

OPPORTUNITY NETWORK OPERATIONAL WALKTHROUGH 2020-2021

Program Name: One Bright Ray Simpson

Provider: International Education and Community Initiatives d/b/a One Bright Ray, Inc.

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. Due to COVID-19 all Operational Walkthroughs were conducted virtually but areas of review remained unchanged.

A \checkmark indicates that the program met the contract requirement. A $\stackrel{\checkmark}{\triangleright}$ 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 18, 2020

Contract Term: FY 2018- FY 2022

Program Type: Accelerated (Grades 9-12)

CONTACT INFORMATION

1142 E. Erie Avenue, Philadelphia, PA 19124

Phone: 215-744-6000

Webpage: http://www.onebrightraycommunity.org/

MISSION

"The mission of One Bright Ray Community High School is to provide a quality education to urban, over-aged and under-credited students in search of a positive school experience while earning their high school diploma. We challenge each student to explore his/her personal and academic potential through our accelerated Project Based curriculum and respectful relationships."

PROGRAM LEADERSHIP

Marcus A. Delgado, Chief Executive Officer

Joycet Velasquez, Chief Academic Officer

Marta Lasiy, Principal

Elizabeth White, Dean of Students

Lori Rouhana, Educational Support Teacher

Kate Rymer, ESL Teacher

WALKTHROUGH REVIEW TEAM

Majeedah Scott, Director, Office of Multiple Pathways to Graduation

Marcus De Vose, Assistant Director, Transition Services

Seth Morones, Strategy Analyst II, Opportunity Network

Jazzmyn Mills, Customer Support Liaison, Re-engagement Center

Jennifer Szwec, Special Education Case Manager

Sarah Karpovich, Special Education Case Manager

The School District of Philadelphia's official demographic information is reported on October 1st of each school year. The Opportunity Network's demographic information is reported here as of February 2021 to more closely align with the student population on the date of the walkthrough.

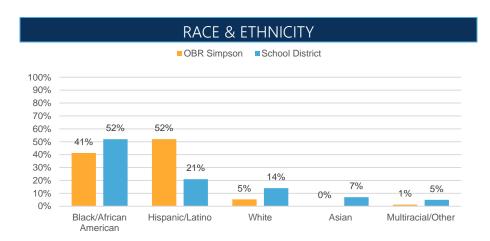
ENROLLMENT INFORMATION

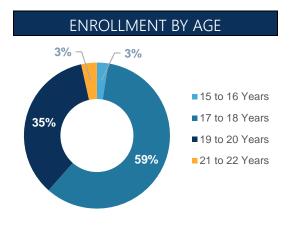
Enrollment as of February 2021

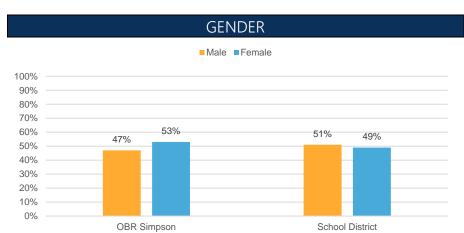
317 **•** SY 2019-

Contracted Maximum

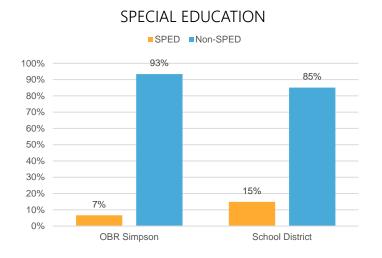
270







DIVERSE LEARNERS



■EL ■Non-EL 100% 90% 87% 90% 80% 70% 60% 50% 40% 30% 20% 13% 10% 10% 0% **OBR Simpson** School District

ENGLISH LEARNERS

OPERATIONAL WALKTHROUGH 2020-2021

ONE BRIGHT RAY SIMPSON

PROGRAM DATA

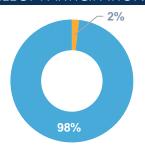
All data for attendance, student conduct, low income, McKinney-Vento, and Education Leading to Employment and Career Training (ELECT) participation reflect enrollment as of February 2021 to more closely align with the student population on the date of the walkthrough.

LOW INCOME

MCKINNEY-VENTO

ELECT PARTICIPATION

Low income data is unavailable for One Bright Ray – Simpson. No McKinney-Vento students enrolled at One Bright Ray – Simpson as of February 2021.



■ELECT ■Non-ELECT

Low income status is calculated by the number of students directly certified as receiving public assistance.

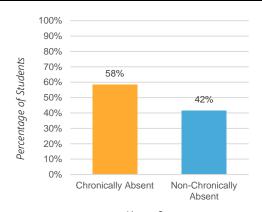
The McKinney-Vento Homeless Education Assistance Act guarantees a free and appropriate public education for all children and youth experiencing homelessness.

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.

OUT OF SCHOOL SUSPENSIONS SY2020-21

There were no suspensions at One Bright Ray – Simpson as of February 2021 school year to date.

