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December 14, 2023

El Dorado County Superintendent of Schools Office
Attn: Dr. Ed Manansala
6767 Green Valley Rd
Placerville, CA 95667

Subject: Clarksville Charter School Response to FCMAT AB139 Audit

Dear Superintendent Manansala,

Clarksville Charter School acknowledges the recent release of the FCMAT Extraordinary Audit report on November 20, 2023. We maintained a cooperative relationship with FCMAT throughout the audit process and proactively implemented corrective actions over the past three years, beginning with the separation from Inspire Charter Schools, to address concerns highlighted by the county superintendents. This letter intends to provide a comprehensive overview of the steps taken to identify potential vulnerabilities in these areas and the changes made to enhance transparency, fiscal practices, attendance reporting, and enrollment procedures at our school.

Transparency Enhancements:

- In July 2019, Clarksville Charter School board transitioned away from Inspire Charter Schools as the sole member entity was removed, placing the decision-making authority solely in the hands of our Board of Directors and administrative leaders.
- Developed robust policies and procedures in collaboration with school staff, consultants, and legal experts, subsequently approved by the board.
- Regularly published financial reports in board packets, board meeting agendas and minutes, and school policies on our website.
- Conducted open forums and meetings to foster information dissemination, address concerns, and solicit feedback.
- Implemented a transparent communication strategy to ensure educational partners are informed about school decisions and activities.
- Provide ongoing documentation to the authorizing district as requested and report out at authorizer board meetings as requested, further reinforcing the commitment to transparency and accountability.



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Fiscal Practices (Expenditures & Purchasing):

- Developed and maintained a comprehensive Fiscal Policies and Procedures Manual, subject to annual review and updates (see Appendix A for full manual, last update 1/23).
- Assumed control of school bank account, cash management, and school divvy card, conducting weekly meetings with the back office to monitor expenditures and ensure compliance with established requirements.
- Added an internal Chief Financial Officer to our staff to oversee financial operations and work with the back office, in alignment with regulatory compliance.
- Established a rigorous multi-step approval process for financial transactions, accompanied by staff training to ensure strict adherence to procurement guidelines.
- Meticulously document all financial transactions, detailing their educational purpose and alignment with approved budgets as well as state and federal spending requirements.
- Engage independent auditors annually to scrutinize financial records and procedures, with a transition to a new auditor starting the 22-23 school year.

Attendance Practices:

- Assumed responsibility for overseeing attendance collection and guiding compliance measures for our state reporting team in our Charter Service Organization.
- Established a solid attendance claiming, review, reporting, and data archiving processes for each learning period.
 - Attendance claims are entered and reviewed, using a three tiered approach involving members of the Educational Team, Compliance Team and State Reporting Team each Learning Period.
- Continued training and provided support to teams involved in compliance-related tasks to ensure best practices and compliance.
 - The State Reporting team attends training sessions that are held by the California Department of Education (CDE), Local County of Education (COEs) and various related professional organizations.
- Created an internal attendance anomaly and claim error correction workflow that involves the review and approval of the Educational, Compliance and State Reporting Teams.
 - Homeschool teacher (HST) and Compliance Specialist/Coordinator are included in all attendance correction requests initiated by the State Reporting Team. The relevant data is communicated to the HST regarding the claim issue. HST then makes the correction in the SIS or communicates potential issues with the State Reporting Team for analysis and/or resolution.



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- Attendance is reviewed again, in preparation for each Principal Apportionment reporting period.
- Solidified the attendance related workflows for Short-Term Medical Absences and Disciplinary Absences.
- Maintained and ensured access to the school's attendance records.

Enrollment Procedures:

- Adopted a Residency Policy in 2019, reviewed and updated annually as needed (See Appendix B for full Residency Policy, updated 9/23).
- Developed an updated Admissions & Enrollment Policy in 2021, outlining procedures aligning with our charter petition and relevant laws, including protocols for public random drawing/lottery (see Appendix C for Admissions & Enrollment Policy, updated 10/23).
- Obtain annual board and authorizer approval of enrollment numbers
- Strictly adhered to enrollment guidelines and regulations, prioritizing fairness and equity in the enrollment process.
- Collect Proof of Residency documents annually to verify student residence within the boundaries of counties served by the school.
- Implemented a procedure where students residing outside the boundaries served by the school are withdrawn through the formal withdrawal process to maintain compliance and accurate enrollment records.

Clarksville Charter School maintains an unwavering commitment to upholding the highest standards of accountability, transparency, and fiscal responsibility. We remain committed to the regular review and updating of policies, ensuring adherence to best practices and alignment with any legal updates. Through these ongoing efforts, we strive for continuous improvement to better serve our students, families, and community.

We eagerly welcome any further guidance or recommendations from the El Dorado County Office of Education to further strengthen our operations. Thank you for your continued support and guidance.

Sincerely,

Jenell Sherman
Executive Director



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Appendices:

- A. [Fiscal Policies & Procedures Manual](#)
- B. [Residency Policy](#)
- C. [Admissions & Enrollment Policy](#)

CLARKSVILLE CHARTER SCHOOL

Fiscal Policies and Procedures

Revised 1/19/23

Table of Contents

OVERVIEW AND GENERAL BUSINESS POLICIES	1
BUDGET DEVELOPMENT, OVERSIGHT CALENDAR AND RESPONSIBILITIES	1
BUDGET TRANSFERS	3
BANKING ARRANGEMENTS	3
RECORD KEEPING	3
PROPERTY INVENTORY	3
ATTENDANCE ACCOUNTING	4
ANNUAL FINANCIAL AUDIT	4
REQUIRED BUDGET AND OTHER FISCAL REPORTS	5
PROPERTY AND LIABILITY INSURANCE	5
BOARD COMPENSATION	5
FUNDRAISING, GRANT SOLICITATION, AND DONATION RECOGNITION	5
CONTRACTS	6
PURCHASING AND VENDOR PAYMENT	7
SEGREGATION OF DUTIES	7
GENERAL PURCHASING PROCEDURES	7
PURCHASE ORDERS	8
PAYMENT AUTHORIZATION	8
ACCOUNTS PAYABLE CHECKS	9
BANK RECONCILIATIONS	10
CASH RECEIPT MANAGEMENT	11
GENERAL PROCEDURES FOR NON-GOVERNMENTAL CASH RECEIPTS	11
VOLUNTEER EXPENSES	12
RETURNED CHECK POLICY	12
PAYROLL SERVICES AND SETUP	13
TIMESHEETS	13
OVERTIME	13
PAYROLL PROCESSING	14
PAYROLL TAXES AND RECORD KEEPING	14
EXPENSE REPORTS	15
TRAVEL	15
TELEPHONE USAGE	15
FINANCE AND FINANCIAL REPORTING	16
MONTHLY REPORTING	16
THIRD PARTY LOANS	16
FUND BALANCE RESERVE	16

Clarksville Charter School

Fiscal Policies and Procedures

OVERVIEW AND GENERAL BUSINESS POLICIES

The Board of Clarksville Charter School has reviewed and adopted the following policies and procedures to ensure the most effective use of the funds of the School to support the mission and to ensure that the funds are budgeted, accounted for, expended, and maintained appropriately.

