



SACRAMENTO CITY UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION

Agenda Item # 8.1d

Meeting Date: March 20, 2014

Subject: Coherent Governance Operational Expectations 7 (OE-7) – Asset Protection

- Information Item Only
- Approval on Consent Agenda
- Conference (for discussion only)
- Conference/First Reading (Action Anticipated: _____)
- Conference/Action
- Action
- Public Hearing

Division: Administrative Services

Recommendation: Approve Coherent Governance Policy Operational Expectations 7 (OE-7) – Asset Protection

Background/Rationale: The Board has directed the Superintendent to provide Monitoring Reports on a regular schedule at open session Board meetings. Monitoring determines the degree to which Board policies are being met. This report is designed to share progress toward the results the Board expects to see for the school system, as well as the effectiveness of the system's operations. This report, therefore, is a review of the organization's performance as it relates to Operational Expectations 7 – Asset Protection.

The report includes the following information:

- The policy.
- The Superintendent's certification.
- Reasonable Interpretation of the policy.
- Evidence of compliance.

After the Board meets in open session to discuss the report, two additional sections of the report will be completed by the Board chair:

- Disposition of the Board. (The policy is found by the Board to be "in compliance," "in compliance with exceptions," or "not in compliance.")
- Comments.

The Board will discuss the data and conclusions from the Monitoring Report in open session. At the end of the discussion, the Board will vote as to whether it will accept the report, as presented, as evidence of reasonable interpretation and reasonable progress toward achieving the Board's policy. The Board will determine whether the policy is "in compliance," "in compliance with exceptions," or "not in compliance." If the policy is found to be "in compliance with exceptions," or "not in compliance," the Board has the option to direct the Superintendent to correct the non-compliance indicators and report back to the Board at a time outside the regular monitoring schedule.

Financial Considerations: None.

Documents Attached:

1. OE-7 Monitoring Report

Estimated Time of Presentation: 5 minutes

Submitted by: Cathy Allen, Associate Superintendent, Facility Support

Approved by: Sara Noguchi, Ed.D, Interim Superintendent

SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
Operational Expectation Monitoring Report
OE-7: Asset Protection
March 11, 2014

PART I: THE POLICY

OE-7: Asset Protection

The Superintendent will assure that all organizational assets are adequately protected, properly maintained, appropriately used and not placed at undue risk.

PART II: SUPERINTENDENT'S CERTIFICATION

I certify that the information in this report is true for the period beginning March 2013 and ending March 2014.
Based on this report, I believe the school system is

- In compliance
- In compliance with exceptions
- Not in compliance

Signed: _____ Date: _____
Sara Noguchi, Ed.D., Interim Superintendent

PART III: DISPOSITION OF THE BOARD

Based on this report and our discussion, the Board of Education finds this OE policy to be

- In compliance
- In compliance with exceptions
- Not in compliance

Signed: _____ Date: _____
Patrick Kennedy, Board President

PART IV: COMMENTS

PART V: INTERPRETATION

I interpret this to mean that assets – physical, intellectual and financial – shall be protected from loss or damage through adequate security, controls and preventive maintenance. Additionally, sufficient indemnity protection will be maintained so that assets are protected in such a manner that the district's financial position, legal position and public image are not susceptible to damage.

OE-7.1: The Superintendent will maintain adequate property and casualty insurance coverage on district property consistent with industry standards.

Interpretation:

I interpret this to mean that the district will purchase insurance, or will have adequate resources and legal mechanisms in place to self-insure, to replace or repair insured buildings and their contents in the event they are damaged or destroyed. The coverage will provide for 100 percent of current replacement values, less deductibles, to minimize the financial impact to the district's operating budget.

Indicators for Compliance:

- Indemnity protection policies in place providing all-risk property coverage equal to 100 percent replacement value subject to a basic deductible of \$25,000 per covered occurrence.
- Boiler and machinery coverage is included to a \$25,000 per occurrence deductible except for designated losses and perils

EVIDENCE OF COMPLIANCE March 21, 2013 to March 5, 2014
<ul style="list-style-type: none">• The district participates in the Schools Insurance Authority all-risk property coverage, which provides coverage under current Memorandum of Coverage equal or better to compliance indicators above.

