

The Excel
Center®



Student Policies 2019-2020

NON-DISCRIMINATION POLICY

The Goodwill Excel Center, Public Charter School (GEC) is committed to a policy prohibiting discriminatory practices in all aspects of its policies, programs, practices, and operations. All applicants and students shall be treated equally without regard to race, age, color, religion, gender or expression of gender identity, national origin, political affiliation, disability, matriculation, personal appearance, sexual orientation, family responsibilities, familial status, veteran status, marital status, pregnancy, childbirth, genetic background, or any other legally protected characteristic.

In compliance with Title IX of the Education Amendments of 1972, The Goodwill Excel Center, Public Charter School (GEC) does not discriminate on the basis of sex (including pregnancy and gender identity) in the educational programs and activities which it operates, including employment, admissions, recruitment, referrals, and collective bargaining. If a student believes that he or she has been discriminated against in violation of Title IX, please reference GEC's Grievance Procedures which are available in the Student Handbook and in GEC's administrative offices.

Pregnant students will be provided the same accommodations and supports as are provided to persons with short-term disabilities.

For more information about Title IX, please contact:

School Director
Chelsea Kirk
Chelsea.Kirk@goodwillexcelcenter.org
Phone: 202-309-6615

ATTENDANCE POLICY AND PROCEDURES

The Goodwill Excel Center offers classes in 8-week terms, which makes daily on-time attendance very important. Missing even one day of classroom instruction is like missing an entire week, making a student's path toward graduation longer. For this reason, the Goodwill Excel Center has structured rules around attendance in order to maximize student success in its accelerated program and to support students in meeting the goals of their classes.

Absence: A student is considered absent from a class if he/she is more than 30 minutes late for the class. A student is considered absent for the entire day if he/she misses more than one class. An absence will be "excused" if it is for one of the reasons listed below and the student follows the process below for having the absence found to be excused. During the first week of each term, a partial day absence will not count as an unexcused absence for the purpose of this policy if the reason for the partial day absence is a scheduling conflict.

Absences will be excused for the following reasons:

- Student illness
- Family member of a student illness
- Student doctor's appointment
- Family member of a student doctor's appointment

- Death in the student's immediate family or close friend
- Observance of a religious holiday
- Absences to allow students to visit their parent or legal guardian who is in the military immediately before, during or after deployment
- Jury duty or attendance at court or an administrative hearing under a subpoena or as a party to the action
- Emergency or other circumstances approved by the Lead Academic Success Coach

Process for Having an Absence Found to be Excused:

- A student will contact their Academic Success Coach as soon as possible to inform the Coach they will be missing school and the reason
- For some absences to be excused, a student must bring a note or other documentation to their Academic Success Coach; if required, the note must be brought to the Academic Success Coach within five days of the student's return to school
- Absences can only be excused by the student's Academic Success Coach

Even if the absence is excused, the student will have missed work and class time that they will need to make up. This may delay their progress toward graduation if the work is not made up. Make up work is only provided to students for excused absences.

Attendance Support Plans:

If a student reaches four unexcused absences in a term, the student's Academic Success Coach will reach out to the student. The student must then meet with the Academic Success Coach within two school days of being contacted to create an attendance support plan. If the student is unavailable to meet during that time because of an excused absence, the meeting will be held by phone, if at all possible.

The attendance support plan will be created by the Academic Success Coach, the student's teachers, and other relevant GEC staff. During the eight school days following creation of the plan, the Academic Success Coach will carefully track the student's attendance. If the student has less than four unexcused absences during the eight-day period, then the student will no longer be subject to the plan. Students under 18 who do not meet the requirements of the plan will remain on the plan.

Un-Enrollment from the Goodwill Excel Center for Attendance:

- 1) *Students 18 years and older:* If the student does not meet with the Academic Success Coach within two school days of being contacted to create an attendance support plan, then the student will be unenrolled. If a student with an attendance support plan has four or more unexcused absences within the eight-day improvement period, the student will be unenrolled.
- 2) *Students 17 years and younger:* If a student has twenty (20) consecutive full-day unexcused absences, he/she will be unenrolled.

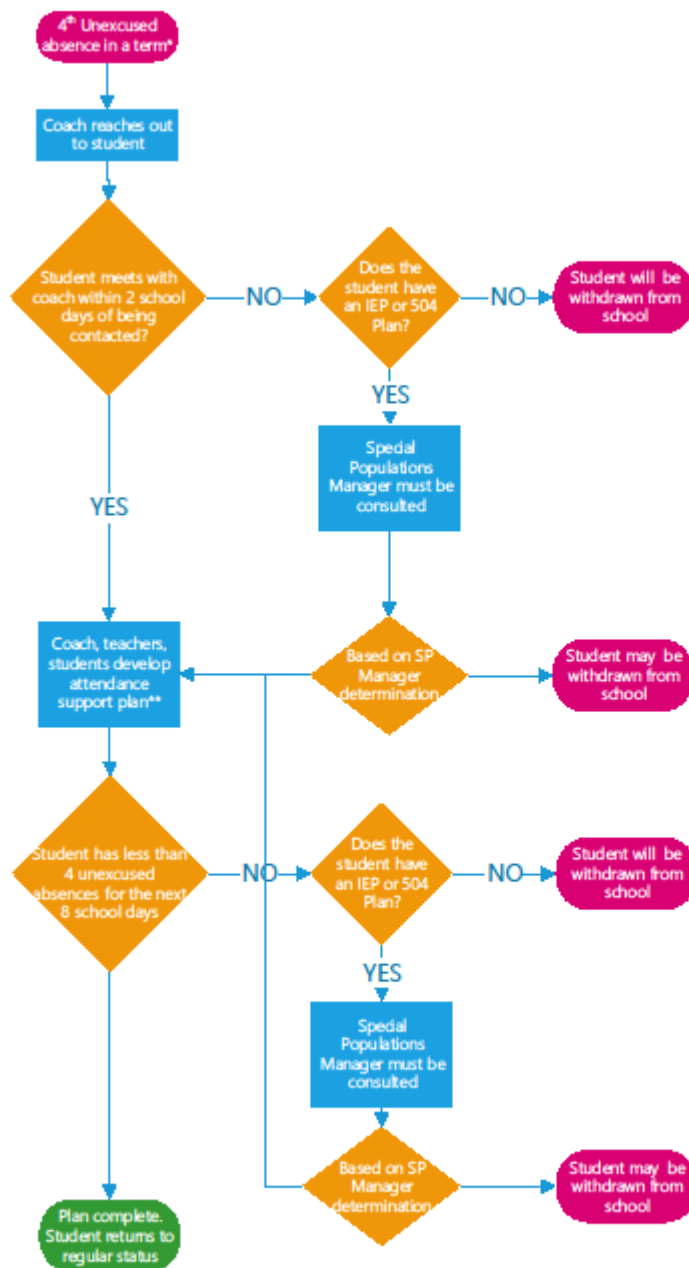
Any student who is unenrolled and wishes to re-enroll will be allowed to re-enroll at the next term if space is available once all those on the wait list have been accepted.

