



# Corporate Policy Manual

2023

# TABLE OF CONTENTS

INTRODUCTION..... 2

ACCEPTABLE USE POLICY FOR TECHNOLOGY SYSTEMS ..... 3

ANTI-BULLYING POLICY..... 7

CODE OF ETHICS POLICY ..... 9

CONFLICT OF INTEREST AND ANTI-NEPOTISM POLICY .....15

CREDIT RECOVERY POLICY .....21

ENROLLMENT & ADMISSIONS POLICY .....24

FINANCIAL MANAGEMENT AND OVERSIGHT POLICY .....27

INTERNET SAFETY POLICY .....33

INVENTORY CONTROL POLICY.....36

NAME DEVIATION REQUEST POLICY .....38

PARENT AND FAMILY ENGAGEMENT POLICY .....39

PROCUREMENT POLICY AND ETHICAL STANDARDS .....42

PROTECTION OF STUDENT INFORMATION POLICY.....47

SCHOOL BATHROOMS, LOCKER ROOMS, & DRESSING ROOMS.....50

SCHOOL SAFETY & THREAT MANAGEMENT POLICY.....52

SPECIAL MAGISTRATE FOR TEACHER EMPOWERMENT POLICY .....73

SUSPENSION AND EXPULSION POLICY .....75

TEACHER APPRENTICESHIP PROGRAM POLICY .....79

UNRESOLVED STUDENT WELFARE COMPLAINT POLICY .....83

Appendix A: Board Certification of Policy Approvals .....85

---

## INTRODUCTION

---

The policies contained herein apply to the corporate structure of Clear Choice Academies, Inc., including its affiliate institutions, Ocali Charter Middle School and Ocali Charter High School.

At Clear Choice Academies (CCA), our unwavering commitment resides in upholding the utmost standards of integrity, transparency, and equity across our corporate directives. These directives delineate the fundamental principles and benchmarks, ensuring that personnel, executives, and/or representatives associated with Clear Choice Academies, its educational institutions, affiliations, and subsidiary entities, who partake in the process of selecting, bestowing, and managing federally or state funded contracts, adhere to impartiality, steer clear of potential conflicts of interest, and maintain a pinnacle of excellence.

Policies within this manual may be reviewed and revised during regularly scheduled board meetings, and have been, or will be, approved by the governing Board of Directors, as duly noted at the conclusion of each respective policy.

### **DELEGATION OF RESPONSIBILITY:**

The Executive Director shall ensure that the policies contained herein, are reflected in the administrative guidelines and/or student code of conduct, and are reviewed annually by both staff and students.

The Executive Director, in cooperation with other administrators and appropriate staff members, shall review these policies every two (2) years and recommend necessary revisions to the Board of Directors for review and consideration. School administrators and Supervisors shall annually provide the following information to the Board of Directors to ensure safe work and learning environments:

- *Report of Violations/Incidents of Violation*
- *Information on the Development and Implementation of Policies*

Where necessary, student and staff handbooks shall contain appropriate and applicable policies and shall be disseminated annually to all staff and students with acknowledgement of receipt.

The policies shall be accessible to the public.

---

## ACCEPTABLE USE POLICY FOR TECHNOLOGY SYSTEMS

---

*Effective: July 1, 2020*

### **POLICY STATEMENT:**

Clear Choice Academies (CCA) is committed to upholding the highest standards of integrity, transparency, and fairness in technology access and usage. Access and Use of Technology Systems Technology refers to the hardware, networks, software, data/information, documentation, or any combination thereof, which constitutes the data processing systems of Clear Choice Academies (CCA), its schools, affiliates, and subsidiaries. The administration is authorized and directed to develop programs, guidelines, and rules that:

1. Communicate the school's policy on access to and the use of technology by students, employees, and parents through handbooks, manuals, and publications.
2. Inform students, employees, and other technology users at CCA about the consequences of misusing technology.
3. Incorporate instruction on the legal and ethical use of technology into appropriate student educational programs.
4. Incorporate instruction on the legal and ethical use of technology into appropriate staff development programs.

### **Application for Account and Terms and Conditions for Computer, Network, and Internet Use**

High-speed internet access is provided to students and staff at CCA with the intention of promoting educational excellence through online resource sharing, innovation, and communication. However, along with access to computers and individuals worldwide, there is also the availability of material that may not align with educational goals within the school context. CCA has implemented measures to limit access to inappropriate content. Nevertheless, on a global network, it is impossible to completely control all materials, and resourceful users may encounter unsuitable or inappropriate information. Despite these challenges, CCA firmly believes that the wealth of valuable information and collaborative opportunities on this network outweighs the potential for users to access material not consistent with our educational objectives.

### **Terms and Conditions:**

Clear Choice Academies (CCA) is dedicated to employing technology as a vital tool for its staff, students, teachers, and parents. We are delighted to provide a broad spectrum of technologies. The internet and computers within our network are utilized to bolster the educational goals of CCA, allowing for enhanced learning opportunities and improved

communication. Use of these technologies is a privilege and is subject to a variety of terms and conditions. The organization retains the right to change such terms and conditions at any time.

1. **ACCEPTABLE USE:** The purpose of technology and the internet is to support research and education in and among academic institutions by providing access to unique resources and opportunities for collaborative work. The use of these resources may not be used in violation of any federal, state, or local regulation. These resources may not be used to upload, view, download, or distribute sexually explicit (pornographic or obscene), threatening or violent, illegal drug paraphernalia, or other material deemed inappropriate or not intended to support educational objectives. These resources may not be used to infringe on copyright or to plagiarize materials without proper credit given to the author, publisher, and/or owner of the material.
2. **COMMUNICATION:** It is expected that language used for submitting academic work, engaging in online forums, and collaborative efforts is relevant and suitable. Users must exercise consideration and mindfulness when communicating online or through messages to others. It's important to be aware of how one's words might be perceived by others. Offensive language or profanity should be avoided. Please note that the use of CCA technology, including software programs, emails, and electronic forms are not ensured to remain private, and may be occasionally reviewed by the Administration to ensure compliance with this policy. Any messages pertaining to or endorsing unlawful activities may be reported to the appropriate authorities.
3. **PRIVACY:** Ensure familiarity of the privacy settings on websites to which you subscribe. Recognize that any online or electronic activity is not confidential and may be subject to monitoring. Refrain from disclosing personal information such as your own, your family's, school, or faculty members', including passwords, full names, addresses, or phone numbers. Do not engage with unsolicited online contact.
4. **HONESTY AND SECURITY:** Refrain from actions that jeopardize your own well-being or that of others. Avoid misrepresentation, which encompasses using an account that does not belong to you to access the network. If you feel unsafe, are being bullied, or observe any troubling behavior, promptly seek assistance from an appropriate staff member or Administrator.
5. **EDUCATIONAL INTENT:** The intent of providing technological tools is to encourage and engage in the use of technology for educational purposes and support the advancement of knowledge. Approach with a positive attitude and be willing to explore different technologies. Assess the credibility of information presented online and understand that not everything online is true or accurate. Properly document and cite (or reference) all information acquired through online sources, including but not limited to text, images, videos, and music that belong to someone else. There are resources available that may be free-to-use without copyright infringement, and

should be used first, when possible.

6. **RESPECT FOR PROPERTY AND VANDALISM:** The technology hardware, software, and equipment are owned by CCA and provided as a courtesy to users as a tool for educational purposes. Disrespect, misuse of property, or vandalism will result in the suspension or termination of privileges. Misuse includes any malicious attempt to harm or destroy data, defacing or purposeful destruction of hardware or software owned by CCA, uploading or creating computer viruses that undermine the data or operation of technological devices, or other malicious intent. Violators may be liable for costs associated with repair or replacement, fines, and civil or criminal penalties as allowed by law.
7. **COMMERCE:** It may be possible for students to purchase goods and services via the internet, and these purchases could potentially result in unwanted financial obligations. Any purchasing of goods and/or services via the internet is strictly prohibited on CCA networks by unauthorized personnel, students, or guests.
8. **INTELLECTUAL PROPERTY:** All information and/or material created with or placed on the network or CCA computers becomes CCA property, and CCA reserves all rights to any material stored in files which are generally accessible to others. CCA will remove any material from the network at its discretion, if it violates corporate policy or is unlawful or otherwise objectionable.
9. **ELECTRONIC DEVICES:** Students may utilize electronic devices for instructional or educational purposes, provided they receive prior authorization from their classroom teacher. Instructors will define the permissible devices, their usage timelines, and the appropriate conduct when using them within the classroom context. However, students are explicitly prohibited from employing these devices for recording purposes that could breach copyright laws, disrupt the learning experience of others, or create disturbances in the educational environment.

If a student employs such devices for entertainment, communication, or any non-educational engagement, the device will be confiscated and held at the front office until the conclusion of the school day, after which it will be returned to the student. For repeated violations, students will forfeit their privilege to use electronic devices and will be required to participate in a meeting with the Principal and a parent to address the policy and consequences for their actions.

The range of devices includes, but is not limited to, laptops, smartphones, smartwatches, personal tablets, calculators, or any other electronic devices. It's important to emphasize that Clear Choice Academies (CCA) bears no responsibility for electronic devices brought to school by students. These devices may be exposed to risks such as damage, loss, or theft, for which students are accountable at their own expense and risk.

## **EDUCATIONAL APPLICATIONS**

CCA offers users a free, educational suite of applications to enhance teaching and learning, provided by Google and/or Microsoft, offered through a concept known as “cloud computing,” where services and storage are provided over the internet. In order to use these applications, users must adhere to the CCA Acceptable Use Policy, as well as the Terms and Conditions required by the maker of the applications.

Additionally, it is important for users to be aware of the following:

1. The makers of the applications may store data in data centers outside U.S. borders.
2. The makers may terminate user accounts if they fail to abide by their Terms and Conditions or Acceptable Use Policies that may include:
  - a. Generating or facilitating unsolicited bulk commercial emails or communications (also known as SPAM)
  - b. Violation, or encouragement of violation of, the legal rights of others
  - c. Unlawful, invasive, infringing, defamatory, or fraudulent purposes
  - d. Intentional distribution of malicious or invasive programs such as viruses, worms, Trojan horses, corrupted files, hoaxes, or other destructive or deceptive nature
  - e. The interference of Services or equipment used by the services, their customers, authorized resellers, or users
  - f. Altering, disabling, interfering, or circumventing any aspect of their services
  - g. Testing or reverse-engineering their services to find limitations, vulnerabilities, or evasion of filtering capabilities
  - h. Use of services in a manner not authorized by the maker

---

## **ANTI-BULLYING POLICY**

---

*Effective: January 1, 2020*

### **PURPOSE:**

Clear Choice Academies (CCA) is dedicated to fostering a secure and constructive learning environment for its staff, students, and guests. CCA acknowledges that bullying and intimidation can detrimentally impact the school and work environment. Clear Choice Academies strictly prohibits any form of bullying by its staff, students, vendors, or contractors and it is incumbent upon all staff members at CCA to not condone or tolerate any instances of bullying.

CCA will provide staff development training focused on identifying and preventing bullying. This training aims to foster a culture of acceptance and empathy among students and staff, enhancing our ability to create a safe and healthy learning and work environment.

### **DEFINITIONS:**

"Bullying" shall refer to a deliberate electronic, written, verbal, or physical action, or a series of actions, meeting the following criteria:

1. Aimed at one or more fellow students and/or staff members;
2. Occurring within a school environment and, at times, beyond it;
3. Demonstrating a level of severity, persistence, or pervasiveness;
4. Resulting in any of the following effects:
  - i) Substantially impeding a student's educational progress, teacher's ability to instruct, or staff member's ability to work;
  - ii) Establishing an environment of intimidation;
  - iii) Considerably disrupting the orderly functioning of the school or work environment.

"Bullying" also includes, but is not limited to:

1. Physical harm of another person
2. Damaging, extorting, or theft of another person's property
3. Placing a person in reasonable fear of harm on intimidation
4. Placing a person in emotional unrest by spreading rumors, manipulating social relationships or environment, engaging in social exclusion, extortion, intimidation, or ridicule
5. Forms of cyber-bullying (see below)
6. Creating an intimidating or hostile environment that substantially interfere with another's ability to perform his/her work
7. Creating verbal statements or written remarks that taunt, maliciously threaten, harass, or sexual solicitation or inuendo
8. Retaliation against another person for reporting bullying or assisting in identifying, testimonial, or investigation of bullying

### **LEGALLY PROTECTED RIGHTS:**

The term, "bullying," shall not be interpreted to infringe upon a person's right to engage in legally protected speech or conduct.



**CYBER-BULLYING:**

"Cyberbullying" as defined within this policy encompasses various misuses of technology, which include but are not restricted to: harassment, teasing, intimidation, threats, or terrorization directed towards another student, teacher, or school employee. Such acts may involve inappropriate or derogatory email messages, instant messages, text messages, digital images, or content posted on websites (inclusive of blogs). **All forms of cyberbullying are unacceptable**, and if they disrupt the educational process of the school, individuals responsible may be subject to appropriate disciplinary action, which may involve legal and/or law enforcement proceedings.

**AUTHORITY:**

The Board of Directors at Clear Choice Academies (CCA) strictly prohibits all types of bullying. Each student and staff member is expected to uphold the rights of others and contribute to an environment that is devoid of bullying. As such, the Board encourages staff and students who have been subjected to bullying or those who witness such behavior to promptly report these incidents to the school Principal or Executive Director.

CCA encourages incidents to be submitted in writing, however, oral complaints will also be accepted and documented. The individual receiving the complaint is obliged to handle it impartially, neutrally, and professionally, setting aside any personal biases that could favor or disfavor the reporting party or those accused of violating this policy.

The Board of Directors mandates that both verbal and written complaints regarding bullying be promptly investigated, and appropriate corrective or preventive measures taken when substantiated allegations arise. The Board further directs that any complaint brought under this policy should also be evaluated for behavior that might not meet the definition of bullying as per this policy, but necessitates consideration and potential action under other Board policies. Throughout this process, confidentiality for all parties will be maintained in line with Clear Choice Academies' legal and investigative responsibilities.

**DISCIPLINARY CONSEQUENCES:**

Consequences for bullying may include counseling, remediation, parent/guardian conference, loss of specific privileges, transfer to another department or classroom, loss of bus privileges, detention, suspension, expulsion, termination of employment, or referral to a law enforcement agency.

---

## CODE OF ETHICS POLICY

---

*Effective: February 3, 2023*

### **PURPOSE:**

This is the Policy on Ethical Conduct of Instructional Personnel and School Administrators for Clear Choice Academies, Inc.

As a representative of the school, personnel and administrators must demonstrate and uphold standards of ethical conduct both in and outside of the classroom. Instructional personnel and school administrators have a duty, at all times, to:

- I. Abide by the Code of Ethics of the Education Profession in Florida (Rule 6B-1.001, F.A.C.)**
  1. The educator values the worth and dignity of every person, the pursuit of truth, devotion to excellence, acquisition of knowledge, and the nurture of democratic citizenship. Essential to the achievement of these standards are the freedom to learn and to teach and the guarantee of equal opportunity for all.
  2. The educator's primary professional concern will always be for the student and for the development of the student's potential. The educator will therefore strive for professional growth and will seek to exercise the best professional judgment and integrity.
  3. Aware of the importance of maintaining the respect and confidence of one's colleagues, of students, of parents, and of other members of the community, the educator strives to achieve and sustain the highest degree of ethical conduct.
  
- II. Uphold the Principles of Professional Conduct for the Education Profession in Florida (Rule 6B-1.006, F.A.C.)**
  1. Obligation to the student requires that the individual:
    - Shall make reasonable effort to protect the student from conditions harmful to learning and/or to the student's mental and/or physical health and/or safety.
    - Shall not unreasonably restrain a student from independent action in pursuit of learning.
    - Shall not unreasonably deny a student access to diverse points of view.
    - Shall not intentionally suppress or distort subject matter relevant to a student's academic program.
    - Shall not intentionally expose a student to unnecessary embarrassment or disparagement.
    - Shall not intentionally violate or deny a student's legal rights.
    - Shall not harass or discriminate against any student on the basis of race, color, religion, sex, age, national or ethnic origin, political beliefs, marital status, handicapping condition, sexual orientation, or social and family background and shall make reasonable effort to assure that each student is protected from harassment or discrimination.
    - Shall not exploit a relationship with a student for personal gain or advantage.
    - Shall keep in confidence personally identifiable information obtained in the course of professional service, unless disclosure serves professional purposes or is required by

law.

2. Obligation to the public requires that the individual:

- Shall take reasonable precautions to distinguish between personal views and those of any educational institution or organization with which the individual is affiliated.
- Shall not intentionally distort or misrepresent facts concerning an educational matter in direct or indirect public expression.
- Shall not use institutional privileges for personal gain or advantage.
- Shall accept no gratuity, gift, or favor that might influence professional judgment.
- Shall offer no gratuity, gift, or favor to obtain special advantages.

3. Obligation to the profession of education requires that the individual:

- Shall maintain honesty in all professional dealings.
- Shall not on the basis of race, color, religion, sex, age, national or ethnic origin, political beliefs, marital status, handicapping condition if otherwise qualified, or social and family background deny to a colleague professional benefits or advantages or participation in any professional organization.
- Shall not interfere with a colleague's exercise of political or civil rights and responsibilities.
- Shall not engage in harassment or discriminatory conduct which unreasonably interferes with an individual's performance of professional or work responsibilities or with the orderly processes of education or which creates a hostile, intimidating, abusive, offensive, or oppressive environment; and, further, shall make reasonable effort to assure that each individual is protected from such harassment or discrimination.
- Shall not make malicious or intentionally false statements about a colleague.
- Shall not use coercive means or promise special treatment to influence professional judgments of colleagues.
- Shall not misrepresent one's own professional qualifications.
- Shall not submit fraudulent information on any document in connection with professional activities.
- Shall not make any fraudulent statement or fail to disclose a material fact in one's own or another's application for a professional position.
- Shall not withhold information regarding a position from an applicant or misrepresent an assignment or conditions of employment.
- Shall provide upon the request of the certificated individual a written statement of specific reason for recommendations that lead to the denial of increments, significant changes in employment, or termination of employment.
- Shall not assist entry into or continuance in the profession of any person known to be unqualified in accordance with these Principles of Professional Conduct for the Education Profession in Florida and other applicable Florida Statutes and State Board of Education Rules.
- Shall self-report within forty-eight (48) hours to appropriate authorities (as determined by district) any arrests/charges involving the abuse of a child or the sale and/or possession of a controlled substance and DUI. Such notice shall not be

considered an admission of guilt nor shall such notice be admissible for any purpose in any proceeding, civil or criminal, administrative or judicial, investigatory or adjudicatory. In addition, shall self-report any conviction, finding of guilt, withholding of adjudication, commitment to a pretrial diversion program, or entering of a plea of guilty or Nolo Contendere for any criminal offense other than a minor traffic violation within forty-eight (48) hours after the final judgment. When handling sealed and expunged records disclosed under this rule, the school shall comply with the confidentiality provisions of Sections 943.0585(4)(c) and 943.059(4)(c), Florida Statutes.

