

2024-2025 Organizational Submissions & Audits Process

# OVERVIEW

As a charter school authorizer and in line with best practice, CSI is responsible for implementing an accountability system that evaluates CSI schools’ academic, financial, and operational performance (e.g., “CARS”). As one component of measuring operational performance and to support school compliance with local, state, and federal requirements, CSI has developed the annual Organizational Submissions and Audits Process.

The Organizational Submissions and Audits Process intends to evaluate each school’s compliance with key laws, regulations, policies, and contract provisions, and looks to ensure that minimum requirements are being met while still protecting a school’s autonomy. Below is a listing of submissions and audits for the 2024-25 school year. It is not a comprehensive list of organizational submissions and audits across CSI departments, but rather a list of key organizational compliance monitoring activities related to contract requirements and policies. CSI reserves the right to request additional submissions or conduct additional audits as needed to ensure compliance. CSI has drafted and compiled resources to assist CSI schools in meeting minimum requirements.

# INSTRUCTIONS FOR SUBMITTING

This year, schools will submit all Organizational Submissions via Epicenter. Schools will be trained on how to use and submit via this new platform prior to the first submission deadline. Please note that schools are welcome and encouraged to submit any time before a submission due date. The CSI review team will aim to provide timely feedback on all submissions, including items submitted early.

Questions about the submissions process can be directed to legalandpolicy\_csi@csi.state.co.us.

# SUBMISSIONS SCHEDULE

# SUBMISSIONS AND RATIONALE

| **Due Date** | **Submission** | **Details** |
| --- | --- | --- |
| 8/15/2024 | Articles of Incorporation and Bylaws | **Rationale:** The Articles of Incorporation and Bylaws provide for governance of the operation of the school in a manner consistent with the charter contract and state and federal law. CSI is collecting the Articles of Incorporation for each school and will store the copies submitted in Epicenter for ease of access by CSI and the school.**Instructions:** Upload a copy of the Articles of Incorporation and Bylaws in Epicenter.**Additional Support:** For additional information and resources, see CSI's Board Governance Resource Page: <https://resources.csi.state.co.us/school-board-governance-library/> |
| 8/15/2024 | Assurance of Compliance | **Rationale:** By certifying the Assurance of Compliance, the school board chair and school leader demonstrate awareness of—and confirm compliance with—applicable federal, state, and local laws and regulations, as well as application and contract requirements. The Assurance of Compliance is not fully comprehensive, and compliance is not limited to the laws, rules, and policies set forth therein. Schools are required to adhere to any and all applicable federal, state, and local laws and regulations and all relevant CSI policies regardless of whether they are explicitly listed in the Assurance of Compliance. **Instructions:** The School leader and board chair will approve the document in Epicenter.**Additional Support:** Questions about this submission can be submitted to legalandpolicy\_csi@csi.state.co.us.  |
| 8/15/2024 | Memorandum of Understanding Regarding Special Education Services  | **Rationale:** CSI schools and CSI are required under applicable law—including the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, et seq.; Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794; the Elementary and Secondary Education Act, 20 U.S.C. § 6301, et seq.; the Americans with Disabilities Act, 42 U.S.C. § 12101 et seq.; and the Exceptional Children’s Educational Act, C.R.S. § 22-20-101, et seq.—to provide special education and related services to its students. Because CSI is unique in its position as the Local Educational Agency and Administrative Unit (“LEA”) for the charter schools it authorizes, the SPED MOU outlines how CSI and CSI schools work together to ensure all federal and state requirements related to special education are met. **Instructions:** The School leader and board chair will approve the document in Epicenter.**Additional Support:** Questions about this submission can be directed to nickstachokus@csi.state.co.us.  |
| 8/15/2024 | Proof of Insurance | **Rationale:** CSI schools are required under the charter contract to purchase insurance protecting the school and its board, employees, volunteers, and CSI where appropriate. Through this submission, the school provides evidence of the following minimum coverages:* Comprehensive general liability - $2,000,000
* Officers, directors and employees errors and omissions - $1,000,000
* Property insurance - As required by landlord
* Motor vehicle liability (if appropriate) - $1,000,000
* Bonding or crime (if appropriate)
	+ - Minimum amounts: $25,000
		- Maximum amounts: $100,000
* Workers' compensation - (as required by state law)