Students with disabilities:

For any student 18 or older with a disability, the Manager, Special Populations will be consulted to determine what accommodations, if any, will be given to the student before unenrolling the student if:

- 1) The student has not contacted their academic success coach within two days to set up an attendance support plan; or
- 2) After having an attendance support plan put in place, the student has four or more unexcused absences.

GEC Attendance process for students 18 and older



*For first week of term, only full-day absences count towards the 4 absence limit

**Special Populations Manager must be involved in developing support plans for all students with IEP or 504 plan

Childcare Accountability:

Any student under the age of 18 who has been awarded a childcare spot in the Childcare Development Center will lose their spot, and will be placed at the end of any waitlist, if either:

- 3) The student has not contacted their academic success coach within two days to set up an attendance support plan; or
- 4) After having an attendance support plan put in place, the student has four or more unexcused absences.

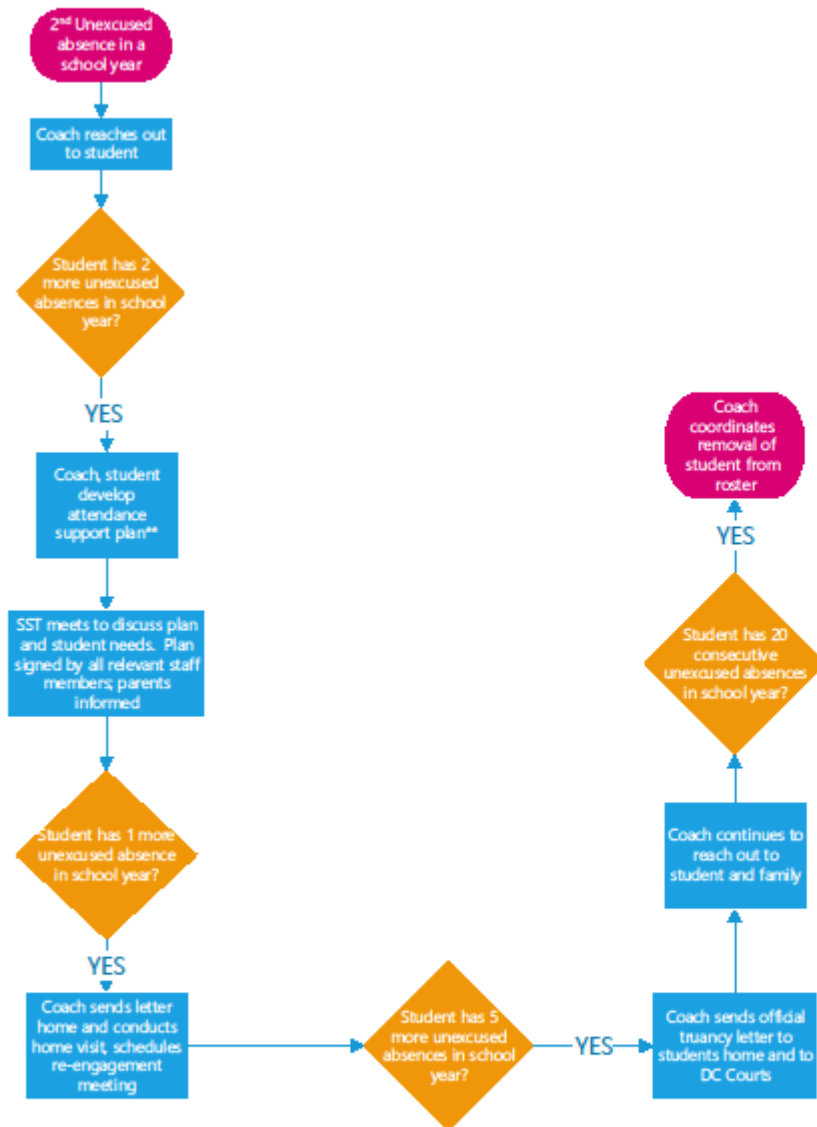
Student Support Team for Students Under 18:

For all students under 18, a student support team will conduct the following attendance interventions based on the number of unexcused absences the student has for the entire year:

- 2 days of unexcused absence – Youth Services Coach will reach out to student
- 4 days of unexcused absence – Youth Services Coach will reach out to student to create an attendance support plan, Student Support Team will meet to discuss plan and student needs
 - Attendance intervention plan signed by all relevant GEC staff members and the parent/guardian of the student will be informed
 - Student Support Team includes: Youth Services Coach, Lead Academic Success Coach, Manager of Student Support Services, and when necessary the Manager of Special Populations
- 5 days of unexcused absence – Youth Services Coach will send a letter home and conduct a home visit to schedule a re-engagement meeting
- 10 days of unexcused absence – Youth Services Coach will send the official truancy letter to the home and to the truancy courts
- Continued on-going outreach
- 20 consecutive days of unexcused absence – Youth Services Coach will coordinate having the student unenrolled

Referral to Judicial System for Truancy of Students Under 18: If a student who is under 18 has ten unexcused absences during the school year, the Goodwill Excel Center will send the student's parent(s) information about the compulsory attendance requirements for minor students, and report the student to the Office of the State Superintendent of Education. Students under age 18 with 15 full-day unexcused absences during the school year will be referred to Court Social Services and the Office of the Attorney General Juvenile Section.

GEC Truancy process - for students 17 and younger



**Special Populations Manager must be involved in developing support plans for all students with IEP

CODE OF CONDUCT AND DISCIPLINE POLICY

The Goodwill Excel Center strives to be a place where all students can learn within a safe environment. The intent of the Code of Conduct is to ensure students remain focused on growth and learning. The Code seeks to provide fair and reasonable rules and procedures to ensure students do not engage in conduct that in any way harms others or interferes with the education of other Goodwill Excel Center students. Students enrolled in the Goodwill Excel Center can expect to receive prevention and intervention support aimed at preventing behavior-based disruptions while at school.

Student Behavior Expectations

A culture of respect is critical to the success of The Goodwill Excel Center. Students must demonstrate respect through appropriate actions, words, tone, and body language. All expected behavior is focused on preparing students for success in life and careers. Unacceptable behavior includes any behavior that harms another person or infringes on another student's ability to learn. This Code of Conduct applies to conduct on or adjacent to school property or that is directed to students or staff of the school. After enrolling in The Goodwill Excel Center, students are provided a copy of this policy and given examples of ways each infraction can be prevented, along with expectations around intervention, largely led by the Academic Success Coaches and Manager of Student Support Services.

To ensure expectations are clear for all students, below is a list of conduct violations -- classified by severity of the offense into five tiers -- along with the possible responses for each violation.

Tier 1 Behaviors

- Arriving to class late.
- Failing to attend class and/or loitering in the hallways or outside of GEC, during class time.
- Not returning to class after a fire drill or other safety drill.
- Failing to possess GEC issued student identification.
- Loitering or littering (including cigarette butts) on the sidewalks adjacent to the building or in the common areas of the building.
- Smoking cigarettes, e-cigarettes, cigars, or other tobacco-based products inside or within 50 feet of the building.
- Disruptive cellphone use during instructional time.
- Wearing clothing that reveals private body parts, underwear, midriff, see through clothing, or pieces of clothing that are extremely short.
- Gambling by playing cards, shooting dice or otherwise making bets.
- Violation of computer use policy for which no other response is specified in this policy.
- Arguing with GEC staff, demonstrating defiant behavior, or exhibiting non-compliance with GEC staff.
- Inappropriate dancing, and/or sexually suggestive movement.
- Using sexually suggestive language, especially in a threatening or disruptive manner.
- Using profanity in a disruptive manner.
- Violation of GEC's Non-Solicitation Policy.

Tier 1 Responses

1 st Offense Response	2 nd Offense Response	3 rd Offense Response
<ul style="list-style-type: none"> • Student disciplinary write-up • Verbal re-direction/coaching session 	<ul style="list-style-type: none"> • Student disciplinary write-up • Placement on a behavior modification plan • Mandatory mediation meeting 	<ul style="list-style-type: none"> • Placement on a behavior modification plan • Mandatory mediation meeting • Short term (1-5 days) suspension if behavior is a safety threat

Tier 2 Behaviors

- Loud, boisterous behavior, including peer-to-peer arguing, and language, and tones that disrupt GEC or patrons of area retail stores and restaurants.
- Being under influence of drugs (including marijuana) or alcohol.
- Off campus use of marijuana or other illicit drugs or alcohol that results in student emitting odor that is distracting to peers or GEC staff.

Tier 2 Responses

1 st Offense Response	2 nd Offense Response	3 rd Offense Response
<ul style="list-style-type: none"> • Student disciplinary write-up • Verbal re-direction /coaching session • Small group session • Leave campus to “air out” 	<ul style="list-style-type: none"> • Student disciplinary write-up • Placement on a behavior modification plan • Mandatory mediation meeting • Small group session • Leave campus to “air out” 	<ul style="list-style-type: none"> • Placement on a behavior modification plan • Mandatory mediation meeting • Short term (1-5 days) suspension if behavior is a safety threat • Leave campus to “air out”

Tier 3 Behaviors

- Committing academic dishonesty by copying from a peer, duplicating a peer’s work and submitting it as one’s own work, cutting and pasting Internet-based content, and submitting it as one’s own and/or printing Internet content and submitting as one’s own.
- Engaging in sexual activity, including the exposure and contact of private body parts.
- Stealing and/or attempting to steal from GEC as a school, GEC staff, and/or GEC peers, items valued at less than \$100.