- Shall report to appropriate authorities any known allegation of a violation of the Florida School Code or State Board of Education Rules as defined in Section 1012.795(1), Florida Statutes.
- Shall seek no reprisal against any individual who has reported any allegation of a violation of the Florida School Code or State Board of Education Rules as defined in Section 1012.795(1), Florida Statutes.
- Shall comply with the conditions of an order of the Education Practices Commission.
- Shall, as the supervising administrator, cooperate with the Education Practices Commission in monitoring the probation of a subordinate.

**Abide by all school policies and procedures with steadfast adherence to the following:**

Immediately report known or suspected child abuse or neglect to the Florida Department of Children and Families Toll-Free Hotline (1-800-96-ABUSE)

In accordance with section 39.201, Florida Statutes, any person who knows, or has reasonable cause to suspect, that a child is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the child's welfare, or that a child is in need of supervision and care and has no parent, legal custodian, or responsible adult relative immediately known and available to provide supervision and care shall report such knowledge or suspicion to the Department of Children and Families (DCF) Central Abuse Hotline at 1-800-96-ABUSE.

Instructional personnel and school administrators may report such information to DCF in unison, but reporting to another school employee does not fulfill the legal obligation to report to DCF.

A person who is required by statute to report known or suspected abuse or neglect and fails to do so, is subject to disciplinary action by the employer, by the State Department of Education and/or through criminal prosecution.

In section 39.01(2), Florida Statutes, the term "Abuse" means any willful act or threatened act that results in any physical, mental, or sexual injury or harm that causes or is likely to cause the child's physical, mental, or emotional health to be significantly impaired. Abuse of a child includes acts or omissions. Corporal discipline of a child by a parent or legal custodian for disciplinary purposes does not in itself constitute abuse when it does not result in harm to the child.

In section 39.01(44), Florida Statutes, an act of "Neglect" occurs when a child is deprived of, or is allowed to be deprived of, necessary food, clothing, shelter, or medical treatment or a child is permitted to live in an environment when such deprivation or environment causes the child's physical, mental, or emotional health to be significantly impaired or to be in danger of being significantly impaired.

In section 39.01(47), Florida Statutes, "Other person responsible for a child's welfare" includes the child's legal guardian or foster parent; an employee of any school, public or private child day care center, residential home, institution, facility, or agency; a law enforcement officer employed in any facility, service, or program for children that is operated or contracted by the Department of Juvenile Justice; or any other person legally responsible for the child's welfare in a residential setting; and also includes an adult sitter or relative entrusted with a child's care.

In accordance with section 39.203, Florida Statutes, any person who reports in good faith any instance of child abuse, abandonment, or neglect to the Department of Children and Families or any law enforcement agency, shall be immune from any civil or criminal liability which might otherwise result by reason of such action.

Immediately report to the Principal any alleged misconduct that affects the health, safety or welfare of a student, by other instructional personnel or school administrators.

In accordance with section 1012.795(1)(b) Florida Statutes, any instructional personnel or school administrator must report alleged misconduct that affects the health, safety or welfare of a student by instructional personnel or school administrators. Instructional personnel or school administrators who fail to report misconduct of other instructional personnel or school administrators that affect the health, safety or welfare of students shall be subject to disciplinary action up to and including termination of employment and revocation of their Florida Educator Certificate.

## **PROHIBITION OF BULLYING AND HARASSMENT**

All students and school employees have the right to an educational setting that is safe, secure, and free from harassment and bullying of any kind. The school will not tolerate bullying and harassment of any type. Conduct that constitutes bullying and/or harassment, as defined in section 1006.147, Florida Statutes, is prohibited.

Bullying means systematically and chronically inflicting physical hurt or psychological distress on one or more students and may involve but is not limited to:

1. Teasing
2. Social Exclusion
3. Threat
4. Intimidation
5. Stalking
6. Physical violence
7. Theft
8. Sexual, religious, or racial harassment
9. Public humiliation
10. Destruction of property

Harassment means any threatening, insulting, or dehumanizing gesture, use of data or computer software, or written, verbal, or physical conduct directed against a student or school employee that:

1. Places a student or school employee in reasonable fear of harm to his or her person or

- damage to his or her property;
2. Has the effect of substantially interfering with a student's educational performance, opportunities, or benefits; or
  3. Has the effect of substantially disrupting the orderly operation of a school.
  4. Bullying and Harassment also include:
    - a. Retaliation against a student or school employee by another student or school employee for asserting or alleging an act of bullying or harassment.
    - b. Reporting an act of bullying or harassment that is not made in good faith is considered retaliation.
  5. Perpetuation of conduct listed in paragraph (a) or paragraph (b) by an individual or group with intent to demean, dehumanize, embarrass, or cause physical harm to a student or school employee by:
    - a. Incitement or coercion;
    - b. Accessing or knowingly causing or providing access to data or computer software through a computer, computer system, or computer network; or
    - c. Acting in a manner that has an effect substantially similar to the effect of bullying or harassment.

## **DISCRIMINATION PROHIBITED**

All employees shall abide by the school's policy on prohibiting discrimination. No person shall, on the basis of race, color, religion, gender, age, marital status, disability, political or religious beliefs, national or ethnic origin, or sexual orientation, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity, or in any employment conditions or practices conducted by the school, except as provided by law.

## **CONFIDENTIALITY AGREEMENT PROHIBITED**

In accordance with section 1001.42(6), Florida Statutes, the school may not enter into a confidentiality agreement, written or verbal, with an instructional personnel or school administrator who resigns, is terminated, or resigns in lieu of termination due to allegations, in whole or in part, of misconduct related to the health safety or welfare of a student. Any part of an agreement that has the purpose or effect of concealing misconduct which affects the health, safety or welfare of a student is void and contrary to public policy and shall not be enforced.

## **REFERENCE CHECKS**

In accordance with section 1002.33(12)(g), Florida Statutes, neither the school board nor any of its employees may provide instructional personnel or school administrators with employment references or discuss their performance with prospective employers from another educational setting without also disclosing the personnel's or administrator's misconduct.

In accordance with section 768.095, Florida Statutes, an employer who discloses information about a former or current employee to a prospective employer of the former or current employee upon request of

the prospective employer or of the former or current employee is immune from civil liability for such disclosure or its consequences unless it is shown by clear and convincing evidence that the information disclosed by the former or current employer was knowingly false or violated any civil right of the former or current employee protected under chapter 760, Florida Statutes.

## **TRAINING REQUIRED**

All instructional personnel and school administrators must engage in annual training on the standards of ethical conduct and the policy for reporting misconduct. Training may be provided or conducted as determined appropriate by the Governing Board or administration, but at a minimum must include examples of violations of the Code of Ethics and Principles of Professional Conduct and potential penalties, information on how to properly identify and report child abuse or neglect, procedures on how to report misconduct of other instructional personnel and school administrators, requirements of self-reporting criminal charges, the nature and consequences of disqualifying offenses, the importance of being a role model, and the fiduciary responsibility of being an educator.

## **REPORTS TO THE OFFICE OF PROFESSIONAL PRACTICES SERVICES (DOE)**

Any violation of these standards of conduct may result in the information being reported to the Office of Professional Practices Services for investigation to determine if disciplinary action should be taken against an educator's Florida Educator Certificate.

---

# CONFLICT OF INTEREST AND ANTI-NEPOTISM POLICY

---

*Revised: October 9, 2023*

## ARTICLE 1: PURPOSE AND REPLACEMENT OF PRIOR POLICIES

This policy pertains to the ethical conduct of Board Members, School Administrators, and Staff Personnel at Clear Choice Academies, Inc. and its affiliated charter schools. It supersedes and replaces all previous conflict of interest policies of the organization. The policy aims to protect the tax-exempt status of the organization when considering transactions or arrangements that may benefit the private interests of its officers, Governing Board, or staff or could lead to an excess benefit transaction. It is intended to complement state and federal laws governing conflict of interest for nonprofit and charitable organizations and to guide the Governing Board in handling conflicts of interest in accordance with local, state, and federal laws related to charter school operations.

## ARTICLE 2: DEFINITIONS

1. **Interested Person.** An “Interested Person” is any person serving as a member of the Governing Board, staff member (employee), or agent of this Organization who, as of the date of discussion or action by the Board, either:
  - Has a direct or indirect Financial Interest.
  - Intends to acquire such a Financial Interest during the proposed transaction.
  - Has an Other Interest qualifying as a Conflict of Interest.
2. **Financial Interest.** A “Financial Interest” includes, but is not limited to:
  - Ownership or investment interest in an entity transacting with the Organization.
  - Compensation Arrangements with the Organization or related entities.
  - Potential ownership or investment interest in or Compensation Arrangements with entities under negotiation with the Organization. Intent to acquire a Financial Interest during the proposed transaction is sufficient for this policy.
3. **Other Interest.** An “Other Interest” is any circumstance that may influence or appear to influence an Interested Person's actions, not aligned with the Organization's success and tax-exempt purposes.
4. **Relative.** A Relative refers to a parent, spouse, child, sibling, or immediate in-law, as defined by Section 112.3143, Florida Statutes.
5. **Compensation Arrangement.** A Compensation Arrangement is an agreement where a person may receive money or property from another party, regardless of services or value provided.
6. **Conflict of Interest.** A Conflict of Interest arises when an Interested Person, due to a Financial Interest or Other Interest, may be influenced by motives other than the Organization's success and tax-exempt goals regarding a matter discussed by the Board.



### ARTICLE 3: DISCLOSURE AND DETERMINATION OF CONFLICT

1. **Disclosure of Financial or Other Interest.** Interested Persons must disclose their Financial or Other Interest to the Board and legal counsel through written or verbal means before discussing or acting on relevant transactions, especially when considering vendor relationships and a competitive bidding process. Disclosures become part of the Board's meeting minutes, and responses are made in compliance with Florida's Sunshine Law.
2. **Recusal by Interested Person, if Legally Permissible.** Interested Persons must recuse themselves from discussions and actions concerning their disclosed interest if legally permissible under Florida law.
3. **Determination of Conflict of Interest.** The Board will determine if a disclosed Financial or Other Interest constitutes a Conflict of Interest, as prohibited by law. The Interested Person may only participate to explain their interest.
4. **Exceptions.** The Board may consider exceptions to conflicts under certain conditions, as outlined in Section 112.313(12), Florida Statutes:

An exception applies when a transaction or arrangement is awarded through a sealed, competitive bidding process to the lowest or best bidder, and:

- The Interested Person, their spouse, or child had no involvement in defining bid specifications or selecting the winning bid.
- The Interested Person, their spouse, or child did not attempt to influence the agency or its personnel beyond submitting the bid.
- The Interested Person submitted a disclosure statement to the Commission on Ethics before or at the time of bid submission, revealing their interests and the nature of the intended transaction.
- The purchase or sale is for legal advertising in a newspaper, for any utilities service, or for passage on a common carrier.
- The business entity involved is the sole source of supply, and the Interested Person fully discloses their interest to the Governing Board before the transaction occurs, including purchases, rentals, sales, leases, or other business dealings.
- The total amount of the transactions in the aggregate between the business entity and the Organization does not exceed \$500 per calendar year.
- The fact that an Interested Person is a stockholder, officer, or director of a bank will not bar such bank from qualifying as a depository of funds, provided it appears in the records of the Organization that the Governing Board has determined that such Board member has not favored such bank over other qualified banks.
- The Interested Person purchases in a private capacity goods or services, at a price and upon terms available to similarly situated members of the general public, from a business entity which is doing business with the Organization.

### ARTICLE 4: PROCEDURES UPON DETERMINATION OF CONFLICT

1. **Exclusion from Discussion and Vote.** When a Conflict of Interest exists, the Interested Person

shall not partake in discussions or vote related to the transaction. They may choose not to attend relevant meetings.

2. **Removal from Board.** In cases where Florida law prohibits excluding a Board member from a vote to address a Conflict of Interest, the Interested Person must resign or be removed from the Board.
3. **Action by Board.** The Board may only approve a transaction with a Conflict of Interest if the non-interested members determine it is in the Organization's best interest, fair, and reasonable. Alternatives may be explored if necessary. If an Interested Person, who is not a board member, engages in activity that results in a Conflict of Interest, the Board may immediately take action including, but not limited to, termination.

## **ARTICLE 5: DOCUMENTATION OF DISCLOSURE AND PROCEDURES**

1. **Meeting Minutes.** Meeting minutes shall include written and verbal disclosures of Financial and Other Interests, Conflict of Interest determinations, and actions taken. Minutes will detail discussions related to conflicted transactions and votes.

## **ARTICLE 6: OTHER PROHIBITED CONFLICTS OF INTEREST**

1. **Gift Solicitation and Acceptance:** In accordance with Section 112.313(2) of the Florida Statutes and Federal laws, neither Board members nor Interested Persons shall seek or receive anything of monetary value (including gifts, gratuities, favors, loans, rewards, promises of future employment, or services), from contractors or parties to subcontractors. Gifts or donations that are less than \$100 in monetary value, may be received by Interested Persons for use within the organization (such as classroom supplies to individual teachers, gift baskets or gift cards as thank you gifts or in recognition of a celebration or need). Offers of gifts above \$100 must be disclosed to the Board of Directors to determine conflict of interest, and if gift is accepted, it will be considered a "donation" to the Organization, and the property of the organization and may not be inured to the benefit of an individual Interested Person.
2. **Business Relationships with the Organization.** As per Section 112.313(3) of the Florida Statutes, Board members and Interested Persons, when acting in an official capacity, are prohibited from directly or indirectly procuring, leasing, or renting real estate, goods, or services for the Organization from any business entity in which they, their spouse, or child serve as an officer, partner, director, proprietor, or possess a significant interest. Furthermore, an Interested Person, acting privately, cannot rent, lease, or sell real estate, goods, or services to the Organization. This provision does not impact contracts established prior to the Board member's election.
3. **Conflicting Employment or Contracts.** Pursuant to Section 112.313(7) of the Florida Statutes, neither Board members nor Interested Persons shall engage in employment or contractual relationships with business entities or agencies conducting business with the Organization if it results in a recurring conflict between their personal interests and their duties as Board members or hinders the faithful execution of their Board responsibilities.
4. **Voting with Conflicts of Interest.** As outlined in Section 112.3143 of the Florida Statutes, Board

members must abstain from voting in an official capacity on matters that would lead to their personal gain or loss. This includes situations where the vote would benefit their employers, the parent organizations or subsidiaries of their employers, or individuals with whom they have a personal or business relationship.

5. **Prohibition of Certain Individuals Serving as Governing Board Members.** Pursuant to Section 1002.33(26)(c) of the Florida Statutes, employees of the charter school overseen by this Organization, their spouses, or employees of a charter management organization, and their spouses, are ineligible to serve as members of the governing board of this Organization.

#### **ARTICLE 7: RESTRICTIONS ON FAMILY EMPLOYMENT, IN ACCORDANCE WITH SECTION 1002.33(24), FLORIDA STATUTES**

1. **Defining Charter School Personnel:** Within this Article 7, "Charter school personnel" encompasses individuals holding positions such as Board members, superintendents, administrators, executive directors, principals, assistant principals, or any others employed by the charter school with equivalent authority in decision-making. They possess the power, or authority delegated to them, to appoint, employ, promote, or advance individuals, as well as recommend individuals for roles, employment, promotions, or advancements connected to charter school employment. This authority also extends to their role as members of the governing body of a charter school, where they participate in voting for the appointment, employment, promotion, or advancement of individuals.
2. **Defining "Relative":** In the context of this Article 7, the term "Relative" encompasses family relationships, including but not limited to parent, spouse, fiancé, child, sibling, uncle, aunt, first cousin, nephew, niece, in-law relationships, step-parent, step-sibling, or half-sibling (sharing biological relationship with one parent).
3. **Family Appointments:** Charter school personnel are prohibited from appointing, employing, promoting, advancing, or advocating for the appointment, employment, promotion, or advancement of any individual who qualifies as a relative. Individuals cannot be appointed, employed, promoted, or advanced within a charter school if such actions have been advocated by charter school personnel who hold positions at the school and also qualify as relatives of the individuals. This prohibition applies to positions within the charter school over which these personnel exercise authority or control. Additionally, this restriction applies to appointments, employment, promotions, or advancements made by the governing board when a relative of the individual in question is a member of that board.
4. **Budget Approval Exemption:** It is important to note that the approval of budgets does not establish "jurisdiction or control" as defined within this subsection.

#### **ARTICLE 8: DECLARATION OF RELATIVES EMPLOYED OR ASSIGNED TO CHARTER SCHOOL**

1. **Annual Disclosure Requirement:** In compliance with Section 1002.33(7)(a)18. of the Florida Statutes, the Charter School is obligated to annually disclose to its sponsoring school district the identities of all individuals who are employed by or assigned to work at the charter school and who qualify as relatives of any member of the governing board of directors, superintendent,

principal, assistant principal, or any other person employed by or assigned to work at the Charter School. For the purpose of this Article 8, the definition of "relative" remains consistent with the meaning outlined in Article 7 above.

## **ARTICLE 9: TRAINING AND BACKGROUND VERIFICATION OBLIGATIONS**

### **Governance Training**

1. Pursuant to Section 1002.33(9)(j) of the Florida Statutes, each director serving on the governing board must engage in governance training sanctioned by the Florida Department of Education within 90 days of their final appointment to the governing board. This mandated governance training encompasses a minimum of four (4) hours of comprehensive instruction, with a specific focus on the following core areas: government transparency, conflict of interest protocols, ethical standards, and financial accountability.
2. Following the initial four (4) hour training session, each governing board director is obligated, within the subsequent three (3) years of their tenure, and during every successive three (3) year interval, to complete a two (2) hour refresher course addressing the aforementioned four (4) topics. This refresher training is essential to maintain eligibility as a director. In the event that a director fails to attain the requisite two (2) hour refresher training within any three (3) year period, they must subsequently undertake the full four (4) hour instruction once more in order to regain their eligibility status as a director.
3. Additionally, in accordance with Section 1002.33(12)(g) of the Florida Statutes, each director on the governing board is obligated to undergo fingerprinting and background screening within thirty (30) days of their final appointment to the governing board. These fingerprinting and background screening processes are subject to periodic updates as stipulated by relevant legal requirements. Until the completion and clearance of the mandatory fingerprinting and background screening procedures for each director, they will not be permitted on the school campus while students are present, unless accompanied by charter school staff.

## **ARTICLE 10: INITIAL AND ANNUAL WRITTEN ASSENT**

Upon their initial appointment and annually thereafter, every director, principal officer, and committee member endowed with delegated governing board powers shall affix their signature to a statement. This statement, serves as an affirmation that the individual in question:

1. Has received a copy of the conflicts of interest policy.
2. Has thoroughly reviewed and comprehended the policy.
3. Has pledged compliance with the policy.
4. Recognizes that the Organization is a charitable entity, and to preserve its federal tax-exempt status, it must primarily engage in activities that advance one or more of its tax-exempt objectives.
5. If holding a position on the charter school governing board, is current with background checks and governing board training as mandated by Florida law for charter school governing board members.

This form will be periodically updated to align with alterations in legal requirements and the best

practices applicable to charter school governing boards.

