

Operational Walkthrough Report

SY 2022-2023

One Bright Ray – Mansion

Provider: International Education and Community Initiatives d/b/a One Bright Ray, Inc. Program Type: Accelerated Grades 9-12 3133 Ridge Avenue, Philadelphia, PA 19132 | (215) 999-3110 <u>https://www.onebrightraycommunity.org</u>

Operational Walkthrough Overview

Operational Walkthroughs for all Opportunity Network contract programs focused on the systems and structures required to deliver equitable, high quality instruction and supportive environments for all 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 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 informing 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.

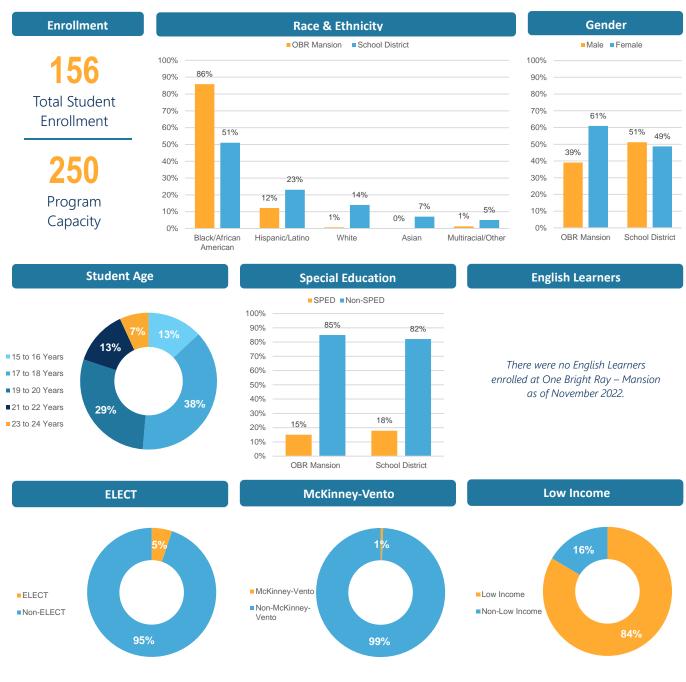
A 🗸 indicates the program met the contract requirement. A 🛎 indicates the program did not meet the contract requirement. The basis for the rating is provided in the Additional Notes section for each standard.

Walkthrough Date:	November 10, 2022
Contract Term:	FY2023 – FY2027

General Information			
Program Mission:	aged and under-credited studen school diploma. We challenge ea	its in search of a positive school e	a quality education to urban, over- experience while earning their high nal and academic potential through ps.
Program Leadership:	Marcus A Delgado <i>Chief Executive Officer</i> Stefani Finnin <i>Principal</i>	Anna Duvivier Chief Operating Officer Kellen Massie Dean of Students	Joycet Velasquez Chief Academic Officer
Walkthrough Review Team:	DawnLynne Kacer Executive Director, Opportunity Network	Majeedah Scott Director, Multiple Pathways to Graduation	Marcus De Vose Assistant Director, Transition Services
	Seth Morones Strategy Analyst II, Opportunity Network	Brett Botwinis-Zeba Case Manager, Specialized Services	Jessica Morris Attendance Coach, Attendance and Truancy.
	John Hale Prevention and Intervention Liaison, Prevention and Intervention		

Program Demographics

The School District of Philadelphia's official demographic information is reported on October 1st of each academic year. To more closely align with the student composition of each program on the date of the walkthrough, demographic data for Opportunity Network programs is reported here as of November 2022.



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 self-sufficient. The McKinney-Vento Homeless Education Assistance Act guarantees a free and appropriate public education for all children and youth experiencing homelessness. Low income status is calculated by the number of students directly certified as receiving public assistance.

Performance Summary- All Domains

The tables below summarize the number of standards by category which met expectations consistent with contract requirements during the 2022-2023 Operational Walkthrough. Information regarding how standards in each domain are measured can be found in the Performance Framework for Opportunity Network contract programs.