CHRONICALLY ABSENT SY2020-21



Absent Status

Students are considered chronically absent if they accrue 10 or more unexcused absences within a 45-day period.

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 2020-2021 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 5)	4/5
School Climate Quality (Page 6)	4 / 6
TOTAL	8 / 11

DOMAIN 2: ORGANIZATIONAL COMPLIANCE

The table below summarizes the number of standards by category that met expectations consistent with contract requirements during the 2020-2021 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 8)	4 / 8
Record Keeping & Communication (Page 9)	3 / 4
Personnel (Page 11)	4 / 7
Governance & Enrollment (Page 12)	3 / 5
TOTAL	14 / 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 2020-2021 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 14)	3/3
Financial Compliance (Page 15)	3 / 4
TOTAL	6/7

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 SY 2020-2021 pre-assessment scores for the Basic Assessment in Reading & Math (reading 32.7%; math 29%). However, evidence was observed of systems to track and monitor assessment participation as well as flexible scheduling for administrations.
BEHAVIOR MODIFICATION/CHARACTER EDUCATION: Educational program offered includes behavior modification/character education.	✓	Character education is delivered through the program's student professional development classes and specialized workshops (e.g., Girl Talk, parenting, stress management). Student professional development exposes students to topics such as growth mindset and effective habits of successful people.

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

progress in the program as defined in the AETN and consistent with contract expectations		
CONTRACT REQUIREMENTS	RATING	additional notes
ACADEMIC ACHIEVEMENT: Collects and uses data to track and monitor student progress to evaluate academic achievement and make appropriate instructional shifts and/or differentiate instruction.	✓	The program utilizes an internal monitoring tool to track student academic progress. Staff meet weekly to discuss students who are off-track in order to develop classroom-based interventions.
POST-SECONDARY READINESS: Collects and uses data to track and monitor student post-secondary readiness.	✓	The program's Post-Secondary Coordinator tracks student completion of bridging activities and individualized postsecondary supports provided (e.g., SAT, FAFSA, college/employment applications).
ACADEMIC PERFORMANCE BARRIERS: Collects and uses data to track and monitor school climate and identifies appropriate student supports to improve school climate outcomes.	✓	The program maintains an internal tracker of student grades, behavior, and attendance data. Program provided evidence of data walls and dashboards that analyze and track these data. The program's Engagement Team works together to provide supports to students based on data and related trends.

ONE BRIGHT RAY SIMPSON

DOMAIN I: ACADEMIC & SCHOOL CLIMATE ACCOUNTABILITY

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

effectively manage student behavior and employ positiv	e benavior ii	itervention & 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.	✓	Restorative justice practices evident from orientation throughout student's time in program. Disciplinary infractions lead to specific restorative practices per the program's handbook. Evidence of circles, restorative conferences and acts of reparation.
STUDENT INCENTIVES: Employs developmentally appropriate individual or group based incentives (e.g. admission to school events, recognition awards, tangible rewards).	✓	Evidence of weekly recognition and awards for attendance, behavior and academics. Evidence of Perfect Attendance awards, Passing All Classes awards, Fun Fridays (virtual games and gift cards mailed to students' homes), Zero Day virtual celebration for seniors, Student of the Month and Virtual Star of the Week recognitions.
TAILORED SOCIO-EMOTIONAL DEVELOPMENT PLANS: Develops and implements plan within 30 days of receiving student and adheres to personalized socio-emotional development plans.	✓	

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.	✓	No school safety drills conducted as a result of remote learning. The program completed the required Vital Information Packet and Emergency Operations Plans in Previstar.
CODE of CONDUCT: Adopts and provides to students a code of conduct aligned to School District's Code of Conduct.	*	No code of conduct was available for review. Program implements Cardinal Rules and a Behavior Continuum, but no consequences for specific behaviors. However, no evidence that the program applies consequences that are harsher than School District Code of Conduct consequences for student behavior.
TRUANCY and DISCIPLINE REPORTING: Accurate and timely reporting of attendance, truancy and disciplinary incidents as required by contract. Develops Student Attendance Improvement Plans and communicates with parents/guardians timely to prevent chronic absenteeism.	×	The program has detailed procedures in place to track student absences and engage with parents/guardians to develop SAIPs. However, there were significant errors with linking behavior incidents with suspension/attendance data in the SIS.

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 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.	√	No evidence that program-generated report cards persist, as was observed in previous walkthroughs. At the time of the walkthrough, the program was meeting all deadlines for student rostering and grade entry in the SIS.
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.	✓	Individual Graduation Plans reviewed detail student postsecondary goals and postsecondary bridging activities and milestones completed, such as college application submission, college acceptances, job applications, job attainment, Naviance task completion and SAT/ACT.

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, 6% of the contracted maximum number of students had an IEP.
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.	×	2 of 10 Special Education files reviewed had baseline measures and sufficient evidence of progress monitoring. 0 of 10 English Learner (EL) files reviewed had 2020 ACCESS scores.

