Comments on Proposed SB 163 Rules Received 3.10.10 – 3.30.10

	Commenter(s)	Comment	Department's Response
1.	Nancy White and Diane Caro, Co-Presidents, Colorado Association of School Libraries	Include a requirement, in section 11.05 (F), that school performance	Rules should be amended to include the following:
2.	Jennifer Wodlinger, Teacher Librarian, Redlands Middle School	reports include information about whether the school provides a	"11.05 (F) (16) school library programs, as defined by the Commissioner;"
3.	Megan McQuinn, Teacher Librarian, Farell B. Howell School	library/ library-media program.	
4.	Sue Eckhardt, Independent Consultant, UC Denver Senior Instructor, Higher Ed Rep CO Assn. Sch. Libraries		
5.	Charles Davis, Media Specialist-Haaff Elementary		
6.	Marylou Rogers, Media Specialist, Loveland High School		
7.	Jake Pettit, Thompson School District		
8.	Jill Frei, Dept Chair Library Media Services, Thompson School District		
9.	Deborah Johnston, Library/Media Specialist, Turner Middle School		
10.	Megan McGee, Literacy Teacher, Turner Middle School		
11.	Sharon Stevens, Library Media Specialist, Rock Canyon High School		
12.	Jeanie May, Media Specialist, Mountain View High School		
13.	Kris Bruntz, President KB Legacy Designs, Inc.		
14.	Cheryl Joseffy, Teacher-Librarian, Henry World School		
15.	Kathy Plunk, concerned parent		
16.	Tava Smathers, Library Coordinator, Telluride School District		
17.	Carolyn Mundt, Boulder Valley School District		
18.	Kay Fair, Cherry Creek School Board Member		
19.	Mindi C Van Zee		
20.	Carol Sehnert, Library Media Specialist, Douglas County		

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School District		
21. Jessica Babbs, Teacher Librarian, Ranch Creek Elem. School		
22. Jo Ann Patterson, District Library Media Coordinator, Douglas County School District		
23. Cristen Hardin, Library Media Specialist, Mountain Ridge Middle School		
24. Aspen Walker		
25. Melissa Leyte, Glacier Peak Teacher Librarian		
26. Debbie Livingston, Jefferson County School District		
27. Amy Tempel, Teacher Librarian, Rocky Heights Middle School		
28. JoAnn Perry, School Librarian, Cherry Creek High School		
29. Christy Ismirian, Teacher Librarian, Carmody Middle School		
30. Yvonne Miller, School Librarian, Sagewood Middle School		
31. Catherine Newman, Poudre School District		
32. Jane Schatz		
33. Marcie Haloin, Retired Teacher/Librarian		
34. Kelli Chynoweth, Teacher Librarian, Douglass Elementary		
35. Beth Ellen Colvin, Media Tech CNEL, St. Vrain School District		
36. Karyn Lynne, Morton Elementary Media		
37. Erika Arias, Teacher Librarian, Ryan Math & Science Focus School		
38. Tammy Langeberg, Teacher-Librarian, Warder Elem. School		
39. Nadine Abrahams Teacher Librarian, Westview Elem. School		
40. Molly Gibney, Teacher Librarian, Mountain View Elem. School		
41. Lindsay Nesbitt, Teacher, Ryan Elementary School		
42. Kristin MeKeown, Library Coordinator, Eaglecrest High School		
43. Diane Strevey, Hillcrest Elementary Librarian		

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44. Dinah Kress, Library Media Specialist, Prairie Hills Elem. School		
45. Judith M. Barnett		
46. Randy Sachter, Teacher-Librarian, Nederland Middle/Senior High School		
47. Angie Keating, Teacher Librarian, Skyview Elementary		
48. Laura Israelsen, Teacher Librarian, Hulstrom Options K-8		
 Dianna Fricke, Library Media Specialist, Challenger Middle School 		
 Linda J. Conway, District Information Literacy Specialist, Academy School District 20 		
 Carolyn Dickerson, IT Services Manager, Harrison School District #2 		
 Florence Malohifo'ou, Media Specialist, Platte Valley School District 		
53. Lisa Sobieniak, Media Specialist, Centennial Middle School		
54. Melonie Enstrom, Nucla Jr/Sr High School Library		
55. Kurt W. Helfrich, Adams 12		
56. Melanie Foslien		
57. Tom Pettit		
58. Hollis Jacob, Teacher Librarian, Overland High School		
59. Nancy Bolt		
60. Rita Stephenson, Teacher Librarian, Rocky Mountain Elementary		
61. Kim Meyer, Teacher-Librarian, West Jefferson Elementary		
62. Denise Cushing, Library Para/STR, Carson Elementary		
63. Eloise May		
64. John Shortridge, Library Media Specialist, Broomfield Heights		