Compliance Status	In Compliance
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OE 7.2: The Superintendent will maintain both Errors and Omissions and Comprehensive General Liability insurance coverage protecting Board members, staff and the district itself in an amount that is reasonable for school districts of comparable size and character.

Interpretation:

I interpret this to mean that the district will purchase and maintain adequate indemnity protection coverage that will defend and indemnify all Board members, staff and the district itself against the risk of financial loss resulting from third-party legal action or challenge. Additionally, the district will maintain indemnity protection to protect the district from claims from employees. The district will also maintain appropriate Workers' Compensation coverage to satisfy state statutory requirements and address the fiscal liabilities arising from workplace injuries and illness. The amounts of coverage under these indemnity agreements will be consistent with and benchmarked against the limits of coverage held by similarly sized school districts located in California and other states throughout the nation. The limit of liability, and the extent of coverage, will also be compliant with California laws and regulations.

Indicators for Compliance:

- Liability and Workers' Compensation Indemnity protection in place which meets or exceeds California law and regulations
- Participation in Schools Insurance Authority Board to monitor loss control and rates

EVIDENCE OF COMPLIANCE March 21, 2013 to March 5, 2014
<ul style="list-style-type: none">• The district participates in Schools Insurance Authority liability, which provides coverage under current Memorandum of Coverage equal or better to compliance indicators (\$25,000 deductible for property claims, per covered occurrence).• The district participates in Schools Insurance Authority workers' compensation pool, which

provides coverage under current Memorandum of Coverage equal or better to compliance indicators.

Compliance Status	In Compliance
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OE 7.3: The Superintendent will assure that all personnel who have access to material amounts of district and school funds are bonded.

Interpretation:

I interpret this to mean that the district will protect itself by providing fidelity and crime coverage applicable to circumstances in which district employees or their agents handle cash or certain types of asset transactions in the performance of the district's operations.

Indicators for Compliance:

- Fidelity bond coverage in place with sufficient limits, subject to a \$5,000 deductible per covered loss

EVIDENCE OF COMPLIANCE

March 21, 2013 to March 5, 2014

- The district participates in Schools Insurance Authority liability, property and workers' compensation pool, which provides coverage under current Memorandum of Coverage equal or better to compliance indicators.

Compliance Status	In Compliance
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OE 7.4: The Superintendent will protect district owned intellectual property, information, files, records and fixed assets from sale for personal profit, loss or significant damage.

Interpretation:

I interpret this to mean that data and all fixed assets owned by the district will be protected from loss or damage. This responsibility includes the security of personal information and data, and work product. The cost to provide this protection shall be reasonable in accordance with the risk. Intellectual property is defined as property rights created through intellectual and/or discovery efforts of a creator that is generally protectable under patent, trademark or copyright. Fixed assets are tangible property used for the operation of business, such as buildings, machinery, fixtures, furniture and equipment.

Indicators for Compliance:

- Procedures in place to protect paper files
 - All sites that hold employee and student data have card or key access limited to authorized employees.
 - A vault in Business Services holds all permanent property records.
 - Paper records are being replaced with electronic records as much as possible.
 - Contract for confidential document destruction is in place and utilized.
- Procedures are in place to protect fixed assets
 - Fire and security alarms are in place for all district buildings and are monitored at all times.

- Inventory of capital assets is conducted once every three years. One third of the District is inventoried each year.
- Procedures are in place to back up and protect electronic files
 - Conduct Information Technology Audits to verify that the security is being strictly followed per district policies and procedures.
 - Security certificates for district applications guarantee a secure computing environment.
 - All electronic intellectual property, information, files and records are stored on a secure internal network. Security to the network is through individual login and password. Any information accessed through our district web portal is accessed via a secure socket layer (encrypted) connection. Internal security levels within all of our systems screen access on a need-to-know basis. All staff who have access to private and confidential data are fully trained on the data practice laws.
 - All electronic records and data are backed up on a nightly basis.
- Reported losses through Information Technology, Police and Risk Management are evaluated and corrective actions taken.

