Strong Start Academy

STRONG START ACADEMY ELEMENTARY SCHOOL AT THE TONY HSIEH EDUCATION CENTER

BOARD MEETING AGENDA 09/10/2026

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Date and Time

Thursday September 10, 2026 at 5:00 PM PDT

Location

City Hall, 495 S Main St, 1st floor, Las Vegas, NV 89101

Agenda

		Purpose	Presenter	Time
I.	**Opening Items**			**5:00 PM**
	A. Call the Meeting to Order		Lorna James-Cervantes	3 m
	B. Record Attendance		Lorna James-Cervantes	1 m
	C. Public Comment		Lorna James-Cervantes	3 m

		Purpose	Presenter	Time
	Comment during this portion of the agenda must be limited to matters on the agenda for action. If you wish to be heard, come forward and give your name for the record. The amount of discussion, as well as the amount of time any single speaker is allowed, will be limited to three (3) minutes absent Board approval. Public comment may also be given by calling 1-415-655-0001 and entering access code number 2662 916 4491 followed by the # sign.			
D.	Discussion for possible action to approve Minutes from August 13, 2026 Board meeting.	Vote	Lorna James-Cervantes	1 m
E.	Introduction of new board member, Kristie Cole who was recently approved by the City of Las Vegas City Council.	Vote	Lorna James-Cervantes	2 m

II. Finance — 5:10 PM

A.	Report by Nandini Vaishnav from Vertex Education on Strong Start Academy's financial update, including the FY2026-2027 forecast update through July 2026.	FYI	Nandini Vaishnav	5 m

III. Executive Update — 5:15 PM

A.	Report by the Executive Director on the status of on-going marketing efforts, open-enrollment, and recruiting.	FYI	Miriam Benitez	5 m
B.	Discussion for possible action to approve the updated Student Lottery Policy.	Vote	Miriam Benitez	5 m
C.	Discussion regarding the results of the FY27 Risk Assessment Designation based on data from Fiscal Year 2026 conducted by the Nevada State Public Charter School Authority.	Discuss	Miriam Benitez	5 m
D.	Discussion for possible action to approve Foster Care Policy, McKinney-Vento Policy, and English Learner Policy.	Vote	Miriam Benitez	5 m
E.	Discussion for possible action to approve the 26-27 Annual Written Test Security Notice.	Vote	Miriam Benitez	2 m

		Purpose	Presenter	Time
F.	Discussion for possible action to approve the Read By Grade 3 Local Literacy Plan (LLP).	Vote	Miriam Benitez	5 m
G.	Discussion for possible action to renew the Memorandum of Understanding with S.A.F.E. House to provide services for the prevention of interpersonal violence/domestic violence.	Vote	Miriam Benitez	3 m
H.	Discussion for possible action to review the Fiscal Policies and Procedures Self-Evaluation Checklist, as required by the Nevada State Public Charter School Authority, and approve revisions to the school's fiscal policies and procedures based on the findings of the self-evaluation.	Vote	Miriam Benitez	5 m

IV. Governance — 5:50 PM

A.	Discussion for possible action to review and approve proposed revisions, as necessary, to the Board Policy and Procedure Manual, Code of Ethics, and Bylaws.	Vote	Colleen McCarty	5 m
B.	Discussion and possible action to approve revisions to the previously adopted Governing Board meeting calendar for the 2026–2027 school year.	Vote	Lorna James-Cervantes	5 m

V. Special Reports

VI. Citizens Participation

Public comment during this portion of the agenda must be limited to matters within the jurisdiction of the Board. No subject may be acted upon by the Board unless that subject is on the agenda and is scheduled for action. If you wish to be heard, come forward and give your name for the record. The amount of discussion on any single subject, as well as the amount of time any single speaker is allowed, may be limited. Public comment may also be given by calling 1-415-655-0001 and entering access code number 2662 916 4491 followed by the # sign.

VII. Closing Items

		Purpose	Presenter	Time
A.	Adjourn Meeting	FYI		

Facilities are provided throughout City Hall for the convenience of persons with disabilities.
Reasonable efforts will be made to assist and accommodate persons with disabilities or impairments.
If you need an accommodation to attend and participate in this meeting,
please call Jana Essary at 702-229-3409 and advise of your need at least
48 hours in advance of the meeting. Dial 7-1-1 for Relay Nevada.

THIS MEETING WAS PROPERLY NOTICED AND POSTED AT THE FOLLOWING LOCATIONS IN ACCORDANCE WITH THE NOTICING STANDARDS
AS OUTLINED IN NRS 241.020:
Strong Start Academy Elementary School website www.clvstrongstartes.org
City Hall, 495 S. Main Street, 5th Floor Conference Room, Las Vegas, NV
The Nevada Public Notice website – notice.nv.gov

Coversheet

Discussion regarding the results of the FY27 Risk Assessment Designation based on data from Fiscal Year 2026 conducted by the Nevada State Public Charter School Authority.

Section: III. Executive Update
Item: C. Discussion regarding the results of the FY27 Risk Assessment Designation based on data from Fiscal Year 2026 conducted by the Nevada State Public Charter School Authority.
Purpose: Discuss
Submitted by:
Related Material: 2026-27 SPCSA Risk Assessment Letter -Strong Start.pdf
FY2026-27 CLV Strong Start Risk Assessment Tool.pdf
FY2026-27 Revised RBM Handbook.pdf
FY2026-27 Revised Risk Assessment Guide.pdf

Joe Lombardo
Governor

STATE OF NEVADA

Melissa Mackedon
Executive Director

STATE PUBLIC CHARTER SCHOOL AUTHORITY

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Las Vegas, Nevada 89119-
(702) 486-8895 · Fax (702) 486-5543

Via Electronic Mail

August 7, 2026

Miriam Benitez
CLV Strong Start Academy
310 S 9th Street
Las Vegas, NV 89101
mbenitez@clvstrongstartes.org

Notice of FY2026-27 Risk Assessment Designation

Dear School Leader:

As a pass-through entity of federal funds the State Public Charter School Authority (SPCSA) is required to conduct annual risk assessments of subrecipients in accordance with 2 C.F.R §200.332(b). The SPCSA has completed the annual subrecipient Risk Assessment based on data from Fiscal Year 2025. Below is the risk designation and the type of monitoring determined for your school:

Risk Designation: Low

Type of Monitoring: No Monitoring Required

The Risk Designation is based on the attached Risk Assessment Tool. Please note that the SPCSA has updated both the Risk Assessment Guide and the Risk-Based Monitoring Handbook. The most current versions are attached to this email.

Be advised that this is not an assessment of the quality of your school's grant programming and/or administration, nor is it an indication of your likelihood of receiving future grant awards. Rather, this is a process to determine the type of monitoring and support the SPCSA staff will provide your school to ensure that you have the resources necessary to utilize your grant funding successfully.

Additionally, your school is required to complete the **FY2026–27 Risk-Based Monitoring Fiscal Form** in Monday.com within **30 days** of receiving this letter. The form is based on the risk factors identified in the attached Risk Assessment Tool and is intended to help SPCSA understand the factors contributing to your school's risk results. Responses will be used to determine the focus of the upcoming monitoring visit and identify areas where technical assistance or additional review may be needed. Link to form: https://wkf.ms/4b2pKpN

As your school does not require subrecipient monitoring, you will not receive any additional communication from SPCSA staff regarding this matter. However, if you have any questions or concerns, you can contact the SPCSA subrecipient monitoring team directly at MonitoringandEvaluation@spcsa.nv.gov.

Sincerely,

Selcuk Ozdemir

Dr. Selcuk Ozdemir
Director of Monitoring & Evaluation

SO/DW
Multiple Enclosures

SPCSA Risk Based Monitoring:
Risk Assessment Tool Fiscal Year 2026

Monitoring Focus:

Each year, every school is assessed and assigned a risk level based on a point system. Monitoring requirements are determined by the total number of points and the distribution of those points across the risk areas.

Comprehensive Onsite Monitoring: Schools with a higher number of total points, indicating a high overall risk, will receive a comprehensive onsite visit.

Comprehensive Cyclic Onsite Monitoring: Every charter school receives a comprehensive onsite monitoring visit in the 2nd and 5th year of its charter contract. Outside of these required years, monitoring occurs only if triggered by the school's overall point total.

Targeted Desktop Monitoring: Schools with elevated points in specific areas, but not enough total points to warrant a comprehensive visit, will receive targeted monitoring focused on the particular risk indicators identified through the point system.

School Information:

Name: CLV Strong Start Academy Elementary Schools, Inc.
Address: 495 South Main Street, 5th Floor, Las Vegas, NV 89101

Risk Factor, Criteria and Result:

Point results for risk levels are assigned as follows: 0 points = Low risk, 5 points = Medium risk, 10 points = High risk		Result
Financial Stability	Financial Performance Framework Notices	0
	Federal Title Spend Down for Prior Fiscal Year (FY2024-2025)	0
Management Systems and Standards	Internal Controls and Grant Compliance Policies & Procedures	0
History of Performance	Resolution of Past Corrective Action Plans (CAPs)	0
	Reimbursement Request Quality	5
Audit Reports and Findings	Single Audit Completion and Timeliness	0
	Material Weaknesses or Significant Deficiencies	0
	Audit Findings Related to Fiscal Management	0
Ability to Implement Requirements	Timeliness of Grant Unit Related Fiscal Requirements (Epicenter)	0
Programmatic Performance	Special Education Unresolved Prior Year Corrective Action Plan	0
	CTE NDE Monitoring Unresolved Prior Year Corrective Action Plan	0
	Desktop Monitoring (e.g. Title I-IV, McKinney-Vento and Foster Care)	0
	Required Plan Received (e.g. School Improvement Plan)	0
Low ≤10, Medium >10 and ≤ 20, High >20		5

Type of monitoring to be performed:

- ☐ Comprehensive Onsite Monitoring
- ☐ Comprehensive Cyclic Onsite Monitoring
- ☐ Targeted Desktop Monitoring: ☐ Fiscal/Administrative ☐ Programmatic
- ☑ No Monitoring Required

SPCSA Program Reviewers:	Sara Jorgensen, Jackie Working, Megumi Cramer, Brettani Weinhold, Lidia Sedano, Marinna Cutler	Date:	7/27/2026
SPCSA Fiscal Reviewers:	Kristina Côté, Kristine Myers, Karen Gordon, Deana Wilson, Kimm Rombardo	Date:	7/27/2026

Risk Category	Risk Factor	Risk Level (Low, Medium, High)	Risk Score	Comments/Notes
Finacial Stability: *The applicant's record of effectively managing financial risks, assets, and resources.* **Financial instability increases risk of mismanagement of federal funds.**	Financial Performance Framework Notices	Low: No notice Medium: Notice of Concern High: Notice of Breach	0	
	Federal Title Spend Down for Prior Fiscal Year (FY2024-2025)	Low: Less than 5% Medium: 5-15% High: Over 15%	0	
Management Systems and Standards: *Quality of management systems and ability to meet the management standards.* **Weak systems lead to reporting errors and noncompliance.**	Internal Controls and Grant Compliance Policies & Procedures	Low: Documented, current, and supported by evidence of implementation Medium: Documented but inconsistently implemented or partially outdated High: Missing, outdated, or showing little to no evidence of implementation	0	No items identified (0/37); Fully compliant .
History of Performance: *The applicant's record of managing previous and current Federal awards and conformance to the terms and conditions of Federal awards, if applicable.* **Past performance predicts future risk.**	Resolution of Past Corrective Action Plans (CAPs)	Low: CAP fully resolved Medium: CAP partially resolved High: Unresolved or overdue CAP	0	
	Reimbursement Request Quality	Low: 0-5 revisions Medium: 6-10 revisions High: Over 10 revisions	5	6 RRs returned for revision
Audit Reports and Findings: *Reports and findings from audits performed under subpart F or the reports and findings of any other available audits.* **Audit issues signal systemic problems.**	Single Audit Completion and Timeliness	Low: Audit submitted timely Medium: Audit submitted late but less than 30 days High: Audit not submitted or more than 30 days late	0	
	Material Weaknesses or Significant Deficiencies	Low: No material weaknesses or significant deficiency findings and no repeat findings Medium: No material weakness findings but one or more significant deficiencies and/or repeat significant deficiency findings from prior audits High: Material weaknesses identified and/or repeat material deficiency findings from prior audits	0	
	Audit Findings Related to Fiscal Management	Low: No repeat findings Medium: Finding repeated once High: Same finding repeated in consecutive audits	0	
Ability to Implement Requirements: *The applicant's ability to effectivey implement statutory, or other requirements imposed on recipients of Federal awards.* **Low capacity increases risk of noncompliance.**	Timeliness of Grant Unit Related Fiscal Requirements (Epicenter)	Low: All tasks/reports submitted on/or before the due date Medium: One late submission High: Multiple missing or late submissions	0	
Programmatic Performance: *The applicant's ability to effectivey implement program requirements, deliver services as intended, and achieve performance objectives.* **Weak programmatic performance increases the risk of failing to meet statutory goals, negatively impact beneficiaries and compliance.**	Special Education Unresolved Prior Year Corrective Action Plan	Low: CAP fully resolved High: Unresolved or overdue CAP	0	
	CTE NDE Monitoring Unresolved Prior Year Corrective Action Plan	Low: CAP fully resolved High: Unresolved or overdue CAP	0	
	Desktop Monitoring (e.g. Title I-IV, McKinney-Vento and Foster Care)	Low: All desktop monitoring items turned in. Medium: 5-10% desktop monitoring items missing High: >10% desktop monitoring items missing	0	
	Required Plan Received (e.g. School Improvement Plan)	Low: Plan accepted and implemented Medium: Plan submitted more than 5 days past the due date **AND** required more than 3 revisions High: Plan incomplete or rejected	0	

5

NEVADA STATE PUBLIC CHARTER SCHOOL AUTHORITY
2026-2027 School Year

Risk-Based Monitoring Handbook

A reference for leaders at state-authorized charter schools in Nevada

Nevada State Public Charter School Authority

Carson City Office
3427 Goni Rd, Suite 103 Carson City, NV 89706
775-687-9174

Las Vegas Office
500 E. Warm Springs Road, Suite 116 Las Vegas, NV 89119
702-486-8895

https://charterschools.nv.gov/

Table of Contents

Risk-Based Monitoring Overview 4
Purpose and Applicability 5
Subrecipient Monitoring Guidance and Standards 6
Subrecipient Determination 7
Risk Assessment Process 10
Fiscal Policies and Procedures 10
Risk Indicators 11
Risk Assessment Tool 11
Evaluating Risk 12
Risk Assessment Factors 12
Financial Stability 12
Management Systems and Standards 12
History of Performance 12
Audit Reports and Findings 13
Ability to Implement Requirements 13
Programmatic Performance 13
Risk Assessment Score 13
Low-Risk (≤ 10 points) 13
Medium-Risk (>10 and ≤ 20 points) 14
High-Risk (>20 points) 14
Risk Assessment Tool Example 15
Scheduling and Coordination 17
Pre-Visit Call and Agenda Confirmation 17
Purpose of Monitoring Activities 19
Types of Monitoring 19
Comprehensive Onsite Monitoring – High-Risk Subrecipients 19
Comprehensive Cyclic Onsite Monitoring – Required in Years 2 and 5 20
Targeted Virtual/Desktop Monitoring – Medium-Risk Subrecipients 20

No Monitoring – Low-Risk Subrecipients 20
Programmatic and Fiscal Monitoring Components 21
Monitoring Report Development 22
Corrective Action Plan (CAP) Process 23
Developing the Corrective Action Plan 23
Submission Requirements 23
Evidence of Resolution 23
Revisions and Final Determination 24
Repercussions of Failing to Submit a Corrective Action Plan or Required Evidence 24
Federal Remedies for Noncompliance (2 C.F.R. § 200.339) 24
Resolution of Corrective Action Plans 24
Closing Remarks and Contact Information 26
Appendices 27
Appendix A: SPCSA Resources – Canvas Repository 27
Appendix B: Federal Resources 27
Appendix C: SPCSA School Performance Reports 28

Risk-Based Monitoring Overview

This guide outlines the protocols that the State Public Charter School Authority (SPCSA) must follow when monitoring subrecipients that receive federal funds through SPCSA-awarded subgrants. As a pass-through entity, the SPCSA receives federal funds and issues sub-awards to SPCSA-sponsored charter schools, which are considered subrecipients under 2 C.F.R. Part 200.

In accordance with 2 C.F.R. §§ 200.331–200.332, the SPCSA is responsible for establishing, implementing, and documenting a risk-based monitoring system to ensure that subrecipients comply with all applicable federal statutes, regulations, and the terms and conditions of their awards. This includes oversight of fiscal management, internal controls, allowable use of funds, program performance, and reporting requirements.

The SPCSA is federally required to evaluate each subrecipient's risk of noncompliance and provide oversight proportionate to that level of risk. This may include technical assistance, desk reviews, onsite monitoring, or other monitoring activities as appropriate.

Under 2 C.F.R. § 200.303 (Internal Controls) and § 200.332 (Requirements for Pass-Through Entities), SPCSA must ensure that subrecipients use federal funds only for authorized purposes, safeguard public resources, maintain effective internal controls, and comply with all applicable federal laws, regulations, and award requirements.

Effective oversight is essential to protecting taxpayer dollars, promoting accountability, identifying compliance issues early, and ensuring that federally supported programs achieve their intended outcomes.

Purpose and Applicability

This manual serves as a foundational guide for fulfilling the responsibilities of the SPCSA in its role as both a grantor and a pass-through entity. Its primary purpose is to provide a standardized framework for monitoring programs supported by Federal and State funds. These funds are awarded to subrecipients with the expectation that all applicable requirements—programmatic, fiscal, administrative, and performance-related—are met. To ensure this, the SPCSA must conduct thorough and consistent oversight aligned with governing statutes, regulations, and grant conditions.

This manual establishes a consistent framework for conducting Risk-Based Monitoring across all SPCSA-sponsored charter schools. It provides structured guidance for developing and implementing monitoring activities tailored to each subrecipient's level of risk. The framework defines minimum monitoring expectations, identifies required documentation, and outlines procedures for assessing compliance, evaluating performance, and verifying the effective stewardship of federal funds. By standardizing these practices, the SPCSA promotes consistency, transparency, equitable oversight, and continuous improvement across all subrecipients.

In accordance with 2 C.F.R. § 200.332(b), pass-through entities are required to evaluate each subrecipient's risk of noncompliance to determine the appropriate level and type of monitoring. As a pass-through entity, the SPCSA must ensure that subrecipients adhere to all applicable federal requirements, the terms and conditions of their awards, and the performance expectations established by both Federal and State authorities. To meet these responsibilities, the SPCSA conducts programmatic and fiscal reviews designed to assess how effectively subrecipients implement their funded programs, manage grant resources, and achieve the intended outcomes, objectives, and performance benchmarks outlined in the grant awards.

Subrecipient Monitoring Guidance and Standards

The SPCSA oversees Federal and State programs and ensures that funds are used in accordance with all applicable statutes, regulations, and financial reporting requirements. This oversight includes monitoring subrecipients who receive grant funds through SPCSA-awarded subgrants. As part of this responsibility, subrecipients must establish and maintain effective internal controls to track the receipt, disbursement, and reconciliation of grant funds, consistent with the standards outlined in 2 C.F.R. § 200.303. These internal controls are essential for ensuring proper stewardship of public funds, preventing misuse, and supporting accurate financial and performance reporting. Subrecipients are also expected to implement systems that allow them to identify risks, detect potential noncompliance, and ensure that federal award requirements are met throughout the period of performance.

Monitoring is the process used to evaluate and ensure that subrecipients comply with the requirements of federally funded programs and adhere to all applicable laws, regulations, and grant conditions. This requirement is outlined in 2 C.F.R. § 200.332(d), which mandates ongoing oversight to ensure compliance and performance. Monitoring also assesses progress toward stated objectives and programmatic goals, as required by 2 C.F.R. § 200.301.

During monitoring activities, SPCSA personnel review documentation, records, and other relevant information maintained by the subrecipient, as well as data obtained through interviews, prior monitoring activities, and Epicenter submissions. This analysis helps assess compliance with federal requirements, identify potential risks, verify implementation of required controls, and determine whether corrective action is warranted under 2 C.F.R. § 200.339. Monitoring also evaluates whether the subrecipient maintains adequate financial management and accounting systems to properly safeguard federal funds, as required by 2 C.F.R. § 200.302.

Pass-Through Entity Responsibilities

In its role as a pass-through entity under 2 C.F.R. § 200.332, the SPCSA must:

- Conduct oversight throughout the period of performance to ensure compliance.
- Evaluate each subrecipient's risk of noncompliance using tools such as the annual Risk Assessment Tool.
- Ensure accurate financial and performance reporting consistent with 2 C.F.R. § 200.301.
- Ensure compliance with all federal statutes, regulations, and award conditions.
- Review Single Audit results and assess findings for material weaknesses, significant deficiencies, or repeated issues.
- Impose conditions or corrective actions when necessary, as outlined in 2 C.F.R. §§ 200.208 and 200.339.

- Provide technical assistance, guidance, and training to support compliance.
- Ensure that only qualified and responsible subrecipients receive federal awards.

Subrecipient Responsibilities

Under 2 C.F.R. Part 200, subrecipients are required to:

- Adhere to all award requirements, laws, regulations, and SPCSA grant conditions.
- Establish, document, and maintain effective internal controls aligned with 2 C.F.R. § 200.303.
- Collect, maintain, and submit required programmatic and fiscal data.
- Develop, implement, and update written fiscal and programmatic policies and procedures for approval of expenditures.
- Maintain documentation demonstrating allowability, allocability, reasonableness, and proper authorization of expenditures.
- Submit program and fiscal data on a timely basis, including budgets, reimbursement requests, Epicenter submissions, and required plans such as the School Improvement Plan.
- Ensure compliance with audit requirements, including Single Audits (if applicable), and complete follow-up on audit findings.
- Monitor risk internally, identify potential noncompliance, and implement corrective actions proactively.

Monitoring Methods

The SPCSA uses a variety of methods to monitor subrecipient activities, which may include:

- Review of Single Audit results and corrective action follow-up
- Comprehensive onsite visits or cyclic onsite visits, based on risk scoring
- Targeted virtual/desktop monitoring of specific fiscal or programmatic risk indicators
- Review of fiscal policies, procedures, and internal controls
- Review of programmatic documentation, including implementation plans and student-level support documentation
- Required technical assistance or targeted training
- Interviews or surveys of school leadership and staff to assess internal capacity

Subrecipient Determination

The SPCSA, as a pass-through entity, is responsible for determining whether each entity receiving federal funds is acting as a subrecipient or a contractor, as required by 2 C.F.R. § 200.331. This classification determines the applicable compliance requirements and the level of risk-based monitoring the SPCSA must conduct.

A subaward is provided for the purpose of carrying out a portion of a federal award, thereby establishing a federal assistance relationship between the SPCSA and the subrecipient. Once designated as a subrecipient, the entity is responsible for:

• Using federal funds only for authorized purposes and in accordance with all programmatic, federal, and state requirements
• Maintaining documentation, internal controls, and fiscal processes that support allowability and proper allocation of expenditures
• Complying with audit requirements, including Single Audit responsibilities when applicable
• Responding to monitoring requests and implementing Corrective Action Plans (CAPs) when required

The SPCSA evaluates the nature of the funding relationship to determine whether an entity should be classified as a subrecipient. An entity is generally considered a subrecipient when it:

1. Determines eligibility for individuals or groups to receive federal assistance
2. Uses programmatic performance measures to evaluate success in meeting federal program objectives
3. Makes programmatic decisions necessary to operate or implement components of the federal program
4. Is responsible for compliance with federal statutes, regulations, and the terms and conditions of the federal award
5. Uses federal funds to carry out a program for a public purpose rather than providing goods or services for the direct benefit of the pass-through entity

No single factor is determinative. SPCSA staff must use professional judgment, supported by documentation, to make and justify each classification.

Risk Evaluation of Subrecipients

Once an entity is determined to be a subrecipient, the SPCSA evaluates its annual risk using the criteria represented in the Risk Assessment Tool, which considers:

• Financial stability (e.g., spend-down patterns and financial notices)
• Management systems and internal controls
• History of performance, including CAP resolution and reimbursement accuracy
• Audit results, including timely Single Audit submissions and any material weaknesses or repeated findings
• Ability to implement requirements, including timeliness of Epicenter submissions
• Programmatic performance, including Special Education CAPs, desktop monitoring results, and required plan submissions

These factors determine each subrecipient's overall risk level (low, medium, or high) and the corresponding monitoring method (comprehensive onsite, targeted virtual/desktop, cyclic, or no monitoring).

This process ensures that SPCSA's monitoring obligations under 2 C.F.R. § 200.332—including oversight, communication of requirements, and follow-up on findings—are met in a consistent and risk-informed manner.

Risk Assessment Process

As pass-through entities, agencies expending federal funds are required under 2 C.F.R. § 200.332 to evaluate each subrecipient's risk of noncompliance with federal statutes, regulations, and the terms and conditions of their subaward. This evaluation determines the level and type of monitoring necessary for each subrecipient.

Analyzing subrecipient risk is essential for allocating monitoring resources effectively. By identifying entities with a higher likelihood of noncompliance, the SPCSA can concentrate oversight where it is most needed, improving decision-making and reducing unnecessary monitoring burden.

Fiscal Policies and Procedures

To support the annual Risk Assessment conducted each summer, the SPCSA collects updated fiscal policies and procedures from all subrecipients during the spring via an Epicenter task. These documents must align with 2 C.F.R. Part 200 and include the seven fiscal topics required by the SPCSA:

1. Internal Controls
2. Allowability of Costs
3. Accounting and Financial Management System
4. Procurement System
5. Audit Resolution
6. Inventory Management
7. Records Retention

The SPCSA reviews these documents annually to assess the strength of subrecipients' internal controls and determine each subrecipient's overall risk level for the upcoming monitoring cycle. This process ensures that fiscal management practices remain current, compliant with federal requirements, and responsive to organizational or personnel changes.

To support schools in developing compliant fiscal policies and procedures, the SPCSA provides resources and guidance, including the Risk-Based Monitoring Repository available in Canvas. Failure to submit fiscal policies and procedures by the assigned deadline may result in a high-risk designation. Submitted documents are reviewed for compliance, and if revisions are required, schools will have fourteen (14) days to submit updated materials. Failure to revise within the allotted timeframe may result in the original risk factor remaining unchanged. Schools that submit revisions within the timeframe will have their materials re-reviewed, and risk designations may be adjusted based on updated documents.

Risk Indicators

A risk-based approach to monitoring is required under 2 C.F.R. § 200.332(b). Each year, the SPCSA evaluates the risk of noncompliance for every subrecipient using:

1. Uniform Guidance factors required under 2 C.F.R. § 200.332(b)
2. Additional SPCSA-specific indicators shown to predict fiscal, administrative, or programmatic noncompliance

When evaluating a subrecipient's risk of noncompliance, SPCSA considers the following federally required factors:

1. Prior experience with similar federal subawards
2. Audit results, including Single Audit status and whether similar programs were audited as major programs
3. Extent and results of federal monitoring conducted by awarding agencies, when applicable

Risk Assessment Tool

Each year, the SPCSA conducts a comprehensive Risk Assessment to determine the level of monitoring, support, and technical assistance each subrecipient will receive. This process is guided by federal requirements under Uniform Guidance (2 C.F.R. Part 200), including 2 C.F.R. § 200.332(d), which mandates evaluation of subrecipient risk.

To meet these requirements, the SPCSA uses a structured, point-based Risk Assessment Tool that evaluates several core dimensions:

- Financial stability
- Internal controls
- Past performance
- Audit results
- Organizational capacity
- Programmatic performance

These categories align directly with federal expectations for assessing a subrecipient's ability to comply with statutes, regulations, and award conditions.

Because subrecipient conditions change over time, the Risk Assessment is conducted annually. This ensures alignment with current federal regulations and allows SPCSA to adjust monitoring strategies in response to emerging risk trends or operational changes within organizations.

The Risk Assessment Tool identifies strengths and areas of concern, recognizing strong internal controls, sound fiscal management, and effective program implementation. It provides a structured, data-driven evaluation of each subrecipient's fiscal health, operational capacity, internal controls, and programmatic performance.

The process also allows SPCSA to identify shifts in risk levels year-over-year, helping tailor monitoring, technical assistance, and support to each subrecipient's evolving needs.

Evaluating Risk

Once the assessment is complete, each subrecipient is assigned a risk level of **Low**, **Medium**, or **High**, based on total points earned across each category. These classifications determine the type and intensity of monitoring required:

- **High-risk:** Receive in-depth onsite monitoring to strengthen internal controls, verify reporting accuracy, and ensure compliance
- **Medium-risk:** Receive targeted virtual monitoring focused on identified areas of concern
- **Low-risk:** Do not receive monitoring for the assessment year but continue with routine submissions, desktop checks, and periodic oversight

Ultimately, the risk assessment process ensures monitoring efforts are fair, consistent, and responsive to each subrecipient's unique circumstances. This allows SPCSA to allocate resources effectively, support compliance, safeguard federal funds, and help subrecipients provide high-quality services to students and families.

Risk Assessment Factors

The Risk Assessment Tool evaluates each subrecipient across five major categories, consistent with 2 C.F.R. § 200.206(b)(2). Each category contains specific indicators tied to Low, Medium, or High-risk levels. Together, these indicators determine the overall risk score and the corresponding level of monitoring required.

