

**Independence Charter School
Board of Trustees Meeting Minutes
November 4, 2009 7:00 pm**

Board Members Present: Becky Baehr, Rona Buchalter, John Eagen, Eli Lesser, Rosina Miller Kristin Nocco, Pam Prell, Pedro Rodriguez, Elsie Stern

Board Members Absent: None

Others Present: Jurate Krokys, CEO; Ramzy Andrawos, Director of Operations; Jerry Santilli, Business Manager, Leonora Cravotta, Development Director; William Loskoch, Kelly Nelms and Michael Farrell, teachers; Robin Kohles, parent and building rep; Megan Steelman, Administrative Assistant; Cristina Veal, parent & PTA Liaison; Laura Weinbaum, parent.

I. Call to Order

President Rona called the meeting to order at 7:05pm. Rona reminded the Board members to keep their comments directed to motions on the table.

II. Approval of Minutes

Pedro moved and Becky seconded the approval of the October meeting minutes. The minutes were approved unanimously with one change: the charter school renewal is due on December 18th, not the 19th.

III. CEO Report

There were no questions about the CEO report. Becky thanked Jurate for including the section about how technology is being integrated into the classroom. Jurate added that ICS will most likely be administering the H1N1 nasal vaccine to eligible students during the week of November 16th.

IV. PTA Report

There were no questions about the PTA report.

V. Teachers' Report

Rona asked William how the teachers feel the student end of the day dismissal plan is working. William said they seem to feel this year's plan is safer than last year's. Jurate added that she first asked teachers for input before the plan was changed. She also said that as of tomorrow one additional staff person will be assigned to help with traffic control. Elsie recommended that there be better communication with parents, letting them know that ICS heard their concerns and the reasons for deciding on the final plan. Eli recommended that staff refrain from closing car doors for students as it could result in legal problems if a child is injured by the door. Several people noted that very young children are often not able to close the door safely by themselves.

VI. Development Report

There were no questions about the development report. Leonora reminded everyone about next Friday's ICS 365 event and urged them to purchase tickets. Rona noted that since this event does not raise a lot of money that we may need to look at whether it is a worthwhile event to continue. Leonora stated that is why we are trying something different this year by having a special guest speaker. She added that this event has become more of a "friendraiser" than a fundraiser. Jurate stated that it might continue to work as a networking event, as long as it doesn't cost ICS money to host it. Rona noted this event is a great chance for

Board members to contribute toward their “give-get” commitments buy buying several tickets and giving them to friends.

VII. Construction Update

There was no report this month.

VIII. Accreditation

There was no report this month.

IX. Committee Reports

A. Finance

There were no questions about the committee report. Rosina asked Jerry to review the financial reports. Jerry offered to prepare a brief written report for future meetings to help shorten the time this process takes at the Board meetings; Rona agreed that would be good to do.

Jerry explained that the financials are through the end of September, but that since that time we have finally received most of the student allotment funds that had been held during the state’s budget impasse. He also noted that while ICS has received two of the four promised federal stimulus fund allotments, he has just learned that we will not be getting one of the two remaining allotments and that we have not heard anything final about the last one. Jurate said we are hopeful that the last one will be coming and that it is only allowed to be used for technology. Jerry stated that although school had been urged to move forward on spending all the anticipated stimulus funds, ICS has only moved forward as funds have been received, which turned out to be a very good move.

Jerry stated that income and expenditures are on target and that he does not feel there are any areas of financial concern. He noted that there are some areas showing overspending on employee benefits, but that is because an average cost is used when budgeting for staff in various parts of the budget (i.e., one department may have more employees with family benefits, while another may have more single benefit employees); overall, however, we are within budget on employee benefit costs. Jerry noted that the Finance Committee has been discussing the possibility of paying off our loan debt to Citizens Alliance due to the cost of the interest on it. He stated ICS has the cash to pay it off. Rosina noted that this loan was taken at the start of the school to have renovations done in the 7th & Sansom space.

Jerry stated that the cash flow is now back to its normal level, since we’ve gotten most of the funds owed to the school. He stated that November and December are always the lowest point in the cash flow cycle. Rosina moved the disbursement motion; Becky seconded. It passed unanimously.

