

# OPPORTUNITY NETWORK OPERATIONAL WALKTHROUGH 2019-2020

Program Name: YES Philly

Provider: Youth Empowerment Services d/b/a YESPhilly

#### OPERATIONAL WALKTHROUGH OVERVIEW

Operational Walkthroughs for all Opportunity Network contract programs focused on the systems and structures that are required to deliver high quality instruction to students. Operational Walkthroughs assessed program performance across three domains: 1) Academic & School Climate Accountability; 2) Organizational Compliance; and 3) Accommodative & Financial Compliance. Taken together, the three domains encompass key operational expectations that are based on the program's contract with The School District of Philadelphia, as well as applicable federal, state and local laws.

Operational Walkthroughs are one part of the School District's three-part approach to the formal annual evaluation of all contracted Opportunity Network programs. In addition to Operational Walkthroughs, Instructional Walkthroughs and Alternative Education Progress Reports (AEPR) provide qualitative and quantitative data for program performance that inform decisions related to contract renewal, termination, and program expansion. This report summarizes the program's performance for each of the three domains reviewed during the Operational Walkthrough. In addition, this report provides ratings for select contract requirements indicating whether the program met those requirements or standards based on evidence reviewed during the Operational Walkthrough.

A  $\checkmark$  indicates that the program met the contract requirement. A \* indicates that the program did not meet the contract requirement. The basis for the rating is provided in the Additional Notes section for each standard.

#### **GENERAL INFORMATION**

Walkthrough Date: December 6, 2019

Contract Term: FY 2018- FY 2022

Program Type: Accelerated (Grades 9-12)

### CONTACT INFORMATION

2709 N. Broad Street, 4th Floor, Philadelphia, PA 19132

Phone: 215-769-0340

Webpage: https://yesphilly.org/

#### **MISSION**

"The mission of YESPhilly is to develop a broad base of opportunities for Philadelphia's out-of-school youth to prepare them to become successful, self-sufficient adults. We have developed an educational model that prepares students for college and careers by tying together personal development, media arts and technology skills, and academic instruction to meet Pennsylvania standards for high school."

#### PROGRAM LEADERSHIP

Gary Paprocki, Executive Director

David Riviore, Contracted Principal

Shanta Richardson, Team Lead, Special Education,

Postsecondary, and Compliance

#### WALKTHROUGH REVIEW TEAM

DawnLynne Kacer, Executive Director, Opportunity Network

Majeedah Scott, Director, Office of Multiple Pathways to Graduation

Marcus De Vose, Assistant Director, Transition Services

Seth Morones, Strategy Analyst II, Opportunity Network

Rachel Malloy-Good, Special Education Case Manager

## OPERATIONAL WALKTHROUGH 2019-2020 YES PHILLY

The School District of Philadelphia's official demographic information is reported on October 1<sup>st</sup> of each school year. The Opportunity Network's demographic information is reported here as of January 31<sup>st</sup>, 2020 to more closely align with the student population on the date of the walkthrough.

# **ENROLLMENT INFORMATION**

Enrollment on 1/31/20

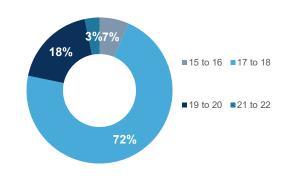
92 • SY 2018 2019: 10

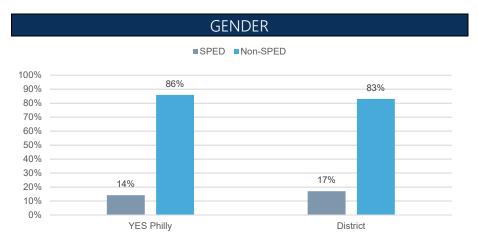
Contracted Maximum

100

#### **RACE & ETHNICITY** ■YES Philly ■District 100% 89% 90% 80% 70% 52% 60% 50% 40% 30% 21% 14% 20% 7% 6% 4% 3% 3% 10% 0% 0% Hispanic/Latino White African American Asian Multiracial/Other