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Middle School		
65. Bonnie Meyers, Media Clerk, Lyons Middle Senior High		
66. Jan Veteto, Library Systems Administrator, Colorado Springs School District		
67. Patty Donovan, Library Technology Educator, Wasson High School		
68. Charles Leckenby, Library Technicians/STR, Steele Elementary Library		
69. Jill May, Library Technology Educator, Doherty High School		
70. Robin Streeter, Para-librarian, Dos Rios Elementary School		
71. Toni Weller, Teacher-Librarian, Falcon Bluffs Middle School		
72. Carol Foreman		
73. Donna Miller, Teacher-Librarian, West Middle School		
74. Elizabeth Baxendale, Former School Librarian		
75. Barb Kidder, Teacher-Librarian, Fruita Middle School		
76. Phyllis Bailey, LTT Carver Elem. School		
77. Stacy Distel Nishioka, Denver Public School District		
78. Gwen Giddens, Director of Learning Resource Services, Colorado Springs School District 11		
79. Ronda Scroggins, Information Specialist, Library Media Center		
80. Valeria Howard		
81. Michelle S. Hansen, Para-Librarian, Pomona Elem. School		
82. Brian Reeves, Teacher-Librarian, Sangre de Cristo Jr/Sr High School		
83. Ronda Gettel, Media Specialist, Highland Park Elem.		
84. Kendall Miller, Creekside Elementary School		
85. Jennifer Harris, Librarian, Highlands Ranch High School		

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87. 88.	Beatrice Gerrish, Librarian, Monarch High School Carol Gutting, Media Specialist, Widefield School District Peggy Cummings, Library Media Specialist, Douglas County High School Patricia Lucero		
3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14.	Deb Morton, Teacher Librarian Tiffany Brown, Librarian/Instructional Coach, Prairie Winds Elem. School Lori Roberts, Library Media Specialist, Northridge High School Jane Ortega, Library/Technology Teacher, Bella Romero Elem. School Karen Zadkovic, Meeker Elem. School Diane Normandin, Library Media Specialist, Ann K. Heiman Elem. School Linda Sipes, Librarian, Greeley Central High School Marsha Heineke, Media Specialist, Monfort Elem. School Valerie Black, Basalt Middle School Library Beckie Large-Swope, Teacher Librarian, Longs Peak Middle School Stephanie Brown Laura Kiahtipes, Poudre School District Kathy Plath, Media Specialist, Columbian Elem. Nancy Bolt Toni Weller, Teacher-Librarian, Falcon Bluffs Middle School	Include certified school librarian positions in section 11.05 (E)	Statute requires that school performance reports include information about whether schools employ school librarians (section 22-11-504, C.R.S.). Draft rules already include this requirement.
1. 2. 3.	Laura Israelsen, Teacher Librarian, Adams 12 Di Morgan Jeanette Loos, Fleming Community Library Director	Do not cut the position of certified teacher librarian or cut school library programs.	State Board does not have rulemaking authority to do this. Local school districts make decisions regarding funding for

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		librarians and library programs.
Alexander Krausz, Poudre School District	SB 163 rules should recognize and set standards for school librarians.	State Board does not have rulemaking authority to do this.
 Linda Oustecky, President, Colorado Association of School Nurses Leah Wyckoff, CASN Director, National Association of School Nurses 	Amend 11.05 (G)(7) to read "How many hours does a registered school nurse who is licensed with the Department and the Colorado Department of Regulatory Agencies spend on your school in a average week and what is the assigned school nurse-to-student ratio?" Data is critical to the public that assumes a full-time registered nurse is present during the school day in every CO school, when often a nurse may only be available 1-02 days per week in each school.	CDE staff is concerned about adding reporting burden for districts and inability to verify this level of specificity.
Susan LaBonde, Professional School Nurse, WCSD 6	Amend 11.05 (G)(7) to read "How many hours does a registered school nurse who is licensed with the Department and the Colorado Department of Regulatory Agencies spend on your school in a average week"	See comment above.
Marianne Peoples, Health Services Coordinator, Cherry Creek Schools	Amend 11.05 (G)(7) to answer the following questions: • How many hours a week	See comment above.