Domain 1: Academic & School Climate Accountability

Category	Requirements Met
Academic Quality (Page 4)	4 / 5
School Climate & Culture Quality (Page 5)	11 / 12
Domain Total	15 / 17

Domain 2: Organizational Compliance

Category	Requirements Met
Student Academic Support, Progress Monitoring & Reporting (Page 9)	8 / 9
Record Keeping & Communication (Page 11)	5 / 5
Personnel (Page 12)	6 / 7
Governance & Enrollment (Page 13)	2 / 5
Domain Total	21 / 26

Domain 3: Accommodative & Financial Compliance

Category	Requirements Met
Accommodative Quality (Page 15)	5 / 5
Financial Compliance (Page 16)	4 / 4
Domain Total	9 / 9

Domain 1: Academic & School Climate Quality

Category 1: Academic Quality

Standard 1: Curricular Quality

The measurement of the quality and evolution of instructional frameworks, practices and materials offered by the contractor and adherence to offering and effectively using appropriate student assessments.

Contract Requirement	Rating	Review	Recommendations
Instructional Frameworks Designs program-specific instructional materials or purchased PA state-aligned materials.	~	All courses reviewed are in alignment with contract and SDP expectations in the math and ELA frameworks, CLIF, and Science of Reading. Additionally, all courses reviewed were aligned with curriculum resources, accelerated learning and the project based model at OBR.	
Baseline Assessments Offers baseline (pre-test) assessments in reading and mathematics (e.g., STAR) within 10 days of enrollment for academic progress monitoring.	×	Less than 80% of students have scores for the STAR pre-tests (39% in math; 39% in reading). Each OBR program administers the STAR assessment for math and reading and has developed a schedule for baseline testing, make-up testing, and staff training, which happen at the start of each of the three modules. Parents/families are appropriately communicated with via letters home, emails, and phone calls to make them aware of the assessment, explain what it is, how it is useful, and why the STAR assessment is important. Participation was notably higher, but still did not meet the minimum participation rate requirement, for students who were not chronically absent (i.e., students who have accrued 10 or more unexcused absences within a 45-day period) - 70% in math and 74% in reading.	The program should develop daily and weekly strategies to ensure all students take the STAR pre-test (e.g., maintain a tracker of test participation, monitored daily, and set aside time for students to take the test daily or weekly).

Standard 2: Effective Monitoring and Supports for Academic Barriers

The measurement of the contractor's systems and structures for identifying and removing academic barriers and ensuring processes exist to support school staff in delivering high quality, standards-aligned instruction.

Contract Requirement	Rating	Review	Recommendations
Social Emotional Learning Incorporates explicit Social-Emotional Learning (SEL) and development by which students can acquire and effectively apply the knowledge, attitudes, and skills necessary to understand and manage emotions, set and achieve positive goals, feel and show empathy for others, establish and maintain positive relationships, and make responsible decisions for lifelong success.	~	The program uses the Youth Thrive curriculum focused on developing youth resilience. SEL takes place during OBR Seminar classes. Students are rostered for OBR Seminar once per school year in order to develop the skills necessary to understand and manage emotions. OBR Seminar classes are sequential and students are rostered into each class based on their proximity to graduation. Staff receive writing prompts to use as warm-up activities at start of class aligned to program wide SEL development.	The program should specifically tie SEL skills to community building activities/prompts and/or provide other evidence of SEL skill building from student leadership activities, circles, or seminar.
Multi-Tiered System of Supports Identifies and supports struggling students through a well-designed and effectively implemented Multi-Tiered System of Supports (MTSS). The MTSS utilizes research-based interventions inclusive of academic, behavioral, and attendance supports. Tier 1 interventions are universal and incorporated into the core academic program and climate.	~	The program's MTSS tracker was updated with baseline data and recent progress monitoring data inclusive of academic, behavior and attendance for all students. Interventions were evident in the MTSS tracker along with comments and notes from individual staff members.	Use the MTSS tracker to document student progress with interventions and note any successes or continued barriers each student is facing for ease of monitoring and consideration of other interventions/tiers of support.
Teacher Planning Time/Professional Learning Cycles (PLCs) Sets aside at least 45 minutes weekly for teachers to collaborate and plan effective instruction and build their capacity to teach grade-level standards.	~	The program plans weekly Professional Learning Community (PLC) time to discuss topics to enhance program and professional practice such as literacy strategies, engagement strategies, restorative approaches, and classroom opening routines. Teachers work with OBR academic staff to incorporate learned strategies into the classroom and modify lesson plans accordingly, and meet regularly with them to receive feedback.	