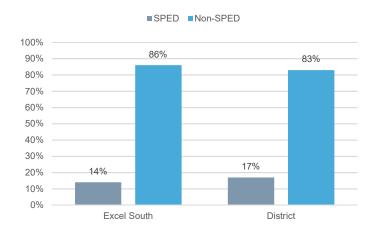
#### **ENROLLMENT BY AGE**



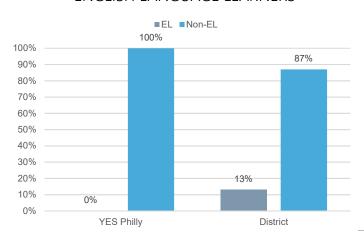


### **DIVERSE LEARNERS**

#### SPECIAL EDUCATION



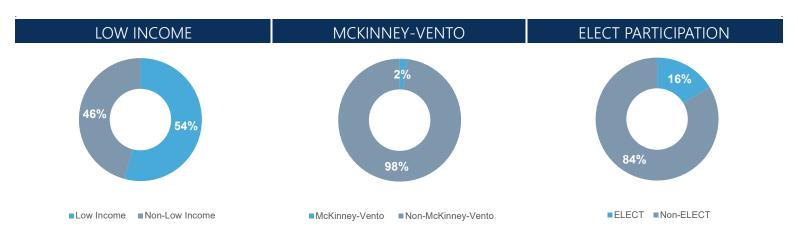
#### ENGLISH LANGUAGE LEARNERS



#### **OPERATIONAL WALKTHROUGH 2019-2020**

#### YES PHILLY

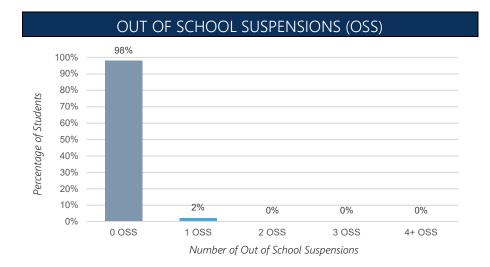
All data for attendance, student conduct, low income, McKinney-Vento, and Education Leading to Employment and Career Training (ELECT) participation reflect enrollment as of January 2020 to more closely align with the student population on the date of the walkthrough.

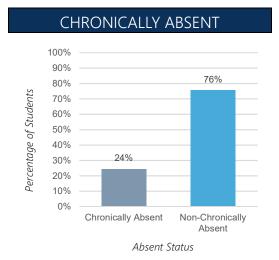


Low income status is calculated by the number of students who are eligible for free school meals.

The McKinney-Vento Homeless Education Assistance Act guarantees a free and appropriate public education for all children and youth experiencing homelessness.

The Philadelphia ELECT program is a comprehensive network of education, health, and support services designed to assist pregnant and parenting teens in completing their education and becoming selfsufficient.





# PERFORMANCE SUMMARY: ALL DOMAINS

#### DOMAIN 1: ACADEMIC & SCHOOL CLIMATE ACCOUNTABILITY

The table below summarizes the number of standards by category that met expectations consistent with contract requirements during the 2018-2019 Operational Walkthrough. Information regarding how standards in the Academic and School Climate Accountability domain are measured can be found in the performance framework for Opportunity Network contract programs.

| CATEGORY                        | REQUIREMENTS MET |
|---------------------------------|------------------|
| Academic Quality (Page 4)       | 4 / 5            |
| School Climate Quality (Page 5) | 5 / 6            |
| TOTAL                           | 9 / 11           |

## DOMAIN 2: ORGANIZATIONAL COMPLIANCE

The table below summarizes the number of standards by category that met expectations consistent with contract requirements during the 2018-2019 Operational Walkthrough. Information regarding how standards in the Organizational Compliance domain are measured can be found in the performance framework for Opportunity Network contract programs.

| CATEGORY   | requirements met |
|--|------------------|
| Student Progress Monitoring & Reporting (Page 7) | 7 / 8            |
| Record Keeping & Communication (Page 9)          | 3 / 4            |
| Personnel (Page 10)                              | 4/7              |
| Governance & Enrollment (Page 12)                | 4/5              |
| TOTAL  | 18 / 24          |