1. The Board approves financial policies and procedures, delegate's administration of the policies and procedures to the Executive Director and reviews operations and activities on a regular basis.
2. The Executive Director has responsibility for all operations and activities related to financial management. However, the Board and Executive Director can appoint or delegate someone else to perform the responsibilities.
3. Financial duties and responsibilities must be separated so that no one employee has sole control authorizing transactions, recording financial transactions and custody of assets.
4. The School will maintain in effect the following principles in its ongoing fiscal management practices to ensure that:
 - a. expenditures are authorized by and in accord with amounts specified in the board-adopted budget,
 - b. the school's funds are managed and held in a manner that provides a high degree of protection of the school's assets, and
 - c. all transactions are recorded and documented in an appropriate manner.

Budget Development, Oversight Calendar and Responsibilities

The School will develop and monitor its budget in accord with the annual budget development and monitoring calendar as specified below.

January - April

Charter Impact works with the Executive Director and Chief Fiscal Officer to review Governor's proposed state budget for the upcoming fiscal year, and identify the likely range of revenues for the school's upcoming fiscal year (July 1 - June 30) based on projected enrollment. Once the revenue estimates are complete, Charter Impact, the Executive Director, and the Chief Fiscal Officer will develop the remainder of the budget including staffing levels, review of fixed costs and discretionary spending. Then a five-year budget projection is developed in accordance with the schools' established strategic and growth plans.

Clarksville Charter School Fiscal Policies and Procedures

Budget Development, Oversight Calendar and Responsibilities (continued)

May – June

Charter Impact, the Executive Director, and the Chief Fiscal Officer review revenue projections subsequent to the Governor’s annual “May Revise” budget figures, fine-tunes the upcoming fiscal year budget to accommodate any changes. This budget will include monthly cash flow projections. The Board reviews and formally adopts a budget for upcoming fiscal year before June 15. A copy of the final budget is provided to the charter-granting agency.

July – August

Books for prior fiscal year are closed by Charter Impact, all transactions are posted, and records assembled for audit.

The budget is reviewed subsequent to the adoption of the state Budget Act and necessary adjustments are made. A copy of the revised final budget is provided to the charter-granting agency, if applicable.

September – December

The independent auditor performs audit of the closed fiscal year and prepares audit report for submission to the Audit Committee.

At the end of the first full week of school, the Executive Director reviews the Charter School’s actual attendance figures and notifies the Board if actual attendance is below budget projections. If needed, the school’s budget is revised to match likely revenues.

The Audit Committee of the Board reviews a copy of the audit. The Executive Director addresses any audit exceptions or adverse findings. Once the Board approves the audit report, it is submitted to the charter-granting agency.

On a monthly basis, the Executive Director and Board reviews current year actual versus budgeted revenues and expenditures and other financial reports as presented by Charter Impact. The Board approves any needed changes to the annual budget.

Clarksville Charter School Fiscal Policies and Procedures

Budget Transfers

The Executive Director may transfer up to \$100,000 from one unrestricted budget item to another without board approval but shall notify the Board of the transfer at the next regularly scheduled meeting.

Banking Arrangements

The School will maintain its accounts either in the County Treasury or at a federally insured commercial bank or credit union. Funds will be deposited in non-speculative accounts including federally-insured savings or checking accounts or invested in non-speculative federally-backed instruments or in the County's Pooled Money Investment Fund. If funds are held in accounts outside of the County Treasury, the Board must appoint and approve all individuals authorized to sign checks or warrants in accord with these policies. Charter Impact will reconcile the school's ledger(s) with its bank accounts or accounts in the county treasury on a monthly basis.

Record Keeping

Transaction ledgers, duplicate unsigned checks, attendance and entitlement records, payroll records, and any other necessary fiscal documents will be maintained by school staff in a secure location for at least three years, or as long as required by applicable law, whichever is longer.

Appropriate back-up copies of electronic and paper documentation, including financial and attendance accounting data, will be regularly prepared and stored in a secure off-site location, separate from the school.

Charter Impact will retain electronic records at their site for a minimum of two years; after which, the remaining years will be the responsibility of the School.

Property Inventory

The Executive Director shall establish and maintain an inventory of all non-consumable goods and equipment worth over \$1,000. This inventory shall include the original purchase price and date, a brief description, serial numbers, and other information appropriate for documenting the school's assets. This property will be inventoried on an annual basis and lists of any missing property shall be presented to the Board.

All non-consumable school property lent to students shall be returned to the school no later than 5 working days after withdrawal of student.

Any excess or surplus property owned by the school may be sold or auctioned by the Executive Director provided the Executive Director engages in due diligence to maximize the value of the sale or auction to the school. The sale or auction of property owned by the school with a fair market value in excess of \$1,000 shall be approved in advance by the Board. The Executive

Clarksville Charter School Fiscal Policies and Procedures

Director will immediately notify Charter Impact of all cases of theft, loss, damage or destruction of assets.

Attendance Accounting

The Executive Director shall establish a contract with a third-party vendor for attendance tracking. Responsibilities include maintaining an appropriate attendance accounting system and recording the number of days students are in attendance at the School and engaged in the activities required of them by the School. The annual audit will review actual attendance accounting records and practices to ensure compliance. The attendance accounting practices will be in conformance with the Charter Schools Act and the applicable California Administrative Code sections defining Charter School Average Daily Attendance. Therefore:

1. ADA will be computed by dividing the actual number of days of student attendance by the number of calendar days of instruction by the School.
2. The School's instructional calendar will include at least 175 days of instruction to avoid the fiscal penalty for providing fewer than 175 days of instruction as provided by the Administrative Code regulation. The calendar must also document that the school offers an amount of annual minutes of instruction as required pursuant to applicable law.
3. Independent study must be pre-arranged by the student's adult guardian and the School and that the adult guardian will be required to complete and submit documentation of engagement in instructional activity to the school on forms prepared by the school. As applicable, such study shall be in full compliance with law governing independent study.