Financial Stability

Assesses the subrecipient's financial performance and prior use of federal funds.
Indicators include:

- Financial Performance Framework Notices
- Federal Title spend-down for the prior fiscal year

Management Systems and Standards

Evaluates the strength and reliability of internal controls and grant-related procedures.
Indicator includes:

- Internal Controls and Grant Compliance Policies and Procedures

History of Performance

Assesses prior compliance with grant requirements and responsiveness to oversight actions.
Indicators include:

- Resolution of past Corrective Action Plans (CAPs)
- Reimbursement request accuracy and number of revisions

Audit Reports and Findings

Analyzes Single Audit results and other audit activities.
Indicators include:

- Single Audit completion and timeliness
- Material weaknesses or significant deficiencies
- Audit findings related to fiscal management

Ability to Implement Requirements

Assesses operational capacity and the timeliness of required submissions.
Indicator includes:

- Timeliness of grant-unit-related fiscal requirements (Epicenter submissions)

Programmatic Performance

Evaluates the subrecipient's ability to meet program expectations and implement required services.
Indicators include:

- Special Education prior-year CAP status
- CTE NDE Monitoring prior-year CAP status
- Desktop monitoring results (Title I–IV, McKinney-Vento, Foster Care)
- Submission of required plans (e.g., School Improvement Plan)

The assessment also considers changes that may affect a subrecipient's risk level. Examples include emerging financial concerns, turnover of key personnel, or the addition of new programs or services. By evaluating these elements consistently, the SPCSA ensures that all subrecipients are assessed fairly and that potential risks are identified and addressed promptly.

Risk Assessment Score

The Risk Assessment score comes directly from the risk assessment tool and is based on the sum of each risk factor as noted on the Risk Assessment Tool.

Low-Risk (≤ 10 points)

Schools scoring 10 points or fewer are considered low-risk and do not receive monitoring for the fiscal year.

- Continue routine Epicenter submissions and required annual assessments
- May still receive Comprehensive Cyclic Onsite Monitoring if in Year 2 or Year 5 of the charter term

However, if a school receives a Low-Risk Designation and there are specific risk factor scores indicating areas of noncompliance that must be addressed, the SPCSA will follow up with your school regarding these items to support achieving full compliance with 2 C.F.R. requirements.

Medium-Risk (>10 and ≤ 20 points)

Schools scoring more than 10 but no more than 20 points receive **Targeted Virtual/Desktop Monitoring**, focused only on the specific areas of concern identified in the assessment.

- Monitoring activities target the risk factors contributing to the score
- Schools participate in document reviews, virtual meetings, clarification requests, and follow-up actions

High-Risk (>20 points)

Schools scoring above 20 points are designated high-risk and receive **Comprehensive Onsite Monitoring**, which includes an in-depth review of fiscal, administrative, and programmatic systems.

- Monitoring includes onsite interviews, document sampling, policy review, and analysis of internal controls
- Additional technical assistance may be provided as needed to address identified risks

Risk Assessment Tool Example

The Risk Assessment Tool evaluates individual risk factors based on established criteria. Each factor is assigned a point value reflecting the level of risk identified. Scores are combined to determine the school's overall Risk Assessment Score.

SPCSA Risk Based Monitoring:
Risk Assessment Tool Fiscal Year 2026

Monitoring Focus:

Each year, every school is assessed and assigned a risk level based on a point system. Monitoring requirements are determined by the total number of points and the distribution of those points across the risk areas.
Comprehensive Onsite Monitoring: Schools with a higher number of total points, indicating a high overall risk, will receive a comprehensive onsite visit.
Comprehensive Cyclic Onsite Monitoring: Every charter school receives a comprehensive onsite monitoring visit in the 1st and 5th year of its charter contract. Outside of these required years, monitoring occurs only if triggered by the school's overall point total.
Targeted Desktop Monitoring: Schools with elevated points in specific areas, but not enough total points to warrant a comprehensive visit, will receive targeted monitoring focused on the particular risk indicators identified through the point system.

School Information:

Name:
Address

Risk Factor, Criteria and Result:

Point results for risk levels are assigned as follows: 0 points = Low risk, 5 points = Medium risk, 10 points = High risk		**Result**
Financial Stability	Financial Performance Framework Notices	0
	Federal Title Spend Down for Prior Fiscal Year (FY2024-2025)	0
Management Systems and Standards	Internal Controls and Grant Compliance Policies & Procedures	0
History of Performance	Resolution of Past Corrective Action Plans (CAPs)	0
	Reimbursement Request Quality	0
Audit Reports and Findings	Single Audit Completion and Timeliness	0
	Material Weaknesses or Significant Deficiencies	0
	Audit Findings Related to Fiscal Management	0
Ability to Implement Requirements	Timeliness of Grant Unit Related Fiscal Requirements (Epicenter)	0
Programmatic Performance	Special Education Unresolved Prior Year Corrective Action Plan	0
	CTE NDE Monitoring Unresolved Prior Year Corrective Action Plan	0
	Desktop Monitoring (e.g. Title I-IV, McKinney-Vento and Foster Care)	0
	Required Plan Received (e.g. School Improvement Plan)	0
Low ≤10, Medium >10 and ≤ 20, High >20		0
Type of monitoring to be performed:	☐ Comprehensive Onsite Monitoring ☐ Comprehensive Cyclic Onsite Monitoring ☐ Targeted Desktop Monitoring ☐ Fiscal/Administrative ☐ Programmatic ☐ No Monitoring Required	

SPCSA Program Reviewer: _____ Date: _____

SPCSA Fiscal Reviewer: Date:

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These points correspond to the degree of concern associated with each criterion and are used to calculate the total Risk Assessment Score for the fiscal year. The scoring enables the SPCSA to identify areas of potential noncompliance and determine the appropriate level of monitoring and technical assistance.

Fiscal Risk Factor, Criteria and Results:

	Risk Factor	Risk Level (Low, Medium, High)
Financial Stability The school's record of effectively managing financial risks, assets, and resources. **Financial instability increases risk of mismanagement of ferderal funds.**	Financial Performance Framework Notices	Low: No notice Medium: Notice of Concern High: Notice of Breach
	Federal Title Spend Down for Prior Fiscal Year (FY2024-2025)	Low: Less than 5% Medium: 5-15% High: Over 15%
Management Systems & Standards Quality of management systesms and ability to meet the management standards. **Weak systems lead to reporting errors and non compliance.**	Internal Controls and Grant Compliance Policies & Procedures	Low: Documented, current, and supported by evidence of implementation Medium: Documented but inconsistently implemented or partially outdated High: Missing, outdated, or showing little to no evidence of implementation
History of Performance The school's record of managing previous and current Federal awards and conformance to the terms and conditions of Federnal awards, if applicab;e. **Past performance predicts future risks.**	Resolution of Past Corrective Action Plans (CAPs)	Low: CAP fully resolved Medium: CAP partially resolved High: Unresolved or overdue CAP
	Reimbursement Request Quality	Low: 0-5 revisions Medium: 6-10 revisions High: Over 10 revisions
Audit Reports and Findings Reports and findings from audits performed under subpart F or the reports and findings of any other available audit. **Audit issues signal systemic problems.**	Single Audit Completion and Timeliness	Low: Audit submitted timely Medium: Audit submitted late but less than 30 days High: Audit not submitted or more than 30 days late
	Material Weaknesses or Significant Deficiencies	Low: No material weaknesses or significant deficiency findings and no repeat findings Medium: No material weakness findings but one or more significant deficiencies and/or repeat significant deficiency findings from prior audits High: Material weaknesses identified and/or repeat material deficiency findings from prior audits
	Audit Findings Related to Fiscal Management	Low: No repeat findings Medium: Finding repeated once High: Same finding repeated in consecutive audits
Ability to Implement Requirements The school's ability to effectivelty implement statutory, or other requirements imposed or reciepients of Federal awards. **Low capacity increases risk of non compliance.**	Timeliness of Grant Unit Related Fiscal Requirements (Epicenter)	Low: All tasks/reports submitted on/or before the due date Medium: One late submission High: Multiple missing or late submissions

Program Risk Factor, Criteria and Result:

Programmatic Performance The school's ability to effectively implement program requirements, deliever services as intended, and achieve performance objectives. **Weak programmatic performance increases the risk of failing to meat statutory goals, negativelu impact beneficiaries and compliance.**	Special Education Unresolved Prior Year Corrective Action Plan	Low: CAP fully resolved High: Unresolved or overdue CAP
	CTE NDE Monitoring Unresolved Prior Year Corrective Action Plan	Low: CAP fully resolved High: Unresolved or overdue CAP
	Desktop Monitoring (e.g. Title I-IV, McKinney-Vento and Foster Care)	Low: All desktop monitoring items turned in. Medium: 5-10% desktop monitoring items missing High: >10% desktop monitoring items missing
	Required Plan Received (e.g. School Improvement Plan)	Low: Plan accepted and implemented Medium: Plan submitted more than 5 days past the due date **AND** required more than 3 revisions High: Plan incomplete or rejected

Scheduling and Coordination

Once the SPCSA completes its annual risk assessments and determines the required level and type of monitoring for each school, the Subrecipient Monitoring Coordinator will schedule visits based on the established monitoring hierarchy. Monitoring types identified in the SPCSA Risk Assessment Tool include **Comprehensive Onsite Monitoring**, **Comprehensive Cyclic Onsite Monitoring**, and **Targeted Virtual/Desktop Monitoring**. Consistent with SPCSA's commitment to efficient and risk-responsive oversight, onsite monitoring visits are prioritized. After onsite visits are scheduled, SPCSA will schedule targeted virtual/desktop monitoring as appropriate.

To initiate the scheduling process, SPCSA staff will prepare a detailed memo on official SPCSA letterhead and send it to both the school leader and the board chair via email. Subrecipients must maintain accurate and up-to-date contact information to ensure timely receipt of essential communications.

All monitoring visits—onsite and virtual—are scheduled to occur between **October and February**. When confirming dates, subrecipients should review their calendars to avoid conflicts with testing schedules, school breaks, holidays, or other major events. This practice ensures that monitoring activities align smoothly with each school's operational schedule.

If a school is also scheduled for a site evaluation visit, the SPCSA will coordinate both the site evaluation and monitoring visit on the same day whenever possible. This approach minimizes disruption and reduces the need for multiple accommodations by both SPCSA staff and the school.

Pre-Visit Call and Agenda Confirmation

Prior to a scheduled onsite monitoring visit, SPCSA will conduct a **Pre-Visit Call** to establish and confirm the agenda for the upcoming visit. During this call, SPCSA staff and school leadership will review the agenda template and make adjustments as needed to accommodate the school's scheduling needs.

The agenda typically includes:

- SPCSA staff arrival time
- Welcome and introductions
- A school walkthrough
- Fiscal, administrative, and/or program monitoring sessions
- A debrief to discuss strengths, recommendations, and any areas of noncompliance that may result in a Corrective Action Plan (CAP)

During the Pre-Visit Call, SPCSA will also introduce the staff responsible for conducting monitoring and identify the school personnel who must be present for each portion of the visit. Any required pre-visit

materials will be discussed, and schools will have the opportunity to ask questions about the monitoring process.

Combined Pre-Visit Call for Schools with Site Evaluations

If a school is also scheduled for a site evaluation, SPCSA will combine the monitoring and site evaluation Pre-Visit Call to minimize disruptions and reduce the number of required meetings. In such cases, SPCSA will integrate both schedules to avoid conflicts and streamline planning for the school and SPCSA staff.

Purpose of Monitoring Activities

Monitoring is a core component of the SPCSA's oversight responsibilities and is designed to ensure that subrecipients comply with federal requirements, maintain sound fiscal practices, and effectively implement grant-funded programs. Before conducting any monitoring activities, the SPCSA uses annual Risk Assessment results to determine which schools require monitoring and the appropriate type of monitoring. Each monitoring approach is intentionally structured around the specific areas of risk identified for the school, ensuring a focused, consistent, and comprehensive review process.

Monitoring activities may include onsite visits, targeted desktop reviews, fiscal monitoring, programmatic monitoring, and follow-up communication with school staff. The purpose of all monitoring, whether comprehensive or targeted, is to verify compliance, identify areas for improvement, and support schools in strengthening internal controls and developing effective systems.

Types of Monitoring

The SPCSA engages in continuous monitoring to ensure that subrecipients adhere to written grant requirements, implement approved activities, meet program objectives, and comply with state and federal regulations. As part of this oversight, SPCSA staff may visit subrecipients in person to verify that grant-funded activities are being implemented as designed, internal controls are functioning effectively, and federal funds are being properly managed. Effective monitoring protects against fraud, waste, and abuse and supports the integrity of SPCSA pass-through funds, consistent with 2 C.F.R. § 200.332(b).

Comprehensive Onsite Monitoring – High-Risk Subrecipients

Comprehensive onsite monitoring is the most in-depth form of monitoring conducted by the SPCSA. Schools identified as **High-Risk** through the annual Risk Assessment receive a comprehensive onsite visit due to an elevated likelihood of noncompliance.
During these onsite reviews, SPCSA staff conduct a cross-cutting examination of the school's fiscal, administrative, and programmatic operations. This includes verification of:

- compliance with federal and state requirements,
- allowability and proper use of grant funds,
- strength and reliability of internal controls, and
- alignment of expenditures and activities with approved grant plans.

This level of monitoring helps ensure the school has the capacity, internal systems, and documentation needed to meet all program requirements.

Comprehensive Cyclic Onsite Monitoring – Required in Years 2 and 5

All SPCSA-sponsored charter schools receive a Comprehensive Cyclic Onsite Monitoring visit during the **2nd** and **5th** year of their charter contract, regardless of annual risk score. Outside of these years, schools are monitored only if their risk score requires it.

Cyclic visits provide periodic, full-scope oversight during critical phases of the charter term and follow the same structure as Comprehensive Onsite Monitoring.

Targeted Virtual/Desktop Monitoring – Medium-Risk Subrecipients

Schools that score above the Low-Risk threshold but do not meet High-Risk criteria receive **Targeted Virtual/Desktop Monitoring**. This level of monitoring focuses specifically on the risk indicators identified in the Risk Assessment Tool, such as:

- internal controls,
- late submissions,
- audit findings,
- fiscal management concerns, or
- program-specific issues

Targeted monitoring is conducted through virtual meetings, remote document reviews, Epicenter submissions, and follow-up communication with SPCSA staff. These sessions review medium-risk factors in detail, assess current practices, and determine whether corrective actions or additional documentation are needed.

The goal of targeted monitoring is not only to verify compliance but to strengthen internal practices, improve program implementation, and reduce future risk.

No Monitoring – Low-Risk Subrecipients

Schools identified as **Low-Risk** through the annual Risk Assessment are not required to participate in monitoring during that fiscal year. These schools demonstrate strong internal controls, timely and complete submissions, compliant audits, and resolved corrective actions.
Even without monitoring, Low-Risk schools remain subject to:

- annual risk assessments,
- routine desktop oversight through required Epicenter submissions, and
- possible selection for future monitoring if risk levels increase.

Subrecipients deemed Low-Risk may still receive Comprehensive Cyclic Onsite Monitoring in Years 2 and 5 of the charter term. If new concerns arise through routine oversight, additional monitoring may be scheduled in future years.

Programmatic and Fiscal Monitoring Components

Regardless of monitoring type, SPCSA reviews both **programmatic** and **fiscal** elements.

Programmatic monitoring ensures that grant-funded activities align with the school's approved implementation plan and support program goals, statutory requirements, and performance expectations.

Fiscal monitoring includes review of fiscal policies and procedures, financial reports, accounting practices, internal controls, and allowability of grant expenditures. This ensures compliance with federal cost principles and promotes responsible stewardship of public funds.

Comprehensive onsite visits include both components, while targeted monitoring focuses on the specific programmatic or fiscal areas where risk was identified.

Monitoring Report Development

Following completion of an onsite monitoring visit, the SPCSA monitoring team will document their observations and findings in a comprehensive written monitoring report. This report provides an overview of the subrecipient's internal controls, strengths, recommendations, and any issues identified during the visit. Each observation is clearly described, including the context in which it was noted and its potential impact on the subrecipient's operations.

Issues identified during monitoring will be categorized as **Areas of Noncompliance**, outlining specific requirements that were not met. For each area of noncompliance, the report will identify the applicable regulatory or contractual requirement and provide tailored recommendations for corrective actions to assist the subrecipient in achieving full compliance.

The monitoring report will:

- Identify subrecipient information and programs monitored
- Describe the monitoring activities performed
- Summarize SPCSA staff observations, including strengths, weaknesses, and concerns
- Describe the criteria used for collecting information and reference applicable federal and/or state requirements
- Identify corrective action items and the due date for the Corrective Action Plan (CAP)
- Identify the appropriate recipient and instructions for submitting the Corrective Action Plan

The report may also include requirements related to updating or revising policies and procedures, correcting data, or completing additional training needed by school staff. The school leader and board chair will receive copies of the monitoring report, and the school leader may share it with relevant staff members to address areas of noncompliance.

Timeline and Review

SPCSA staff will issue the preliminary monitoring report and accompanying letter as promptly as possible. If delays occur, the Subrecipient Monitoring Coordinator will notify the school.
Within **fourteen (14) business days** of the monitoring visit, SPCSA monitoring staff will complete the preliminary monitoring report and produce a report letter outlining next steps.

Upon receiving the report letter, the subrecipient will have **seven (7) days** to provide corrections or identify inaccuracies. This response must be submitted on official school letterhead. If SPCSA receives a timely response, the preliminary report will be updated to include the subrecipient's submission before the final report is issued.

If no response is received within seven days, the final report will be issued without amendments.
For schools that receive a combined Monitoring and Site Evaluation visit, reports will be consolidated and published on the SPCSA website for public viewing.

Corrective Action Plan (CAP) Process

When instances of noncompliance are identified during monitoring, the SPCSA initiates a **Corrective Action Plan (CAP)**. The CAP is a formal tool designed to help subrecipients address identified financial, administrative, or programmatic deficiencies through a structured remediation plan. When noncompliance is identified, the Subrecipient Monitoring Coordinator provides a CAP template outlining the specific areas requiring corrective action.

The CAP serves as a written record of the issues identified and outlines the actions needed to bring the subrecipient into compliance. It documents the concerns, root causes, and recommended corrective steps or activities necessary to address each issue.

Developing the Corrective Action Plan

Subrecipients must respond promptly by developing a detailed plan that includes:

- The specific steps that will be taken to correct each area of noncompliance
- The individuals responsible for completing each action
- A clearly defined timeline for completion

Once the CAP is reviewed and accepted by SPCSA staff, it is sent via DocuSign for formal acknowledgment. Both the school leader and designated board chair must sign the CAP, confirming their commitment to overseeing the corrective actions.

Submission Requirements

To ensure timely resolution of noncompliance, subrecipients must upload their CAP to the designated Epicenter task **within 30 days** of receiving the preliminary monitoring report. Timely submission supports an efficient review process and prevents delays in resolving the findings.

Upon submission, SPCSA monitoring staff review the CAP to ensure it fully addresses all identified issues and meets compliance expectations. Within **10 business days**, SPCSA will update the CAP log indicating whether the CAP is accepted or requires revision. Subrecipients are encouraged to allow adequate time to develop a complete and thorough plan, as insufficient CAPs may delay acceptance.

Evidence of Resolution

Once the CAP is formally approved, the school leader and applicable staff must submit evidence demonstrating that every finding has been fully resolved. This evidence may include updated policies, revised procedures, corrected data, documentation, or other materials verifying remediation. Evidence must be submitted to the designated Epicenter task **within 30 calendar days** of CAP approval. SPCSA monitoring staff review all submitted documentation to verify that each corrective action has been satisfied. If any item remains incomplete or does not meet requirements, the school will be notified and must submit revised evidence by the specified deadline.

Revisions and Final Determination

If the CAP is not accepted, SPCSA will notify the school leader through an Epicenter task indicating the deficiencies and required revisions. The school must submit a revised CAP within **fourteen (14) days**. Once the revised CAP is accepted, it follows the same evidence submission and review process described above.

After all corrective actions are verified as complete, SPCSA issues a **Fully Resolved CAP Letter** to the school leader and charter board chair, formally closing the CAP.

Repercussions of Failing to Submit a Corrective Action Plan or Required Evidence

Failure to submit a Corrective Action Plan (CAP), a CAP revision, or required evidence by established deadlines will result in escalating notices:

- **Second Notice:** The subrecipient must submit all requested documentation within five (5) days. If the school does not comply, SPCSA will issue a final notice.
- **Third and Final Notice:** The subrecipient must submit all required documentation within three (3) days.

Failure to meet the final deadline will prompt the SPCSA leadership team to make a management decision and determine appropriate remedies for noncompliance. These actions may include, but are not limited to, termination of the grant award.

Federal Remedies for Noncompliance (2 C.F.R. § 200.339)

If noncompliance cannot be remedied by imposing additional conditions under 2 C.F.R. § 200.208, federal awarding agencies may take one or more of the following actions:

i. Temporarily withhold cash payments until deficiencies are corrected.
ii. Disallow all or part of the cost of the activity or action not in compliance.
iii. Suspend or terminate the award, in whole or in part.
iv. Initiate suspension or debarment proceedings.
v. Withhold future federal awards for the project or program.
vi. Take any other remedies legally available.

Resolution of Corrective Action Plans

If a subrecipient fails to fully resolve all CAP items by the established deadline, the school is automatically designated **High-risk** for the upcoming year under the *History of Performance* category. This designation requires the school to address unresolved areas of noncompliance from the prior year, as well as any new issues identified during the current monitoring cycle.

Schools with a High-risk designation must take immediate, comprehensive corrective action to ensure compliance and mitigate risk. This requirement applies to both **Targeted Virtual/Desktop Monitoring** and **Comprehensive Onsite Monitoring**.

Schools should also be prepared to revise or update any policies, procedures, data systems, or operational processes identified as noncompliant. Continued failure to resolve issues may result in the school maintaining a High-risk status in subsequent annual Risk Assessments.

Closing Remarks and Contact Information

The SPCSA remains committed to supporting all subrecipients in meeting federal, state, and grant-specific requirements. This manual is designed to serve as a comprehensive resource for navigating the Risk-Based Monitoring process, understanding expectations, and preparing for annual risk assessments and monitoring activities.

For questions related to Risk-Based Monitoring procedures, annual risk assessments, monitoring requirements, or Corrective Action Plans, please contact the **Subrecipient Monitoring Team** at: MonitoringandEvaluation@spcsa.nv.gov

For questions regarding programmatic monitoring requirements—including Titles, CTE, or Special Education—please contact the **School Support Team** at: schoolsupport@spcsa.nv.gov

SPCSA staff are available year-round to provide clarification, guidance, and technical assistance. We encourage all subrecipients to reach out early and often when questions arise. Our goal is to support your continued compliance and help strengthen your internal systems.

Appendices

The following resources support the implementation of the SPCSA's Risk-Based Monitoring framework and include supplemental guidance, templates, tools, and training materials referenced throughout this manual. These appendices are intended to provide practical support and help subrecipients successfully meet all monitoring and compliance requirements.

Subrecipients are encouraged to review these materials regularly and ensure all relevant staff members have access to the most current versions.

Appendix A: SPCSA Resources – Canvas Repository

https://spcsa.instructure.com/courses/75

- Risk-Based Monitoring Training Presentation (RBM Overview)
- Fiscal Policies and Procedures Guidance
- Corrective Action Plan (CAP) Template
- Annual Risk Assessment Tool
- Example Risk Assessment Scoring Guide
- Monitoring Agenda Templates (Comprehensive and Targeted)
- Monitoring Report Example

Appendix B: Federal Resources

- Uniform Guidance
  2 C.F.R. Part 200
- Federal Cost Principles
  eCFR :: 2 CFR Part 200 Subpart E -- Cost Principles
- Federal Agency Review of Risk Posed by Applicants (Risk Assessment)
  eCFR :: 2 CFR 200.206 -- Federal agency review of risk posed by applicants.
- Specific Conditions
  eCFR :: 2 CFR 200.208 -- Specific conditions.
- Performance Measurement
  eCFR :: 2 CFR 200.301 -- Performance measurement.
- Financial Management
  eCFR :: 2 CFR 200.302 -- Financial management.
- Internal Controls
  eCFR :: 2 CFR 200.303 -- Internal controls.
- Subrecipient Determination
  eCFR :: 2 CFR 200.331 -- Subrecipient and contractor determinations.
- Requirements for Pass-Through Entities

eCFR :: 2 CFR 200.332 -- Requirements for pass-through entities.

- Remedies for Noncompliance
  eCFR :: 2 CFR 200.339 -- Remedies for noncompliance.
- Audit Requirements
  eCFR :: 2 CFR 200.501 -- Audit requirements.

Appendix C: SPCSA School Performance Reports

https://charterschools.nv.gov/Performance_Reports/Performance_Reports/

Additional relevant links may be added as resources are updated.

NEVADA STATE PUBLIC CHARTER SCHOOL AUTHORITY
2026-2027 School Year

Risk Assessment Guide

A reference for leaders at state-authorized charter schools in Nevada

Nevada State Public Charter School Authority

Carson City Office
3427 Goni Rd, Suite 103 Carson City, NV 89706
775-687-9174

Las Vegas Office
500 E. Warm Springs Road, Suite 116 Las Vegas, NV 89119
702-486-8895

https://charterschools.nv.gov/

Table of Contents

Risk Assessment Overview 3
Purpose of Risk Assessment 5
How the Risk Assessment Tool Works 7
Risk Assessment Tool Example 8
How Risk Is Scored 10
Financial Stability: 10
Management Systems & Standards: 10
History of Performance: 11
Audit Reports & Findings: 11
Ability to Implement Requirements: 12
Programmatic Performance: 12
Risk Level Determination (Total Score) 14
Low-Risk (≤10 points): 14
Medium-Risk (>10 and ≤ 20 points): 14
High-Risk (Over >20 points): 14
Comprehensive Cyclic Onsite Monitoring (Years 2 and 5): 14
What Risk Assessment Means for Schools 16
Appendices 17
Appendix A – SPCSA Resources (Canvas Repository) 17
Appendix B – Federal Regulations 17
Appendix C –SPCSA School Performance Reports 18

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Risk Assessment Overview

Every year, each charter school sponsored by the State Public Charter School Authority (SPCSA) undergoes a formal Risk Assessment to evaluate the likelihood of experiencing fiscal, administrative, or programmatic challenges that could lead to noncompliance with federal or state requirements. This annual review occurs at the beginning of the fiscal year and is based on information submitted during the previous school year, including audits, monitoring documentation, grant performance, and required submissions.

As a pass-through entity, the SPCSA receives federal funds and distributes them to charter schools in the form of subgrants. Federal law requires pass-through entities to evaluate each subrecipient's risk of noncompliance prior to awarding or continuing federal funding. Under 2 C.F.R. § 200.206 — Federal agency review of risk posed by applicants — federal agencies and entities administering federal funds must review the risk profile of each applicant or subrecipient to determine their ability to: • carry out federally funded activities:

- comply with applicable statutes and requirements,
- maintain proper internal controls, and
- safeguard public funds.

This regulation requires entities like the SPCSA to evaluate key areas such as:

(i) Financial stability: The applicant's record of managing financial risks, assets, and resources.
(ii) Management systems and standards: The quality of management systems and the applicant's ability to meet required standards.
(iii) History of performance: The applicant's record of managing federal awards, including reporting compliance and adherence to award terms.
(iv) Audit reports and findings: Results from audits performed under subpart F or other relevant audits.
(v) Ability to effectively implement requirements: The applicant's capacity to carry out statutory, regulatory, and other requirements of federal awards.

Because the SPCSA is responsible for awarding federal funds and ensuring they are used lawfully, it must apply these risk-based standards consistently across all sponsored charter schools. Schools with strong records of compliance, timely submissions, and robust internal controls generally receive lower risk scores. Conversely, schools with repeated findings, unresolved Corrective Action Plans (CAPs), audit concerns, or challenges meeting grant requirements may be designated as higher risk and may require additional monitoring or support to protect federal funds and ensure proper implementation of program activities.

The SPCSA's risk-based approach is not only a federal requirement but also an important tool for ensuring consistency, fairness, and transparency in oversight. It allows SPCSA to identify areas where technical assistance, strengthened systems, or closer oversight may be beneficial. Through this approach, the SPCSA serves as both a compliance authority and a support partner to state-sponsored charter schools.

To maintain this high standard of oversight, the SPCSA's Risk-Based Monitoring (RBM) team—comprised of staff with expertise in finance, grants management, special education, federal programs, and charter school operations—reviews and updates the risk criteria each year. This ensures the assessment remains current, relevant, and responsive to changes in federal rules, school operations, and emerging compliance patterns.

Once the assessment is complete, each school receives its risk designation and a copy of its final Risk Assessment Tool. This documentation outlines the indicators evaluated, the points assigned, and the monitoring requirements for the year.

The SPCSA's risk-based approach is not only a federal requirement, it also establishes a consistent, fair, and transparent process for evaluating schools and identifying areas where technical assistance, strengthened systems, or closer oversight may be needed. Through this process, SPCSA serves as both a compliance agency and a support partner to state sponsored charter schools.

To maintain this high standard of oversight, SPCSA's Risk-Based Monitoring (RBM) team—made up of staff with expertise in finance, grants management, special education, federal programs, and charter school operations—reviews and updates the risk criteria each year. This ensures the assessment remains current, relevant, and responsive to changes in federal rules, school operations, and emerging patterns in compliance.

Once the assessment is complete, each school receives its risk designation and a copy of its final Risk Assessment Tool. This documentation outlines the indicators evaluated, the points assigned, and the monitoring requirements for the year.

Purpose of Risk Assessment

SPCSA's annual risk assessment is designed to ensure that all subrecipients of federal funds are effectively managing public resources, complying with federal and state regulations, and meeting program expectations. Because the SPCSA is responsible for fiscal, administrative, and programmatic oversight, the risk assessment serves as the foundation for determining the appropriate level of monitoring and support each school will receive throughout the year. Specifically, the risk assessment supports the following objectives:

1. **Promote Accountability and Transparency**
   The risk assessment provides a standardized, objective method for evaluating charter school performance on key compliance indicators. This helps schools clearly understand expectations and the factors that influence monitoring decisions. It also ensures SPCSA's oversight is fair, consistent, and aligned with federal requirements.

2. **Ensure Compliance with Federal and State Requirements**
   The assessment reviews how well each school has adhered to federal laws such as the Uniform Guidance (2 C.F.R. Part 200), state statutes, grant conditions, and SPCSA's requirements for fiscal and programmatic performance. Schools demonstrating late submissions, unresolved findings, or inadequate internal controls may require additional support or oversight.

3. **Identify Schools Needing Additional Technical Assistance or Monitoring**
   Risk levels help SPCSA determine where more proactive support is beneficial. Schools with higher risk scores may receive more frequent check-ins, desktop reviews, or onsite visits to address compliance concerns early and prevent more serious issues from developing. This proactive approach supports continuous improvement and reduces the likelihood of significant compliance findings.