#### **ARTICLE 11: PERIODIC EVALUATIONS**

In order to ensure that the Organization adheres to its charitable objectives and avoids involvement in activities that might jeopardize its tax-exempt status, periodic assessments shall be carried out. These assessments will, at a minimum, encompass the following areas:

- Determining if compensation agreements and benefits are equitable, supported by credible survey data, and established through negotiations conducted at arm's length.
- Verifying that transactions or agreements executed by the Organization adhere to its documented policies, are accurately documented, represent sensible investments or remunerations for goods and services, advance charitable missions, and are devoid of any personal enrichment, impermissible private advantage, or excessive benefit arrangements.

#### **ARTICLE 12: ENGAGEMENT OF EXTERNAL CONSULTANTS**

During the periodic assessments as outlined in Article 11, the Organization has the option, though not a requirement, to enlist the services of external advisors. In the event that external experts are employed, their involvement does not absolve the Board of its duty to oversee the execution of periodic reviews.

---

## CREDIT RECOVERY POLICY

---

*Effective: August 1, 2023*

### **POLICY STATEMENT:**

This policy adopted by Clear Choice Academies, Inc, (the “School”) and pursuant to Section 1003.53 Florida Statutes and State Board of Education Rule 6A- 6.0521 provides the policy for the School’s Credit Recovery Courses.

1. **Definition.**
  - a. “*Credit Recovery Courses*” mean elective, credit-bearing courses in English, mathematics, science, and social studies, listed in the current year’s Course Code Directory incorporated in Rule 6A-1.09441, F.A.C., with specific content requirements defined by state academic standards. Credit Recovery courses can be used in conjunction with local school district course grade forgiveness policies, as authorized by Section 1003.4282(4), F.S., or as remediation for students needing to prepare for an End-of-Course assessment retake.
  
2. **Requirements for Credit Recovery Courses.**
  - a. Prior to enrolling in a Credit Recovery Course, a student must have previously attempted the corresponding non-credit recovery course.
  - b. In order to successfully complete a Credit Recovery Course, a student must meet the end-of-course, (“EOC”) assessment requirements pursuant to S.1003.4285 F.S.
  
3. **Course Content and Format**
  - a. **Grade/Credit Recovery:** The following recovery programs have been established to assist students who have fallen behind their cohort due to previous retentions and/or loss of credit. The purpose of these opportunities is to give motivated students the opportunity to graduate with their cohort. The principal must approve enrollment in the programs listed below:
  - b. **Course Delivery:** The school will provide competency-based education (CBE)/credit recovery programs through a blended learning environment, pursuant to Section 1011.61(1), F.S., including:
    - i. **Direct Instruction:** CBE programs have been developed and implemented as components of dropout prevention efforts. The focus of CBE is on the mastery of course content objectives. Specific course credit is awarded when students demonstrate competency in the intended learning outcomes and the performance standards for the course.
    - ii. **Remote Centers:** Pursuant to Sections 1002.33 1002.37, 1002.45, 1002.455, 1003.498 and 1011.62(1), F.S.], the Principal may recommend students participate in virtual learning through Marion Virtual School (MVS) and/or Florida Virtual School (FLVS) for credit recovery and additional learning.

- iii. **Summer School:** Students whose end-of-year grade is a “D” or “F” in an academic course, may enroll in summer school (as funding permits) to ensure credit is awarded.

4. **Accommodations**

- a. Students with an Individualized Education Plan, a Section 504 Plan, or an English Language Learner Plan will be accommodated according to their respective plans as required by state and federal law and administrative rules.

5. **Course Grades and Student Progression**

- a. The school follows the Student Progression Plan of Marion County School District (MCPS), as follows:

**1. Middle School:**

- i. Promotion in Grades 6-8 Students will be regularly promoted at the end of the year to the next grade level if they have passed three courses from the core areas of English Language Arts (ELA), mathematics, science and social studies. The principal retains the right to promote a student if it is in the best academic interest of the student. Students who have failed a core course should, if possible, be placed in a credit recovery course in place of an elective until successful completion of core courses. Students will remain in Grade 8 until they meet requirements for promotion to high school. [§1003.4156, Fla. Stat. (2023)]
- ii. Promotion from Grade 8 to Grade 9 In order to be promoted to high school, a student must successfully complete academic courses as follows: a) Three middle school or higher courses in ELA b) Three middle school or higher courses in mathematics c) Three middle school or higher courses in social studies, one semester of which must include the study of state and federal government and civics education d) Three middle school or higher courses in science e) One course in career and education planning that result in a completed personalized academic and career plan for the student. Students who transfer to a middle school from an out-of-state or non-public Florida School will only be held responsible for earning units for the school year they enter a Florida public middle school and subsequent years in middle school. These students will be required to successfully complete at least one semester of a civics education course unless entering after the beginning of their second term of Grade 8.
- iii. Progression of Grade 8 Unit Deficient Students A student who is subject to retention in Grade 8 due to unit deficiency has the following options: a) One to two-unit(s) deficient: Makeup units via virtual instruction in a concentrated format, then progress to high school. This may be done during the summer (as funding permits) or at the start of the new school year. b) Three or more

units deficient at 15 years of age: May be eligible to attend the Acceleration Academies which are designed to accelerate unit/credit completion with the goal of making the student eligible for enrollment in high school at the completion of the program. Placement in the program will be contingent upon available seats. c) Middle school students who have reached the age of 16 are no longer regulated by compensatory school attendance. Therefore, these students may withdraw from middle school to pursue a General Educational Development (GED) credential.



---

## ENROLLMENT & ADMISSIONS POLICY

---

*Revised: October 31, 2023*

### **POLICY STATEMENT:**

Clear Choice Academies (CCA) is committed to upholding the highest standards of integrity, transparency, and fairness in the student enrollment and admissions process. This policy outlines the principles and guidelines to ensure employees, officers, and/or agents of Clear Choice Academies, its schools, affiliates, and subsidiaries, who engage in the selection, award, and administration of federal or state funded contracts will maintain impartiality, avoid potential conflicts of interest, and uphold a competitive and ethical enrollment and admissions process.

### **PRINCIPLES:**

CCA establishes and maintains written standards of conduct to govern the actions of individuals involved in the selection, award, and administration of contracts funded by federal awards to avoid conflicts of interest and ensures fairness and equitable, non-discriminatory student enrollment and admissions, providing equal opportunity for enrollment.

### **CODE OF CONDUCT:**

Clear Choice Academies and its subsidiaries and/or affiliates adheres to the following principles and guidelines that govern the actions of employees, officers, and/or agents who engage in the selection, award, and administration of the enrollment and admissions process:

1. **Non-Discrimination:** CCA schools will not discriminate on the basis of intellectual ability, measures of achievement or aptitude, athletic ability, disability (physical, mental, emotional, or otherwise), English language proficiency, race, ethnicity, gender, national origin, religion, ancestral or familial classification, or any other classification protected by law.
2. **Admission Requirements:** The school will follow the admission requirements of the District and/or Florida State Statutes in its selection process, which may include age (for grade-level admission), immunization requirements, or residency within a designated geographic area within the school district (if applicable), or otherwise required by local, state, and/or federal laws governing charter school enrollment.
3. **Enrollment Capacity:** The designated charter school has determined its enrollment capacity based on available resources, including physical facilities, staffing, and other relevant factors. This capacity is subject to periodic review and adjustment by the school's governing board and administration to accommodate student needs and curriculum requirements.

4. **Eligibility Criteria:** Students who meet the established requirements of the District and/or State for admission, will be eligible to be enrolled in the designated charter school with preferential treatment given based on the following prioritized categories, if applicable:
  - Automatic enrollment of students graduating to the next grade level at an affiliated school that shares the same governing board. This may include elementary to middle, middle to high, or relocation where another affiliated school resides.
  - Siblings of currently enrolled charter school students
  - Children or siblings of current staff members or founding board members
  - Remaining open seats will be eligible for our open lottery process
5. **Application Process:** The charter school will provide multiple methods for submitting applications, including online through the school website and printed paper forms. The open enrollment period(s) will be widely publicized through various means, which may include, but not limited to school's website, social media, local newspapers, community organizations, district sources, email, direct mail, events, etc. All applications must be received by the published deadline to be considered.
6. **Lottery Process:** An enrollment lottery will be conducted in a public and transparent manner. Each eligible applicant will be assigned a unique identifier for the lottery drawing. The lottery drawing will use a random selection method, such as a computerized random number generator. The date, time, and location of the lottery drawing will be communicated to the public in advance, and witnesses may be present to ensure the integrity of the process.
7. **Waiting List:** A waiting list will be maintained for eligible applications who were not initially selected in the lottery. As open seats become available, waitlisted applicants will be offered a seat in the order determined by the lottery drawing. The charter school will maintain detailed records of the enrollment lotter process, including documentation of the lotter drawing, witness names, and all communication with families of the students.
8. **Return to Zoned School:** Students who do not meet the criteria or unable to attend due to capacity fulfilment will be returned to the District for assignment at his/her zoned school. Students who are enrolled in a CCA school may also be returned to their zoned school as a consequence for excessive behavioral issues after going through the standard District disciplinary process.
9. **Policy Review & Legal Compliance:** CCA will review this policy to ensure it remains

compliant with applicable laws and regulations and continues to meet the needs of affiliated schools. This will include seeking legal counsel to ensure this admissions and enrollment policy complies with all local, state, and federal laws governing charter school enrollment.

10. **Public Access:** All CCA policies will be made available to the public via the CCA website and available upon request.

---

# FINANCIAL MANAGEMENT AND OVERSIGHT POLICY

---

*Effective: July 25, 2022*

## **POLICY STATEMENT:**

Clear Choice Academies (CCA) is committed to upholding the highest standards of integrity, transparency, and fairness in financial management and oversight. This policy outlines the principles and guidelines to ensure employees, officers, and/or agents of Clear Choice Academies, its schools, affiliates, and subsidiaries, who engage in the selection, award, and administration of federal or state funded contracts will maintain impartiality, avoid potential conflicts of interest, and uphold an ethical financial management process.

## **1. FINANCIAL MANAGEMENT**

- A. The CCA Finance Committee shall consist of the Treasurer, who will serve as the Finance Committee Chairperson, and a minimum of two other members of the Board as appointed by the Board Chairperson. If the Board Chairperson determines additional members are necessary, other non-Board members may be selected to serve on the Committee.
- B. The Treasurer is the Comptroller and Chief Financial Officer (CFO) for the organization and responsible for authorizing all expenditures of CCA funds. All financial management will comply with the accounting requirements of the Financial and Program Cost Accounting and Reporting for Florida Schools (FPCAR “Red Book”) and applicable Florida statutes.
- C. The day-to-day financial management and all receipts and disbursements will be made by the on-site Bookkeeper, employed by CCA, and recorded and reported by an EA/Accountant engaged on contract by the School. The EA/Accountant will be responsible for compliance with all Federal and Florida statutes and Florida Department of Education financial management requirements for reconciling all financial documents.
- D. All contracts must be approved through the Board of Directors and signed by the Board Chairperson, and may be ratified as needed.
- E. CCA will maintain a single bank checking account for all general CCA funds, and each school will maintain a single bank checking account for general school funds. The Treasurer will maintain separate sub-accounts within the bank checking accounts to control the management of restricted funds. CCA will maintain a second bank account that will be used only for receiving electronic payments and cash deposits received from online purchases or payment transactions through an approved secured merchant account, to avoid risking unauthorized access to CCA’s general account. The Bookkeeper will transfer all but \$100 to the CCA general account from the secondary account, as needed.
- F. The only persons authorized to sign checks on the CCA bank account will be the Treasurer, a Chairperson-appointed Board Director, and the CCA Executive Director. All checks, over \$750 must be signed by two of these individuals. Checks below \$750 may be signed by one individual check signer. When signing checks, those signing will ensure that the documentation specified in

paragraph 3(C) is attached. Additional documentation may be required by the check signers, prior to signing.

G. CCA may use only the following credit and/or debit cards:

1. One credit card with a \$500 limit that may be used anywhere (e.g. Visa, MasterCard, American Express, etc.)
2. Multiple credit cards with a \$1000 limit each that may be used at only one place of business (e.g. Lowes, Staples, Office Depot, etc.).
3. A single debit card, attached to the CCA general fund bank account will be secured in the possession of the Bookkeeper. This debit card shall be used only for internet transactions and incidental purchases, not to exceed \$300 without prior approval from the Executive Director and either the Treasurer or Board Chairperson through a written Request for Disbursement form.

H. The Bookkeeper (or EA/Accountant) and Treasurer will provide to the Board, a copy of the General Ledger from the first day following the preceding board meeting until the Friday prior to the next scheduled board meeting. The Treasurer will report to the Board of Directors a narrative explanation of financial activity since the previous board meeting, reconciled financial reports for the preceding period, and current adjusted budget status summary.

## **2. BUDGET**

- A. The annual budget for CCA will be approved by the CCA Board of Directors. It will be developed by the Treasurer and Executive Director, and approved by the Finance Committee, before presentation to the Board of Directors. It will be presented to the Board for approval at the first regularly scheduled annual Board meeting in July. The budget will be revised and updated if there is a reduction of more than 3% of the FEFP funding.
- B. The budget will be a line item budget based on zero-based budgeting principles. The budget may include a line item for contingency funding of expenses that are unforeseen.

## **3. DISBURSEMENT CONTROL**

- A. No obligation of CCA funds may be made by anyone without prior approval by the Treasurer. The Treasurer will not approve the disbursement of any funds not itemized in the annual budget without the approval of the Board of Directors. The Bookkeeper will maintain a log of the date, amount and description of obligations approved by the Treasurer's signature. In the absence of the Treasurer, the Board Chairperson will approve disbursement of funds.
- B. All disbursements will follow and document the following stepwise procedures. All certifications will bear the date and signature of the certifying official:
  1. All bills or other requests for the disbursement of funds will be made to the CCA Executive Director who will certify that the expense is a valid and legitimate requirement for the school, and that it is within the Board-approved budget.

2. The Executive Director will forward all bills or other requests for the disbursement of funds to the Bookkeeper as follows:
  - a) The Bookkeeper will maintain a listing of all regularly occurring on-line electronic transfer expenses that have been certified by the CCA Executive Director and the Treasurer as valid and legitimate requirements for the school, and that are within the Board approved budget.
  - b) Items and expenses not on this listing must be individually approved by the CCA Executive Director and the Treasurer or Board Chairperson before an on-line electronic transfer is executed or a payment check is written.
- C. The Bookkeeper will identify the sub-account from which the disbursement is to be made and the “Red Book” functions and object codes for that expense; and will prepare the check and package it with the required documentation. All checks and on-line payments will be documented with a receipt, bill of lading, invoice, or memorandum of record (MOR) that itemizes the items purchased or service performed, the approving authority, the details about when and where the item(s) were delivered or services that were performed; and will be signed by the school employee receiving the items or service as confirmation of receipt.
- D. Requests for reimbursements of expenses incurred on behalf of CCA will be made through the Executive Director and Treasurer to the Bookkeeper in that order using the Request for Reimbursement form, attached.

#### **4. CASH MANAGEMENT**

- A. The EA/Accountant will not handle cash or checks for the School. These items will all be accounted for separately by the Bookkeeper as follows:
  - 1) Activity fees – the student or parent will be provided a receipt slip and the student’s name will be listed;
  - 2) School uniform sales – the student or parent will be provided a receipt slip and the student’s name will be listed;
  - 3) Fundraiser sales – the name of the purchaser will be listed.
- B. The information from these records will be provided to the Bookkeeper for incorporation into the Quickbooks accounting system, and the records will be retained until after the annual audit for that period.
- C. These funds will be physically deposited into the bank account by the CCA Executive Director, or the Treasurer.
- D. Petty cash will be handled as specified by the contract EA/Accountant in accordance with FPCAR and Quickbooks.

#### **5. CONTRACT AND GRANT MANAGEMENT**

- A. Contract and Grant management is a shared responsibility between the Board of Directors and the CCA Executive Director, as follows:
  - 1) The Board of Directors approves in advance all decisions to enter into contracts and apply for grants.
  - 2) The CCA Executive Director, with assistance from appropriate Board and staff members, negotiates and drafts contracts. CCA shall not enter into cost-plus contracts.
  - 3) The Board of Directors approves the contract.
  - 4) The Chairperson of the Board of Directors will sign the contract on behalf of the Board. No contract is binding upon CCA unless both approved by the Board and signed by the Chairperson.
- B. The CCA Executive Director is responsible for administering all contracts. He or she may delegate some monitoring and accounting responsibilities to his or her staff; but retains the responsibility to ensure that all terms of contracts and grants are followed. He or she makes sure the parties employ due diligence to comply with the terms, conditions, rights and obligations of the contract.
- C. Monitoring and tracking performance over the course of the contract may be accomplished through the use of electronic document management systems and spreadsheets.
- D. As part of the monitoring process, the contract Executive Director inspects goods when delivered to make sure the delivery is per the agreement. Items and property acquired through a contract or grant will be monitored and managed in accordance with the instructions in sections 6 and 7 of this document.
- E. The CCA Executive Director also coordinates any changes to the agreement that might occur over the course of the contract and performs the closeout process when all parties to the contract have met their obligations. Significant changes in contract terms will be coordinated with the Board of Directors.

## **6. PROPERTY CONTROL**

- A. A school staff member will be designated as the “Property Custodian.” The Property Custodian will be nominated by the CCA Executive Director and approved by the Board of Directors. The Property Custodian will establish a “Property File” in a spreadsheet format. The Property File will contain the following information on each item:
  - 1) Item description
  - 2) Item inventory number
  - 3) Date acquired
  - 4) How acquired
  - 5) Acquired from
  - 6) Purchase price or value when acquired
  - 7) Date when last inventoried.

- B. All items that are not consumables and that are purchased for or valued at \$50.00 or more, or purchased with Grant funds, will be listed in the Property File. All items in the Property File will be inventoried annually within the first 3 months of the academic year (July through September), or upon the change of the Property Custodian. Items procured with Grant funds will be identified as such and controlled with a unique inventory number.

## **7. CONSUMABLES CONTROL**

- A. A school staff member, other than the Property Custodian, will be designated as the “Consumable Accountant”. The Consumable Accountant will be nominated by the Executive Director and approved by the Board of Directors. Item description
- B. The Consumable Accountant will establish a “Consumable File” in a spreadsheet format. The Consumable File will contain the following information on each consumable:
  - 1) Date acquired
  - 2) Quantity acquired
  - 3) Acquired from
  - 4) Purchase price
  - 5) Date when totally expended.

## **8. HUMAN RESOURCES ACCOUNTING**

- A. Payroll services will be conducted through Intuit and processed by Bookkeeper as coordinated by the Executive Director or HR designee.
- B. The line item budget input will specify the amount available for each individual employee’s salary. The Executive Director has the authority to establish salary ranges within the budget. The Executive Director may not spend more for staff salaries than the budgeted amount without advance approval from the Board of Directors.
- C. The CCA Executive Director will negotiate his or her contract with the Chairperson of the Board. All other staff members will be employed in regular status or contracted for services as determined by job function and duties assigned.
- D. All employee contracts will be ratified by the Board of Directors.
- E. Employee timekeeping and personnel files will be managed by the designated HR Representative. Clear Choice Academies has contracted with BambooHR to manage and safekeep electronic employee data, including timekeeping and personnel information.

