

Exhibit A

St. Isidore of Seville Catholic Virtual
School's revised charter-school
sponsorship application to the Oklahoma
Statewide Virtual Charter School Board
(May 25, 2023)



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Charter Application Revisions

05/24/2023

The following is the specific information requested by the State Virtual Charter Board in order to resubmit application for a charter on May 25, 2023. The information below is also included in the application in the various sections in which it applies.

1. **Lack of detail regarding the proposed school's special education plan, specifically its programs, services, and legal compliance. This can be found in Section 9 of the application.**

Special Education Support for diverse learners

Students enrolled in St. Isidore of Seville Catholic Virtual School Board will receive a Free and Appropriate Public Education in the Least Restrictive Environment to the maximum extent possible through a virtual education program.

Child Find

The Individuals with Disabilities Education Act (IDEA) 20 U.S.C. § 1412(a)(5)(A) states, to the maximum extent appropriate, all students with disabilities, 3 through 21 years of age, are to be educated with age-appropriate peers, both with and without disabilities. This process is known as the least restrictive environment (LRE). The LRE is the appropriate balance of settings and services to meet the student's individual needs. The Local Education Agency (LEA) must have an array of services and a continuum of alternative placements/educational setting options available to meet the individual LRE needs of each student (34 C.F.R. §§ 300.114 and 300.115). An appropriate LRE is one that enables the student to make reasonable gains toward goals identified in an Individualized Education Program (IEP). The student's IEP must indicate the individualized LRE placement. The IEP team must consider to what extent, if any, the student will or will not participate in the general education classroom environment, the general education curriculum, and extracurricular or other nonacademic activities. This provision includes students with disabilities placed in public or private institutions or other care facilities by the IEP team. Special classes, separate day school, and other removals of a student with a disability from the general education environment may occur only when the nature or severity of the disability is such that education in the general education class, even with the use of supplementary aids and services, cannot be achieved satisfactorily. [Child Find, Least Restrictive Environment, OSDE Handbook pg. 182](#)

Students who may not be performing in line with expected outcomes from the Archdiocesan Standards and Benchmarks which meet or exceed Oklahoma Standards and Benchmarks may be referred to the Student Support Team (SST) consisting of general education teachers, special education staff, and school administrators for review of data as screening of possible learning difficulties. A variety of methods may be used to screen students, including performance-based assessments, curriculum-based measures, daily classroom work, observations, developmental achievements, and kindergarten readiness measures, all of which are assessments or activities that would be given to all students. If through the screening, a student is identified as possibly having a disability or in need of special education services, parents may be asked for their consent to evaluate their child. Special education referrals for evaluation may be made by the parent for a variety of reasons, including but not

limited to academic and/or behavioral concerns. Students referred must be assessed within 45 days.

Multi-Tier System of Support (MTSS) Plan

St. Isidore of Seville Catholic Virtual School will implement comprehensive coordinated services and activities that provide educational and behavioral evaluations, services, and support. These services may include professional development for teachers and other staff, enabling them to deliver scientific research based academic and behavioral interventions. This may include scientifically based literacy instruction, and where appropriate, training on the use of adaptive and instructional software. Research based curriculum resources will be used and best practice in instructional strategies employed.

Students may be referred for special education evaluation by their parent/guardian, teacher, or the Student Support Team (SST). The team, consisting of general education teachers, special education staff, and school administrators will regularly review data on students that are not progressing as expected. The SST will consult with the parent/guardians and address struggling students' needs through the Multi-Tier System of Support (MTSS) which includes the Response to Instruction and Intervention (RtII) process and Positive Behavioral Intervention and Supports (PBIS). The teacher will implement and document interventions and the student's response to interventions. If a student is referred for an evaluation, the students' response to MTSS efforts are used as one data metric in the determination of special education eligibility. These interventions will not be used to delay or deny a parent/guardian-requested special education evaluation. A student's eligibility for special education and related services will be determined through assessments administered by a school psychologist, classroom data, review of records and parent and teacher input.

St. Isidore of Seville Catholic Virtual School may employ a school psychologist, or contract with a specialist to evaluate students for services. Parents may also secure their own qualified testing specialist to complete their child's evaluation if they choose. Such specialist could include:

Testing Service	Address	Phone
University Counseling Center The University of Oklahoma Goddard Health Center	620 Elm Ave, Ste. 201 Norman Oklahoma	405-325-2911
University Of Central Oklahoma (UCO) Learning and Behavior Clinic	301 S. Boulevard Edmond, OK 73034	Jeremy Medders 405-285-6671
Cathy Reim	13301 S. Pennsylvania Oklahoma City, OK 73170	405-659-1027

Keys Speech & Hearing Center, OU Health Sciences Center	825 NE 14th Oklahoma City, OK 73104	405-271-4214
Reach-Resources & Evaluation for Achievement	6033 Heirwich Manor Oklahoma City, OK 73132	Kim Dixon 405-722-3062
Paula Stanford – Learning Styles	6520 N. Western, Suite 101 Oklahoma City, OK 73116	405-524-4610
Child Study Center, OU-HSC	1100 NE 13th Oklahoma City, OK 73117	Darlene Harris 405-271-6824
Dr. Leslie Rundell	Lakeshore Tower 4301 NW 63rd St., Suite 102 Oklahoma City, OK 73116	405-848-2511
Encouraging Words Speech, Dyslexia	2949 W Hefner Rd Oklahoma City, OK 73120	Laura Gautreaux 405-578-4442
Elite Therapy	1505 Renaissance Blvd. Edmond, OK 73013	Dr. Miracle Goetz 405-340-7056
Dr. Sharon Mullins	2000 E 15th St Edmond, OK 73013	405-330-8733
Speech & Hearing Associates	2500 S. Broadway #200 Edmond, OK 73013	Linda Elliott 405-340-7056
Speech & Hearing Associates	2500 S. Broadway #200 Edmond, OK 73013	Linda Elliott 405-340-7056
Tulsa Developmental Pediatrics & Center for Family Psychology	4520 S. Harvard, Ste. 200 Tulsa, OK 74132	Marie Conley 918-743-3224
Tulsa Ritecare Childhood Language Clinic	9525 E 51st, #6 Tulsa, OK 74101	918-622-7064
McAlester Rite care Clinic	305 N. 2nd Street McAlester, OK 74501	918-426-2300
Oklahoma State University	Stillwater	Lisa Ashley, M.Ed. CCC-SLP

Speech Language Hearing Clinic (Sponsored by Ritecare: Guthrie Scottish Rite Masons)		
Heartspring- Testing for Autism	8700 E. 29th St. North Wichita, KS 76226	800-835-1043
Southern Methodist University Diagnostic Center For Dyslexia & Related Disorders	5236 Tennyson Parkway, Bldg. 4, Suite 108 Plano, TX 75024	Helen Macik 214-768-7323
Cornerstone Behavioral Health	1212 S. Air Depot, Ste 9 Midwest City, OK 73110	405-455-6868
Oklahoma Pediatric Therapy Center	1817 Commons Circle Ste A, Yukon, OK 73099	405-467-6782

Students determined in need of an itinerant or supplemental level of support will access the general education curriculum with accommodations and modifications as outlined in their IEP in the general education classroom with their typical peers. Special education and general education teachers will collaborate to make necessary accommodations and modifications. Students may receive more intense instruction in small groups (with or without general education peers) or one-on-one instruction and intervention, depending on the specific needs of the student and as described in the student's IEP. Students that qualify for the alternative state assessment, Oklahoma Alternative Assessment Program (OAAP), will utilize a comprehensive program using an alternative curriculum which will include core content, social skills instruction and daily living skills based on individual needs.

