.</p> <p>PCM follows a strict protocol when employees leave, are terminated, or are laid off. Their email is immediately disconnected in addition to their access to any PCM system. Their badges and codes are also immediately cleared. Two former staff members opted to use their personal email addresses to email the parent community following their departure from PCM.</p> <p>Improvements can be made by developing an exit survey form in Transparent Classroom (similar to the exit survey for families) that the staff member can complete along with (or in lieu of) their exit survey.</p>
<p>Board Capacity and Governance</p>	<p>Since the Spring of 2023, the board has been operating below the required number of trustees. Minimum is five. The fifth member was voted on 2/9/24, but one member is exiting end of February.</p>	<p>As of February 2024, we had the required number of trustees as stated in our bylaws. As of 2/26/24, we dropped back down to 4 trustees with the sudden resignation of one of our board members. Dorrie Main verbally resigned from the board after the executive session on 2/26. The board is working to find her replacement and continue board recruitment efforts. We have several strong board candidates interested in joining the board and committees. At least one will be interviewed at the next working board meeting in March.</p> <p>The board recently recruited Robin McDonald and interviewed her at a working session of the board on Feb 9, 2024, and voted her in at the same meeting. Robin has been an active board member, attending all meetings. Robin has participated</p>



		<p>in a hiring interview, along with school leadership and a staff member. Robin is a parent of students in our school and a local businesswoman with experience in HR, budgeting, management, and marketing.</p> <p>Christopher Albano has completed his application packet and will be interviewed at our next working session on March 14. Christopher has attended recent board meetings to observe and learn. Christopher is a Communications & Electronic Systems expert with a proven record for the careful management of sensitive information and situations. He is passionate about public education, with an interest in Full Inclusion and Montessori methodologies. He is respectful of the unique challenges and legal constraints that come with operating inside the public sphere.</p> <p>Alan McPhee is in the process of learning more about serving on the finance committee/potential board service/potential job shadowing of the current treasurer. Alan is a retired CPA, and has a grandson attending the school. He has indicated his intent to complete his application packet for board service. The Board Chair and Treasurer will follow up with him. If he completes his application and decides to proceed, we will also interview Alan at our March 14 working session.</p> <p>We are working towards having seven board members and will continue our extensive outreach to our community to further round out the skill set of our board and committees.</p>
	<p>The approved charter includes three advisory bodies:</p> <p>Community Advisory Council (families and community members) Provides feedback about</p>	<p>At the February 14, 2024 Special Board Meeting, the board of trustees reviewed action steps gathered from the PCM Families Town Hall (January 31, 2024). The board of trustees is restarting/launching two committees, Academic Excellence and Leadership Support and Evaluation Committee (LSEC). The board has struggled to maintain committees due to a lack of participants and a small board size.</p> <p>A board member, head of school, and co-chairs of the recently re-activated</p>



	<p>how the school and leadership are performing.</p> <p>Specialized Support Council (families of children in need of elevated services) Serves as a sounding board and support group directing families to resources, services, and information.</p> <p>Student Advisory Council (students + Montessori Coach + 1 parent volunteer) Bridging the student-adult world, share ideas, and surveys the students.</p> <p>The Board has not ensured that the structures it put in place as part of the charter application, to ensure that communication and collaboration were consistent, have been implemented.</p>	<p>Support and Coordination Council (SCC) are meeting regularly - bi-weekly - to improve the flow of information and communication between the school, parents, and community. In our second year of operation, feedback led us to revise our council structure. Families desired one council with discrete opportunities to volunteer and participate when it fit their interests and schedules. The SCC replaces the Community Advisory and the Specialized Support Council. The SCC started last spring, co-chaired by Elise Albano and Dorrie Main, but unfortunately didn't continue through the end of the school year.</p> <p>The community was not as interested in the Student Advisory Council and Specialized Support Council and preferred to have one centralized council. We have solicited feedback from students directly and through classroom surveys (ex. what kind of activities the kids were interested in). This allows us to gather more feedback from more students.</p> <p>Board members have connected with the volunteer and fundraising committees from the SCC and scheduled a meeting to discuss opportunities this year to address immediate needs in the classroom that we can support as a community.</p> <p>The Board and School Leadership will hold additional Town Hall Meetings in collaboration with the SCC. Format and frequency were a topic for discussion at the board meeting on 2/26 during committee reporting time.</p>