### DOMAIN 3: ACCOMMODATIVE & FINANCIAL COMPLIANCE

The table below summarizes the number of standards by category that met expectations consistent with contract requirements during the 2018-2019 Operational Walkthrough. Information regarding how standards in the Accommodative & Financial Compliance domain are measured can be found in the performance framework for Opportunity Network contract programs.

| CATEGORY                        | requirements met |
|---------------------------------|------------------|
| Accommodative Quality (Page 13) | 5 /5             |
| Financial Compliance (Page 15)  | 3/3              |
| TOTAL                           | 8/8              |

# CATEGORY I: ACADEMIC QUALITY

**STANDARD: CURRICULAR QUALITY** – Evidence of systems and structures to ensure quality curriculum and instruction offered by contractor

| CONTRACT REQUIREMENTS  | RATING   | additional notes   |
|--|----------|--|
| BASELINE and REQUIRED ASSESSMENTS:  Offers baseline (pre-test) and required assessments (Basic Assessment in Reading & Math, PA PSSA/Keystone Exams, P/SATs) for academic progress monitoring. | ×        | Less than 80% of eligible students had both pre- and post- test scores from the Basic Assessment in Reading & Math (MAP) during the 2018-2019 school year (reading 29%; math 35%). |
| BEHAVIOR MODIFICATION/CHARACTER EDUCATION:  Educational program offered includes behavior modification/character education.  | <b>✓</b> | The program offers counseling and groups to address relationships, interpersonal skills, sexual health and challenges faced by students.   |

**STANDARD: STUDENT PERFORMANCE** – Evidence of systems and structures to ensure expected student progress in the program as defined in the AEPR and consistent with contract expectations

| CONTRACT REQUIREMENTS  | RATING   | additional notes   |
|--|----------|--|
| ACADEMIC ACHIEVEMENT:  Collects and uses data to track and monitor student progress data to evaluate academic achievement and makes appropriate instructional shifts and/or differentiate instruction. | <b>✓</b> | Program maintains and actively uses real-time academic progress data to monitor student performance. Data is used to determine which students need interventions and/or remedial supports. Academic goal setting and improvement plans were evident in the Summit Learning platform. |
| POST-SECONDARY READINESS:  Collects and uses data to track and monitor student post-secondary readiness.   | <b>✓</b> |  |
| ACADEMIC PERFORMANCE BARRIERS:  Collects and uses data to track and monitor school climate and identifies appropriate student supports to improve school climate outcomes.                             | <b>✓</b> |  |

# **CATEGORY 2: SCHOOL CLIMATE QUALITY**

**STANDARD: DISCIPLINE MANAGEMENT** – Evidence of systems, structures and contractor efforts to effectively manage student behavior and employ positive behavior intervention & supports system

| CONTRACT REQUIREMENTS  | RATING   | ADDITIONAL NOTES   |
|--|----------|--|
| RESTORATIVE JUSTICE and POSITIVE CLIMATE PRACTICES:  Employs restorative justice practices (e.g. facilitated mediation, reflective writing, peer court/advising).  Evidence of policies and practices to combat bullying including cyber bullying. | <b>√</b> | Evidence of restorative circles, mediation, and community service actions that are facilitated by the climate team.  |
| STUDENT INCENTIVES:  Employs developmentally appropriate individual or group based incentives (e.g. admission to school events, recognition awards, tangible rewards).   | <b>√</b> | Evidence of incentives for high achievers and students with significant improvement in academics or attendance, including bi-weekly recognition awards, trimester awards, field trips, gift cards, special lunches. Students also recognized for embodying the values of YES Philly (e.g., fully engaged; motivated learners). |
| TAILORED SOCIO-EMOTIONAL DEVELOPMENT PLANS:  Develops and implements plan within 30 days of receiving student and adheres to personalized socioemotional development plans.  | <b>✓</b> | The program's behavior and support system compiles all staff-reported student behavioral concerns and is used to drive individualized interventions and supports.  |