Tier 3 Responses

1 st Offense Response	2 nd Offense Response	3 rd Offense Response
<ul style="list-style-type: none"> • Student disciplinary write-up • Mandatory tutoring • Small group session • Academic probation • Community service • Short term (1-5 days) suspension • Failure of class (academic dishonesty) 	<ul style="list-style-type: none"> • Student disciplinary write-up • Placement on a behavior modification plan • Mandatory mediation meeting • Small group session • Academic probation • Community service • Failure of class (academic dishonesty) • Short term (1-5 days) suspension • Long term suspension/expulsion 	<ul style="list-style-type: none"> • Short term (1-5 days) suspension • Long term suspension/expulsion • Failure of class (academic dishonesty)

Tier 4 Behaviors

- The use of technology to access sexually and/or violently explicit content, to post inappropriate or unauthorized pictures, and/or post threats, embarrassing, or hurtful images of GEC peers.
- Engaging in sexual harassment by proposing or soliciting sexual favors, sex-based responses, or reactions especially in a way that is offensive, obscene and/or hurtful.
- Bullying or otherwise making threats; physically, or verbally intimidating a GEC staff member and/or peer.
- Stealing and/or attempting to steal from GEC as a school, GEC staff, and/or GEC peers, items values at \$100 or greater.
- Creating, or falsifying communications, records, or documents, including phone records, text.
- Committing false alarms.
- Fighting or otherwise engaging in violence; causing physical harm to another person.
- Malicious destruction of property causing less than \$1,000 damage.
- Possession, use, sale or exchange of a dangerous weapon such as a knife, pepper spray, mace or box cutter.
- The use, manufacture, sale, exchange or distribution of a drug (including marijuana) in or within 500 feet of GEC. (*Note: see Tier 5 for more serious drug offenses.*)
- Suspended for a tier 1-4 infraction two times or more.

Tier 4 Responses

1 st Offense Response	2 nd Offense Response	3 rd Offense Response
<ul style="list-style-type: none"> • Student disciplinary write-up • Community service • Short term (1-5 days) suspension 	<ul style="list-style-type: none"> • Student disciplinary write-up • Placement on a behavior modification plan • Require cellphone to be "checked," with Academic Success Coach each day • Mandatory mediation meeting • Community service • Short term (1-5 days) suspension • Long term suspension/expulsion 	<ul style="list-style-type: none"> • Short term (1-5 days) suspension • Long term suspension/expulsion

Tier 5 Behaviors

Hitting or otherwise assaulting a GEC staff member, or threatening serious bodily harm to a GEC staff member, or:

Any conduct that is a felony under Washington D.C. or Federal law, such as:

- Felony assault (such as assault with a dangerous weapon, assault with intent to cause serious bodily harm, or assault while committing another crime).
- Robbery (theft of something from a person's immediate actual possession).
- Possession of a firearm; possession of a knife that is longer than three inches or a switchblade.
- Manufacturing, sale or possession with intent to distribute of a schedule I, II or III controlled substance (not including simple possession of 8 ounces or less of marijuana).
- Malicious destruction of property causing more than \$1,000 damage.
- Bomb threat.

Tier 5 Responses

1 st Offense Response
Expulsion

Discipline Process

The student is written up by the teacher (if the incident occurred in class) or an Academic Success Coach, or non-instructional staff member (if the incident did not occur in class) and the write-up goes to the Manager, Student Support.

After class (if it is a Tier 1 incident that occurred in class) or after the incident (in all other cases), the Manager, Student Support meets with the student, and, if available, the student's Academic Success Coach. During this meeting, the student is to complete a "First Person Narrative" which is an opportunity for the student to tell what happened, in writing, from their perspective.

The student follows the remainder of their daily schedule unless a suspension is issued before the end of the school day. If a suspension is issued and the student is 18 or older, the student will leave GEC immediately. If a suspension is issued and the student is under 18, the student will not be permitted to leave GEC until the end of the student's regular class schedule or until the student is picked up by his/her parent or guardian. For all students under 18, the Coach will seek and facilitate involvement of the student's parent or guardian in response to the incident resulting in a disciplinary action.

The teacher (or other staff) is to complete a "First Person Narrative" no later than the beginning of the next business day.

The Manager, Student Support reviews both First Person Narratives and determines the appropriate discipline intervention based on the disciplinary protocol and past offenses with the goal of making the discipline individualized, fair, equitable, developmentally appropriate, proportionate to the severity of the student's offense and, where appropriate, restorative.

Law enforcement will be involved only if school personnel determine that student behavior cannot safely and appropriately be handled through other disciplinary action.

Following is a description of each discipline intervention.

Disciplinary Write Up and Verbal Re-direction/Coaching

Counseling by an Academic Success Coach is the initial step to mentor or modify conduct. The Coach will discuss the behavioral concern or conduct violation, affirm expectations regarding conduct, and communicate what the response will be if there is no improvement. Coaching will be documented in the student's file. Immediate resolution of the problem or issue is expected and coaches will follow-up with the student to ensure consistent success.

Behavior Modification Plan

The conduct violation and expectations will be communicated in writing to the student and the student will be provided with a written behavior modification plan. Immediate resolution of the problem or issue is expected.

Short Suspension (1-5 days)

The Manager, Student Support will investigate the conduct violation and adhere to the student discipline code of conduct. The Manager, Student Support will meet with the student to give the student notice of the charge and the information the school has to believe the student engaged in the conduct. The student will be

given an opportunity to present his/her side of the story and/or an explanation for his/her behavior verbally and through completing a "first person narrative." If, after receiving the student's statement, the Manager, Student Support determines that a suspension is warranted, the student will be told the timeframe for the suspension. A letter including the length and reason for the suspension will be given to the student (and parents of students under the age of 18). All students (and parents of students under the age of 18) receiving suspension will be afforded the opportunity to appeal (see process in next section). Immediate resolution of the problem or issue is expected upon a student's return. While suspended, students will be provided with work and access to teachers and coaches to assist them. Any school work that cannot be completed by the student during the suspension may be made up upon returning to school.