ONE BRIGHT RAY SIMPSON

CONTRACT REQUIREMENTS	RATING	Additional notes
IEP IDENTIFICATION, EVALUATION & REVIEW: Identifies, evaluates, reviews and implements IEPs timely and with fidelity, in accordance with applicable laws.	✓	9 of 9 eligible Special Education files reviewed included the required digital hybrid learning plan and digital services tracker.
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.	*	17 of 18 IEPs were in compliance for December 1 Child Count (94.4% 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.	√	
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.	*	0 of 10 English Learner (EL) files reviewed had 2020 ACCESS scores. 20 of 20 enrollment files reviewed included a completed Home Language Survey.

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: Maintains an archive of all historical student academic and behavioral records.	✓	The program utilizes PowerSchool Student Information System to maintain current and historical student 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

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.	×	0 of 20 enrollment files reviewed included personally identifiable information. No signed FERPA release forms for students 18 years of age and older. The program is developing a process to ensure that FERPA forms are signed upon enrollment for students 18 years and older and for enrolled students upon their 18 th birthday.
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.	√	Parents/guardians receive direct access to student grades, attendance and behavior marks via the PowerSchool mobile or desktop application to monitor their student's progress. Evidence of phone calls to parents/guardians and home visit logs with detailed case notes.

DOMAIN 2:ORGANIZATIONAL COMPLIANCE

CATEGORY 3: PERSONNEL

STANDARD: BACKGROUND CHECKS, LICENSES & EDUCATOR CERTIFICATION – Evidence of contractor compliance with relevant contract, state and federal educator personnel 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.	✓	PA Criminal History Check: 1 of 1 new employee reviewed had a valid check on file. PA Child Abuse Clearance: 1 of 1 new employee reviewed had a valid clearance on file. FBI Background Check: 1 of 1 new employee reviewed had a valid check on file. Act 168 documentation: 1 of 1 new employee reviewed had documentation on file.
PROFESSIONAL CERTIFICATIONS: Provides PA certificated teachers in all core instructional areas.	×	No PA certified science teacher on staff.
PROFESSIONAL CERTIFICATIONS (ADMINISTRATOR): Provides at least one PA certificated administrator per site.	×	The program's principal was in the process of gaining their Admin I certification at the time of the walkthrough. The Admin I certification was approved by PDE and valid within 2 months of the walkthrough date.
STUDENT SUPPORT SERVICES STAFF: Provides sufficiently trained and certified/licensed professional staff for student support services including special education and ELs.	×	The program employs a range of student support staff including Social Workers and a Postsecondary Counselor. The Special Education teacher of record was not appropriately certified at the time of the walkthrough, but gained the appropriate expanded certification in Special Education 7-12 within three months of the walkthrough.

DOMAIN 2:ORGANIZATIONAL COMPLIANCE

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.	✓	
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: 1 of 1 new employee reviewed had a completion certificate on file. Act 126 Training: 1 of 1 new employee reviewed had a completion certificate on file.
ENGAGEMENT IN DISTRICT PROFESSIONAL DEVELOPMENT AND CONTRACTOR MEETINGS: Ensures that teachers and administrators engage in School District professional development opportunities and monthly contractor meetings.	✓	

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.	✓	The program engages numerous community organizations and non-profits, including but not limited to YEAR UP, Congreso, Harcum College and City of Phila. DBHIDS.
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.	×	0.7% of parents completed the 2019-2020 District-wide Parent Survey (minimum of 10% participation required).

DOMAIN 2:ORGANIZATIONAL COMPLIANCE

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

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.		DOMAIN 2: ORGANIZATIONAL COMPLIANCE	

CONTRACT REQUIREMENTS	RATING	additional notes
RESIDENCY REQUIREMENT: 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.	*	No evidence to suggest that the program enrolls students from other LEAs, however, only 13 of 20 student enrollment files reviewed had valid 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.	✓	

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.	√	
FACILITY MAINTENANCE: For privately-owned facilities, contractor maintains regular upkeep of facility including structure, student		Not able to be observed due to virtual walkthrough.
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	Not applicable	
timely.		

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.	✓	
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.	Not applicable	Transportation services suspended due to remote learning.

CONTRACT REQUIREMENTS	RATING	ADDITIONAL NOTES
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.	✓	

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 Clearance absolving any city tax liabilities.	✓	
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.	×	The program's Additional Insured Endorsement documentation was not available at the time of the walkthrough. No evidence of the required sexual abuse/molestation coverage and Professional Liability/Educators Legal Liability coverage at the time of the walkthrough. The required Additional Insured documentation and sexual abuse/molestation coverage and Professional Liability/Educators Legal Liability coverage were received after the walkthrough.

ONE BRIGHT RAY SIMPSON

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.	✓	No concerns highlighted in an independent audit of the organizations FY 2020 financial statements.
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.	✓	