EVIDENCE OF COMPLIANCE

March 21, 2013 to March 5, 2014

- The vault on the second floor of the Serna Center holds all permanent property records. Confidential file shredding takes place on a regular basis either by district staff or an outside firm. A contract for inventory of capital assets is in place with 1/3 of the capital assets inventoried each year.
- All district buildings have functioning fire and intrusion alarms. These systems are monitored 24 hours a day. Fire alarm systems are monitored by the Sacramento Regional Fire/EMS Communications Center. Intrusion alarms are monitored by Astro Security Monitoring Co.
- The district network engineer, in conjunction with Tech Services leadership, meets weekly to review operational security procedures and practices. Network engineers, as part of their daily routine, examine systems and security logs for breaches.
- All district applications and websites accessible to public users outside of the district network are secured with SSL encryption security certificates purchased through the vendor, Thawte.
- On the internal portion of our district network, all servers communicate securely through Microsoft's internal certificate authority server.
- Security for all users to the network is delivered through individual login and complex password using Microsoft's Active Directory.
- Microsoft's Active Directory security services provide file level security permissions designated to appropriate users through individual and security groups.
- Tech Services grants, monitors and audits secure and appropriate access to data by individual users and groups. Tech Services relies on district departments to provide training to their staff to be current on data practice laws.
- Any losses and thefts to Information Technology are reported and evaluated and corrective action is taken up to and including reporting to Police and Risk Management authorities.
- Using Microsoft's Data Protection Management System (DPM), data backups of electronic records and data are performed on a nightly basis.
- Using Microsoft's Data Protection Management System (DPM) and industry standard best practices, data backups of electronic records and data are performed on a nightly basis.
- The district files crime reports with the appropriate law enforcement agencies when there is evidence of theft.

- The Legal Services Department contains confidential employee and student data in hard-copy and in electronic form. The Legal Services Department has locking offices and file cabinets that only Legal staff and Superintendent staff have access to. All electronic files are kept on a separate computer server (P: drive) that only Legal staff and selected Technology Services staff have access to.
- Servers containing information that belong to the Legal Services Department are accessible to appropriate personnel through the use of key cards. Electronic information and files are protected through the use of Microsoft’s Active Directory security services, which provide file level security permissions designated to appropriate users through individual and security groups.
- The Legal Services Department is currently retrieving archived hard-copy files from our off-site storage company (Iron Mountain) to reduce costs for storage. Records falling outside the retention period of 10 years are put into locked shred bins that are picked-up and destroyed by Iron Mountain. Pertinent records falling inside the retention period are being scanned to electronic files.
- The Legal Services Department has a separate computer server (P: drive) that only Legal staff and selected Technology Services staff have access to. Legal staff has access through individual login and password. Legal staff is informed of the confidential nature of the records and files contained in the Legal Services Department and are provided training and legal updates as to the most up-to-date laws regarding access to records. The P: drive is backed-up nightly by the Technology Services staff, along with all district data housed on district servers, using Microsoft’s Data Protection Management System (DPM). All software and files are on the P: drive.

Compliance Status	In Compliance
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OE 7.5: The Superintendent will not allow facilities and equipment to be subjected to improper use or insufficient maintenance.

Interpretation:

I interpret this to mean that the district must ensure that all facilities and equipment of the district (such as buildings, computers, vehicles, boilers and air handling units) are used in a manner for which they were intended by the district and maintained with an appropriate service cycle so that their full life and value are optimized. The district will ensure that sufficient protection and supervision of all facilities and equipment is in place.

Indicators for Compliance:

- Facilities and equipment such as computers, vehicles, boilers, air handling units and portable buildings routinely exceed their expected useful life.
- Maintenance staff, technology staff, Nutrition Services staff and school bus mechanics keep detailed records for maintenance schedules for all equipment.
- Safety and Facilities inspections are completed; deficiencies are identified and corrected.
- Annual Williams Settlement and School Accountability Report Card (SARC) facility inspections reflect “good” or higher ratings.
- Preventative maintenance programs are in place and executed.