4. **Protect Federal Funds and Ensure They Are Used for Authorized Purposes**
   Federal funds must be used in accordance with strict regulations. The risk assessment helps ensure that all expenditures are:

   - allowable,
   - allocable,
   - reasonable, and
   - properly documented.

   This protects students, schools, and taxpayers and ensures grant-funded activities meet their intended purpose.

5. **Establish a Consistent Framework for Performance Evaluation**
   By using a standardized, point-based system, SPCSA ensures that each school is evaluated

according to the same criteria. This promotes equity across the portfolio and makes monitoring decisions predictable and easy to understand.

6. **Strengthen Internal Systems Across Schools**
   Ultimately, the risk assessment is designed to help schools improve fiscal procedures, programmatic implementation, and compliance processes. SPCSA's monitoring model emphasizes collaboration, communication, and long-term capacity building.

How the Risk Assessment Tool Works

Each year, the SPCSA evaluates every sponsored charter school using the Risk Assessment Tool, a structured point-based system that measures a school's likelihood of noncompliance with fiscal, administrative, and programmatic requirements. The assessment relies on data collected from the prior operating year, including audits, reimbursement activity, desktop monitoring results, Epicenter submissions, Corrective Action Plan status, and other compliance documentation submitted to SPCSA. This prior-year evidence determines whether each risk factor is scored as Low (0 points), Medium (5 points), or High (10 points). Each Risk Factor is then added together to come to a total. The total number indicates what the SPCSA calls the Risk Level Determination (see page 14 of this document for a breakdown of total determination numbers.

Risk Assessment Tool Example

The Risk Assessment Tool evaluates individual risk factors based on established criteria. Each factor is assigned a point value reflecting the level of risk identified. Scores are combined to determine the school's overall Risk Assessment Score.

These evaluations are not subjective; they are grounded in verifiable documentation collected throughout the prior school year. This evidence-based approach ensures fairness, consistency, and alignment with federal expectations for subrecipient oversight.

SPCSA Risk Based Monitoring:
Risk Assessment Tool Fiscal Year 2026

Monitoring Focus:

Each year, every school is assessed and assigned a risk level based on a point system. Monitoring requirements are determined by the total number of points and the distribution of those points across the risk areas.
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Comprehensive Cyclic Onsite Monitoring: Every charter school receives a comprehensive onsite monitoring visit in the 1st and 5th year of its charter contract. Outside of these required years, monitoring occurs only if triggered by the school's overall point total.
Targeted Desktop Monitoring: Schools with elevated points in specific areas, but not enough total points to warrant a comprehensive visit, will receive targeted monitoring focused on the particular risk indicators identified through the point system.

School Information:

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Address

Risk Factor, Criteria and Result:

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	Federal Title Spend Down for Prior Fiscal Year (FY2024-2025)	0
Management Systems and Standards	Internal Controls and Grant Compliance Policies & Procedures	0
History of Performance	Resolution of Past Corrective Action Plans (CAPs)	0
	Reimbursement Request Quality	0
Audit Reports and Findings	Single Audit Completion and Timeliness	0
	Material Weaknesses or Significant Deficiencies	0
	Audit Findings Related to Fiscal Management	0
Ability to Implement Requirements	Timeliness of Grant Unit Related Fiscal Requirements (Epicenter)	0
Programmatic Performance	Special Education Unresolved Prior Year Corrective Action Plan	0
	CTE NDE Monitoring Unresolved Prior Year Corrective Action Plan	0
	Desktop Monitoring (e.g. Title I-IV, McKinney-Vento and Foster Care)	0
	Required Plan Received (e.g. School Improvement Plan)	0
Low ≤10, Medium >10 and ≤ 20, High >20		0

Type of monitoring to be performed:	☐ Comprehensive Onsite Monitoring ☐ Comprehensive Cyclic Onsite Monitoring ☐ Targeted Desktop Monitoring ☐ Fiscal/Administrative ☐ Programmatic ☐ No Monitoring Required

SPCSA Program Reviewer: _____ Date: _____

SPCSA Fiscal Reviewer: Date:

The Risk Assessment Tool organizes risk into six major categories, each representing a core area that influences a school's overall compliance posture:

- **Financial Stability**
- **Management Systems and Standards**
- **History of Performance** (including CAP resolution and reimbursement quality)
- **Audit Reports and Findings**
- **Ability to Implement Requirements** (e.g., timeliness of submissions)
- **Programmatic Performance** (Special Education, Title Programs, McKinney-Vento, Foster Care, CTE)

Each category contains specific criteria, and each criterion is assigned a risk level—Low, Medium, or High—based on factual evidence from the previous fiscal year. Examples of the types of documentation reviewed include:

- spend-down percentages on federal awards,
- whether a CAP was resolved or remains outstanding,
- the number of revisions to reimbursement requests,
- single audit timeliness and presence of findings,
- the timeliness of Epicenter submissions, and
- desktop monitoring completion rates.

How Risk Is Scored

Each factor in the risk assessment is assigned **0, 5, or 10 points**, representing levels of concern:

- **0 points = Low Risk**
- **5 points = Medium Risk**
- **10 points = High Risk**

Point values for each indicator are determined using the criteria outlined in the Risk Assessment Tool.

Financial Stability:

SPCSA evaluates the applicant's record of effectively managing financial risks, assets, and resources. Indicators include:

- **Financial Performance Framework Notices**
  - 0 points: No Notice
  - 5 points: Notice of Concern
  - 10 points: Notice of Breach
- **Federal Title Spend-Down for Prior Fiscal Year**
  - 0 points: Less than 5%
  - 5 points: 5–15%
  - 10 points: Over 15%

Financial Stability The school's record of effectively managing financial risks, assets, and resources. **Financial instability increases risk of mismanagement of ferderal funds.**	Financial Performance Framework Notices	Low: No notice Medium: Notice of Concern High: Notice of Breach
	Federal Title Spend Down for Prior Fiscal Year (FY2024-2025)	Low: Less than 5% Medium: 5-15% High: Over 15%

Management Systems & Standards:

This category evaluates the quality of a school's management systems and its ability to meet required standards.

Internal Controls and Grant Compliance Policies & Procedures

- 0 points: Policies are current and fully implemented
- 5 points: Policies exist but are outdated or inconsistently applied
- 10 points: Policies are missing or show minimal evidence of implementation

Management Systems & Standards Quality of management systesms and ability to meet the management standards. **Weak systems lead to reporting errors and non compliance.**	Internal Controls and Grant Compliance Policies & Procedures	Low: Documented, current, and supported by evidence of implementation Medium: Documented but inconsistently implemented or partially outdated High: Missing, outdated, or showing little to no evidence of implementation

History of Performance:

This category evaluates the applicant's record of managing federal awards and adhering to the terms and conditions of those awards.

- **Corrective Action Plan (CAP) Resolution**
  - 0 points: CAP fully resolved
  - 5 points: CAP partially resolved
  - 10 points: CAP unresolved or overdue
- **Reimbursement Request Quality**
  - 0 points: 0–5 revisions
  - 5 points: 6–10 revisions
  - 10 points: More than 10 revisions

History of Performance The school's record of managing previous and current Federal awards and conformance to the terms and conditions of Federnal awards, if applicab;e. **Past performance predicts future risks.**	Resolution of Past Corrective Action Plans (CAPs)	Low: CAP fully resolved Medium: CAP partially resolved High: Unresolved or overdue CAP
	Reimbursement Request Quality	Low: 0-5 revisions Medium: 6-10 revisions High: Over 10 revisions

Audit Reports & Findings:

This category evaluates reports and findings from audits performed under Subpart F, as well as any other relevant audits.

- **Single Audit Completion and Timeliness**
  - 0 points: Audit submitted timely
  - 5 points: Audit submitted late but less than 30 days
  - 10 points: Audit not submitted or submitted more than 30 days late
- **Material Weaknesses or Significant Deficiencies**
  - 0 points: No material weaknesses or significant deficiency findings and no repeat findings
  - 5 points: One or more significant deficiencies and/or repeat significant deficiency findings from prior audits
  - 10 points: Material weaknesses identified and/or repeat material weakness findings from prior audits

• **Audit Findings Related to Fiscal Management**

– 0 points: No repeat findings
– 5 points: Finding repeated once
– 10 points: Same finding repeated in consecutive audits

Audit Reports and Findings Reports and findings from audits performed under subpart F or the reports and findings of any other available audit. **Audit issues signal systemic problems.**	Single Audit Completion and Timeliness	Low: Audit submitted timely Medium: Audit submitted late but less than 30 days High: Audit not submitted or more than 30 days late
	Material Weaknesses or Significant Deficiencies	Low: No material weaknesses or significant deficiency findings and no repeat findings Medium: No material weakness findings but one or more significant deficiencies and/or repeat significant deficiency findings from prior audits High: Material weaknesses identified and/or repeat material deficiency findings from prior audits
	Audit Findings Related to Fiscal Management	Low: No repeat findings Medium: Finding repeated once High: Same finding repeated in consecutive audits

Ability to Implement Requirements:

This category evaluates a school's capacity to effectively implement statutory, regulatory, and other requirements imposed on recipients of federal awards.

Timeliness of Grant-Unit-Related Epicenter Submissions

– 0 points: All tasks and reports submitted on or before the due date
– 5 points: One late submission
– 10 points: Multiple late or missing submissions

Ability to Implement Requirements The school's ability to effectivelty implement statutory, or other requirements imposed or reciepients of Federal awards. **Low capacity increases risk of non compliance.**	Timeliness of Grant Unit Related Fiscal Requirements (Epicenter)	Low: All tasks/reports submitted on/or before the due date Medium: One late submission High: Multiple missing or late submissions

Programmatic Performance:

This category evaluates a school's ability to implement program requirements, deliver services as intended, and meet established performance objectives.

• **Special Education – Prior Year Corrective Action Plan (CAP)**

– 0 points: CAP fully resolved
– 10 points: CAP unresolved or overdue

• **CTE – NDE Monitoring Prior Year Corrective Action Plan (CAP)**

– 0 points: CAP fully resolved
– 10 points: CAP unresolved or overdue

• **Desktop Monitoring** (such as Title I–IV, McKinney-Vento, and Foster Care)

– 0 points: All desktop monitoring items submitted
– 5 points: 5–10% of required items missing
– 10 points: More than 10% of required items missing

- **Required Plan Submission** (such as School Improvement Plans)

  – 0 points: Plan accepted and implemented
  – 5 points: Plan submitted more than 5 days past the deadline and required more than 3 revisions
  – 10 points: Plan incomplete or rejected

Programmatic Performance The school's ability to effectively implement program requirements, deliever services as intended, and achieve performance objectives. **Weak programmatic performance increases the risk of failing to meat statutory goals, negativelu impact beneficiaries and compliance.**	Special Education Unresolved Prior Year Corrective Action Plan	Low: CAP fully resolved High: Unresolved or overdue CAP
	CTE NDE Monitoring Unresolved Prior Year Corrective Action Plan	Low: CAP fully resolved High: Unresolved or overdue CAP
	Desktop Monitoring (e.g. Title I-IV, McKinney-Vento and Foster Care)	Low: All desktop monitoring items turned in. Medium: 5-10% desktop monitoring items missing High: >10% desktop monitoring items missing
	Required Plan Received (e.g. School Improvement Plan)	Low: Plan accepted and implemented Medium: Plan submitted more than 5 days past the due date **AND** required more than 3 revisions High: Plan incomplete or rejected

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Risk Level Determination (Total Score)

Once every risk factor has been scored using prior year data, all points are added together to create the school's overall risk score. The total score determines the school's monitoring level for the fiscal year.

This systematic scoring model ensures that monitoring decisions are data-informed, equitable, consistent across all schools, and aligned with federal requirements for risk-based oversight.

Low-Risk (≤10 points):

Schools in this range demonstrate strong internal controls, timely and accurate submissions, compliant audits, and no major unresolved issues.

- **Do not receive monitoring** for the fiscal year
- Continue required Epicenter submissions and annual assessments
- May receive Comprehensive Cyclic Onsite Monitoring if in Year 2 or Year 5 of the charter term (mandatory for all SPCSA-sponsored schools)

Medium-Risk (>10 and ≤ 20 points):

Schools in this range show emerging concerns or inconsistencies but do not meet the threshold for comprehensive monitoring. This targeted approach reduces burden while ensuring appropriate oversight.

- Receive targeted virtual/desktop monitoring
- Are monitored only in the areas that contributed to their risk score
- Participate in document reviews, virtual meetings, clarification requests, and follow-ups as needed

High-Risk (Over >20 points):

Schools in this range present significant compliance concerns or patterns of missed deadlines, audit issues, or programmatic deficiencies.

- Receive comprehensive onsite monitoring
- Undergo review of fiscal, administrative, and programmatic systems
- Participate in onsite interviews, campus walkthroughs, document sampling, policy review, and assessment of internal controls

Comprehensive Cyclic Onsite Monitoring (Years 2 and 5):

In addition to risk-based monitoring, all SPCSA-sponsored schools receive a Comprehensive Cyclic Onsite Monitoring visit in:

- Year 2 of the charter contract
- Year 5 of the charter contract

These visits occur regardless of a school's annual risk score and ensure each school receives periodic, full-scope oversight at key stages of its charter term. Cyclic visits follow the same structure as Comprehensive Onsite Monitoring and provide SPCSA with an opportunity to evaluate long-term implementation, internal systems, and alignment with federal requirements.

Outside of Years 2 and 5, schools are monitored only if their annual risk score requires it.

What Risk Assessment Means for Schools

The SPCSA risk assessment is not meant to be punitive. Its purpose is to strengthen school systems and ensure federal funds are managed responsibly. The results help:

- Identify where a school may benefit from additional support or technical assistance
- Ensure fiscal, administrative, and programmatic systems remain compliant and well-documented
- Promote strong stewardship of federal funds
- Guide SPCSA in targeting resources and oversight where they are most needed

A higher risk score does not reflect a school's academic quality or student outcomes—it only indicates the school's risk of noncompliance with federal grant requirements, based on prior-year documentation and submissions.

Closing Remarks

The SPCSA is committed to supporting schools in maintaining strong internal controls, accurate reporting, and compliant fiscal and programmatic systems. The annual Risk Assessment process is designed to be transparent, predictable, and supportive, ensuring schools have the guidance they need to successfully meet federal and state requirements.

Schools are encouraged to:

- Review this guide with fiscal, grants, and program leadership
- Maintain up-to-date policies and procedures
- Ask questions early and often
- Use SPCSA resources, trainings, and technical assistance opportunities

For assistance or questions, please contact:

- **Subrecipient Monitoring Team:** MonitoringandEvaluation@spcsa.nv.gov
- **Programmatic Support (Titles, CTE, Special Education):** schoolsupport@spcsa.nv.gov

SPCSA staff are available throughout the year to provide clarification, guidance, and support as schools continue strengthening their systems and ensuring compliance.

Appendices

Appendix A – SPCSA Resources (Canvas Repository)

Link: https://spcsa.instructure.com/courses/75
Includes:

- RBM Training PowerPoint
- Fiscal Policies & Procedures Guides
- CAP Template
- Risk Assessment Tool (current year)
- Monitoring Agenda Templates
- Sample Monitoring Report

Appendix B – Federal Regulations

- Uniform Guidance
  2 C.F.R. Part 200
- Federal Cost Principles
  eCFR :: 2 CFR Part 200 Subpart E -- Cost Principles
- Federal Agency Review of Risk Posed by Applicants (Risk Assessment)
  eCFR :: 2 CFR 200.206 -- Federal agency review of risk posed by applicants.
- Specific Conditions
  eCFR :: 2 CFR 200.208 -- Specific conditions.
- Performance Measurement
  eCFR :: 2 CFR 200.301 -- Performance measurement.
- Financial Management
  eCFR :: 2 CFR 200.302 -- Financial management.
- Internal Controls
  eCFR :: 2 CFR 200.303 -- Internal controls.
- Subrecipient Determination
  eCFR :: 2 CFR 200.331 -- Subrecipient and contractor determinations.
- Requirements for Pass-Through Entities
  eCFR :: 2 CFR 200.332 -- Requirements for pass-through entities.
- Remedies for Noncompliance
  eCFR :: 2 CFR 200.339 -- Remedies for noncompliance.
- Audit Requirements
  eCFR :: 2 CFR 200.501 -- Audit requirements.

Additional relevant links may be added as resources are updated.

Appendix C –SPCSA School Performance Reports

https://charterschools.nv.gov/Performance_Reports/Performance_Reports/

Coversheet

Discussion for possible action to approve Foster Care Policy, McKinney-Vento Policy, and English Learner Policy.

Section: III. Executive Update
Item: D. Discussion for possible action to approve Foster Care Policy, McKinney-Vento Policy, and English Learner Policy.
Purpose: Vote
Submitted by:
Related Material: 2026_Foster_Care_Policy_Plan.pdf
2026_Mckinney_Vento_Policy_Plan.pdf
ELL Policy and Plan .docx.pdf

Foster Care Policy and Plan

- **STRONG START ACADEMY ELEMENTARY SCHOOL**

1 CONTENTS

Strong Start Academy Elementary School 1

2 About Strong Start Academy Elementary School 4

2.1 School Mission Statement 4

2.2 School Vision Statement 4

2.3 School Website and School Improvement Plan 4

3 Introduction 4

3.1 Purpose 4

3.2 Legal Requirements 4

3.3 Board Approval 5

3.3.1 Board Approval 5

3.3.2 Stakeholders 5

3.4 Description 5

3.5 Definitions and Acronyms 5

4 School of Origin and Best Interests Determination 6

5 Enrollment 7

5.1 Immediate Enrollment 7

5.2 Recording Foster Care Status in Infinite Campus 7

6 Identification and Tracking of Foster Students 8

6.1 Identification 8

6.2 Tracking of Foster Care Students 8

6.3 Data Validation 8

7 Transportation 8

8 Foster Care Liaison 10

9 Educational Records and Confidentiality 10

9.1 Local Family Service Agency Request of Education Records: 10

9.2 Local Family Service Agency Use of Educational Records: 10

9.3 Student Confidentiality 11

9.4 Designation of the local family service agency as School Official 11

10 Full or Partial Credit Requirements 11

11 References 12

12 Appendix A: Links 12

1 About Strong Start Academy

Strong Start Academy is a dual language charter school that offers a 50/50 dual-language education model in which students spend 50% of their day learning in English and 50% of their day learning in Spanish. Academic instruction occurs in both languages. Students alternate learning in two languages between morning and afternoon and between content areas. The three goals at Strong Start Academy are: 1) Build bilingual and biliteracy in all students. 2) Ensure students are on or above grade level. 3) Promote positive cross-cultural attitudes and behaviors.

1.1 School Mission Statement

The mission of Strong Start Academy Elementary School is to provide equitable, high-quality academics as we prepare our bilingual, civic-minded thinkers to maximize their potential in their community and the world.

SSAES is committed to building a culture of high academic achievement for all students.

All children will engage in dual language education that supports and embraces the development of English and Spanish while honoring their home languages and cultures.

SSAES will offer rich linguistic and cultural education that values and develops families' cultural heritages and home languages as assets.

Providing an enriched multilingual education combined with high expectations will help students attain their greatest potential and close the achievement gap while preparing them for success in the 21st century.

1.2 School Vision Statement

The vision of Strong Start Academy Elementary School is a culturally diverse learning community that prepares children to excel academically in two languages and have a positive impact on an increasingly evolving and global society.

1.3 School Website and School Improvement Plan

For additional information about Strong Start Academy, please refer to the website at clvstrongstartes.org.

You may also wish to review the School Improvement Plan:
https://www.clvstrongstartes.org/wp-content/uploads/2026/08/Strong-Start-Academy-Elementary-School-Entire-Plan-w_-Notes-Addendums-3.pdf

2 Introduction

This manual serves as a reference for Strong Start Academy Elementary School regarding the topic of Foster Care.

2.1 Purpose

The purpose of the Foster Care Policy and Plan is to define procedures and specify program elements to ensure equal participation in all education programs for Foster Care students. An effective policy, plan, and program, ensures that all students have been provided with the necessary support and have been given the opportunity to meet all requirements for high school graduation.

2.2 Legal Requirements

Nevada's Assembly Bill (AB) 491 of 2017 describes educational legal requirements for students in foster care that are codified in Nevada Revised Statute (NRS) Chapter 388E. Additionally the Every Student Succeeds Act (ESSA) of 2015 (20 U.S.C. § 6311) led to states being required to have procedures for children in foster care to remain in their school of origin.

Programs must be in compliance with NRS Chapter 385 and NRS Chapter 388 and the components that govern public schools, along with NRS chapter 388A which are the provisions that govern charter schools. Nevada's Senate Bill (SB) 147 (2019) resulted in additional provisions for homeless, unaccompanied, and foster care pupils that are codified in NRS388.205, NRS388A.489, and NRS389.320.

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records is also referenced in this manual.

2.3 Board Approval

2.3.1 Board Approval

Each SPCSA school is required to have the Foster Care Policy and Plan approved by their school board.

This manual was approved on: September 10, 2026

2.3.2 Stakeholders

The following stakeholders participated in the review and approval process of this plan:

- Lorna James-Cervantes: Board President
- Alicia Arroyo: Board Secretary
- Maria Tamayo Soto: Board Treasurer
- Alee Moore: Board Member
- Dachresha Harris: Board Member
- Angela Scurry: Board Member
- Roxann McCoy: Board Member
- Vanessa Mari: Board Member
- Kristie Cole: Board Member

2.4 Description

This manual contains information regarding:

- Definitions relevant to Foster Care Students
- Information regarding School of Origin and Best Interests Determination
- Enrollment
- Identification and Tracking of Foster Care Students
- Transportation
- Foster Care Liaison
- Educational Records and Confidentiality
- Full or Partial Credit Requirements
- References
- Links

2.5 Definitions and Acronyms

Throughout this manual you will encounter a variety of terms that are relevant to this process. Additionally, some items may be referred to using acronyms. Please review the following items to familiarize yourself with the terminology and acronyms used throughout this manual.

- Best Interests Determination:
  - When a child enters foster care or changes placement while in foster care, the agency which provides child welfare services to the child shall determine whether it is in the best interests of the child for the child to remain in his or her school of origin. In making this determination, there is a rebuttable presumption that it is in the best interests of the child to remain in his or her school of origin (NRS 388E.105)
- Every Student Succeeds Act (ESSA):
  - is the federal K-12 education law of the United States. ESSA was signed into law in 2015 and replaced the previous education law called "No Child Left Behind." It is a reauthorization of the Elementary and Secondary Education Act (ESEA) of 1965.
- Family Educational Rights and Privacy Act (FERPA):
  - The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. Additional information about FERPA may be reviewed at https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html.
- Foster Care:
  - Based on NAC 432B.017, the term "foster care" means any out-of-home placement of a child. The term includes:
    1. The placement of a child into:
       (a) A family foster home, as that term is defined in NRS 424.013;
       (b) A group foster home, as that term is defined in NRS 424.015; or
       (c) Any other similar institution having the appropriate qualifications and facilities to provide the necessary and desirable degree and type of care to the child.
    2. The placement of a child with a relative other than the relative who had a legal responsibility for providing a home for the child before the child was placed into the custody of the agency which provides child welfare services.
    3. An independent living arrangement approved by the agency which provides child welfare services in accordance with NAC 432B.410, made by the agency which provides child welfare services for a child in the custody of the agency which provides child welfare services pursuant to NRS 127.050 or 432B.550, or for whom the agency which provides child welfare services is responsible pursuant to NRS 432B.360. (Added to NAC by Div. of Child & Fam. Services by R221 97, eff. 6 5 98; A by R045 02, 7 23 2002)
- Infinite Campus (IC):
  - Infinite Campus is the Student Information System (SIS) used by all public schools in Nevada.
- Nevada Department of Education (NDE):
  - The Nevada Department of Education or NDOE, autonomous of the governor and the Nevada State Legislature, administers primary and secondary public education in the state of Nevada.
- Nevada Revised Statute (NRS):
  - The Nevada Revised Statutes are all the current codified laws of the State of Nevada. Nevada law consists of the Constitution of Nevada and Nevada Revised Statutes.
- Participating school:
  - A charter school that is sponsored by the State Public Charter School Authority.
- School of Origin:
  - The public school in which a child was enrolled at the time that the child was placed in foster care or the school in which a child who is in foster care is enrolled at the time of the most recent change in the placement of the child.

- State Public Charter School Authority (SPCSA):
    - The State Public Charter School Authority (SPCSA) authorizes public charter schools across Nevada and is responsible for the oversight and monitoring of those schools to ensure positive academic outcomes for students and strong stewardship of public dollars.
- US Department of Education (USED):
    - The U.S. Department of Education is the agency of the federal government that establishes policy for, administers, and coordinates most federal assistance to education.

3 School of Origin and Best Interests Determination

The school of origin is the public school in which a child was enrolled at the time that the child was placed in foster care or the school in which a child who is in foster care is enrolled at the time of the most recent change in the placement of the child.

When a child enters foster care or is moved to a new foster home, a best interests determination is conducted to determine if the student should remain in the school of origin or enroll in a different public school. The best interests determination should occur in conjunction with the relevant schools (school of origin and potential new school), the SPCSA foster care liaison, and the local family services agency to determine the appropriate placement.

Per NRS 388E.105 (2):

In determining whether it is in the best interests of a child in foster care to remain in his or her school of origin, the agency which provides child welfare services, in consultation with the local education agency and the educational decision maker appointed for the child pursuant to NRS 432B.462, must consider, without limitation:

(a) The wishes of the child;
(b) The educational success, stability and achievement of the child;
(c) Any individualized education program or academic plan developed for the child;
(d) Whether the child has been identified as an English learner;
(e) The health and safety of the child;
(f) The availability of necessary services for the child at the school of origin;
(g) Whether the child has a sibling enrolled in the school of origin; and
(h) A plan for the continued education of the child, developed pursuant to NRS 432B.60847, if the child is admitted to a psychiatric hospital or facility which provides residential treatment for mental illness.

The costs of transporting the child to the school of origin must not be considered when determining whether it is in the best interests of the child to remain at his or her school of origin.

Once the best interests determination has been conducted, if a dispute arises regarding the placement, the local family services agency will make the final decision regarding the child's school which will be subject to court approval if any party objects.

Additionally, upon exit from foster care, the child may remain in the school of origin until the child enters a grade level that is no longer served by the school, or reaches an age where they are no longer eligible to attend the level of school.

4 Enrollment

4.1 Immediate Enrollment

In accordance with subsection 2 of NRS 388A.453, when it is determined that it is in the best interests of the child to change schools, immediate enrollment means the school's legal requirement to immediately enroll the child into the new school regardless if the new school has received all the child's educational records; school transfer records, immunization records or any other unmet educational or academic requirements. Enrollment for a child in foster care cannot be denied or delayed. The enrolling school shall immediately contact the school of origin to obtain relevant academic and other records and those records will be promptly transferred.

4.2 Recording Foster Care Status in Infinite Campus

Foster Care status will be recorded in Infinite Campus by the Office Manager.

Foster Care students must be correctly entered in Infinite Campus for a variety of purposes including grant eligibility and desktop monitoring. SPCSA must be able to accurately obtain data regarding the numbers of Foster Care students for reporting to NDE via Infinite Campus. Please use the instructions below to accurately identify Foster Care students in Infinite Campus.

1. In the Campus Tools menu on the "Index" tab, choose "Student Information" then click "Program Participation", then choose "Foster Care" from the index that appears.
2. Locate the student using the search tab.
3. Once you have pressed "Go" to locate the student, press "New" to enter the information for the Foster Care student. You must enter:
   - Placement type
   - "Start Date"
   - "End Date" should be entered if available from the department of family services if the expected end date is known. If the student exits foster care status during the school year, you should update the end date when notified.
   - Enter the social worker name.
   - Enter the school name for the "Owner".
4. Return to the "Index" tab and select "General". It will display the student "Summary" tab. Click the "Flags" tab.
5. On the "Flags" tab, press the "New" button to add the Foster Care flag for the student. You should enter a "Start Date" and "End Date".

5 Identification and Tracking of Foster Care Students

5.1 Identification

Strong Start Academy uses an Online Registration process through Infinite Campus. In order to complete the registration process, required documents must be uploaded. The required documents include, but are not limited to: student birth certificate, valid form of identification for parent/guardian, proof of current address, and student immunization records. Once an application is submitted, the Office Manager must review the application and all corresponding documentation must be submitted prior to application approval. During this process, the Office Manager would identify any student placed in the foster care system and alert the school's Safe School Professional so that they could collaborate with the parent/guardian and the child welfare agency to ensure school stability and prompt enrollment.

5.2 Tracking of Foster Care Students

The school's Safe School Professional will serve as the Foster Care Liaison. The Safe School Professional will work with the child's teacher to create an academic plan which will be housed in Infinite Campus. The Safe School Professional is responsible for reviewing the plan and making any modifications to the plan.

5.3 Data Validation

The Safe School Professional will ensure that all data required of Foster Care students is accurate and available in Infinite Campus. The Safe School Professional will then prepare the required report(s) and submit them to the Executive Director. The Executive Director will validate the information and submit the report(s) to the required entity (Nevada Department of Education and/or State Public Charter School Authority) .

6 Transportation

Transportation procedures are determined according to the Memorandum of Understanding (MOU)/Interlocal agreements with the local family services agencies in the state of Nevada.

In addition to ESSA and Fostering Connections, NRS Chapters 388 and 388E provides guidance on addressing school transportation in the rural school districts. The SPCSA, each Participating School and the local family service agency will regularly monitor compliance with ESSA, the Fostering Connections Act, state law and this Memorandum of Understanding.

7 Foster Care Liaison

Every school is required to have a Foster Care Liaison. It is the job of the Liaison to ensure that foster care students have the same opportunities as all other students, which includes ensuring that foster care students are able to attend school, arranging for transportation in a timely manner, keeping the school staff informed of the rights of foster care students, communicating with the parents/guardians of foster children and youth, and communicating with the local family services agency.