**STANDARD: ATTENDANCE & DISCIPLINE REPORTING** – Evidence of systems, structures and contractor efforts to track, monitor and report student attendance and behavior, including compliance with Safe Schools Act

| CONTRACT REQUIREMENTS  | rating   | additional notes  |
|--|----------|---|
| DRILLS and SAFETY REPORTING:  Conducts and reports appropriate school safety drills, designates rally and shelter-in-place locations, and reports school safety incidents as required. | ×        | Drills are conducted and reported as required. Vital Information Packet missing the Vital Information section that is used to identify students and staff in the event of an emergency. |
| CODE of CONDUCT:  Adopts and provides to students a code of conduct aligned to School District's Code of Conduct.  | <b>✓</b> |   |

# DOMAIN I: ACADEMIC & SCHOOL CLIMATE ACCOUNTABILITY

| CONTRACT REQUIREMENTS  | RATING   | additional notes  |
|--|----------|---|
| TRUANCY and DISCIPLINE REPORTING:  Accurate and timely reporting of attendance, truancy and disciplinary incidents as required by contract.  Develops Student Attendance Improvement Plans (SAIP) and communicates with parents/guardians timely to prevent chronic absenteeism. | <b>✓</b> | Program consistently develops comprehensive attendance improvement plans for chronically absent students. SAIPs were evident in SIS (57 SAIPs entered at time of walkthrough; closely aligns with percentage of chronically absent students). |

#### CATEGORY 1: STUDENT PROGRESS MONITORING & REPORTING

**STANDARD: STUDENT LEVEL PLANS** – Evidence that contractor creates, maintains and effectively implements student-level plans for learning, behavior and post-secondary and communicates student progress to student and family for all students

| CONTRACT REQUIREMENTS  | RATING            | additional notes   |
|--|-------------------|--|
| PERSONALIZED LEARNING PLANS (AEDY Transition & Continuation only):  Creation (upon enrollment of student) of a Personalized Learning Plan that includes a Transition Plan for student to return to School District.  | Not<br>applicable |  |
| PERIODIC ACADEMIC and BEHAVIOR REPORTING:  Provides timely reporting of student academic progress (on quarterly or semester basis to students, parents and/or guardians) including information for coursework attempted/completed, level of achievement and progress, behavior and attendance. | <b>✓</b>          | The program distributes SIS-generated report cards and transcripts. Students receive a Graduation Review during each term to monitor credits earned, credits remaining and expected graduation date. |
| GRADUATION AND POST-SECONDARY PLANS:  Creation and maintenance of plan for progress towards graduation (including credits needed) and a student-specific post-secondary plan aligned to student interests.   | <b>✓</b>          |  |

**STANDARD: DIVERSE LEARNER POPULATION** – Evidence of systems, structures and contractor policies to appropriately identify, support and monitor instruction for special education students and English Learners (ELs)

| CONTRACT REQUIREMENTS   | RATING   | additional notes  |
|---|----------|---|
| ENROLLMENT of SPECIAL EDUCATION STUDENTS: Enrolls special education population no less than 15% and no greater than 20% of the program capacity.  | ×        | At the time of the walkthrough there were 12 students enrolled with IEPs out of the contracted maximum of 100 students (12%). |
| BASELINE MEASURES:  Provides baseline measures for both special education and EL students against which to monitor growth.  Monitors progress toward IEP goals and communicates this progress routinely to parents/guardians. | <b>✓</b> |   |

| CONTRACT REQUIREMENTS  | RATING   | additional notes  |
|--|----------|---|
| IEP IDENTIFICATION, EVALUATION & REVIEW: Identifies, evaluates, reviews and implements IEPs timely and with fidelity, in accordance with applicable laws.  | <b>✓</b> |   |
| ANNUAL IEP UPDATES:  Ensures IEPs are updated on an annual basis according to federal and state directives including December 1 Child Count compliance. Includes Transition Services in IEPs for students 14 years or older. Documents participation of all required IEP team members. | <b>✓</b> | 12 of 12 IEPs were in compliance for December<br>1 Child Count (100% compliance). |
| IEP MEETINGS:  Assumes lead role for scheduling, convening, and completion of IEP meetings as well as all special education related paperwork. Collaborates with the School District as necessary and appropriate to support students.   | <b>✓</b> |   |
| EL IDENTIFICATION, EVALUATION & REVIEW:  Identifies potential ELs using the Home Language Survey, evaluates students using screener, and assesses ELs annually using ACCESS exam to provide all required services for success of EL students.  | <b>✓</b> | Home language survey evident in 10 of 10 enrollment files reviewed.               |