## **9. OFFICIAL TRAVEL**

- A. Official travel by the CCA Executive Director outside the local area will be approved in advance by the Board of Directors. Other employees may perform official travel outside the local area when the travel is directed or authorized in advance by the CCA Executive Director. The CCA Executive Director will authorize travel by personal vehicle or commercial common carrier (commercial plane, train, etc.), whichever is most cost effective. Within fourteen (14) days after completion of



travel, the employee will submit a travel report narrative describing the purpose and the result of the travel. The travel receipt will be signed by the traveler and certified by the Executive Director before being presented to the Bookkeeper for payment.

- B. Travel expenses for which the traveler submits original receipts will be paid as follows:
- 1) The standard government rate for the Google map mileage from the school to the travel destination and return, except that travelers who receive a gratuitous ride from another traveler will not be reimbursed for transportation mileage. Operation and maintenance expenses for personal vehicles will not be reimbursed.
  - 2) Cost for economy class travel on commercial common carriers, accompanied by original receipts;
  - 3) Registration fees, if applicable, supported by a paid receipt (for authorized travel, the traveler may ask CCA to pay registration fees in advance);
  - 4) The standard government per diem for meals and lodging. The travel day consists of four quarters. The traveler shall be reimbursed the rate for each  $\frac{1}{4}$  day of approved travel. If actual expenses exceed the per diem rate, the traveler may request reimbursement for actual expenses for lodging and meals in lieu of per diem. An original receipt for lodging at a single-occupancy rate will be reimbursed, plus expenses for meals at the standard per diem rate.
- Exception: No one shall be reimbursed for any meal or lodging included in a convention or conference registration fee paid by the school.**
- C. All travel issues cannot be covered in this short summary. For questions about official travel not answered in this document, FL Statute 112.061, Per diem and travel expenses of public officers, employees, and authorized persons shall be consulted.

## 10. VENDORS

Vendors not on a contract who provide goods and services to the school in multiple areas or expense categories will provide an invoice that itemizes and clearly identifies by description the FPCAR function and object code applicable to the charges being billed. The Bookkeeper will assist the vendor in the preparation of the initial invoice.

All vendors must adhere to and follow the CCA Purchase Order and Vendor Application Terms and Conditions, as established by the Board of Directors and compliant with Marion County Public Schools.

## 11. FUNDRAISING

- A. All fund-raising efforts, requiring advance funding by CCA, must be approved by the Board of Directors. The request for Board approval will be accompanied by a detailed line-item budget of the advance funding required.
- B. Upon completion of the fund-raising efforts, a detailed line-item accounting must be presented to the Board, listing revenues and expenditures, and suggestions for future endeavors.

---

## INTERNET SAFETY POLICY

---

*Effective: July 1, 2023*

### **POLICY STATEMENT:**

Clear Choice Academies, Inc. (the “School”) recognizes the value of electronic devices and the internet to improve student learning and enhance school administration and operations. However, the internet is an unregulated vehicle for communication, and information and interactions on the internet can pose certain risks to students and staff members. Therefore, the Governing Board adopts this policy governing the use of school networks to comply with Florida law and State Board of Education rules, and to provide rules for students and employees accessing such networks.

**1. General Requirements for Users.** It is the policy of the School to maintain an environment that promotes ethical and responsible conduct in all online network activities by staff and students. It shall be a violation of this policy for any employee, student, or other individual to engage in any activity that does not conform to the established purpose and general rules and policies of the network. Users on any network operated by the School shall comply with the following requirements:

- a) All use of a network must be in connection with education and research, or in the case of employees, related to the employee’s job functions.
- b) Users shall not access any content that is prohibited under this policy or under the law.
- c) Users are prohibited from using the School’s networks for any illegal or unethical purposes, including infiltrating or hacking the School’s systems or any outside systems.
- d) Users shall not utilize the School’s networks for personal gain or personal business.
- e) Users shall not install any unauthorized software or programs on any School-owned electronic device or network.
- f) Users shall not destroy, delete, or modify any School-owned devices or software unless authorized to do so.
- g) Users shall not utilize the School’s networks to engage in harassment, discrimination, cyberstalking, cyberbullying, or obscene behavior.
- h) Users will avoid clicking unknown links or accessing webpages and other content that may contain malware, spyware, ransomware, or other malicious software.
- i) If any user accesses prohibited content or downloads potentially malicious software, the individual must immediately report the incident to their teacher, in the case of students, or to the Principal, in the case of staff members.

**2. Requirements for Student Users.** The following requirements apply to the use of the School’s networks by students:

- a) Student internet and technology sessions must always be supervised by a teacher or other staff member.
- b) Students may only use technology or access the internet when expressly instructed by a teacher for educational purposes.
- c) Staff members who supervise students, control electronic equipment, or otherwise have occasion to observe student use of school-provided technology or internet access shall

make reasonable efforts to monitor student use to assure that it conforms to the requirements of this policy and the law.

- d) Staff must make reasonable efforts to become familiar with the internet and its use so that effective monitoring, instruction, and assistance may be achieved.

3. **Prohibited Uses.** It is strictly forbidden for any users to access online content that is lewd, pornographic, scandalous, obscene, illegal, hateful, objectionable, inappropriate, or that otherwise does not comply with the requirements of this policy.
4. **Social Media Platforms.** As a general rule, the School's networks may not be used by any person to access social media platforms. In limited circumstances, students may be permitted to access social media platforms when expressly directed by a teacher to do so and solely for educational purposes. Staff members may also access social media accounts that are maintained on behalf of the School and related to the staff member's job duties. Prior to requiring students to use online content, staff must confirm that the content is not blocked by the student internet filter. Staff may make a request to their supervisor that blocked content or social media platforms be reviewed and temporarily unblocked for educational purposes. Notwithstanding the foregoing, under no circumstances may any employee or student access TikTok or any other platforms prohibited by Florida's Department of Management Services while on school grounds or participating in a school activity. Additionally, the use of TikTok to communicate or promote the School, a School-sponsored club, extracurricular organization, or athletic team is prohibited.
5. **Online Messaging Platforms.** Students are only permitted to utilize sanctioned email, chatrooms, and online messaging platforms while at the School or as part of School activities and only when permitted by a staff member as part of the educational program. Students should be made aware of the potential dangers posed by communicating with unknown individuals on the internet and such communications are strictly prohibited.
6. **School's Responsibilities.** In order to ensure network safety and enforce the provisions of this policy, the School's administration will implement the following measures:
  - a) Provide internal and external controls as appropriate and feasible that restrict access to content, including implementing a network filtering system that is designed to block access to prohibited or restricted content on the School's networks and on any School-issued device. Access to content should be limited to age-appropriate subject matter and materials. Access to websites, web or mobile applications, or software that does not protect against the disclosure, use, or dissemination of students' personal information in accordance with Rule 6A-1.0955, F.A.C., will be prevented.
  - b) Monitor the use of online activities and electronic devices. This may include real-time monitoring of network activity and/or maintaining a log of internet activity for later review.
  - c) Remove or revoke privileges for any user that poses a threat to the safety and security of the network or to any person.
  - d) Retain the ability to remotely remove any prohibited application from any School-issued device.
  - e) Restrict access to social media platforms, applications prohibited by the Department of Management Services, and any other destination that does not adequately protect student information.

- f) Make reasonable efforts to train staff and students in acceptable use and policies governing use of the School's networks and devices.
  - g) Contract only with service providers and operators of websites, online services, or online applications that comply with all state and federal laws governing the disclosure of confidential student information.
- 7. Violations.** Use of electronic devices and networks provided by the School is a privilege. To maintain the privilege, all users agree to learn and comply with the provisions of this policy. Violations of this policy may result in revocation of network access rights and further disciplinary action. Students that violate this policy will be disciplined in accordance with the Code of Student Conduct. Staff members that violate this policy will be subject to disciplinary action up to and including termination. Any criminal activity will be reported to law enforcement.
- 8. Parental Notification.** A copy of this policy shall be made available on the School's website and incorporated into the School's Parent & Student Handbook to fully inform parents.

---

## **INVENTORY CONTROL POLICY**

---

*Amended: October 9, 2023*

### **PURPOSE:**

The Board of Directors acknowledges the need to manage unneeded, inoperable, or obsolete property effectively to prevent the unnecessary use of valuable storage space. This policy aims to facilitate the efficient disposal of such property, thereby averting future unnecessary expenses associated with handling and storage.

### **AUTHORITY**

Upon determining that any personal property or equipment has become surplus or obsolete, the Board of Directors grants authorization for such items to be sold, exchanged, donated, or disposed of in accordance with the following guidelines:

- The property or equipment is no longer essential for its original intended purpose.
- The property or equipment is outdated, unusable, or obsolete.
- The property or equipment is in quantities that surpass any potential effective utilization within Clear Choice Academies.

### **DELEGATION OF RESPONSIBILITY**

The Executive Director and/or designated personnel, as per this policy's requirements, shall assess whether any of the stipulated criteria apply to property owned by CCA. If necessary, this responsibility may be delegated, ensuring adherence to the policy's provisions.

The Executive Director or designated personnel are accountable for identifying all school-owned equipment and property that is obsolete, unusable, in excess quantities, replaced, or otherwise lacking value to the school or organization. If needed, additional staff may be involved to establish criteria aiding in this identification.

### **GUIDELINES**

#### **Inventory Control:**

1. A full inventory of all purchased property (including property purchased by federal funding (CSP or other grant)) must be conducted twice yearly.
2. All inventory must be logged and labeled upon receipt. The school's inventory report must include the following:
  - Item number
  - Item description
  - Funding source
  - Acquisition date
  - Cost
  - Location/Room #
  - Condition
  - Disposition Date

3. All CSP purchased property with 600 object codes must be tagged with the following:
  - Property of [District/School Name]
  - Inventory Item ID/Serial Number
  - Purchased with CSP Grant Funds

**Methods of Disposal:** Items with some value may be disposed of using the following methods:

- Public sale or auction.
- Sale of salvage scrap to local dealers.
- Negotiated sale.
- Request for proposal approach for items with significant value or unique attributes.
- Pre-priced sale (suitable for sizable quantities of obsolete or surplus furniture and equipment).
- Trade-in when acquiring new equipment.
- Donation to charitable organizations, non-profits, or other schools.
- Environmentally responsible disposal or recycling following applicable regulations.
- Utilization of electronic auction platforms, including but not limited to, Municibid, eBay, and Public Surplus.

Disposal options encompass activities like part dismantling, recycling, donation, or resale to authorized vendors. In instances of equipment replacement, trade-ins may be integrated into the acquisition process.

Items lacking sale value or where disposal surpasses net worth can be donated to charitable organizations, non-profits, other schools, or properly discarded, with the exception of items funded by CSP or other federally funded grants (when applicable).

## **REAL ESTATE**

This policy does not extend to the disposition of real estate.

## **RECORDKEEPING**

The Executive Director or designated personnel will uphold records of all disposed obsolete and surplus property during each fiscal year. This record will encompass details such as quantity, property description, disposition method, and received value. Such records will be maintained for a minimum of three (3) years.

---

## NAME DEVIATION REQUEST POLICY

---

*Effective: July 1, 2023*

### **POLICY STATEMENT:**

This policy adopted by Clear Choice Academies, Inc. (the “School”) provides the procedures for a student to be called a name other than the name on their birth certificate. The School will abide by all laws and administrative rules concerning student records, as they are amended from time to time.

1. **Procedures.** Pursuant to Florida Administrative Code Rule 6A-1.0955, Education Records, A parent or legal guardian that seeks to change the name of a student already enrolled in the School must submit the Name Deviation Request form, providing consent for their child to use an alternate name at school. A Parent may obtain a Name Deviation Request Form by requesting a copy from the School. The Parent must return the form either in person to the front office, or by e-mailing a signed copy to the appropriate school in which their child is enrolled.

The School retains discretion to decline to use a name not appearing on a student’s birth certificate notwithstanding a Name Deviation Request for any reason. Name Deviation Requests must be school-appropriate and reasonable. The School may request a meeting with the parent or legal guardian to discuss a Name Deviation Request. Name Deviation Request decisions made by the School are final.

2. **Parental Notification.** This policy shall be incorporated into the School’s Student & Parent Handbook to properly inform Parents.

---

## **PARENT AND FAMILY ENGAGEMENT POLICY**

---

*Effective: July 1, 2020*

### **PURPOSE:**

Clear Choice Academies (CCA) is dedicated to delivering a high-quality education to every student. To achieve this goal, we are committed to fostering strong partnerships with parents and families. Collaborative efforts between parents, families, and educators enhance student achievement and cultivate positive attitudes towards self and school. Teachers will ensure parents are informed about grade-level learning objectives, and all students are expected to work towards mastering these goals. Acknowledging that some students may require additional support to reach their fullest potential, CCA offers assistance through the Title I program.

At Clear Choice Academies, parents are integral to all aspects of the Title I program, empowering students with ample opportunities for success through the strengthening of the home-school partnership. We are dedicated to making provisions for the participation of parents with limited English proficiency, parents and families with disabilities, and parents and families of migratory children, ensuring that information and school reports are accessible in a uniform format, in the preferred language of parents, upon request.

Clear Choice Academies adheres to the following statutory definition of Parental and Family Engagement and is committed to implementing programs, activities, and procedures in accordance with this definition:

Parent and Family Engagement refers to the active involvement of parents in two-way communication related to student academic learning and other school activities, aiming to ensure:

- Parents and families play a vital role in supporting their child's education.
- Parents and families are encouraged to actively participate in their child's educational journey.
- Parents and families are equal partners in their child's education, contributing to decision-making and advisory committees.
- Other related activities are carried out.

### **PARENT AND FAMILY ENGAGEMENT POLICY DEVELOPMENT**

Parents, families, community members, and school staff will convene to discuss the formulation and execution of the Parent Engagement Policy. CCA will employ diverse communication methods to encourage participation, informing parents about Title I guidelines and distributing copies of the Parent and Family Engagement Policy. Parents are encouraged to actively contribute to refining and updating the policy as needed. Meetings will be arranged at convenient times and locations, alternating between the end of the school day and evenings.

Clear Choice Academies, in collaboration with parents and families, will conduct an annual evaluation through surveys to assess the content and efficacy of this parent and family engagement policy in enhancing school quality. The evaluation will identify barriers to increased parental and family involvement, with specific attention to economically disadvantaged parents, those with disabilities, limited English proficiency, limited literacy, or from racial and ethnic minority backgrounds. The insights from this evaluation will be used to design strategies for more effective parent and family engagement



and, if necessary, revise the engagement policies in partnership with parents and families. This qualitative evaluation will involve ongoing dialogues with parents to tailor the school's growth and development to best serve each student's needs. The administrative team will gather input, feedback, and recommendations from parents to guide the policy review.

### **SCHOOL/PARENT AND FAMILY/STUDENT COMPACTS**

In accordance with Title I regulations, CCA will develop a parent/student compact in collaboration with parents of participating students. This compact delineates shared responsibilities between the school and parents for promoting student performance and success. Copies of the compact, outlining the roles of teachers, parents, and students in achieving educational goals, will be distributed to all parents. Parents are encouraged to discuss the compact's contents with their child.

Diverse Approaches to Parent and Family Engagement – Clear Choice Academies values both home-based and school-based parent and family engagement. A variety of involvement methods are essential for a successful home-school partnership that benefits all students.

Opportunities for Parent and Family Engagement encompass:

- Supporting their child's learning at home.
- Volunteering in the classroom (with proper clearances).
- Assisting with field trips and other activities.
- Participating in Parent/Teacher conferences throughout the year.

### **PARENT TRAINING**

To cater to the desires of parents, guardians, foster parents, and surrogate parents, an annual survey will be conducted to ascertain training needs. Efforts will be made to accommodate increased parental and family support and participation through flexible meeting scheduling (e.g., varying times, conference calls). Notifications about meeting dates, times, and objectives will be communicated via hard copies, parent portals, websites, and social media posts.

Clear Choice Academies will offer materials and training to empower parents in supporting their children's academic progress and promoting parent and family engagement. This includes hosting speakers, engagement activities, and addressing topics during Parent-Teacher Conferences or meetings linked to a child's individualized education plan.

CCA will ensure that information related to school and parent programs, meetings, and activities is shared with parents in a clear and uniform format. This includes alternative formats upon request and, as far as possible, in languages that parents can comprehend. Clear Choice Academies will gather information about parents' first language through the Home Language Survey, and parents whose first language is not English will be engaged to understand how best to support their successful transition and ongoing experience at the school.

### **VISITATION**

Upon entering the building, visitors are requested to sign the visitor sign-in sheet at the office. The administration and faculty at Clear Choice Academies aim to foster collaboration between home and school. To enhance the value of your school visit and ensure the safety of all students, we kindly ask parents, guardians, foster parents, and surrogate parents to schedule visits in advance, either through

phone calls or emails to a Principal. Visits will last approximately 30 minutes, depending on the teacher's class schedule. All visitors must sign in at the office and provide valid identification. Visitors are expected not to disrupt the classroom, and if a disruption occurs, they may be requested to leave.

---

## PROCUREMENT POLICY AND ETHICAL STANDARDS

---

Revised: November 2023

### POLICY STATEMENT:

This policy outlines the guidelines and procedures to ensure transparency, fairness, and ethical conduct in the competitive bidding process for vendors seeking contracts with CCA or its affiliated schools (hereinafter referred to as "Organization"). The Organization is committed to upholding the highest standards of integrity and preventing conflicts of interest throughout the vendor selection process.

### ARTICLE 1: CONFLICTS OF INTEREST

2. **Definition of Conflict of Interest:** A "Conflict of Interest" arises when individuals involved in the vendor selection process have personal, financial, or other interests that may compromise their objectivity, impartiality, or the integrity of the process.
3. **Disclosure of Conflicts:** Any individual (Interested Persons), including but not limited to Organization employees, board members, or committee members, who have a potential conflict of interest related to a vendor or the competitive bidding process, must promptly disclose such conflicts in writing to the Board of Directors, who will determine if there is a conflict of interest as detailed in the *Conflict of Interest and Anti-Nepotism Policy*.
4. **Recusal and Non-Participation:** Interested Persons with disclosed conflicts of interest shall be recused from any involvement in the vendor selection process related to the conflicted vendor. They shall not participate in discussions, evaluations, Board deliberations, or decision-making regarding that vendor's contract.

This policy prohibits Board members and immediate family members from having an employment or contractual relationship with any business entity doing business with the Organization, unless the business is obtained through a competitive bidding process (below).

This policy prohibits Interested Persons from participating in the selection, award, or administration of any contract supported by Federal funds if:

1. The decision is likely to benefit that person or his/her immediate family member;
2. The person is a public official or has a familial or business relationship with the Organization (grantee);
3. If a real or apparent conflict of interest exists.

Competing contractors participating in the bidding process would be excepted.