Alternative placements are considered when the current educational environment is no longer meeting the needs of the student and the IEP team determines that a student needs more intensive support and programming than what a virtual program can offer. Alternative placements can include center-based programs, approved private placements and/or home and hospital instruction.

Individualized Disability Education Act (IDEA) & Section 504 Rehabilitation Act

St. Isidore of Seville Catholic Virtual School Board estimates that 20% of the student population will require special education support and services. This estimate is based on a 2% increase on the available data for statewide virtual charter schools taken from the 2021

Oklahoma Virtual Funding Study. Data indicates at the time, 18% of virtual charter students qualified for special education services. ([OK Virtual Funding Study](#) p. 35, 2021)

St. Isidore of Seville Catholic Virtual School Board will comply with all applicable State and Federal Laws in serving students with disabilities, including, but not limited to, Section 504 of the Rehabilitation Act ("Section 504"), the Americans with Disabilities Act ("ADA"), the Individuals with Disabilities Education Act ("IDEA"), as well as Oklahoma Special Education Rules to the extent that it does not compromise the religious tenets of the school and the instructional model of the school. The proposed school administrative office will be ADA compliant.

Transfer/New Enrollment with existing IEP or 504

After a student's application for enrollment has been confirmed, families will be given the opportunity to inform the School if their child has an IEP or 504 Plan. The parent/guardian/adult student may provide a copy of the documents, or the St. Isidore of Seville Catholic Virtual School will request the documents from the previous school.

Upon enrollment, the Student Support Team will review the evaluation report and IEP from the previous school district. After consultation with the parent/guardian/adult student, the school will offer comparable services as outlined in the student's existing IEP. The Student Support Team will be convened within 10 instructional days of obtaining the IEP to adopt or amend the existing IEP. For a student with an existing 504 Plan, we will convene a Student Support Team meeting with the parent/guardian/adult student in a reasonable amount of time, but no later than 30 days after the obtainment of the 504 plan. In addition to being active participants in the IEP and 504 Student Support Team meetings, the parent/guardian/adult student will be provided with a copy of the Procedural Safeguards Notice on a yearly basis at minimum.

Eligibility for special education and related services as a young child shall be determined on the basis of multiple sources of information, including, but not limited to:

- Vision/hearing screening
- Health/medical information
- Adaptive behavior
- Social/emotional status
- General intelligence
- Academic performance (present levels)
- Communication status (speech/language functioning)
- Motor abilities
- Developmental history
- Observations of the student during instruction
- Historical review of the student's academic progress
- Interview(s) with parent(s) and teacher(s)
- Assistive Technology (AT)

A medical or health diagnosis does not automatically qualify a student for special education services under IDEA; but a group should consider the data as part of a comprehensive evaluation.

Student Service Team

Once consent is obtained from the parent, a group is formed to carry out the evaluation process. The members of each evaluation group may differ; however, there are specific members and skills that must be represented. Members include:

1. The parents of the student.
2. A general education teacher.
3. The special education Director
4. A special education teacher.
5. At the discretion of the parent or SISCVS, other individuals who have knowledge or special expertise regarding the student, including related services personnel as appropriate; and
6. Other qualified professionals, as appropriate.
 - a. Is qualified to provide, or supervise the provision of, specially designed instruction to meet the unique needs of students with disabilities.
 - b. Is knowledgeable about the general education curriculum; and
 - c. Is knowledgeable about the availability of resources of the public agency.
 - d. an individual who can interpret the instructional implications of evaluation results, who may also hold another position on the IEP team, such as a teacher.
 - e. At least one contracted person qualified to conduct individual diagnostic examinations of children, such as a school psychologist and/or a speech-language pathologist.

St. Isidore of Seville Catholic Virtual School will employ as possible or contract with professionals in the following categories to secure the necessary testing to determine if special education services are necessary for success:

1. Speech Pathologist
2. Occupational Therapy
3. School Psychologist
4. Vision and Hearing Screening Programs
5. Assistive Device Consultants

Parent Participation

If parent(s) cannot attend scheduled Student Service Team meetings, other methods may be utilized to ensure parent participation, including Zoom, or similar individual or conference telephone calls. Following evaluation and providing special education and related services to your child for the first time with parental consent, meetings may be conducted without a parent in attendance if St. Isidore of Seville Catholic Virtual is unable to convince the parent that they should attend and the school has a record of reasonable attempts to schedule meetings at a

mutually agreed on time and place. In these cases, Written Notice to Parents will be used to inform the parents of any group decision and reasons for that decision.

Timeline

Oklahoma has established a 45 school-day timeline. The timeline for conducting the initial evaluation starts upon receipt of written parental consent to conduct the evaluation and ends with the determination of eligibility for special education services. St. Isidore of Seville Catholic Virtual School will abide by the timeline in all but the following instances:

- a) The 45 school-day timeline does not apply to a public agency if: 34 CFR §300.301.
- b) The parent of the child repeatedly fails or refuses to produce the child for the evaluation; or
- c) If a child enrolls at SISVCS after an evaluation has begun at another district. SISCVS will make every attempt to make sufficient progress but will petition the parent for a mutually agreeable timeline for completion of eligibility.

The time between eligibility determination and implementation of the individualized education program (IEP) cannot exceed 30 calendar days. The IEP will consist of goals and benchmarks as outlined in the Oklahoma Special Education Handbook. [Oklahoma Special Education handbook, 2022](#)

Transitions in Education

Early childhood

Students discovered through Sooner Start and/or other child find systems transferring into the Kindergarten of St. Isidore of Seville Catholic Virtual School will:

1. Conduct an annual IEP Review Meeting and address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
 - b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
 - c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.

Intermediate Grades

As students transition into grades 3-5, it is imperative that students understand that the power to learn lies within them and that it is only a matter of finding the right strategies to ensure their success. This can be accomplished in several ways:

1. Conduct an annual IEP Review Meeting and address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
 - b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
 - c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.
2. Beginning of the year onboarding process (can be revisited after long breaks during the year)
 - a. Managing the collaborative process within the Google Suite
 - i. What is respectful discourse?
 - ii. How do we support our fellow classmates in a positive way?
 - iii. Understanding the Citing Process; giving credit where credit is due
 - b. Managing a synchronous and asynchronous schedule
 - i. How to plan the day and stick to it
 - ii. Understanding the concept of time; using alarms
 - c. Understanding that we are created for the good and in turn we give the good in what we do, the virtues of industriousness, kindness, perseverance, understanding, justice, fairness.
 - i. Turning in quality work: What is quality for them?
 - ii. Being prepared for class in dress, attitude, and course preparations
 - iii. Being a good classmate for others

Middle School

Students on an IEP transitioning from a self-contained classroom into a departmentalized middle school program will follow the process below in order to ensure that supports are in place to assist in a successful transition to the next level of education.

1. Conduct an annual IEP Review Meeting and will address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition

- b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
 - c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent;
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.
- 2. Beginning of the year onboarding process (can be revisited after long breaks during the year)
 - a. Managing the collaborative process within the Google Suite.
 - i. What is respectful discourse?
 - ii. How do we support our fellow classmates in a positive way?
 - iii. Understanding the Citing Process; giving credit where credit is due
 - b. Managing a synchronous and asynchronous schedule
 - i. How to plan the day and stick to it
 - ii. Understanding the concept of time; using alarms
 - c. Understanding that we are created for the good and in turn we give the good in what we do, the virtues of industriousness, kindness, perseverance, understanding, justice, fairness.
 - i. Turning in quality work: What is quality for them?
 - ii. Being prepared for class in dress, attitude, and course preparations
 - iii. Being a good classmate for others
- 3. Multiple Intelligence Assessment for all students-
 - a. Where are their natural strengths?
 - b. What is a weakness that can be developed?
 - c. College and career coursework designed to highlight various careers, professionals in those careers, and skills needed to develop this interest.