Annual Financial Audit

The Board will annually appoint an audit committee by January 1 to oversee the independent auditors for that fiscal year. Clarksville Charter School will appoint an audit lead to ensure an audit is undertaken on an annual basis. The audit lead will be the main point of contact for the board, school, Charter Impact, and the auditor. Any persons with expenditure authorization or recording responsibilities within the school may not serve as the audit lead. The school board shall annually contract for the services of an independent certified public accountant to perform an annual fiscal audit. The audit shall include, but not be limited to (1) an audit of the accuracy of school's financial statements, (2) an audit of the school's attendance accounting and revenue claims practices, and in conjunction with (1) and (2) above, review the school's internal controls over financial reporting. The audit shall be prepared in accordance with any relevant Office of Management and Budget audit circulars if the School spends in excess of the amount which requires an audit.

The Audit shall be completed, reviewed by the Board, and submitted to the charter-granting agency, the County Office of Education, the Office of the State Controller, and California Department of Education prior to December 15 of each year unless any of those entities extend the deadline.

Clarksville Charter School

Fiscal Policies and Procedures

Required Budget and Other Fiscal Reports

The Executive Director, working in conjunction with Charter Impact, and the Chief Fiscal Officer will produce and submit to the charter granting agency any and all required fiscal reports as may be required by state or federal law, or mandated by the terms of the school's charter. These include, but are not limited to, attendance reports, enrollment and other data reports required by the California Basic Education Data System, and other related data.

Property and Liability Insurance and Workers Compensation

The Executive Director shall ensure that the school retains appropriate property and liability insurance coverage, as well as a Workers Compensation Policy for its employees.

Property insurance shall be obtained and address business interruption and casualty needs, including flood, fire, earthquake, and other hazards with replacement cost coverage for all assets listed in the school's Property Inventory and consumables. Premises and Board errors and omissions liability insurance shall also be obtained and kept in force at all times on a "claims made" form with a self-insured retention of no more than \$50,000 per occurrence and limit of no less than \$5 million per occurrence. The school's Executive Director and other staff who manage funds shall be placed under a fidelity bond.

Workers Compensation insurance shall be maintained by the school to cover injuries suffered by employees while at work. The school will be required at a minimum to carry a basic liability limit consistent with the statutory requirements of the authorizer or the District.

Board Compensation

Board members shall serve without compensation, but a virtual or in-person meeting stipend and/or reimbursements for actual and necessary expenses. Expenses for travel necessary to attending board meetings and meetings of board committees need not be approved in advance by the board. All other expenses shall be approved in advance by the board. Travel expenses reimbursed shall not exceed levels that would be subject to federal or state income tax. All expenses reimbursed shall be documented by receipts and in no event may reimbursements exceed actual expenses.

Fundraising, Grant Solicitation, and Donation Recognition

Fundraising or grant solicitation activities over \$100,000 on behalf of the school must be approved in advance by the Board. The Board shall be informed of any conditions, restrictions, or compliance requirements associated with the receipt of such funds, including grants or categorical programs sponsored by the state or federal government. The Board shall be notified no later than the next regular board meeting of the award or receipt of any funds and shall approve the receipt of any grants, donations, or receipts of fundraising proceeds prior to their deposit in the school's accounts.

Contracts

Clarksville Charter School Fiscal Policies and Procedures

Consideration will be made of in-house capabilities to accomplish services before contracting for them. Except as otherwise provided in these policies, the Executive Director may enter into contracts and agreements not to exceed \$50,000 without Board approval, provided funds sufficient for the contract or agreement are authorized and available within the school's board-adopted budget. Contracts and agreements in excess of \$50,000 must be submitted for board approval and may be executed by the Executive Director or other person specifically designated by the Board after the Board has duly approved the contract or agreement.

Staff designee will keep and maintain a contract file evidencing the competitive bids obtained (if any) and the justification of need for any contracts over \$25,000. Competitive bids will be obtained where required by law or otherwise deemed appropriate and in the best interests of the school.

Written contracts clearly defining work to be performed will be maintained for all contract service providers (i.e. consultants, independent contractors, subcontractors). Contract service providers must show proof of being licensed and bonded, if applicable, and of having adequate liability insurance and worker's compensation insurance currently in effect. The Executive Director may also require that contract service providers list the school as an additional insured.

If the contract service provider is a sole proprietor or a partnership (including LP, and LLP), the School will obtain a W-9 from the contract service provider prior to submitting any requests for payments to Charter Impact.

The Executive Director will approve proposed contracts and modifications in writing. Contract service providers will be paid in accordance with approved contracts as work is performed. The Executive Director will be responsible for ensuring the terms of the contracts are fulfilled. Potential conflicts of interest will be disclosed upfront, and the Executive Director and/or Member(s) of the Governing Board with the conflict will excuse themselves from discussions and from voting on the contract.

Clarksville Charter School

Fiscal Policies and Procedures

PURCHASING AND VENDOR PAYMENT

Segregation of Duties

The School will develop and maintain a system to document the authorization of non-payroll expenditures. All proposed expenditures must be approved by the Executive Director and/or designated staff, who will review the proposed expenditure to determine whether it is consistent with the Board-adopted budget. In the absence of a vendor invoice, the School will develop and maintain a check request form to document the approval of payment for specific items.

All transactions will be posted in an electronic general ledger maintained by Charter Impact. To ensure segregation of recording and authorization, the bookkeeper may not co-sign check requests for purchase orders.

General Purchasing Procedures

All purchases over \$25,000 must include documentation of a good faith effort to secure the lowest possible cost for comparable goods or services. The Executive Director shall not approve purchase orders or check requests lacking such documentation. Documentation shall be attached to all check and purchase order requests showing that at least three vendors of similar type were contacted and such documentation shall be maintained for three years. All purchases in excess of \$25,000 must be bid by a board-approved process, except in the cases:

1. In case of emergencies that necessitate the purchase of emergency response supplies, equipment, or services.
2. The supplier is the Original Equipment Manufacturer for which no equivalent competition exists.

In such cases, the school shall document the reason why the purchase was done without a competitive bidding process, and why the pricing was determined to be reasonable. The Executive Director may authorize expenditures and may sign related contracts within the approved budget. The Governing Board must review all expenditures. This will be done via approval of a check register which lists all checks written during a set period of time and includes check #, payee, date, and amount. The Governing Board must also approve contracts and non-budgeted expenses over \$50,000.

When approving purchases, the Executive Director or designee must:

- a. Determine if the expenditure is budgeted
- b. Determine if funds are currently available for expenditures (i.e. cash flow)
- c. Determine if the expenditure is allowable under the appropriate revenue source

Clarksville Charter School Fiscal Policies and Procedures

- d. Determine if the expenditure is appropriate and consistent with the vision, approved charter, school policies and procedures, and any related laws or applicable regulations
- e. Determine if the price is competitive and prudent.