#### CATEGORY 2: RECORD KEEPING & COMMUNICATION

**STANDARD: COMMUNICATIONS WITH SCHOOL DISTRICT** – Evidence that contractor timely and accurately reports information to the School District either directly or via provided systems consistent with contract requirements and written updates from the School District

| CONTRACT REQUIREMENTS   | RATING | additional notes |
|---|--------|------------------|
| STUDENT INFORMATION SYSTEM UPLOAD:  |        |                  |
| Provides student enrollment, attendance, behavior and coursework information to School District (via SIS) within contractually outlined period. | •      |                  |
| ARCHIVE OF HISTORICAL RECORDS:  | 1      |                  |
| Maintains an archive of all historical student academic and behavioral records.   | •      |                  |

**STANDARD: COMMUNICATIONS WITH STUDENTS, PARENTS/GUARDIANS AND FAMILIES** – Evidence that contractor communicates timely and accurately with students, parents/guardians and families regarding student performance and progress in a manner accessible to all; protects student record information

| stadent periormance and progress in a mariner decessione to any protects stadent receive information   |          |  |
|--|----------|--|
| CONTRACT REQUIREMENTS  | rating   | additional notes   |
| SECURE PERSONALLY IDENTIFIABLE INFORMATION: Secures personally identifiable information, does not request or require prohibited information at time of enrollment (e.g. SSNs), and ensures that if student is 18+ years of age, student provides consent to release records.   | *        | 10 of 10 enrollment files reviewed included social security card, custody order, or DHS findings. Recommended that the program maintain these documents in counselor files and ensure that they are not requested or required for enrollment.  |
| ENGAGEMENT WITH PARENTS/GUARDIANS AND FAMILIES:  Contractor ensures that it communicates with all stakeholders as appropriate to maintain levels of engagement including reporting of student academic progress, information regarding program events (e.g. back to school nights) and student expectations (e.g. orientation and handbook) in a manner that is accessible to all. | <b>✓</b> | The program has a written plan to engage parents/guardians throughout the school year. Evidence of regular communication with parents/guardians using Remind application and social media platforms. Evidence of various events for families (e.g., back to school night, report conferences, student recognition ceremonies). |

#### **CATEGORY 3: PERSONNEL**

STANDARD: BACKGROUND CHECKS, LICENSES & EDUCATOR CERTIFICATION – Evidence of contractor compliance with relevant contract, state and federal educator personnel requirements

| compliance with relevant contract, state and rederal educator personner requirements   |          |   |
|--|----------|---|
| CONTRACT REQUIREMENTS  | RATING   | additional notes  |
| EMPLOYEE BACKGROUND CHECKS:  Provides evidence of all relevant employee background checks and clearances. Checks and clearances are valid, timely and up to date as appropriate. | <b>✓</b> | PA Criminal History Check: 6 of 6 employees reviewed had a valid check on file.  PA Child Abuse Clearance: 6 of 6 employees reviewed had a valid clearance on file.  FBI Background Check: 6 of 6 employees reviewed had a valid check on file.  Act 168 documentation: 6 of 6 eligible employees reviewed had documentation on file. |
| PROFESSIONAL CERTIFICATIONS:  Provides PA certificated teachers in all core instructional areas.   | ×        | Teachers of record for science and social studies are not PA certified for the subjects that they teach. Program noted that social studies teacher plans to enroll in a certification program, and science teacher is scheduled to take the praxis exam in January 2020.  |