EVIDENCE OF COMPLIANCE

March 21, 2013 to March 5, 2014

- Boilers, air handling units (AHU) and modular buildings routinely exceed their useful life.
 - The average useful life of a typical boiler is 40 years.
 - The Sutter School boiler is 56 years old
 - The A. Warren McClaskey School boiler is 91 years old
 - The Sacramento High School boiler is 88 years old
 - The average useful life of a typical air handling unit is 30 years
 - California Middle School has AHUs that are 42 years old
 - McClatchy High School has AHUs that are 76 years old
 - Kit Carson Middle School has AHUs that are 38 years old
 - American Legion High School has AHUs that are 37 years old
 - Marian Anderson site has AHUs that are 38 years old
 - Washington Elementary School has AHUs that are 38 years old
 - The average useful life of a Forced Air HVAC system is 20 years
 - Father Keith B. Kenny has Forced Air HVAC systems that are 21 years old
 - Golden Empire has Forced Air HVAC systems that are 37 years old
 - Matsuyama has forced air HVAC systems that are 21 years old.
 - The average useful life of the typical modular building is 20 years.
 - Oak Ridge Elementary School's Room 12 is 55 years old
 - California Middle School's Room B1 is 27 years old
 - Sacramento High School's Room P20 is 59 years old
- The above examples have exceeded their life expectancy because annual preventive maintenance service has not been performed due to budget constraints. To ensure the systems are operating at peak efficiency and within manufacturer specifications and Title 24 (California Energy Code) an ongoing funding stream needs to be identified.
- Maintenance staff keeps detailed equipment records for backflow testing equipment, underground storage tank monitoring, air compressors, backup generators and boiler maintenance.
- Transportation Vehicle Maintenance Supervisor performs monthly inspections on underground storage tanks. Yearly inspections are done by BZ Service Company. Buses are inspected daily by the driver, every 3,000 miles or 45 days by shop personnel and annually by California Highway Patrol. Detailed records are stored at the Transportation Facility, 3101 Redding Ave.
- Technology Services engineers maintain and review various detailed electronic systems logs monitoring the performance, security and incident events on servers, storage devices, switches, firewalls and other District data center systems.
- Nutrition Services staffs a dedicated equipment maintenance employee that keeps equipment records and repair requests for kitchen cooler/compression, ovens, stoves and kitchen repair requests/work orders, equipment warranty records and specifications as well as records for maintenance for Nutrition Services transportation fleet.
- Safety and Facility inspections are completed on an annual basis. Any deficiencies noted during the inspections are reported and corrected via the work order process.
- Seventy-one annual Williams Settlement and SARC facility inspections were completed this year. The ratings are as follows:
 - Exemplary -- 49
 - Good -- 22
 - Fair -- 0
 - Poor -- 0
- Facilities Maintenance maintains a preventive maintenance program that consists of annual inspections for the following building systems: HVAC, boilers, fire extinguishers, alarm devices,

hazardous materials and plumbing systems. The preventive maintenance program has been severely curtailed due to funding constraints. Systems are serviced in priority order with Fire, Life & Safety issues addressed first. All inspection reports are maintained and available for review at the Facilities Maintenance Department.

Williams Inspections

School	WO#	Craft	Work Description
Abe Lincoln	23552	Carpenter	Repair bark box kinder play ground
	23889	Electrical	7 ballast room Library
	23891	Electrical	18 ballast cafeteria
	23892	Electrical	4 ballast room N-1
	23893	Electrical	2 ballast room N-2
Kit Carson	23425	Electrical	Ballast boys restroom on blacktop
Leataata Floyd	23195	Painting	Ceiling needs to be painted boys rr near room 8
	23197	Plumbing	3 loose faucets in girls rr by room 8
Hiram Johnson	23611	Carpenter	Cafeteria - ceramic tile missing around the drinking fountain
		Carpenter	Ceiling tile is stained in the music wing hallway
	23614	Painting	Stairwells in the auditorium lobby need paint
Bret Harte	23166	Carpenter	Door vent deteriorated on boys rr 001-T018
	23167	Painting	Box cutter marks in the paint above urinals boys rr 001-T018
	23172	Plumbing	Left urinal is broken - 002-T029
	23173	Plumbing	Middle faucet is broken T003
	23178	Plumbing	missing sprinkler between 26d and 31a
	23175	Painting	Paint is peeling in several areas T025
	23176	Electrical	Hand dryer directional operation is broken T025
	23177	Glazing	Mirrors are discolored T025
	23171	Glazing	Mirrors are discolored T018
	23179	Carpenter	Missing tile around the door frame T025
	23181	Electrical	Two bulbs out in the ceiling cans of the multi.
	23184	Laborer	Multiple cracks and uneven surface on black top
	23180	Electrical	Broken electrical outlet on the west wall
	23186	Plumbing	Drinking fountain bubbler not working near rm. 31
Ethel Phillips	23422	Plumbing	Middle bubbler does not work on the drinking fountain near rm.10
John Cabrillo	23420	Plumbing	Loose faucet BRR 003-T002
	23421	Plumbing	Loose faucet BRR 004-T001
A. M. Winn	23915	Electrical	Replace ballast in room 17A

Compliance Status	In Compliance
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OE 7.6: The Superintendent will not recklessly expose the district, the Board or staff to legal liability.