Any individual making an authorized purchase on behalf of the school must provide Charter Impact with appropriate documentation of the purchase. Individuals other than those specified above are not authorized to make purchases without pre-approval.

Individuals who use personal funds to make unauthorized purchases will not be reimbursed. Authorized purchases will be promptly reimbursed by a bank check upon receipt of appropriate documentation of the purchase.

The Executive Director may authorize an individual to use a school credit card, if the school elects to use a credit card, to make an authorized purchase on behalf of the school, consistent with guidelines provided by the Executive Director and/or Governing Board. The following provisions apply to credit card purchases:

1. All credit card purchases must have prior approval.
2. Receipts for the purchase must be submitted for each purchase
3. Each purchase must have the approved budget codes for each transaction
4. If receipts are not available or are “missing”, the individual making the charge will be held responsible for payment.
5. Cards will bear the names of both the Schools and the authorized card holder.

Purchase Orders

All non-recurring purchases for which the vendor requires the use of a purchase order, which must be approved by the Executive Director and/or Admin Designee through Smartsheets.

1. Once approval is received in Smartsheets for the creation of the PO, the third-party contractor or staff designee will create a PO and assign PO numbers in sequential order.
2. The numbered PO is then logged and uploaded into Smartsheets which lists all issued PO's.
3. The PO is then sent to the Executive Director or Admin Designee For approval signature.
4. The PO is emailed to the Admin Designee to send to the vendor.

Payment Authorization

All original invoices will be forwarded to the Executive Director or Admin Designee for approval through the online approval system.

1. For any cumulative fiscal year purchase over \$600.00 a W-9 is required to be on file.

Clarksville Charter School Fiscal Policies and Procedures

2. The third-party contractor or staff designee will compile all invoices and supporting documentation (including applicable PO) and verify that the specified products/services were received. The documentation will then be sent to the Executive Directors and/or Admin Designee for review and approval.
3. The Executive Director or Admin Designee will carefully review each invoice and supporting documentation prior to approval.
4. Approval from the Executive Director or Admin Designee will be indicated by a signature on an invoice, email, or other electronic documentation process. The invoice and supporting documentation including any new W-9 will be sent to Charter Impact on at least a weekly basis (Executive Director should be aware of invoice due dates to avoid late payments). Charter Impact will then process the invoices with sufficient supporting documentation. Payment will not occur if a W-9 is required and not on file with Charter Impact.
5. The Executive Director and/or Chief Fiscal Officer may authorize Charter Impact to pay recurring expenses (e.g. utilities) without the Executive Director's formal approval (signature) on the invoice when dollar amounts fall within a predetermined range. A list of the vendors and the dollar range for each vendor must be provided to Charter Impact in writing and updated on an annual basis.

Accounts Payable Checks

The Governing Board will approve, in advance, the list of authorized signers on the school account. The Executive Director and any other employee authorized by the Governing Board may sign bank checks within established limitations.

1. Checks exceeding \$50,000 will require review and approval of second authorized signer.
2. Charter Impact does not use pre-printed check stock to avoid the risk of theft.
3. When there is a need to generate a check, the designated staff will send appropriate approved documentation to Charter Impact. This is usually an approved invoice or Check Request Form by the school.
4. Once approved by the Executive Director or Chief Fiscal Officer, Charter Impact prepares the check based on the check authorization prior to obtaining the appropriate signature(s).
5. Checks may not be written to cash, bearer, or petty cash. Under no circumstance will any individual sign a blank check.
6. Charter Impact will record the check transaction(s) into the appropriate checkbook and in the general ledger.
7. Charter Impact will distribute the checks and vouchers as follows:
 - a. Original – mailed or delivered to payee

Clarksville Charter School Fiscal Policies and Procedures

- b. Duplicate or voucher – attached to the invoice and filed by vendor name by a Charter Impact accountant.
- c. Canceled Checks – maintained with the banking institution.
- d. Voided checks will have the signature line cut out and will have VOID written in ink. The original check will be attached to the duplicate and forwarded to Charter Impact who will attach any other related documentation as appropriate.

Bank Reconciliations

Charter Impact will maintain view-only online access to School bank accounts. On a monthly basis, Charter Impact will download the monthly bank activity/statement directly from the bank. Once the statement is received:

- 1. Charter Impact will examine all paid checks for date, name, cancellation, and endorsement. Any discrepancies regarding the paid checks or any checks over 90 days will be researched and if applicable deleted from the accounting system.
- 2. Charter Impact will prepare the bank reconciliation, verifying the bank statements and facilitating any necessary reconciliation.
- 3. Charter Impact will compare the reconciled bank balance to the cash in the bank account and to the general ledger, immediately reporting any discrepancies to the Executive Director.

Cash Receipt Management

General Procedures for Non-Governmental Cash Receipts

For all fundraising activities approved by the board, the School will establish internal controls to ensure the safeguarding of assets. The following are general procedures for recurring activities:

- 1. For each fundraising or other event in which cash or checks will be collected, a Volunteer Coordinator will be designated, who will be responsible for collecting and holding all cash and checks for the purpose of the fundraising activity.
 - a. The Volunteer Coordinator will record each transaction in a receipt book at the time the transaction is made, with a copy of the receipt provided to the donor.
 - b. The cash, checks, receipt book, and deposit summary must be given to the school Staff designee by the end of the next school day, who will immediately put the funds in a secure, locked location.
 - c. Both the Volunteer Coordinator and the Staff delegate will count the deposit and verify the amount of the funds in writing.
- 2. Cash/checks dropped off at the school office will be placed directly into a lock box by the person dropping off the cash/checks.

Clarksville Charter School Fiscal Policies and Procedures

- a. All funds are deposited into the lock box in a sealed envelope, along with any notes, forms, or other descriptions of how the funds are to be used.
 - b. The Staff delegate and one other staff member will jointly open the lock box to verify the cash/check amounts and sign off on the amounts received.
 - c. The lock box will be emptied at least two times per week, corresponding to days when deposits are made.
3. All checks will be immediately endorsed with the school deposit stamp, containing the following information: "For Deposit Only"
 4. A deposit slip will be completed by the Staff delegate and initialed by the Executive Director for approval to deposit. The deposit slip will be duplicated and documentation for all receipts (copy of check, letter, etc.) will be attached to the duplicate deposit slip.
 5. Deposits totaling greater than \$2,000 will be deposited the next business day by the designated school employee. Deposits totaling less than \$2,000 will be made at least monthly by the designated school employee. All cash will be immediately put into a lock box.
 6. The duplicate deposit slip and deposit receipt will be attached to the deposit documentation and forwarded to Charter Impact to be filed and recorded weekly.