Suspensions may only be used to ensure safety or in response to the most serious offenses.

**Long Term
Suspension (6-10
days) or Expulsion**

Expulsion may be necessary when any of the above interventions are not successful in improving conduct or if a student commits a Tier 5 conduct violation, or multiple Tier 4 conduct violations. The Manager, Student Support should investigate the matter promptly (ordinarily within 3 days) and review the performance history and record of progressive discipline with the School Director. If the decision is made to move forward with expulsion, a hearing shall be scheduled promptly (and ordinarily to occur within 5 days of the decision to move forward with the hearing). Written notice must be provided to the student (or parents of students under the age of 18) at least 1-2 days before the expulsion hearing of the specific grounds for the expulsion, and the nature of the evidence supporting the expulsion. The decision maker at the hearing shall be impartial and shall only consider evidence presented at the hearing. The student shall be permitted to present evidence at the hearing. The decision shall be provided in writing to the student (or parents of students under the age of 18) promptly after the hearing (ordinarily within 2 days after the hearing). All students (and parents of students under the age of 18) receiving expulsion will be afforded the opportunity to appeal (see process in next section). While suspended, students will be provided with work and access to teachers and coaches to assist them. Any school work that cannot be completed by the student during the suspension may be made up upon returning to school. If a student who is under 18 or has an IEP is expelled, the Manager, Student Support will recommend alternative school placement.

When a staff member makes a recommendation for expulsion of a student, the School Director or Manager, Student Support may suspend the students until the conclusion of the investigation following the procedure for short suspensions outlined above. This may occur if the School Director or designee believes that the

students must be suspended immediately to prevent or substantially reduce the risk of:

- Interference with an educational function or school purposes; or
- A physical injury to themselves, other students, school employees, or visitors to the school.

Long-term suspensions and expulsions may only be used to ensure safety or in response to the most serious offenses. No student under age 18 may be suspended for more than 20 cumulative school days during an academic year unless (a) the President/CEO of GEC provides written justification to the student and parent describing why exceeding the 20 day limit is a more appropriate disciplinary action than alternative responses; or (b) the student's conduct necessitated an emergency removal and the President/CEO of GEC provides written justification for the emergency removal to the student and parent.

Discipline Appeal Process

Students (or parents if a student is under age 18) shall have 2 business days after being notified of a suspension or expulsion to contact the School Director to request a meeting to appeal a suspension or expulsion. The staff hearing the appeal shall, if feasible, be above, in the supervisory chain of the school, the person who made the suspension or expulsion decision. During the meeting, the student (or parents if a student is under age 18) shall have the right to review the summary of the conduct violations and present their case.

Discipline Process for Students with Disabilities

Students with disabilities that demonstrate conduct violations will immediately be referred to the Special Populations Coordinator, where intervention plans will be developed and implemented. Students with conduct violations that could be the direct results of their disabilities will be required to attend a mandatory intervention meeting with their instructors and their Academic Success Coach and the Special Populations Coordinator. In instances where students are over the age of 22, The Goodwill Excel Center will not need to continue to implement IEP (which does not serve students over age 22) goals for students who are expelled and will not need to contract services for students who are expelled.

For students under age 22 who have IEPs, a Manifestation Determination shall be made by the IEP team within 10 school days of the removal. School personnel may apply the relevant disciplinary procedures to students with disabilities in the same manner and for the same duration as the procedures that would be applied to students without disabilities, if:

- In the MANIFESTATION DETERMINATION review, the behavior that gave rise to the violation of the code of conduct is determined not to be a manifestation of the student's disability;
- SERVICES DURING PERIODS OF REMOVAL are provided to the student; and
- Notification of a CHANGE OF PLACEMENT is given to the student.

School personnel must provide the student removed to a disciplinary alternative education program with written notice of the school's obligation to provide the student with an opportunity

to complete coursework required for graduation that: (a) includes information regarding all methods available for completing the coursework; and (b) states that the methods available for completing the coursework are available at no cost to the student.

School personnel may remove the student to an Interim Alternative Educational Setting without regard to whether the behavior is determined to be a manifestation of the student's disability, if there are SPECIAL CIRCUMSTANCES and the removal is for not more than 45 school days.

Return After Expulsion

An expulsion from GEC will ordinarily be for five terms, which is the equivalent of one full year. After five terms, a student can re-apply to GEC using the same process and subject to the same requirements as any other student. Before the first day of class, he/she will also be required to (1) submit a letter to the School Director explaining why he/she is ready to return to GEC; and (2) participate in a re-entry meeting with the student's Academic Success Coach, the Manager of Student Support, the School Director and the Chief Mission Officer.

GRIEVANCE PROCEDURES

It is the policy of the Goodwill Excel Center that all employees, students, parents, and visitors have the right to voice their complaints or grievances about matters pertaining to its programs and activities. Accordingly, the following grievance procedure should be employed to ensure that complaints receive full consideration.

A grievance is a complaint to GEC about one of the following:

- (1) The educational environment or interpersonal conflicts;
- (2) Issues related to identification and placement of English Language Learners; or
- (3) Discrimination and harassment based upon race, color, national origin, sex, disability, age, religion, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, political affiliation, source of income, or otherwise.