High School

Students on an IEP transitioning from middle school to the high school program will follow the process below in order to ensure that supports are in place to assist in a successful transition to the next level of education.

- 1. Conduct an annual IEP Review Meeting and will address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
 - b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level

- c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent.
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.
2. Beginning of the year onboarding process (can be revisited after long breaks during the year)
- a. Managing the collaborative process within the Google Suite.
 - i. What is respectful discourse?
 - ii. How do we support our fellow classmates in a positive way?
 - iii. Understanding the Citing Process; giving credit where credit is due
 - b. Managing a synchronous and asynchronous schedule
 - i. How to plan the day and stick to it
 - ii. Understanding the concept of time; using alarms
 - c. Understanding that we are created for the good and in turn we give the good in what we do, the virtues of industriousness, kindness, perseverance, understanding, justice, fairness,
 - i. Turning in quality work: What is quality for them?
 - ii. Being prepared for class in dress, attitude, and course preparations
 - iii. Being a good classmate for others
3. Multiple Intelligence Assessment for all students-
- a. Where are their natural strengths?
 - b. What is a weakness that can be developed?
 - c. College and career coursework designed to highlight various careers, professionals in those careers, and skills needed to develop this interest.

Post secondary

St. Isidore of Seville Catholic Virtual School will assist high school students on an IEP in the transition process from high school to post-secondary school environments utilizing the [Oklahoma Secondary Transition Guide](#) along with other college and career readiness resources to offer them potential options that will support their dignity as a person of God and help them realize their talents and skills.

1. Conduct an annual IEP Review Meeting and will address the following areas:

- a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
- b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
- c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
- d. Gather additional information about the student provided by the parent;
- e. The student's anticipated needs in the upcoming grade level
- f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.

3. Multiple Intelligence Assessment for all students-

- a. Where are their natural strengths?
- b. What is a weakness that can be developed?
- c. College and career coursework designed to highlight various careers, professionals in those careers, and skills needed to develop this interest.

Appropriate documentation will be provided to the parents, and all faculty and staff who have the designated approval for notification.

The Oklahoma Transition Guide, p. 10 provides a good illustration of the processes necessary to assist students transferring into post-secondary education, career, or other life situations. ([Oklahoma Transitions Guide](#))



English Learner support

Evaluations must consider the child's English language skills and ethnic background to ensure that the testing and evaluation will be equitable for children of any race or culture. Tests will be given in the native language or mode of communication that is most likely to give accurate information on what the child knows and can do academically, developmentally, and functionally, unless it is clearly not feasible. Upon enrollment in St. Isidore of Seville Catholic Virtual School, the parent/guardian will complete a Language Preference Form/survey to

ensure, to the ability possible, that communication and assessments are delivered in the student/family's native language.

St. Isidore of Seville Catholic Virtual School will meet the needs of English Language Learners as required by State and Federal law by increasing the English language proficiency (ELP) and academic language proficiency in content-area subject matter. The school will seek to employ teachers with the teaching ESL endorsement and will serve as the English learners' Teacher of Record. The EL teacher-to-student ratio is set at 1:35 in the school budget.

All English Learners in the St. Isidore of Seville Catholic Virtual School will have an English Language Acquisition Plan (ELAP) per state guidance, and the ELAP will be implemented with fidelity by all teachers and staff who work with the student. The ELAP will detail strategies, instructional and assessment accommodations, modifications, goals for the student, and results on the state and local assessment data. The ELAP will be updated annually or earlier if needed to reflect the student's language proficiency growth.

The ELAP will:

- Meet or exceed Oklahoma academic standards for the appropriate grade level of the ELs;
- Include EL instruction delivered by properly certified teachers who hold an Oklahoma ESL endorsement certificate or who are working in conjunction with ESL endorsed teachers;
- Provide equitable access to content for ELs at all language proficiency levels by providing research-based bilingual or sheltered instruction with fidelity; and
- Not limit the enrollment of ELs in any course or academic program for which they would otherwise be eligible.

EL students will be monitored for their progress throughout the school year and assessed annually using assessments that are recognized by World-Class Instructional Design and Assessment (WIDA). The WIDA Consortium is an educational consortium of state departments of education. Currently, 35 U.S. states and the District of Columbia, as well as Puerto Rico and the Northern Mariana Islands, participate in the WIDA Consortium. WIDA designs and implements proficiency standards and assessments for grade K-12 students who are English-language learners. WIDA is the organizer of the WIDA ACCESS and W-APT English language proficiency assessments. This is a federally mandated test for all EL students. There are no exemptions. Students who meet Oklahoma's exit criteria of at least a 4.8/6.0 on that assessment will be reclassified and exit EL services. Monitoring will continue. It is an Oklahoma mandate that **all EL students** in grades K-12 take tests appropriate to their grade level. SISCVS will make arrangements with students to take the test at a location near them.

The EL program will be reviewed annually based on local and state data of English Learners and the general student population and other overlapping subgroups such as special education and free and reduced lunch eligible students. The annual review will include looking at data regarding equitable representation, academic achievement, elementary and

secondary programming, professional learning and teacher capacity, family engagement, and resource allocation.

Language Instruction Educational Programs are plans for supporting students who qualify as English learners. The descriptions below provide a general overview of common interventions.

- **Transitional Bilingual Students** are taught core content and language fluency in their native language for varying periods of the day with the remainder of time focused on English language acquisition. The goal is to transition students to native English instruction within two to five years with no loss of content instruction. Classes may be self-contained or combined.
- **Dual Language or Two-way Immersion** Students are taught content and language fluency in two languages. The goal is fluency in two languages, and programs can last the duration of enrollment.
- **English as a Second Language (ESL) or English Language Development (ELD)** Students are provided supplemental individual or small-group instruction outside the general education classroom (e.g., “pullout” or ESL classes) with no native language support in either setting. Supplemental instruction can target language fluency and core content. The goal is to increase student success in mainstream, non- ESL supported general education classes which ELs should transition to in a reasonable amount of time.
- **Newcomer Programs** Students new to the U.S. are placed in classes that primarily emphasize English language acquisition. Instruction can be in English or can utilize a student’s native language through a translation application. The goal is to move the student toward English language proficiency as quickly as possible.
- **Content Classes with Integrated ESL Support** Students are provided core content instruction with no native language support in mainstream classes utilizing integrated ESL strategies (i.e., teachers trained in EL methods, use of EL paraprofessionals, etc.). The goal is to provide appropriate EL support in the general education classroom to the level appropriate for student success.

Limited English Proficient Parents

Notification of Language Assistance Services: Any parent who is limited in speaking, writing, or reading English may request the school to provide access to services such as interpreters and/or translated documents.