4. **Prohibition of Unfair Practices:** The Organization strictly prohibits any form of bribery, collusion, or unethical practices by vendors during the bidding process. Violations may result in disqualification and legal action. This includes, but is not limited to:
  - Offering “kick-backs,” bribes, or incentives to Interested Persons of the Organization;
  - Threatening acts of violence, disparagement, punishment, retribution, retaliation, or other threat to representatives of the Organization or competing bidders;
  - Providing fraudulent or inaccurate information, hidden fees or price escalations without disclosure, undisclosed relationships with Interested Persons, etc.

Other prohibitions and Conflicts of Interests are detailed in the *CCA Policy Manual: Conflict of Interest and Anti-Nepotism Policy*.

## **ARTICLE 2: COMPETITIVE BIDDING PROCESS**

**Fair and Open Competition:** The Organization is dedicated to upholding the principles of fair and open competition in the vendor selection process. Every qualified vendor shall be afforded an equal opportunity to submit bids and compete for contracts. The Organization will adhere to guidelines and standards set forth by the District and the Florida Department of Education (FLDoE) in all procurement endeavors.

**Development and Evaluation of Bid Specifications:** Bid specifications will be crafted without bias or undue influence from any interested parties. Evaluation criteria will be transparent, objective, and communicated clearly to all potential vendors.

**Promoting Fair Competition:** Our procurement transactions will actively promote full and open competition in alignment with District and FLDoE standards. This includes prohibiting any actions that hinder or obstruct fair competition, such as imposing unreasonable requirements, engaging in noncompetitive pricing practices, awarding contracts solely to consultants on retainer, specifying brand-name products without valid justification, or making arbitrary decisions during the procurement process, such as awarding contracts to vendors not ranking first according to the Organization's evaluation criteria, without a valid reason.

**Prohibition of Incentives:** Incentives that may unduly influence or induce involvement in the selection, award, or administration of contracts are strictly prohibited. To maintain the highest level of integrity and ensure the Organization's reputation remains untarnished, employees, officers, and agents must not accept any incentives that could compromise the decision-making process. This prohibition includes gifts, monetary incentives, scholarships, redeemable points, goods, or services. *See Conflict of Interest and Anti-Nepotism Policy.*

**Reporting and Oversight:** Any complaints or irregularities related to the Organization's

procurement activities must be promptly reported to the Governing Board or the FLDoE. Oversight responsibilities encompass reviewing compliance with this Code of Conduct, ensuring transparency, and taking corrective actions when necessary. Corrective actions may involve a thorough review, investigation, or appropriate consequences.

#### **CONSEQUENCES:**

We are unwavering in our commitment to upholding ethical standards, fostering fair competition, and maintaining the utmost transparency throughout all procurement processes. Violations of this policy will be met with consequences as prescribed by relevant laws and regulations.

1. **Reporting Procurement Concerns:** Any complaints or irregularities pertaining to the procurement of goods and services must be promptly reported to either the Governing Board or the FLDoE. This reporting encompasses the actions and conduct of individuals and organizations involved in soliciting, awarding, and administering contracts. The Governing Board and/or FLDoE may conduct oversight activities, including a comprehensive review of this written code of conduct and its application to relevant parties.
2. **Consequences for Non-Compliance:** Failure to comply with our policies may result in various consequences, including but not limited to:
  - Withholding of cash payments
  - Suspension of program funding
  - Denial of all or part of the cost associated with noncompliant activities
  - Other remedies as determined appropriate by the state agency
  - Termination of contracts

Additionally, non-compliance can lead to civil or criminal penalties, legal actions, and bid protests, which can erode public trust.

3. **Responsibility of All Personnel:** Every employee, officer, and agent of Clear Choice Academies, as well as its subsidiaries or affiliates, involved in procurement activities with the organization, bears the responsibility of ensuring that their conduct aligns with all applicable laws, program instructions, and guidance materials. Any member of Clear Choice Academies found in violation of the aforementioned code of conduct will face disciplinary measures, which may include suspension or termination.

### **ARTICLE 3: PURCHASING POLICY**

#### **Micro-Purchases**

Micro-purchases refer to the procurement of supplies or services using simplified acquisition procedures, where the total amount does not exceed the micro-purchase threshold of \$10,000.

To ensure compliance with the regulations, the following guidelines must be followed for all micro-purchases:

- All single-visit transactions must remain under \$10,000.
- The aggregate limit of similar purchases should not exceed \$10,000.
- Procurements must be distributed equitably among all qualified sources.
- Prices of purchases must be reasonable and justifiable.

In the event of repeated purchases, the Small or Formal Purchase procedures must be utilized instead of multiple micro-purchases. The following steps should be followed:

- Proper documentation of each bidder's quoted price is mandatory.
- The lowest responsive and responsible bidder must be selected.
- All bidders must be informed of the award in writing.
- A contract must be established with the awarded bidder.

### **Mid-Purchase Procedures**

Mid-purchase procedures refer to simple and informal procurement methods for securing services, supplies, or other property that do not exceed the Simplified Acquisition Threshold. These procedures include:

- Providing at least three (3) quotes for purchases over \$10,000 and up to \$250,000.
- Documenting each bidder's quoted price.
- Selecting the lowest responsive and responsible bidder.
- Informing all bidders of the award in writing.
- Establishing a contract with the awarded bidder.

### **Major Purchases**

Purchases exceeding the threshold of \$250,000 must undergo a rigorous process to ensure transparency and compliance. The following steps should be taken:

- Conducting an open-bidding process (RFP) allowing contractors/vendors to submit proposals based on a specific scope of work (SOP).
- Providing a detailed description of services, materials, costs, and timeframes for completion.
- Setting a deadline that allows adequate review by the Board.
- The Board will review all submitted proposals and select the lowest responsive and responsible bidder during a regularly scheduled or special meeting.
- Informing all bidders of the award in writing.
- Establishing a contract with the awarded bidder.
- Assigning the Executive Director, Director of Operations, or another manager to oversee the management and completion of the contract, providing ongoing status updates to the Board.

### **Sole-Source Purchases**

Procurement by noncompetitive proposals involves the solicitation of a proposal from a single source. All sole-source procurements require adequate written justification that meets the criteria listed below and documentary support in the procurement file to be allowable. Sole-source procurement justifications should only be pursued if it is determined that the awarding of a contract through a competitive process is unfeasible or impractical.

Recipients may conduct noncompetitive (“sole source”) procurement through solicitation of proposals from only one source when one or more of the following circumstances apply:

- The item/service is exclusively available from one source.
- The public exigency or emergency for the requirement will not permit a delay caused by competitive solicitation.
- Competition is deemed inadequate after solicitation of a number of sources.

When submitting a sole-source request to the BOARD, the following items must be included for proper documentation:

- A concise project description, the designated amount for the sole source procurement, the contract’s purpose, and an itemized budget for the contract amount,
- An explanation as to why it is necessary to contract in a non-competitive manner,
- A declaration that this action/choice is in the best interest of the school or organization.

This procurement policy will be reviewed annually to ensure its effectiveness and compliance with any new regulations that may be introduced. All employees involved in the procurement process must adhere to this policy to maintain the highest standards of transparency and integrity.

---

## PROTECTION OF STUDENT INFORMATION POLICY

---

*Effective: August 1, 2023*

### **POLICY STATEMENT:**

This is the Policy on Protection of Student Information in Connection with Online Educational Services of Clear Choice Academies, Inc. (the "School"). This policy is implemented to comply with the requirements of Rules 6A-1.0955(9) and 6A-1.09550, Florida Administrative Code, the Family Educational Rights and Privacy Act ("FERPA"), the Children's Online Privacy Protection Act ("COPPA"), and other applicable laws.

### **1. Definitions.**

- a. "Applicable Laws" means FERPA, COPPA, 15 U.S.C. §§ 6501-6506, Section 1002.22, Florida Statutes, all other applicable Florida Statutes, and all applicable administrative rules.
- b. "Education records" means records that are directly related to a student and that are maintained by the School as defined in 20 U.S.C. s. 1232g(a)(4).
- c. "Eligible student" means a student who has reached eighteen (18) years of age.
- d. "Online educational service" means computer software, mobile applications (apps), and web-based tools that students or parents are required to use and access through the internet and as part of a school activity or function. Examples include online services that students or parents use to access class readings, assignments, or videos, to view learning progression, or to complete assignments. This does not include online services that students or parents may use in their personal capacity or to online services that the School may use to which students or parents do not have access, such as a student information system.
- e. "Parent" includes parents or guardians of students who are or have been in attendance at the School.
- f. "Personally identifiable information" or "PII" means information that can be used to distinguish or trace a student's identity either directly or indirectly through linkages with other information, as defined in 34 CFR §99.3. PII includes, but is not limited to, direct identifiers (such as a student's or other family member's name), indirect identifiers (such as a student's date of birth, place of birth, or mother's maiden name), and other personal identifiers (such as a student's social security number or Florida Education Identifier (FLEID) number). PII also includes information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty.
- g. "Student" means any individual who is or has been in attendance at the School and regarding whom the School maintains education records.
- h. "Third-party vendor" or "Third-party service provider" means any entity, whether public or private, that provides services to the School through a contract or agreement. The term does not include the Florida Department of Education, the Department's contractors and subcontractors, or School Boards and School Districts.

2. **Purpose.** This policy is intended to protect the personally identifiable information ("PII") of students when students are required to use online educational services, including to provide protections



against potential misuse of PII, data mining, or targeting for marketing and other commercial purposes.

- 3. Review of Online Educational Services.** All online educational services that students or their parents are required to use as part of school activities must be reviewed and approved as described herein, regardless of whether the online educational service is free, whether use of the online educational service is unique to specific classes and courses, or whether there is a written agreement governing student use. The Principal or their designee must review each online educational service's terms of service and privacy policy to ensure compliance with state and federal privacy laws, including the Applicable Laws, and the requirements set forth in this policy. The Principal or designee must determine whether the online educational service provider will collect PII, how it will be used, when and how it will be destroyed, and the terms of re-disclosure, if any. Under no circumstances may an online educational service be used if such a service will share or sell student PII for commercial purposes (including, but not limited to, targeted advertising) without providing parents a means to either consent or disapprove.
- 4. Approval of Online Educational Service.** If a teacher or other employee at the School intends to utilize an online educational service as part of a school activity, they must first submit a request to the Principal or their designee for review and approval. No online educational service may be utilized for any school activity unless it has been reviewed and approved. Following the review described above, the Principal or their designee must approve or deny the use of the online educational service. The Principal or designee reserves the right to deny the use of any online educational service for any reason, including if the online educational service is determined to have policies or practices that could lead to the misuse of student PII or violate the Applicable Laws. The Principal or designee may also approve the use of an online educational service subject to parental consent, as described in more detail below. The Principal or designee will maintain documentation related to the approval or denial of all online educational services. Nothing herein is intended to supersede the authority of the Governing Board to approve the use of an online educational service to the extent such approval is required by any other policy of the School.
- 5. Contracts and Agreements.** All contracts or agreements executed by or on behalf of the School with a third-party vendor or a third-party service provider must protect the privacy of education records and student PII contained therein. Any agreement that provides for the disclosure or use of student PII must:

  - a. Require compliance with FERPA, its implementing regulations, and Section 1002.22, F.S.
  - b. Where applicable, require compliance with COPPA, 15 U.S.C. ss. 6501-6506, and its implementing regulations.
  - c. Where applicable, require vendors to ensure compliance with the Student Online Personal Information Protection Act, Section 1006.1494, F.S.
  - d. Ensure that only the PII necessary for the service being provided will be disclosed to the third party; and
  - e. Prohibit disclosure or re-disclosure of student PII unless the disclosure is authorized by FERPA, the disclosure is authorized by the School's directory information policy, and the disclosure is authorized by written consent of an eligible student or parent. Consent must include, at a minimum, an explanation of who the PII would be disclosed to, how it would be used, and whether re-disclosure is permitted.

- 6. Parental Notification and Consent.** Parents must be notified in writing if student PII will be collected by an online educational service, including what PII will be collected, how it will be used, when and how it will be destroyed, and the terms of re-disclosure, if any. This notification should be sent to parents at the beginning of the school year, or prior to students utilizing the online educational service if it is implemented after the start of the school year. If during the review process or at any time thereafter it is determined that an online educational service will share or sell student PII for commercial purposes, school personnel shall be strictly prohibited from allowing students to utilize the online educational service in any school activity without having first obtained written parental consent.
  
- 7. Notification.** For any online educational service that a student is required to use, the School will provide notice on its website of the PII information that may be collected, how it will be used, when it will be destroyed, and the terms of re-disclosure, if any. This notice will also include a link to the online educational service's terms of service and privacy policy, if publicly available. For online educational services that students and parents are referred to as part of a school activity or function, but are not required to use, the School must provide notice to parents and eligible students if such online services have not been reviewed and approved in accordance with this Policy.

---

## SCHOOL BATHROOMS, LOCKER ROOMS, & DRESSING ROOMS

---

*Effective: August 1, 2023*

### **POLICY STATEMENT:**

This is the Policy on School Bathrooms, Locker Rooms, and Dressing Rooms of Clear Choice Academies, Inc. and its affiliated schools (the "School"). This policy is implemented to comply with the requirements of Rule 6A-10.086, Florida Administrative Code, Section 553.865, Florida Statutes, and other relevant laws.

1. **Purpose.** This policy is intended to inform parents of how bathrooms, locker rooms, and dressing rooms are designated by the School, and to ensure the health, safety, and welfare of students when utilizing bathrooms, locker rooms, and dressing rooms.
  
2. **Policy.** Pursuant to Rule 6A-10.086(2)(a), Florida Administrative Code, all restrooms and changing facilities on campus are separated by Sex<sup>1</sup>. It is the policy of the School that all students, faculty, personnel, and guests of the School will use bathrooms, locker rooms, and dressing rooms that correspond with the individual's Sex. This means individuals whose designated sex at birth was male will be required to use those bathrooms, locker rooms, and dressing rooms designated for men, and individuals whose designated Sex at birth was female will be required to use those bathrooms, locker rooms, and dressing rooms designated for women. Individuals may also use single occupancy bathrooms that are gender neutral if available. Students are not permitted to utilize bathrooms that are designated exclusively for the school faculty. A person may only enter a restroom or changing facility designated for the opposite Sex under the following circumstances:
  - a. To accompany a person of the opposite Sex for the purpose of assisting or chaperoning a child under the age of 12, an elderly person as defined in Section 825.101 F.S., or a person with a disability as defined in Section 760.22 F.S. or a developmental disability as defined in Section 393.063 F.S.;
  - b. For law enforcement or governmental regulatory purposes;
  - c. For the purpose of rendering emergency medical assistance or to intervene in any other emergency situation where the health or safety of another person is at risk;
  - d. For custodial, maintenance, or inspection purposes, provided that the restroom or changing facility is not in use;
  - e. If the appropriate designated restroom or changing facility is out of order or under repair and the restroom or changing facility designated for the opposite sex contains no person of the opposite Sex.

In enforcing this policy, school personnel may reasonably rely upon representations made or documentation provided by the parent or guardian at initial enrollment, or such other records available to the administration. In the event of any inconsistency in the student's records, the administration reserves the right to request additional documentation from the parent or guardian to verify the

---

<sup>1</sup> "Sex" means the classification of a person as either female or male based on the organization of the body of such person for a specific reproductive role, as indicated by the person's sex chromosomes, naturally occurring sex hormones, and internal and external genitalia present at birth.

student's biological Sex at birth. This policy shall at all times be construed in accordance with state and federal law.

3. **Violations.** Pursuant to Section 553.865(9), F.S., instructional personnel or administrative who willfully enter, for a purpose other than those listed above, a restroom or changing facility designated for the opposite Sex on campus and refuse to depart when asked to do so commit a violation of the Principles of Professional Conduct for the Education Profession and are subject to discipline pursuant to Section 1012.795 F.S.

Any student who willfully enters, for a purpose other than those listed above, a restroom or changing facility designated for the opposite Sex and refuses to depart when asked to do so by instructional personnel, administrative personnel, or a safe-school officer will be subject to the disciplinary procedures provided in the Student Code of Conduct Discipline Guide.

Any person who willfully enters, for a purpose other than those listed above, a restroom or changing facility designated for the opposite Sex on campus and refuses to depart when asked to do so commits the offense of trespass as provided in Section 810.08 F.S. This paragraph does not apply to a student of the educational institution or to administrative personnel or instructional personnel of the educational institution. Trespassers will be immediately removed from campus and will be subject to applicable legal action.

4. **Exceptions.** This section does not apply to an individual who is or has been under treatment by a physician who, in his or her good faith clinical judgment, performs procedures upon or provides therapies to a minor born with a medically verifiable genetic disorder of sexual development, including any of the following:
  - a. External biological sex characteristics that are unresolvedly ambiguous.
  - b. A disorder of sexual development in which the physician has determined through genetic or biochemical testing that the patient does not have a normal sex chromosome structure, sex steroid hormone production, or sex steroid hormone action for a male or female, as applicable.
5. **Privacy of Information.** In carrying out this policy, school personnel are required to maintain the privacy of all educational records as set forth in Section 1012.22, Florida Statutes, and to respect the privacy interests of all students and parents.
6. **Parental Notification.** A copy of this policy shall be made available on the School's website and incorporated into the School's Parent & Student Handbook to fully inform parents.

---

# SCHOOL SAFETY & THREAT MANAGEMENT POLICY

---

*Effective: August 1, 2023*

## **I. SCHOOL SAFETY POLICY STATEMENT:**

---

This is the School Safety Policy/Plan of Clear Choice Academies, Inc. This policy is intended to comply with the requirements of the Marjory Stoneman Douglas High School Public Safety Act (as amended), Rule 6A-1.0018, Florida Administrative Code, Rule 6A-1.0017 Florida Administrative Code, and other relevant laws. This policy shall be considered confidential and exempt from disclosure under the Public Records Act, pursuant to Section 119.071(3), Florida Statutes.

### **1. School Safety Specialist**

The Principal shall either serve as or designate a staff member to serve as the School Safety Specialist for the school. The identity of this person should be reported annually to the Governing Board. The School Safety Specialist is required to attend trainings regarding school safety procedures from the district and state. The individual shall also serve as a member of the Threat Assessment Team and shall be the point of contact for the Marion County School District School Safety Specialist.

### **2. Emergency Procedures (Active Assailant Response Plan)**

Clear Choice Academies, Inc. has adopted Emergency Procedures which are incorporated by reference in Exhibit A. All school personnel must be trained annually on the protocols set forth in the Emergency Procedures no later than October 1 of each year.

### **3. Safe School Plan**

Clear Choice Academies, Inc. currently submits a Safe School Plan annually to Marion County School District. The Safe School Plan is attached hereto as Exhibit "B" and made a part of this policy.

### **4. Threat Assessments**

Clear Choice Academies, Inc. will utilize the "Behavioral Threat Assessment Policies and Best Practices" for purposes of establishing procedures for the School Threat Assessment Team (STAT). A copy of the Behavioral Threat Assessment Policies and Best Practices is attached hereto as Exhibit "B" and made a part of this policy. This policy should be referenced for all questions related to composition of the STAT, training for STAT members, recordkeeping, and procedures for conducting threat assessments and providing ongoing monitoring for identified threats.