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	is a registered nurse available on the school premises? How many hours a week is a registered nurse available for consultation off-site?	
	What percentage of the above registered nurses that evaluate students for related services are licensed by both CDE and DORA?	
	Leaving wording as is will not give you a clear picture of the services provided in a school.	
Scott Groginsky, Senior Policy and K-12 Initiatives Director, Colorado Children's Campaign	Amend 11.05 (G)(7) so that schools report the number of hours per week that the nurse is available. This would be more meaningful information than merely whether there is a nurse available, because nearly all schools would affirm the latter to be true. The number of hours per week is easily accessible information that can be obtained by a simple call or email from the school to the nurse.	See comment above.
Dolores SD RE4A	Amend 2.02(D)(1) to specifically refer to boys as a subgroup that will be used in measuring growth	Statute and rules already require data to be disaggregated according to student sex. (Please

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	and achievement gaps.	see definition of "Student Groups" at section 22-11-104, C.R.S.)
Dolores SD RE4A	Why are Districts that are Accredited or Accredited with Distinction being forced to follow a prescribed template for their improvement plans? This requirement is not in the rules, but has been communicated by CDE. Why take away the professional judgment and choice from districts that are doing well? There is no evidence that CDE's Unified Improvement Plan will increase student achievement, so why make districts that are doing a good job jump through more hoops?	While not a matter of rulemaking, purposes for a standardized unified plan include: • Ability of state to create a relational database that can be searched by educators; • Efficiencies in CDE review of plans for federal purposes; and • Efficiencies in posting plans to SchoolView and allowing greater public transparency.
Tina Jajdelski, Community Leadership Academcy, Adams County School District 14	Why is there such a difference in the expectations for an Institute charter school and a district charter school? There is no one other than the principal involved in the Institute plan process but district charter school plans require involvement of the principal and superintendent and local school boards are encouraged to approve. Charter school boards and the Institute board are not mentioned.	Rules should be amended as follows: "10.08 (B) If the State Board directs an Institute Charter School to adopt a School Performance Plan, the school principal shall adopt a School Performance Plan. THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE INSTITUTE ARE ENCOURAGED TO REVIEW AND APPROVE SUCH PLAN. THE INSTITUTE

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		ALSO IS ENCOURAGED TO CONSIDER IN ITS POLICIES WHETHER IT WOULD LIKE TO REQUIRE THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE SCHOOL PRINCIPAL TO SUBMIT THE PLAN TO THE INSTITUTE FOR APPROVAL." "10.09 (B) If the State Board directs an Institute Charter School to adopt a School Improvement Plan, the school principal shall adopt a School Improvement Plan. THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE INSTITUTE ARE ENCOURAGED TO REVIEW AND APPROVE SUCH PLAN. THE INSTITUTE ALSO IS ENCOURAGED TO CONSIDER IN ITS POLICIES WHETHER IT WOULD LIKE TO REQUIRE THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE SCHOOL PRINCIPAL TO SUBMIT THE PLAN TO THE INSTITUTE FOR APPROVAL."
Mark Payler, Fort Lupton School District	The system proposed remains punitive—the entire idea of "grading" or labeling districts and schools is not standards based.	

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Mark Payler, Fort Lupton School District	The school restructuring options—turning a school over to a different private or public entity, converting to a charter school or closing—are punitive. Are these the right solutions?	The school restructuring options are prescribed by statute.
Mark Payler, Fort Lupton School District	I am concerned about CDE's capacity to work with districts requirement to implement improvement plans. We may need substantially more vendors/partners to work with districts.	
Mark Payler, Fort Lupton School District	We seem to be focused on "bad" principals and teachers as the root cause of poor academic achievement, but social scientists have long recognize the importance of an individual's family's SES. We are making accountability more rigorous at a time when districts face more students in unfortunate financial circumstances/home conditions.	
Mark Payler, Fort Lupton School District	Another overall factor to consider is the overall rating of a district is mobility rate.	
Mark Payler, Fort Lupton School District	I continue to be concerned about where we are headed as a state in terms of local control.	