# OPERATIONAL WALKTHROUGH 2019-2020 YES PHILLY

| CONTRACT REQUIREMENTS  | RATING   | Additional notes  |
|--|----------|---|
| PROFESSIONAL CERTIFICATIONS (ADMINISTRATOR): Provides at least one PA certificated administrator per site.   | <b>✓</b> | The program has contracted with a part-time, PA certified principal on a temporary basis. The program must hire a permanent and full-time PA certified administrator before July 1, 2020.   |
| STUDENT SUPPORT SERVICES STAFF:  Provides sufficiently trained and certified/licensed professional staff for student support services including special education and ELs. | *        | Although no EL students were enrolled at the time of the walkthrough, the program does not have a certified ESOL teacher on staff. The program does not have a certified special education teacher on staff. Program noted that its current Special Education coordinator will complete a certification program in June 2020. |

**STANDARD: PERSONNEL RATIO & PROFESSIONAL DEVELOPMENT** – Evidence of contractor adherence to contractual Personnel Ratios, contractually or statutorily required trainings, and relevant staff professional development

| CONTRACT REQUIREMENTS  | RATING   | additional notes   |
|--|----------|--|
| PERSONNEL RATIOS: Provides staffing to meet contractual student to teacher ratios and ensures student to support staff ratio is within contractual limits.   | <b>✓</b> |  |
| OBLIGATORY TRAININGS:  Provides all employees with Act 71, Act 126, and other obligatory PDE professional trainings and monitors timely completion and updates as required.  | ×        | Act 71 Training: 5 of 6 employees and contractors reviewed had a completion certificate on file.  Act 126 Training: 5 of 6 employees and contractors reviewed had a completion certificate on file for the required 3-hour training. |
| ENGAGEMENT IN DISTRICT PROFESSIONAL DEVELOPMENT AND CONTRACTOR MEETINGS:  Ensures that teachers and administrators engage in School District professional development opportunities and monthly contractor meetings. | <b>✓</b> |  |

#### **CATEGORY 4: GOVERNANCE & ENROLLMENT**

**STANDARD: PROGRAM GOVERNANCE** – Evidence of systems, structures and contractor activities to support compliance with contractual expectations for program governance

| CONTRACT REQUIREMENTS   | RATING   | additional notes   |
|---|----------|--|
| COMMUNITY ENGAGEMENT:  Engages community and non-profit providers to provide a diverse and relevant range of non-academic student services and support.   | <b>✓</b> | The program partners with numerous non-<br>profit and community-based organizations to<br>provide enrichment, career exposure, social-<br>emotional supports, and first year college<br>matriculation support to students. |
| COMMUNITY ELICITATION:  Has active school or community advisory board or process by which the school community can provide input and feedback to the contractor regarding the program. Encourages parent/guardian participation in the District-wide annual survey. | <b>✓</b> | 10.6% parent participation in the 2018-2019 District-wide Survey (at least 10% required).  |

**STANDARD: STUDENT ENROLLMENT** – Evidence of systems, structures and contractor practices to meet contractual and statutory requirements for student enrollment and eliminate barriers to entry

| CONTRACT REQUIREMENTS   | RATING   | additional notes   |
|---|----------|--|
| TIMELY ENROLLMENT:  |          |  |
| Contractor does not create barriers to enrollment and enrolls students referred and/or who apply timely. Enrollment and/or student files contain information as required by PDE for enrollment. Program has procedures in place to confirm eligibility of students prior to enrollment. | <b>✓</b> |  |
| RESIDENCY REQUIREMENT:  |          | No known issues with the program enrolling   |
| Contractor does not serve students from other LEAs without written consent of School District. Contractor confirms residency of student prior to or at time of enrollment.  | *        | students from other LEAs, however, only 5 of 10 student enrollment files reviewed included proof of residency. |
| RE-ENGAGEMENT CENTER REFERRALS:   |          |  |
| Contractor has reserved 50% of seats for School District's Engagement Center (REC) and/or partners with the REC to receive referrals.   | <b>√</b> |  |