Category 2: School Climate and Culture Quality

Standard 1: Positive and Welcoming School Environment

The measurement of the contractor's systems and structures to manage and support student behavior and maintain a healthy school climate.

Contract Requirement	Rating	Review	Recommendations
Positive Behavior Supports and Student Incentives Employs a system of positive supports inclusive of individual and/or group- based incentives.	~	Evidence of MTSS Tier I individual and group incentives based on weekly and monthly attendance and academic achievement. Incentives included: gift cards, student of the week recognitions, end of module trips, and recognition pins.	
Bullying Employs measures to combat both cyber and in-person bullying. Ensures incidents are reported and monitored according to School District policies.	~	The program follows the School District's bullying and harassment policy for reporting and investigating. Students receive Safe2Say training. Parents/guardians and students learn about bullying/cyberbullying expectations at new student orientation. Expectations are reinforced in the student handbook and via email communications to parents/guardians. At the time of the walkthrough, there were no instances of Office of Discipline Referrals made related to bullying.	
Restorative Justice Employs restorative justice practices (e.g., facilitated mediation, reflective writing, peer court/advising, etc.).	~	The program embeds restorative practices into school culture, including team/relationship building, self-awareness and reflection, goal setting, and self- regulation tools.	
Code of Conduct Code of Conduct is aligned to the <u>School</u> <u>District's Code of Conduct</u> for infractions and consequences. Evidence the program's discipline practices are aligned to the Code.	~	The program utilizes its own code of conduct grounded in progressive discipline and aligned to the SDP Code of Conduct. Program reported no ODRs school year to date, therefore no issues with alignment to SDP Code noted.	

Standard 2: Barriers to Student Success Supports, Monitoring and Reporting

Measurement of the contractor's systems and structures to identify, provide supports, report and monitor attendance and behavioral concerns and meet obligations to appropriate authorities.

Contract Requirement	Rating	Review	Recommendations
Reporting Attendance and Disciplinary Incidents in SIS Accurate and timely reporting of attendance and disciplinary incidents on a daily basis.	~	No known or outstanding issues. All incidents are reported timely and in the appropriate District systems. Teachers take attendance daily and code student absences in Infinite Campus. There were no incidents which required an Office Disciplinary Referral at the time of the walkthrough.	

Contract Requirement	Rating	Review	Recommendations
Attendance Barriers Addresses individual student attendance barriers and follows the <u>School District's</u> <u>Attendance and Truancy Protocols</u> (i.e., Notice of Third Illegal Absence, attendance improvement conferences, entry of SAIPs into the SIS, etc.)	×	No evidence of timely implementation of the School District's Truancy Protocol for students with 3+ absences. Notices of Third Illegal Absence, School Attendance Improvement Conferences (SAICs) and School Attendance Improvement Plans (SAIPs) were not completed as required for all eligible students. As of November 1, 2022, 82% of students were considered chronically absent (i.e., have accrued 10 or more unexcused absences within a 45-day period).	The Attendance Team should send a Notice of Third Illegal Absence immediately after the third unexcused absence is accrued for each student. Ensure the SAIC is scheduled by the 6th unexcused absence for each student and develop an individualized SAIP during the SAIC. Ensure progress monitoring is conducted every 30 days and documented in the SAIP.
Staff and Resources for Healthy School Climate Provides staff and resources needed for safe schools and attendance reporting, as well as an optimal learning environment.	✓	The program employs a dean, counselors, attendance coordinator and safety staff. The program exceeds contractual expectations for the 1:100 support staff to student ratio.	
Clinical Questionnaire Administers a clinical questionnaire to each student to assess their personal needs which could become barriers to school success.	√	Evidence of the use of a student clinical questionnaire to assess student needs, possible barriers to attendance, emotional, stress, and mental health self-awareness and status are reviewed via the questionnaire.	