The foster care liaison may communicate and provide information through a variety of methods including but not limited to:

- Email.
- Phone.
- Professional Development for school staff.
- Informational materials such as flyers and posters regarding the rights of foster care students.
- Distribution of internet-based resources regarding foster care matters.

The foster care liaison at our school is:

Christine Nguyen
(702) 463-0222
cnguyen@clvstrongstartes.org

8 Educational Records and Confidentiality

The policies for sharing educational records and confidentiality for students in foster care are determined according to the Memorandum of Understanding (MOU)/Interlocal agreements with the local family services agencies in the state of Nevada.

In January 2013, Family Educational Rights and Privacy Act (FERPA) was amended in the U.S. Department of Education through the enactment of the Federal Uninterrupted Scholars Act (USA). The USA made key revisions to FERPA that permits educational agencies to disclose a student's education records, without parental consent, to a caseworker or other representatives of child welfare agencies.

8.1 Local Family Service Agency Request of Education Records:

The local family service agency caseworker requesting the records will provide a badge identifying the caseworker as a local family service agency employee and proof of custody of the student with the one of the following:

- A written notification on the local family service agency letterhead indicating that the agency has legal custody or is otherwise legally responsible for the care and protection of the child or
- A court order.

8.2 Local Family Service Agency Use of Educational Records:

The manner in which the local family service agency may use a child's education records, including, without limitation, electronic education records maintained by the school and/or Participating School:

- To ensure the child's education needs are met.
- Effectively implement a child's case plan.
- Maintain the child's educational stability.
- Provide services to address a student's educational needs.
- Monitor a child's educational outcomes and promote success.

8.3 Student Confidentiality

Consistent with the MOU/Interlocal and with state and federal law, the SPCSA, each Participating School and the local family service agency shall protect confidential information from re-disclosure unless specifically authorized by state or federal law. The SPCSA, each Participating School and the local family service agency shall report any unauthorized releases of exchanged data to the other party and cooperate in taking appropriate corrective action.

The local family service agency, the SPCSA and each Participating School acknowledge that each entity has a legal obligation to maintain the confidentiality and privacy of student records and information identifying a student or child being in foster care. Parties agree to maintain compliance with the Uninterrupted Scholars Act, FERPA and with any other federal and state laws protecting the rights of children who are in the protective custody of a child welfare agency. The local family service agency, the SPCSA and each Participating School agree to safeguard all such information.

8.4 Designation of the local family service agency as School Official

In accordance with the Family Education Rights and Privacy Act (FERPA) (20 U.S.C. §1232g and 34 C.F.R Part 99), the Participating School shall designate the local family service agency as a School Official.

9 Full or Partial Credit Requirements

Our school does not currently offer a middle school or high school program and is not subject to full or partial credit requirements.

10 References

Additional reference materials have all been linked within the text of this manual, and will be listed in "Appendix A: Links" of this manual.

11 Appendix A: Links

A variety of links have been provided throughout this manual and are listed below in the order that they appear in this manual:

- AB491 of 2017:
  - https://www.leg.state.nv.us/Session/79th2017/Bills/AB/AB491.pdf
- NRS Chapter388E:
  - https://www.leg.state.nv.us/nrs/NRS-388E.html
- ESSA:
  - https://www.law.cornell.edu/uscode/text/20/6311
- NRS Chapter 385:
  - https://www.leg.state.nv.us/nrs/nrs-385.html
- NRS Chapter 388:
  - https://www.leg.state.nv.us/nrs/nrs-388.html
- NRS Chapter 388A:
  - https://www.leg.state.nv.us/nrs/NRS-388A.html
- NRS Chapter 388E:
  - https://www.leg.state.nv.us/nrs/NRS-388E.html
- SB147 of 2019:
  - https://www.leg.state.nv.us/Session/80th2019/Bills/SB/SB147_EN.pdf
- FERPA:
  - 20 U.S.C. § 1232g: https://www.law.cornell.edu/uscode/text/20/1232g
  - 34 CFR Part 99: https://www.ecfr.gov/current/title-34/subtitle-A/part-99?toc=1
- NRS Chapter 388E:
  - https://www.leg.state.nv.us/nrs/NRS-388E.html
- General information about FERPA:
  - https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html
- NAC 432B.017
  - https://www.leg.state.nv.us/nac/NAC-432B.html#NAC432BSec017

McKinney-Vento/Homeless Policy and Plan

- **STRONG START ACADEMY ELEMENTARY SCHOOL**

Board Approved 10/9/2025

1 CONTENTS

Strong Start Academy Elementary School 1

2 About Strong Start Academy 2

2.1 School Mission Statement 3

2.2 School Vision Statement 3

2.3 School Website and School Improvement Plan 3

3 Introduction 3

3.1 Purpose 3

3.2 Legal Requirements 3

3.3 Board Approval 4

3.3.1 Board Approval 4

3.3.2 Stakeholders 4

3.4 Description 4

3.5 Definitions and Acronyms 4

4 Rights of Homeless Children and Youth 6

5 Dissemination of Educational Rights information 7

6 Identification 8

6.1 Self-Identification 8

6.1.1 Online Registration 8

6.1.2 Other Identification Methods 8

6.2 Other Staff Identification 8

6.3 Recording Homeless Status in Infinite Campus 8

7 School Selection 9

7.1 Immediate Enrollment 9

7.2 The Right to Choose What School to Attend 9

8 Transportation 10

9 Disputes 10

10 Services 11

10.1 Homeless Education Liaison 11

10.2 Special Education 11

10.3 After School Programs 11

11 Free Meals 12

12 Training 12

12.1 McKinney-Vento Liaison 12

12.2 Other School Staff 13
13 Coordination 13
13.1 Coordination with Local Social Service Agencies 13
13.2 Records Sharing and Transfer 13
14 Preschool 13
15 Full or Partial Credit Requirements 13
16 References 14
17 Appendix A: Links 15
18 Appendix B: Forms 16

2 About Strong Start Academy

Strong Start Academy is a dual language charter school that offers a 50/50 dual-language education model in which students spend 50% of their day learning in English and 50% of their day learning in Spanish. Academic instruction occurs in both languages. Students alternate learning in two languages between morning and afternoon and between content areas. The three goals at Strong Start Academy are: 1) Build bilingual and biliteracy in all students. 2) Ensure students are on or above grade level. 3) Promote positive cross-cultural attitudes and behaviors.

2.1 School Mission Statement

The mission of Strong Start Academy Elementary School is to provide equitable, high-quality academics as we prepare our bilingual, civic-minded thinkers to maximize their potential in their community and the world.
SSAES is committed to building a culture of high academic achievement for all students.

All children will engage in dual language education that supports and embraces the development of English and Spanish while honoring their home languages and cultures.

SSAES will offer rich linguistic and cultural education that values and develops families' cultural heritages and home languages as assets.

Providing an enriched multilingual education combined with high expectations will help students attain their greatest potential and close the achievement gap while preparing them for success in the 21st century.

2.2 School Vision Statement

The vision of Strong Start Academy Elementary School is a culturally diverse learning community that prepares children to excel academically in two languages and have a positive impact on an increasingly evolving and global society.

2.3 School Website and School Improvement Plan

For additional information about Strong Start Academy, please refer to the website at clvstrongstartes.org.

You may also wish to review the School Improvement Plan:
https://www.clvstrongstartes.org/wp-content/uploads/2026/08/Strong-Start-Academy-Elementary-School-Entire-Plan-w_-Notes-Addendums-3.pdf

3 Introduction

This manual serves as a reference for Strong Start Academy regarding the topic of McKinney-Vento.

3.1 Purpose

The purpose of the McKinney-Vento Policy and Plan is to define procedures and specify program elements to ensure equal participation in all education programs for homeless youth. An effective policy, plan, and program, ensures that all students have been provided with the necessary support and have been given the opportunity to meet all requirements for high school graduation.

3.2 Legal Requirements

Subtitle VI-B of The McKinney-Vento Homeless Assistance Act authorizes the federal Education for Homeless Children and Youth (EHCY) Program and is the primary piece of federal legislation related to the education of children and youth experiencing homelessness. It was reauthorized in December 2015 by Title IX, Part A, of Every Student Succeeds Act (ESSA).

Programs must be in compliance with Nevada Revised Statute (NRS) Chapter 385 and NRS Chapter 388 and the components that govern public schools. Additionally, Nevada's Senate Bill (SB) 147 (2019) resulted in additional provisions for homeless, unaccompanied, and foster care pupils that are codified in NRS388.205, NRS388A.489, and NRS389.320.

3.3 Board Approval

3.3.1 Board Approval

Each SPCSA school is required to have the McKinney-Vento/Homeless Policy and Plan approved by their school board.

This manual was approved on: October 9, 2025.

3.3.2 Stakeholders

The following stakeholders participated in the review and approval process of this plan:

- Lorna James-Cervantes: Board President
- Alicia Arroyo: Board Secretary
- Maria Tamayo Soto: Board Treasurer
- Alee Moore: Board Member
- Dachresha Harris: Board Member
- Angela Scurry: Board Member
- Roxann McCoy: Board Member
- Vanessa Mari: Board Member
- Kristie Cole: Board Member

3.4 Description

This manual contains information regarding:

- Definitions relevant to McKinney-Vento and homeless youth
- The rights of children and homeless youth.
- Dissemination of information regarding educational rights for homeless youth.
- Identification of homeless youth.
- School selection.
- Transportation.
- Disputes.
- Services provided.
- Free meals.
- Training.
- Coordination.
- Preschool.
- Full or partial credit requirements.

3.5 Definitions and Acronyms

Throughout this manual you will encounter a variety of terms that are relevant to this process. Additionally, some items may be referred to using acronyms. Please review the following items to familiarize yourself with the terminology and acronyms used throughout this manual.

- Child find:
  - In general All children with disabilities residing in the State, including children with disabilities who are homeless children or are wards of the State and children with disabilities attending private schools, regardless of the severity of their disabilities, and who are in need of special education and related services, are identified, located, and evaluated and a practical method is developed and implemented to determine which children with disabilities are currently receiving needed special education and related services.
- Every Student Succeeds Act (ESSA):
  - is the federal K-12 education law of the United States. ESSA was signed into law in 2015 and replaced the previous education law called “No Child Left Behind.” It is a reauthorization of the Elementary and Secondary Education Act (ESEA) of 1965.
- Homeless children and youths:
  - Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (per Title IX, Part A of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act) defines homeless as follows:
  - The term "homeless children and youths"--
    - (A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)); and
    - (B) includes--
      - (i) 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;*
      - (ii) 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 section 103(a)(2)(C));
      - (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
      - (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).
  - *Per Title IX, Part A of the Every Student Succeeds Act, "awaiting foster care placement" was removed from the definition of homeless on December 10, 2016; the only exception to his removal is that "covered states" have until December 10, 2017 to remove "awaiting foster care placement" from their definition of homeless.
- Infinite Campus (IC):
  - Infinite Campus is the Student Information System (SIS) used by all public schools in Nevada.
- McKinney – Vento:
  - The McKinney–Vento Homeless Assistance Act of 1987 is a United States federal law that provides federal money for homeless shelter programs. It was the first significant federal legislative response to homelessness and was passed by the 100th United States Congress and signed into law by President Ronald Reagan on July 22, 1987. The act has been reauthorized several times over the years, and now includes educational components. To read more about the McKinney-Vento Homeless Assistance Act, please view the materials from the National Center for Homeless Education (NCHE) at https://nche.ed.gov/legislation/mckinney-vento/.
- National Center for Homeless Youth (NCHE):

    - NCHE operates the U.S. Department of Education's technical assistance and information center for the federal Education for Homeless Children and Youth (EHCY) Program.
- Nevada Department of Education (NDE):
    - The Nevada Department of Education or NDOE, autonomous of the governor and the Nevada State Legislature, administers primary and secondary public education in the state of Nevada.
- Nevada Revised Statute (NRS):
    - The Nevada Revised Statutes are all the current codified laws of the State of Nevada. Nevada law consists of the Constitution of Nevada and Nevada Revised Statutes.
- School of Origin:
    - (i) IN GENERAL.-The term school of origin means the school that a child or youth attended when permanently housed or the school in which the child or youth was last enrolled, including a preschool. (ii) RECEIVING SCHOOL.-When the child or youth completes the final grade level served by the school of origin, as described in clause (i), the term 'school of origin' shall include the designated receiving school at the next grade level for all feeder schools.
- State Public Charter School Authority (SPCSA):
    - The State Public Charter School Authority (SPCSA) authorizes public charter schools across Nevada and is responsible for the oversight and monitoring of those schools to ensure positive academic outcomes for students and strong stewardship of public dollars.
- Unaccompanied Youth:
    - The McKinney-Vento Act defines unaccompanied youth as “a homeless child or youth not in the physical custody of a parent or guardian” [42 USC § 11434a(6)]. Taking a closer look at the definition, two conditions must be present for a child or youth to be considered an unaccompanied youth under the McKinney-Vento Act:
        (A) 1. The child’s or youth’s living arrangement meets the Act’s definition of homeless, and
        (B) 2. The child or youth is not in the physical custody of a parent or guardian.
    - To read more about unaccompanied youth, please view the materials from the National Center for Homeless Education at https://nche.ed.gov/wp-content/uploads/2018/10/youth.pdf
- US Department of Education (USED):
    - The U.S. Department of Education is the agency of the federal government that establishes policy for, administers, and coordinates most federal assistance to education.

4 Rights of Homeless Children and Youth

According to the NCHE whitepaper titled The Educational Rights of Children and Youth Experiencing Homelessness, in order to remove educational barriers for homeless children and youths, the McKinney-Vento Act mandates:

- immediate school enrollment and full participation in all school activities for eligible children, even when records normally required for enrollment are not available [42 U.S.C. § 11432(g)(3)(C)];
- the right of children and youths experiencing homelessness, including young homeless children attending public preschools, to remain in their school of origin (the school the student attended when permanently housed or the school in which the student was last enrolled), when in the child’s or youth’s best interest to do so [42 U.S.C. § 11432(g)(3)(A), 42 U.S.C. § 11432(g)(3)(B) and 42 U.S.C. § 11432(g)(3)(I) (i)];
- transportation to and from the school of origin at the request of the parent or guardian (or in the case of an unaccompanied youth, the local liaison)[42 U.S.C. § 11432(g)(1)(J)(iii)];
- provision of services comparable to services offered to other students in the school, including Title I services or similar State or local programs, educational programs for children with disabilities, and educational programs for English learners; career and technical education; programs for gifted and talented students; and school nutrition programs [42 U.S.C. § 11432(g) (4)];

- that homeless students have access to and receive educational services for which they are eligible, including services through Head Start programs, early intervention services under part C of the Individuals with Disabilities Education Act, and other preschool programs administered by the local educational agency [42 U.S.C. § 11432(g)(6)(iii)];
- removal of barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs for homeless students who meet relevant eligibility criteria [42 U.S.C. § 11432(g)(1)(F)(iii)];
- rights and protections specifically for unaccompanied youth (youth who are not in the physical custody of a parent or guardian) who are experiencing homelessness, including allowing them to be immediately enrolled without proof of guardianship [42 U.S.C. § 11432(g)(1)(H) (iv)];
- the right of parents, guardians, or unaccompanied youth to dispute an eligibility, school selection, or enrollment decision, and for a child or youth to be admitted to the school in which enrollment is sought, pending the resolution of the dispute [42 U.S.C. § 11432(g) (3)(E)]; and
- the appointment of a local homeless liaison in every school district or local education agency (LEA) to ensure that homeless children and youth are enrolled in and have a full and equal opportunity to succeed in school [42 U.S.C. § 11432(g)(1)(J)(ii) and2 U.S.C. § 11432(g)(6) (A)].

5 Dissemination of Educational Rights Information

The McKinney-Vento/Homeless Policy and Plan should be posted to the Strong Start Academy website for the school community to view. In addition, the school will have written materials in English and other languages spoken at the school that advise the school community of the rights of homeless youth. Written materials include but are not limited to:

- Posters and Flyers
  - Educational Rights Poster (Youth) from NCHE:
    - English
    - Spanish
  - Educational Rights Poster (Parent) from NCHE:
    - English
    - Spanish
  - Higher Education Poster from NCHE
    - English
    - Spanish
  - Support for Students Whose Families Have Lost Their Homes to Foreclosure poster from NCHE:
    - English
- Brochures
  - NCHE Brochure:
    - English
    - Spanish

    - Support for Students Whose Families Have Lost Their Homes to Foreclosure brochure from NCHE:
        - English
        - Spanish
- Booklets
    - Parent booklet from NCHE:
        - English
        - Spanish
- Email communication to the school community
- Information posted on the school website

The school will retain copies of all distributed materials as evidence for monitoring conducted by SPCSA and NDE, including materials that are printed from other sources such as NCHE.

6 Identification

To determine a student's McKinney-Vento eligibility, schools must determine whether a student's living arrangement meets the McKinney-Vento definition of homeless. In general, parents/guardians or unaccompanied youth should complete a Student Housing Questionnaire (SHQ) which may be electronic or a paper form.

6.1 Self-Identification

6.1.1 Online Registration

Upon registration, students may be identified as homeless through the online registration process in Infinite Campus which asks a questionnaire regarding housing status. Once identified as homeless, the student records should be updated appropriately in Infinite Campus to document the status of the student as homeless.

6.1.2 Other Identification Methods

Students may experience homelessness at any time throughout the school year. While a student may not necessarily be homeless at the time of online registration, they may become homeless at another point during the school year. Or, during registration the parent/guardian/unaccompanied youth may have not selected the option during online registration.

If a parent/guardian/student notifies the school at any time that the student is potentially experiencing homelessness, students should complete a Student Housing Questionnaire to determine eligibility. Once determined eligible per the McKinney-Vento definition of homeless, the student records should be updated appropriately in Infinite Campus to document the status of the student as homeless.

6.2 Staff Identification

School staff may also be particularly helpful in identifying homeless students. This can be via trusting relationships with a staff member, symptoms of homelessness noticed, by reviewing enrollment documents, and reviewing attendance records. If any school staff member has reason to believe that a student may be experiencing homelessness, they should reach out to the school McKinney-Vento Liaison so that the McKinney-Vento Liaison may reach out to the parent/guardian/unaccompanied youth to complete a Student Housing Questionnaire to determine eligibility. Once

determined eligible per the McKinney-Vento definition of homeless, the student records should be updated appropriately in Infinite Campus to document the status of the student as homeless.

6.3 Recording Homeless Status in Infinite Campus

Homeless status will be recorded in Infinite Campus by the Office Manager.

Homeless students must be correctly entered in Infinite Campus for a variety of purposes including grant eligibility and desktop monitoring. SPCSA must be able to accurately obtain data regarding the numbers of homeless students for reporting to NDE via Infinite Campus. Please use the instructions below to accurately identify homeless students in Infinite Campus.

1. In the Campus Tools menu on the "Index" tab, choose "Student Information" then click "Program Participation", then choose "Homeless" from the index that appears.
2. Locate the student using the search tab.
3. Once you have pressed "Go" on the screen shown, press "New" to enter the information for the homeless student. You must enter:
   - "Primary Night Time Residence"
   - "Start Date"
   - "End Date" should be entered as 07/31/YYYY where the year is the end of the current school year, as the status should continue through summer school, but end prior to the start of the new school year. If the student exits homeless status prior to the end of the school year, you may update the end date when notified.
   - If the student is an "Unaccompanied Youth" the option should be selected.
   - Be sure to save once you have entered the information.
4. Return to the "Index" tab and select "General". It will display the student "Summary" tab. Click the "Flags" tab.
5. On the "Flags" tab, press the "New" button to add the Homeless Flag for the student. You should enter a "Start Date" and "End Date".

7 School Selection

All public schools including charter schools must accept homeless students. Per page 17 of the Homeless Tool Kit for School Staff provided by NDE:

7.1 Immediate Enrollment

A school must **immediately** enroll a homeless student, even if the student does not have documents normally required for enrollment, such as academic and medical/immunization records or proof of residency. Once enrolled, the Homeless Education Liaison of the school must help the parent/guardian/unaccompanied youth obtain the necessary records and/or immunizations, and work with the parent/guardian/unaccompanied youth to determine appropriate placement in classes if records are not immediately available.

7.2 The Right to Choose What School to Attend

Students have the right to continue attending their "school of origin". The "school of origin" is the school where the child or youth was last enrolled or the school the child or youth was attending when they became homeless. The school district shall keep a student in the "school of origin" unless it goes against the wishes of the parent. The student also has the option of enrolling in school where he is currently living.

If the school district sends a student to a school other than the school of origin or a school requested by the parent, the district must provide the parent with a written explanation of the decision, which includes the right to appeal the decision to the NDE Homeless Liaison.

If a student obtains permanent housing during the school year, the student has the right to stay in their current school until the end of the school year.

All placement decisions must be made based on what is in the best interest of the student.

8 TRANSPORTATION

The transportation process in Nevada is specified by NDE on page 18 of the Homeless Tool Kit for School Staff. Charter schools are public schools which must follow the same processes. The following transportation process should be followed by all charter schools:

The parent or guardian (or, in the case of an unaccompanied youth, the school homeless liaison) of a homeless student may request that transportation be provided to and from school.

If the student is still in the same district as the school of origin, the school district must provide transportation.

If the student is not living within the district of the school of origin, the district of origin and the district where the student is living must determine how to share transportation costs and responsibility.

If the districts cannot come to an agreement, then the responsibility and costs must be shared equally. In general, transportation time should be limited to one hour or less in each direction.

Please note, the transportation provisions of McKinney-Vento only apply to students who are currently homeless. If a student obtains permanent housing and continues to attend his/her school of origin until the end of the school year, the continued provision of transportation is at the discretion of the district of origin.

Remember: The school district must make decisions based on the best interests of the student.

9 DISPUTES

The dispute resolution process in Nevada is specified by NDE on page 19 of the Homeless Tool Kit for School Staff. Charter schools are public schools which must follow the same processes. The following dispute resolution process should be followed by charter schools:

If a charter school challenges the right of a homeless student to attend the school, the charter school must continue to provide transportation and other services to the student until the dispute is resolved.

The dispute resolution process begins when the charter school challenges the student's enrollment/continued enrollment in school. The same day the charter school challenges the enrollment of the student, the district must notify the Homeless Liaison and the parent/guardian or unaccompanied youth in writing. This notice must include the right of the parent/guardian or unaccompanied youth to appeal the decision. The charter school must also notify the NDE Homeless Liaison/Coordinator the same day and provide them with copies of all notices provided to the parent/guardian or unaccompanied youth.

The NDE Liaison must then provide the parent/youth with a clear, easy-to-understand, written explanation of dispute resolution process and include the contact information for the NDE Homeless Liaison.

The school district then has two working days to determine whether it will continue to challenge the right of the student to be enrolled in school. During this time, NDE may provide technical assistance to the school on the requirements of McKinney-Vento.

The final decision by the charter school must be made in writing by the Superintendent (or Executive Director, or equivalent at the charter school) and must state all factual reasons and the legal basis for the decision. If the final decision of the charter school is adverse to the student, the charter school must provide the NDE homeless liaison (NDE

then notifies the parent) with a copy of the Rights of Homeless Students under the McKinney-Vento Act the written decision that same day. The parent/youth then has the right to appeal the decision to NDE.

Once NDE has received the appeal, the NDE Homeless Liaison has two working days to make a decision. The decision made by NDE Homeless Liaison is final.

10 Services

Homeless students have the same rights as all other students to participate in special education programs, after school programs, and any other programs available at the school.

10.1 Homeless Education Liaison

Every school is required to have a Homeless Education Liaison (often referred to as the McKinney-Vento Liaison). It is the job of the Liaison to ensure that homeless students have the same opportunities as all other students, which includes ensuring that homeless students are able to attend school, arranging for transportation in a timely manner, keeping the school staff informed of the rights of homeless students and providing appropriate referrals to service providers.

The homeless liaison at our school is:

Christine Nguyen
(702) 463-0222
cnguyen@clvstrongstartes.org

10.2 Special Education

Homeless students who qualify for special education services must be provided appropriate services based on the information that is available to the school. A school may not delay providing such services based on the non-receipt of school records. Homeless children are also included under child find requirements in the Individuals with Disabilities Education Act 20 U.S.C. 1412(a)(3).

10.3 After School Programs

Homeless students will be given access to Safekey and/or RTC bus passes to facilitate participation in afterschool programs.

11 Free Meals

Homeless students have the same rights as all other students to participate in school nutrition programs. The process for identifying eligibility for free or reduced price meals in Nevada is specified by NDE on page 18 of the Homeless Tool Kit for School Staff. Charter schools are public schools which must follow the same processes. The following processes for determining free meal eligibility should be followed by all charter schools:

In order to determine the eligibility for free or reduced price meals, school officials must accept documentation that the student is homeless from the local Homeless Education Liaison or the director of the homeless shelter where the student resides. If a student is temporarily residing with another household, the household size and income of the host family are not taken into consideration when determining the free meal eligibility for the homeless student. However, the host family may include the homeless family as household members if the host family is providing financial support to the family.

Additionally, according to page 3 of the NCHE whitepaper titled "Access to Food for Students Experiencing Homelessness" the following must occur after eligibility is determined:

Once the above documentation has been provided to the school nutrition program, the student must be directly certified. School meals personnel do not have discretion to decline directly certifying children who have been documented to be categorically eligible. If a school administrator knows that a child is homeless but is concerned that there may be a delay in obtaining documentation from the local liaison, the administrator may complete an application on behalf of the child so the child can begin receiving free meals immediately. The administrator must then follow up with the local liaison to obtain the needed documentation.

Once a child is certified as eligible to receive free school meals, eligibility remains in effect for the duration of the current school year and for up to 30 days after the first operating day of the subsequent school year or until a new eligibility determination is made in the new school year, whichever comes first.

12 Training

Training will be provided for the McKinney-Vento Liaison and for other school staff.

12.1 McKinney-Vento Liaison

The McKinney-Vento Liaison will attend webinars, conferences, and training offered by SPCSA, NDE, and NCHE based on the school's need. Our Safe School Professional has attended the following webinars during the first semester:

- MCKINNEY-VENTO 101: BASIC REQUIREMENTS OF THE MCKINNEY-VENTO ACT
- SUPPORTING THE EDUCATION OF UNACCOMPANIED STUDENTS EXPERIENCING HOMELESSNESS
- MCKINNEY-VENTO SCHOOL SELECTION RIGHTS
- DETERMINING MCKINNEY-VENTO ELIGIBILITY

Upon completion of all training, records will be retained documenting that the McKinney-Vento liaison has attended training annually as NDE may request these records for desktop monitoring.

12.2 Other School Staff

The school's McKinney-Vento Liaison will present training to school staff as needed.

Upon completion of all training, records will be retained documenting that school staff has attended training annually as NDE may request these records for desktop monitoring.

13 Coordination

13.1 Coordination with Local Social Service Agencies

The school's McKinney-Vento Liaison will coordinate with other service providers, including public and private child welfare and social service agencies; law enforcement agencies; juvenile and family courts; agencies providing mental health services; domestic violence agencies; child care providers; runaway and homeless youth centers; providers of services and programs funded under the Runaway and Homeless Youth Act; and providers of emergency, transitional, and permanent housing, including public housing agencies, shelter operators, and operators of transitional housing facilities.

13.2 Records Sharing and Transfer

The McKinney-Vento Liaison will assist whenever possible with records sharing and transfer. The Liaison will work with the Office Manager to immediately enroll a child or youth even if he or she is unable to provide records normally required for enrollment or has missed application or enrollment deadlines during any period of homelessness; contact the last school attended to obtain relevant records if enrolling a homeless child or youth; assist with obtaining immunization records, other health records, or immunizations, if needed. The Liaison will also make any record ordinarily kept by the school available when a child or youth enters a new school or school district. They will provide records immediately for a homeless student when requested by a new school to expedite appropriate placement. Information about a student's living situation will only be disclosed to other school administrators and school staff on an as needed basis.

14 Preschool

According to page 4 of the NCHE whitepaper titled Early Care and Education for Young Children Experiencing Homelessness:

The McKinney-Vento Act requires early care and education programs administered by SEAs and LEAs to enroll children immediately, even if they lack documents typically required for enrollment, including birth certificates, health records, and proof of residency. The Act, however, does not require these programs to exceed legal capacity limits or to enroll children once classes are full.

While our school does not currently offer a preschool program, the nearest preschool program is available at:

Strong Start Early Learning Academy
1617 Alta Drive
Las Vegas, NV 89106
(702) 954-4777

15 Full or Partial Credit Requirements

Our school does not currently offer a middle school or high school program and is not subject to full or partial credit requirements.

16 References

Throughout this manual a variety of resources are referenced from NCHE and the NDE Homeless Tool Kit for School Staff.

Additional reference materials have all been linked in within the text of this manual, and will be listed in "Appendix A: Links" of this manual.