Interpretation:

I interpret this to mean that the Superintendent will not knowingly take actions or require others to take actions that are “reckless,” or careless to the point of being heedless of the consequences, and would expose the district, Board members or staff to legal liability. Appropriate steps will be taken to pre-empt unnecessary exposure or liability on behalf of the district, Board members and staff. The district will maintain a system of guidance and processes to protect against legal missteps.

This provision does not mean that when legal challenges arise during the normal course of business that the district is necessarily out of compliance.

Indicators for Compliance:

- Contracts are in place with outside law firms which specialize in particular areas of education law. Firms are consulted as necessary.
- The Superintendent routinely seeks advice from legal counsel in a proactive and intentional manner in order to pre-empt unnecessary legal exposure. In the event of a legal challenge or exposure, the Superintendent seeks advice from legal counsel to appropriately bring resolution to the challenge.
- Any significant legal challenges are discussed with all Cabinet and Board members.
- District procedures such as criminal background checks, harassment training, Right-to-Know training (infectious disease, hazardous wastes and products), Fair Labor Standards Act Training, and Fair and Respectful hiring practices are in place to protect employees, students and the district from harm and legal liability.
- Support staff is in place and routinely consulted (Legal, Risk Management and Human Resources).

EVIDENCE OF COMPLIANCE March 21, 2013 to March 5, 2014
<ul style="list-style-type: none">• The District contracts with the Lozano Smith law firm for outside legal services. The firm employs attorneys in all areas of law pertinent to school districts and government agencies. The attorneys are available to the Board, Superintendent, Cabinet members and Legal Services Department staff at any time as needed for advice guidance, and support. Examples are:<ul style="list-style-type: none">○ Planning and Construction –Advise district on CEQA legal requirements regarding school closures.○ Facilities/Maintenance – Provide legal analysis regarding use of bond proceeds.○ Contracts- Draft, review and revise contracts and Memorandums of Understanding with vendors for services to the District and partnerships with the District, such as the MetroPCS cell tower license agreement• The Superintendent provides information regarding litigation and other significant legal matters to the Board during Closed Session of the Board meetings. The Superintendent and Cabinet discuss legal matters during their weekly Cabinet meetings. Pending litigation cases include:<ul style="list-style-type: none">• <i>Aquisto et al. v SCUSD (Litigation pertaining to the 2012 certificated layoff Decision)</i>• <i>Chong Yang v. SCUSD (Petition for Writ of Mandate)Settled 13-14</i>• <i>SCTA v. SCUSD (Reemployment Writ)</i>• <i>Michael Kuntz v. SCUSD</i>• In addition the Superintendent receives a monthly update on all possible litigation or legal actions from Lozano Smith.• Lozano Smith attorneys provide guidance and training to district staff regarding employment/hiring practices, discrimination prevention (staff and student), required parent and staff notices, student expulsions, access to public records and student records, facility matters, Charter schools, and other pertinent matters, as needed, to assist in keeping the district from exposure to legal liability. Examples are:

- Back to School Legal Update trainings
- Facilities and Business Webinars: School Construction Law Update, September 19, 2013, Financing Public Construction , January 1, 2014,
- Labor and Employment Webinars: A Picture of Good Health: The Affordable Care Act, September, 18, 2013; Sorting It Out-Review of Certificated and Classified Employee Types, November 20, 2013; Leaving Isn't Easy- Review of Various Employee Leave Rights, February 12, 2014
- Student Webinars: Refresher Course – Search and Seizure and the World of Electronic Communications, September 16, 2013; Updates to Student Fee Rules, November 12, 2013; Gender Identity and Sexual Orientation, and the Rules, January, 12, 2014.
- The Legal Analyst III in the Legal Services Department is also a support person to the Board, Superintendent, Cabinet members and other district administrators and staff and is consulted as needed. Beginning in February 2014, the position of Manger II, Legal Services, was added to provide further support. Some examples of the support provided by Legal Services were:
 - March 7, 2013 provided information to Student Behavior and Placement office regarding record retention.
 - March 7, 2013 provided Maintenance Department with guidance on temporary disabled parking spaces.
 - March 14, 2013 provided information and support to the Human Resource Services Department regarding changes in the Uniform Complaint Procedures law in order to revised District policy.
 - April 5, 2013 reviewed a Withdrawal of Consent letter for Crocker Riverside Elementary School.
 - April 9, 2013 reviewed a Withdrawal of Consent letter and provided advice to John Cabrillo Elementary School.
 - April 9, 2013 prepared a response to a parent on behalf of the Superintendent.
 - April 12, 2013 assisted the Student Behavior and Placement office with their response to the State Audit.
 - April 16, 2013 provided the Athletics Department with guidance regarding consolidation of small high school's athletic teams.
 - May 13, 2013 provided Charter School Coordinator with advice about the National Association of Charter School Authorizing and the Brown Act.
 - May 14, 2013 provided advice to Human Resource Services and Technology Services regarding the District's cell phone policy.
 - May 16, 2013 provided review of MOU on the Drive4Arts MOU.
 - May 17, 2013 provided advice to Caleb Greenwood Elementary School regarding staff providing statements in a family court matter.
 - May 22, 2013 provided tips for being a witness to Child Development Director.
 - June 6, 2013 provided direction and sample of a Lybarger Warning to the Human Resources Department.
 - June 2, 2013 provided guidance to the Professional Development Department regarding record retention.
 - July 1, 2013 provided information and legal support to the Facilities Department and Rosemont High School regarding a land-use matter.
 - July 22, 2013 provided the principal of Kennedy High School with information on Board Policy and Administrative Regulations regarding environmental safety and hazardous substances.
 - July 24, 2013 provided the Student Behavior and Placement Office information about the District's Board Policies and Administrative Regulations regarding International Exchange students.
 - July 24, 2013 provided the Technology Department with the law regarding gifts of public

funds.

- August 20, 2013 reviewed the Generation Ready contract for the Academic Office and provided feedback.
- August 21, 2013 reviewed a Facebook posting for the principal of George Washington Carver and provided advice regarding a Withdrawal of Consent letter and a Temporary Restraining Order.
- August 26, 2013 drafted collection letter templates for the Accounting Department.
- September 11, 2013 provided information about the Board Policy revision process to the Health Services Department.
- September 17, 2013 provided information about Domestic Partner Affidavits to the Human Resource Services Department.
- September 24, 2014 provided Board Policy and Administrative Regulations regarding students repeating grades to an Area Assistant Superintendent.
- October 7, 2013 provided information about Title IX Notifications to the Human Resource Services Department.
- October 21, 2013 provided the principal of A.M. Winn Elementary School with guidance about parents making recordings in the classroom.
- November 6, 2013 provided the principal of Sutterville Elementary School with guidance about responding to a grandparent's attorney regarding volunteering at the school site.
- November 14, 2013 provided information and a template letter regarding registered sex offenders to the Child Development Department.
- November 19, 2013 proved a review and guidance on a custody issue at Sutter Middle School.
- December 4, 2013 provided Board Policies and Administrative Regulations to the principal of Crocker Riverside Elementary School regarding selling fundraising tickets on campus.
- January 8, 2014 provided a review of the Pathways MOU for the Linked Learning Coordinator.
- January 22, 2014 provided guidance to the Speech and Language Specialist regarding accepting services and responding to a subpoena.

Compliance Status

In Compliance

OE 7.7: The Superintendent will not invest funds in investments that are not secured or that are not authorized by law.
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Interpretation:

I interpret this to mean that the Superintendent will not invest district funds into investment vehicles that are deemed to be risky or illegal.

Indicators for Compliance:

- Compliance with Annual Statement of Investment Policy
- Quarterly Report to the Board regarding disclosure of district investments

EVIDENCE OF COMPLIANCE March 21, 2013 to March 5, 2014
<ul style="list-style-type: none"> • The County of Sacramento Treasurer invests District funds per their Investment Policy. Additionally, the annual external financial audit discloses cash investment information. • Quarterly investment reports were provided to the Board on . . . <ul style="list-style-type: none"> ○ February 2, 2013 ○ May 16, 2013 ○ August 2, 2013 and ○ November 21, 2013

Compliance Status	In Compliance
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OE 7.8: The Superintendent will not purchase or sell real estate, including land and buildings.