Gifted and Talented program

St. Isidore of Seville Catholic Virtual School will recognize and serve those enrolled students who qualify for the Gifted and Talented program at St. Isidore of Seville Catholic Virtual School in accordance with Oklahoma Regulations and Program Approval Standards for Gifted and Talented. (210:15-23-1 Oklahoma Regulations and Program Approval Standards for Gifted and Talented. [Rules and Regulations](#))

Students will be identified as gifted and talented through a process consistent with 70 O.S. 1210.301 for the purpose of funding through the gifted educational child count. This process will be nondiscriminatory with respect to race, economic background, national origin or handicapping condition. Parents will be involved in the process the entire time and will have the right to appeal a decision to the SISVCS Board. Either parents or teachers may recommend a student for the program. Students will be assessed utilizing a nationally standardized test of intellectual ability such as the IOWA Assessments or Terra Nova. Students who score in the top three percent (3%) on any nationally standardized test of intellectual ability means a composite, total or full-scale score in the 97th percentile or above, including the standard error of measure as denoted in each nationally standardized test of intellectual ability technical manual, will be nominated the program. Teacher recommendation, student work ethic, and other assessments, may also be considered in addition to the standardized test. (210:15-23-1.2 Oklahoma Regulations and Program Approval Standards for Gifted and Talented. [Rules and Regulations](#))

Gifted learners may benefit from individualized programming options to ensure appropriate challenge and engagement. SISCVS offers a variety of options to serve gifted and talented students:

- a) Flexible Pacing- based on course availability and the student services team approval, and/or teacher at the elementary and middle school levels
- b) Individualized Instruction
- c) Ongoing Assessment with MAP, Riverside Insights, and/or Beacon, national standardized testing for longitudinal growth data
- d) Proficiency-Based Promotion with qualifying assessment and progress depending on course availability and student services team approval
- e) Creative/Academic Competition through the OSSAA, Archdiocese of Oklahoma City, Diocese of Tulsa, online competitions
 - 1) American Mathematical Competitions
 - 2) Archdiocesan Spelling Bee, STREAM EXPO, History Fair
 - 3) Clean Tech Competition
 - 4) Destination Imagination
 - 5) Discovery Education 3M Young Scientist Challenge
 - 6) eCyberMission
 - 7) Kids Philosophy Slam
 - 8) MathCounts
 - 9) Meridian Stories
 - 10) MIT THINK Scholars
 - 11) National Academic Championship
 - 12) National Academic League
 - 13) Science Olympiad
- f) Concurrent enrollment opportunities in high school
- g) Honors classes in high school

Through the placement process, these learners will be provided the most appropriate curriculum, pacing and instructional methodology. Teachers will receive in-service opportunities

and CE credit for college coursework for training in order to work with students in areas of need, interest, and ability as related to their gifted and talented designation. Teachers will work closely with the parent/guardian and the St. Isidore of Seville Catholic Virtual School Student Services team to ensure a steady flow of enrichment activities for students working above grade level and/or within a special interest. Students will further benefit from the advantages of virtual gifted education as they will be able to work at their own pace without the restraints of traditional school classroom pacing. Records of placement decisions and data on all nominated students will be kept on file for a minimum of five years or for as long as needed for educational decisions, while providing strict confidentiality procedures. These records must include, but are not limited to: parent's written permission to test for individual assessments, written parental approval of program placement decisions, a procedure for parents to appeal placement or non-placement decisions (GEP), and individual student test composite score report (210:15-23-2e,f Oklahoma Regulations and Program Approval Standards for Gifted and Talented. [Rules and Regulations](#)).

Evaluation of the appropriateness of students' placement in gifted programming shall be ongoing, and written policies for removal from programming must include a procedure for conferencing with parents relative to any change in placement (210:15-23-2f Oklahoma Regulations and Program Approval Standards for Gifted and Talented. [Rules and Regulations](#)).

Neurodiverse Learners- Dyslexia, Dysgraphia, Dyscalculia

According to the statistics below taken from the National Center for Education Statistics website, the most common form of disability falls in areas of specific learning disability.

"15% of students fell into an IDEA category and of that group, 33% had a specific learning disability. A specific learning disability is a disorder in one or more of the basic psychological processes involved in understanding or using spoken or written language that may manifest itself in an imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations. Thirty-three percent of all students who received special education services had specific learning disabilities, 19 percent had speech or language impairments,² and 15 percent had other health impairments (including having limited strength, vitality, or alertness due to chronic or acute health problems such as a heart condition, tuberculosis, rheumatic fever, nephritis, asthma, sickle cell anemia, hemophilia, epilepsy, lead poisoning, leukemia, or diabetes). Students with autism, developmental delays, intellectual disabilities, and emotional disturbances each accounted for between 5 and 12 percent of students served under IDEA. Students with multiple disabilities, hearing impairments, orthopedic impairments, visual impairments, traumatic brain injuries, and deaf-blindness each accounted for 2 percent or less of those served under IDEA." [COE - Students With Disabilities \(ed.gov\)](#)

"In fall 2020, the percentage of students served under IDEA who spent 80 percent or more of the school day in general classes was highest for students with speech or language impairments (88 percent). Approximately two-thirds to three-quarters of students with specific learning disabilities (75 percent), developmental delays (69 percent), other health impairments (69 percent), and visual impairments (69 percent) spent 80 percent or more of the school day in general classes. Less than one-third of

students with deaf-blindness (28 percent), intellectual disabilities (19 percent), and multiple disabilities (15 percent) spent 80 percent or more of the school day in general classes.” [COE - Students with Disabilities \(ed.gov\)](#)

Reading ability affects every subject taught in school. Catholic schools address this on a regular basis by utilizing strong research-based programs incorporating strong early literacy, phonics, and writing based elements. In reviewing the reading proficiency for all Oklahoma students taking any reading assessment, the 2021-22 proficiency rate is 27.19%. This appears to be an area that St. Isidore of Seville Catholic Virtual School could help in the overall education of Oklahoma children by utilizing the Orton Gillingham approach to reading which addresses the five pillars of reading: Phonemic Awareness, Phonics, Fluency, Vocabulary and Comprehension. Training teachers for the expectation of having these common learning differences and addressing them with strong training programs is the intent of St. Isidore of Seville Catholic Virtual School. ([Orton-Gillingham | The Orton-Gillingham Approach](#), 2023)

Teacher training in the Science of Reading will be conducted through participation in various programs that are approved through the administration of the school and the Archdiocese of Oklahoma City. Programs used for training will meet the Knowledge and Practice Standards for Teacher of Reading as presented by the International Dyslexia Association. ([FINAL KPS FOR PUBLICATION May2018.pdf | Powered by Box.](#))

Examples of approved programs would be:

- 1) Payne Education Center: Certification Program for Dyslexia Specialist
- 2) Lindamood Bell: LiPs, Seeing Stars, Visualization and Verbalization, Cloud 9
- 3) Neihaus Institute: Neuhaus’ structured literacy curriculum, Concepts in Literacy, - Certification Program
- 4) Wilson Foundations
- 5) S.P.I.R.E.:
- 6) Literary First by Catapult: [Program Info](#)- This is not a certification program
- 7) LETRS: Language Essentials for Teachers of Reading and Spelling



The fundamental training in the Structure of Literacy grounded in the Science of Reading is crucial. These components can be found in this image from the International Dyslexia Association [Structured Literacy Roadmap](#) (2022)

At-risk/Academically Behind Learners

According to the Oklahoma Department of Education, Oklahoma children rank 5th in the nation for Adverse Childhood Experiences. Nearly half of all Oklahoma students have an

ACE score of 2 or higher, compared to less than 40% nationwide. More than half of all students in the state are at an economic disadvantage, with 56% of the population in poverty. Over 23 thousand students are homeless, 2,505 students come from foster care, and 199 are labeled as migrants. Over 11% of Oklahoma students have incarcerated parents, compared to just over 7% nationwide. (sde.ok.gov. Fast Facts,2022)

According to the American Psychological Association, all of these factors, and especially socio-economic status (SES) impacts quality of life, mental and physical health, as well as academic readiness and success. In fact, research tells us that a student's SES is "a statistically significant and strong predictor of learning-related behavior problems" and that these same children enter school with "fewer reading or mathematics skills and less well- developed learning-related behaviors" (Morgan, 2011). According to Aikens & Barbarin (2008), the schools in low- SES communities may not have the necessary resources, and as such, the academic growth of students is impacted. Upon entrance to high school, research has also found that low-SES students enter with as much as a 5-year gap in literacy skills compared to their peers (Reardon, Valentino, Kalogrides, Shores, & Greenberg, 2013).