1. Who May File a Grievance

The procedures set forth below may be used by grievants who are students or parents.

2. Other Remedies

The existence of this procedure does not bar grievants from also filing claims in other forums to the extent permitted by state or federal law.

3. Informal Grievance

Because many difficulties can be resolved by communicating a concern to someone, grievants are encouraged to discuss their concern or harassment complaint promptly and candidly with their Academic Success Coach.

If the Academic Success Coach cannot remedy the grievance, the student is encouraged to submit their grievance informally, in writing. When presented with an informal written grievance, the following procedure should be followed:

- The Academic Success Coach should schedule a mediation with the student and the alleged harasser or perpetrator (unless the Academic Success Coach determines that a mediation is likely to subject a victim of harassment to further harm).
- If the mediation is not successful, the student should come with their Academic Success Coach to the School Director for a grievance conference.

The grievant is not required to discuss his or her complaint with the alleged harasser or perpetrator in any manner or for any reason prior to initiating a formal grievance.

4. Formal Grievance

To file a formal grievance, within ninety (90) days of the harassment, discrimination, or complaint that is the subject of the grievance, a grievant shall file a written notice with the Manager, Student Support. The written notice shall identify the nature of the complaint, the date(s) of occurrence, and the desired result, and shall be signed and dated by the person filing the grievance. Contact information for the Manager, Student Support is:

Lawrence Hopkins
 Manager, Student Support
 1776 G Street, NW
 Washington DC, 20006
Lawrence.Hopkins@goodwillexcelcenter.org
 (202) 839-3666

The Manager, Student Support will promptly initiate an adequate and impartial investigation of the grievance. Each formal complaint will be investigated, and will be decided after receiving information from the appropriate individuals. Investigations may include interviewing witnesses, obtaining documents, and allowing parties to present evidence.

All documentation related to the investigation and discussions held in this process are considered EXTREMELY CONFIDENTIAL and should not be revealed to or discussed by any participant with persons not directly involved with the complaint, with its investigation, or with the decision making process. This provision does not include discussions with governmental authorities.

Within thirty (30) days of receiving the written notice, the Manager, Student Support shall respond in writing to the grievant (the "Response"). The Response shall summarize the investigation, state whether the grievance has been found to have merit and, if so, state the appropriate resolution.

If, as a result of the investigation, harassment, or a valid grievance is established, appropriate corrective and remedial action shall be taken.

If the grievance is with the Manager, Student Support the grievant should direct their concerns to the School Director. If the grievance is with the School Director, the grievant should address their concerns with the Manager, Student Support, and if after his/her investigation and action, the grievant is still unsatisfied then the grievant should direct their concerns to the Vice President, Mission Services who can be reached at:

Colleen Paletta
Chief Mission Officer
2200 South Dakota Ave, NE
Washington, D.C. 20018
Colleen.Paletta@dcbgoodwill.org
(202) 715-2609

5. Appeals

If the grievant is not satisfied with the Response, the grievant may appeal in writing to the School Director within ten (10) business days of the date of the Response. The written appeal must contain all written documentation from the initial grievance and the grievant's reasons for not accepting the Response.

Within thirty (30) days after receiving the written appeal, the School Director will respond in writing to the appellant stating whether the appeal has been found to have merit and, if so, state the appropriate action to be taken.

The School Director can be reached at:

School Director
Chelsea Kirk
Chelsea.Kirk@goodwillexcelcenter.org
Phone: 202-309-6615

6. Prohibition Against Retaliation

The Goodwill Excel Center prohibits retaliation against any person who files a complaint in accordance with this policy, or any person who participates in proceedings related to this policy.

In addition, the Goodwill Excel Center prohibits any form of retaliation against any person who makes a good faith report or complaint about perceived acts of harassment, discrimination, or concern, or who cooperates in an investigation of harassment, discrimination, or a concern. Any person who is found to be engaging in any kind of retaliation will be subject to appropriate disciplinary action.

7. Miscellaneous

The Goodwill Excel Center may approve modification of the foregoing procedures in a particular case if the modification (a) is for good cause, and (b) does not violate due process rights or policies of the DC Public Charter School Board.

Grievants also have the right to file a complaint with the Office for Civil Rights by: (1) mailing the complaint to Director, District of Columbia Office, Office for Civil Rights (OCR), U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202-1475; (2) faxing it to (202) 453-6021; or (3) filing it electronically at: www.ed.gov/ocr/complaintprocess.html. For more information, you can contact OCR at (202) 453-6020 (voice), (877) 521-2172 (TDD), or ocr.dc@ed.gov.

GEC's board member contact for purposes of this Grievance Policy is:

Catherine Meloy
Board Member
2200 South Dakota Ave, NE
Washington, D.C. 20018

Catherine.Meloy@dcgoodwill.org
(202) 715-2603

SAFEGUARDING OF STUDENT INFORMATION (FERPA) POLICY

Purpose: To clarify the restrictions on disclosure of students' education records under the Family and Educational Rights Privacy Act ("FERPA") for the Goodwill Excel Center, Public Charter School ("School") and its employees.

Policy: The School may not release personally identifiable information contained within student education records to a third party unless such release is expressly permitted under FERPA. A student's education records under FERPA include all records directly related to the student and which are maintained by a School. Records covered by FERPA therefore include, but are not limited to: grades, report cards, transcripts, attendance information, academic appeals, and records of any disciplinary proceedings. This list is not exhaustive and is provided only as an example of the wide range of information considered to be an "education record" under FERPA.

Definitions:

Eligible Student: A student 18 years of age or over. (Eligible Students have FERPA consent rights.)