### DOMAIN 3: ACCOMMODATIVE & FINANCIAL COMPLIANCE

# CATEGORY I:ACCOMMODATIVE QUALITY

**STANDARD: FACILITIES** – Evidence of contractor compliance with established facility guidelines, contractual/statutory requirements and lease terms (if in School District-owned properties)

| CONTRACT REQUIREMENTS  | RATING   | ADDITIONAL NOTES |
|--|----------|------------------|
| FEDERAL, STATE, & LOCAL REGULATIONS:  Complies with all federal and state regulations regarding access to individuals with (physical or otherwise) disabilities. The program is housed in a non-sectarian facility. If in a privately-owned facility, contractor is compliant with any local requirements for facility condition including lead and water testing. | <b>✓</b> |                  |
| FACILITY MAINTENANCE:  For privately-owned facilities, contractor maintains regular upkeep of facility including structure, student and staff related spaces as well as outside grounds. For School District-owned facilities, contactor fulfills the obligations of their lease agreement regarding maintenance and reports facility condition issues timely.     | <b>✓</b> |                  |

**STANDARD: SCHOOL CALENDAR, TRANSPORTATION AND UNIFORMS** – Evidence that contractor operates a program that meets the minimum number of days of instruction as required by the contract and makes the program accessible to all eligible students

| CONTRACT REQUIREMENTS   | RATING   | additional notes |
|---|----------|------------------|
| CALENDAR:   |          |                  |
| Maintains an academic calendar that minimally has at least as many instructional days as that of the School District. Submits operational calendars timely and appropriately notifies the School District departments of any changes in the calendar. | <b>✓</b> |                  |

# OPERATIONAL WALKTHROUGH 2019-2020 YES PHILLY

| CONTRACT REQUIREMENTS  | RATING   | Additional notes |
|--|----------|------------------|
| TRANSPORTATION:  |          |                  |
| Maintains accurate student information to allow the School District to appropriately manage transportation services for students. No corrective action initiated regarding required student transpass usage reports.   | <b>✓</b> |                  |
| UNIFORMS:  |          |                  |
| Establishes a clear dress code for students inclusive of expectations regarding school uniform. Provides uniforms to students upon request due to financial need. Does not have policies or practices that create barriers to instruction based on dress code or school uniform. | <b>√</b> |                  |

#### CATEGORY 2: FINANCIAL COMPLIANCE

**STANDARD: PROCUREMENT OF OPERATING CERTIFICATES** – Contractor provides School District with relevant operating licenses and certificates; maintains current insurance consistent with contract requirements

| CONTRACT REQUIREMENTS   | RATING   | additional notes |
|---|----------|------------------|
| TAX LIABILITIES:  |          |                  |
| Provides School District with Certificate of Tax<br>Clearance absolving any city tax liabilities.   | <b>√</b> |                  |
| PROOF OF INSURANCE:   |          |                  |
| Provides Proof of Insurance related to: (1) Worker's Compensation and Employer's Liability, (2) General Liability Insurance, (3) Automobile Liability Insurance, (4) Professional Liability Insurance, (5) Educator Legal Liability Insurance, (6) Excess/Umbrella Liability, and (7) Directors' and Officers' Liability Insurance. | <b>✓</b> |                  |

# DOMAIN 3: ACCOMMODATIVE & FINANCIAL COMPLIANCE

**STANDARD: FINANCIAL MANAGEMENT AND REPORTING** – Evidence the contractor adheres to standards of financial management including with monitoring and reporting of revenues and expenses, invoicing to the School District and ability of contractor to maintain financial viability

| CONTRACT REQUIREMENTS   | RATING            | additional notes |
|---|-------------------|------------------|
| FINANCIAL MANAGEMENT:   |                   |                  |
| Provides detailed information upon request regarding program annual budgets, as well as actual expenses and revenues. Upon request, provides independent third-party financial audit timely; audit does not indicate any material weakness or going concerns. | Not<br>applicable |                  |
| MONTHLY INVOICING:  Submits monthly invoices timely with complete and accurate student-level information. Information provided can generally be validated against the School District's SIS.  | <b>✓</b>          |                  |