Rosina explained that in order to have all the documentation we want included in our charter renewal packet, the Board will need to call a Special Meeting before the next Board meeting in order to approve a financial policy manual and to have a meeting with our auditors to review the 2007-2008 and 2008-2009 audits. She proposed December 1st at 5:30p.m. for the meeting; the Board members agreed to that date and time. Rona reminded members to notify her if they need to call in to that meeting. Jerry explained that the financial policy manual will mostly be a compilation of policies that already exist, but this will bind them together in one easily accessible document. He said that he and Jurate will circulate a draft to Board members sometime within the next few days. Jerry will also circulate the audit reports as soon as he receives the final version for 2008-2009. Rona and

Rosina encouraged members to send questions to Jerry once these documents are circulated and to copy the whole Board as to not duplicate questions. Becky cautioned to make sure it's questions only and no deliberating, since that needs to be done publicly. Jerry also talked about the 990 form, which is required for all non-profits; the auditors complete the 990 form. Completed 990 forms can be found at guidestar.org; you need to sign up for an account to view the documents, but there is no fee involved. Leonora noted that she has saved ICS 990 forms on her computer, so she has them readily available to share.

Jerry noted that the food services program actually ended up running up a deficit of \$35,000 for 2008-2009, not \$25,000 as originally projected. He reviewed the September 2009 food services financial report, noting that revenue was about \$1,200 behind budget and expenses were about \$1,100 over. If the rest of the school year continues with those types of numbers, this year's deficit will be about \$25,000 which is what is budgeted. Plans are being made to try to increase revenue by boosting student and staff participation and looking at whether there is anything we may want to change about *a la carte* sales. Kristin asked whether ICS has talked to Linton about these concerns; Jurate said that we have. Kristin noted that this budget information will be very helpful when writing our RFP this year.

Jurate asked Rona if we could skip to "New Business" at this point in order for Jerry not to have to stay through the whole meeting; it was agreed to do that.

X. New Business

Rosina moved the Committee of 50,000 Students; Pedro seconded. Jurate circulated copies of the information she had e-mailed to the Board earlier and noted she needed to collect it after the meeting, since it was not yet ready for public distribution. She explained that a group of charter school administrators have meeting for several months to find ways to publicize all the positive things that are happening in charter schools, since the small group of charter schools that are having negative things happen seem to be getting lots of publicity and it is clear that the charter school movement cannot depend on the media to report on all the positive achievements. Jurate noted that situations such as Philadelphia School District capping charter school enrollment, even though that is not allowed under state charter school law, have pushed the need for high achieving charter schools to band together to speak in one voice about things like the enrollment cap issue, why funds at the state level are not always available to charter schools, etc. The group plans to put out a marketing RFP and needs to raise funds in order to do that. She stated that she's asking the Board to consider investing \$15,000 to this effort; \$10,000 would be held in escrow by the Greater Philadelphia Urban Affairs Council until all funds are collected. If the required number of schools don't sign on, then the money will be returned. This money would only be used for the advertising campaign. The other \$5,000 would be held by the PA Coalition for Charter Schools and would be used if any legal advocacy is deemed necessary in regard to Philadelphia's capping charter school enrollment. Jurate clarified that a funding commitment would probably need to be an annual occurrence. Jurate has been asked to be one of several charter school CEO's to sign a letter, asking other charter schools to commit to this effort. Jerry clarified that the only charter schools allowed to join this effort would be those who are working within several guiding principles---such as transparency of finances and student lotteries that are being finalized by the group. Pam asked how many schools have signed on so far; Jurate said she thinks about ten are currently signed on. Rosina asked where the funds would come from, since we have a zero-sum budget this year. Jerry stated that we'll be receiving more from