Parent: A parent or legal guardian of a student at the School who is under the age of 18, or a legal guardian of a student at the School who is 18 years of age or over.

Procedures:

Annual Notification

The School will provide annual notification to Parents and Eligible Students of their rights under FERPA.

Disclosure

The School will protect the privacy of all student education records and will not disclose personally identifiable information within student education records to anyone other than the Parent or Eligible Student unless (1) the Parent or Eligible Student has provided prior written consent of such disclosure using a "Consent to Disclose Student Education Records" form available from the School Registrar or other authorization form approved by the School's General Counsel; (2) the information to be disclosed has been classified as "directory information" in the School's annual FERPA notification (described further below); or (3) the disclosure is permitted under one or more FERPA exceptions, some of which are presented below, but must be specifically determined to apply in a particular circumstance by the School's administration before the disclosure occurs.

Consent to Disclose Student Education Records Form (“Consent Form”)

Unless the requested records are not covered by FERPA, have been classified “directory information” in the annual FERPA notification, or another exception applies, a Parent, or Eligible Student must provide advance written permission to release the student’s education records to an outside third-party. The Parent’s or Eligible Student’s permission must be given through completion of the Consent Form available from the School Registrar. No information may be released beyond the scope of the permission as indicated in the form.

Once completed, the signed Consent Form will be kept in the School’s records. Parents or Eligible Students may revise their consent at any time during the year by completing a new form.

No form shall be effective for more than one academic year.

Directory Information

Allowable Information

The School may disclose student information that has been classified as “Directory Information” in its annual FERPA notification. Directory information refers to information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed.

Directory information includes, but is not limited to, the following student information:

1. Student name
2. Address and telephone number
3. E-mail address
4. Photograph
5. Date and place of birth
6. Grade level
7. Dates of attendance
8. Participation in officially recognized activities
9. Degrees, honors, and awards received

Directory information cannot include a student’s Social Security number. A student’s ID number or user ID can be considered directory information, but only if that identifier cannot be used to gain access to the student’s education records without utilizing a password or personal identification number.

Annual FERPA Disclosure Regarding Directory Information and Opt Out Option

In order for the School to disclose directory information, it must first provide public notice in an annual FERPA notification to Parents and Eligible Students of the following:

1. The types of personally identifiable information that is designated as directory information;
2. A Parent’s or Eligible Student’s right to refuse the designation of any or all of those types of information about the student as directory information; and

3. The period of time within which a Parent or Eligible Student has to notify the School in writing that he or she does not want any or all of those types of information about the student designated as directory information.

The required annual FERPA notification can be provided within other informational documents sent by the School or as separate School correspondence.

Exceptions

Allowable Disclosures

There are several exceptions that permit the release of student education records under FERPA. The following are some common examples of parties who can receive disclosures without the student's written consent in a manner that does not violate FERPA:

1. A contractor, consultant or volunteer to whom the School has outsourced institutional services or functions, if the party is under the direct control of the School and has met the Third-Party Requirements described below.
2. Other schools, school districts or institutions of postsecondary education in which the student is seeking to enroll or to transfer credits.
3. Authorized representatives of the DC Public Charter School Board (PCSB), the District of Columbia Office of the State Superintendent of Education ("OSSE"), U.S. Department of Education ("DOE"), the U.S. Attorney General ("AG"), or the U.S. Comptroller General ("USCG") for audit, evaluation, or compliance activity with respect to Federal or state education programs.
4. Organizations conducting studies for, or on behalf of, PCSB, the School, or another governmental entity provided such organization has met the Third-Party Requirements described below.
5. Schools' accrediting agencies.
6. To appropriate parties, if necessary to protect the health or safety of a student or other individuals.
7. To comply with a judicial order or lawfully issued subpoena.

Responses to requests for student records can be made to the third-parties identified above.

Recordkeeping Requirements

Unless the disclosure is to a school official as defined in 34 CFR 99.31(a)(1), a record of any disclosure must be made in the students' education records, which describes: (1) the party or parties who received the students' records; and (2) the legitimate interests of the party or parties had in requesting and obtaining the information. In the event that the disclosure is to an authorized representative of the PCSB, School, OSSE, the DOE, AG, or USCG, the record of the disclosure may be made by class, school, or other appropriate grouping. (For example, if OSSE requested all student records from the School, a record could be made indicating that

the entire School's student records were provided, rather than placing a record in each student's file.)

Notification Requirements

If the School receives a judicial order or lawfully issued subpoena, there may be certain notification requirements it must make before disclosing the students' records. The Parent or Eligible Student may need to be notified of the order or subpoena in order to be given an opportunity to seek protective action. Upon receipt of any judicial order or subpoena (whether it requests student education records or not), immediately notify the School's General Counsel ((202) 719-1235).

Third-Party Requirements

If the School discloses student records that contain personally identifiable information to a contractor or consultant who is a school official as defined in 34 CFR 99.31(a)(1), the School and the contractor or consultant must enter into a written agreement that specifies that the contractor or consultant will not disclose the information to any other party without the prior consent of the Parent or Eligible Student.

If the School discloses student records that contain personally identifiable information to a research organization, a written agreement must be entered into. The agreement must specify the following:

1. The type of student records to be disclosed to the authorized representative;
2. The purpose for which the student records are being disclosed;
3. A requirement that the authorized representative must destroy any personally identifiable information when it is no longer needed for the purpose specified, and a time period in which the information will be destroyed; and
4. Policies and procedures to protect personally identifiable information within the students' records from re-disclosure and unauthorized use by the authorized representative.