### **5. Parent Notification and Access to Information**

Parents of charter school students have a right to the timely notification of threats, unlawful acts, and significant emergencies. If there is a threat to the health and safety of students and faculty on school grounds, during school transportation, or during school-sponsored activities, the Principal, or a designee, will provide parents with timely notification of the incident. In the case of an imminent threat of harm to students, including an active assailant incident or hostage situation, notification to parents must be made as soon as practicable. Such notification should be made in consultation with local law enforcement and first responders in order to avoid

compromising the safety of students and the efficacy of the emergency response and investigation.

The extent of the information provided in the notice will depend on the individual circumstances of the event. In determining the content of notifications to parents, school personnel must consider including specific information about the threat or incident necessary to inform parents and safeguard the community as determined by the threat assessment team or the Principal. Such information may include the date and time of the incident, the location and nature of the threat or incident, how and whether the threat or incident was resolved, a description of the suspect (where applicable), crime prevention and safety tips, and crime and threat reporting information. Notifications must be made in accordance with the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. s. 1232g, 34 C.F.R. Part 99, and Section 1002.22, F.S.

Examples of unlawful acts and significant emergencies requiring notification to parents, include, but are not limited to:

- Fires
- Natural emergencies, including hurricanes, tornadoes, and severe storms
- Active assailant and hostage situations
- Bomb threats
- Weapons possession or use when there is intended harm toward another person
- Murder, homicide, or manslaughter
- Sex offenses, including rape, sexual assault, or sexual misconduct with a student by school personnel
- Exposure as a result of a manmade emergency
- Specific and articulable threats of harm against an individual or individuals
- Other significant events

**Reunification.** Employees should follow the reunification procedures set forth in the Emergency Procedures.

## **6. SESIR**

School Environmental Safety Incident Reporting (SESIR) will be implemented with fidelity throughout the school year in accordance with Rule 6A-1.0017, Florida Administrative Code. SESIR incidents that require a SESIR report pursuant to the rule will immediately be reported to the School Resource Officer or to another Law Enforcement Officer. The Principal or designee will be responsible for reporting each SESIR incident and will undergo the required SESIR reporting training. Pursuant to Section 1002.33(9)c2., Florida Statutes, parents of charter school students have a right to access school safety and discipline incidents as reported through SESIR.

## **7. Involvement of Law Enforcement**

In the event of an imminent threat or actual occurrence of harm to any persons in the school community, the Principal or their designee will immediately contact law enforcement and notify them of the incident. The administration will also consult with law enforcement for all Level I and Level II SESIR offenses, as identified in Rule 6A-1.0017, Florida Administrative Code. This is not intended to limit the authority of school personnel to involve law enforcement in any matter relating to a suspected or actual violation of the law or in any other circumstance warranting the involvement of law enforcement.

## **8. Safe-School Officer**

The school shall comply with Section 1006.12, Florida Statutes, and ensure that a safe-school officer is present on campus during the school day when the campus is open for instruction. Clear Choice Academies, Inc. has adopted a separate Guardian Policy which addresses the requirements for Guardians, which is incorporated herein as Exhibit "C."

## **9. FortifyFL**

Clear Choice Academies, Inc. will adequately promote the use of FortifyFL, the mobile suspicious activity reporting tool operated by the State of Florida. The Principal or their designee will ensure that there is a FortifyFL link on the school's website, at least two newsletters per year will make reference to the service, and posters will be made available on the community bulletin board. In addition, the application will be installed on all mobile devices issued to students, and the site will be bookmarked on all computer devices issued to students. The Board will designate one or more persons who are authorized to receive tips through FortifyFL and ensure that accurate and up-to-date contact information is timely maintained in the FortifyFL database.

## **10. Mobile Panic Alert System**

The Principal or their designee shall annually review options for a mobile panic alert system and ensure that the system is installed, and that appropriate staff members are trained in the use of the system. The Principal or their designee will work with emergency services to ensure the system is set up and operating appropriately. The mobile panic alert system will meet the requirements set forth in Section 1006.07(4)c, Florida Statutes. The mobile panic alert systems must include mobile devices placed throughout the school campus. In determining the number and placement of devices needed to afford all staff members the ability to silently and easily activate the panic alert in the event of an on-campus emergency, the school must consider using a combination of fixed panic alert buttons, mobile and desktop applications, landline phone capabilities, and wearable panic alerts (such as on a lanyard).

## **11. Florida Safe Schools Assessment Tool (FSSAT)**

In order for the Marion County School District School Safety Specialist to complete the school security risk assessment at the school, school personnel will cooperate with the School Safety Specialist' requests for information and access. The Board and administration must ensure that any information needed for required reporting of safety information within FSSAT is timely provided to Marion County School District according to their policies, as necessary. The school will also cooperate with the Marion County School District School Safety Specialist in allowing first responders and public safety agencies to tour the campus every three years to provide recommendations related to school safety.

## **12. Emergency Drills**

The School Safety Plan will clearly document the procedures and details for drills and emergency evacuations. All students and staff members shall be made aware of the plan. Maps highlighting the escape routes for fire drills will be posted in all school rooms and provided to students and staff if requested.

- **Requirements for Drills.** All persons on the campus during an emergency or fire drill must participate in the drill. During emergency drills, fire drills, and during actual emergencies, Clear Choice Academies, Inc. staff will use plain language to communicate

the nature of the emergency and instructions to students and staff. Plain language means communication that can be understood by the intended audience, which is free of coded language, jargon, and acronyms, and meets the purpose of the communicator. Clear Choice Academies, Inc. will vary the conditions of emergency drills and fire drills. Drills must be held at both expected and unexpected times and under varying conditions that require school staff, students, and building occupants to take protective actions based on the specific circumstances of the simulated incident. The time of day in which emergency drills and fire drills are held must be varied. In setting the drill schedule, the Clear Choice Academies, Inc. administration must consider drills beginning at nonstandard times, such as within an hour of the start of the school day, during lunch, when students are between classes, or within an hour of the end of the school day. Emergency drills and fire drills must test all applicable functions included in the threat scenario, such as panic buttons, participant movement (lockdown, shelter-in-place, or evacuation), simulated communications with first responders, notification to parents, and appropriate protective actions, such as turning off lights, and covering windows. Emergency drills and fire drills must be conducted in accordance with developmentally appropriate and age-appropriate procedures.

- **Frequency:** Fire drills must be completed monthly or as often as otherwise required under Florida’s Fire Prevention Code. Clear Choice Academies, Inc. will conduct six (6) emergency drills every school year that are nonconcurrent with fire drills. One (1) emergency drill must take place within the first ten (10) days of the beginning of the school year, and the remaining drills must take place at least every forty-five (45) days that school is in session. Four (4) of the six (6) emergency drills must address active threats. The remaining two (2) drills must address other emergency events, such as severe weather, natural disasters, hazardous materials, or reunification. Law enforcement officers must be physically present on each school campus and directly involved in the execution of active assailant emergency drills, unless their presence is determined to be unnecessary by the sheriff.
- **After Action Reports:** An after-action report must be completed following each emergency drill and fire drill. After-action reports must identify the type of drill, location and date of the drill, participants, and involvement of law enforcement or other public safety agencies. In addition, the after-action report must describe actions taken by participants, must analyze areas of success and areas where improvement is needed, and include input from public safety agencies and a plan for corrective action. After-action reports must be submitted to the Marion County School District School Safety Specialist for review fifteen (15) calendar days following drill completion, or as otherwise required by Marion County School District.

### 13. Hurricane Closures

The organization will follow the same emergency closures as Marion County School District. Parents should monitor local news outlets during inclement weather. If the public schools are closed, Clear Choice Academies, Inc. will also be closed. In the event that multiple closures occur and time must be made up, school days will be added according to the adopted amended school calendar by the school’s governing board.



#### **14. Submission of Documents to District**

All relevant forms and documents may be found in the Emergency Binder at the front desk. Clear Choice Academies, Inc. will timely submit all required documentation related to school safety, including, but not limited to, the following:

- A. FSSAT plan submitted annually to the state.
- B. Annual Safe School Plan for Evacuations provided to Marion County School District, by submitting in Charter Links, by prescribed due date.
- C. Annual Student Crime Watch Program- FortifyFL 1006.07(3) F.S., and compliance with posting requirements, 943.03, provided to Marion County School District.
- D. First Responder/ Law Enforcement Agency Tour of school site (every 3 years-due May 30, 2022—next due date 24-25 SY. 1006.07(6)(a)(4) F.S) provided to Marion County School District.
- E. Annually schedule and conduct periodic testing of Communications Systems, 006.07 (4)© F.S. Submit Communication Test to Marion County School District.
- F. Annual Marion County School District Weapon Use, Hostage, and Active Assailant Situation Training each year with local Law Enforcement. 1006.07(4)(b)(1) F.S. Submit Attendance Verification Form to Marion County School District.

## **II. THREAT MANAGEMENT POLICY STATEMENT:**

---

Clear Choice Academies, Inc. (“SCHOOL”) shall establish a threat management team in accordance with Section 1006.07(7), Florida Statutes. The primary purpose of a threat management team is to minimize the risk of violence at the school. The threat management team is responsible for the coordination of resources and assessment and intervention of individuals whose behavior may pose a threat to the safety of school staff or students.

### **A. Definitions.**

- “CSTAG” means the Comprehensive School Threat Assessment Guidelines behavioral threat assessment instrument, Form CSTAG-2022, which must be used for threat assessments in the School through December 31, 2023. The CSTAG categorizes threats as (1) transient, meaning a threat without a sustained intent to harm that can be easily resolved by apology, retraction, or explanation; or (2) substantive, meaning a threat where the intent to harm is either present or unclear, and requires protective action.
- “Florida Harm Prevention and Threat Management Model” or “Florida Model” means the Florida-specific behavioral threat management process required by Section 1001.212(12), F.S. The Florida Model consists of the Florida Threat Management Manual and the Florida Harm Prevention and Threat Management Instrument (“Instrument”). Under the Florida Model, threats and reports of concerning behavior or concerning communications are categorized as having a low, medium, or high level of concern.
- “School-based mental health services provider” means a school psychologist certified under Rule 6A-4.0311, F.A.C., a school social worker certified under Rule 6A-4.035, F.A.C., a school counselor certified under Rule 6A-4.0181, F.A.C., or a mental health professional licensed under Chapter 490 or 491, F.S., who is employed or contracted by a district or school to provide mental health services in schools.
- “Student Support Management Plan” or “SSMP” means an ongoing intervention and monitoring plan implemented by the threat management team. The SSMP may impose

requirements on a student of concern for a defined period of time based on the level of concern. The SSMP is reviewed each month by the threat management team.

- “Reasonable effort to notify” means the exercise of reasonable diligence and care to make contact with the student’s parent or guardian, typically through the contact information shared by the parent or guardian with the school or school district.
- “Threat Assessment” means the protocols used to assess concerning behavior and threats. Threat assessment protocols are a series of documents, also referred to as a “threat assessment instrument,” comprised of an intake and disposition form; student of concern questionnaire; parent/guardian questionnaire; witness/target of violence questionnaire; teacher survey; and mental health assessments used to help evaluate whether behaviors or communications indicate that a student poses a risk of harm and what services are appropriate to mitigate that risk. The threat assessment process results in comprehensive information gathering from multidisciplinary sources, including law enforcement, mental health, and school records.
- “Threat Management” means the systematic, fact-based method designed to identify, using threat assessment protocols, whether behaviors or communications constitute a concern for violence or harm to another person. Upon a determination that a risk of violence exists, the threat management process then results in determining the level of concern and appropriate management of the person posing the concern to mitigate the risk of harm and remove them from the pathway to violence. The SSMP is part of the threat management process. The threat management process is ongoing and ends only when the threat management team deems ending the process appropriate under the circumstances, or responsibility is transferred to another threat management team.

#### **B. Responsibilities of the Threat Assessments on or Before December 31, 2023**

Threat assessments initiated on or before December 31, 2023, must be done in accordance with CSTAG and the Model Behavioral Threat Assessment Policies and Best Practices for K-12 Schools, as follows:

- Each school must have a threat management team that includes persons with expertise in counseling, instruction, school administration, and law enforcement, who meet the requirements of Rule 6A-1.0019, F.A.C.
- Through December 31, 2023, threats will be assessed using the CSTAG instrument to assess the behavior of persons who may pose a threat to school staff or students and to coordinate intervention and services for such persons. All reported threats, even those determined not to be a threat, must be documented, including the evaluation process and any resultant action.
- The threat management team can meet as often as necessary but must meet monthly to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students. Each meeting must have a record of those in attendance, the case(s) discussed, action(s) taken, and the meeting date and time.
- The threat management team must refer individuals for crisis intervention or mental health services as necessary pursuant to Section 112.584(4), F.S., and refer for self-harm as necessary pursuant to Section 394.463, F.S.
- The threat management team must report quantitative data about the threat assessments team’s activities to the Office of Safe Schools, as required by law.

#### **C. Responsibilities of the Threat Assessments on or After January 1, 2024**

Beginning January 1, 2024, threat management and assessment of concerning behaviors or communications must be conducted in accordance with the Florida Model, as follows:

- The school must have a threat management team comprised of four members, at a minimum, including persons with expertise in counseling, instruction, school administration, and law enforcement. The Principal is responsible for appointing team members. The threat management team must also include a member with personal knowledge of the student of concern who is the subject of threat management. Team members must meet the following requirements:
- The counseling team member must be a school-based mental health services provider that is able to access student mental health records.
- The instructional team member must meet the definition of instructional personnel under Section 1012.01(2)(a)-(d), F.S., or must hold a current Florida Educator Certificate under Section 1012.56, F.S.
- The School administrator team member must meet the definition of administrative personnel found in Section 1012.01(3), F.S. This should not be the Principal unless they are the only administrator at the School.
- The law enforcement team member must be a sworn law enforcement officer who meets the requirements of Rule 6A-1.0019, F.A.C.
- If none of the team members are familiar with the student of concern, the Chair of the threat management team must assign an instructional staff member who is familiar with the student to consult with and provide background information to the threat management team.
- The Principal must appoint a Chair and Vice Chair of the threat management team. The Chair serves as the point person for threat management at the school-level and is responsible for triaging reported threats or concerning behavior and communications to determine whether the matter should be summarily closed or whether it should be reviewed by the full threat management team. The Vice Chair will serve as Chair when the Chair is unavailable.
- The threat management team must follow the following procedures in accordance with state law and administrative rule:
  - The threat management team must use the Florida Model to assess the behavior of students who may pose a threat of harm to themselves or others and to coordinate intervention and services for such students. All reported threats or concerning behaviors and communications, even those determined to be unfounded, must be documented by the threat management team along with any resultant action, using the Florida Model Instrument.
  - The threat management team can meet as often as necessary but must meet at least monthly to fulfill its duties of assessing and intervening with persons whose behavior may pose a threat to school staff or students. Each meeting must have a record of those in attendance, the case(s) discussed, action(s) taken, and the meeting date and time.
  - The threat management team must refer individuals for crisis intervention or mental health services as necessary pursuant to Section 112.584(4), F.S., and refer for self-harm as necessary pursuant to Section 394.463, F.S.

- The threat management team must report quantitative data about the threat assessments team's activities to the Office of Safe Schools, as required by law.

#### **D. Training Requirements**

By December 31, 2023, all members of the threat management team must be trained on the Florida Model through training provided by or approved by the Office of Safe Schools. By December 31, 2023, School principals, the Threat Management Chair, and the Vice Chair must complete additional training specific to their respective roles. Beginning with the 2024-2025 school year, team members who have not previously completed training must complete Florida Model training before the start of the school year. Those appointed to threat management teams after the start of the school year must complete Florida Model training within sixty days of appointment. Beginning with the 2024-25 school year, team members who have been fully trained in a previous school year must complete an annual refresher training provided by the Office of Safe Schools within the first sixty days of school.

#### **E. Notification**

The School must notify in the following circumstances:

- If the threat management team Chair determines the report of a concerning behavior or threat carries a Low level of concern and summarily closes the case, the Chair must use reasonable efforts to notify the parent or guardian of the student of concern.
- If the Chair does not summarily close the case and refers it to the threat management team, reasonable efforts must be made to notify the student of concern's parent or guardian on the same day the threat management team assigns the preliminary level of concern.
- If the preliminary level of concern is High, the threat management team Chair must notify the superintendent or designee to ensure that the notice requirements of Section 1006.07(7)(e), F.S., are met.
- Parents or guardians must also be notified if the threat management process reveals information about their student's mental, emotional, or physical health or well-being, or results in a change in related services or monitoring, including but not limited to implementation of an SSMP.
- Once an SSMP is finalized and any time it is substantively revised, the threat management team Chair must provide a copy of the SSMP to the student of concern's parent or guardian. The targeted student's parent or guardian should also be informed that an SSMP has been implemented.
- Where a report of concern includes an identified student target, the Chair must make a reasonable effort to notify the parent or guardian of the targeted student before the end of the school day that the report was received, unless the Chair has determined the concern is unfounded. As provided for in the Florida Harm Prevention and Threat Management Manual, the unfounded summary disposition should only be used when it is clear and articulable that there is no basis for concern. If there is any doubt, the case should be forwarded to the threat management team for further evaluation and parent notification should occur.
- Nothing herein prevents the school from notifying parents or guardians if they believe it is in the best interest of the student.

The threat management team Chair must document all attempts to make contact with the parent or guardian. Timelines for required notice may be modified where the threat management team reasonably believes and documents that such disclosure would result in abuse, abandonment, or neglect, as defined in Section 39.01, F.S.

#### **F. Reporting & Sharing Information**

- Threat assessments and records related to threat management are considered education records as defined by the Family Educational Rights and Privacy Act (FERPA) and Sections 1002.22 and 1002.221, Florida Statutes. Policies relating to access, maintenance, and retention of these records must be consistent with Rule 6A-1.0955, F.A.C., Education Records.
- Upon a preliminary determination by the threat management team that a student poses a threat of violence to himself or herself or others or exhibits significantly disruptive behavior or need for assistance, authorized members of the threat management team may obtain criminal history record information about the student. A member of a threat management team may not disclose any criminal history record information obtained pursuant to this section or otherwise use any record of an individual beyond the purpose for which such disclosure was made to the threat management team.
- All school personnel will report to the Principal about any individual who is suspected of posing a threat to school safety. If the threat is imminent, the Principal may take any necessary action to avert a crisis situation but will report the incident to the threat management team as soon as feasible. Otherwise, the Principal will convene the threat management team to assess the threat.
- Upon a preliminary determination that a student poses a threat of violence or physical harm to himself or herself or others, the threat management team shall immediately report its determination to the Principal, or his or her designee. The Principal, or his or her designee, shall immediately attempt to notify the student's parent or legal guardian. Nothing in this subsection shall preclude school personnel from acting immediately to address an imminent threat.
- The School will comply with all data reporting requirements as required by applicable law and administrative rules.

**SCHOOL SAFETY & THREAT MANAGEMENT POLICY**  
**EMERGENCY PROCEDURES FOR ACTIVE ASSAILANT**  
**EXHIBIT A**

**I. PURPOSE:**

This policy is intended to provide guidance in the event an active shooter/assailant is actively shooting or injuring persons on a school campus or other CCA property. These guidelines will comply with state mandates and best practices recommended by local, state, and federal agencies.