**Instructions:** Upload a copy of the 1) Certificate of Liability Insurance, and 2) Evidence of Property Insurance in Epicenter.**Additional Support:** Questions about this submission can be directed to legalandpolicy\_csi@csi.state.co.us.  |
| 8/15/2023 | Food and Transportation Services Surveys | **Rationale:** Basic information about food and transportation services is needed to ensure proper authorizer oversight and alignment with the school’s contract. **Instructions:** Complete the surveys linked in Epicenter.**Additional Support:** Questions about the food and transportation services surveys can be directed to legalandpolicy\_csi@csi.state.co.us.  |
| 8/15/2024 | Employee Handbook  | **Rationale:** CSI collects employee handbooks annually for consultation when/if an employee contacts CSI regarding a grievance matter. CSI staff use the handbook to direct an employee to/through the school’s grievance process. CSI does not audit or review employee handbooks.**Instructions:** Upload a copy of the Employee Handbook in Epicenter. **Additional Support:** Each CSI school has a free membership to [Employers Council](https://my.employerscouncil.org/SSO/login.aspx?vi=9&vt=9964a820c6b8c147c99b4a84b78c7a75eca6aa5a29137f4909c38eee0f9627ff03fb30729a99432850ea7325e8dd567972883c5ede7320c9f7c812143cf5aa05). Among other supports, Employers Council reviews employee handbooks, provides up-to-date guidance and resources on employee policies and has staff available to answer school questions. Please contact allegrawenger@csi.state.co.us if you need information about your Employers Council account. |
| 8/15/2024 | Parent/Student Handbook | **Rationale:** CSI collects Parent/Student Handbooks annually to ensure the school is providing certain required information to families. CSI will review the handbook to ensure the below items are included and that feedback provided on the 2023-24 handbooks has been addressed\*:* **Annual Notification of Rights,** which outlinesschool procedures in line with [FERPA](https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html), and includes the [annual notification of rights to parents](http://www2.ed.gov/policy/gen/guid/fpco/ferpa/lea-officials.html) and the [annual notice for directory information](http://www2.ed.gov/policy/gen/guid/fpco/ferpa/mndirectoryinfo.html).
* **Assessment and Parent Refusal,** which aligns with requirements established in C.R.S. § 22-7-1013 and outlines school determinations and procedures related to assessment mode (paper/computer) and parent opt-out. The handbook might include the entire board-approved Assessment Policy or provide a summary of the policy and hyperlink to it. Schools should review the [CSI Assessment Policy Checklist](http://resources.csi.state.co.us/wp-content/uploads/2020/05/Assessment-policy-guidance.docx) prior to submission.
* **Graduation Requirements (if applicable),** which align with the [Colorado Graduation Guidelines](https://www.cde.state.co.us/postsecondary/graduationguidelines) and outline the minimum requirements for high school graduation. For additional information, see CSI’s [Graduation Guidelines](https://resources.csi.state.co.us/graduation-guidelines/) webpage.
* **Notice of Nondiscrimination:** Schools must prominently publish a Notice of Nondiscrimination on the school website, in Parent/Student and Employee Handbooks, and in materials used in connection with student or employee recruitment. The notice should also be posted in multiple places in the school. A sample notice meeting the requirements established in the Final Title IX Rules will be made available to schools this Summer.
* **Parent Right to Know (if applicable)** Section 1112 of the Every Student Succeeds Act (ESSA) requires that schools receiving Title I, Part A funds annually advise parents of students of their right to request information on the professional qualifications of their student's classroom teachers. A sample notification is available [Parent Right to Know Sample Notification](https://resources.csi.state.co.us/parent-right-to-know-sample-notification/). For more information, see CDE’s [Parent Notification Requirements.](https://www.cde.state.co.us/fedprograms/parentnotificationrequirements)

*As a reminder, ESSA also requires schools receiving Title I, Part A funds provide to each parent timely notice when a student has been assigned, or has been taught for four or more consecutive weeks by, a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. Four-week notification letters should be sent out as applicable. For template letters, see* [*Family Engagement and Parent Right to Know*](https://resources.csi.state.co.us/title-i-part-a/)*.* * **Parent and Family Engagement (if applicable)** Section 1112 of the Every Student Succeeds Act (ESSA) requires that schools receiving Title I, Part A funds develop a written parent and family engagement policy and distribute the policy to parents and family members of participating students. More information is available on CDE’s [Parent Involvement](https://www.cde.state.co.us/fedprograms/ti/parents) webpage and on CSI’s [Family Engagement](https://resources.csi.state.co.us/title-i-part-a/) resource page.