Standard 3: Student, Family, and Community Engagement

Measurement of the contractor's efforts to engage students, families, and community-based organizations to improve academic achievement, support overall student growth and extracurricular opportunities, and enhance school climate and culture.

Contract Requirement	Rating	Review	Recommendations
School Community Building Incorporates community building at least weekly to provide a platform for all students to establish community, build relationships, learn to resolve issues, take ownership of their actions, and engage positively with the school environment with empathy and compassion. Community building practices may include: morning meetings, group advisory, restorative circles, harm and healing circles, townhouses, etc.	V	Evidence of weekly community building lessons during advisory classes. Community building topics were outlined for the year and include School District monthly counseling topics, bullying prevention, self-regulation skills, healthy relationships and discussions related to community concerns/neighborhood issues.	

Contract Requirement	Rating	Review	Recommendations
Family Engagement Embraces a culture which supports parent/guardian engagement in the life of the program, including consultation on governance matters and opportunities to review student learning and progress. The contractor must have a plan for implementing and sustaining family engagement programs. Family engagement practices may include: parent conferences, advisory boards, community workshops, resource banks, family nights, and the engagement of students' own children and siblings.	~	The program maintains a running log of calls/communications made for each enrolled student showing the reason and outcome of the communication with parents/guardians. Notes indicate both positive and concern calls are made to parents/guardians for attendance, grades, and behavior. Parents/guardians attend new student orientation and learn firsthand about program expectations, supports, and leadership. The program's advisory council was formed to engage parents/guardians in the life of the program.	In addition to the outreach strategies used by the program, consider trainings and workshops targeted to families specifically, such as FACE and FACT workshops, resources rooms, trainings offered by community partners (e.g., financial management, healthy nutrition, etc.)
Student Voice and Leadership Offers equitable and recurring opportunities for students to contribute to the life of the program, including choice within the curriculum, inclusion on program governance, and student-led leadership groups.	✓	Evidence of the program's efforts to engage all students in program governance (students are encouraged to make anonymous suggestions using a drop box). All students are welcome to join the program's advisory council; three students were members of the newly formed council at the time of the walkthrough.	
Community Partnerships Engages community and non-profit agencies to provide non-academic services and support.	✓	The program partners with a number of community and non-profit agencies to provide postsecondary exploration and social-emotional/personal supports for students. Partnerships include but are not limited to: the Philadelphia Fire Department, Network of Neighbors, Resources for Human Development, Stepping Stones Scholars, and gun violence prevention organizations.	Create memoranda of understanding (MOUs) or partnership agreements with community organizations to identify partnership goals, services, operational guidelines, timelines, expectations, financial obligations, etc. Develop additional partnerships to support student non-academic needs (e.g., trauma counseling groups).

Domain 2: Organizational Compliance

Category 1: Student Academic Support, Progress Monitoring, and Reporting

Standard 1: Progress Toward Projected Graduation and Postsecondary Planning

Measurement of the systems and structures in place to support student with readiness for graduation and post-secondary planning aligned to student level interests.