**II. POLICY**

It is the policy of Clear Choice Academies, Inc. to provide an active shooter/assailant emergency response plan to alert staff, students, law enforcement and visitors that a violent intruder appears to be actively engaged in killing or attempting to kill people at the school campus or other CCA properties. Our active shooter/assailant plan is based on giving employees the ability for an options based response, which can be the difference between life and death. The goal is to allow options that would save lives prior to the arrival of law enforcement. CCA, in conjunction with the CCA, has adopted the ALICE protocol as an option based response.

**III. A.L.I.C.E. PROTOCOL**

ALICE Training® is a widely adopted, effective method of active shooter response training, which began in 2000. The acronym, A.L.I.C.E. incorporates the procedures for the protocol, as follows:

**A – ALERT: Alert is your first notification of danger.**

Students and staff who are made aware of or witness a dangerous situation should immediately notify others through proper communication channels, and notify 9-1-1 and/or emergency responder communication methods.

**L – LOCKDOWN: Barricade the room. Prepare to EVACUATE or COUNTER if needed.**

Staff must work together to clear the hallways, barricade students safely in classrooms or other rooms, using proper safety protocols including: locking classroom doors, hovering in corners away from doors or potential bullet spray, and barricading doorways to reduce or prevent entrance. If barricading is not safe, evacuation, when possible, to a safe distance from the school is the next best option. When all else fails, countering may be necessary.

**I – INFORM: Communicate the violent intruder’s location and direction in real time.**

When safely possible, staff must communicate to emergency responders the intruder’s

location and direction in real time via communication devices to help reduce risk to innocent bystanders and/or victims and ensure first responders are aware of the intruder's whereabouts to increase chances of a successful apprehension or elimination.

**C – COUNTER: Create Noise, Movement, Distance and Distraction with the intent of reducing the shooter's ability to shoot accurately. Counter is NOT fighting.**

Staff and students are not encouraged to fight the intruder to reduce risk of potential harm or death, as well as make it more difficult for the School Safety Officer and/or first responders to do their job. Staff and students are encouraged to allow the School Safety Officer and/or first responders to address the intruder. Until then, countering may be necessary, which includes creating diversions away from other staff and students, such as loud noises (alarms, etc.), movement, and distancing.

**E – EVACUATE: When safe to do so, remove yourself from the danger zone.**

Staff and students are encouraged to evacuate the danger zone as quickly and efficiently as possible to reduce the threat area. This includes evacuating to a specified location and waiting for further instructions from school administrators and/or law enforcement.

**SCHOOL SAFETY & THREAT MANAGEMENT POLICY**  
**SCHOOL SAFETY AND SECURITY PLAN**  
**EXHIBIT B**

**I. POLICY STATEMENT:**

The Board is committed to maintaining a safe, secure, and drug-free environment in all CCA schools.

School crime and violence are multifaceted problems that need to be addressed in a manner that utilizes all available resources in the community through a coordinated effort of CCA personnel, the District, law enforcement agencies, first responders, and families. The Board further believes that school administrators and local law enforcement officials must work together to provide for the safety and welfare of students while they are at school or a school-related event or are on their way to and from school.

**II. POLICY**

The Executive Director, in conjunction with the School Safety Specialist, will develop a *School Safety and Security Plan* with input from representatives of the local law enforcement agencies; the local Fire Marshall(s) or his/her designee(s); representative(s) from emergency medical services;

- A. members of the Board;
- B. school administrators;
- C. School Resource Officer(s) and/or Guardian(s);
- D. commissioned school safety officers;
- E. local mental health agency;
- F. teachers and staff.

Included within the CCA's School Safety and Security Plan will be a CCA Active Assailant Response Plan (CAARP). The CAARP will include, at a minimum, procedures addressing the following:

- A. security assessments;
- B. roles and responsibilities of CCA personnel;
- C. roles and responsibilities of Safe-School Officers (Policy 8407 - *Safe-School Officers*);
- D. information sharing;



- E. training of CCA personnel and exercises/drills, including training standards;
- F. identification of Safe Spaces and Command Posts;
- G. response to the threat of an active assailant;
- H. response to the presence of an active assailant on school grounds;
- I. communication with law enforcement prior to and after law Enforcement arrives on school grounds;
- J. responsibilities prior to law enforcement arrival;
- K. responsibilities when law enforcement arrives on school grounds;
- L. communication with the public; and
- M. post-incident recovery.

The CCA will adopt its initial CAARP by January 31, 2024, and annually thereafter.

Further, by October 1st of each year, the Executive Director must certify to the Office of Safe Schools that all school personnel has received annual training on the procedures contained in the CCA's CAARP.

### **School Safety Specialist**

The Executive Director is responsible for designating the CCA's School Safety Specialist. The School Safety Specialist must be a school administrator employed by CCA or a law enforcement officer employed by the Marion County Sheriff's Office. Prior to appointing a law enforcement officer to serve as the School Safety Specialist, the Executive Director must verify that the law enforcement officer has met all statutory requirements and has been authorized and approved by the Marion County Sheriff's Office to serve as the School Safety Specialist.

The School Safety Specialist is responsible for the supervision and oversight for all school safety and security personnel, policies, and procedures in the CCA. The School Safety Specialist's responsibilities include, but are not limited to, the following:

- A. reviewing CCA policies and procedures for compliance with Florida law and applicable rules, including the CCA's timely and accurate submission of school environmental safety incident reports to the Department pursuant to F.S. 1001.212;
- B. providing necessary training and resources to students and staff in matters relating to youth mental health awareness and assistance; emergency procedures, including active shooter training; and school safety and security;
- C. serving as the CCA liaison with local public safety agencies and national, State, and community agencies and organizations in matters of school safety and

security;

- D. conduct annually, in collaboration with the appropriate public safety agencies, a school security risk assessment at each CCA school using the Florida Safe Schools Assessment Tool developed by the Office of Safe Schools;

The CCA will report to FLDOE by October 15th of each year that all CCA schools have completed the assessment using the Florida Safe Schools Assessment Tool. For purposes of this section, "public safety agencies" means a functional division of a public agency which provides firefighting, law enforcement, medical, or other emergency services.

- E. coordinating with appropriate public safety agencies, as defined in F.S. 365.161, that are designated as first responders to a school's campus to conduct a tour of such campus once every three (3) years and to provide recommendations related to school safety;

Any changes related to school safety, emergency issues, and recommendations provided by the public safety agencies will be considered as part of the recommendations by the School Safety Specialist to the Board.

- F. providing, or arranging for the provision of, youth mental health awareness and assistance training to all school personnel as set forth in F.S. 1012.584;

The training program shall include, but is not limited to, the following:

1. an overview of mental illnesses and substance abuse disorders and the need to reduce the stigma of mental illness;
2. information on the potential risk factors and warning signs of emotional disturbance, mental illness, or substance use disorders, including, but not limited to, depression, anxiety, psychosis, eating disorders, and self-injury, as well as common treatments for those conditions and how to assess those risks; and
3. information on how to engage at-risk students with skills, resources, and knowledge required to assess the situation, and how to identify and encourage the student to use appropriate professional help and other support strategies, including, but not limited to, peer, social, or self-help care.

The CCA's School Safety Specialist will earn, or designate one (1) or more individuals to earn, certification as a youth mental health awareness and assistance trainer as set forth in F.S. 1012.584.

### **Recommendations of the School Safety Specialist**

Based on the findings of the school security risk assessment, the School Safety Specialist must provide recommendations to the Executive Director and Board which identify strategies and activities that the Board should implement in order to address the findings and improve school safety and security. The Board will review the school

security risk assessment findings and the recommendations of the School Safety Specialist at a publicly noticed Board meeting to provide the public an opportunity to hear the Board members discuss and take action. The *School Safety and Security Plan* is, however, confidential and is not subject to review or release as a public record.

The School Safety Specialist will report the school security risk assessment findings and the Board's action(s) to the Office of Safe Schools no later than thirty (30) days after the Board meeting.

As a part of the *School Safety and Security Plan*, the Board shall verify that it has procedures in place for keeping schools safe and drug-free that include:

- A. safety and security best practices;
- B. appropriate and effective school discipline policies that prohibit disorderly conduct, the illegal possession of weapons and the illegal use, possession, distribution, and sale of tobacco, alcohol, and other drugs by students;
- C. security procedures at school and while students are on the way to and from school;
- D. prevention activities that are designed to maintain safe, disciplined and drug-free environments;
- E. a code of conduct or policy for all students that clearly states the responsibilities of students, teachers, and administrators in maintaining a classroom environment that:
  1. allows a teacher to communicate effectively to all students in the class;
  2. allows all students in the class the opportunity to learn;
  3. has consequences that are fair, and developmentally appropriate;
  4. considers the student and the circumstances of the situation; and
  5. is enforced accordingly.

### **Safety and Security Best Practices**

The Executive Director will develop administrative procedures for the prevention of violence on school grounds, including the assessment and intervention with individuals whose behavior poses a threat to the safety of the school community, including the following best practices:

- Locking classroom doors and outside entrances during school hours
- Controlling visitor access to campus through a single point of entry
- Screening all campus visitors
- Training and empowering all staff to activate an emergency response

- Identifying the safest space in every classroom
- Providing emergency covers for all classroom windows
- Ensuring every student has a trusted adult
- Coordinating with first responders before a campus emergency
- Conducting regularly scheduled drills & evacuation procedures
- Creating a positive and productive drug-free work & learning environment that includes programs to curb violence, bullying, self-harm, and harassment
- Installing security equipment that includes video surveillance; alarm systems; two-way communications with all classrooms, offices, and large capacity spaces; and external communications between emergency responders
- Other protocols as later identified

### **Persistently Dangerous Schools**

The Board has set forth the rules with regard to expected behavior in Student Conduct and has established the consequences for violating the policy on student conduct of the policy. The Board recognizes that not only Federal, but also State law requires that the CCA report annually incidents which meet the statutory definition of violent criminal offenses that occur in a school, on school grounds, on a school conveyance, or at a school-sponsored activity, as well as those incidents that would be a Gun-Free Schools Act violation. It is further understood that the Florida Department of Education will then use the data for the offenses identified in the Department's Unsafe School Choice Option Policy to determine whether or not a school is considered "persistently dangerous".

Pursuant to the Board's stated intent to provide a safe school environment, school administrators are expected to respond appropriately to any and all violations of the Student Code of Conduct, especially those of a serious, violent nature. In any year where the number of reportable incidents of violent criminal offenses in any school exceeds the threshold number established in State law, the Executive Director must convene a meeting of the building administrator, representative(s) of the local law enforcement agencies, and any other individuals deemed appropriate for the purpose of developing a plan of corrective action that can be implemented in an effort to reduce the number of these incidents in the subsequent year.

The Executive Director will make a report to the Board about this plan of corrective action and will recommend approval and adoption of it.

In the unexpected event that the number of reportable incidents in three (3) consecutive school years exceeds the statutory threshold and the school is identified as persistently dangerous, the Executive Director will offer parents and eligible students the opportunity to transfer to another school within the CCA that serves the same grades. If there is another school within the CCA serving the same grades, the transfer shall be completed in a timely manner. If there is not another school within the CCA that serves the same grades, then parents and eligible students will be advised that, although Federal and State law provides for an opportunity to transfer, they will be unable to do so.

In addition, the Executive Director will convene a meeting of the building administrator, representative(s) of the local law enforcement agencies, and any other individuals deemed appropriate for the purpose of developing a plan of corrective action that can be

implemented in an effort to reduce the number of these incidents in the subsequent year.

### **Victims of Violent Crime**

The Board further recognizes that, despite the diligent efforts of school administrators and staff to provide a safe school environment, an individual student may be a victim of a violent crime in a school, on school grounds, on a school conveyance, or at a school-sponsored activity. In accordance with Federal and State laws, the parents or the eligible student shall be offered the opportunity to transfer to another school within the CCA that serves the same grades. If there is another school serving the same grades, the transfer shall be completed in a timely manner. If there is not another school serving the same grades, the parents or eligible student will be advised that, although they have the right to transfer, they will be unable to do so.

### **School Threat Assessment Teams**

The primary purpose of a threat assessment is to minimize the risk of violence at schools. Threat assessment teams are responsible for the coordination of resources and assessment and intervention with individuals whose behavior may pose a threat to the safety of school staff or students consistent with the model policies and procedures developed by the Office of Safe Schools which addresses early identification, evaluation, early intervention, and student support.

#### **A. Location and Membership**

1. Threat assessment teams are located at each school in the CCA and composed of individuals with expertise in counseling, instruction, school administration, and law enforcement.
2. The Board authorizes the Executive Director to create procedures for the purpose of:
  - a. identifying team participants by position and role;
  - b. designating the individuals (by position) who are responsible for gathering and investigating information; and
  - c. identifying the steps and procedures to be followed from initiation to conclusion of the threat assessment inquiry or investigation.

#### **B. Responsibilities and Activities of Threat Assessment Teams**

The responsibilities and activities of threat assessment teams include, but are not limited to, the following:

1. identification of individuals in the school community to whom threatening behavior should be reported and provide guidance to students, faculty, and staff regarding recognition of threatening or aberrant behavior that may represent a threat to the community,

school, or self;

2. utilizing the Department's behavior threat assessment instrument developed pursuant to F.S. 1001.212;
3. consult with law enforcement when a student exhibits a pattern of behavior, based upon previous acts or the severity of an act, that would pose a threat to school safety;
4. consult with law enforcement when a student commits more than one (1) misdemeanor to determine if the act should be reported to law enforcement;
5. if a preliminary determination is made by the threat assessment team that a student poses a threat of violence or physical harm to himself/herself or others, the threat assessment team will report its determination to the Executive Director;

The Executive Director shall immediately attempt to notify the student's parent or legal guardian. However, nothing in this paragraph shall preclude CCA personnel from acting immediately to address an imminent threat.

6. if a preliminary determination is made by the threat assessment team that a student poses a threat of violence to himself/herself or others or exhibits significantly disruptive behavior or need for assistance, authorized members of the threat assessment team may obtain criminal history record information pursuant to F.S. 985.04(1);

Members of the threat assessment team may not disclose any criminal history record information obtained pursuant to this paragraph or otherwise use any record of an individual beyond the purpose for which such disclosure was made to the threat assessment team.

7. create procedures related to engaging behavioral health crisis resources.

**C. Sharing of Information**

CCA and other agencies and individuals that provide services to students experiencing, or at risk of, an emotional disturbance or a mental illness and any service or support provider contracting with such agencies may share with each other records or information that are confidential or exempt from disclosure under F.S. Chapter 119 if the records or information are reasonably necessary to ensure access to appropriate services for the student or to ensure the safety of the student or others.

**D. Immediate Mental Health or Substance Abuse Crisis**

If an immediate mental health or substance abuse crisis is suspected, school personnel will follow policies established by the threat assessment team to

engage behavioral health crisis resources. Behavioral health crisis resources, including, but not limited to, mobile crisis teams and school resource officers trained in crisis intervention will provide emergency intervention and assessment, make recommendations, and refer the student for appropriate services. Onsite school personnel will report all such situations and actions taken to the threat assessment team, which will contact the other agencies involved with the student and any known service providers to share information and coordinate any necessary follow-up actions. Upon the student's transfer to a different school, the threat assessment team shall verify that any intervention services provided to the student remain in place until the threat assessment team of the receiving school independently determines the need for intervention services.

Each threat assessment team shall report quantitative data on its activities to the Office of Safe Schools and shall utilize the threat assessment database developed pursuant to F.S. 1001.212.

### **Referral to Mental Health Services**

All school personnel who receive training pursuant to F.S. 1012.584 will be notified of the mental health services that are available for CCA students.

### **School Environmental Safety Incident Reporting**

The Executive Director is responsible for ensuring the accurate and timely reporting of incidents related to school safety and discipline in accordance with Florida law and rules promulgated by FL DOE.

### **Student Crime Watch Program**

The Board shall implement a Student Crime Watch Program to promote responsibility among students and improve school safety. Through a Board resolution, the Board will require each school principal to distribute information (including a reference to Policy 8406) at their respective schools notifying students and the community as to how they can anonymously relay information concerning unsafe and potentially harmful, dangerous, violent, or criminal activities, or the threat of these activities, to appropriate public safety agencies and school officials.

### **Promotion of School Safety Awareness**

In furtherance of Policy 8406 (*Reports of Suspicious Activity and Potential Threats to Schools*), the Board shall promote the use of the Florida Department of Education's mobile suspicious reporting tool ("FortifyFL") on the CCA websites, in newsletters, on school campuses, and in school publications. FortifyFL shall also be installed on all mobile devices issued to students and bookmarked on all computer devices issued to students.

**SCHOOL SAFETY & THREAT MANAGEMENT POLICY**  
**SAFE SCHOOL OFFICER**  
**EXHIBIT C**

**I. POLICY:**

Pursuant to S. 30.15(k), F.S., CCA adheres to and adopts the Chris Hixon, Coach Aaron Feis, and Coach Scott Beigel Guardian Program, to aid in the prevention or abatement of active assailant incidents on school premises, as required under this paragraph. Persons certified as school guardians pursuant to this paragraph have no authority to act in any law enforcement capacity except to the extent necessary to prevent or abate an active assailant incident.

The Guardian Program allocates funds to participating sheriffs' offices for screening and training volunteers to respond immediately in the event of a school shooting. Volunteers may include contracted Class C & G licensed security guards, as well as certain district and charter school employees. District and charter school volunteers receive a one-time stipend for serving in the program. The schools must partner with a sheriff's office to participate in the Guardian Program.

**II. TRAINING:**

Persons certified as school guardians undergo a rigorous training program with a standardized statewide curriculum as required in sub-subparagraph 2.b. of the Statute. Each sheriff providing such training shall adhere to the course of instruction specified in that sub-subparagraph. Sheriffs are not prohibited from providing additional training.

A school guardian who has completed the required training program may not be required to attend another sheriff's training program unless there has been at least a one-year break in his or her employment as a guardian.

- a) The sheriff conducting the training pursuant to subparagraph 2. will be reimbursed for screening-related and training-related costs and for providing a one-time stipend of \$500 to each school guardian who participates in the school guardian program.

A sheriff who establishes a program shall consult with the Department of Law Enforcement (FLDLE) on programmatic guiding principles, practices, and resources, and shall certify as school guardians, without the power of arrest, school employees, as specified in s. 1006.12(3), who:

- a) Hold a valid license issued under s. 790.06.
- b) Complete a 144-hour training program, consisting of 12 hours of certified nationally recognized diversity training and 132 total hours of comprehensive firearm safety and proficiency training conducted by Criminal Justice Standards and Training Commission-certified instructors, which must include:



- i. Eighty (80) hours of firearms instruction based on the Criminal Justice Standards and Training Commission's Law Enforcement Academy training model, which must include at least 10 percent but no more than 20 percent more rounds fired than associated with academy training. Program participants must achieve an 85 percent pass rate on the firearms training.
  - ii. Sixteen (16) hours of instruction in precision pistol.
  - iii. Eight (8) hours of discretionary shooting instruction using state-of-the-art simulator exercises.
  - iv. Sixteen (16) hours of instruction in active shooter or assailant scenarios.
  - v. Eight (8) hours of instruction in defensive tactics.
  - vi. Four (4) hours of instruction in legal issues.
- c) Pass a psychological evaluation administered by a psychologist licensed under chapter 490 and designated by the Department of Law Enforcement and submit the results of the evaluation to the sheriff's office. The Department of Law Enforcement is authorized to provide the sheriff's office with mental health and substance abuse data for compliance with this paragraph.
  - d) Submit to and pass an initial drug test and subsequent random drug tests in accordance with the requirements of s. 112.0455 and the sheriff's office.
  - e) Successfully complete ongoing training, weapon inspection, and firearm qualification on at least an annual basis.