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Mark Payler, Fort Lupton School District	There are still a number of gray areas: • What are "root causes" of low performance? • How will the State Review Panel make decisions about readiness/capacity of a district?	These questions are matters for the Department to consider in implementing the rules and will be clarified during training.
 Ken DeLay, Executive Director, Colorado Association of School Boards Kathy Shannon, Director of Member Legal Resources and Policy Counsel, Colorado Association of School Boards 	Amend rules to require that school performance plans and school improvement plans for district public schools MUST be approved by the local school board.	Rules currently state, "the Local School Board is encouraged to review such plan and to consider in its local policies whether it would like to require the school principal and District superintendent or designee to submit the plan to the Local School Board for approval." Statute specifically states that principals are required to approve performance plans, but does not direct local school boards to approve these plans. The State Board does not appear to have rulemaking authority to require local boards to approve the plans. Local boards have the authority to develop their own policies for their schools and, if they choose, may require that schools submit plans

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		to them. It may be helpful to amend the rules to encourage local boards to "review AND APPROVE" school performance and improvement plans.
Ken DeLay, Executive Director, Colorado Association of School Boards Kathy Shannon, Director of Member Legal Resources and Policy Counsel, Colorado Association of School Boards	In section 5.01, strike the provision allowing CDE to determine accreditation categories for districts based on the district's compliance with the requirements of the district's accreditation contract, "including the quality of the accreditation process used by the local school board or Institute in accrediting its schools." This provision violates the CO constitution and C.R.S. 22-11-307 and goes beyond the scope of CDE's authority by evaluating the "quality" of the local board's accreditation process.	Rules should be amended as follows: "5.01At that time, the Department also shall consider each District's and Institute's compliance with the requirements specified in that District's or Institute's Accreditation contract, including the quality of the Accreditation process used by the Local School Board or Institute in accrediting its schools."
Ken DeLay, Executive Director, Colorado Association of School Boards Kathy Shannon, Director of Member Legal Resources and Policy Counsel, Colorado Association of School Boards	In section 5.05 (B), second line, strike "on the Performance Indicators" so the language reads "and the District or Institute targets, including evidence from third-party review of performance."	Rules should be amended to more closely mirror the language in statute, as follows: "5.05 (B) If the Department has assigned the District or Institute to an initial Accreditation category of Accredited with Priority Improvement Plan or Accredited with Turnaround Plan, valid and reliable data demonstrating the

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		progress the District or Institute has made in improving its performance and in MOVING CLOSER TO meeting the statewide targets on the Performance Indicators and the District's or Institute's targets-on the Performance Indicators, including evidence from a Department-approved third-party review of performance."
 Ken DeLay, Executive Director, Colorado Association of School Boards Kathy Shannon, Director of Member Legal Resources and Policy Counsel, Colorado Association of School Boards 	Sections 2.02 (C)(1)(b) and 2.02 (C)(3) are inconsistent with each other and with the local school board's authority to adopt content standards.	Rules should be amended as follows: "2.02 (C) (1) (b) the statewide student dropout rate, as defined by section 2.02 (C) (2) of these rules, and the statewide student graduation rate, as defined by section 2.02 (C) (3) of these rules. In evaluating the level of attainment on student dropout and graduation rates, the Commissioner, TO THE EXTENT PRACTICABLE, shall ensure that Districts, the Institute, and Public Schools ARE NOT PENALIZED FOR have incentives for reengaging students and ensuring that ALL students successfully GRADUATE achieve Colorado's academic standards upon