Virtual schools have an opportunity to serve more at-risk students, and St. Isidore of Seville Catholic Virtual School meets this challenge head-on by providing the flexibility of pacing and schedule to meet their needs. The Changing Landscape of K-12 Education in the US states that virtual schooling is an effective tool for "providing at-risk students with additional remediation," as well as "verifying whether or not they are accessing those materials regularly and effectively." Using the SISCVS system, Oklahoma certified teachers will be able to do just that- deliver a remarkably individualized instruction customized to the student's needs in real time.

2. Lack of clarity regarding the proposed school's pedagogical approach. This can be found in Section 9 of the application.

Educational Plan:

Curriculum and Instructional Model

Instruction is delivered by the teacher via synchronous and asynchronous using teacher created lessons and utilizing the Archdiocese of Oklahoma City Standards and Benchmarks and research-based curriculum resources as guides in their creation. [Archdiocese of Oklahoma City Standards and Benchmarks](#). See below for additional information.

Teachers teach best when they have prepared their own materials with the appropriate expectations of desired rigor and classroom capability in mind. Teachers will utilize Canvas by Instructure which allows for courses to be designed in a variety of ways. Canvas provides for the upload of videos and pdfs, links to websites, and the importing of info from a variety of curriculum resources. Each teacher will utilize this platform. Assessments can be conducted in a variety of ways as well.

Grade Bands	Sample Daily Activities
Grades K-3	<p>Early Elementary K-3 Sample Activities:</p> <ul style="list-style-type: none">• Parent/guardian logs into the SISCVS learning system• SISCVS learning management page will contain lessons for the day and scheduled activities including those activities to be supported by the parent/guardian and teacher.• Teacher will provide a schedule of online live classes each day for direct instruction.• Parent/guardian and student read together the assignments and the daily schedule• Student and parent/guardian organize the materials for the day's lessons and begin typical early elementary activities in three to four subject areas of concentration involving perceptual-motor development, reading individually out loud, listening, reading together out loud, and basic numeracy skill development• Student and parent/guardian attend periodic synchronous sessions via the web classroom with the teacher of record• Student participates independently in technology supported learning games served up by the SISCVS System• Teacher verifies attendance (5.5 hours required daily)• Teacher and Parent/guardian review progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student

<p>Grades 4-5</p>	<p>Upper Elementary 4-5 Sample Activities:</p> <ul style="list-style-type: none"> • Parent/guardian and student log into SISCVS System • SISCVS System serves up lessons for the day and scheduled activities including those activities to be supported by the parent/guardian and teacher • Teacher will provide a schedule of online live classes each day for direct instruction. • Parent/guardian and student read together the assignments and the daily schedule • Student and Parent/guardian organize the materials for the day's lessons and begin typical upper elementary activities in four to five subject areas of concentration involving perceptual-motor development, reading individually out loud, listening, reading together out loud, and basic numeracy skill development in addition to science, language development, and foreign language study if assigned. • Student is introduced to age-appropriate novels and other readings and assigned readings from a reading list of relevant novels • Student interacts with technology supported learning activities designed to strengthen academic skills at a level determined by computer adaptive academic skill testing to be the appropriate level for the student. • Teacher verifies attendance (5.5 hours required daily) • Teacher and Parent/guardian review progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student
<p>Grades 6-8</p>	<p>Middle School 6-8 Sample Activities:</p> <ul style="list-style-type: none"> • Parent/guardian and student log into SISCVS System • SISCVS System serves up lessons for the day and scheduled activities including those activities to be supported by off-line activities and the organization of science experiments to be done in concert with the online science curriculum • Teacher will provide a schedule of online live classes each day for direct instruction. • Parent/guardian reviews the days lessons and activities with the student • Five subject areas are prepared for the day's learning activities • Student attends synchronous learning sessions present under the direction of the teacher • Student interacts with others online in the development of group projects and assignments that require peer collaboration to complete • Student interacts with technology supported learning activities designed to strengthen academic skills at a level determined by computer adaptive academic skill testing to be the appropriate level for the student

	<ul style="list-style-type: none"> • Student works independently on skill and knowledge attainment assignments • Student reviews expected outcomes for the day • Student takes quizzes and end of unit exams to measure skill mastery and attainment based on the lessons for the day • Student electronically submits all required written assignments to the teacher • Teacher verifies attendance (6.75 hours required daily) • Teacher, student and Parent/guardian review daily progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student • Parent/guardian logs into Parent/guardian SISCVS System account to review progress and request assistance if needed • Teacher meets virtually and by web conference tools with Parent/guardian and Student at least every 30 days to review monthly progress, complete required documentation, and provide academic counseling or referrals to appropriate agencies for services as needed
Grades 9-12	<p>High School 9-12 Sample Activities:</p> <ul style="list-style-type: none"> • Student logs into SISCVS System • SISCVS System serves up lessons for the day and scheduled activities including those activities to be supported by off-line activities and the organization of science experiments, readings, written assignments, and synchronous activities to be done in concert with the online curriculum • Teachers will provide a schedule of online live classes each day for direct instruction. • Student reviews the daily lessons and activities with the Parent/guardian • Students review expected outcomes for the day • Five subject areas are prepared for the day's learning activities • Student attends synchronous learning sessions present under the direction of the teacher • Student interacts with others online in the development of group projects and assignments that require peer collaboration to complete • Student interacts with technology supported learning activities designed to strengthen academic skills at a level determined by computer adaptive academic skill testing to be the appropriate level for the student • Student takes quizzes and end of unit exams to measure skill mastery and attainment based on the lessons for the day

	<ul style="list-style-type: none"> ▪ Student electronically submit all required written assignments to the teacher ▪ Teacher verifies attendance (6.75 hours required daily). teacher, Student and Parent/guardian review daily progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student ▪ Student may participate in interest clubs, student government, and intramural sports ▪ Student participates in community support activities ▪ Parent/guardian logs into Parent/guardian SISCVS System account to review progress and request assistance if needed ▪ Teacher meets virtually and by web conference tools with Parent/guardian and student at least every 30 days to review monthly progress, complete required documentation, and provide academic counseling or referrals to appropriate agencies for services as needed <p>Some students receive and execute assignments early in the morning on the same rhythm of a traditional school, but many more find their productivity is best in the afternoon or evenings. At the St. Isidore of Seville Catholic Virtual School, students meet according to schedule, but asynchronously learn at the times convenient to their schedules while ensuring the daily minimum of instructional hours. A weekly schedule follows what is presented in a daily schedule and is consistent over time. The Scope and Sequence of the curriculum drives what and when standards are being taught throughout the academic year.</p>
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Learning environment

St. Isidore of Seville Catholic Virtual School will provide live instruction within the SISCVS system and accessed via the students' course dashboard. This synchronous instructional tool is used for one-on-one sessions between teacher and students as well as for collaboration among students. A teacher's virtual office houses a whiteboard, chat room, and webcams to promote collaboration. Additionally, share screen features are controlled by the teacher, and shared documents can be edited simultaneously. Within these meetings, teachers can create "breakout" rooms where collaborative groups can meet to discuss a project or work on content. Guidance for families on establishing conducive work and learning spaces at home will be shared by the classroom teacher.

Teachers will also utilize asynchronous sessions. This is to allow for differentiation to take place for reading, math groups, project coaching, writing feedback sessions, and one-on-one help.

Curriculum overview

St. Isidore of Seville Catholic Virtual School will utilize the standards and benchmarks of the Archdiocese of Oklahoma City [Archdiocesan Curriculum Standards and Benchmarks](#) which are a compilation and adaptations of NCTE English and Language Arts Standards, NCTM Math Standards, Next Generation Science Standards, C3 Framework, Common Core, and Oklahoma State Standards, and various diocesan standards from across the country. The school's standards and benchmark curriculum and instructional framework is guided by national best practice and is reviewed and updated every seven years.