Health and Safety Emergencies

The School may disclose student education records that contain personally identifiable information to appropriate parties, including parents of a student, in connection with an emergency, if necessary to protect the health or safety of students or other individuals as determined by the School's President & CEO, VP of Mission Services or General Counsel. In disclosing student records, a determination must be made that there is a clear and significant threat to individuals' health or safety. If a disclosure is made due to a health or safety emergency, the School must record a description of the significant threat to students or other individuals that formed the basis for the disclosure, and the parties who received the information.

Other FERPA Requirements:

Right to Request Inspection of Student Records

Every Parent or Eligible Student shall be allowed to personally inspect copies of his or her records upon request. The School shall either provide copies of student records to

Parents and Eligible Students upon request, or make arrangements to allow for inspection of requested records within 45 days of when the request was received.

A reasonable fee for copies of student records may be charged, but not if imposition of a fee will prevent the Parent or Eligible Student from receiving copies of the records. No fee may be charged solely in order to search for or retrieve a student's education records.

Right to Request Amendments to Records and Hearings

If a Parent or Eligible Student believes that the education records maintained by the School relating to the student contains information that is inaccurate or misleading, he or she may ask the School Registrar, in writing, to have the records be amended. If, based on that written statement, the School decides not to amend the records as requested it must inform the Parent or Eligible Student of its decision and the right to a hearing. The hearing may be conducted by any School staff who was not involved in the initial decision not to accept the Parent's or Eligible Student's request to amend the relevant records.

In the event of a hearing, if the School staff who conducted the hearing decides that the information in question is inaccurate or misleading, it must direct relevant staff to amend the records accordingly and inform the Parent or Eligible Student of the amendment in writing. If, on the other hand, School staff decides that the information is not inaccurate or misleading, it must provide its decision in writing and inform the Parent or Eligible Student of the right to place a statement in the records commenting on the contested information. School staff's decision must be based solely on the evidence presented at the hearing, and must include a summary of the evidence and the reasons for the decision.

Reasonable Protection of Student Information

The School will permit School employees to obtain access to only those education records in which they have legitimate educational interests. The School will use physical and technological access controls for controlling access to education records.

Annual Notification of Rights under FERPA

The Family Educational Rights and Privacy Act (FERPA) affords parents and students who are 18 years of age or older ("Eligible Students") certain rights with respect to the student's education records. These rights are:

1. The right to inspect and review the student's education records within 45 days after the day the Goodwill Excel Center, Public Charter School ("School") receives a request for access.

Parents or Eligible Students who wish to inspect their child's or their education records should submit to the School Registrar a written request that identifies the records they wish to inspect. The school official will make arrangements for access and notify the parent or Eligible Student of the time and place where the records may be inspected.

2. The right to request the amendment of the student's education records that the parent or Eligible Student believes are inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

Parents or Eligible Students who wish to ask the School to amend their child's or their education record should write the School Registrar, clearly identify the part of the record they want changed, and specify why it should be changed. If the School decides not to amend the record as requested by the parent or Eligible Student, the School will notify the parent or Eligible Student of the decision and of their right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the parent or Eligible Student when notified of the right to a hearing.

3. The right to provide written consent before the school discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

One exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A school official typically includes a person employed by the School as an administrator, supervisor, instructor, or support staff member (including health or medical staff and law enforcement unit personnel) or a person serving on the school board. A school official also may include a volunteer, contractor, or consultant who, while not employed by the School, performs an institutional service or function for which the School would otherwise use its own employees and who is under the direct control of the School with respect to the use and maintenance of PII from education records, such as a business that provides a cloud hosting services for School data, an attorney, auditor, medical consultant, or therapist; a parent or student volunteering to serve on an official committee, such as a disciplinary or grievance committee; or a parent, student, or other volunteer assisting another school official in performing his or her tasks. A school official typically has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

Upon request, the School discloses education records without consent to officials of another school or school district in which a student seeks or intends to enroll, or is already enrolled if the disclosure is for purposes of the student's enrollment or transfer.

4. The right to file a complaint with the U.S. Department of Education concerning alleged failures by the School to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

The School may disclose appropriately designated “directory information” without written consent, unless you have advised the School to the contrary in accordance with School procedures. The primary purpose of directory information is to allow the School to include information from the student’s education records in certain school publications.

Directory information, which is information that is generally not considered harmful or an invasion of privacy if released, can also be disclosed to outside organizations without a parent’s or Eligible Student’s prior written consent. In addition, two federal laws require local educational agencies (LEAs) receiving assistance under the Elementary and Secondary Education Act of 1965, as amended (ESEA) to provide military recruiters, upon request, with names, addresses and telephone listings of students unless Eligible Students or parents have advised the LEA that they do not want the student’s information disclosed without their prior written consent.

If you do not want School to disclose any or all of the types of information designated below as directory information from the student’s education records without your prior written consent, you must notify School in writing within the later of: (a) 14 days after the student’s first day of class at the School; or (b) 14 days after the first day of the School year. The School has designated the following information as directory information:

1. Student name
2. Address and telephone number
3. E-mail address
4. Photograph
5. Date and place of birth
6. Grade level
7. Dates of attendance
8. Participation in officially recognized activities
9. Degrees, honors, and awards received

Directory information cannot include a student’s Social Security number. A student’s ID number or user ID can be considered directory information, but only if that identifier cannot be used to gain access to the student’s education records without utilizing a password or personal identification number.

OPEN BOARD MEETINGS POLICY

One meeting each year of the GEC board includes a time that is open for students, parents or other members of community to make comments directly to the GEC board. The meeting is usually held in November or December and notice of the date, time and location of the meeting is posted on GEC’s website during the week before the meeting.