Volunteer Expenses

All volunteers will submit a purchase requisition form to the Executive Director for all potential expenses. Only items with prior written authorization from the Executive Director will be paid/reimbursed.

Returned Check Policy

A returned-check processing fee will be charged for checks returned as non-sufficient funds (NSF). Unless otherwise pre-approved by Charter Impact or the Executive Director, payment of the NSF check and processing fee must be made by money order or certified check.

In the event that a second NSF check is received for any individual, in addition to the processing fee, the individual will lose check-writing privileges. Payment of the NSF check, the processing fee and any subsequent payment(s) by that individual must be made by money order or certified check.

In the case of NSF checks written by parents of students, failure to pay may result in the withholding of report cards/transcripts at the end of the semester and/or school year until payment is received, unless other mutually agreeable arrangements are approved by the

Clarksville Charter School Fiscal Policies and Procedures

Executive Director and/or Governing Board. If unsuccessful in collecting funds owed, the school may initiate appropriate collection and/or legal action at the discretion of the Executive Director and/or Governing Board.

HUMAN RESOURCES AND PAYROLL

Payroll Services and Setup

Charter Impact prepares payroll checks, tax and retirement withholdings, tax statements, and to perform other payroll support functions. The Director of Human Resources will establish and oversee a system to prepare time and attendance reports and submit payroll check requests. The Payroll contractor will review payroll statements each pay period to ensure that (1) the salaries are consistent with staff contracts and personnel policies and (2) the proper tax, retirement, disability, and other withholdings have been deducted and forwarded to the appropriate authority. All staff expense reimbursements will be on checks separate from payroll checks.

Upon hiring of staff, the Director of Human Resources will be responsible for the creation of a personnel file with all appropriate payroll-related documentation and completing or providing all the items on the Employee Payroll Set-up/Change Form. Items include a completed employment application form, a federal I-9 form, tax withholding forms, retirement date, and an accounting of the use of sick leave.

Timesheets

Non-exempt employees must accurately complete time records within the School's time keeping system on a daily basis. Each time record must show the exact time work began and ended, the meal periods taken, and employee signature. Absences and overtime must be accurately identified on the employee's time record. Non-exempt employees are not allowed to work "off the clock." All time actually worked must be recorded. Each employee must sign and submit his or her own time record. Incomplete and late timesheets will be held until the next pay period. No non-exempt employee will be paid until a correctly completed timesheet is submitted.

Exempt employees must report full days of absence from work. Deductions from an exempt employee's salary will be made only in accordance with applicable law. Employees should immediately contact Human Resources with any questions concerning their pay so that inadvertent errors can be corrected.

Clarksville Charter School Fiscal Policies and Procedures

Payroll Processing

All employees must submit electronic timesheets each pay period verifying the days and number of hours worked. The Executive Director or designee will approve these timesheets. No overtime hours should be listed on timesheets without the supervisor's prior approval. All leave requests must be submitted and reviewed through the same attendance management system. All leave taken must be documented on the corresponding timesheet. Human Resources will provide the school employee with any payroll-related information such as sick leave, vacation pay, and/or any other unpaid time.

Payroll is processed within 10 days after the period in which it is earned for hourly employees.

1. The school's contracted payroll personnel will submit a Payroll Summary Report of timesheets to Charter Impact for processing.
2. Charter Impact will prepare the payroll worksheet based on the summary report.
3. Charter Impact will issue direct deposit or mail checks directly to the employee.

Payroll Taxes and Record Keeping

Charter Impact will prepare payroll check summaries, tax and withholding summaries, and other payroll tracking summaries based on the reporting submitted.

Charter Impact will also prepare the state and federal quarterly and annual payroll tax forms for income tax withholdings, Social Security and Medicare and submit the forms to the respective agencies on behalf of the school. Charter Impact will prepare the quarterly state returns for unemployment and disability, review the forms with the Executive Director and Chief Fiscal Officer, and submit the forms to the state on behalf of the school.

The Director of Human Resources and contracted payroll staff will maintain written records of all full time employees' use of sick leave, vacation pay, and any other unpaid time.

1. Human Resources will immediately notify the Executive Director if an employee exceeds the accrued sick leave or vacation pay or has any other unpaid absences.
2. Records will be reconciled when requested by the employee. Each employee must maintain personal contemporaneous records.

Expense Reports

Employees will be reimbursed for expenditures within thirty (30) business days of presentation of appropriate documentation. Receipts or other appropriate documentation will be required for all expenses over five dollars and all reports must be approved by the Executive Director or designee. Expenses not requested for reimbursement in the same fiscal year will be denied.

Executive Director expense reports must be approved by the Chief Fiscal Officer and always be submitted to Charter Impact for processing and payment, petty cash may not be used.

Clarksville Charter School

Fiscal Policies and Procedures

FINANCE AND FINANCIAL REPORTING

Monthly Reporting

Charter Impact will submit a monthly financial report including:

- a. Statement of Financial Position
- b. Budget vs. Actual Report
- c. Monthly Forecast
- d. Accounts Payable Aging
- e. Monthly Check Register
- f. Statement of Cash Flows

The report will be reviewed at the scheduled board meeting and action will be taken, if appropriate.

Third Party Loans

The Executive Director and the Board will approve all loans from third parties. In the case of a long-term loan, approval may also be required from the charter-granting agency in accordance with the terms of the charter petition and/or other lenders in accordance with the loan documents.

Once approved, a promissory note will be prepared and signed by the Executive Director before funds are borrowed.

Fund Balance Reserve

A fund balance reserve will be maintained in compliance with 5 CCR § 15450. Charter Impact will provide the Executive Director with a Statement of Financial Position monthly. It is the responsibility of the Executive Director and the Governing Board to understand the school's financial situation. It is the responsibility of the Executive Director to prioritize payments as needed. The Executive Director has responsibility for all operations and activities related to financial management.

Residency Policy

Clarksville Charter School

BP 5111.1
Adopted: 10/24/19
Revised: 09/13/23, v9

California law requires that certain residency requirements be established in order for a student to be enrolled in an independent study charter school for which average daily attendance may be claimed. California law requires that a student be a California resident and requires that the student be a resident of the county in which the apportionment claim is reported or of a county immediately adjacent to the county in which the apportionment claim is reported. [EC §§ 47612(b), 51747.3]

The purpose of the Clarksville Charter School Governing Board approving this Residency Policy is to accomplish the following:

1. Define Residency
2. Outline Residency for a Student on an Extended Vacation
3. Establish the Location Materials Will Be Mailed To
4. Outline the Procedures When a Student's Residency is in Question
5. Establish Process of Proof of Residency if Document or Student Residency Questionnaire Not Provided at Beginning of the School Year
6. Outline the Parent/Guardian/Education Rights Holder's Right Regarding Determination of Non Residency
7. Outline the Procedures for Military, Homeless, Foster Youth, and Migratory students.