- Curriculum resources utilized to meet the standards and benchmarks must be research based, innovative, and rigorous.
- The course of study includes core subjects in Religion, Math, Science, Reading/Literature, English, History/Social Studies, fine arts, world languages, special interest electives and career-focused electives.
- The curriculum design methodology uses principles of Universal Design for Learning, ensuring that both the curriculum and the instructors provide multiple opportunities for engagement, representation, as well as action and expression to ensure that students will spiral with the same topics throughout their career, each time increasing the complexity in order to reinforce previous learning, and also to reteach concepts one-on-one and in small groups to ensure mastery.
- School Graduation Credits will be tracked utilizing FACTS SIS and within the Counseling Department utilizing OSDE forms. [Graduation Requirement Form, OSDE, 2026](#)
- Lab Science for Middle School and High School will be conducted with partnership with local universities or by utilizing a wider net of resources. ([Making Science Labs Available Virtually](#) © 2023 Center for Teaching and Learning | Wiley Education Services)
- Course of Study for High School Students meet the Oklahoma graduation requirements and are enhanced by AP and concurrent class options for college credit. Certificate programs through Google, Meta, and Coursera will also be offered to enhance the education of a student wishing to utilize the skills in post secondary education or the workforce.

Instructional Delivery and Resources

Instruction will be driven by teacher created lessons based on materials from research-based curriculum providers. Teachers may enhance or supplement their lessons from a variety of sources. Some of the proposed vendors are listed below, this list is expected to grow as research continues to be done in preparation of a virtual program:

K-5

Teacher Created
Lessons
Uploaded into
Canvas
Research Based
Curriculum
Resources and
Textbooks
Supplemental
Resources
Educational Apps
Direct Instruction
synchronously
Small Group
Instruction
Asynchronous
Instruction

6-8

Teacher Created
Lessons Uploaded
into Canvas
Research Based
Curriculum
Resources and
Textbooks
Supplemental
Resources
Educational Apps
Direct Instruction
synchronously
Small Group
Instruction
Asynchronous
Instruction
CTE Courses
within subject area
Summer Credit
Recovery

9-12

Teacher Created
Lessons
Uploaded into
Canvas
Research Based
Curriculum
Resources and
Textbooks
Advanced
Placement Course
Concurrent
Courses
Certificate
Programs
Supplemental
Resources
Educational Apps
Direct Instruction
synchronously
Small Group
Instruction
Asynchronous

Curriculum Resources

To address the wide range of learners at St. Isidore of Seville Catholic Virtual School, a variety of standards-aligned additional resources are utilized by teachers:

- Researched Based Curriculum/ Textbook Publishers: Saavas, HMH, McGraw Hill, Prentice Hall, Memoria Press, Sadlier, Zaner Bloser, and others
- High Quality Literature, Poetry, and Nonfiction Selections
- iReady - an assessment and instruction program for Math and English Language Arts that provides a diagnostic, aligned instruction, and teacher resources to help accelerate students toward grade level proficiency and beyond
- BrainPop – an online animated curriculum-based content that is aligned to state standards. It includes videos, games, quizzes, and activities for science, health, writing, reading, social studies, and math.
- DIBELS – provides a battery of short (one minute) fluency measures that can be used for universal screening, benchmark assessment, and progress monitoring in kindergarten – 3rd grade.
- IXL – an interactive online learning solution aligned to state standards that helps teachers personalize instruction through comprehensive curriculum, continuous diagnostics, and guidance for skill building.
- NewsELA – an instructional content platform that provides teachers and students with access to 20+ genres of content to support core instruction, like primary sources, reference texts, essays, fiction, issue overviews, and more at 5 reading levels.
- Reading A-Z – an instructional content platform that provides thousands of downloadable, projectable, printable teacher materials, covering all the skills necessary for effective reading instruction.
- IEW-Institute for Excellence in Writing. Using the four language arts—listening, speaking, reading, and writing—IEW methods have been proven to be effective for students of all ages and levels of ability, including those who are gifted, have special needs, or are English language learners.
- Delta Science, Carolina, University provided lab lessons
- Babbel, Rosetta Stone- World Language programs in addition to teacher guided lessons

All the selected vendors have data available to support the effectiveness of their offerings, and the school's choice of the vendors is based on extensive evaluative information reviewed by The Archdiocese of Oklahoma Director of Education and the Superintendent of Schools for the Diocese of Tulsa in proposing the education program to be offered to the St. Isidore of Seville Catholic Virtual School Board. Each vendor aligns with the instructional methodology of the school by embedding the pedagogy of personalized learning and backward design principles in all courses. These methods are research-based and imperative for the leaders of tomorrow. Small group and individual instruction when warranted builds strong learners.

Instructional Strategies

Teacher-created direct instruction puts students' needs at the forefront of the instructional design, allowing for them to be wholly involved in each aspect of their learning. Instruction will be synchronous and asynchronous in order to meet the needs of all students. Students can progress through the independent aspects of their lessons at different paces based on their rate of mastery, yet the school has grading and progress expectations that all students must meet for each term. In the virtual setting, the benefit rests within the flexibility and fluidity for each student's schedule. The daily experience of a St. Isidore of Seville Catholic Virtual School student includes scheduled live instructional sessions, scheduled small group targeted sessions, participation in Socratic discussions to improve a respect for dialogue and the improvement of oral language and critical thinking skills, and 24/7 access to asynchronous course work and supplemental curriculum resources, aligned to Archdiocesan standards that meet or exceed state standards. This student-centered learning approach allows for more active learning, increased comprehension, and responsibility which fosters independence, accountability, and time-management - all critical skills for higher education, the job force of today, and everyday life. Students will also have personalized learning opportunities to help them develop their own learning strategies and be engaged in the learning process by having a voice in the process.

An important addition to individualizing instruction according to student needs is that as students' progress through the digital curriculum asynchronously, the Learning Management System within SISVCS captures the results of short cycle assessments in a color-coded mastery dashboard against state standards, equipping teachers with the immediate data needed to provide targeted synchronous instruction. The St. Isidore of Seville Catholic Virtual School instructional model plans synchronous instruction as a chance to add instructional value above and beyond what is already available in the asynchronous model. Teachers use data to determine which students need one-on-one direct instruction or small learning groups in order to both differentiate and tailor instruction to students' real-time needs. This is especially effective in remediation situations. In order to support student engagement, peer interactions will be hosted within small and large virtual classroom settings, to ensure individual attention, increased participation, and better communication.

Lastly, instruction is embedded within a Multi-Tiered System of Supports (MTSS/RtII). MTSS/RtII uses assessment, intervention, and targeted instruction to ensure the academic, social, and emotional growth of each child within three tiers - whole group, small group interventions, and individualized support.

Career Readiness and Workforce Development Program:

Oklahoma and the nation face a critical shortage of qualified employees with the skills and training needed to fill available jobs. In February 2021, ACTE reported that 55% of jobs in Oklahoma require skills training – more education than high school but less than a four-year degree; however, only 47% of Oklahoma workers are trained at this level. St. Isidore of Seville Catholic Virtual School career readiness program aims to help to fill these gaps. One way will be by allowing students to participate in professional online certificate programs

that build real life skills that transfer to work opportunities after graduation. These skills can help a student to continue their education while working at the same time.

St. Isidore of Seville Catholic Virtual School will offer a comprehensive career readiness program that is an integrated and inclusive approach to student learning that is designed to close the skills, interest, and equity gaps in this evolving, global society. Our process will parallel the vision and goal of the Oklahoma Department of Education's Individual Career Academic Plan (ICAP) and House Bill 2155.