The sheriff who conducts the guardian training shall issue a school guardian certificate to individuals who meet the requirements of this section to the satisfaction of the sheriff, and shall maintain documentation of weapon and equipment inspections, as well as the training, certification, inspection, and qualification records of each school guardian certified by the sheriff. An individual who is certified under this paragraph may serve as a school guardian under s. 1006.12(3) only if he or she is appointed by the Executive Director or school Principal.

---

## SPECIAL MAGISTRATE FOR TEACHER EMPOWERMENT POLICY

---

*Effective: August 1, 2023*

### **POLICY STATEMENT:**

This is the Policy on complaints related to a teacher being directed by Clear Choice Academies, Inc. (the "School") to violate general law or State Board rules as described in Section 1015.06, Florida Statutes. This policy is implemented to comply with the requirements of Rule 6A-1.094127, Florida Administrative Code, Section 1015.06, F.S, Florida Statutes, and other relevant laws.

- 1. Types of Concerns Covered.** A Special Magistrate will only consider disputes where a classroom teacher alleges that he or she has been directed to violate general law or State Board of Education Rule by the School or the School District.
- 2. Complaint Procedures.** To request appointment of a Special Magistrate, a teacher must follow these steps:
  - Complete and return the form entitled "Teacher Request for Appointment of a Special Magistrate" which is available by request or online;<sup>2</sup>
    - Describe the nature of the dispute, including the School procedure or practice in question and the general law(s) or State Board rule(s) the School is allegedly directing the teacher to violate through its procedure or practice;
    - Describe the resolution or relief previously sought at the School and School District level;
    - Describe the resolution sought from the Special Magistrate and the State Board of Education;
  - Demonstrate that before filing for the appointment of a Special Magistrate, resolution of the dispute was sought by the teacher with the teacher's Principal and subsequent to that, resolution was sought by the teacher at the School District level, all in accordance with the procedures adopted by the School District for resolution of the dispute. In order to meet this requirement, the teacher must demonstrate that he or she has, ***in writing***, pointed the Principal and School District personnel to the specific provision(s) of general law or State Board rule the district is requiring him or her to violate and how that act or omission would violate that specific provision of general law or State Board rule; and
  - Provide and maintain accurate contact information such as an email address, telephone number and mailing address.

The Department will provide the teacher and the School District written notice once a decision has been made. A Special Magistrate may not be appointed for a number of other reasons, such as the failure to fully utilize School District procedures for resolution, or where referral would interfere with an investigation or other administrative, civil, or criminal proceedings.

- 3. Incorporation of Policy.** This policy shall be incorporated into the School's Employee Handbook.

---

<sup>2</sup> [https://web02.fl DOE.org/rules/doc/6A-1.094127\\_2981.pdf](https://web02.fl DOE.org/rules/doc/6A-1.094127_2981.pdf)



---

## SUSPENSION AND EXPULSION POLICY

---

*Effective: July 1, 2023*

### **PURPOSE:**

Clear Choice Academies (CCA) acknowledges that the removal of a student from the school's educational program, whether through suspension or expulsion, represents a significant and serious consequence that requires adherence to due process. The CCA Board is responsible for outlining and communicating the specific offenses that could result in a student's exclusion from school. For students with disabilities, any exclusions will be managed in accordance with relevant state and federal laws and regulations.

CCA has the authority to suspend or expel a student, either temporarily or permanently, following a proper hearing and assessment of the situation. The determination of the duration of suspension or the possibility of permanent expulsion rests with the school's judgment.

### **SUSPENSION PROCEDURE:**

The Principal, or Executive Director, is empowered to suspend any student for acts of disobedience or misconduct, including breaches of the Code of Conduct, for a duration ranging from one (1) to ten (10) consecutive school days. Immediate written notification of the suspension shall be sent to both the parent/guardian and the Executive Director. No student shall face suspension without being apprised of the grounds for suspension and being afforded an opportunity to present their case before the authorized school official who holds the authority to reinstate the student. Preceding notification may not be obligatory in instances where there is a clear threat to the health, safety, or well-being of the school community. Consecutive suspensions that extend beyond the span of ten (10) school days are not permitted.

In cases where a suspension exceeds three (3) school days, the student and his/her parent/guardian will be provided the opportunity for an informal hearing with the building principal or a designated representative. This hearing shall be scheduled as expeditiously as possible following the suspension. CCA will offer to conduct the hearing within the initial five (5) days of the suspension. The aim of the informal hearing is to enable the student to present their perspective on the incident that led to the suspension, demonstrate reasons why the suspension is unwarranted, and explore strategies for preventing future transgressions.

### ***Due Process – Informal Hearing:***

1. Written notification of the suspension reasons shall be provided to the student and parent/guardian.
2. The student and parent/guardian shall receive ample notice of the informal hearing's time and location.
3. The student has the right to question witnesses present at the informal hearing.
4. The student is allowed to speak and present witnesses during the informal hearing.

5. An offer shall be extended to hold the informal hearing within five (5) days of the suspension.

**In-School Suspension** (exclusion from class):

No in-school suspension shall be enacted without the student receiving notice of the grounds for such suspension and the opportunity to be heard prior to the suspension's commencement. The school shall inform the parent/guardian of the suspension decision.

In instances where the in-school suspension surpasses a consecutive period of ten (10) school days, the student and parent/guardian shall be provided an informal hearing with the building principal. This hearing should occur before the eleventh day of the in-school suspension. The procedure for the informal hearing shall align with those for out-of-school suspensions.

The school will ensure educational provision for the student during the period of in-school suspension.

**EXPULSION PROCEDURE:**

Expulsion entails removal from school for a period exceeding ten (10) consecutive school days. CCA retains the authority to expel a student from the school rolls when the student's actions warrant such action. No expulsion shall occur without affording the student an opportunity for a formal hearing.

***Due Process – Formal Hearing:***

All expulsion actions necessitate a formal hearing adhering to due process requirements:

1. Written charges shall be notified via certified mail to the student's parent/guardian.
2. At least three (3) days' notice of the hearing's time and place shall be provided. This notice will encompass a copy of this policy, hearing procedures, and information about the right to legal counsel representation. A student may request a hearing rescheduling under valid grounds.
3. The hearing shall be private unless a student or parent/guardian requests a public hearing.
4. Legal counsel representation at the parent's/guardian's expense, along with their attendance at the hearing, is permissible.
5. Witness names against the student and their written statements or affidavits shall be disclosed.
6. The right to request live testimony or cross-examination of witnesses against the student.
7. The student's right to testify and present their own witnesses.
8. A written or audio record of the hearing shall be maintained, accessible to the student at their expense or without charge if indigent.
9. The hearing shall occur within fifteen (15) school days of the charges' notification, with

- the possibility of extension upon mutual agreement or due to specific conditions.
10. Notice of the right to appeal the expulsion outcome shall accompany the expulsion decision provided to the student.

**Adjudication:**

A written adjudication shall be issued following CCA’s decision to expel a student, which may also entail additional conditions or sanctions.

**Attendance/School Work During Suspension and Prior to Expulsion:**

Students under out-of-school suspension must rectify missed exams and assignments, as per established guidelines.

If a student faces an expulsion hearing and it is not held within the first ten (10) school days, they must be placed in their regular classes.

Should the formal hearing be unfeasible within the initial ten (10) school days, the school can suspend the student from class for up to five (5) additional school days (totaling fifteen days). This action can be taken after an informal hearing concludes that the student's presence poses a threat to others' safety.

Any additional exclusion prior to a formal hearing shall require mutual agreement. Such students will receive alternative education, potentially involving home study.

**Attendance/School Work After Expulsion:**

Expelled students under seventeen (17) years of age remain subject to compulsory school attendance and shall be furnished with an education.

The parent/guardian shall initially provide the required education within thirty (30) days and furnish written evidence of compliance or inability. If providing education is impossible, the school shall arrange for the student's education within ten (10) days of notification.

Provident may promptly offer an educational program upon expulsion and may waive the 30-day period at its discretion.

**Students With Disabilities:**

Students with disabilities shall receive educational services consistent with state, federal laws, regulations, and CCA policies.

**ADMINISTRATION:**

The Executive Director or designee shall formulate administrative regulations for policy implementation. These regulations encompass:

1. Publication of a Code of Conduct, in harmony with CCA’s student discipline policy.

2. Procedures ensuring due process when depriving a student of the right to attend school.
3. Regulations regarding student records stipulating that disciplinary suspension records shall be retained as per CCA's student records policy.
4. A student's name subject to disciplinary action shall not be incorporated into public meeting agendas, minutes, or records. Code designations may be used instead.
5. An expelled student may apply for readmission under CCA-imposed conditions.

---

# TEACHER APPRENTICESHIP PROGRAM POLICY

---

*Effective: August 1, 2023*

## **POLICY STATEMENT:**

This policy adopted by Clear Choice Academies, Inc (the “School”) and pursuant to section 1012.555 Florida Statutes and State Board of Education Rule 6A- 5.067 provides the policy for the School to participate in the Teacher Apprenticeship Program.

### **1. Definitions.**

- a. *“Initial Teacher Preparation Program,”* also known as ITP, means a program offered by Florida postsecondary institutions to prepare instructional personnel under Section 1004.04, F.S., and Rule 6A-5.066, Florida Administrative Code (F.A.C.).
- b. *“On-the-Job Training”* means a formalized system of job processes, which must be augmented by related instruction, that provides the experience and knowledge necessary to meet the training objective of learning the occupation of teaching. The on-the-job training must be delivered through structured, supervised work experience under the tutelage of a teacher-apprentice mentor.
- c. *“Related Instruction”* means an organized and systematic form of instruction designed to provide the teacher apprentice with knowledge of the theoretical subjects related to the apprentice’s specific occupation. For the purposes of the Teacher Apprenticeship Program, the Related Instruction must consist of upper-division coursework applied toward the award of a baccalaureate degree that prepares the teacher apprentice for initial teacher preparation and a professional certificate as set forth in Section 1012.56, F.S.
- d. *“Teacher Apprentice”* means an individual who holds a temporary teacher apprenticeship certificate in accordance with Section 1012.56(7)(d), F.S., and Rule 6A-4.004, F.A.C., and who is employed by the School and placed in the classroom of a teacher apprentice mentor using team teaching strategies to fulfill the on-the-job training component of the registered Teacher Apprenticeship Program.
- e. *“Teacher Apprentice Mentor”* means a teacher who is employed by and has been selected by the School to serve as a mentor in the Teacher Apprenticeship Program for the on-the-job training component of the Teacher Apprenticeship Program.

### **2. Requirements for a Teacher Apprentice.**

- a. A Teacher Apprentice must hold a temporary teacher apprenticeship certificate as provided in S. 1012.56(7)(d) F.S. and subject to Rule 6A-4.004(4) F.A.C. In order to



be issued a certificate, a potential Teacher Apprentice must meet the following requirements:

- i. Be at least 18 years old;
  - ii. File an affidavit that the applicant subscribes to and will uphold the principles incorporated in the Constitution of the United States and the Constitution of the State of Florida and that the information provided in the application is true, accurate, and complete. This affidavit is subject to additional requirements found in S. 1012.56(2)(b) F.S.;
  - iii. Submit to background screening pursuant to S. 1012.56(2)(d) F.S.;
  - iv. Be of good moral character;
  - v. Be competent and capable of performing the duties, functions, and responsibilities of an educator;
  - vi. Completes the subject area content requirements specified in state board rule or demonstrates mastery of subject area knowledge as provided in S. 1012.56(5) F.S.;
  - vii. Meet the requirements for a certificate in Rule 6A-4.004(4) F.A.C.
- b. A Teacher Apprentice who is issued a temporary certificate must be assigned a Teacher Apprentice Mentor for a minimum of two school years after commencing employment. A temporary teacher apprenticeship certificate is valid for 5 school years, may be issued only once, and is non-renewable.
- c. A Teacher Apprentice will be appointed by the School as an education paraprofessional and must commit to spending the first two years in the classroom of a Teacher Apprentice Mentor using team teaching strategies and fulfilling On the Job Training requirements. A Teacher Apprentice must complete Related Instruction, the Initial Teacher Preparation Program, and all other assignments and maintain accurate records of such for submission on request.

### **3. Requirements for a Teacher Apprentice Mentor.**

- a. A Teacher Apprentice Mentor selected by the School must meet the following requirements:
- i. Hold a valid professional certificate;
  - ii. Have at least 7 years of teaching experience in Florida,
  - iii. Received an aggregate score of highly effective on the three most recently available value-added model (VAM) scores as calculated by the department based upon Rule 6A-5.0411, F.A.C., or received an aggregate score of highly effective on the three most recently available performance evaluations in accordance with Section 1012.34, F.S., if the teacher did not generate a state VAM score calculated based upon Rule 6A-5.0411, F.A.C.;

- iv. Complete Charter School clinical educator training;
- v. Mentor his or her Teacher Apprentice using team-teaching strategies;
- vi. Observe, verify, and submit to the Related Instruction provider supporting evidence of demonstrating on-the-job training requirements in accordance with Rule [6A-23.004\(2\)\(c\)-\(d\), F.A.C.](#)

#### **4. School Responsibilities.**

- a. The School will meet the Teacher Apprenticeship Program standards and will only select Teacher Apprentices who meet the following minimum requirements:
  - vii. Have received an associate’s degree from an accredited postsecondary institution;
  - viii. Have earned a cumulative grade point average of 3.0 in that degree program;
  - ix. Have successfully passed a background screening pursuant to S. 1012.32 F.S.;
  - x. Have been accepted by the Florida postsecondary institution that is offering the related instruction component of the program; and
  - xi. Have received a temporary teacher apprenticeship certificate from the Department as provided in S. 1012.56(7)(d) F.S. and Rule 6A-4.004(4), F.A.C.
  
- b. The School will pay a Teacher Apprentice at least the minimum paraprofessional salary wage in accordance with Rule 6A-5.067 F.A.C.
  
- c. The School will provide the Teacher Apprentice with job duties to ensure that On the Job training is provided and will monitor and ensure that the Teacher Apprentice is acquiring knowledge and skills for instructional practice which must include the following:
  - xii. The practice, demonstration, and mastery of the Florida Educator Accomplished Practices as specified in Rule 6A-5.065, F.A.C.; and
  - xiii. All other requirements of professional preparation as specified in Rule 6A-4.006(2), F.A.C.
  
- d. The School will allow a Teacher Apprentice to switch schools pursuant to Rule 6A-5.067 F.A.C. after their first year if the hiring school has agreed to fund the remaining year of the apprenticeship and has been approved by the Department.
  
- e. Subject to legislative appropriation, the School must provide the teacher Apprentice Mentor with a bonus. Upon completion of the first year of the apprenticeship half of the bonus will be awarded to the Teacher Apprentice Mentor with the remainder of the bonus being awarded at the conclusion of the apprenticeship. The bonus will

only be awarded at the end of the apprenticeship if the Teacher Apprentice is hired by a school district or charter school in the state of Florida.

- f. The School will submit all required data to the Department.

---

## UNRESOLVED STUDENT WELFARE COMPLAINT POLICY

---

*Effective: August 1, 2023*

### **POLICY STATEMENT:**

This is the Policy on Complaints Related to House Bill 1557 of Clear Choice Academies, Inc (the "School"). This policy is implemented to comply with the requirements of Rule 6A-6.0791, Florida Administrative Code, Section 1001.42(8), Florida Statutes, and other relevant laws.

**Types of Concerns Covered.** The "Parental Rights in Education" law, also known as House Bill 1557 (2022), sets forth specific procedures for complaints or disputes falling into those categories detailed in Section 1001.42(8)(c)1.-7, Florida Statutes, and on the "Parental Request for Appointment of a Special Magistrate" form published by the Florida Department of Education and available here: <https://www.fldoe.org/core/fileparse.php/7700/urlt/CSSM-16A-60791.pdf>

This includes any complaints or disputes related to the following:

- Concerns over procedures for notifying a student's parent if there is a change in the student's services or monitoring related to the student's mental, emotional, or physical health or well-being and the school's ability to provide a safe and supportive learning environment for the student.
  - Concerns related to any school policies or procedures that are perceived to discourage or prohibit parental notification of and involvement in critical decisions affecting their student's mental, emotional, or physical health or well-being.
  - Concerns over classroom instruction related to sexual orientation or gender identity, which is prohibited in grades K-8 and must be age-appropriate for all other grades.
  - Concerns over student support services training developed or provided to school personnel that is believed to be out of compliance with guidelines, standards, and frameworks established by the Department of Education.
  - Concerns over parental notification at the beginning of the school year about healthcare services offered by the School, including the ability to opt-out or withhold consent for any such services.
  - **[FOR GRADES K-3 ONLY]** Concerns over whether the School provided a well-being questionnaire or health screening form to the parent and sought their permission before it was administered to the student. This only applies to grades K-3.
- 4. Complaint Procedures. Complaints must be made according to Rule 6A-6.0791.** Parents and guardians have the right to notify the Principal of any concerns related to the above areas. The Principal or their designee must provide a response to the parent within seven (7) days of receiving the complaint. If the dispute cannot be resolved by the Principal or designee within seven (7) days, the parent may present the dispute to the School District.

The School District must attempt to resolve the dispute within no more than thirty (30) days. If the School District is unable to resolve the dispute, a parent may request the appointment of a special magistrate utilizing the “Parental Request for Appointment of a Special Magistrate for Charter School Students” form linked above. For purposes of this policy, the term “days” means business days and excludes state, federal and school holidays.

5. **Incorporation of Policy.** This Policy shall be incorporated into the School’s Parent & Student Handbook to fully inform parents and be published on the School’s website.

---

## **Appendix A: Board Certification of Policy Approvals**

---

### **BOARD STATEMENT:**

The Board of Directors for Clear Choice Academies, Inc. conducts no less than an annual review of its policies and procedures to ensure adherence to and compliance with all local, state, and federal laws. The policies in this manual may have been previously approved and implemented in prior Board Meetings. At the time of this manual's publication, all policies have undergone comprehensive review, revision, amendment, and subsequent approval during a regularly scheduled board meeting, as confirmed by the Secretary of the Board in the certification below.

### **BOARD SECRETARY CERTIFICATION:**

I affirm that the aforementioned policies were adopted via a majority vote and a quorum of the Clear Choice Academies, Inc. Governing Board of Directors during a duly noted meeting on November 17, 2023.

---

Nnekka Nwakoby, Secretary