

59 Please also discuss the planning and implementation of the Special Education Audit Trigger Policy.

- **Has this policy entered full effect?**
- **Please list all charter schools for which PCSB conducted special education audits in the last two school years, including what flag triggered the audit and what outcome resulted.**

The Special Education Audit Trigger Policy has been in effect and utilized since May 2013. Audits were initiated or conducted for schools when the following trends occurred:

- Out of school suspension rates for students with disabilities
- Parental complaints due to IEP timeliness concerns
- Underrepresentation of Level 3 and 4 students

Schools selected for these audits were considered outliers relative to other schools' data. For the out of school suspension rates in FY 13, PCSB contacted the special education coordinator and administrative team of several campuses. None of the audits resulted in findings that the schools had violated any applicable laws or were discriminating against students with disabilities. Given that all schools were cleared of any wrongdoings, PCSB is respectfully withholding the names of these schools in order to avoid causing any unnecessary harm to the school. The suspension rates for students with disabilities, while inarguably high, were not found to be the result of discriminatory practices against these students.

The parental complaints with IEP timeliness and other concerns were in relation to BASIS DC PCS. PCSB conducted a two-day onsite audit reviewing files of all students with disabilities and 504 Plans, interviewing staff members, and observing classrooms. As a result of this audit, PCSB's Board members held a meeting with the executive staff members and entered into an agreement where the school must complete all steps set forth in their Action Plan by the end of the 2013-2014 school year. Since this meeting, PCSB has checked in with the progress of the school's Action Plan twice and has scheduled two more check-ins. Also, PCSB held a Board to Board meeting with BASIS' Board of Trustees and Executive Team. To date, the school has met all of its milestones and parental complaints have not continued this school year. No school was found to be an outlier in FY13 for the underrepresentation of Level 3 and 4 students. PCSB is just beginning to identify schools for FY14 audits, which will be conducted throughout the spring of 2014.