17 Appendix A: Links

A variety of links have been provided throughout this manual and are listed below in the order that they appear in this manual:

- Subtitle VI-B of The McKinney-Vento Homeless Assistance Act

  - https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim
- Every Student Succeeds Act (ESSA)
  - https://www.govinfo.gov/content/pkg/PLAW-114publ95/pdf/PLAW-114publ95.pdf
- NRS Chapter 385
  - https://www.leg.state.nv.us/nrs/nrs-385.html
- NRS Chapter 388
  - https://www.leg.state.nv.us/nrs/nrs-388.html
- Nevada SB147 (2019)
  - https://www.leg.state.nv.us/Session/80th2019/Bills/SB/SB147_EN.pdf
- NRS 388.205
  - https://www.leg.state.nv.us/nrs/nrs-388.html#NRS388Sec205
- NRS 388A.489
  - https://www.leg.state.nv.us/nrs/NRS-388A.html#NRS388ASec489
- NRS 389.320
  - https://www.leg.state.nv.us/nrs/nrs-389.html#NRS389Sec320
- Definition of McKinney-Vento from NCHE
  - https://nche.ed.gov/legislation/mckinney-vento/
- Information regarding unaccompanied youth from NCHE
  - https://nche.ed.gov/wp-content/uploads/2018/10/youth.pdf
- NCHE Whitepaper: The Educational Rights of Children and Youth Experiencing Homelessness
  - https://nche.ed.gov/wp-content/uploads/2018/10/service_providers.pdf
- Educational Rights Poster (Youth) from NCHE
  - English: https://nche.ed.gov/wp-content/uploads/2019/01/youthposter_eng_color.pdf
  - Spanish: https://nche.ed.gov/wp-content/uploads/2019/01/youthposter_sp_color.pdf
- Educational Rights Poster (Parent) from NCHE
  - English: https://nche.ed.gov/wp-content/uploads/2019/01/parentposter_eng_color.pdf
  - Spanish: https://nche.ed.gov/wp-content/uploads/2019/01/parentposter_sp_color.pdf
- Higher Education Poster from NCHE
  - English: https://nche.ed.gov/wp-content/uploads/2018/11/he_poster.pdf
  - Spanish: https://nche.ed.gov/wp-content/uploads/2018/11/he_poster_span.pdf
- Support for Students Whose Families Have Lost Their Homes to Foreclosure poster from NCHE
  - English: https://nche.ed.gov/wp-content/uploads/2018/11/fc_post.pdf
- NCHE Brochure:
  - English: https://nche.ed.gov/wp-content/uploads/2022/08/NCHE-Brochure-ENG.pdf
  - Spanish: https://nche.ed.gov/wp-content/uploads/2022/08/NCHE-Brochure-SPA.pdf
- Support for Students Whose Families Have Lost Their Homes to Foreclosure brochure from NCHE
  - English: https://nche.ed.gov/wp-content/uploads/2018/11/fc_broch.pdf
  - Spanish: https://nche.ed.gov/wp-content/uploads/2018/11/fc_broch_esp.pdf
- Parent booklet from NCHE
  - English: https://nche.ed.gov/wp-content/uploads/2022/08/Parent-Booklet-Eng.pdf
  - Spanish: https://nche.ed.gov/wp-content/uploads/2022/08/Parent-Booklet-Span.pdf
- Student Housing Questionnaire
  - https://spcsa.instructure.com/courses/42/files/2312?module_item_id=2142
- NDE Homeless Tool Kit for School Staff

  - https://doe.nv.gov/uploadedFiles/ndedoenvgov/content/Homeless/Homeless%20Tool%20Kit%20for%20School%20Staff%202022%20-2023_April-Draft.pdf
- NCHE Whitepaper – Access to Food for Students Experiencing Homelessness
  - https://nche.ed.gov/wp-content/uploads/2022/08/Access-to-Food.pdf
- NCHE Whitepaper – Early Care and Education for Young Children Experiencing Homelessness
  - https://nche.ed.gov/wp-content/uploads/2019/09/Early-Care-and-Education-for-Young-Children-Experiencing-Homelessness.pdf
- NCHE
  - https://nche.ed.gov/

18 Appendix B: Forms

- Student Housing Questionnaire (SHQ)
  - https://spcsa.instructure.com/courses/42/files/2312?module_item_id=2142

English Learner Policy and Plan Strong Start Academy

CONTENTS

Stron Start Academy 1

1 About Strong Start Academy 4

1.1 School Mission Statement 4

1.2 School Vision Statement 4

1.3 School Website and School Improvement Plan 4

2 Introduction 4

2.1 Purpose 4

2.2 Philosophy 5

2.3 Legal Requirements 5

2.4 Board Approval 6

2.4.1 Board Approval 6

2.4.2 Stakeholders 6

2.5 Description 6

2.6 Desired outcomes 7

2.7 Definitions and Acronyms 7

3 The EL Bill of Rights 9

4 Identification of English Learner (EL) Students 10

4.1 Home Language Survey 10

4.2 Prior School Records 10

4.3 Screening Assessment 11

4.4 Placement and Opt Out 11

4.5 Screening, Placement, and Exit, Records 11

5 Assessment 12

5.1 State Assessments 12

5.1.1 Placement/Screener Assessment 12

5.1.2 English Language Proficiency Assessment (ELPA) 12

5.2 Local Assessments 13

6 Equitable Access 13

6.1 Use of Data 14

6.1.1 Placement 14

6.1.2 Exit 14

6.1.3 Monitoring of Exited ELs 14

6.1.4 Additional School Level Data 15

6.2 Leadership and Staffing 15

6.3 Curriculum 15
6.4 Professional Development 17
6.5 Other Educational Programs for ELs 18
7 English Learners with Disabilities 19
8 Parent Communication and Participation 20
8.1 Ensuring Meaningful Communication with Limited English Proficient Parents 20
8.2 Parent Notifications 20
8.3 Parent Participation 21
9 References 21
10 Appendix A: Links 21
11 Appendix B: Forms and Documents 23

1 About Strong Start Academy

Strong Start Academy is a dual language charter school that offers a 50/50 dual-language education model in which students spend 50% of their day learning in English and 50% of their day learning in Spanish. Academic instruction occurs in both languages. Students alternate learning in two languages between morning and afternoon and between content areas. The three goals at Strong Start Academy are: 1) Build bilingual and biliteracy in all students. 2) Ensure students are on or above grade level. 3) Promote positive cross-cultural attitudes and behaviors.

1.1 School Mission Statement

The mission of Strong Start Academy Elementary School is to provide equitable, high-quality academics as we prepare our bilingual, civic-minded thinkers to maximize their potential in their community and the world. SSAES is committed to building a culture of high academic achievement for all students. All children will engage in dual language education that supports and embraces the development of English and Spanish while honoring their home languages and cultures. SSAES will offer rich linguistic and cultural education that values and develops families' cultural heritages and home languages as assets. Providing an enriched multilingual education combined with high expectations will help students attain their greatest potential and close the achievement gap while preparing them for success in the 21st century.

1.2 School Vision Statement

The vision of Strong Start Academy Elementary School is a culturally diverse learning community that prepares children to excel academically in two languages and have a positive impact on an increasingly evolving and global society.

1.3 School Website and School Improvement Plan

For additional information about the Strong Start Academy, please refer to the website at clvstrongstartes.org.

You may also wish to review the School Performance Plan: SSAES School Improvement Plan

2 Introduction

This manual serves as a reference for Strong Start Academy regarding the topic of English Language Learners.

2.1 Purpose

The purpose of the EL Policy and Plan is to define procedures and specify program elements that provide English language acquisition for all English Learners at a level that ensures equal participation in all education programs. An effective policy, plan, and program, ensures the mastery of English literacy skills to meet all requirements for high school graduation.

2.2 Philosophy

At Strong Start Academy we believe in dual language instruction, which is a bilingual education model that uses two languages, the students' native language and English, as the means of instruction. Our dual language program serves both language-minority students as well as native English speaking mainstream students. We subscribe to a "maintenance" philosophy of bilingual instruction which is intended to promote the development, enrichment and preservation of both target languages and as such, promotes additive bilingualism. This process involves adding second language skills to a person's linguistic repertoire in a context where both languages and cultures are equally valued. At Strong Start we believe:

- Multilingualism, multiliteracy, and multiculturalism are assets.
- Students' home, school, and community experiences influence their language development.
- Home languages, cultures, and experiences are valuable learning tools. Students' languages and cultures are valuable resources to be tapped and incorporated into schooling.
- Students' academic language development in their native language facilitates their academic language development in English. Conversely, students' academic language development in English informs their academic language development in their native language.
- Language is an integral part of teaching and learning.
- All teachers are language teachers and learners.
- Students learn language and culture through meaningful use and interaction.
- Students develop language proficiency in listening, speaking, reading, and writing interdependently, but at different rates and in different ways.
- Students' development of social, instructional, and academic language, a complex and long-term process, is the foundation for their success in school.
- Acquisition of language is a life-long process and is a key factor in developing self-identity, intrapersonal skills, and interpersonal skills.
- All students should have the opportunity to learn and use more than one language to encourage the development of the SSAES attributes of being open-minded, a risk-taker, and a communicator.
- Language learning enhances global understanding and develops sociocultural competence.
- Translanguaging strategies help students make meaning of content and language across languages.
- Transdisciplinary, inquiry-based learning with differentiated language tools and strategies develops academic knowledge, language, and skills in meaningful ways.

SSAES Dual Language Guiding Principles:

- 1. Effective programs have equitable access and are based on both standards and current research.
- 2. Effective instruction meets the needs of culturally and linguistically diverse students.
- 3. Effective on-going family involvement is integral to student success.
- 4. Effective professional development improves teaching through the integration of language and content.

2.3 Legal Requirements

All schools are required to have an English Learner (EL) Policy and Plan per Nevada Revised Statute (NRS) 388.407. SPCSA schools will comply with obligations under the Equal Educational Opportunities Act of 1974, 20 U.S.C.§ 1703(f) as well as Title VI of the 1964 Civil Rights Act 20 U.S.C § 2000d et seq., and its implementing regulations at 34 C.F. R. part 100. Programs must be in compliance with NRS Chapter 385 and NRS Chapter 388 and the components that govern public schools. These programs and procedures must also be in compliance with Title III of the Every Student Succeeds Act (ESSA) of 2015, Public Law 114-95. Additionally, this document provides instructions regarding compliance with Nevada Assembly Bill (AB) 195 from the 2021 legislative session that is known as the English Learner Bill of Rights.

2.4 Board Approval

2.4.1 Board Approval

Each SPCSA school is required to have the EL Policy and Plan approved by their school board.

This manual was approved on: September 10, 2026

2.4.2 Stakeholders

In addition to the board approval date, a list of names and roles of stakeholders who participated in the review process should be clearly noted in the EL Policy and Plan.

The following stakeholders participated in the review and approval process of this plan:

- Lorna James-Cervantes: Board President
- Alicia Arroyo: Secretary
- Maria Tamayo Soto: Treasurer
- Dachresha Harris: Board Member
- Alee Moore: Board Member
- M. Angela Scurry: Board Member
- Roxann McCoy: Board Member
- Kristie Cole: Board Member
- Vanessa Mari: Board Member

2.5 Description

This manual contains:

- Information regarding the EL Bill of Rights.
- Information regarding the identification of EL students.

- Information regarding the Assessment of EL students.
- Information regarding eliminating achievement gaps and ensuring equitable access through:
    - Data.
    - Leadership and staffing.
    - Research-based curriculum.
    - Professional development/professional learning
    - Other educational programs for ELs
- Information regarding EL students with disabilities.
- Information regarding required parent communication and participation.
- Student participation in other educational programs.
- Links to all resources identified in this manual.
- Forms and documents used in conjunction with the EL program at the school.

2.6 Desired outcomes

There are several desired outcomes that result from implementing a successful EL program within a school. It is desired that within our school:

- The EL Program is aligned with their goals and schoolwide plan to ensure equal access to the educational opportunities afforded to all students.
- All EL Students will attain proficiency and fluency in the English Language.
- All EL students will benefit from the educational programs available within their school.
- All EL students will achieve proficiency and mastery of content area curriculum.
- All EL students will graduate high school as college and career ready.
- All EL students will excel to high standards.
- The school will implement research-based, comprehensive, and aligned English language development curriculum for EL students.
- All teachers of EL students will utilize appropriate strategies for EL language instruction and participate in ongoing professional development to ensure quality instruction.
- The socio-emotional needs of EL students will be considered in schools in conjunction with language development and academic needs.
- The school will partner with parents and families through effective communication and a variety of opportunities for families to have input on topics relevant to their families.

2.7 Definitions and Acronyms

Throughout this manual you will encounter a variety of terms that are relevant to this process. Additionally, some items may be referred to using acronyms. Please review the following items to familiarize yourself with the terminology and acronyms used throughout this manual.

- English Language Acquisition and Development (ELAD) Endorsement: Teachers with the ELAD endorsement on their teacher license have extended knowledge of the theories of second language acquisition, contemporary issues related to the education of English language learners and emergent bilinguals, assessment of language learning, and methods for supporting the academic language development of linguistically diverse students. This endorsement is formerly known as the Teach English as a Second Language (TESL) endorsement.
- English Learner (EL) student: Refers to a student who has been determined to be an English Language Learner or Limited English Proficient (LEP) and is therefore entitled to receive services to overcome language barriers that impede his/her equal and meaningful participation in the school's instructional programs. English learner student-Speakers of other languages who are learning English; refers to learners who are identified as still in the

process of acquiring English as an additional language. English Learner students may also be referred to as English Language Learners (ELLs) as this is the acronym used by WIDA for their assessment suite.

- English Language Proficiency: The level of competence at which an individual can use language for both basic communicative tasks and academic purposes.
- English Language Proficiency Assessment (ELPA): English Language Proficiency Assessment- umbrella term used by the Nevada Title III Office to identify the annual English language proficiency assessment given to English language learners. Currently the ELPA assessment in Nevada is the WIDA ACCESS.
- Every Student Succeeds Act (ESSA): is the federal K-12 education law of the United States. ESSA was signed into law in 2015 and replaced the previous education law called “No Child Left Behind.” It is a reauthorization of the Elementary and Secondary Education Act (ESEA) of 1965.
- Evidence Based Interventions (EBI): Evidence-based interventions (EBI) are practices or programs that have evidence to show that they are effective at producing results and improving outcomes when implemented.
- Exited ELL: Refers to a student who was formerly an ELL but subsequently met the criteria for exiting the ELL Program based on a valid and reliable assessment of the student's English proficiency in each of the four (4) domains of speaking, listening, reading, and writing. An exited ELL is entitled to receive monitoring of his/her academic progress to determine whether the student has and maintains a sufficient level of English proficiency to succeed in mainstream classes without language acquisition services.
- Home Language: Language spoken in the home by caregivers and siblings who reside in the child’s home; sometimes used as a synonym for primary language or native language.
- Home Language Survey (HLS): A screening tool used by schools upon student registration that determines languages that are spoken by the students.
- Individualized Education Program (IEP): A legal document under United States law that is developed for each public school child in the U.S. who needs special education. It is created through a team of the child's parent and district personnel who are knowledgeable about the child's needs.
- Individuals with Disabilities Education Act (IDEA): The Individuals with Disabilities Education Act (IDEA) is a law that makes available a free appropriate public education to eligible children with disabilities throughout the nation and ensures special education and related services to those children.
- Infinite Campus (IC): Infinite Campus is the Student Information System (SIS) used by all public schools in Nevada.
- Limited English Proficient (LEP): A federal term for English language learners who receive services and are tested from Title III funds. This term is being replaced with the term English Learner (EL).
- Language Instruction Educational Program (LIEP): a legal requirement for districts with students who are in the process of learning English as an additional language. A LIEP must be identified for each student.
- Model of Instruction (MOI): The LIEP is based on choosing an appropriate Model of Instruction (MOI) for each student. A list of models that may be used in the state of Nevada from the NDE is found on the document titled Language Instruction Educational Program (LIEP) Models in Nevada. One model of instruction should be selected for each student and when entered in Infinite Campus, the appropriate code should be entered from the list.
- Multi-Tiered System of Support (MTSS): MTSS stands for multi-tiered system of supports. It's a framework many schools use to give targeted support to struggling students.
- Native language: Primary or first language spoken by an individual.
- Nevada Department of Education (NDE): The Nevada Department of Education or NDOE, autonomous of the governor and the Nevada State Legislature, administers primary and secondary public education in the state of Nevada.
- Nevada Revised Statute (NRS): The Nevada Revised Statutes are all the current codified laws of the State of Nevada. Nevada law consists of the Constitution of Nevada and Nevada Revised Statutes.
- Section 504 of the Rehabilitation Act of 1973: Section 504 forbids organizations and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits and services. It defines the rights of individuals with disabilities to participate in, and have access to, program benefits and services.

- Section 504 Plan: 504 plans are formal plans that schools develop to give kids with disabilities the support they need. That covers any condition that limits daily activities in a major way.
- Smarter Balanced Assessment Consortium (SBAC) Assessment: Adopted by the Nevada Department of Education, to measure K-8 students achievement of the Nevada Academic Core Standards (NVACS). The assessment system includes a rigorous computer adaptive summative test for grades 3-8 that provides accurate student performance and growth information to meet state and federal accountability requirements. In addition, optional computer adaptive interim assessments and formative resources aligned to the NVACs give teachers and principals the tools to help students meet today's college- and career-ready standards.
- State Public Charter School Authority (SPCSA): The State Public Charter School Authority (SPCSA) authorizes public charter schools across Nevada and is responsible for the oversight and monitoring of those schools to ensure positive academic outcomes for students and strong stewardship of public dollars.
- Statewide Plan for the Improvement of Pupils (STIP): Nevada law requires the State Board of Education to develop a 5-year strategic plan to improve the achievement of students enrolled in public schools across Nevada, officially referred to as a "Statewide Plan for the Improvement of Pupils". We often abbreviate this to "STIP". The Board must submit this plan, or a revised plan, on or before March 31 of each year. The STIP is prepared for the State Board's consideration by the Nevada Department of Education (NDE) and reflects feedback and input gathered from school districts, education partners, and stakeholders across the State. (These requirements are outlined in Nevada Revised Statutes (NRS) 385.111-113).
- Title III: Language Instruction of Limited English Proficient Students and Immigrants (2002). Title III under ESSA consolidates 13 bilingual, immigrant, and Native American education programs formerly known as Title VII (1994). The focus of the title is on assisting school districts in teaching English to EL students and helping EL students meet state academic standards.
- US Department of Education (USED): The U.S. Department of Education is the agency of the federal government that establishes policy for, administers, and coordinates most federal assistance to education.
- WIDA: Consortium joined by Nevada Department of Education that provides the state ELPA test, known as ACCESS, and provides extensive professional development on the comprehensive ELP standards that address the need for students to become fully proficient in both social and academic English.
- Dual Language Program: Also known as Two-way Immersion / Developmental Bilingual Program. The goal of these programs is for students to develop language proficiency in two languages by receiving instruction in English and another language in a classroom that is usually comprised of an equal number of native English speakers and speakers of the other language.

3 The EL Bill of Rights

Assembly Bill (AB) 195 from the 2021 legislative session requires information sharing by charter schools. This bill is also referred to as the "English Learner Bill of Rights". The full text of this legal requirement may be viewed by clicking the link in section 2.2 Legal Requirements, or section 6 of this manual that provides a summary of all links. As a result of this bill, schools must:

1. Provide parents of English Learners with a copy of the "English Learner Pupil and Parent Rights" and post the document to the school website.
    a. This information should be provided in English and in the parent's primary language upon enrollment or identification as an English learner. For students who did not receive this documentation at the time of enrollment or identification as an English learner, provide this documentation as soon as possible. When posted to the website, it should be posted in as many languages as possible, and at minimum, all the languages provided by NDE. These documents may be downloaded from https://spcsa.instructure.com/courses/42/modules/items/537 in multiple languages.

2. Post information to the school's website regarding the use of Title III funds.
    a. Schools must post to the website (and update annually), Post to your school's website (and update annually), information related to the way the school has used funds received pursuant to Title III of the Every Student Succeeds Act (ESSA) of 2015. This information must be organized into categories of programs and services that the funds were used for, including the engagement of parents and families.
3. Include the following items in the school's EL Policy and Plan:
    a. Provisions for the identification of the primary language of each pupil enrolled in the school district at the beginning of each school year to assist in the identification of pupils who are English learners
    b. Provisions that ensure English learner students remain in a program for English learners until the pupil obtains language proficiency based on an appropriate assessment for pupils who are English learners, unless the parent or legal guardian of the pupil declines for the student to remain placed in a program for English learners.
4. A variety of data collection requirements are included as a part of the EL Bill of Rights. Schools must maintain accurate records in Infinite Campus at all times so that data is readily available when requested from SPCSA or NDE.

4 Identification of English Learner (EL) Students

All public schools are required to identify English Learner (EL) Students. Identification and Placement information can be found on the Nevada WIDA site in the "Nevada English Language Learner Identification and Placement Guidance Document" regarding identification and placement procedures.

4.1 Home Language Survey

Nevada requires a Home Language Survey (HLS) to be administered upon initial registration to all students [SBE3(a)(i), OCR & DOJ-Title VI 1964 and EEOA 1974, ESSA 3113(b)(2), NRS388.407(2)(a)].

The HLS may be issued online or by paper form. The results of the HLS should be recorded in Infinite Campus.

A template HLS is available at: https://spcsa.instructure.com/courses/42/modules/items/969

The HLS must include three basic questions to determine:

1. The native or first language of the child.
2. The language(s) spoken at home.
3. The language(s) used when speaking with peers.

If a language other than English is indicated for any of the questions on the HLS, the child must be screened to determine EL status.

At our school, the HLS is issued during the Online Registration process through Infinite Campus. All three languages should be entered for any student who has listed at least one language that is not English in any of the three fields. A student who requires screening should have "Pending" placed in Infinite Campus for their EL status by the school's ELL Coordinator, until they have taken the screener.

4.2 Prior School Records

One component of screening is prior school records. If a student has indicated a language other than English on the HLS and records from a student's previous school indicate an EL designation, the student should continue as EL if the student did not exit EL status at their previous school. Students who are continuing as EL from a previous school should not take the screener, they should be designated as EL.

If a student has indicated a language other than English on the HLS but records indicate that the student has exited EL with proper test scores, the student should not take the screener. They should be designated as a former EL as it is required to monitor former EL students for four years after exiting EL status. Students who have been exited for more than 4 years do not need to be monitored.

4.3 Screening Assessment

Students who were identified as speaking a language other than English by the HLS, must take the K-12 WIDA Screener to determine if they should be designated as an EL student.

The screener will be administered at our school by the ELL Coordinator.

4.4 Placement and Opt Out

Upon completion of the screening assessment, students should be designated as EL students according to the "Identification/Placement Criteria" found on the Nevada WIDA website, in the document called "Nevada English Language Learner Identification and Placement". Placement criteria is determined by NDE.

Upon completion of the screening assessment, the EL status in Infinite Campus should be updated from "Pending" to reflect the status of the student.

- If a student is eligible for services based on the screening assessment, the ELL Coordinator will enter the student's EL Program status in Infinite Campus as EL and enter the "Identified Date".
- If a student is not eligible for services based on the screening assessment, the ELL Coordinator will enter the student's EL Program status in Infinite Campus as "Not EL" and enter the "Identified Date".

All EL students are entitled to services. However, parents may choose to opt their children out of a school district's EL program or out of particular EL services within an EL program. Per the EL DCL Fact Sheet from the United States Department of Education (USED):

- School districts may not recommend that parents opt out for any reason. Parents are entitled to guidance in a language that they can understand about their child's rights, the range of EL services that their child could receive, and the benefits of such services. School districts should appropriately document that the parent made a voluntary, informed decision to opt their child out.
- A school district must still take steps to provide opted-out EL students with access to its educational programs, monitor their progress, and offer EL services again if a student is struggling.

At our school, if a parent chooses to opt out, the ELL Coordinator will update the EL status in Infinite Campus to reflect that the parent has chosen to opt the student out from services.

4.5 Screening, Placement, and Exit, Records

Accurate records of screening, placement, and exit, for EL students must be maintained in Infinite Campus. NDE hosted several data workshops in May 2021 regarding best practices for data entry. It is highly recommended that schools view the recordings so that data is entered correctly, as these data workshops demonstrate how to enter all data that is required by NDE. A link to the recordings and the data workshop files are available using the links below.

- NDE EL Data Workshop Recordings
- NDE EL Data Workshop Zip Files

EL student records in Infinite Campus will be reviewed and updated on an ongoing basis. At our school, the ELL Coordinator is responsible for checking and entering/updating the following records for EL students in Infinite Campus:

1. Birth Country (should be entered for all students at the school regardless of EL status)
2. Date entered US (should be entered for all students regardless of EL status if the birth country is not the US)
3. Date entered US School (should be entered for all students regardless of EL status if the birth country is not the US)
4. First Language, Home Language, Language with Friends (should be entered for any student who identified a language other than English on the HLS in any field. All three items should be entered on the for these students even if some of the languages are specified as English)
5. EL Program Status (Pending, EL, Not EL, Exited EL-Reg, Exited EL-Alt)
6. Identified date (entered after the initial date that the student is deemed eligible by WIDA screener scores)
7. Exit date (entered after the student has received a proficient score on WIDA or is able to exit by Alternate criteria)
8. Parent Notified (should be updated annually when annual notifications are sent)
9. Parent declined (if the parent declines services check the box and enter the date)
10. EL Assessments (Most recent scores should be entered)
11. EL Services (A model of instruction should be selected for each student as this information is required by NDE and USED for the LIEP. Only one should be selected per student, and the start date should be the date of enrollment for the current school year. Refer to the Language Instruction Educational Program (LIEP) Models in Nevada document for the appropriate coding of the program(s) used at your school.)

5 Assessment

Once students have been screened and they are designated as EL students, a variety of assessments should be used that provide for the periodic reassessment of English proficiency and applicable content assessments of each EL qualified student.

5.1 State Assessments

5.1.1 Placement/Screener Assessment

Nevada uses the WIDA Screener (for Grades K-12) to identify English language learners (ELLs).

5.1.2 English Language Proficiency Assessment (ELPA)

5.1.2.1 About the ELPA

The ELPA for the state of Nevada is the WIDA ACCESS for ELLs. This is the summative assessment. ACCESS for ELLs Online must be given to all EL students who are enrolled during the annual testing window, which typically lasts from early January through early March. The applicable assessment is administered annually to monitor students' progress in acquiring academic English. All ELs enrolled during the testing window must be assessed with the WIDA ACCESS 2.0., Kindergarten ACCESS, or Alternate ACCESS.

- Students in grades K-12 who have been identified as ELs take the WIDA ACCESS.
- Students with IEPs who take the WIDA ACCESS should be provided appropriate testing accommodations consistent with the accommodations listed in the IEP that have been determined by the IEP team. Information from WIDA regarding accommodations can be found in the following documents:
    - WIDA Accessibility and Accommodations Manual
    - ACCESS Online Accommodations Checklist
    - Kindergarten ACCESS Accommodations Checklist
    - Alternate ACCESS Accommodations Checklist

- The Alternate ACCESS for ELLs is designed to measure language proficiency of students with most significant cognitive disabilities per the students' Individual Education Plan (IEP). Students with Individualized Education Programs (IEPs) may take WIDA Alternate ACCESS per the decision of the student's IEP team. IEP teams should follow their state's specific alternate assessment participation criteria. For additional guidance, view the Alternate ACCESS for ELLs Participation Criteria Decision Tree.

5.1.2.2 Administration and Scoring of the ELPA

The administration of the ELPA should be conducted per NDE Guidelines. The Testing Coordinator at each school is responsible for ensuring all procedures are followed per NDE adopted protocols. The ELPA is a high-stakes test requiring test security training and supervision by site administration, and it is required for irregularities to be reported per NDE guidelines. The WIDA The ACCESS for ELLs Checklist that is located on the Nevada WIDA site provides the guidelines that should be followed including:

- Procedures regarding how the test should be administered.
- Guidelines for what personnel should conduct each step of administration.
- Training courses that demonstrate how to administer the Online ACCESS, Alternate ACCESS for ELLs, Kindergarten ACCESS for ELLs.

The Kindergarten ACCESS and the WIDA Alternate ACCESS assessments are scored by the test administrator at the school. The Alternate ACCESS for ELLs: Administration and Scoring training course that is found on the ACCESS for ELLs Checklist includes important information about administering the Alternate ACCESS Field Test. All Alternate ACCESS Test administrators must complete the Alternate ACCESS For ELLs Administration and Scoring training course and pass the certification quiz. The Online ACCESS for grades 1 – 12 is scored by the testing company, DRC.

Upon receipt of the scores the school must:

- Enter results for all students in Infinite Campus
- Communicate with the student's parents/family members regarding test results.

At our school, WIDA scores are entered into Infinite Campus by the ELL Coordinator. Notifications regarding test results are sent annually to parents/guardians by US Mail by the ELL Coordinator by the ELL Coordinator. The date of the notification is recorded in Infinite Campus by the ELL Coordinator.

5.2 Local Assessments

In addition to state assessments, SPCSA schools conduct:

- Formal Interim assessments which are chosen at the school level which are relevant to the school's instructional programs.
- Informal assessments and evaluations which evaluate EL students' Academic Language Acquisition Progress are chosen at the school level and are relevant to the school's instructional programs.
- Classroom assessments that are chosen at the school level and are relevant to the school's instructional programs.

Our school uses the following assessments:

- Formal Interim Assessments:
    - i-Ready - is a web-based adaptive diagnostic assessment and instruction program. i-Ready assesses students' reading skills to the sub-domain level, prescribing differentiated Common Core instruction so learners of all abilities can achieve success.
    - ENIL & IRLA - Delivers specific, actionable data that tells the teacher where a student is, why, and the sequence of skills/behaviors needed to learn next to accelerate reading growth.

- Imagine Learning - Imagine Learning's assessments enable educators to drive student growth by offering multiple research-based measures of student progress. Through the use of their personalized learning programs language and literacy skills are accelerated and developed side by side.

6 Equitable Access

Schools should design programs that eliminate achievement gaps and ensure equitable access to educational programs. The use of data, leadership and staffing, research-based curriculum, and professional development all are components of designing a program that provides equitable access. Additionally, schools should work to reduce any barriers that would prevent any student from fully participating in the school.

6.1 Use of Data

6.1.1 Placement

Data from the WIDA Screener is used for designating EL students as described in section 4.4 of this manual. Additionally, per the EL DCL Fact Sheet from the United States Department of Education (USED), School districts generally may not segregate students on the basis of national origin or EL status. Although certain EL programs may be designed to require that EL students receive separate instruction for a limited portion of the day or period of time, school districts and states are expected to carry out their chosen program in the least segregative manner consistent with achieving the program's stated educational goals.

6.1.2 Exit

The criteria for a student to exit from an EL program is specified by NDE and has been updated for the 2024 – 2025 school year. Beginning in 2024 – 2025, students may qualify for exit by receiving a qualifying score on WIDA or through an alternate pathway. Students should be exited as EL students according to the "Exit Criteria" found on the Nevada WIDA website, in the document called "Nevada English Language Learner Identification and Placement" in the section of the document titled "Identification and Placement." When a student has met the criteria for exit, the exit date recorded in Infinite Campus should be the last day of student attendance for the school year in which the student received a qualifying score to exit. A notification letter should be sent to parents at the beginning of the following school year, that the student has been exited.