\*If not included in the handbook, please submit evidence (e.g., copy of email, school newsletter, link to webpage, etc.) that the information was provided to families.**Instructions:** Upload a copy of the Parent/Student Handbook (and other documentation, as applicable) to Epicenter.**Additional Support:** Questions about this submission can be directed to legalandpolicy\_csi@csi.state.co.us. |
| 8/15/2024 | Safety, Readiness and Incident Management Plan  | **Rationale:** The [Colorado Safe Schools Act](https://resources.csi.state.co.us/wp-content/uploads/2021/05/School-Safety-Checklist_Updated_SA_PDF.pdf) (C.R.S. § 22-32-109.1(4)), [CSI’s Safe Schools Policy](http://www.boarddocs.com/co/csi/Board.nsf/goto?open&id=96A23M003CDF), and [CSI’s Safety Policy Supplement](http://www.boarddocs.com/co/csi/Board.nsf/goto?open&id=9DE2RP720076) require that schools develop a Safety, Readiness, and Incident Management Plan (also known as an Emergency Operations Plan). **Instructions:** Upload a copy of the Safety, Readiness and Incident Management Plan in Epicenter.**Additional Support**: The 2024-25 plan must address the feedback CSI provided during the 2023-24 Organizational Submissions Process. Helpful guidance documents and materials, including a School EOP Checklist can be retrieved on the [CSI School Safety page](https://resources.csi.state.co.us/school-safety/). Questions about the submission or previous feedback can be directed to legalandpolicy\_csi@csi.state.co.us.  |
| 8/30/2024 | Title IX Website and Training Certification | **Rationale:** The U.S. Department of Education’s 2024 [Final Title IX Rule](https://www.ed.gov/news/press-releases/us-department-education-releases-final-title-ix-regulations-providing-vital-protections-against-sex-discrimination) establishes new requirements for responding to and investigating complaints of sex-based discrimination or sex-based harassment and sets forth the following requirements for school websites and employee trainings:* **Notice of Nondiscrimination:** Schools must prominently publish a Notice of Nondiscrimination on the school website, in Parent/Student and Employee Handbooks, and in materials used in connection with student or employee recruitment. The notice should also be posted in multiple places in the school. A sample notice meeting the requirements established in the Final Title IX Rules will be made available to schools this Summer.
* **Title IX All-Staff Training:** Schools are required to conduct an all-staff training regarding the school’s obligation to address sex discrimination, the scope of conduct that constitutes Title IX sex discrimination, and related reporting and information-sharing requirements. In addition to the initial all-staff training, schools must ensure any new employee completes the training upon hire and all employees complete the training annually thereafter. CSI will provide an asynchronous training for use by schools. Additional information is forthcoming.
* **Title IX Role-Specific Training:** Schools are required to designate and train their core Title IX team on implementation of their roles. CSI will partner with experts to offer role-specific trainings for schools. Additional information is forthcoming.

