

DC CAN Academy Closure Policy

Introduction

The Office of the State Superintendent of Education (OSSE), Postsecondary and Career Education Division, through its Career Education Development unit, provides seed money for the implementation of NAF academies within eligible campuses. The DC Career Academy Network (DC CAN) supports the establishment and continued development of NAF academies at public high schools located in Washington, DC. The NAF academy model includes rigorous, industry-focused curricula, integrated industry partnerships, and work-based learning experiences.

The purpose of this policy is to establish procedures, provide guidance and technical assistance with regard to the state-level concerns related to the closure of a DC CAN NAF academy and to ensure that impacted students are provided the opportunity to continue with the chosen program of study. This policy highlights the following state-level concerns:

- I. Notification of Closure
- II. Submission of Closure Plan
- III. Financial and Grants Closeout
- IV. Dispersal of Unspent Funds
- V. Disposition of Assets
- VI. Data Collection and Reporting

I. Notification of Closure

A local education agency (LEA) or campus administrator may decide to close a DC CAN NAF academy for a variety of reasons including, for example, lack of student persistence, voluntary relinquishment of an academy, or nonrenewal of an academy. LEAs should work to ensure that academy closures only occur at the end of an academy school year.

DC CAN grant recipients must adhere to the terms and conditions of the grant award notification (GAN). LEAs and/or campus administrators that fail to meet the requisite terms and conditions of the GAN are subject to termination of award *and* separation from the DC CAN and all of its supportive services, including the use of the DC CAN brand and affiliation with the executive and industry advisory boards.

Closure

Within ten (10) calendar days of the decision to close a DC CAN NAF academy, the LEA shall provide OSSE with written notification of the pending academy closure. The notification and all other related correspondence should be sent to:

Office of the State Superintendent of Education (OSSE) Office of Career Education Development 810 First Street, NE, 2nd floor

Email: osse.cteif@dc.gov

The notice shall include the following information:

- 1) Name of the academy that will be closing;
- 2) Effective date of the closure;
- The reason(s) for academy closure;
- 4) Number of students, by grade level that will be impacted by the academy closure;
- 5) Names and contact information for the following persons:
 - a. LEA point of contact responsible for the academy's closure and student transition;
 - b. Campus point of contact responsible for the academy's closure; and,
 - c. Names and position titles of academy staff that will be impacted by the closure.

Within fourteen (14) calendar days of the LEA decision to close the academy, the closing academy shall provide written notification of the impending closure to the parents or guardians of all students enrolled in the closing NAF career academy. The notification shall:

- 1) Inform the parents or guardians of the date when the academy will close;
- 2) Provide guidance, as appropriate, on all possible career and technical education (CTE) options that would enable the student to continue matriculation within a career-theme; and,
- 3) Provide information, as appropriate, to student's parent or guardian that would ensure a smooth transition for enrollment to another academy.

II. Submission of Closure Plan

Within twenty one (21) calendar days of deciding to close a DC CAN NAF academy, the LEA shall submit a closure plan to OSSE. OSSE shall review the academy closure plan in collaboration with the LEA and academy staff and establish a schedule for completion of all items required in the closure plan. Closure procedures included in the DC CAN academy closure plan shall include the following:

- 1) For each student transferring to another LEA, a description of the plan for transferring and maintenance of the following dataⁱ: (1) all student records, including without limitation a student's transcripts, annual state assessment tests as well as completed NAF courses and internships, and (2) transfer and maintenance of all special education records;
- 2) Action plan that details the guidance and support the academy will provide to students' parents or guardians during the closure process, including transitioning students to another program with the school, campus or LEA that supports the career theme, and facilitating contact between students' parents or guardians and the LEA.
- 3) Plan for student participation in work-based learning activities until expiration of the academy;
- 4) Detailed list of all assets purchased with academy activity funds;

- 5) Recommended alternatives for existing academy students within the chosen career-theme and the process to facilitate student transfers and personnel records;
- 6) Information describing the academy's assets, including a thorough account of academy activity funds (expenditures and projected unspent funds) as well as academy supplies and equipment; and
- 7) Plan for notifying stakeholders (e.g. NAF, DC CAN Executive and Industry Advisory Board members, other site-based support, and other academies within the DC CAN) of the closure.