When a student qualifies for exit, the score and exit date will be entered into Infinite Campus by the ELL Coordinator. The status will be updated in Infinite Campus to "Exited EL – REG" or "Exited EL – ALT" dependent on whether the student exited by regular WIDA scores or by the alternate pathway by the ELL Coordinator. The notification letter will be sent to parents by the ELL Coordinator and the "Parent Notified" date in Infinite Campus will be updated to reflect the date that the parent was notified of exit at the beginning of the following school year.

6.1.3 Monitoring of Exited ELs

Exited ELs must be monitored per ESSA requirements and should be designated as Exited ELs in Infinite Campus. After 4 years monitoring is no longer required in Nevada. During the monitoring years, if the student is not making satisfactory academic progress on school level assessments including low scores on interim/benchmark assessments, D/F quarterly/semester grades, or other school assessments, then student needs should be assessed. If the results of the needs assessment show that the student is not making satisfactory progress because of a language barrier, the student should continue to receive EL services and a parent notification should be sent.

The academic progress of all EL students will be monitored using the i-Ready Assessment in ELA and Math three times throughout the year. The results of the benchmark assessments will be used to identify students that are not on grade level or that are not demonstrating sufficient grade level growth.

- Exited students in monitoring status will be identified in Infinite Campus.
- i-Ready benchmark data will be analyzed three times per year for these students. i-Ready data will be triangulated with the students IRLA level as well as teacher made assessments and observations.
- Grade level teachers, Literacy Specialist, English Learner (EL) Specialists, and Principal will monitor exited students. 4
- EL students who are not performing at grade level standards will participate in an Intervention Plan that is prescribed weekly and monitored every other week. These intervention plans will be written by the grade level teachers and implemented by the teachers and subject-specific strategists and shared with parents.
- Grade level teachers will notify the family via printed letter and/or email.

6.1.4 Additional School Level Data

Our school collects and analyzes a variety of data. At our school, the following data will be analyzed to assist with determining the needs of students in our EL Program:

- i-Ready data will be analyzed three times per year.
- Imagine Learning data will be analyzed three times per year.
- ENIL & IRLA - data will be analyzed at minimum biweekly and as necessary during small group instruction.

Our school will analyze data regarding our EL program using the following methods and procedures:

- i-i77’1
    - During grade level Professional Learning Community (PLC) meetings, grade level teachers will review assessment data results and discuss students’ learning paths and necessary interventions.
    - The i-Ready Growth Report will be reviewed to determine students who have not met typical growth targets and/or are not performing on grade level.
    - Once students have been identified, teachers will create a customized learning path for the student and provide small group intervention as needed.

- Imagine Learning
    - During grade level Professional Learning Community (PLC) meetings, grade level teachers will review assessment data results and discuss students’ learning paths and necessary interventions.
    - The Language and Literacy Reports will be reviewed to determine students who are not meeting their growth targets and/or are not performing on grade level.
    - Once students have been identified, teachers will create a customized learning path for the student and provide small group intervention as needed.

- ENIL & IRLA
    - Ongoing monitoring of student progress during daily small group instruction.

6.2 Leadership and Staffing

To eliminate achievement gaps and ensure equitable access to students, leadership and staffing are responsible for the implementation of an effective program.

At our school, each of the following positions perform duties essential to the EL Program. The name of the position and description of the duties relevant to the EL program are stated below:

- ELL Coordinator:
    - Prepares and Administers WIDA Assessments Online Screener and Access 2.0 to all LEP students; Serves as WIDA testing coordinator on the actual dates of online reading testing for WIDA ;

- Maintains and continually updates ELL Records and important documentation online in both student information systems and in educational portfolios
- Notifies all LEP parents of ELL required testing throughout the year (ACCESS, ELPAS, Oral Language Assessments, etc.);
- Assists the district and campus testing coordinator with testing WIDA, MAP, State Testing SBAC, ACT, EOC
- Ensures anyone administering Online Screener and WIDA Access 2.0 have current WIDA Certifications
- Maintains updated English Language Individual Learning Plans and Accommodations, ensures appropriate staff has knowledge of LEP students' plans and accommodations
- Provide continual staff support for Professional Development and information with instructional strategies, best practices for academic language development

- Read by Grade 3 Literacy Specialist:
  - Support school personnel with the implementation of high-quality, standards-based instruction aligned to the ELA NVACS and the NEPF.
  - Plan, prepare, and facilitate literacy professional learning and follow-up processes to support school-based personnel with the implementation of the ELA NVACS, NEPF, and the District's K–12 Literacy Plan.
  - Work collaboratively with teachers to model effective data-driven, decision-making processes focusing on professional learning communities.
  - Provide coaching and mentoring support for teachers by conducting demonstration lessons, observing classroom instruction, and conferencing with teachers to implement research-based strategies addressing the needs of all learners, including students who have been identified as at-risk in literacy, students with special needs, and English language learners (ELL).
  - Work collaboratively with school-based administrators and classroom teachers to effectively implement evidence-based practices for literacy instruction and tiered interventions to support all students.
  - Assist school-site personnel in developing a set of culturally responsive practices that are infused within the school climate and instructional expectations.
  - Work collaboratively with school-based administrators and classroom teachers to effectively implement the required RBG3 assessments, such as the Measures of Academic Progress (MAP) Growth assessments.
  - Assist school-based personnel with the analysis of data aligned with a balanced assessment system.
  - Develop a progress monitoring plan for every student identified as at-risk in literacy; and support systematic progress monitoring for every student identified as at-risk in literacy.
  - Ensure parents and/or legal guardians are notified within 30 days of the determination that a student in kindergarten through Grade 3 is identified as at-risk in literacy.
  - Ensure parents and/or legal guardians approve the intensive instructional plan for all students in kindergarten through Grade 3 who are identified as at-risk in literacy.
  - Provide instruction and support to parents and/or legal guardians of students who have been identified as at-risk in literacy.

- Bilingual Teacher:
  - At each grade level, at least two of the three classroom teachers are bilingual and biliterate in English and Spanish.
  - Students receive instruction in English for half the day and in Spanish for the other half.
  - Teachers receive training in Guided Language Acquisition Design (GLAD) to enhance language acquisition.

6.3 Curriculum

Schools within SPCSA have the autonomy to select their own curriculum. Schools should select a research-based selection of curricula that considers the language development needs of ELs for both Tier I instruction and for supplementary materials.

At our school, we have selected the following curriculum for our EL students:

- American Reading Company (ARC) for ELA ,Tier I
- Ready and i-Ready Math curriculum, Tier I
- Imagine Espanol, Supplemental
- Bridge to Reading, Supplemental Phonics and Phonemic Awareness for Tier I
- BrainPop, Supplemental

Schools should select Evidence Based Interventions (EBI). Evidence-based interventions (EBI) are practices or programs that have evidence to show that they are effective at producing results and improving outcomes when implemented. The kind of evidence described in ESSA has generally been produced through formal studies and research. Under ESSA, there are four tiers, or levels, of evidence:

- Tier/Level 1 – Strong Evidence: supported by one or more well-designed and well-implemented randomized control experimental studies.
- Tier/Level 2 – Moderate Evidence: supported by one or more well-designed and well-implemented quasi-experimental studies.
- Tier/Level 3 – Promising Evidence: supported by one or more well-designed and well-implemented correlational studies (with statistical controls for selection bias).
- Tier/Level 4 – Demonstrates a Rationale: practices that have a well-defined logic model or theory of action, are supported by research, and have some effort underway by an SEA, LEA, or outside research organization to determine their effectiveness.

Our school has implemented the following Evidence Based Interventions in our EL program:

- i-Ready
    - ESSA EBI Level: 2
    - Citation: https://www.curriculumassociates.com/research-and-efficacy/i-ready-evidence-impact
- Imagine Learning
    - ESSA EBI Level: 2
    - Citation: https://www.imaginelearning.com/essa-effectiveness/
- Brainpop
    - ESSA EBI Level: 2
    - Citation: https://www.brainpop.com/classroom-solutions/resources/funding

6.4 Professional Development

Goal 2 from the Nevada Statewide Plan for the Improvement of Pupils (STIP) is that “All students have effective educators.” To meet Goal 2, NDE has identified the following strategies:

- Equity: Ensure effective educators in low-performing schools.
- Access to Quality: Provide quality professional learning.
- Success: Decrease licensed educational personnel vacancies.
- Inclusivity: Serve students in the Least Restrictive Environment.
- Community: Increase candidates in the educator pipeline.
- Transparency: Engage in effective communication.

Nevada's nine Standards for Professional Development are to be incorporated in the development, implementation, and evaluation of professional development trainings for educators employed by a school district or charter school. They should drive discussions and improvements focused on increasing educator effectiveness.

- **Learning Communities:** Professional learning that increases educator effectiveness and results for all students occurs within learning communities committed to continuous improvement, collective responsibility, and goal alignment.
- **Leadership:** Professional learning that increases educator effectiveness and results for all students requires skillful leaders who develop capacity, advocate, and create support systems for professional learning.
- **Resources:** Professional learning that increases educator effectiveness and results for all students requires prioritizing, monitoring, and coordinating resources for educator learning.
- **Data:** Professional learning that increases educator effectiveness and results for all students uses a variety of sources and types of student, educator, and system data to plan, assess, and evaluate professional learning.
- **Learning Designs:** Professional learning that increases educator effectiveness and results for all students integrates theories, research, and models of human learning to achieve its intended outcomes.
- **Implementation:** Professional learning that increases educator effectiveness and results for all students applies research on change and sustains support for implementation of professional learning for long-term change.
- **Outcomes:** Professional learning that increases educator effectiveness and results for all students aligns its outcomes with educator performance and student curriculum standards.
- **Equity:** Professional learning that increases educator effectiveness and results for all students focuses on equitable access, opportunities and outcomes with an emphasis on achievement and opportunity disparities between student groups.
- **Cultural Competency:** Professional learning that increases educator effectiveness and results for all students facilitates educator's self-examination of their awareness, knowledge, skills, and actions that pertain to culture and how they can develop culturally responsive strategies to enrich educational experiences for all students.

Our school will address a variety of topics through professional development this year. These topics include:

- American Reading Company - Training session to assist teachers with high levels of deep implementation of the core reading program. - Outcomes
- i-Ready - Training session to assist teachers with high levels of deep implementation of the core math program. - Outcomes
- TransformED Global Solutions - Training sessions for responsive classrooms and improving equity for all learners. - Equity
- GLAD - Training for teachers to modify the delivery of student instruction to promote the acquisition of academic language and literacy. - Cultural Competency
- CGI – Training for teachers to deepen their understanding of how students develop mathematical thinking through Cognitively Guided Instruction (CGI). Teachers will learn how to use students' reasoning to guide instruction, promote conceptual understanding, and create opportunities for all learners to engage in meaningful problem solving. - Outcomes
- Special Education - Understanding and supporting the needs of students with IEPs - Equity
- Science of Reading - Professional learning focused on understanding how individuals learn to read, the processes involved in reading development, and the most effective instructional practices for teaching reading, including all of the elements of reading. - Implementation

6.5 Other Educational Programs for ELs

According to the EL DCL Fact Sheet from the US Department of Education (USED), English learner (EL) students constitute nine percent of all public school students and are enrolled in nearly three out of every four public schools. Under Title VI

of the Civil Rights Act of 1964 (Title VI) and the Equal Educational Opportunities Act of 1974 (EEOA), public schools must ensure that EL students can participate meaningfully and equally in educational programs.

EL students must be provided meaningful access to all curricular and extracurricular programs. Per the fact sheet:

- EL students must have access to their grade-level curricula so that they can meet promotion and graduation requirements.
- EL students are entitled to an equal opportunity to participate in all programs, including pre-kindergarten, magnet, gifted and talented, career and technical education, arts, and athletics programs; Advanced Placement (AP) and International Baccalaureate (IB) courses; clubs; and honor societies.

At SSAES, we ensure that our research based educational curriculum and programs are effectively implemented by highly qualified teachers and support staff. Our staff is constantly receiving professional development in order to continue to meet the needs of the students. The school has adopted a high-quality, culturally responsive, core curriculum in both ELA and Math to ensure students have access to grade level material.

To ensure that all students have an equal opportunity to participate in programs such as those listed above, the school has created a master schedule to ensure accountability for allocated minutes per subject are met by all teachers. The administrator and coaches conduct classroom visits to ensure all students are engaged in all subjects and grade level materials are used.

7 English Learners with Disabilities

According to the EL DCL Fact Sheet from USED there are also provisions for evaluating EL students for special education and providing dual services.

- EL students with disabilities must be provided both the language assistance and disability-related services to which they are entitled under Federal law.
- EL students who may have a disability, like all other students who may have a disability and may require services under the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act of 1973, must be located, identified, and evaluated for special education and disability-related services in a timely manner.
- To avoid inappropriately identifying EL students as students with disabilities because of their limited English proficiency, EL students must be evaluated in an appropriate language based on the student's needs and language skills.
- To ensure that an individualized plan for providing special education or disability related services addresses the language-related needs of an EL student with a disability, it is important that the team designing the plan include participants knowledgeable about that student's language needs.

All schools are responsible for providing adequate supports to EL students with disabilities regarding language instruction and also provide any disability related accommodation.

USED has developed an English Learner Toolkit. Specifically, Chapter 6: Tools and Resources for Addressing English Learners with Disabilities provides a variety of resources for EL students with disabilities. From Chapter 6, the following set of tools is intended to help schools, LEAs, and SEAs in appropriately identifying and serving ELs with disabilities. The tools give examples of how schools can refer, assess, and identify ELs who may have a disability; how to write an IEP and select accommodations for ELs with disabilities; and how to compare data about EL students with disabilities from LEA to LEA.

- Tool #1, Referral, Identification, Assessment, and Service Delivery to ELs with Disabilities, includes recommendations about ELs with disabilities from states with large or rapidly growing EL student populations.
- Tool #2, Considering the Influence of Language Differences and Disability on Learning Behaviors, offers a matrix of learning behaviors organized by skill area (e.g., listening, speaking, reading, etc.) and the varying roles that language difference or disability can play in those behaviors.
- Tool #3, Developing an IEP for an English Learner with a Disability, is a list of questions to consider for ELs during the IEP-writing process.
- Tool #4, How to Use Data from the Office for Civil Rights' Civil Rights Data Collection (CRDC), provides instructions about how to access EL data at the LEA level, including data about ELs with disabilities.
- Tool #5, Selecting Appropriate Accommodations for Students with Disabilities, offers a list of "dos" and "don'ts" related to choosing accommodations for students with disabilities.

EL Students with Disabilities Plan

- SSAES will identify, locate, and evaluate ELs with disabilities within 30-45 days of starting school.
- SSAES will consider the English language proficiency of ELs with disabilities in determining appropriate assessments and other evaluation materials.
- SSAES will provide and administer special education evaluations in the child's native language, unless it is clearly not feasible to do so, to ensure that a student's language needs can be distinguished from a student's disability-related needs.
- SSAES will not identify or determine that EL students are students with disabilities because of their limited English language proficiency.
- SSAES will provide EL students with disabilities with both the language assistance and disability-related services they are entitled to under federal law.

8 Parent Communication and Participation

8.1 Ensuring Meaningful Communication with Limited English Proficient Parents

Per USED as documented on the EL DCL Fact Sheet:

- LEP parents are entitled to meaningful communication in a language they can understand, such as through translated materials or a language interpreter, and to adequate notice of information about any program, service, or activity that is called to the attention of non-LEP parents.

Strong Start Academy ES will provide effective language assistance to limited English proficient parents, by offering translated materials or a language interpreter. Language assistance will be free and provided by appropriate and competent staff, or through appropriate and competent outside resources. These interpreters and translators have knowledge in both languages and are specifically trained to communicate any specialized and/or technical terms or concepts used within an individualized educational program. Interpreters and translators are trained in the ethics of interpreting and translating and the need to maintain confidentiality.

8.2 Parent Notifications

All required notifications are listed below. Document templates for each item are provided within "Appendix B: Forms and Documents" at the end of this manual.

- EL Bill of Rights Documents
- Home Language Survey
    - Note: The home language survey is provided during student registration and all families must complete this item.
- Initial Notification of Placement
- Annual Notification of Continued Placement
- Exit Letter
- Opt Out Form (for parents who choose to opt out of services)
- Reinstatement Form (for parents who have previously chosen to opt out of services but now would like them reinstated)

8.3 Parent Participation

Strong Start Academy ES will provide effective language assistance to limited English proficient parents, by disseminating all school information in both English and Spanish. At each grade level, at least two out of three classroom teachers are bilingual in English and Spanish and can seamlessly conduct parent teacher conferences in both English and Spanish. Translated materials or a language interpreter can be provided for other languages upon request. Students with Individualized Educational Plans (IEPs) will be provided interpreters and/or translators who have knowledge in the parents' native language and are specifically trained to communicate with parents regarding special education.

At SSAES, families are embraced as important stakeholders who have a voice in their child's future. As such, parents/guardians are encouraged to participate in activities, events, and celebrations throughout the school year to take an active role in their child's education. The school hosts monthly family engagement meetings and all staff in attendance are bilingual and biliterate in English and Spanish. Sessions are offered in both languages.

9 References

The 2020 – 2021 El Plan and Policy from the Carson City School District which was provided by NDE, and Desktop Monitoring documents that from NDE which listed the desktop monitoring requirements were used as reference materials for determining the minimum compliance requirements that have been identified in this manual.

Additional reference materials have all been linked in within the text of this manual, and will be listed in "Appendix A: Links" of this manual.

10 Appendix A: Links

A variety of links have been provided throughout this manual and are listed below:

- SPCSA Strategic Plan
    - https://charterschools.nv.gov/uploadedFiles/CharterSchoolsnvgov/content/Families/Strategic%20Plan%202019_FINAL_ADA(1).pdf
- Nevada Revised Statute (NRS) 388.407
    - https://www.leg.state.nv.us/nrs/nrs-388.html#NRS388Sec407
- Equal Educational Opportunities Act of 1974, 20 U.S.C.§ 1703(f)
    - https://www.law.cornell.edu/uscode/text/20/1703
- Title VI of the 1964 Civil Rights Act 20 U.S.C § 2000d et seq
    - https://www.law.cornell.edu/uscode/text/42/2000d
- 34 C.F. R. part 100

- https://www2.ed.gov/policy/rights/reg/ocr/edlite-34cfr100.html#S1
- NRS Chapter 385
  - https://www.leg.state.nv.us/nrs/nrs-385.html
- NRS Chapter 388
  - https://www.leg.state.nv.us/nrs/nrs-388.html
- Every Student Succeeds Act (ESSA) of 2015, Public Law 114-95
  - https://www.govinfo.gov/content/pkg/PLAW-114publ95/pdf/PLAW-114publ95.pdf
- Nevada Assembly Bill (AB) 195 from the 2021 legislative session
  - https://www.leg.state.nv.us/App/NELIS/REL/81st2021/Bill/7586/Text
- Language Instruction Educational Program (LIEP) Models in Nevada
  - https://doe.nv.gov/uploadedFiles/ndedoenvgov/content/English_Language_Learners(ELL)/Models_of_Instruction_NV.pdf
- EL Bill of Rights Documents
  - https://spcsa.instructure.com/courses/42/files/525?module_item_id=537
- Nevada WIDA site
  - https://wida.wisc.edu/memberships/consortium/nv
- Nevada English Language Learner Identification and Placement
  - https://wida.wisc.edu/sites/default/files/id-placement/NV-ID-Placement-Guidance.pdf
- Template HLS
  - https://spcsa.instructure.com/courses/42/files/1077?module_item_id=969
- EL DCL Fact Sheet
  - https://www2.ed.gov/about/offices/list/ocr/docs/dcl-factsheet-el-students-201501.pdf
- NDE EL Data Workshop Recordings
  - https://spcsa.instructure.com/courses/42/pages/recordings?module_item_id=552
- NDE EL Data Workshop Zip File
  - https://spcsa.instructure.com/courses/42/files/533?module_item_id=553
- WIDA Accessibility and Accommodations Manual
  - https://wida.wisc.edu/resources/accessibility-and-accommodations-manual
- ACCESS Online Accommodations Checklist
  - https://wida.wisc.edu/resources/access-online-accommodations-checklist
- Kindergarten ACCESS Accommodations Checklist
  - https://wida.wisc.edu/resources/kindergarten-access-accommodations-checklist
- Alternate ACCESS Accommodations Checklist
  - https://wida.wisc.edu/resources/alternate-access-accommodations-checklist
- Alternate ACCESS for ELLs Participation Criteria Decision Tree
  - https://wida.wisc.edu/sites/default/files/resource/Alt-Access-Participation-Criteria-Diagram.pdf
- ACCESS for ELLs Checklist
  - https://wida.wisc.edu/sites/default/files/checklists/NV-online-checklist.pdf
- Nevada Statewide Plan for the Improvement of Pupils (STIP)
  - https://doe.nv.gov/STIP/Nevada/
- Standards for Professional Development
  - https://doe.nv.gov/uploadedFiles/ndedoenvgov/content/Educator_Licensure/NVStandardsforPD.pdf
- English Learner Toolkit
  - https://ncela.ed.gov/files/english_learner_toolkit/OELA_2017_ELsToolkit_508C.pdf
- Chapter 6: Tools and Resources for Addressing English Learners with Disabilities
  - https://www2.ed.gov/about/offices/list/oela/english-learner-toolkit/chap6.pdf

11 Appendix B: Forms and Documents

- EL Bill of Rights Documents
  - https://spcsa.instructure.com/courses/42/modules/items/537
- Home Language Survey (HLS)
  - https://spcsa.instructure.com/courses/42/modules/items/969
- Initial Notification of Placement
  - https://spcsa.instructure.com/courses/42/modules/items/990
- Annual Notification of Continued Placement
  - https://spcsa.instructure.com/courses/42/modules/items/988
- Exit Letter
  - https://spcsa.instructure.com/courses/42/modules/items/989
- Opt Out Form (for parents who choose to opt out of services)
  - https://spcsa.instructure.com/courses/42/modules/items/991
- Reinstatement Form (for parents who have previously chosen to opt out of services but now would like them reinstated)
  - https://spcsa.instructure.com/courses/42/modules/items/992

Coversheet

Discussion for possible action to approve the 26-27 Annual Written Test Security Notice.

Section: III. Executive Update
Item: E. Discussion for possible action to approve the 26-27 Annual Written Test Security Notice.
Purpose: Vote
Submitted by:
Related Material: 26-27 Annual Written Test Security Notice.pdf

310 S. 9th Street
Las Vegas, NV 89101
702.463.0222
clvstrongstartes.org
Miriam Benitez, Executive Director
Tino Mora, Assistant Principal

September __, 2026

Dear Strong Start Families,

Per NRS 390.275, the governing body of each charter school shall provide a written notice regarding examinations to all teachers and educational personnel employed by the governing body who are involved in the administration of the examinations, all pupils who are required to take the examinations, and all parents and legal guardians of such pupils.

Strong Start Academy students in grades 3-5 will participate in the Nevada Smarter Balanced Assessments (SBAC). This assessment will consist of a computer adaptive multiple choice test and includes a performance task. The purpose of this assessment is to measure individual student achievement on the Nevada Academic Content Standards (NVACS) for English language arts/literacy (ELA), mathematics and Science. This assessment will be administered in the Spring of 2027.

Additionally, all students at Strong Start also participate in the following school level assessments: i-Ready Math and Reading Diagnostic (K-5), LAS Links Español (K-5) Spanish language proficiency assessment), and all students identified as English Language Learners will participate in the WIDA assessment (English language proficiency assessment). Dates for these assessments are included on our 26-27 Testing Calendar, which is posted on the school's website.

To ensure that we assess your son's/daughter's performance accurately, we are asking for your assistance. First, it is essential that your son/daughter attend school on the days the tests are administered. Please be sure students are rested, eat a nutritious breakfast, and arrive at school on time. In addition, students should be in attendance daily in order to be properly prepared for these exams. By encouraging your son/daughter to complete homework tasks and study for tests/quizzes in school, you will be helping to prepare your child to perform well on these exams. Test results do become a part of your son's/daughter's school records.

The following test security procedures are strictly adhered to in accordance with state guidelines for test security. Proctors verify student eligibility and correct logins prior to student participation in all state-mandated tests. Test materials are secured prior to and during the administration window for each test. Each day teachers will sign out testing materials and return materials to the testing coordinator to ensure materials are secured. Every staff member assisting with testing must participate in a mandatory test proctoring meeting where security measures and proctoring expectations are reviewed.

Students are expected to adhere to Strong Start's code of honor as referenced in the Parent and Student Handbook. Academic dishonesty committed on state-mandated tests results in the invalidation of the test and referral to restorative justice. Staff proctors must follow all testing guidelines and mandates and are subject to corrective action if testing procedures and guidelines are not adhered to.

If you have any questions, please feel free to contact the school office at (702) 463-0222.

Respectfully,

Miriam Benitez

310 S. 9th Street
Las Vegas, NV 89101
702.463.0222
clvstrongstartes.org
Miriam Benitez, Executive Director
Tino Mora, Assistant Principal

__ de septiembre del 2026

Estimadas Familias de Strong Start:

Según NRS 390.275, el consejo de administración de cada escuela chárter deberá proporcionar un aviso por escrito sobre los exámenes a todos los maestros y personal educativo empleado por el consejo de administración que participe en la administración de los exámenes, a todos los alumnos que deban rendir los exámenes, y a todos los padres y tutores legales de dichos alumnos.

Los estudiantes de Strong Start Academy en el grados 3-5 participarán en las evaluaciones Smarter Balanced de Nevada (SBAC). Esta evaluación consistirá en una examen adaptativo por computadora de preguntas con respuestas múltiples, así como contestar preguntas de rendimiento. El propósito de esta evaluación es medir el rendimiento estudiantil individual en los Estándares de Contenido Académico de Nevada (NVACS) para lectura (ELA), matemáticas y ciencias. Esta evaluación se realizará en la primavera del 2027.

Además, todos los estudiantes de Strong Start también participan en las siguientes evaluaciones a nivel escolar: examen i-Ready (K-5), LAS Links Español (evaluación del dominio del idioma español K-5) y todos los estudiantes identificados como estudiantes del idioma inglés participarán en la evaluación WIDA (evaluación del dominio del idioma inglés). Las fechas de estas evaluaciones están incluidas en nuestro Calendario de pruebas 26-27, que está publicado en el sitio web de la escuela.

Para asegurarnos de evaluar con precisión el desempeño de su hijo(a), le pedimos su ayuda. Primero, es fundamental que su hijo(a) asista a la escuela los días en que se administren los exámenes. Asegúrese de que los estudiantes duerman lo suficiente, coman un desayuno nutritivo y lleguen a la escuela a tiempo. Además, los estudiantes deben asistir diariamente para estar preparados para estos exámenes. Cuando usted motiva a su hijo(a) a completar las tareas escolares y a estudiar para los exámenes/cuestionarios, usted está ayudando a que se preparen y se desempeñen bien en estos exámenes. Los resultados de los exámenes son parte de los registros escolares de su hijo(a).

Los siguientes procedimientos de seguridad se cumplen estrictamente de acuerdo con las reglas estatales para la seguridad de los exámenes. Los supervisores verifican la elegibilidad de los estudiantes y que las sesiones sean las correctas antes de que los estudiantes participen en todas los exámenes exigidos por el estado. Los materiales de examen se guardan antes y durante el periodo de administración de cada examen.Cada día, los maestros firmarán los materiales de examen y los devolverán al coordinador de exámenes para garantizar que los materiales estén seguros. Cada miembro del personal que ayude con los exámenes debe participar en una reunión obligatoria de supervisión de exámenes donde se revisan las medidas de seguridad y las expectativas de supervisión.

Se espera que los estudiantes se adhieran al código de honor de Strong Start como se menciona en el Manual de Padres y Estudiantes. La deshonestidad académica cometida en las pruebas exigidas por el estado resulta en la invalidación de la prueba y la remisión a la justicia restaurativa. Los supervisores del personal deben seguir todas las directrices y mandatos de las pruebas y están sujetos a medidas correctivas si no se cumplen los procedimientos y directrices de las pruebas.

Si tiene alguna pregunta, no dude en comunicarse con la oficina de la escuela (702) 463-0222.

Respetuosamente,

Miriam Benitez

Coversheet

Discussion for possible action to approve the Read By Grade 3 Local Literacy Plan (LLP).

Section: III. Executive Update
Item: F. Discussion for possible action to approve the Read By Grade 3 Local Literacy Plan (LLP).
Purpose: Vote
Submitted by:
Related Material: StrongStartAcademy-LLP2026-2028.pdf

READ BY GRADE 3 LOCAL LITERACY PLAN FOR 2026-2027/2027-2028 SCHOOL YEARS

LOCAL PROGRAM CONTACT SECTION

School District or Charter Organization	Strong Start Academy	Date:	4/14/2026
Number of Sites Being Served:	1	Local Education Agency (LEA) Grade Spans:	K-5
Read by Grade 3 Program Lead Information			
Name:	Miriam Benitez	Title:	Executive Director
Phone Number:	(702) 463-0222	Email Address:	mbenitez@clvstrongstartes.org

List the names and titles of the members of your Local Literacy Plan Team:	
Name:	**Title:**
Florentino Mora	Assistant Principal
Osvaldo Garcia	Instructional Coach
Terry House	Kinder Teacher
Alisha Balasquide	1st Grade
Elizabeth Smith	2nd Grade
Myriam Reyes	3rd Grade
Leonela Salazar	4th Grade
Tamika McSwain	5th Grade
Alexis Aramburo	Parent

CHARTER ORGANIZATIONS ONLY: Who is your sponsor (SPCSA, District, etc.)?	SPCSA

I. Identification, Intervention, and Intensive Instruction

Statutory Requirement *NRS 388.157.1 (a*:) The Local Literacy Plan must include a program to provide intervention and intensive instruction for pupils identified as deficient in reading.

Student Identification

How does the LEA identify elementary students who are deficient in reading?

Strong Start Academy Elementary School identifies students who are deficient in reading through the use of the i-Ready diagnostic assessment system. All students in grades K–5 are administered the i-Ready Reading Diagnostic three times per year (beginning, middle, and end of year) to measure reading proficiency and growth. The i-Ready assessment provides detailed data on each student's performance in key domains, including phonological awareness, phonics, vocabulary, and comprehension. Students are identified as deficient in reading based on their placement below grade-level benchmarks, particularly those performing two or more grade levels below or scoring below the 41st percentile, as indicated by state guidance and internal data analysis.