Title I than expected, so funds could be used from there. Eli asked whether it is legal to use those funds for lobbying. Jurate and Jerry explained that these funds will definitely not be used for lobbying. The \$10,000 would be used for public relations efforts regarding positive charter school achievements and the \$5,000 would be used if it becomes necessary to challenge the enrollment cap situation. Jurate added that it is fortunate that there is now a new charter school state plan being proposed, but that is far from something definite at this point and doesn't address the immediate situation such as schools like ours for whom the Philadelphia School District will only pay us for 732 students, even though we are educating several more students than that. Elsie asked who is deciding as to which charter schools are allowed to join this coalition and how are decisions about finances being made for the group. Jerry stated that the schools that have not been performing well have not been asked to join the group and would need to be in compliance with the groups guiding principles before being allowed to join. Pam noted that it sounds like an accreditation process, which most states have but Pennsylvania does not. Pam added that what she needs to hear as an ICS Board member is why this matters to ICS. Jurate stated that if we did this on our own, we'd be spending at least \$15,000 and only advertising the achievements of our school. She added that with such a long waiting list and being such a great school, she feels we need to take a proactive stand for the need for excellence in charter schools for more children. Eli asked what will happen if a member school doesn't keep up with the principles of the group and asked if ICS can wait and see how the group develops before committing to it. Jerry noted that if no one takes the risk, it will definitely fail. He added that the charter school movement in Philadelphia seems to be in distress and that is not happening in most other parts of the state. He said that there is a lot of stimulus money available for charter schools, but Philadelphia was not planning on offering any to charter schools. Rosina stated that she supports this resolution and feels coalition-building is necessary. She added that this seems to be a minor risk and low cost investment. Pedro asked how this will affect the PA Charter School Coalition. Jurate responded that the PA Coalition used to have a Philadelphia contingent, that is no longer there and that except for the problems that some cyber schools are having, most of the charter school problems in PA are happening in Philadelphia and there is not a lot of confidence in the PA Charter School Coalition. Jerry clarified that if there were to be a lawsuit, it would be made by the PA Coalition and that his understanding is that the full \$15,000 would be held by the Urban Affairs Council and the \$5,000 would not be released to the PA Coalition unless it was needed. Pedro stated he feels the Board needs to have the \$5,000 for legal action held until the Board gets to decide about whether or not to sign on to a lawsuit. Becky agreed, stating that we would need to ask our legal counsel for advice as to whether or not to participate. Rosina noted that as Jerry said, it would be the PA Coalition suing and our school would be helping fund it, not participating in it. Rona asked what Jerry's role is with the charter school CEO group. Jerry stated that he helped get the group together. Eli asked whether the Board has to decide tonight whether or not to join. Jurate reminded the Board that the term "legal action" is being deleted from the letter and urged the Board to move forward on a decision. Becky suggested a friendly amendment to remove the last four words of the resolution ("and potential legal action"). Eli stated he has reservations and would like the organization to take more shape before we join. He asked whether ICS would be the first to sign on and said he'd rather that ICS spend \$10,000 on our on marketing campaign. Jurate stated that she feels the group would be able to do more with that money for children in general. Pam asked whether anyone has looked into getting a grant. Jerry said that's unlikely at this point, since most funders would likely want schools signed on first before committing their funds. Jerry suggested modifying the resolution to say ICS would commit the funds once

a certain number of other schools commit. He also clarified that the money would automatically be returned to ICS from escrow if the required number of schools did not sign on. Rona asked if this would likely become an annual expense; Jurate said it probably would, but that the amount would likely decrease as additional schools join. Rona noted that the Board has agreed to only consider non-emergency allocations during budget planning time in order to look at the whole picture. Becky stated that we don't just operate in our own universe and that it would probably be beneficial to be a founding school in the group instead of joining at a later time. Jurate added that she feels this is an urgent situation. Elsie asked were ICS stands on being independent and whether we need the group as much as the group needs ICS. Rona suggested that we may want to first be certain that the other schools involved meet certain standards, such as transparency. Pedro stated that sometimes you need to take a leap of faith and that if we don't sign on now we may lose the opportunity to help shape the future of charter schools in Philadelphia. Pam stated that it is important to spell out the accountability aspects of the group members. Rona offered another friendly amendment:

Whereas, media outlets in Philadelphia have presented multiple negative articles about charter schools, and

Whereas the general public appears to have many misconceptions about charter schools and how they function, and

*Whereas there has been a move locally to cap the growth of charter schools, and
Whereas a Charter School Committee advocating for better public relations and advocacy of successful local charter schools has formed and is named the Charter School Committee of 50,000 students, now*

Be it resolved that the Independence Charter School Board of Trustees approves our participation in the Committee of 50,000 Students public relations efforts, including but not limited to signing on to committee-produced materials. Be it further resolved that the Board of Trustees of Independence Charter School also approves the disbursement of \$10,000 to the Greater Philadelphia Urban Affairs Coalition who will hold the money in escrow for the Committee named, for the purposes of addressing improved public relations and advocacy.

Rosina moved the amended motion; Becky seconded. There were eight votes in favor and one against; the motion passed.

IX. Committee reports continued at this point in the meeting.

B. Curriculum

There was no report this month; the next meeting will be held tomorrow.