In order to achieve this goal, a Career Tech Education (CTE) Coordinator will be hired to formulate and administer a comprehensive CTE program across grades K-12. This includes working collaboratively with families, school leadership, student services personnel, and teachers to ensure the delivery of career development services for all students.

The CTE coordinator and school counselor will work together to develop and strengthen student's postsecondary goals; however, their roles are differentiated through the support and services provided. The school counselor provides all students with counseling that facilitates academic, career and social/emotional development, helping all students develop plans for choosing a career. The school counselor will coordinate with the CTE coordinator to advocate for career readiness opportunities, which are designed to guide students to success in their chosen careers.

The specific CTE programs of study established will be informed by input from the industry needs of the community, as well as the career interests and the location of students in the program.

The CTE coordinator will build partnerships with local industries, postsecondary institutions, and community and student organizations to foster college and career readiness. Partnering with several of the 29 career tech centers around the state, as well as Jobs for America's Graduates, will increase the total Career Tech enrollments and workforce pipeline for the state of Oklahoma.

Students will have opportunities to work together in real time using digital collaboration tools that are intentionally integrated into the curriculum in order to support both cognitive and non-cognitive skills. St. Isidore of Seville Catholic Virtual School will specialize in the simulation of and/or real world, authentic learning experiences to help students develop key competencies that will allow them to thrive in the workforce. Students will have the opportunity to graduate with workplace experiences, industry recognized credentials and certificates, and/or college credits.

Equipment and Technology Requirements

St. Isidore of Seville Catholic Virtual School will ensure that all students have access to broadband internet to participate in the school program. This may include providing a limited number of Wi-Fi Hotspots to students that live in rural areas with no broadband providers.

All students will be provided with:

- ✓ Hardware
 - Chromebooks
 - Earbuds
 - Cellular Hot Spots (upon request/financial need/approval according to school policy)
- ✓ Software
 - Chrome OS
 - GoGuardian

All school staff will be provided with:

- ✓ Hardware
 - Windows Laptop
 - External Monitor (upon request/approval)
 - Keyboard (upon request/approval)
 - Mouse (upon request/approval)
 - Headset (upon request/approval)
- ✓ Software
 - Microsoft 365 Suite
 - One Drive storage space
 - Business Intelligence (BI) Tools (One or more of the following)
 - Domo
 - PowerBI
 - High Speed Internet Connectivity (School Office Only)
 - Cisco Meraki Hardware (School Office Only)
 - Switches
 - Wireless Access Points
 - Content Filtering
 - Ring Central Telephones (School Office Only)

Students and staff are provided with:

- ✓ Software
- ✓ Google G-Suite
- ✓ Kami
- ✓ Learning Management System (LMS)
 - Instructure Canvas
- ✓ Student Information Systems (SIS) – FACTS SIS
- ✓ Web Conferencing (One or more of the following)
 - Big Blue Button
 - Zoom
- ✓ Communications – FACTS SIS
- ✓ Curriculum Resources/ Enhancement (One or more of the following)
 - Accelerate Education
 - eDynamic Learning
 - StrongMind
 - IXL Learning

- Raz Kids
- Moby Max
- Pear Deck
- Newsela
- Gizmos
- Overdrive
- Voyager Sopris (Dibels)
- n2y Unique
- Amplify
- Core Knowledge Foundation

- Brain Pop
- Pearson
- Memoria Press
- Tan Books
- HMH, McGraw Hill,
- Saavas
- Shurley English
- Zaner Bloser
- Sadlier
- Math in Focus

✓ Assessments (One or more of the following)

- Instructure Mastery Connect
- NWEA MAP
- iReady

Assessment Platforms:

- Google
- Edulastic (Go Guardian product for secure testing)

Alignment with Archdiocesan Standards and Benchmarks

As previously stated, the SISCVS system includes state-of-the-art technology with state-specific reporting components, and full curriculum alignment to meet or exceed state standards. Curriculum vendor coursework is embedded seamlessly within the SISCVS system. The St. Isidore of Seville Catholic Virtual School curriculum team first verifies alignment to the state standards, cross referencing with other vendors to ensure effective coverage. When the verification of alignment is completed, any gaps are identified immediately, and the St. Isidore of Seville Catholic Virtual School team procures supplementary materials to support mastery of each standard.

Student Assessment (Internal and External)

Plan to measure and report student progress

A strong assessment plan is the cornerstone of any successful instructional program. Each diocesan school implements numerous assessment tools for students and would propose the following for St. Isidore of Seville Catholic Virtual School. In order to verify curricular alignment to mission, standards and benchmarks, ensure instructional efficacy, and monitor student learning, schools must employ a balanced assessment system that includes several types of testing methods to determine what students are learning, how teachers are teaching, and what instructional and curricular decisions must be made with regard to scaffolding, alignment, adjustments, and interventions. In a balanced assessment program, school leaders plan for diagnostic, formative, interim and summative assessments. In this way, assessment results provide identification of students in need of intervention, feedback

to teachers about instructional practice, and verification of curricular strengths and weaknesses.

St. Isidore of Seville Catholic Virtual School Assessment System

- **Incoming Assessment** – All new students will be assessed for learning readiness using Curriculum Based Measure, a computer adaptive, or a nationally normed test. The results from this initial assessment will assist teachers in developing a personalized plan for each student using Archdiocese of Oklahoma City Standards and Benchmarks and Oklahoma State standards.

Ongoing Assessments – Once a student is enrolled and has finalized his/her personalized plan with an advisor, the student will participate in a variety of performance assessments over time to monitor their progress and modify their academic program keeping them on track for academic success. These assessments include:

- Short Cycle Assessments
- Course level Assessments
- Computer-adaptive Nationally Normed Assessments: The assessments are taken three times per school year by all students. Baselines (incoming assessment) are established the first month of the school year. Once a baseline has been established, performance is also measured in the winter and spring.
- **State tests:** Summative assessments to measure student achievement in learning the standards, if required.
- Local Benchmark/Diagnostic (Computer Adaptive Nationally Normed)- **iReady, NWEA MAP**
- Incoming Assessment- **iReady, NWEA MAP, WRAT**
- Short Cycle Assessments- **iReady (K-8) and MasteryConnect (K-12)**
- Reading Fluency- **DIBELS, STAR Early Learning Literacy (K-2, Reading A-Z)**
- Classroom Assessments- **iReady Standards Mastery, MasteryConnect, Course assessments**
- **Benchmarks for student learning**
 - Local Benchmark/Diagnostic (Computer Adaptive Nationally Normed)- **iReady**
 - Incoming Assessment- **iReady, NWEA MAP, WRAT**
 - Short Cycle Assessments- **iReady (K-8) and MasteryConnect (K-12)**
 - Reading Fluency- **DIBELS, STAR Early Learning Literacy (K-2, Reading A-Z)**
 - Classroom Assessments- **iReady Standards Mastery, MasteryConnect, Course assessments**
- **District/school assessments**
 - The specific school assessments are contained in the assessment plan above.
- **Oklahoma School Testing Program (OSTP), if required**
 - State Assessments-

- Oklahoma Core Curriculum Test for Grades 3-8 and 11 in Mathematics, English Language Arts and Science.
- Oklahoma Core Curriculum Test for U.S. History administered in Grade 11.

Program Evaluation

Student performance and progress towards standards mastery will be continually monitored at the school level through a defined cycle of data review and data meetings. Each year the Principal will work with teachers and the assessment team to create the Instruction Plan based on the school's data. This plan will be created once the school Assessment Plan has been finalized and will take into consideration the points at which data will be available from each assessment. The Instruction Plan will detail what groups teachers and school leaders will meet to discuss data, and how often. The plan will define a school-wide data protocol to be utilized to guide review of the data, interpretation of the data, and determination of follow up actions. Specific data to be reviewed in a timely fashion as dictated by the assessment calendar. September reviews are focused on diagnostic data, short cycle data would be reviewed during the 2nd and 3rd testing periods to determine growth and intervention needs.