Contract Requirement	Rating	Review	Recommendations
Postsecondary Plans Creates a written postsecondary plan for each student including timeline for completion of required activities related to the Future Ready PA Career Portfolio.	~	Evidence of individual student postsecondary plans include: credit map, expected graduation date, postsecondary goals, checklist of exploration opportunities, activities required to achieve postsecondary goals (e.g., FAFSA), completion of required ESSA/PA Future Ready activities (Naviance), strategies to manage personal barriers to Success, and Career Interest Inventories. Postsecondary counselors meet with students to review progress on Naviance and graduation tasks and update graduation plans accordingly.	
Program-wide Career Readiness Activities Establishes documented partnerships with employers and institutions of higher education, program-wide postsecondary efforts for exploration, preparation, and matriculation or employment, and completion of required activities related to the Future Ready PA Career Portfolio/ ESSA Accountability Standards.	~	Evidence of a program-wide career readiness plan, including OBR Seminar courses, partnerships with postsecondary institutions, such as Community College of Philadelphia, Temple University, and Harcum College. The program tracks internship opportunities and monitors the progress of students placed into internships.	
Graduation Plans Develops detailed, student-specific graduation plans to meet Act 158 requirements (and Act 1 if eligible) including the identification of each student's selected graduation pathway and pathway components, and/or any waivers for each student. Employs practices to review plans with students at least once per term and documents progress. Ensures the Academic Plan for Act 158 in the SIS is current and all required documentation is uploaded in a timely manner.	•	Academic Plans in SIS for graduating seniors were in progress at the time of the walkthrough. The program offers several certifications to all interested students at no cost to the student toward completion of the evidence-based graduation pathway. The program's transition coordinator works to ensure individual students have the opportunity to earn other industry-based credentials and workplace experiences also toward the completion of the evidence-based graduation pathway. Parents are notified of Act 158 requirements through letters home and phone calls.	

Standard 2: Diverse Learner Population

Quality measurement of the systems and structures in place to accurately and timely report student progress for diverse learners, including special education students and English Learners (ELs).

Contract Requirement	Rating	Review	Recommendations
Enrollment of Special Education Students Enrolls special education population no less than 15% and no greater than 20% of the program capacity.	~	SPED enrollment for November 2022 was 15% of the total enrollment.	
Baseline Measures and Progress Monitoring 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.	~	10 of 10 IEP files reviewed had sufficient evidence of progress monitoring, along with baseline goals and descriptive narratives detailing student performance and monitoring efforts. Progress Reports were aligned to OBR's calendar of trimesters. There were no EL students enrolled at the program at the time of the walkthrough.	
IEP Identification, Implementation, Evaluation & Review Identifies, evaluates, reviews and implements IEPs timely and with fidelity, in accordance with applicable laws. Includes Transition Services in IEPs for students 14 years or older. Cooperates with the School District to provide IEP services with fidelity.	×	 10 of 10 IEP files reviewed captured student attendance. 10 of 10 IEP files reviewed provided evidence of a transition plan. 1 of 10 IEP files reviewed had sufficient evidence of transition planning/transition data (e.g., O'Net results) in the present levels section. 	The program should ensure a transition assessment (i.e O'Net) is administered to each student, as well as Naviance, and include the results in the IEP and then align goals, activities and services to the results. Also, ensure each student has at least two (2) transition goals/activities identified for each domain.
Annual IEP Updates Ensures IEPs are updated on an annual basis according to federal and state directives including December 1 Child Count compliance.	~	The program was at 100% compliance for December 1 Child Count.	
IEP Meetings Assumes lead role for scheduling, convening, and completion of IEP meetings as well as all special education related paperwork. Documents participation of all required IEP team members. Collaborates with the School District as necessary and appropriate to support students.	~	All IEPs included in the Confidential File included an IEP invitation. However, some of these invites were generated the day prior to the scheduled IEP meeting. IEPs also included current input from team members. Program consistently obtained all signatures of IEP meeting participants and on IEPs/NOREPs.	Send out the IEP invite at least 10 days prior to the IEP meeting to provide the parent/guardian ample time to make arrangements to attend the meeting. A minimum of three attempts/invites to parent/guardian are to be made so they can participate in the IEP team meeting.

Contract Requirement	Rating	Review	Recommendations
EL Identification, Implementation, 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.	✓	There were no EL students enrolled at the program at the time of the walkthrough. The program did provide an overview of EL services they would provide upon enrollment of EL student(s). Home Language Surveys were included and complete in 20 of 20 enrollment files reviewed.	

Category 2: Record Keeping and Communication

Standard 1: Obligatory Communications to the School District

Measurement of the systems and structures in place to adhere to timely recordkeeping obligations to the School District.