Definition of Residency: A student has residency in the state and county of the residence of the parent/guardian with whom that student maintains their place of abode. Residence denotes any factual place of abode of some permanence that is more than a mere temporary sojourn. Owning a home in California or in a particular county does not qualify a student to attend Clarksville Charter School unless it can be shown that the student is also living in the home at least three school days per week (Monday through Friday) during the academic year.

Residency for a Student on an Extended Vacation: A student who maintains residence in a county served by Clarksville Charter but is on an extended vacation not lasting longer than 20 school days, will not be deemed to have lost California residency. During this travel, the student will meet virtually with the teacher and complete assigned work and assessments. The family is responsible for notifying their HST (if applicable, the Education Specialist and any other staff who participate in the education of the student) for the first and last day of the Extended Vacation. If a student has the need for an extension of the 20 school days, the approval of the school's Executive Director or designee is required in a written communication.

The Location Material(s) Will Be Mailed To: The Location Instructional Material(s) Will Be Mailed To:

All instructional materials will be mailed to the address identified in the student's records at the physical address provided in the approved Proof Of Residency document.

Residency Policy

Clarksville Charter School

BP 5111.1
Adopted: 10/24/19
Revised: 09/13/23, v9

With the Executive Director's or designee's approval, the following may be approved:

GUIDELINES-

- P.O. Box within the same county as the physical address
- Address provided by military order
- Property address listed on Student Residency Questionnaire
- Homeschool Teacher's address
- Alternate property address within the same county as the approved POR or a contiguous country served by the charter

If the special circumstance does not fall within the guidelines (as stated above), a request may be made via the POR/Residency Questionnaire form. A decision will be made by the Executive Director or designee.

Student's Residency is in Question: If there is reason to believe that a student's residency is in question, Clarksville Charter School may investigate in order to determine the authenticity of the home address. When it is determined that a student lives outside of California and/or an authorized county, Clarksville Charter School will provide written notice of the determination of nonresidency within five days of Clarksville's intention to disenroll the student.

Proof of Residency Document/Student Residency Questionnaire Not Provided by the Beginning of the School Year: A student who has not provided an approved Proof of Residency or Student Residency Questionnaire by the start of their enrollment for each school year will have 5 school days to provide the Proof of Residency or Student Residency Questionnaire. If the student has still not provided the Proof of Residency or Student Residency Questionnaire by the fifth day of enrollment, the School will provide written notice of the School's intention to disenroll the student effective five school days later.

Parent/Guardian/Education Rights Holder's Right Regarding Determination of Nonresidency: The notice shall contain an explanation of the parent/guardian/education rights holder's right to request a hearing adjudicated by a neutral officer within 5 school days at which the pupil has a fair opportunity to present testimony, evidence, and witnesses and confront and cross-examine witnesses, and at which the pupil has the right to bring legal counsel or an advocate to dispute the finding of nonresidency. If the parent/guardian/educational rights holder does not request a hearing within five days of receipt of the notice, the right to a hearing is waived, and the student will be immediately disenrolled. If the student's parent, guardian, or educational rights holder initiates the hearing, the student shall remain enrolled and shall not be disenrolled until Clarksville Charter School issues a final decision.

Children of Military Families: Clarksville Charter School will serve children of military families, as defined by Education Code Section 49701, as follows:

1. Allow the student to continue their education in Clarksville Charter School, regardless of

Residency Policy

Clarksville Charter School

BP 5111.1
Adopted: 10/24/19
Revised: 09/13/23, v9

change of residence of the military family during that school year, for the duration of the student's status as a child of a military family; or

2. For a student whose status changes due to the end of military service by their parent during a school year, comply with either of the following, as applicable:

- a. If the student is enrolled in TK through 8th grade, allow the student to continue their education in Clarksville Charter School through the duration of that academic school year.
- b. If the child is enrolled in high school, allow the student to continue their education at Clarksville Charter School through graduation.

Once Clarksville Charter School is notified that a student is identified as a child of a military family, Clarksville Charter School will require the parent/guardian to submit the following documentation:

1. Written proof of the transfer, including the time period for the transfer and location of the transfer
2. A signed affidavit that states that the student is only enrolled in Clarksville Charter School and not in any other full-day educational program and that the student qualifies as a child of a military family as defined in Education Code Section 49701

For high school students, the aforementioned documentation will need to be resubmitted on an annual basis. Clarksville Charter School reserves the right to re-verify all of the above at any time throughout the school year.

Homeless Youth: Clarksville Charter School will be considered a pupil's school of origin for a homeless youth when the child attended Clarksville Charter School when permanently housed or was last enrolled in Clarksville Charter School before becoming homeless. Clarksville Charter School will serve homeless youth, as defined below, whose residency has changed as follows:

1. Allow the student to continue their education at Clarksville Charter School for the duration of homelessness.
2. If the pupil is no longer homeless before the end of the academic year, either of the following applies:
 - a. If the homeless youth is in high school, the Clarksville Charter School shall allow the formerly homeless child to continue their education at the Clarksville Charter School through graduation.
 - b. If the homeless youth is in TK through 8th grade, Clarksville Charter School shall allow the formerly homeless youth to continue their education at Clarksville Charter School through the duration of the academic year.

The term "homeless youth" or "homeless pupil" shall mean individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of 42 USC Section 11302(a)(1)) and includes:

Residency Policy

Clarksville Charter School

BP 5111.1

Adopted: 10/24/19

Revised: 09/13/23, v9

1. Children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;
2. Children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of 42 USC section 11302(a)(2)(C));
3. Children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and 4. migratory children (as such term is defined in 20 USC Section 6399) who qualify as homeless for the purposes of this part because the children are living in circumstances described in clauses (i) through (iii).