**Instructions:** The new Title IX Regulations are effective August 1, 2024. Title IX website and training certifications must be submitted in Epicenter by August 30, 2024. Schools will certify that the Notice of Nondiscrimination and training requirements have been met and will submit a link to the Notice of Nondiscrimination for review by CSI. **Additional Support:** Questions about the submissions can be directed to legalandpolicy\_csi@csi.state.co.us. |
| 8/30/2024 | Assessment Calendar Website Certification | **Rationale:** C.R.S 22-7-1013(7), requires schools distribute to families an assessment calendar that: 1) describes the state and local assessments that will be administered during the school year, 2) identifies whether the assessment is required by federal law, state law, or selected by the school, 3) provides the dates the state and local assessments will be administered, and 4) describes the purposes of the state and local assessments and the manner in which CDE and the school use the results.**Instructions:** Schools should post the information on the school’s website as early in the school year as possible. Schools will certify in Epicenter that the Assessment Calendar has been posted and will submit a link to the calendar. CSI will audit the calendar to ensure compliance.**Additional Support:** Questions about the submissions can be directed to kaliwinn@csi.state.co.us.  |
| 11/1/2024 | New/Revised Policies  | **Rationale:** CSI will collect the following new/revised policies from schools:* **Discipline Policy:** C.R.S. 22-32-109.1 requires schools adopt a policy setting forth the manner in which disciplinary actions, including suspension and expulsion shall be imposed. The policy should establish due process requirements for the expulsion hearing process and set forth training requirements for expulsion hearing officers in a manner that aligns with C.R.S. 22-33-105 (as amended by [HB 23-1291](https://leg.colorado.gov/sites/default/files/documents/2023A/bills/2023a_1291_enr.pdf)).
* **Nondiscrimination/Equal Opportunity Policy:** Schools must adopt a nondiscrimination/equal opportunity policy prohibiting discrimination on the basis of a protected class. C.R.S. 22-1-143 (added under [HB 24-1039](https://leg.colorado.gov/sites/default/files/documents/2024A/bills/2024a_1039_enr.pdf)) states that harassment and discrimination includes the knowing or intentional use of a name other than a student’s chosen name, as defined in C.R.S. 22-1-145(1). Schools should revise their Nondiscrimination/Equal Opportunity Policy to align with [HB 24-1039](https://leg.colorado.gov/sites/default/files/documents/2024A/bills/2024a_1039_enr.pdf).
* **Sex-based Harassment Investigation Procedures:** The U.S. Department of Education’s 2024 [Final Title IX Rule](https://www.ed.gov/news/press-releases/us-department-education-releases-final-title-ix-regulations-providing-vital-protections-against-sex-discrimination) establishes new requirements for responding to and investigating complaints of sex-based discrimination or sex-based harassment. Schools must adopt a policy that aligns with the new requirements.
* **Harassment and Discrimination Investigation Procedures for Students:** C.R.S. 22-1-143 (added under [SB 23-296](https://leg.colorado.gov/sites/default/files/documents/2023A/bills/2023a_296_enr.pdf)) requires schools adopt a policy setting forth procedures for responding to and investigating complaints of harassment and discrimination against students. This policy must be separate from, and in addition to, the school’s Sex-based Harassment Investigation Procedures.
* **Grievance Policy:** A school’s grievance policy should be revised so that complainants are appropriately directed to alternate processes for complaints of: 1) harassment and discrimination and bullying based on a protected class, and 2) sex-based discrimination or sex-based harassment.

**Instructions:** Schools will certify that they have adopted and/or revised the following policies to align with recent changes to federal and state law: 1) Discipline Policy, 2) Nondiscrimination/Equal Opportunity Policy, 3) Sex-based Harassment Investigation Procedures, 4) Harassment and Discrimination Investigation Procedures for Students, and 5) Grievance Policy. Schools will submit a copy of any policy that is substantially different from the CSI model policy. Sample policies will be made available to schools this Summer. **Additional Support:** Questions about the submission can be directed to legalandpolicy\_csi@csi.state.co.us. |
| 11/1/2024 | Harassment and Discrimination Policy Website Certification | **Rationale:** C.R.S. 22-1-143 (added under [SB 23-296](https://leg.colorado.gov/sites/default/files/2023a_296_signed.pdf)) requires schools post a link to their Harassment and Discrimination Investigation Procedures Policy on the homepage of their website.**Instructions:** Schools will certify that a link to the Harassment and Discrimination Investigation Procedures Policy has been posted to the homepage of their website. CSI will audit the webpage to ensure compliance.**Additional Support:** Questions about the submission can be directed to legalandpolicy\_csi@csi.state.co.us. |
| 11/1/2024 | Colorado Open Meetings Law Website Certification | **Rationale:** C.R.S. § 24-6-401, et seq., establishes requirements for open meetings. Schools should post the following board information in compliance with Colorado Open Meetings laws, the charter contract, and CSI policies:* board membership and contact information for the board or board chair
* board meeting schedule/calendar; and
* board meeting notices, agendas, and minutes.

**Instructions:** Schools will certify compliance with the Colorado Open Meetings law in Epicenter and will submit a link to the webpage where the required information is posted. CSI will audit the board webpage to ensure compliance.**Additional Support:** Questions about the submission can be directed to legalandpolicy\_csi@csi.state.co.us. |
| 11/1/2024 | Accessibility Website Certification | CSI and CSI schools are required under applicable law to ensure accessibility compliance for individuals with disabilities for all technology, hardware, and software, that is both public-facing and internal-facing. Schools must meet **one** of the following:1. Comply with accessibility requirements by July 1, 2024 as outlined in [HB21-1110](https://leg.colorado.gov/sites/default/files/2021a_1110_signed.pdf) (C.R.S. § [24-34-301](https://advance.lexis.com/documentpage/?pdmfid=1000516&crid=ae9dda24-1138-4576-98ba-69d636c7dbc6&config=014FJAAyNGJkY2Y4Zi1mNjgyLTRkN2YtYmE4OS03NTYzNzYzOTg0OGEKAFBvZENhdGFsb2d592qv2Kywlf8caKqYROP5&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A68B0-9C83-GXF6-82JN-00008-00&pdcontentcomponentid=234176&pdteaserkey=sr0&pditab=allpods&ecomp=6s65kkk&earg=sr0&prid=2c6b983f-539e-46ff-b74f-5136da10cfba)).