Contract Requirement	Rating	Review	Recommendations
Student Information System Upload Uses the School District's current student information systems to access and upload all student enrollment, academic, behavioral, and attendance records in real time.	✓	No issues at the time of the walkthrough related to timely SIS entries.	
Archive of Historical Information Maintains an archive of all historical student academic and behavioral records.	✓	No issues at the time of the walkthrough related to archival of historical student information.	
Emergency Preparedness Conducts and reports school safety drills timely using the required School District system. Develops emergency preparedness plans in Previstar by the annual deadline and updates plans timely and as needed throughout the school year.	✓	Previstar documentation shows the program is up to date with all required safety drills. Vital Information Plan (VIP) and Emergency Operation Plan (EOP) were submitted by the August deadline.	

Standard 2: Student Performance Reporting and Recordkeeping

Measurement of the systems and structures in place to ensure reporting and appropriate recordkeeping of student academic performance in alignment with School District's obligations to parents and/or legal guardians.

Contract Requirement	Rating	Review	Recommendations
Student Progress Reporting Provides timely reporting of student academic progress on an interim basis to students, parents and/or legal guardians. For end of term report card, utilizes the approved School District report in coursework attempted/ completed, level of achievement, and attendance.	✓	No issues at the time of the walkthrough related to reporting progress to parents/guardians. The program maintains internal progress reports which are used to work with students, but all formal progress and credit reports, and report cards, are produced solely from the SIS.	Program should communicate to parents/guardians in writing any internal progress, credits, and grades reports are unofficial, and only reports produced from the School District's SIS platform are considered official.
Official Certified Information Ensures all official grades, credits, transcripts and diplomas are solely produced by the School District and/or Infinite Campus.	~	No issues at the time of the walkthrough related to official academic information solely produced by the School District's SIS platform.	

Category 3: Personnel

Standard 1: Background Checks, Licenses, and Educator Certifications

Measurement of the contractor's compliance with relevant local, state, and federal educator personnel requirements.

Contract Requirement	Rating	Review	Recommendations
Teacher Certifications Provides Pennsylvania certified teachers in all core instructional areas.	×	2 of 4 core teachers were appropriately certified in their respective content areas. Teachers of record for ELA and math did not have current valid PA certifications (cert for math teacher was inactive).	Program should support teachers with applying for emergency certification and then with completing continuing education needed to obtain formal certification through partnerships with local higher education institutions.
Administrator Certification Provides at least one Pennsylvania certified administrator per site.	\checkmark	The program has a principal on staff with a valid Administrative K-12 PA certification.	
Diverse Learner Services Staff Provides sufficiently trained and certified/ licensed professional staff for diverse learner services, including special education and ELs.	\checkmark	The program employs a PA certified ESOL teacher to support English Learners, and a PA certified SPED teacher to support SPED students.	

Contract Requirement	Rating	Review	Recommendations
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.	~	 FBI Background Check: 15 of 15 employees reviewed had a valid check on file. PA Child Abuse Clearance: 15 of 15 employees reviewed had a valid clearance on file. PA Criminal History Check: 15 of 15 employees reviewed had a valid check on file. Act 168 documentation: 14 of 14 eligible employees reviewed had documentation on file, however in six instances the documentation was incomplete or not completed timely. 	Act 168 is a pre-hire clearance. Ensure all new hires complete the attestation and one form for each relevant prior employer and for any current employer(s) prior to date of hire. Program to make and document three separate attempts to contact employers receiving Act 168 form and keep this documentation in employee files.

Standard 2: Personnel Ratio and Professional Development

The measurement of the systems and structures in place for the contractor to adhere to the contractual personnel ratios and required training and professional development offerings.

Contract Requirement	Rating	Review	Recommendations
Personnel Ratios Provides staffing to meet contractual student to teacher ratios and ensures student to support staff ratio is within contractual limits.	~	The program is in compliance with the contractually required 1:26 (program is currently 1:25) teacher to student ratio and 1:100 (program is currently 1:75) support staff to student ratio.	
Obligatory Trainings Provides all employees with Act 71, Act 126, and other obligatory PA Department of Education professional trainings and monitors timely completion and updates as required.	~	Act 71 Training: 15 of 15 employees reviewed had a completion certificate on file with evidence of completing the required 4 hours every 5 years. Act 126 Training: 15 of 15 employees reviewed had a completion certificate on file for the required 3- hour training.	Recommend the program offer all employees the Act 71 4 hour course instead of the 1 hour course so they can satisfy this requirement once every five (5) years instead of annually.
District Professional Development and Contractor Meetings Ensures teachers and administrators engage in School District professional development opportunities (required and optional) and monthly contractor meetings.	~	Program-based staff and OBR leadership regularly engage in Opportunity Network meetings (e.g., monthly contractors meetings and network trainings) and School District required meetings and trainings (e.g., equity lead meetings, SpeCM, active shooter training, etc.).	