The closure plan must include specific strategies to address the way in which the LEA and school will support families, students, and staff:

1. Supporting Transition for Families

Suggested elements:

- a) Communications strategy that provides frequent, clear updates on what to expect
- b) Individualized communications to families outlining educational options and timelines
- c) Direct support to search for and apply to an appropriate program for the following school year
- 2. Addressing the Academic Needs of DC CAN academy students Suggested elements:
 - a) Targeted data support and review to coordinate individualized transition planning
 - Academic interventions to ensure students remain on track and that gaps are identified, documented, and addressed
 - c) For 11th and 12th graders, individualized graduation plans to assure high school graduation and NAF Track Certification
- 3. Supporting Transition for Staff

Suggested elements:

- a) Communications strategy that provides frequent, clear updates on what to expect
- b) Contingency staffing plan to address anticipated attrition and increased turnover

III. Financial and Grants Closeout

Upon receiving notification of the closure, OSSE will review the applicable grant and funding documents and within fourteen (14) calendar days notify the LEA of its findings with regard to grant award, reimbursements, and balances. The LEA must reference the existing budget, reconcile all financial obligations and provide an accurate account balance to OSSE. Specifically, the LEA, school and academy administrators shall take the following steps:

- 1) Submit reimbursement requests for all allowable expenditures;
- 2) Provide supporting documentation with reimbursement requests for all grant funds;
- 3) Provide a spending plan to identify possible amount of funds that may lapse, and establish a timeline for submitting reimbursement requests; and
- 4) Prepare and submit any and all financial, performance, or other audits or reports required under the terms of the grant.

IV. Dispersal of Unspent Funds

The LEA may only incur new costs to cover salaries and benefits for the academy staff (if personnel costs are currently covered under the existing grant) as well as any costs (other objects) associated with preplanned work-based learning activities. Funds may no longer be accessed for payment of professional services; equipment; and supplies and materials. Any requests for an exception to this policy must be submitted in writing and will be at the discretion of the Director of Career Education Development. Final reimbursement requests should be submitted within <u>45 calendar days after</u> the final day of operation. OSSE reserves the right to reallocate unused funds.

V. Disposition of Assets

OSSE is responsible for monitoring grant recipients to ensure compliance with applicable laws and regulations. Although, the DC CAN academy activity funds are derived from local funds, the LEA and the closing DC CAN academy shall reference the definitions of equipment and supplies found in 2 CFR § 200.33 and §200.94 respectively and submit to OSSE an equipment/inventory log. This log shall include all supplies, considered small and attractive items that cost less than the equipment cost threshold, such as computing devices (i.e. laptops, desktop computers, tablets, smart boards, projectors, personal digital assistants (PDAs), cell phones, printers) and their accessories. All of the aforementioned property shall remain property of OSSE, unless OSSE declares the property to be "excess" or designates it as "exempt property."

OSSE will review and verify the equipment/inventory log (sample below) in coordination with the LEA and the academy staff; and will coordinate with the LEA about the proper procedure for managing the assets, consistent with federal regulations. The inventory log shall include:

- Small and attractive items that cost less than the equipment cost threshold, such as computing
 devices and their accessories;
- 2. An identification number that corresponds to a tag on that item;
- 3. The cost of the item and purchase date;
- 4. The physical location of the item in the closing academy; and
- 5. Name and contact information for person(s) handling the management of assets.

Equipment/Inventory Log sample:

Equipment/Inventory POC:

Equipment/Inventory POC Email:					
Equipment/Inventory POC Phone:					
Ī	Description of Item	Location of Item in School	Identification Number	Purchase Date/Cost	
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The Equipment/Inventory Log shall be submitted to OSSE at least 45 calendar days prior to the effective date of closure. OSSE shall facilitate the transfer of inventory according to the following procedures:

- 1. Review of equipment/inventory log;
- 2. Visit school to audit items; and
- 3. Contact DC CAN academies about inventory.

Property purchased with local funds cannot be liquidated and shall be transferred according to the following procedures:

- 1. The closing DC CAN academy shall submit a log of all equipment, and all supplies considered "small and attractive items".
- 2. OSSE shall send notice of availability of items to all DC CAN academies.
- 3. All DC CAN academies have 48 hours from the time of publication of the list of property to request items along with a justification of need.
- 4. Within (10) business days, OSSE shall determine the disbursement of equipment and supplies, based on identified need.
- 5. Other DC CAN academies shall be given the opportunity to claim undisbursed items.
- 6. In the event that no other academy claims the property, such property shall remain at the campus and be utilized by the general student body.

The DC CAN academy shall secure and store the property and any other assets that belong to others in order to protect these assets against theft, misappropriation, or deterioration. The school administrators and academy staff shall immediately take steps to secure all the equipment and supplies, and maintain daily security over those assets until disposed.

VI. Data Collection and Reporting

The closing academy shall complete its reporting obligations by providing OSSE with required data for the semi-annual and annual reports and, updating the NAF database accurately addressing the status of all deliverables.

A closing academy is required to fulfill data requirements in advance of the normal due date to ensure all appropriate data is provided to OSSE and to NAF prior to the departure of the academy staff and other key personnel acquainted with and responsible for collecting and reporting this data.

¹ All transfer of student-level data must comply with data privacy/transfer best practices.