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		graduation; and" "2.02 (C)(3) In evaluating the level of attainment on student dropout and graduation rates, the Commissioner shall ensure that Districts, the Institute, and Public Schools have incentives for reengaging students and ensuring that students successfully achieve Colorado's academic standards upon graduation. Student graduation rates shall be based on the following calculations, or as otherwise required by the Elementary and Secondary Education Act of 1965:"
 Ken DeLay, Executive Director, Colorado Association of School Boards Kathy Shannon, Director of Member Legal Resources and Policy Counsel, Colorado Association of School Boards 	Revise section 3.07 as follows: "If, at the end of the 90 day period, the Department finds that the district or Institute is not substantially in compliance with the APPLICABLE statutory or regulatory requirements, meaning that the district or Institute has not taken the necessary measures to ensure that it shall meet all legal requirements BE IN SUBSTANTIAL COMPLIANCE as soon as practicable, the district or Institute may be subject to the	Rules should be amended as follows: "3.07 If, at the end of the ninety-day period, the Department finds that the District or Institute is not substantially in compliance with the APPLICABLE statutory or regulatory requirements, meaning that the district or Institute has not taken the necessary measures to ensure that it shall meet THE APPLICABLE all legal

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	interventions specified in 22-11-210 through 22-11-210, C.R.S."	requirements as soon as practicable, the district or Institute may be subject to the interventions specified in 22-11-210 through 22-11-210, C.R.S."
 Ken DeLay, Executive Director, Colorado Association of School Boards Kathy Shannon, Director of Member Legal Resources and Policy Counsel, Colorado Association of School Boards 	Reporting of concurrent enrollment course offering shouldn't be limited to those on the public school's campus. We worry that the language is too narrow—rural schools, for example, may offer only online courses as a concurrent enrollment option. Revise 11.05 as follows "concurrent enrollment courses THAT ARE MADE AVAILABLE BY THE PUBLIC SCHOOL."	Rules should be amended as follows: "11.05 (F)(12) for high schools, concurrent enrollment courses MADE AVAILABLE BY THE PUBLIC SCHOOL ONLINE OR offered on the public school's campus. A concurrent enrollment course shall be defined as any course that allows a student to simultaneously earn credit both by a local education provider and an institution of higher education;"
 Ken DeLay, Executive Director, Colorado Association of School Boards Kathy Shannon, Director of Member Legal Resources and Policy Counsel, Colorado Association of School Boards 	Schools in turnaround and priority improvement should have a right to appeal their placement in these categories, similar to a district's right to appeal.	The Department assigns accreditation categories to districts, but the State Board approves plan type assignment for schools. Districts in turnaround and priority improvement have an opportunity to provide additional evidence to the Department if they disagree with their preliminary category assignment, and then to make a

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		formal appeal to the State Board. For schools, local boards have an opportunity to provide additional evidence to the Department if they disagree with a school's preliminary plan type assignment, and then the State Board makes a final determination regarding the plan type, taking into account the Department's final recommendation and any conflicting recommendation provided by the district.
Colorado League of Charter Schools	The charter school governing board should approve school performance plans and improvement plans, rather than the school principal (10.08(A)(2))	The State Board does not have rulemaking authority in these areas. However, it may be helpful to amend the rules to include the following language (also above): "10.08 (B) If the State Board directs an Institute Charter School to adopt a School Performance Plan, the school principal shall adopt a School Performance Plan. THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE INSTITUTE ARE ENCOURAGED TO REVIEW AND APPROVE SUCH PLAN. THE INSTITUTE ALSO IS ENCOURAGED TO CONSIDER IN ITS POLICIES

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		WHETHER IT WOULD LIKE TO REQUIRE THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE SCHOOL PRINCIPAL TO SUBMIT THE PLAN TO THE INSTITUTE FOR APPROVAL." "10.09 (B) If the State Board directs an Institute Charter School to adopt a School Improvement Plan, the school principal shall adopt a School Improvement Plan. THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE INSTITUTE ARE ENCOURAGED TO REVIEW AND APPROVE SUCH PLAN. THE INSTITUTE ALSO IS ENCOURAGED TO CONSIDER IN ITS POLICIES WHETHER IT WOULD LIKE TO REQUIRE THE INSTITUTE CHARTER SCHOOL'S BOARD AND THE SCHOOL PRINCIPAL TO SUBMIT THE PLAN TO THE
		INSTITUTE FOR APPROVAL."
Colorado League of Charter Schools	The charter school governing board, rather than the local school board, should consider an adopted school performance plan in developing a budget (10.08 (A)(4) and (6))	The State Board also does not have rulemaking authority in these areas. However a number of the recommendations have merit and the Department will pursue