C. Human Resources

Becky moved the Independent Professional Development plan resolution; Rosina seconded. Becky clarified that the first two pages of the packet is the actual policy; the other two pages are the application and the rubric, which both can be modified by ICS administration as needed. Eli asked William whether the teachers are excited about this plan. William stated that most of the teachers don't really know about it and that Amy Leigh had been working on it when she was a Teachers' Rep. Becky stated that although we know that not much money will be available for this for this school year, we want to be ready for future years. William asked whether the reason for the plan was due to not having a sick day buy out or whether it was just for professional development. Becky stated it was for a little of both. Jurate added that we wanted to give a broader professional development opportunity to reward long-time ICS teachers. Eli and Pam

commended the committee for the work on this creative plan. Becky added that Jerry has recommended that ICS consider going to a paid leave plan (instead of specific sick and personal days) and that if we were to adopt such a plan the Independent Professional Development plan would be adjusted accordingly. The motion passed unanimously.

Becky moved the donation of sick time resolution; Rosina seconded. Elsie asked why maternity leave wasn't included. Becky explained that the focus of the plan is for serious medical illness only. The motion passed unanimously.

D. Policy

Eli moved the tobacco-free school motion; Becky seconded. Eli recognized the work of teacher Michael Farrell who assisted the service learning group who developed this plan last school year. Rona asked whether there were any objections from staff and Pedro asked about enforcement. Eli stated that the Policy Committee meeting at which this was discussed was open to all staff and no one came to object. He stated that students will continue to work on some additional aspects of the plan, including signage and whether or not to recommend that ICS not accept any funds from tobacco industry. The motion passed unanimously.

Rosina moved the "Right to Know" resolution; John seconded. Pedro asked what fees can be charged. Eli said the fees are set by the state. The motion passed unanimously.

E. Board Development

No report was circulated. Pedro reported that prospective Board member Terry Johnson will be meeting with Jurate and some Board members on November 13th. Pam encouraged Pedro to urge these prospective Board members to attend the ICS 365 event next week. Pam reported that she has agreed to coordinate a Board conference and will be circulating a questionnaire to all Board members regarding topics and dates. Becky clarified that no Board deliberation occurs at these conferences. Pam stated the conference gives Board members a chance to talk about what we do. The plan is for the conference to occur by February.

IX. Public Comment Period

One public comment from ICS parent Tina Kluetmeirer, regarding concern over the end of the day student dismissal plan, was submitted via the feedback @independencecharter.org e-mail and was circulated with the meeting packet. In addition, ICS parent Laura Weinbaum spoke about her concern about safety during dismissal. She noted that dismissal appears to be chaotic and that it's difficult to sort out the walkers from the drivers. She suggested that the pick up area be expanded along Lombard Street and that walkers and drivers be kept in separate groups. She also stated that she feels that communication from the school administration about the plan has not been productive. She ended by reading an acrostic poem, using the word "dismissal," written by her daughter Rose, who is an ICS student.

X. Old Business

There was no old business

XII. Adjournment

Becky moved to adjourn; Rosina seconded. The meeting was adjourned at 9:02p.m.

Handouts circulated at this meeting:

Agenda

Minutes from October 2009 meeting

CEO report

Food Services contract timeline

PTA Report

Teachers' Report

September financials

Finance Committee Minutes

Development Report

Human Resources Committee Minutes

Policy Committee Minutes

**Independence Charter School
November 4, 2009
Resolutions**

ADOPTED

1. September Disbursements

Be it resolved that the Independence Charter School Board of Trustees hereby approve disbursements from the month of September 2009 in the amount of \$287,026.86 as presented to the Board.

2. Committee of 50,000 Students

Whereas, media outlets in Philadelphia have presented multiple negative articles about charter schools, and

Whereas the general public appears to have many misconceptions about charter schools and how they function, and

Whereas there has been a move locally to cap the growth of charter schools, and

Whereas a Charter School Committee advocating for better public relations and advocacy of successful local charter schools has

formed and is named the Charter School Committee of 50,000 students, now

Be it resolved that the Independence Charter School Board of Trustees approves our participating in the Committee of 50,000 Students public relations efforts, including but not limited to signing on to committee-produced materials. Be it further resolved that the Board of Trustees of Independence Charter School approved the disbursement of \$10,000 to the Greater Philadelphia Urban Affairs Coalition who will hold the money in escrow for the Committee named, for the purposes of addressing improved public relations and advocacy.