Foster Youth: Clarksville Charter School will be considered a pupil's school of origin for a foster youth when the child attended Clarksville Charter School at the initial detention or placement or any subsequent change in placement of a foster child for the duration of the jurisdiction of the court. Clarksville Charter School will serve former foster youth, as defined below, whose residency has changed as follows:

1. If the jurisdiction of the court is terminated before the end of an academic year, the Clarksville Charter School shall allow a former foster child who is in TK through 8th grade, to continue their education in the school of origin through the duration of the academic school year.
2. If the jurisdiction of the court is terminated while a foster child is in high school, Clarksville Charter School shall allow the former foster child to continue their education at Clarksville Charter School through graduation. The term foster youth, foster child, or student in foster care means any of the following: (Education Code 42238.01, 48853.5)
3. A child who is the subject of a petition filed pursuant to Welfare and Institutions Code 300, whether or not the child has been removed from the child's home by the juvenile court pursuant to Welfare and Institutions Code 319 or 361.
4. A child who is the subject of a petition filed pursuant to Welfare and Institutions Code 602 has been removed from the child's home by the juvenile court pursuant to Welfare and Institutions Code 727 and is in foster care as defined by Welfare and Institutions Code 727.4(d).
5. A nonminor who is under the transition jurisdiction of a juvenile court, as described in Welfare and Institutions Code 450, and satisfies the criteria specified in Education Code 42238.01.
6. A dependent child of the court of an Indian tribe, consortium of tribes, or tribal organization who is the subject of a petition filed in the tribal court pursuant to the court's jurisdiction in accordance with the tribe's law
7. A child who is the subject of a voluntary placement agreement, as defined in Welfare and Institutions Code 11400

Residency Policy

Clarksville Charter School

BP 5111.1
Adopted: 10/24/19
Revised: 09/13/23, v9

Migratory Youth: Clarksville Charter School will be considered a pupil's school of origin for a migratory youth when the child attended Clarksville Charter School at the time the pupil's status changed to that of a migratory youth. Clarksville Charter School will serve migratory youth, as defined below, whose residency has changed as follows:

1. If the migratory youth is enrolled in TK through 8th grade, allow the pupil to continue their education at Clarksville Charter School through the duration of that academic school year.
2. If the migratory youth is enrolled in high school, allow the pupil to continue their education at Clarksville Charter School through graduation.

The term "migratory youth" means a child who has moved with a parent, guardian, or other person having custody, from one school to another, either within the State of California or from another state, within the 12-month period immediately preceding their identification as such a child, in order that the child, a parent, guardian, or other member of their immediate family might secure temporary or seasonal employment in an agricultural or fishing activity and whose parents or guardians have been informed of the child's eligibility for migrant education services. "Migratory youth" includes a child who, without the parent or guardian, has continued to migrate annually to secure temporary or seasonal employment in an agricultural or fishing activity.

CLARKSVILLE
CHARTER SCHOOL

Admissions & Enrollment Policy

Clarksville Charter School

BP5111

Adopted: 01/19/21

Revised: 10/11/23, v5

Clarksville Charter School (“School”) is committed to providing quality education to all students who wish to attend in accordance with applicable law. Based on available resources, it may be necessary to limit admissions, and in that event, a Public Random Drawing/Lottery will be held to determine admission.

The School will implement this policy in compliance with Education Code Section 220. In addition, admission preferences will not limit enrollment access for pupils with disabilities, academically low achieving pupils, English Learners, neglected or delinquent pupils, homeless pupils, or pupils who are economically disadvantaged, as determined by eligibility for any free or reduced-price meal program, foster youth, or pupils based on nationality, race, ethnicity, or sexual orientation.

The purpose of the Clarksville Charter School Governing Board approving the Admissions and Enrollment Policy is to accomplish the following:

1. Establish the procedures for admissions and enrollment in Clarksville Charter School (“School”) in accordance with School’s charter petition and applicable law.
2. Establish the procedures under which Clarksville Charter School (“School”) will conduct the School’s public random drawing/lottery in the event that applications for enrollment exceed the School’s capacity.

Application and Enrollment: The School is a nonclassroom-based charter school that operates solely as an independent study program. Admission to the School is open to any student who resides within the boundaries of El Dorado County or an adjacent county. The School will accept all students who wish to attend, so long as it has the capacity to serve them in accordance with Education Code Section 47605(e).

1. **Determining Capacity:** The School’s Board or Executive Director will annually determine the maximum enrollment by “grade level” (by specific grade level or encompassing all grade levels served) for each school year based on, among other factors, the annual budget, staffing, applicable legal requirements, and available resources prior to the start of the Open Enrollment Period. The Executive Director may update the School’s capacity throughout the year as needed to meet the school's needs.
2. **Open Enrollment Period and Application Deadline:** The Board or Executive Director will set an Open Enrollment Period each year. Applications will be accepted during the publicly advertised Open Enrollment Period each year for enrollment in the following school year.
3. No student who resides outside of the granting agency county or a county directly adjacent thereto will be admitted to the School, unless a legal exception applies.
4. No student who does not meet the minimum age for admission in accordance with

California law will be admitted to the School. According to *EC 48000[a]*, a child shall be admitted to a kindergarten maintained by the school district at the beginning of a school year or at a later time in the same year if the child will have his or her fifth birthday on or before September 1 for the 2014-15 school year and **thereafter**.

- In the 2023–24 school year, children who will turn five years old between September 2 and April 2* are eligible for TK.
- In the 2024–25 school year, children who turn five years old between September 2 and June 2* are eligible for TK.
- In the 2025–26 school year, and in each school year thereafter, children who will turn four years old by September 1* are eligible for TK.

***Inclusive of these dates**

5. Authorization for the School to request and receive student records from all schools the student has previously attended or is currently attending;
6. Proof of full immunization or exemption from the requirement;
7. Proof of health examinations required by the Health and Safety Code;
8. Proof of age with the application for admission through documents such as the following: birth records, statements by the local registrar or a county recorder certifying the date of birth, baptism certificate duly attested, a declaration from the parent/guardian or a passport;
9. Proof of residency through documents such as the following: parent or guardian's drivers' license, ID card or DMV printout, a copy of a lease, utility bill or similar showing the address of the residence; California tax returns giving California as the home address (within acceptable dates); car registration and/or car insurance; California health insurance or Medi-Cal ID;
10. If any information provided by the parents/guardians could indicate immigration status, citizenship status, or national origin information, the School shall not use the acquired information to discriminate against any students or families or bar children from enrolling in or attending the School. If parents or guardians choose not to provide information that could indicate their children's immigration status, citizenship status, or national origin information, the School shall not use such actions as a basis to discriminate against any students or families or bar children from enrolling or attending school; [Note: These statements relating to immigration, citizenship status and national origin information are required by Education Code section 234.7.]

Current Families Required to Confirm Intent to Return: Families with currently enrolled students must submit a form/application to confirm their intent to return to the school next year and/or continue with their current teacher by the end of the Open Enrollment Period to remain enrolled in the School for the following school year. If an enrolled student fails to provide this form/application, they will not have guaranteed admission for the following school year as a currently enrolled student. This means the student loses their spot and will have to submit another application if they are interested in

enrolling in the School for the following school year.

1. Determine if a lottery is Needed: Applications will be accepted during a publicly advertised open enrollment period each year for enrollment in the following school year. Following the open enrollment lottery each year, applications shall be counted to determine whether the School has received more applications than capacity.