In addition to the universal screening windows, we also use the Independent Reading Level Assessment (IRLA), which is a formative assessment that helps our teachers regularly monitor student progress on grade level proficiency. This ongoing progress monitoring allows staff to identify students who may require additional support throughout the year, even if they were not initially identified.

The data is reviewed collaboratively by teachers, instructional leaders, and support staff to ensure accurate identification of students in need of intervention and to inform targeted instructional planning.

Intervention Program Design & Delivery

How does the LEA provide targeted, evidence-based reading interventions aligned to student needs?
Frequency and duration of small-group or intensive instruction:

Strong Start Academy Elementary School provides targeted, evidence-based reading interventions through a structured literacy approach using the American Reading Company (ARC) framework, including IRLA (Independent Reading Level Assessment) ARC Core instruction, Seeing Stars and Visualizing and Verbalizing reading intervention programs.

During the daily literacy block, teachers use IRLA data to differentiate instruction and provide targeted small-group support aligned to each student's specific reading needs (e.g., phonics, fluency, comprehension, and vocabulary). Students performing below grade level receive more frequent, targeted instruction in small groups at least three times per week. These groups are fluid and adjusted regularly based on ongoing formative data and student progress.

Teachers also utilize ARC Toolkits to deliver explicit, skill-based interventions tailored to individual student gaps. Instruction is aligned to each student's IRLA level, ensuring that support is both rigorous and appropriately scaffolded.

In addition to core instruction, after-school tutoring begins in October following the completion of beginning-of-year i-Ready and IRLA assessments. Students identified as needing additional support participate in small-group tutoring sessions, typically consisting of no more than five students per group. These sessions are held three times per week (Tuesday through Thursday) for one hour. Instruction during tutoring is highly targeted and data-driven, with groups formed based on specific skill deficits identified through assessment data.

This multi-tiered approach ensures that students receive consistent, focused intervention opportunities both during and beyond the instructional day, with frequency and duration adjusted based on individual student need.

Describe how reading interventions are provided for the following: Phonological/Phonemic Awareness, Decoding and Word Reading, Reading Fluency, Vocabulary Development, Reading Comprehension.

Strong Start Academy Elementary School provides targeted, evidence-based reading interventions across all essential components of literacy through a structured approach that integrates ARC Core, IRLA, ARC Toolkits, and Bridge to Reading/Heggerty resources.

Phonological/Phonemic Awareness:
Students receive explicit, systematic instruction in phonological and phonemic awareness through the use of Bridge to Reading and Heggerty routines. These daily, structured lessons focus on skills such as rhyming, segmenting, blending, and manipulating sounds. For students identified as below grade level, additional small-group intervention is provided using targeted Bridge to Reading or Bridge the Gap lessons to reinforce foundational auditory skills.

Decoding and Word Reading:
Decoding instruction is delivered through Bridge to Reading or Bridge the Gap phonics lessons, which provide systematic and explicit instruction in sound-symbol relationships. Teachers use IRLA data to identify specific gaps and provide differentiated small-group instruction using ARC-aligned resources and Toolkits. Students receive repeated practice with

targeted phonics patterns to build automaticity and accuracy in word reading.

Reading Fluency:
Fluency is developed through daily guided reading, repeated reading, and ARC routines embedded within the literacy block. Teachers monitor fluency through IRLA benchmarks, Heggerty fluency assessments, and iReady fluency passages. Targeted support is provided using ARC Toolkits, Heggerty resources, and iReady passages. Students below grade level engage in additional repeated reading practice during small-group instruction and intervention time to improve rate, accuracy, and expression.

Vocabulary Development:
Vocabulary instruction is integrated within ARC Core units and reinforced through read-alouds, discussions, and purposeful exposure to academic language. Teachers explicitly teach and revisit key vocabulary using ARC resources and Toolkits. Small-group instruction targets vocabulary development aligned to students' reading levels and instructional needs, ensuring access to grade-level content.

Within our dual language model, teachers intentionally plan for bridging activities between English and Spanish, allowing them to make cross-linguistic connections and deepen their understanding of academic vocabulary in both languages. GLAD strategies are also embedded throughout instruction to support language development, including the use of visuals, chants, and structured oral language practice. Beginning in 3rd grade, IRLA Toolkits place an increased emphasis on vocabulary development, including morphology and word analysis, to strengthen comprehension and support students in applying strategies across increasingly complex texts. Additional vocabulary development occurs through targeted tutoring, where students engage in structured practice with vocabulary in context through passages, reinforcing meaning, usage, and word relationships. Furthermore, the online i-Ready personalized pathway provides individualized instruction in vocabulary and language development, ensuring continued practice and reinforcement aligned to each student's needs.

Reading Comprehension:
Comprehension instruction is embedded throughout ARC Core instruction, where students engage in close reading, text-based discussions, and written responses. Teachers use IRLA data to identify comprehension gaps and provide targeted small-group instruction using ARC strategies and Toolkits. Instruction focuses on key skills such as identifying main idea, making inferences, and citing evidence, with scaffolds adjusted based on student need.

The online i-Ready personalized pathway further differentiates instruction by developing comprehension skills across both informational texts and literature, ensuring students receive targeted practice aligned to their individual levels. During tutoring, students participate in small groups where they engage with targeted passages, respond to text-dependent questions, and complete short written responses. This structured practice strengthens overall comprehension while simultaneously building background knowledge, vocabulary, and writing skills.

II. Assessment Procedures

Statutory Requirement *NRS 388.157.1(b)*: Procedures for assessing reading proficiency using valid, reliable, State Board–approved assessments.

Assessment training and administration procedures.

Strong Start Academy Elementary School ensures that all staff administering the i-Ready Reading Diagnostic receive training and follow standardized procedures to maintain fidelity and reliability of assessment data.

Assessment Training:
All teachers and relevant instructional staff participate in beginning-of-year training on the administration of the i-Ready Reading Diagnostic. Training includes guidance on assessment purpose, administration protocols, student test-taking expectations, and how to ensure a secure and distraction-free testing environment. Ongoing support is provided by instructional leadership to address questions and reinforce best practices. New staff members receive additional onboarding and coaching as needed.

Administration Procedures:
The i-Ready Reading Diagnostic is administered three times per year (beginning, middle, and end of year) within designated assessment windows. To ensure consistency and validity of results, the following procedures are implemented:

- **Teachers conference with students to set goals and expectations before and after testing cycles.**
- **Students complete the diagnostic independently, without teacher assistance on test items.**
- **Teachers provide clear directions and model expectations prior to testing.**
- **Testing is conducted in a quiet, controlled environment to minimize distractions.**
- **The assessment is administered in appropriate time blocks to prevent fatigue, with flexibility to pause and resume as**

needed.

- Universal supports (e.g., headphones) are provided to all students, and allowable accommodations are provided in alignment with IEPs and 504 plans.
- Identified students are pulled for small group testing.
- Teachers actively monitor students during testing to ensure engagement and adherence to expectations, without influencing responses.

Following each administration window, staff engage in data review protocols to analyze results, identify students in need of support, and inform instructional planning and intervention.

Grade Level	State Approved Assessment Tool(s)
Kindergarten	iReady Reading Diagnostic
First Grade	iReady Reading Diagnostic
Second Grade	iReady Reading Diagnostic
Third Grade	iReady Reading Diagnostic
Fourth Grade	iReady Reading Diagnostic
Fifth Grade	iReady Reading Diagnostic

III. English Learner (EL) Literacy Program

Statutory Requirement *NRS 388.157.1(c)*: A specific program to improve the reading proficiency of pupils who are English learners.

What is the LEA's plan to improve reading proficiency among students who are English learners?

Strong Start Academy Elementary School implements a comprehensive plan to improve reading proficiency among English Learners through a dual language instructional model and targeted, data-driven supports.

As a dual language school, students receive literacy instruction in both Spanish and English. This model is grounded in research demonstrating that bilingual instruction is one of the most effective approaches for developing strong literacy skills in emerging bilingual students. By building foundational literacy in students' primary language while simultaneously developing English proficiency, students are able to transfer skills across languages, accelerating overall reading achievement. Intentional bridging between Spanish and English instruction is a key component of this model, allowing students to explicitly make connections across languages, deepen metalinguistic awareness, and strengthen comprehension and vocabulary development.

Core literacy instruction is delivered through ARC/IRLA in both languages, with intentional alignment to ensure students are developing skills in phonics, fluency, vocabulary, and comprehension. Instruction is strategically scaffolded to support language development through the integration of GLAD strategies, including the use of visuals, graphic organizers, chants, and structured academic discourse. These strategies promote language acquisition while increasing access to grade-level content and supporting meaningful student engagement.

Student progress is closely monitored using multiple data sources, including the i-Ready Reading Diagnostic, WIDA ACCESS scores, and SBAC results. This data is used to identify areas of need and provide targeted interventions through small-group instruction, ARC Toolkits, designated English Language Development (ELD) supports through ARC's Guide to IRLA Coaching with Multilingual Learners, and differentiated instruction within the i-Ready personalized pathway.

Based on current performance data, English Learners at Strong Start Academy are demonstrating positive outcomes and growth in reading proficiency. Ongoing data analysis ensures that instructional practices are continuously refined to meet student needs and sustain high levels of achievement.

IV. Literacy Specialists & Teacher Collaboration

Statutory Requirement *(NRS 388.157.1(d)*: Procedures to facilitate collaboration between licensed literacy specialists and classroom teachers.

What procedures does the LEA use to ensure collaboration between licensed literacy specialists and classroom teachers?

Strong Start Academy Elementary School ensures ongoing collaboration between our licensed literacy specialist and classroom teachers through structured systems and consistent communication focused on improving student reading outcomes.

Our literacy specialist and teachers engage in regular meetings to review i-Ready and IRLA data, identify students in need of intervention, and plan targeted instructional supports. These collaborative meetings provide opportunities to analyze student progress, adjust grouping, and align interventions to specific skill deficits.

In addition, our literacy specialist provides coaching and modeling to classroom teachers, supporting the implementation of evidence-based instructional practices, including ARC/IRLA routines, use of Toolkits, and foundational skills instruction through Bridge to Reading or Bridge the Gap. This includes co-planning lessons, modeling small-group instruction, and providing feedback to ensure fidelity of implementation.

Ongoing communication is maintained through professional learning communities (PLCs), where teachers and specialists work together to align instructional strategies, share best practices, and monitor the effectiveness of interventions. Informal check-ins and classroom observations further support alignment and continuous improvement.

When students are unable to attend after-school tutoring or require a more intensive or differentiated level of support, the literacy specialist collaborates closely with the classroom teacher to design and implement additional targeted interventions. This includes analyzing persistent areas of need, adjusting instructional approaches, and providing supplemental in-class or alternative supports to ensure that students who are not demonstrating adequate progress receive timely and responsive instruction.

This collaborative structure ensures that literacy instruction and interventions are cohesive, data-driven, and consistently implemented across classrooms to meet the needs of all students.

Coversheet

Discussion for possible action to renew the Memorandum of Understanding with S.A.F.E. House to provide services for the prevention of interpersonal violence/domestic violence.

Section: III. Executive Update
Item: G. Discussion for possible action to renew the Memorandum of Understanding with S.A.F.E. House to provide services for the prevention of interpersonal violence/domestic violence.
Purpose: Vote
Submitted by:
Related Material: AB 245 (2026) Power-Based Violence MOU - (155431010.1).pdf

MEMORANDUM OF UNDERSTANDING

S.A.F.E. HOUSE

AND

STRONG START ACADEMY

This Memorandum of Understanding ("MOU") stands as evidence that S.A.F.E. House, Inc. ("S.A.F.E. House") and CLV Strong Start Academy Elementary Schools Inc. ("Strong Start Academy") intend to collaborate toward the mutual goal of providing maximum available assistance for students of Strong Start Academy and their families who experience interpersonal violence/domestic violence. Both agencies believe that implementation of a prevention program ("Program") at Strong Start Academy, as described herein, will further this goal. S.A.F.E. House and Strong Start Academy Elementary School agree to collaborate in improving the physical, psychological, emotional and social safety of all students. To this end, each agency agrees to consider participation in the Program by coordinating/providing the following services:

Specifically:

Strong Start Academy agrees to the following:

1. Provide S.A.F.E. House with the classroom space necessary to facilitate the presentations and/or trainings described herein.
2. Provide assistance from the school's staff in getting informational flyers to parents before presentations and/or trainings are scheduled to occur.
3. Provide a designated member of the school's staff to remain in the physical or virtual classroom while S.A.F.E. House facilitates the trainings and/or presentations.
4. Provide presentation feedback following each presentation.
5. Refer students, families, and employees who self-disclose that they are victims/survivors of power-based violence to S.A.F.E. House.
6. Place a link to the S.A.F.E. House website on the school's website as a resource to the school community.
7. Provide S.A.F.E. House with all applicable policies and procedures.

S.A.F.E. House, Inc. agrees to the following:

1. Offer/Provide trainings and/or presentations regarding prevention and education on power-based violence to school counselors/Teachers and parents of students.
2. Offer/Provide school counselors/teachers with English and Spanish informational flyers to be distributed to parents prior to presentations/trainings, and as needed.
3. Offer/Provide violence prevention education on topics relevant to student, family, and employee safety, such as bystander intervention.

155431010.1

4. Comply with all Strong Start Academy policies and procedures.
5. Comply with all applicable laws, regulations and ordinances.

Both agencies agree to be responsive to one another in their communications.

In no event will Strong Start Academy be liable for any loss profits, loss of use, loss of contracts or for any indirect or consequential loss or damage. Strong Start Academy will not be liable for any liability arising in connection with the Program.

Strong Start Academy shall not provide or make available to S.A.F.E. House any person's personally identifiable information from education records. In the event any Program participant not employed by Strong Start Academy voluntarily provides personally identifiable information to S.A.F.E. House in conjunction with the Program, S.A.F.E. House shall treat such information as confidential.

This MOU will be effective for 1 year from the date of signature. Both agencies may terminate this MOU at any time for any reason upon written notice. Strong Start Academy reserves the right to terminate individual Program service providers at any time for any reason at its sole discretion.

We, the undersigned, as authorized representatives of S.A.F.E. House and Strong Start Academy do hereby approve this document.

Beth Flory Executive Director S.A.F.E. House, Inc.	Lorna James-Cervantes Board President Strong Start Academy Elementary School
Date	Date

155431010.1

Coversheet

Discussion for possible action to review and approve proposed revisions, as necessary, to the Board Policy and Procedure Manual, Code of Ethics, and Bylaws.

Section: IV. Governance
Item: A. Discussion for possible action to review and approve proposed revisions, as necessary, to the Board Policy and Procedure Manual, Code of Ethics, and Bylaws.
Purpose: Vote
Submitted by:
Related Material:
2026 Board Resolutions - Amended and Restated Bylaws (Fully Compiled)_4909-2560-5065_1.pdf

RESOLUTION OF THE BOARD OF DIRECTORS (THE "BOARD") OF CLV STRONG START ACADEMY ELEMENTARY SCHOOLS, INC., A NEVADA NONPROFIT CORPORATION (THE "SCHOOL"), FOR THE PURPOSE OF AMENDING ITS BYLAWS

WHEREAS, on March 1, 2022, the Board adopted the Bylaws of the School, which were amended on April 5, 2022 (collectively, the "Bylaws"); and

WHEREAS, the Board has determined that it is advisable and in best interests of the School to amend the Bylaws in substantially the form set forth on **Exhibit A** attached hereto (the "Amended and Restated Bylaws").

NOW, THEREFORE, BE IT:

RESOLVED, that the Amended and Restated Bylaws of the School are hereby approved in all respects.

FURTHER RESOLVED, that the officers of the School be, and each of them hereby is, authorized and directed for and on behalf of the School to take such other actions and execute such other documents as the officers may deem necessary or appropriate in order to carry out and perform the purposes of the foregoing resolutions, and all actions authorized by these resolutions and taken by the officers prior to the date of these resolutions are hereby ratified and approved in all respects.

[Remainder of Page Intentionally Left Blank]

PASSED, ADOPTED AND APPROVED ON _____, _____.

CLV STRONG START ACADEMY ELEMENTARY SCHOOLS, INC.

By: _____
Name:
Title:

ATTESTED:

By: _____
Name:
Title:
Date:

APPROVED AS TO FORM:

By: _____
Name:
Title:
Date:

Exhibit A

Amended and Restated Bylaws

(See attached.)

AMENDED AND RESTATED BYLAWS

of

CLV STRONG START ACADEMY ELEMENTARY SCHOOLS, INC.

I.

Name and Offices

1. Office.

The name of this Nevada non-profit corporation (the "Corporation") operating a state public charter school is CLV STRONG START ACADEMY ELEMENTARY SCHOOLS, INC.

2. Office.

The principal office of the Corporation shall be located at 310 S. 9th Street, Las Vegas, Nevada 89101, or at such other location within Clark County, Nevada as designated by the Board of Directors from time to time in accordance with the Corporation's charter contract with its chartering government authorizer/sponsor. The Board of Directors may change the location of the principal office from time to time, provided that written notice of any change is provided to the chartering government authorizer/sponsor within thirty (30) days.

3. Other Offices.

The Corporation may also have offices at such other places both within and without the State of Nevada as the Board of Directors may from time to time determine or the business of the Corporation may require.

II.

Purposes of Corporation

1. Purposes.

The purpose of the Corporation is to engage in any lawful act or activity for which corporations may be organized under Chapter 82 of the Nevada Revised Statutes and shall have all powers afforded by Chapter 82 of the Nevada Revised Statutes, as limited by Chapter 388A of the Nevada Revised Statutes. Within the framework and limitations of the foregoing, the specific objectives and purposes of the Corporation shall be to engage in educational purposes consistent with (1) Sections 115, 170(c) and 50l(c)(3) of the Internal Revenue Code (or the corresponding section(s) of any future federal tax code); and (2) any future Charter Contract the Corporation enters into with its chartering government authorizer/sponsor. Without affecting or limiting the foregoing, the Corporation is to develop, manage, operate, guide, direct and promote one or more

Nevada public charter schools.

2. Statutory Powers.

For the foregoing purposes, the Corporation shall have all powers afforded by Chapter 388A of the Nevada Revised Statutes and Chapter 82 of the Nevada Revised Statutes, including, without limitation, the power to solicit gifts, grants, and contributions from all persons whomsoever for use in furtherance of the above stated purposes; to acquire and receive funds and property of every kind and nature whatsoever, whether by purchase, conveyance, lease, gift, grant, bequest, legacy, devise, or otherwise, outright or in trust; to hold, own, expend, give, grant, contribute, convey, transfer, and dispose of any funds and property and the income therefrom in furtherance of the above stated purposes, and to lease, mortgage, encumber and use the same; to borrow money and incur indebtedness, and in connection therewith, to draw, make, accept, endorse, execute, and issue notes, drafts, bills of exchange, bonds, debentures, or any other negotiable or nonnegotiable instruments or evidences of payment thereof and any interest thereon by mortgage, pledge, deed of trust, assignment, or otherwise on, of, or with respect to all or any part of the Corporation; to contract with private parties and federal, state and local governments and their agencies and instrumentalities; and such other powers that are consistent with the foregoing purposes and that are afforded by Chapter 82 and Chapter 388A of the Nevada Revised Statutes.

3. Prohibited Purposes and Powers.

(a) Notwithstanding the foregoing statement of purposes and powers, the Corporation shall have and exercise only such powers and engage in only such activities as are contemplated and permitted to be carried on by a corporation exempt from federal income taxes under Section 115 of the Internal Revenue Code or 501(a) of the Internal Revenue Code as an organization described in Section 501(c)(3) thereunder and by a corporation described in and contributions to which are deductible for federal income tax purposes under Section 170(c) of the Internal Revenue Code. The Corporation shall engage in activities within the contemplation of Section 82.131 of the Nevada Revised Statutes; provided, however, that this reference shall not be taken as permitting any power or the exercise of any power not within the contemplation of Sections 115, 170(c) and 50l(c)(3) of the Internal Revenue Code.

(b) The Corporation shall not operate for profit. This Corporation's assets are irrevocably dedicated to not-for-profit purposes as set forth in these Bylaws. The Corporation shall not, incidentally or otherwise, afford or pay any pecuniary gain, dividends, or other pecuniary remuneration to any Director or officer of the Corporation or any other private person, and no part of the net income or net earnings of the Corporation shall, directly or indirectly, be distributable to otherwise inure to the benefit of any private person, provided, however, that the Corporation may pay reasonable compensation for services rendered to or for the benefit of the Corporation and to make such other payments and distributions in furtherance of its purposes. The Corporation shall not carry on propaganda or otherwise attempt to influence legislation to such extent as would result in the loss of exemption under Section 501(a) of the Internal Revenue Code as an organization described in Section 501(c)(3) of the Internal Revenue Code. The Corporation shall not participate in or intervene in (including, without limitation, the publishing or distributing of

statements) any political campaign on behalf of or in opposition to any candidate for public office. The Corporation shall not loan its credit in aid of any company, corporation or association.

(c) The Corporation shall not discriminate on the basis of race, religion, national origin, ethnicity, gender identity or expression, age, disability, sex, sexual orientation, military/veteran status, or any other class protected under applicable laws, including without limitation (i) in its employment practices; and (ii) in its student enrollment, education, treatment, disciplinary, and other practices. In accordance with the Immigration Reform and Control Act of 1986, the Corporation will not employ unauthorized aliens.

III.

Board of Directors

1. General Powers.

(a) Subject to the provisions and limitations of the Nonprofit Corporation Law, the Charter School Law, and any other applicable laws, and subject to any limitations or obligations set forth in applicable law, the Charter Contract, the Articles, or these Bylaws, the Corporation's activities and affairs shall be supervised, directed, and overseen, and all corporate powers shall be exercised, by or under the direction of the Board of Directors ("Board"). The Board shall be the governing board of the school under the authorization of its chartering government authorizer/sponsor, as well as the governing board of the Corporation. Generally, the Board shall delegate the day-to-day management of the activities of the school to the school administration, so long as the affairs of the school are ultimately managed, and its powers are exercised, solely and exclusively under the Board's jurisdiction.

(b) Notwithstanding whomever may have the authority to recommend, appoint, elect, or remove a Director to or from the Board, each Director shall perform all duties of the Board, including duties on any Board Committee, in good faith, in a manner the Director believes to be in the best interest of the school operated by the Corporation (as applicable), with such care as a reasonable person in a like position would use under similar circumstances, and in compliance with any code of conduct adopted by the Board from time to time consistent with the Nevada Ethical Code (as defined herein below). Each Director shall discharge his or her duties in compliance with NRS 388A.320, NRS Chapter 281A (the Nevada Ethical Code), the Open Meeting Law (NRS Chapter 241), and any applicable regulations adopted by the chartering government authorizer/sponsor. The foregoing is not intended to create any stronger or additional fiduciary duties than already exists by virtue of the Nonprofit Corporation Law, Charter School Law, and other applicable laws and authorities.

(c) In performing the duties of a Director, each Director shall be entitled to rely on information, opinions, reports, or statements, including financial statements and other financial data, presented, or prepared by: (1) one or more officers or employees of the school whom the Director believes to be reliable and competent in the matters presented; (2) legal counsel, independent accountants, and other persons as to matters that the Director believes are within that person's professional or expert competence; and (3) a Board Committee on which the Director does not serve, as to matters within its authority; but in each case, only when the Director has no

knowledge of facts that would cause such reliance to be unwarranted.

2. Specific Powers. Without prejudice to the general powers set forth in Section 1 of this Article, but subject to the same limitations, the Board of Directors shall have all power:

(a) To (1) supervise the conduct, management and control of the affairs and activities of the Corporation; (2) make policies, rules, and regulations not inconsistent with, but instead to uphold and enforce, applicable law, the Charter Contract, the Articles, and these Bylaws; (3) establish and approve all major educational activities, operational policies, and the schedule of major events and activities at the school, so as to cause the growth and development of the students' academic performance and emotional well-being; (4) to ensure the ongoing evaluation of the school, in part to ensure public accountability; and (5) to strive for a diverse student population, reflective of the local and regional community.

(b) To appoint and remove, at the pleasure of the Board, corporate officers, committee members and agents; prescribe powers and duties for them as are consistent with the law, the Articles, and these Bylaws; fix their compensation; and require from them security for faithful service.

(c) To change the principal office or the principal business office in Nevada from one location to another; and designate a place for holding any meetings.

(d) To supervise and approve the leasing, purchase, acquisition, improvement, sublease, mortgage, transfer in trust, pledge, encumbering of, conveyance of, or disposition of, in any lawful manner (including by exchange, lease, gift, devise, bequest, or otherwise), for and in the name of the Corporation, any and all (A) real property, (B) major personal property, and (C) rights or privileges deemed necessary or convenient for the conduct of the school's purpose and mission;

(e) To (1) develop and approve an annual budget, (2) periodically monitor the school's income and expenses to adjust its financial plans accordingly, (3) ensure adequate funding for school operations, including fundraising and the pursuit of local, state, and federal grants (consistent with the school's mission), and (4) to submit a final budget to the Corporation's chartering government authorizer/sponsor pursuant to applicable law;

(f) To cause an annual inspection or audit of the accounts of the school, as well as any other audits required by applicable law, made by an independent, licensed accountant selected by the Board, which audit shows in reasonable detail all of the assets, liabilities, revenues, and expenses of the school and its accurate financial condition;

(g) To borrow money and incur indebtedness on the Corporation's behalf and cause to be executed and delivered for the Corporation's purposes, in the corporate name, promissory notes, bonds, debentures, deeds of trust, mortgages, pledges, hypothecations, and other evidences of debt and securities; and

(h) To from time to time engage and terminate any EMO or CMO, vendor, or other service provider, in the Board's sole and absolute discretion.

3. Number, Term, and Election.

(a) The Board of Directors shall consist of seven (7) members until changed by amendment to these Bylaws. Within the limitations, if any, expressed in the Articles of Incorporation, the number of Directors of the Corporation may be increased or decreased from time to time, by the affirmative vote of the Las Vegas City Council; provided, however, that in no event shall the number of Directors be fewer than five (5), as required by NRS 388A.320(1). Notwithstanding anything to the contrary contained in these Bylaws, this entire Section 3 and Section 15 (Vacancies) and Section 16 (Compensation) of Article III of these Bylaws, as well as Section 8 (Compensation) of Article V of these Bylaws, may be amended or repealed only by the affirmative vote of the Las Vegas City Council. Unless otherwise provided in the Articles of Incorporation or these Bylaws, Directors shall hold office until his or her successor shall be elected and qualified.

(b) In conformance with the Charter School Law, the Directors of the Corporation shall be recommended for appointment as described below and subject to election by the Las Vegas City Council, or a duly appointed committee thereof. Recommendations to appoint qualified candidates to fill specific Director seat vacancies shall be provided by the following individuals at least thirty (30) days (unless a shorter period is necessary due to a death, resignation, or removal of any Director or other unforeseen event) before the date of any election of Directors as follows:

(i) Director seat #1, who shall be a teacher or other person licensed pursuant to Chapter 391 of NRS or who previously held such a license and is retired, as long as his or her license was held in good standing, shall be recommended for appointment by the City of Las Vegas Director of Youth Development & Social Innovation (or equivalent successor position);

(ii) Director seat #2, who shall satisfy the qualifications of Director #1 above, or shall be a school administrator with a license issued by another state or who previously held such a license and is retired, as long as his or her license was held in good standing, shall be recommended for appointment by the Chief Community Services Officer of the City of Las Vegas (or equivalent successor position);

(iii) Director seat #3, who shall be a parent or legal guardian of a pupil enrolled in the charter school who is not a teacher or an administrator at the charter school, shall be recommended for appointment by the City of Las Vegas Councilperson for Ward 5;

(iv) Director seat #4, who shall possess knowledge and experience in one or more of the following areas: (1) Accounting; (2) Financial services; (3) Law; or (4) Human resources, shall be recommended for appointment by the City of Las Vegas Councilperson for Ward 3;

(v) Director seat #5, who shall possess knowledge and experience in one or more of the following areas: (1) Accounting; (2) Financial services; (3) Law; or (4) Human resources, shall be recommended for appointment by the City Manager of the City of Las Vegas;

(vi) Director seat #6 shall be recommended for appointment by the City of Las Vegas Councilperson for Ward 1; and

(vii) Director seat #7 shall be recommended for appointment by the Mayor of the

City of Las Vegas.

(c) Notwithstanding anything to the contrary contained in these Bylaws, the Board's membership shall adhere to the statutory requirements of NRS 388A.320, NAC 388A.525, and other applicable laws and regulations, at all times.

(d) A Director may take office only after complying with the provisions of applicable law, including NRS 388A.320(3) and 388A.323. If so required by the Charter School Law, the Corporation shall notify its chartering government authorizer/sponsor and the Nevada Department of Education within ten (10) working days of the selection of a new Director and provide the new Director's resume and affidavit pursuant to NRS 388A.320(2). Directors shall also be fingerprinted according to the NRS 388A.323 procedure.

(e) Each Director shall hold office for two (2) years from his/her election, and until a successor Director has been elected and qualified. No Director shall serve more than three (3) consecutive full terms (six consecutive years), unless the Las Vegas City Council determines that a waiver of this limitation is necessary to maintain board continuity and institutional knowledge. The Las Vegas City Council may decide, in its reasonable discretion, to stagger the terms so approximately half of the Directors are up for election each year. The Mayor of the City of Las Vegas shall decide which slate of initial Directors shall only serve a one (1)-year term to achieve such staggering.

4. Place of Meetings.

(a) The Board may hold its meetings at such place or places as it may choose from time to time by resolution or as shall be designated in any notices or waivers of notice thereof. Any such meeting, whether regular or special, may be held by conference telephone or similar communications equipment by means of which all persons participating in the meeting can hear each other, and participation in a meeting in such manner shall constitute presence in person at such meeting.

(b) All meetings of the Board and its committees shall be called, noticed, and held in compliance with the Nonprofit Corporation Law, and at all times while the Corporation is subject to the provisions of the Charter School Law, with NRS Chapter 241 (the "Open Meeting Law").