**OR**1. To be eligible for the July 1, 2025 extension, demonstrate a good faith effort towards compliance, including posting a progress-to-date document on your website that is reviewed/updated quarterly and provides specific efforts towards compliance as outlined in [HB24-1454](https://leg.colorado.gov/sites/default/files/2024a_1454_signed.pdf) (C.R.S. § [24-34-802](https://advance.lexis.com/documentpage/?pdmfid=1000516&crid=5e86c862-0417-49cf-ad34-4ea3d84bc7ce&config=014FJAAyNGJkY2Y4Zi1mNjgyLTRkN2YtYmE4OS03NTYzNzYzOTg0OGEKAFBvZENhdGFsb2d592qv2Kywlf8caKqYROP5&pddocfullpath=%2Fshared%2Fdocument%2Fstatutes-legislation%2Furn%3AcontentItem%3A68C5-3513-CGX8-037Y-00008-00&pdcontentcomponentid=234176&pdteaserkey=sr0&pditab=allpods&ecomp=6s65kkk&earg=sr0&prid=e1ea5a61-c05f-4d22-b847-e2f0d0b60dc4)).

**Instructions:** Schools will complete a form in Epicenter identifying whether the school is either 1) currently in compliance with accessibility standards (fulfilling [HB21-1110](https://leg.colorado.gov/sites/default/files/2021a_1110_signed.pdf)) or 2) making a good faith effort towards compliance, including posting a progress document on your website, to ensure compliance with accessibility standards by July 1, 2025.**Additional Support:** Additional guidance can be found on [OIT’s website](https://oit.colorado.gov/hb21-1110-faq) and [CSI’s website](https://resources.csi.state.co.us/accessibility/).Questions about this submission can be directed to Communications\_csi@csi.state.co.us. |
| 1/1/2025 | New Student Application Website Certification | **Rationale:** CSI schools are subject to all federal and state laws regarding nondiscrimination and cannot create undue barriers that have the effect of excluding certain students from enrollment. **Instructions:** Schools will certify compliance with federal and state laws regarding nondiscriminatory enrollment practices. CSI will conduct a website audit to ensure CSI schools are welcoming to all students, and that new student application forms do not create undue barriers or have the effect of excluding students. **Schools should complete the certification before admissions opens for the next school year, but no later than January 1, 2025.****Additional Support:** Questions about the submission can be directed to legalandpolicy\_csi@csi.state.co.us. |
| 1/1/2025 | School Admissions Staff Training Certification | **Rationale:** 1 CCR 301-88, Section 2.02(E)(5) requires charter schools conduct an annual training for admissions staff on federal protections against pre-enrollment inquiries about disability status for students and on when it is appropriate to inquire about disability status post-admission. CSI will record and make a training available for use by schools this Fall**. School admissions staff should complete the training before admissions opens for the next school year, but no later than January 1, 2025.****Instructions:** Schools will certify in Epicenter that school admissions staff have completed the required training established in 1 CCR 301-88.**Additional Support:** Questions about the submission can be directed to legalandpolicy\_csi@csi.state.co.us. |
| 1/1/2025 | Expulsion Hearing Officer Training Certification | **Rationale:** C.R.S. 22-33-105 (as amended by [HB 23-1291](https://leg.colorado.gov/sites/default/files/documents/2023A/bills/2023a_1291_enr.pdf)) requires school expulsion hearing officers complete a training on how to serve impartially, including avoiding prejudgment of the facts and conflicts of interest. Schools must also ensure the hearing officer completed an annual training to stay informed on school discipline updates. CDE is developing the online modules which will be available starting July 2024.**Instructions:** Schools will certify in Epicenter that the school expulsion hearing officer has completed the required training established in [HB 23-1291](https://leg.colorado.gov/sites/default/files/documents/2023A/bills/2023a_1291_enr.pdf).**Additional Support:** Questions about the submission can be directed to legalandpolicy\_csi@csi.state.co.us. |