Category 4: Governance and Enrollment

Standard 1: Program Governance

Measurement of the contractor's structures and protocols in place to adhere to contractual governance requirements.

Contract Requirement	Rating	Review	Recommendations
Program Advisory Council Establishes a formal program advisory council inclusive of community members, parents, students, and staff. Advisory councils must meet minimally six times per school year.	✓	Program provided an Advisory Council meeting agenda and meeting schedule for the school year. Meeting includes students, and the initial meeting is scheduled for 11/16 and there are (6) meetings scheduled so far, for the 2022-23 School Year.	
Equity The program's Equity Lead engages in School District monthly meetings. The contractor operates the program in a manner which advances equity in alignment with the <u>School District's</u> <u>diversity, equity, and inclusion practices,</u> <u>policies, and equity definition</u> .	×	Equity principles are adhered to through various student-facing policies, including uniform vouchers, trainings, restorative approaches, diverse staff, and community partnerships. These policies exist to remove barriers to success for historically marginalized students. OBR-network leadership participates in the District's Office of DEI trainings. No Equity Lead was identified at the time of the walkthrough due to leadership transition.	To move into compliance, the program must designate an Equity Lead to support and uplift equity work at the school and participate in monthly equity meetings with the School District.

Standard 2: Student Enrollment

Evidence of the contractor's structures and practices in place to adhere to contractual enrollment protocols.

Contract Requirement	Rating	Review	Recommendations
FERPA Complies with the Family Educational Rights and Privacy Act (FERPA) and designates a single point of contact for FERPA information.	×	2 of 17 enrollment files for students 18 years of age and older had signed FERPA release forms signed by the adult student. For the 3 files in which student was a minor at time of enrollment, there was no parent/guardian FERPA rights notice.	Have the enrollment administrator maintain a tracker of students' 18th birthdays to maintain consent of release of information to parents/guardians. Although an electronic FERPA "acknowledgement" is included with the online application, have student/parent/guardian sign and date a written FERPA rights form for inclusion in the enrollment file.

Contract Requirement	Rating	Review	Recommendations
Student Enrollment Records Secures personally identifiable information and does not request or require prohibited information at time of enrollment (e.g., SSNs). Collects proof of Philadelphia residency and proof of age at the time of enrollment. Requires completion of an enrollment application inclusive of home language survey and parent registration statement. Collects and maintains immunization records.	×	 20 of 20 enrollment files reviewed contained proof of age. 18 of 20 enrollment files reviewed contained proof of address. 15 of 18 files matched addresses in the SIS. 20 of 20 enrollment files reviewed contained immunization records. However, for one of these students, immunizations were not compliant at time of enrollment and student was not logged on immunization compliance tracker. 0 of 20 enrollment files reviewed did not contain prohibited information (e.g., Student Health Information forms; Wellness Check-in forms, Student Interview forms with confidential student information). 	The program should remove protected information (e.g., McKinney-Vento/homeless status, pregnant/parenting status) from enrollment files and instead maintain these records in a separate, secure counselor folder. Ensure all students present immunization records noting compliance or exemption forms within five (5) days of enrollment. All engagement with student/parent/guardian for immunization compliance is to be documented on a log.
Re-Engagement Center Referrals Contractor has reserved 50% of seats for School District's Re-Engagement Center (REC) and/or partners with the REC to receive referrals.	✓	The program seeks consultation for enrollment eligibility and works closely with the Re- Engagement Center to accept eligible referred students. Of 20 files reviewed, 2 students did not meet eligibility criteria for enrollment (students had >15 credits at time of enrollment) and no SDP approval was noted.	Identify credits earned to date at time of intake/interview of students and obtain written SDP approval for any student with quality credits in excess of credits allowed for each program type prior to enrollment of student.