5. Annual Meetings.

Regular meetings of the Board shall be held annually for the purpose of organization and the transaction of other business at the place where regular meetings of the Board are held, at a time, date, and place as noticed by the Board in compliance with the Nonprofit Corporation Law, and at all times while the Corporation is subject to the provisions of the Charter School Law, with the Open Meeting Law. If such meeting is not held as provided above, the meeting may be held at such time and place as shall be specified in a notice given as hereinafter provided for a special meeting of the Board.

6. Other Regular Meetings.

Other regular meetings of the Board may be held at such times and places as the Board shall from time to time by resolution determine. Notice of all such regular meetings shall be in the manner provided for in Section 7 (Special Meetings; Notice) below and shall comply with NRS

241.020. Regular meetings shall be held no less often than once per quarter, as required by NRS 388A.320(1). Quarters are defined as July 1 – September 30, October 1 – December 31, January 1 – March 31, and April 1 – June 30.

7. Special Meetings; Notice.

Special meetings of the Board shall be held whenever called by the President or a majority of the Directors in office. Notice shall be given, in the manner hereinafter provided, of each such special meeting, which notice shall state the time and place of such meeting, but need not state the purposes thereof. At least three (3) working days' written notice of such meeting shall be given to each Director and to the public, in compliance with NRS 241.020(2). Such notice shall contain the date, time, place, and agenda of the meeting and a specific description of the business to be transacted thereat. Notice shall be posted at the principal office of the Corporation, on the Corporation's website (if any), and at the Nevada Legislature's notice website, and shall otherwise comply with the Open Meeting Law. No business shall be transacted at any special meeting except that specifically described in the notice of such meeting. Special meetings shall be validly held only by compliance with this Section, and no waiver of notice or consent to the holding of such meeting or the minutes thereof shall be effective for any purpose whatsoever. If a Director is unable to attend a Board meeting, the Board member shall contact the President or designated supervising employee prior to the meeting.

8. Closed Sessions.

Any Director may request a Closed Session or non-Meeting session in advance of any special or regular meeting of the Board, for issues concerning personnel or other matters requiring confidentiality and which are permitted to be closed or held outside a public meeting under the Open Meeting Law. All persons except Directors of the Board may be excluded from such Closed or Non-Meeting Sessions, at the President's or Board's discretion, to the extent consistent with applicable law. Following such meetings, an officer may provide a general description of the matters discussed to be provided as the minutes of said Closed or Non-Meeting Session, if appropriate. The Board may deliberate, but may not take formal action, in a Closed Session or non-Meeting session. Every Director has a duty to maintain the confidentiality of all Board meetings and actions, which are not required by law to be open to the public, including discussions which take place during any Closed or Non-Meeting Sessions of the Board. Any Director violating this confidence may be removed from the Board.

9. Public Comment.

At all times while the Corporation is subject to the Charter School Law, time shall be set aside at each meeting of the Board for public comment as provided by the Open Meeting Law, NRS 241.020(2)(d)(3). A period devoted to comments by the general public shall be included as an agenda item at the beginning and at the end of each meeting, or at such other points as required by the Open Meeting Law. The speaker shall be asked to identify his or her name, address, and affiliations (if any). Public comment may be time limited and shall be stated as such on the Agenda for such public meeting.

10. Quorum and Manner of Acting.

(a) A majority of the whole Board shall be present in person at any meeting of the Board in order to constitute a quorum for the transaction of business at such meeting, and except as otherwise specified in these Bylaws and except also as otherwise expressly provided by the Nonprofit Corporation Law and by the Open Meeting Law, the vote of a majority of the Directors present at any such meeting at which a quorum is present shall be the act of the Board. In the absence of a quorum from any such meeting, a majority of the Directors present thereat may adjourn such meeting. Notice of such adjournment to another time or place shall be given, prior to the time schedule for the continuation of the meeting, to the Directors who were not present at the time of the adjournment, and during any period the Corporation is subject to the Charter School Law, to the public in the manner prescribed by the Open Meeting Law (which may require re-noticing the meeting with a three-day advance notice requirement). The Directors shall act only as a Board and the individual Directors shall have no power as such. Directors may not vote by proxy.

(b) To the extent permitted by applicable laws and regulations (including the Open Meeting Law, during any period the Corporation is subject to the Charter School Law), Directors may participate in meetings by means of a conference telephone or video conference or similar communications method, as long as (i) all persons participating in the meeting can hear each other, (ii) the chairman of such meeting, exercising his/her reasonable discretion, can authenticate the identity of those Members, and (iii) a physical location is designated for the meeting where members of the public may attend and participate as required by NRS 241.023; and participation in such a fashion shall constitute presence in person at such meeting.

11. Organization.

At each meeting of the Board, the President, or if he or she is absent therefrom, a Director ch9sen by a majority of the Directors present thereat, shall act as chairman of such meeting. The Secretary, or if he or she is absent, the person (who shall be an Assistant Secretary, if any and if present) whom the chairman of such meeting shall appoint, shall act as Secretary of such meeting· and keep the minutes thereof.

12. Events Causing Vacancies On Board.

A vacancy or vacancies on the Board shall occur in the event of (a) the death, resignation, or removal of any Director; (b) the declaration by resolution of the Board of a vacancy in the office of a Director who has been convicted of a felony or an offense involving moral turpitude, declared of unsound mind by a court order, or found by final order or judgment of any court to have breached a duty under the Nonprofit Corporation Law, Charter School Law, or Nevada Code of Ethical Standards at NRS 281A.400 et seq. (the "Nevada Ethical Code"); or (c) the increase of the authorized number of Directors.

13. Resignations.

Any Director may resign at any time by giving written notice of his or her resignation to the Corporation. Any such resignation shall take effect at the time specified therein, or if the time when it shall become effective is not specified therein, it shall take effect immediately upon its

receipt by the President or the Secretary, or the Board; and unless otherwise specified therein, the acceptance of such resignation shall not be necessary to make it effective.

14. Removal of Directors.

Directors may be removed, with or without cause and from time to time, by the affirmative vote of the Las Vegas City Council, as provided by Chapter 82 of the Nevada Revised Statutes and NRS 388A.320 then in effect. A Director shall be automatically removed upon (a) conviction of a felony, (b) a finding by the Nevada Commission on Ethics of a violation of NRS Chapter 281A, (c) three (3) consecutive unexcused absences from regular meetings of the Board, or (d) failure to maintain any qualification required under Section 3 of this Article III or applicable law. The Corporation shall notify its chartering government authorizer/sponsor within ten (10) working days of any removal of a Director.

15. Vacancies.

Vacancies and newly created directorships resulting from any increase in the authorized number of Directors shall be filled by the affirmative vote of the Las Vegas City Council within ninety (90) days of the occurrence of the vacancy. If one or more Directors shall resign from the Board, effective at a future date, the Las Vegas City Council by affirmative vote, shall have the power to fill such vacancy or vacancies, the vote thereon to take effect when such resignation or resignations shall become effective, and each Director so chosen shall hold office as provided in this Section in the filling of such vacancies. The Corporation shall notify its chartering government authorizer/sponsor within ten (10) working days of any vacancy on the Board and of the subsequent appointment to fill such vacancy, in accordance with NRS 388A.320(2).

16. Compensation.

Unless otherwise expressly provided by NRS 388A.320(5) or by affirmative vote of the Las Vegas City Council, no Director shall receive any compensation for his or her services as a Director or officer or committee member. The Board may at any time and from time to time by resolution provide that Directors shall be paid their actual and necessary expenses, if any, of attendance at each meeting of the Board or incurred when conducting the Corporation's business.

17. Non-Liability of Directors.

Notwithstanding any other provisions in these Bylaws, no Director shall be subject to liability if:

(a) he or she would not have been liable, for the same action or omission, if the Corporation was a for-profit corporation, under NRS 78.138 (setting forth, among other things, Nevada's business judgment rule, constituencies provision, reasonable-reliance provision, and the threshold for liability limitation set forth in NRS 78.138(7)); and/or

(b) he or she is immune from liability under traditional common-law precedents or statutory provisions, including, for example, NRS 41.0305 et seq. (codifying the doctrine of sovereign immunity).

18. Compliance with Laws Governing Student Records.

During any period the Corporation is subject to the Charter School Law, the Corporation and the Board of Directors shall comply with all applicable provisions of the Family Education Rights Privacy Act ("FERPA") as set forth in Title 20 of the United States Code Section 1232g and attendant regulations as they may be amended from time to time.

19. Conflict Of Interest.

The Board shall follow the Code of Ethical Standards set forth at NRS Chapter 281A and the conflict of interest policy adopted by the Board, as amended from time to time. Neither the Board nor any Director shall engage in any transactions barred under the Board's conflict of interest policy in effect from time to time. The following transaction shall not be deemed a prohibited self-dealing transaction, and is subject to the Board's general standard of care: a transaction which is part of a public or charitable program of the school, if the transaction is approved or authorized by the independent Directors in good faith and without unjustified favoritism, and results in a benefit to one or more Directors or their families because they are part of a class of persons intended to be benefited by the program.

IV.

Officers

1. Number.

The Corporation shall have the following officers: a President, a Secretary, and a Treasurer. At the discretion of the Board, the Corporation may also have one or more Vice Presidents, one or more Assistant Vice Presidents, one or more Assistant Secretaries, and one or more Assistant Treasurers. Any two or more offices may be held by the same person.

2. Election and Term of Office.

The officers of the Corporation shall be elected annually (or as vacancies arise) by the Board. Each such officer shall hold office until his or her successor is duly elected or until his or her earlier death or resignation or removal in the manner hereinafter provided.

3. Agents.

In addition to the officers mentioned in Section 1 of this Article IV, the Board may appoint such agents as the Board may deem necessary or advisable, each of which agents shall have such authority and perform such duties as are provided in these Bylaws or as the Board may from time to time determine. The Board may delegate to any officer or to any committee the power to appoint or remove any such agents.

4. Removal.

Any officer may be removed, with or without cause, at any time by resolution adopted by a majority of the whole Board.

5. Resignations.

Any officer may resign at any time by giving written notice of his or her resignation to the Board, the President, or the Secretary. Any such resignation shall take effect at the times specified therein, or if the time when it shall become effective is not specified therein, it shall take effect immediately upon its receipt by the Board, the President, or the Secretary; and unless otherwise specified herein, the acceptance of such resignation shall not be necessary to make it effective.

6. Vacancies.

A vacancy in any office due to death, resignation, removal, disqualification, or any other cause may be filled for the unexpired portion of the term thereof by the Board.

7. President.

The President shall be the chief executive officer of the Corporation and shall have, subject to the control of the Board, general and active supervision and direction over the business and affairs of the Corporation and over its several officers. The President shall: (a) preside at all meetings of the Board; (b) see that all orders and resolutions of the Board are carried into effect; (c) have the authority to sign, execute, and deliver in the name of the Corporation all deeds, mortgages, bonds, contracts, or other instruments authorized by the Board, except in cases in which the signing, execution, or delivery thereof is expressly delegated by the Board or by these Bylaws to some other officer or agent of the Corporation or when any of them are required by law otherwise to be signed, executed, or delivered; and (d) have the authority to cause the corporate seal, if any, to be affixed to any instrument that requires it. In general, the President shall perform all duties incident to the office of the President and such other duties as from time to time may be assigned to him or her by the Board.

8. Vice President.

A Vice President and any additional Vice Presidents shall have such powers and perform such duties as the President or the Board may from time to time prescribe and shall perform such other duties as may be prescribed by these Bylaws. At the request of the President or in case of his or her absence or inability to act, the Vice President shall perform the duties of the President and when so acting, shall have all the powers of, and be subject to all the restrictions upon, the President.

9. Secretary.

The Secretary shall: (a) record all the proceedings of the Board and the Executive

Committee, if any, in one or more books kept for that purpose; (b) see that all notices are duly given in accordance with the provisions of these Bylaws or as required by law; (c) be the custodian of all contracts, deeds, documents, all other indicia of title to properties owned by the Corporation, other corporate records (except accounting records), and of the corporate seal, if any, and affix such seal to all documents the execution of which on behalf of the Corporation under its seal is duly authorized; (d) see that the books, reports, statements, certificates, and all other documents and records required by law are properly kept and filed. In general, the Secretary shall perform all duties incident to the office of Secretary and such other duties as from time to time may be assigned to him or her by the President or the Board.

10. Treasurer.

If required by the Board, the Treasurer shall give a bond for the faithful discharge of his or her duties in such sum and with such surety or sureties as the Board shall determine. The Treasurer shall: (a) have charge and custody of and be responsible for all funds, securities, notes, and valuable effects of the Corporation; (b) receive and give receipt for moneys due and payable to the Corporation from any sources whatsoever; (c) deposit all such moneys to the credit of the Corporation or otherwise as the Board or the President shall direct in such banks, trust companies, or other depositories as shall be selected in accordance with the provisions of Article VI of these Bylaws; (d) cause such funds to be disbursed by checks or drafts on the authorized depositories of the Corporation signed as provided in Article VI of these Bylaws; (e) be responsible for the accuracy of the amounts of and cause to be preserved proper vouchers for all moneys so disbursed; (f) have the right to require from time to time reports or statements giving such information as he or she may desire with respect to any and all financial transactions of the Corporation from the officers or agents transacting the same; (g) render to the President or the Board whenever they, respectively, shall request him or her so to do an account of the financial condition of the Corporation and of all his or her transactions as Treasurer; and (h) upon request, exhibit or cause to be exhibited at all reasonable times the cash books and other records to the President, any of the Directors of the Corporation, and unless otherwise prohibited by applicable law the City Manager of the City of Las Vegas or any councilperson of the City Council of the City of Las Vegas. This right to exhibit may be circumscribed in instances where the right to inspect conflicts with Nevada or federal law (e.g., restrictions on the release of educational records under FERPA) pertaining to access to books, records, and documents. In general, the Treasurer shall perform all duties incident to the office of Treasurer and such other duties as from time to time may be assigned to him or her by the President or the Board.

11. Assistant Officers.

Any persons elected as assistant officers shall assist in the performance of the duties of the designated office and such other duties as shall be assigned to them by any Vice President, the Secretary, or the Treasurer, as the case may be, or by the Board or the President.

12. Executive Director.

The Executive Director of the school is not an officer or member of the Board of Directors of the Corporation. He/she shall be the general manager of the school and shall supervise, direct,

and control the school's day-to-day activities, affairs, and administration as fully described in any applicable employment contract, agreement, or job specification. The Executive Director shall have such other powers and duties as the Board of Directors or the Bylaws may require from time to time.

V.

Committees

1. Executive Committee; How Constituted and Powers.

The Board, by resolution adopted by a majority of the whole Board, may designate one or more of the Directors then in office to constitute an Executive Committee, which shall have and may exercise between meetings of the Board all the delegable powers of the Board to the extent not expressly prohibited by the Nonprofit Corporation Law and Charter School Law, or by resolution of the Board. The Board may designate one or more Directors as alternate members of the Executive Committee who may replace any absent or disqualified member at any meeting of the Executive Committee. Each member of the Executive Committee shall continue to be a member thereof only during the pleasure of a majority of the whole Board.

2. Executive Committee; Organization.

The President shall act as chairman at all meetings of the Executive Committee, and the Secretary shall act as secretary thereof. In case of the absence from any meeting of the President or the Secretary, the Executive Committee may appoint a chairman or secretary, as the case may be, of the meeting.

3. Executive Committee; Meetings.

Regular meetings of the Executive Committee may be held on such days and at such places as shall be fixed by resolution adopted by a majority of the Executive Committee and communicated to all its members. Special meetings of the Executive Committee shall be held whenever called by the President or a majority of the members thereof then in office. Notice of each special meeting of the Executive Committee shall be given in the manner provided in Section 7 (Special Meetings; Notice) of Article III of these Bylaws for special meetings of the Board. Subject to the provisions of this Article V, the Executive Committee by resolution adopted by a majority of the whole Executive Committee shall fix its own rules of procedure, and it shall keep a record of its proceedings and report them to the Board at the next regular meeting thereof after such proceedings have been taken. All such proceedings shall be subject to revision or alteration by the Board; provided, however, that third parties shall not be prejudiced by any such revision or alteration.

4. Executive Committee; Quorum and Manner of Acting.

A majority of the Executive Committee shall constitute a quorum for the transaction of business, and except as specified in Section 3 of this Article V, the act of a majority of those present

at a meeting thereof at which a quorum is present shall be the act of the Executive Committee. The members of the Executive Committee shall act only as a committee, and the individual members shall have no power as such.

5. Other Committees.

The Board, by resolution adopted by a majority of the whole Board, may constitute other committees, which shall in each case consist of one or more of the Directors and at the discretion of the Board, such officers who are not Directors. The Board may designate one or more Directors or officers who are not Directors as alternate members of any committee who may replace any absent or disqualified member at any meeting of the committee. Each such committee shall have and may exercise such powers as the Board may determine and specify in the respective resolutions appointing them; provided, however, that unless all of the members of any committee shall be Directors, such committee shall not have authority to exercise any of the powers of the Board in the management of the business and affairs of the Corporation. A majority of all the members of any such committee may fix its rules of procedure, determine its action, fix the time and place of its meetings, and specify what notice thereof, if any, shall be given, unless the Board shall otherwise by resolution provide. Notice of a meeting of a committee may be given at any time and in any manner reasonably designed to inform the committee members of the time and place of the meeting; provided, however, that if a majority of the Board exists on any committee, the notice of a meeting shall comply with the Open Meeting Law.

6. Resignations.

Any member of the Executive Committee or any other committee may resign therefrom at any time by giving written notice of his or her resignation to the President or the Secretary. Any such resignation shall take effect at the time specified therein, or if the time when it shall become effective is not specified therein, it shall take effect immediately upon its receipt by the President or the Secretary; and unless otherwise specified therein, the acceptance of such resignation shall not be necessary to make it effective.

7. Vacancies.

Any vacancy in the Executive Committee or any other committee shall be filled by the vote of a majority of the whole Board.

8. Compensation.

Unless otherwise expressly provided by resolution adopted by the Board, no member of the Executive Committee or any other committee shall receive any compensation for his or her services as a committee member. The Board may at any time and from time to time by resolution provide that committee members who are not Directors shall be paid a reasonable fixed sum for attendance at each committee meeting or a reasonable stated salary as a committee member. In addition, the Board may at any time and from time to time by resolution provide that all committee members shall be paid their actual expenses, if any, of attendance at each committee meeting. Nothing in this Section shall be construed as precluding any committee member who is not a

Director from serving the Corporation in any other capacity and receiving reasonable compensation therefor, but the Board may by resolution provide that any committee member receiving compensation for his or her services to the Corporation in any other capacity shall not receive additional compensation for his or her services as a committee member.

9. Dissolution of Committees; Removal of Committee Members.

The Board, by resolution adopted by a majority of the whole Board, may, with or without cause, dissolve the Executive Committee or any other committee, and, with or without cause, remove any member thereof.

10. Restrictions.

No committee may: (a) Fill vacancies on any committee of the Board; (b) Amend, repeal, or adopt the Charter Contract or any Bylaws; (c) Amend or repeal any resolution of the Board that by its express terms is not so amendable or subject to repeal; or (d) Create any other committees of the Board or appoint the members of committees of the Board. Any decision by a committee may be amended, repealed, superseded, and/or overruled by a decision of the Board of Directors.

VI.

Business of the Corporation

1. Execution of Contracts.

Except as otherwise required by law or by these Bylaws, any contract or other instrument may be executed and delivered in the name of the Corporation and on its behalf by the President or any Vice President. In addition, the Board may authorize any other officer or officers or agent or agents to execute and deliver any contract or other instrument in the name of the Corporation and on its behalf, and such authority may be general or confined to specific instances as the Board may by resolution determine.

2. Attestation.

Any Vice President, the Secretary, or any Assistant Secretary may attest the execution of any instrument or document by the President or any other duly authorized officer or agent of the Corporation and may affix the corporate seal, if any, in witness thereof, but neither such attestation nor the affixing of a corporate seal shall be requisite to the validity of any such document or instrument.

3. Checks, Drafts.

All checks, drafts, orders for the payment of money, bills of lading, warehouse receipts, obligations, bills of exchange, and insurance certificates shall be signed or endorsed (except endorsements for collection for the account of the Corporation or for deposit to its credit, which shall be governed by the provisions of Section 4 of this Article VI) by such officer or officers or

agent or agents of the Corporation and in such manner as shall from time to time be determined by resolution of the Board.

4. Deposits.

All funds of the Corporation not otherwise employed shall be deposited from time to time to the credit of the Corporation or otherwise as the Board or the President shall direct in general or special accounts at such banks, trust companies, savings and loan associations, or other depositories as the Board may select or as may be selected by any officer or officers or agent or agents of the Corporation to whom power in that respect has been delegated by the Board. For the purpose of deposit and for the purpose of collection for the account of the Corporation, checks, drafts, and other orders for the payment of money that are payable to the order of the Corporation may be endorsed, assigned, and delivered by any officer or agent of the Corporation. The Board may make such special rules and regulations with respect to such accounts, not inconsistent with the provisions of these Bylaws, as it may deem expedient.

5. Fiscal Year.

The accounts of the Corporation shall be audited at least once a year by a competent accounting firm, which does not have as a member, shareholder, partner or employee, any member of the Board. A financial statement based upon such audit shall be made available to any Director upon request, and a copy of said audit shall be supplied to any regulatory agency and the City Manager of the City of Las Vegas upon request. The financial statement shall contain without limitation the following information, in appropriate detail: (a) The assets and liabilities, including the trust funds, of the Corporation as of the end of the fiscal year; (b) The principal changes in assets and liabilities, including trust funds; (c) The Corporation's revenue or receipts, both unrestricted and restricted to particular purposes; (d) The Corporation's expenses or disbursement for both general and restricted purposes; and (e) Any information required under these Bylaws.

6. Fiscal Year.

The fiscal year of the Corporation shall commence on July 1st and end on June 30th of each following calendar year.

VII.

Seal

A corporate seal shall not be requisite to the validity of any instrument executed by or on behalf of the Corporation. Nevertheless, if in any instance a corporate seal is used, the same shall be in the form of a circle and shall bear the full name of the Corporation and the year and state of incorporation or words and figures of similar import.

VIII.

Indemnification of Directors and Officers

Provided none of the following will violate any applicable provision of the Code or cause the Corporation to lose its tax-exempt status under the Code:

1. General.

The Corporation shall indemnify any person who was or is a party or is threatened to be made a party to any threatened, pending, or completed action, suit, or proceeding, whether civil, criminal, administrative, or investigative (other than an action by or in the right of the Corporation) by reason of the fact that he or she is or was a director or officer or committee member of the Corporation against expenses (including, without limitation, reasonable attorneys' fees), judgments, fines, and amounts paid in settlement actually and reasonably incurred by him or her in connection with such action, suit, or proceeding if he or she acted in good faith and in a manner he or she reasonably believed to be in or not opposed to the best interests of the Corporation, and with respect to any criminal action or proceeding, had no reasonable cause to believe his or her conduct was unlawful. The termination of any action, suit, or proceeding by judgment, order, settlement, conviction, 9f upon a plea of nolo contendere or its equivalent shall not, of itself, create a presumption that the person did not act in good faith and in a manner that he or she reasonably believed to be in or not opposed to the best interests of the Corporation, and with respect to any criminal action or proceeding, had reasonable cause to believe that his or her conduct was unlawful. The Corporation shall not, however, indemnify said person for: (i) an action brought by the Corporation against him/her; or (ii) if it is proven that his/her action or omission (A) constituted a breach of a fiduciary duty owed (if any) as a Director or officer or committee member, and (B) the breach of such duty involved intentional misconduct, fraud or a knowing violation of law.

2. Procedure.

Any indemnification under Section 1 of this Article VIII (unless ordered by a court) shall be made by the Corporation only as authorized in the specific case upon a determination that indemnification of the Director, officer, or committee member is proper in the circumstances because he or she has met the applicable standard of conduct set forth in such Section 1. Such determination shall be made: (a) by the Board by a majority vote of a quorum consisting of Directors who were not parties to such action, suit, or proceeding; or (b) if such a quorum is not obtainable, or even if obtainable, and a quorum of disinterested Directors so directs, by independent legal counsel in a written opinion. The Corporation's election to indemnify shall not constitute a waiver of its right to subsequently challenge whether indemnification was required. The Corporation shall not settle any action, suit, or proceeding that would impose any penalty or limitation on indemnitee without indemnitee's prior written consent. _Neither the Corporation nor indemnitee will unreasonably withhold its or his or her consent to any proposed settlement.

3. Advances for Expenses.

Expenses incurred by a Director, officer, or committee member of the Corporation in defending a civil or criminal action, suit, or proceeding shall be paid by the Corporation in advance of the final disposition of such action, suit, or proceeding upon receipt of an undertaking by or on behalf of the Director, officer, or committee member to repay such amount if it shall be ultimately

determined that he or she is not entitled to be indemnified by the Corporation as authorized in this Article VIII.

4. Rights Not Exclusive.

The indemnification and advancement of expenses provided by or granted pursuant to this Article VIII shall not be deemed exclusive of any other rights to which those seeking indemnification may be entitled under any law, bylaw, agreement, vote of disinterested Directors, or otherwise, both as to action in his or her official capacity and as to action in another capacity while holding such office.

5. Insurance.

The Corporation shall have power to purchase and maintain insurance on behalf of any person who is or was a Director, officer, or committee member of the Corporation against any liability asserted against him or her and incurred by him or her in any such capacity or arising out of his or her status as such, whether or not the Corporation would have the power to indemnify him or her against such liability under the provisions of this Article VIII.

6. Definition of Corporation.

For the purposes of this Article VIII, references to the "Corporation" include, in addition to the resulting corporation, all constituent corporations (including any constituent of a constituent) absorbed in consolidation or merger that, if its separate existence had continued, would have had power and authority to indemnify its directors, officers, and committee member so that any person who is or was a director, officer, or commitee member of such constituent corporation shall stand in the same position under the provisions of this Article VIII with respect to the resulting or surviving corporation as he or she would have with respect to such constituent corporation if its separate existence had continued.

7. Subrogation.

In the event of any payment hereunder by the Corporation, the Corporation shall be subrogated to the extent of such payment to all of the rights of recovery of indemnitee, who shall execute all documents required and shall do all acts that may be necessary to secure such rights and to enable the Corporation to effectively bring an action to enforce such rights.

8. Continuation of Rights.

The indemnification and advancement of expenses provided by or granted pursuant to this Article VIII shall continue as to a person who has ceased to be a Director, officer, or committee member of the Corporation and shall inure to the benefit of the heirs, executors, and administrators of such person. No amendment to or repeal of this Article VIII shall apply to or have any effect on the rights of any Director, officer, or committee member under this Article VIII that came into existence by virtue of acts or omissions of such Director, officer, or committee member occurring prior to such amendment or repeal.

IX.

Amendments

Save and except as otherwise stated in these Bylaws, the Board of Directors may adopt, amend or repeal any of these Bylaws by a majority vote of the Directors present at a meeting duly held at which a quorum is present, except that no amendment shall change any provisions of the Articles, Charter Contract, or these Bylaws unless the Corporation obtains the written consent of its chartering government authorizer/sponsor, if so required. The Corporation shall provide a copy of any adopted amendment to these Bylaws to its chartering government authorizer/sponsor within thirty (30) days of adoption.

X.

Dissolution

In the event of dissolution of the Corporation, the Board of Directors shall comply with all requirements of NRS 388A.366 and NRS Chapter 82. The Corporation shall provide written notice to its chartering government authorizer/sponsor and the Nevada Department of Education at least thirty (30) days prior to any voluntary dissolution. Upon dissolution, after paying or making provision for the payment of all liabilities of the Corporation and complying with all conditions of any charter contract then in effect, all remaining assets of the Corporation shall be distributed exclusively for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. No part of the Corporation's assets shall be distributed to any Director, officer, or private individual, except for reasonable compensation for services rendered or reimbursement for expenses incurred prior to dissolution. All student records and other records shall be transferred and preserved in accordance with NRS 388A.366 and applicable regulations.

XI.

Construction and Definitions

Unless the context indicates otherwise, the general provisions, rules of construction, and definitions in Nevada Revised Statutes ("NRS") Chapter 82 (the "Nonprofit Corporation Law") and NRS Chapter 388A (the "Charter School Law") shall govern the construction of these Bylaws. Without limiting the generality of the preceding sentence, the masculine gender includes the feminine and neuter, the singular includes the plural, and the plural includes the singular, and the term "person" includes both a legal entity and a natural person. At all times while the Corporation is subject to the provisions of the Charter School Law, it shall comply with the terms and provisions of Nevada's Public Records Act, NRS Chapter 239.

CERTIFICATE OF SECRETARY

I certify that I am the duly elected and acting Secretary of CLV STRONG START ACADEMY ELEMENTARY SCHOOLS, INC., a Nevada nonprofit corporation, and certify that the above Bylaws, consisting of 19 pages, are the Bylaws of this Corporation, effective as of _____, 20__.

By: _____
Name:
Title: Secretary

Approved as to Form:

By: _____
Name:
Title:
Date:

Coversheet

Discussion and possible action to approve revisions to the previously adopted Governing Board meeting calendar for the 2026–2027 school year.

Section: IV. Governance
Item: B. Discussion and possible action to approve revisions to the previously adopted Governing Board meeting calendar for the 2026–2027 school year.
Purpose: Vote
Submitted by:
Related Material: Strong_Start_2026-2027_Revised_Board_Meeting_Calendar.pdf

STRONG START ACADEMY

2026-2027 Board Meeting Calendar

Governance Calendar

REGULAR MEETING SCHEDULE

Meetings are scheduled for the **2nd Wednesday of each month**, beginning at **5:00 p.m.**

SEP	SEPTEMBER	9, 2026	OCT	OCTOBER	14, 2026
NOV	NOVEMBER	18, 2026	DEC	DECEMBER	9, 2026
JAN	JANUARY	13, 2026 **Half Day Board Retreat**	FEB	FEBRUARY	10, 2026
MAR	MARCH	10, 2026	APR	APRIL	14, 2026
MAY	MAY	12, 2026	JUN	JUNE	9, 2026 **No Meeting**