- If there are more spots available than applicants, the School will not conduct a lottery. The School will enroll all applicants and inform them that they are enrolled.
- If the School receives more applications than spaces available, the School will hold a public random drawing conducted in accordance with the procedures set forth in this Policy, the School's charter, and applicable law to determine admission for the impacted grade level or levels, with the exception of existing students,^{1,2} who are guaranteed admission in the following school year.

Lottery Procedures: If a Lottery is necessary, the School will conduct a Lottery during the spring semester before the academic year for which enrollment is sought.

1. Enrolling Current Students: Students currently enrolled in the school at the close of the Open Enrollment period¹ and who have completed the Intent to Return Form are exempt from the lottery and guaranteed admission.

Admission preferences in the case of a public random drawing shall be given to students in the following order:

1. Siblings of students admitted to or attending the School²;
2. Students who are the children of teachers and staff of the School; and
3. Students who reside within the Buckeye Union School District boundaries.

2. Notice about Lottery

Public notice of the Open Enrollment Period and public random drawing rules, deadlines, dates, and times will be communicated in the enrollment applications and on the School's website. A public notice for the date and time of the public random drawing will also be posted once the application deadline has passed. The School will inform parents/guardians of all applicants and all interested parties of the rules to be followed during the public random drawing process via mail or email at least two weeks prior to the lottery date. This information will also be included in application forms. The School will provide sufficient notice to applicants if it finds it necessary to change the Lottery date.

¹ Enrolling Current Students: Students currently enrolled in the school at the close of Open Enrollment Period 1 and who have completed the Intent to Return Form are exempt from the lottery and guaranteed admission.

² Sibling" is defined as an applicant (1) who has at least one biological or adoptive parent in common with an admitted pupil; or (2) who has been legally adopted by or placed under the legal guardianship of at least one biological or adoptive parent of an admitted pupil. Step-siblings are only considered siblings if they reside at the same address as the admitted pupil.

3. Lottery Preferences

There is no weighted priority assigned to most preference categories; rather, students will be drawn from pools beginning with all applicants who qualify for the first preference category and continuing with that preference category until all vacancies have been filled. If there are more students in a preference category than there are spaces available, a random drawing will be held from within that preference category until all available spaces are filled. If all students from the preference category have been selected and there are remaining spaces available, students from the second preference category will be drawn in the lottery, and the drawing shall continue until all spaces are filled and preference categories are exhausted in the order provided above. Students who reside in the District will be grouped with students who reside outside the District, and the former will be given a weighted priority in that drawing.

4. Lottery Procedures

Randomly Drawing Applicants: Admission spaces are pulled by the designated lottery official (appointed by the Executive Director). Unique identifiers will be assigned to each applicant. The lottery will be open to the public, and families are encouraged but not required to attend.

Creation of Lottery Waitlist: Once the enrollment cap has been reached, all students who were not granted admission due to capacity shall be given the option to put their name on a waitlist according to their draw in the lottery. This waitlist will allow students the option of enrolling in the event of an opening during the current school year. In no circumstance will a waitlist carry over to the following school year.

Supporting Siblings: The Board recognizes that schools that serve families are more effective because of the enhanced ability for parents and children to align around a single, unified set of learning and behavioral objectives. If multiple children from the same family apply, the family will be assigned one total number to ensure equity with other applicants. If the family number is pulled, all siblings will be admitted in furtherance of the School's mission to effectively serve families.

5. Notifying Applicants After Lottery

The School will notify applicants who were successfully drawn from the Lottery to offer admission. Following the Lottery, parents/guardians have three business days to confirm the enrollment offer via email. Students who are offered admission at the School at the time of the Lottery will have five business days, or another deadline as may be set by the Executive Director, to complete the registration process. If the Executive Director establishes a different deadline, this deadline will be communicated to families when admission is offered after the Lottery. If a student fails to timely complete the registration process, the spot will be filled from the waitlist, and the student will be presumed to no longer have interest in enrolling with the School.

If a student is offered admission due to one of the preferences noted in this policy and the

School's charter, the School may request supporting documentation as part of the enrollment process. The School will conduct a verification of such documentation before finalizing the student's enrollment and may disqualify an applicant who submitted materially false information. After the Lottery process, and once an offer has been accepted by the family, additional information may be requested as part of the registration process in accordance with applicable law. The School shall not request a pupil's academic records or require the family to submit the pupil's academic records before enrollment in accordance with Education Code Section 47605(e).

Enrollment offers are valid only for the academic year for which the Lottery is conducted. There is no option to defer an offer of enrollment. Students accepting enrollment must generally complete the required independent study agreements within seven (7) days of the beginning of the school year, unless otherwise advised by the School.

6. Master Agreement and Communication

- a. From the original date the Master Agreement was emailed, the parent/guardian/caregiver and student have five school days to sign and complete the document. If, after the fifth school day, the Master Agreement is not signed by both the parent/guardian/caregiver and the student, the student will be disenrolled by the school.
- b. If, after three communication attempts (phone & email) over a period of five school days, the HST has not received communication returned from the parent/guardian/caregiver, the HST will disenroll the student from the school.

Waitlist Management: If a spot becomes available because an accepted student declines enrollment or fails to timely complete the enrollment process, a student leaves the School after the start of the academic year, or as spots become available, the School may notify families on the waitlist in the order they appear on the waitlist.

Students drawn from a waitlist will have three business days to confirm the enrollment offer via email. Students who are offered admission will have five business days, or another deadline as may be set by the Executive Director, to complete the registration process. 10 calendar days, or another deadline as may be set by the Executive Director, to complete the registration process. Applicants must complete the registration process by the deadline given by the School to confirm enrollment.

If a student is offered a spot in writing three times and does not respond or does not complete the application in full with the required enrollment documents by the deadline given, the student shall be removed from the waitlist. Students who did not meet the enrollment document deadline may resubmit an application to the school.

Students who are not offered a spot for the academic school year for which the Lottery was held may remain on the waitlist for that academic year unless the parent or guardian requests that the student be removed from the waitlist earlier.

If there is no waitlist and there is capacity during the school year, School shall admit applicants in accordance with the School's charter petition and applicable law. If School did not conduct a Lottery because spots were available but got oversubscribed during the school year, School should create a waitlist and add students to the waitlist on a first come, first served basis.

School waitlists shall not carry over from one year to the next. Students who have not been admitted will be required to submit a new enrollment application for the next school year and are required to participate in the Lottery if space is limited.

This Policy serves as a technical amendment to Element 8 of the School's charter petition effective for the 2020-21 school year.