3. Independent Professional Development Plan

Be it hereby resolved that the ICS Board of Trustees adopt the attached Independent Professional Development Policy.

4. Donation of Sick Leave

Whereas ICS values its employees and recognizes the commitment and dedication of ICS employees, and

Whereas employees may at any time find themselves faced with serious medical illness resulting in loss of work days, some of which may not be covered by sick leave and/or disability insurance, and

Whereas the ICS employee community desires to acknowledge its concern for fellow employees,

The Independence Charter School (ICS) Board of Trustees hereby resolves as follows:

ICS employees who earn sick days may contribute a maximum of one (1) sick day per fiscal year to another staff member for use due to serious medical illness. Staff members may donate a maximum of three (3) sick days per fiscal year, but not more than one (1) to the same employee. Sick days may not be donated for maternity leave. The collective maximum number of sick days contributed to a single employee under this policy shall not exceed the number of days required for the employee to become eligible for short-term disability insurance benefits, or

twenty (20) days, whichever is fewer. This policy shall be effective retroactive to September 1, 2009 and will expire June 30, 2010.

5. Tobacco Free School

Whereas the Independence Charter School Class of 2011 has identified the dangers of tobacco use as a key issue facing the school community, and;

Whereas in the sixth grade, students of the Class of 2011 used Need in Deed's "My Voice" service-learning framework to research, examine, and develop a plan to address the issue of tobacco use in the school community, and;

Whereas Jerome Henry, as representative of the Class of 2011, presented the proposed policy for Tobacco Free Building/Campus Policy, to the Policy Committee of the Board of Trustees at its October meeting.

Be it hereby resolved that Independence Charter School prohibits the use of tobacco products inside the school building, on school grounds, or during any school sponsored event.

It is further resolved that Section 8 of the Independence Charter School Employee Handbook shall be amended to include the following: "Employees of Independence Charter School shall not use tobacco products in the school building, on school grounds, at school sponsored events, or within 20 feet of school facilities at any time."

The Class of 2011 will continue to play a leadership role in developing necessary signage and communication about the dangers of tobacco use and the school-wide ban on the use of tobacco.

6. Right to Know Policy

Be it hereby resolved that the ICS Board of Trustees adopt the attached "Right to Know" policy.

**Resolutions
DEFEATED
None**

**Resolutions
TABLED
None**

ATTACHMENTS

Independent Professional Development Policy

Independence Charter School (ICS) values the professional development of its teaching staff and provides professional development opportunities to all teachers. ICS provides tuition reimbursement in many cases to further both the professional development of the staff member and the need for highly qualified and state certified teachers.

ICS also values staff members who demonstrate their commitment to ICS' students and their need for consistency and continuity of instructional leadership in the classroom by coming to work every day. ICS values its teachers who do not use sick time, unless for actual illness or other approved use.

Therefore, to reward staff members who are eligible for professional development benefits, who have banked substantial sick days, and who are fully certified in Pennsylvania to teach in the

grade or subject matter that they are employed to teach at ICS, ICS offers the following Independent Professional Development Program.

All proposals for Independent Professional Development must be approved by both the Principal and the CEO and approval is in the sole discretion of the CEO. Criteria other than that specified in this policy, such as fiscal considerations, may be considered by the Principal and the CEO in determining whether a proposal will be approved. Use of funds according to this policy shall replace benefits that would otherwise be available to teachers under the Professional Development and Tuition Reimbursement policies in the same fiscal year (July 1 through June 30).

Qualifying Criteria:

- ✓ All favorable observations by administration
- ✓ PA certification in required areas (or completed all coursework and examinations required for certification by the Pennsylvania Department of Education)
- ✓ Banked sick days
 - Tier I – employee must have at least 25 banked sick days
 - Tier II – employee must have at least 35 banked sick days

The tiers will be used to determine the amount of school time the teacher will be permitted to miss (if any), the number of sick days to be deleted from the teachers' bank of sick days, and the financial contribution ICS will make to an individual Independent Professional Development plan.

- ✓ A proposal that demonstrates a connection between the proposed Independent Professional Development Plan and the ICS curriculum. Application procedures, forms and deadlines will be determined by the administration on an annual basis.