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	<p>The Board is obligated to oversee the School so that the School complies with its legal and contractual obligations. The Board also has responsibility for the School's performance, even when some of the obligations are delegated to the Head of School. The Board has been made aware of the Perceived Problems, above, but has not exercised adequate governance in order to ensure compliance and/or remedy identified performance, legal, and/or contractual concerns.</p>	<p>The board provides oversight of the Head of School's leadership in several key domains:</p> <p>Compliance Oversight: The board has added working sessions and special meetings to address the concerns of families, staff, and the community. The board reviews the PCM compliance tracker (linked above) at monthly board meetings.</p> <p>Parent Community Oversight: Board members consistently attend the Support and Coordination Council to ensure the parents' and community's concerns are heard. There is a new standing item for the SCC to report out at the regular board meetings similar to what the SCC was encouraged to do last year. Board members have made available open office hours where parents, staff, or community members may schedule time to connect either in person or by phone. This was communicated to families through Parent Square as well as with flyers at the front office, one-on-one interactions with staff and parents in the halls, and a notification through the SCC to parent groups on Facebook.</p> <p>Staff Oversight: Board members have connected with 6 staff members and 1 parent to schedule meetings and have already met with 3 staff members and scheduled a meeting with 1 other staff member and the parent. The purpose of these meetings is to get insight into culture and climate at the school and staff experience.</p> <p>Direct HOS Oversight: The board chair meets with the Head of School on a semi-monthly to weekly basis to provide support and guidance.</p> <p>Continuous Board Oversight Improvement: The current board chair has received regular governance coaching and support from BoardonTrack (BOT) and WA Charters since the Fall of 2023 and will continue until the rest of the school year. This coaching has included the completion of an annual BOT board self-assessment to drive board improvements.</p>
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		<p>BoardOnTrack will provide deepened support from March 1 onward to the board in the following ways:</p> <ul style="list-style-type: none">- Review the Feb. 26 board meeting recording and provide feedback on ways to strengthen board meeting operations.- Review board agendas before board meetings.- Governance coaching calls with board members on topics like:<ul style="list-style-type: none">- Navigating challenging issues and dynamics- Generating ideas for board recruitment- Better utilizing the BoardonTrack portal- Supporting leadership transition and contingency planning
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	<p>There is not strong evidence to suggest that the Board is holding the Head of School accountable to resolving concerns brought up by members of the school community, which has contributed to students withdrawing from the school.</p>	<p>The Board is working diligently and around the clock to identify a viable plan for major changes at the school while considering operational, financial, and sustainability impacts.</p> <p>Board members have met with the HOS to ask questions and gain context. Board members have surveyed staff twice (once before winter break, and once after winter break) and met with staff members individually. Board members have responded to questions from families and the community and encouraged parties to reach out to the school and attend board meetings and SCC meetings. The board chair has worked with the HOS and SCC to get information to families that is considered most important to families.</p> <p>The board held an executive session at the February 26 Regular Board Meeting to evaluate the performance for the Head of School. No actions were taken during the executive session. Returning to the regular session following the executive session, the board asked for more time to take action and acknowledged change is necessary.</p> <p>The Board is holding a Special Meeting on March 5th, 2024, to follow up on the discussion at the February 26th Monthly Board Meeting about the Head of School's performance and discuss the resignation (effective end of the academic year) submitted by the Head of School to the Board on March 1, 2024. The Board will also discuss the possibility of engaging an independent, 3rd party-led investigation regarding the concerns shared in the Commission's three corrective action notices. The Board has notified the Commission of the special meeting and the resignation. The Board is also working to secure on-site coaching and support for the Head of School for the remainder of the school year and has preliminarily discussed this with Letty Rising, the former interim Head of School who filled in when the current HOS was on leave earlier this year. The Board is also working with WA Charters to have an employee, who is also a former charter elementary school principal, be on-site at scheduled intervals throughout the spring to support with leadership capacity-building and community communications.</p>
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