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	The charter school governing board, rather than the Institute, should determine the number of persons and selection method for a SAC (12.03 (B)) In small districts, charter schools should not have the DAC serving as their SAC, as it infringes on the structure and contractual relationship already established between charter school and authorizer (12.03 (G)(3)); The financial subcommittee for a charter school should report all	administrative remedies.
	findings to the charter school governing board. This information should be included in the charter school's budget and elsewhere, as needed (12.04 (A)(1)).	
	The SB 163 rules should address the requirement from HB 1048, requiring CDE to provide to each charter school in the state academic growth information for each student enrolled in the charter school, based on the CSAP assessment results for the preceding school years.	
CDE staff, Elaine Gantz Berman and Randy DeHoff	Revise section 11.05 (F) to align with the language from the state	Rules should be amended as

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	model content standards "Comprehensive Health Education and Physical Education." If the rules list "courses" but the state intends to move away from "seat time", add a definition of "course" using language from Representative Merrifield's Arts Education bill.	follows: 11.05 (F) Course and Program Offerings. Information concerning whether the following courses and programs are available to students enrolled in the Public School and, to the extent they are available on the Public School's, District's or Institute's Web site, Internet links to descriptions of the following courses and programs. FOR PURPOSES OF THIS SECTION, A "COURSE" SHALL BE DEFINED AS INCLUDING, BUT NOT LIMITED TO, A TRADITIONAL CLASS, AN ON-LINE COURSE OF STUDY, AN INTERNSHIP, AN EXTERNSHIP, A MENTOR EXPERIENCE, OR AN INDEPENDENT STUDY COURSE THAT CULMINATES IN AN INTEGRATIVE OR SPECIALIZED PERFORMANCE, SHOWCASE, OR EXHIBITION: 11.05 (F) (1) visual art; 11.05 (F) (2) drama or theater;
		11.05 (F) (4) dance;

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		11.05(F)(5) COMPREHENSIVE HEALTH EDUCATION
		11.05 (F)(6) physical education;
CDE recommendation based on input from the Attorney General		1.27 "PARENT" SHALL MEAN A CHILD'S BIOLOGICAL PARENT, ADOPTIVE PARENT, OR LEGAL GUARDIAN OR ANOTHER ADULT PERSON RECOGNIZED BY THE CHILD'S SCHOOL AS THE CHILD'S PRIMARY CAREGIVER. 12.01 (G) IF A VACANCY ARISES ON A DISTRICT ACCOUNTABILITY COMMITTEE BECAUSE OF A MEMBER'S RESIGNATION OR DISQUALIFICATION OR FOR ANY OTHER REASON, THE REMAINING MEMBERS OF THE DISTRICT ACCOUNTABILITY COMMITTEE SHALL FILL THE VACANCY BY MAJORITY ACTION. 12.02 (A)(4) IF THE LOCAL SCHOOL BOARD RECEIVES A CHARTER SCHOOL RENEWAL APPLICATION, AND UPON

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Commenter(s)	Comment	REQUEST OF THE DISTRICT AND AT THE DISTRICT ACCOUNTABILITY COMMITTEE'S OPTION, TO REVIEW THE RENEWAL APPLICATION PRIOR TO CONSIDERATION BY THE LOCAL SCHOOL BOARD AS PROVIDED IN § 22-30.5-110 C. R.S.; and 12.02 (A) (6) AT ITS OPTION, TO MEET AT LEAST QUARTERLY TO DISCUSS WHETHER DISTRICT LEADERSHIP, PERSONNEL, AND INFRASTRUCTURE ARE ADVANCING OR IMPEDING IMPLEMENTATION OF THE DISTRICT'S PERFORMANCE, IMPROVEMENT, PRIORITY IMPROVEMENT, OR
		TURNAROUND PLAN, WHICHEVER IS APPLICABLE, OR OTHER PROGRESS
		PERTINENT TO THE DISTRICT'S ACCREDITATION CONTRACT.
		12.03 (A) (5) at least one person FROM THE COMMUNITY who is involved in the business in the

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		community within the school boundaries;