Domain 3: Accommodative & Financial Compliance

Category 1: Accommodative Quality

Standard 1: Facilities

Evidence the contractor complies with established facility requirements.

Contract Requirement	Rating	Review	Recommendations
Federal, State, & Local Facility Regulations Complies with all federal and state regulations regarding access to individuals with (physical or otherwise) disabilities.		The program is housed in a School District facility.	
The program is housed in a non- sectarian facility.			
If in School District facility, provides ready access and cooperates with School District for required inspections.	\checkmark		
If in a privately-owned facility, contractor is compliant with any local requirements for facility condition including lead and water testing as well as electrical and fire safety inspections.			
Also if in a privately-owned facility, program secures licensed contractor for required AHERA inspections and provides report to the School District.			
Facility Maintenance For privately-owned facilities, contractor maintains regular upkeep of facility including structure, student and staff related spaces as well as outside grounds.	<i>_</i>	No issues with the program maintaining the facility or managing maintenance issues timely.	
For School District-owned facilities, contactor fulfills the obligations of their lease agreement regarding maintenance and reports maintenance issues timely and does not make any unapproved alterations.	Ť		

Standard 2: School Calendar, Uniforms, and Transportation

Evidence the contractor complies with the minimum number of instructional days required by the contract and makes the program accessible to all eligible students.

Contract Requirement	Rating	Review	Recommendations
Academic Calendar Maintains an academic calendar at least equal in days of operation to the <u>School</u> <u>District's calendar</u> . Notifies School District timely of any changes to or deviations from submitted calendar.	~	The program utilizes a school year calendar different from the School District's academic calendar. The program operates on a year-round calendar with 12-week modules for a total of 201 instructional days.	
Transportation Management Complies with the School District's requirements to appropriately manage transportation services for students. TARs are entered timely and transpasses are activated prior to expiration to ensure transportation access for all eligible students.	~	No known issues with managing transportation services for students.	
Dress Code and Uniforms Establishes an equitable dress code for students inclusive of expectations regarding school uniform. If required, provides uniforms to students upon request due to financial need and/or youth experiencing homelessness. Does not have policies or practices which create barriers to participation in	✓	Program shared their uniform policy and how adjustments made this year loosen the policy by allowing flexibility regarding types of pants and shoes students are allowed to wear. This change to policy was done in an effort to assist in increasing attendance. All students receive a uniform shirt at the start of the program; loaner uniforms are also available to students. Uniform policy is listed in the Code of Conduct.	
learning based on dress code or uniform. Dress code is gender neutral.			

Category 2: Financial Compliance

Standard 1: Procurement of Operating Certificates

Evidence the contractor complies with all relevant operating licenses, certificates, and insurance requirements.

Contract Requirement	Rating	Review	Recommendations
Tax Liabilities Provides the School District both prior to, and throughout operation with a Certificate of Tax Clearance absolving any city tax liabilities.	~	The program had a valid Certificate of Tax Clearance through 11/11/2022 on the date of the walkthrough.	

Contract Requirement	Rating	Review	Recommendations
Proof of Insurance Provides a Proof of Insurance prior to, and throughout operation 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.	✓	At the time of the walkthrough, the program's insurance documentation was current and included the contractually required types and levels of insurance, however, an expert review will be conducted by the Office of Risk Management.	

Standard 2: Financial Management and Reporting

Evidence of the contractor's financial viability and adherence to standards of financial management including monitoring and reporting of revenues and expenses, and invoicing to the School District.

Contract Requirement	Rating	Review	Recommendations
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.	✓	FY2023 budget was submitted for approval by the School District in accordance with the start of a new contract term. Independent auditor's management letter for FY2022 confirms maintenance of finances in alignment with generally acceptable accounting principles.	
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.	~	No current issues with timely and accurate submission of monthly invoices.	