Use of Independent Professional Development Funds

Funds from this program may be used to supplement:

- travel and/or registration costs for a national or international education conference
- travel and/or registration costs for a class or workshop (outside of the applicant's graduate studies)
- travel costs for the purpose of observing a master teacher or model school
- travel costs to allow applicant to experience aspects of cultures with the demonstrated intent and plan for bringing a benefit to ICS students

Because the purpose of the policy is to expand the resources available to ICS students by supporting the growth and development of ICS teachers, proposals that include travel to a teacher's country of origin shall be subject to additional scrutiny by the CEO.

Funding Scheme

The CEO shall determine by April of each year the number of plans that may be approved in the following fiscal year, if budgeting circumstances allow. Approved plans must be carried out in the fiscal year for which they are approved. Teachers unable to carry out an approved plan may re-apply in subsequent year. The CEO may re-evaluate at any time whether it is in the interests of ICS to fund the program and may revoke approval, unless the staff member has incurred expenses or obligations that are non-refundable and unalterable.

Tier I

- Must have 25 banked sick days (all sick leave must be available at the time of the trip)
- 10 sick days will be deleted upon completion of the program
- Teacher may take the trip in the summer or another time that students are not in school
- Trip must be documented by a journal, photography or other media
- Teacher must report on the trip to the entire staff upon return
- Maximum financial contribution of ICS to the proposed plan: \$2000

Tier II

- Must have 35 banked sick days (all sick leave must be available at the time of the trip)
- 20 sick days will be deleted upon completion of the program
- Teacher may miss up to five days of instructional time or may take the trip in the summer or another time that students are not in school
- Trip must be documented by a journal, photography or other media
- Teacher must report on the trip to the entire staff upon return
- Maximum financial contribution of ICS to the proposed plan: \$2500

Proposed- Right to Know Policy

External to be Posted on the ICS Website

Pennsylvania Right to Know Law

Independence Charter School prides itself on being a model school citizen. It holds the highest standards for its students and for itself as an institution. To insure complete compliance with the recently revised Pennsylvania Right to Know Law, Independence Charter School has taken the following actions:

- Independence Charter School is in compliance with all Pennsylvania Right to Know laws and statutes (65 P.S. 66.1 et seq).
- For complete information and questions about the Pennsylvania Right to Know Law please visit the state's Right to Know Web Portal: <http://openrecords.state.pa.us> or consult the state's Right To Know Citizens' Guide online at: <https://www.dced.state.pa.us/public/oor/rtkcitizensguidefinal.pdf>
- All Right to Know requests should be addressed to:

Jurate Krokys
Chief Executive Officer
Independence Charter School
1600 Lombard Street
Philadelphia, PA 19146

Fax: 215.238.1998

Email: righttoknow@independencharter.org

- In compliance with the law, you will receive a response in 5 business days from when the request was received. The response will include either: information requested, a denial of your request, or a request for a 30 day extension.
- ICS maintains the right to charge applicable fees pursuant to (65 P.S. 66.1 et seq) for any Right to Know request. A schedule of these fees can be found at:
http://openrecords.state.pa.us/portal/server.pt?open=512&objID=4434&&PageID=462051&level=2&css=L2&mode=2&in_hi_userid=2&cached=true#ques9

Internal Policy and Guidelines for handling request

- The Independence Charter School Open Records Officer is:

Jurate Krokys
Chief Executive Officer
Independence Charter School
1600 Lombard Street
Philadelphia, PA 19146
Fax: 215.238.1998
Email: righttoknow@independencharter.org

- Independence Charter School shall follow all applicable statutory requirements under Pennsylvania's Right to Know Law, 65 P.S. §66.1 et seq.
- The ICS Open Records Officer shall follow the following guidelines when a Right to Know request is received:
 1. Note the date of receipt on the written request.
 2. Compute the day on which the five-day period will expire and make a notation of that date on the written request.
 3. Maintain an electronic or paper copy of each written request, including all documents submitted with the request until the request has been fulfilled. If the request is denied, the written request shall be maintained for 30 days or, if an appeal is filed, until a final determination is issued under section 1101(b) or the appeal is deemed denied.
 4. Create and maintain a paper copy or electronic file for all communication including a copy of the original request.
- If the Open Records Officer feels that a request should be denied, or that any portion of a request should be denied, then a copy of the request should be immediately sent to the school attorney for review.

The Chair of the Policy Committee of the Board of Trustees with the Open Records Officer will monitor developments and changes to all applicable law as they develop. Any changes resulting from court case and/or legislation will be communicated and documented by the Open Records Officer and the Chair of the Policy Committee in consultation with the school attorney.