Interpretation:

I interpret this to mean that all real estate transactions must have Board approval before being executed.

Indicators for Compliance:

- Approved Board actions are provided to support all real estate transactions

EVIDENCE OF COMPLIANCE March 21, 2013 to March 5, 2014
<ul style="list-style-type: none"> • The Superintendent did not purchase or sell real estate, including land and buildings; therefore, no Board actions are provided.

Compliance Status	In Compliance
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OE 7.9: The Superintendent will not take any action that damages the district’s public image or credibility.

Interpretation:

I interpret this to mean that the Superintendent will not conduct business in a manner that jeopardizes the district’s public image through dishonest, illegal, unethical or imprudent practices.

This provision does not mean that in the normal course of doing business, when employees or community members are in disagreement with district actions or decisions that the district is necessarily out of compliance with this provision.

Indicators for Compliance:

- Implementation of timely and honest communications through recurring communications with parent and community stakeholder groups
- Annual external audit; staff complies with any findings

EVIDENCE OF COMPLIANCE

- Monthly stakeholder group meetings allow for timely and honest communication. Please see attached schedule.
- Weekly eConnection newsletters keep our parents and community stakeholder groups up to date with the latest district events and news. Past eConnection newsletters can be found at <http://www.scusd.edu/econnection>.
- The annual external audit was performed by Crowe Horwath. The report was on the December 12, 2013, Board agenda for information. Staff from Crowe Horwath made the presentation and responded to questions. Staff responses to findings are included in the audit report.

Compliance Status	In Compliance
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Sacramento City Unified School District

JAN 2013 – MARCH 2014 PARENT MEETING SCHEDULE

District Advisory Council (DAC) Executive Board	District Advisory Council (DAC)	Community Advisory Council (CAC)	Parent Teacher Association (PTA) Executive Board	Gifted and Talented Education (GATE)	District English Learner Advisory Committee (DLAC)	Parent Information Exchange (PIE)
No January Meeting	January 8, 2013	January 22, 2013	January 9, 2013	No January Meeting	January 16, 2013	January 28, 2013
February 5, 2013	February 12, 2013	February 26, 2013	February 6, 2013	No February Meeting	February 20, 2013	February 25, 2013
March 5, 2013	March 12, 2013	March 26, 2013	March 6, 2013	March 20, 2013	March 20, 2013	No March
April 2, 2013	April 9, 2013	April 23, 2013	April 3, 2013	No April Meeting	No April Meeting	April 8, 2013
May 7, 2013	May 14, 2013	May 28, 2013	May 1, 2013	May 7, 2013	May 15, 2013	May 13, 2013
June 4, 2013	June 11, 2013	June 26, 2013	June 5, 2013	No June Meeting	No June Meeting	No June Meeting
July 2, 2013	July 9, 2013	No July Meeting	No July Meeting	No July Meeting	No July Meeting	No July Meeting
August 6, 2013	August 13, 2013	No August Meeting	August 7, 2013	No August Meeting	August 7, 2013	No August Meeting
September 3, 2013	September 10, 2013	September 24, 2013	September 4, 2013	No September Meeting	No September Meeting	No September Meeting
October 1, 2013	October 8, 2013	October 22, 2013	October 2, 2013	October 28, 2013	No October Meeting	October 28, 2013
November 5, 2013	November 12, 2013	November 12, 2013	November 6, 2013	No November	November 13, 2013	November 18, 2013

				Meeting		
December 3, 2013	December 10, 2013	No December Meeting	December 4, 2013	No December Meeting	No December Meeting	No December Meeting
January 7, 2014	January 14, 2014	January 28, 2014	January 8, 2014	January 29, 2014	January 15, 2014	January 27, 2014
February 4, 2014	February 11, 2014	February 25, 2014	February 5, 2014	No February Meeting	February 19, 2014	February 24, 2014
March 4, 2014	March 11, 2014	March 25, 2014	March 5, 2014	No March Meeting	March 19, 2014	March 31, 2014
		April 22, 2014	April 2, 2014	April 9, 2014	No April Meeting	April 28, 2014
		May, 27, 2014	May 7, 2014		May 21, 2014	May 19, 2014
		June 24, 2014	June 4, 2014		June 4, 2014	No June Meeting