During these conversations data will be reviewed through multiple lenses:

- Proficiency and growth data
- Individual student level data
- Grade level or grade band data trends
- Subject area trends
- Data by teacher
- Data disaggregated by student subgroup
- Item level analysis
- Standards level analysis

Minutes, team notes and action plans, and needed resources will be captured during each meeting, shared with the school faculty, and placed in a shared digital space for relevant stakeholders to access.

This plan monitors student performance on short cycle assessments and looks at supplemental curriculum usage to identify curriculum gaps/needs, areas of instructional need, and patterns of supplemental usage as it relates to student performance. Particular attention to teaching methods and resources are to be used.

As stated previously, the St. Isidore of Seville Catholic Virtual School Board is committed to academic excellence and will have an unwavering commitment to achieving the school academic goals. Each year, St. Isidore of Seville Catholic Virtual School Board in collaboration with the administrative team will create a school improvement plan based on the annual data analysis of state assessments, review of the year's benchmark assessments, and feedback from the School Improvement Team. The Continuous Improvement Plan (CIP) will contain the required components as defined by §70-5- 117.4., including strategies for

improving instruction. In a virtual school, that often includes discussions on the content of synchronous instructional sessions, strategies to improve student engagement, and the use of supplemental curriculum to support student learning gaps. The Board of Directors will approve the CIP and will review progress towards the academic goals at its monthly board meetings.

Schools in the Archdiocese of Oklahoma City and the Diocese of Tulsa are accredited by OCCSAA, Oklahoma Conference of Catholic Schools Accrediting Association, which is overseen by OPSAC. Certificate of Accreditation is currently up to date and renews in 2026 upon review. The curriculum offered also meets the standards of both the Archdiocese of Oklahoma City, the Diocese of Tulsa, national standards, and Oklahoma standards. St. Isidore of Seville Catholic Virtual School Board will obtain accreditation through the state of Oklahoma for the required period of time and with a national accrediting agency after year two if needed.

Plan for support structures (e.g. online tutoring, home mentors, and technical support services in place 24x7) in addition to teacher support

Teacher-led and teacher created instruction will include synchronous and asynchronous learning opportunities, one-to-one tutoring, organized peer interaction, and a focus on critical skills for success in college and the workforce.

All parents/guardians have access to an initial orientation program so they are prepared to support their student's learning. There are also ongoing parent/guardian support sessions provided in addition to the one-on-one conversations with their student's teacher(s).

Summer School and Tutoring Program: St. Isidore of Seville Catholic Virtual School Board has budgeted for a supplemental tutoring program for those students who need extra support. The focus will be on English Language Arts and Mathematics initially but may expand to other subjects. Summer School is optional and budget dependent.

Technical support services will be managed by staff technology support. This will include troubleshooting for hardware, internet, and program problems that may be experienced at home by the student and guardian.

3. **Concerns with proposed governance and school management structure, specifically the lack of clarity and consistency regarding board membership, duties, responsibilities, and residency and the potential conflict of interest and lack of proper control between the two entities. This section can be found in section 7 of the application.**

Board of Directors. All of the initial directors, including Brett Farley, are listed on page 3 of the Certificate of Incorporation, which was filed with Oklahoma's Office of Secretary of State on January 27, 2023.

Voting Rights and Governance. Non-profit corporations can be set up to be governed solely by a self-perpetuating board or by members who delegate most powers to a self-perpetuating board. St. Isidore is a member non-profit with the Archbishop of Oklahoma City and the Bishop of Tulsa constituting the two members. Neither bishop serves as a member of the Board of Directors. The Board of Directors is tasked with managing and directing "the business and affairs of the School," Bylaws, Article IV, Section 4.1, subject to the reserve powers of the members. Ibid. at Section 3.2.

Conflicting Terms. The Application has been amended to replace the phrase "Board of Trustees" with "Board of Directors" to make the Application consistent with the Bylaws and Certificate of Incorporation.

Bishops, the Board, and the EMO. To clarify, a) the bishops are not Members of the Board of Directors of St. Isidore, and b) the EMO that the School will contract with is a non-profit. See 2022 Official Catholic Directory, page 815 listing the Archdiocese's Office of Catholic Education. (attached). The Catholic Church, under the auspices of the United States Conference of Catholic Bishops, receives a group tax exempt ruling from the IRS stating that all organizations listed in the Official Catholic Directory are non-profit tax exempt organizations. See IRS Determination Letter dated August 24, 2022 (attached).

- Concerns regarding connectivity, access, and technology support for students, particularly for rural Oklahoma and including the lack of a cited and appropriate budget for such services. This can also be found in Section 7 of the application.

Description of Technology Capacity

All students will receive a loaned laptop computer (Chromebook Go) at no additional cost. This device will have internet access via one of the three major cellular providers, T-Mobile, AT &T, and Verizon due to rural areas not having adequate internet access. Utilizing cell towers is the best way to access the internet if cable or fiber has not yet been installed. Cellmapper.net is an app that assists in determining which cellular companies are utilizing which towers that are currently available in Oklahoma.

The following images illustrate clearly the information that was recently obtained from the Cellmapper.net website. The state of Oklahoma is outlined in gray. As it clearly indicates, T-Mobile has the best 4G and 5G coverage in the state.

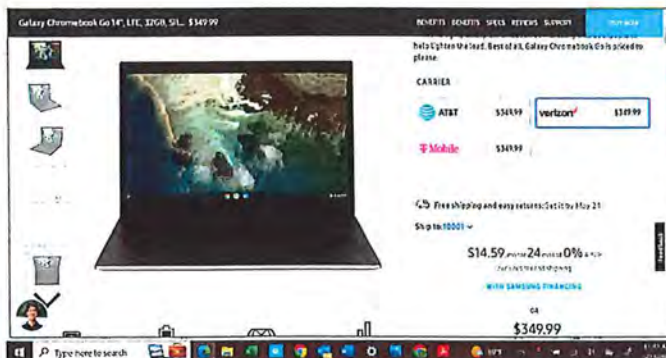
Chromebooks now are available with data plans that can be linked to a cellular data plan. They are very reasonable in cost, ranging from \$4.37- \$9.92. T-Mobile's price is \$7.50/month per device and is included in the price of the device with a two-year contract. AT&T and Verizon both have similar plans. St. Isidore of Seville Catholic Virtual School will determine the address of the student and use the plan that will best meet their needs. Additional hotspots can also be issued if needed. 100 hotspots are included in the budget.



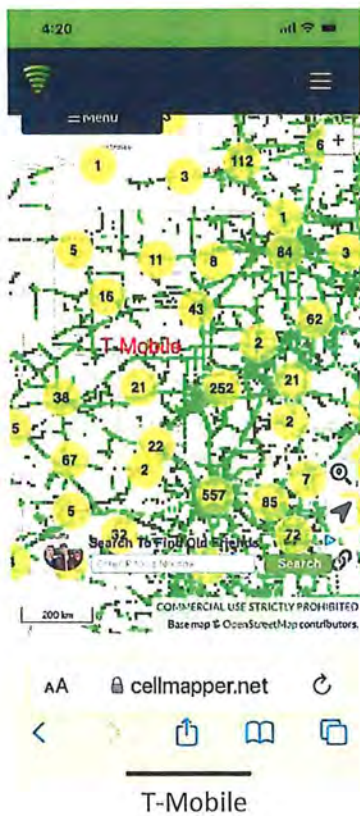
[Samsung Galaxy Chromebook Go | 1 color in 32GB | T-Mobile](#)

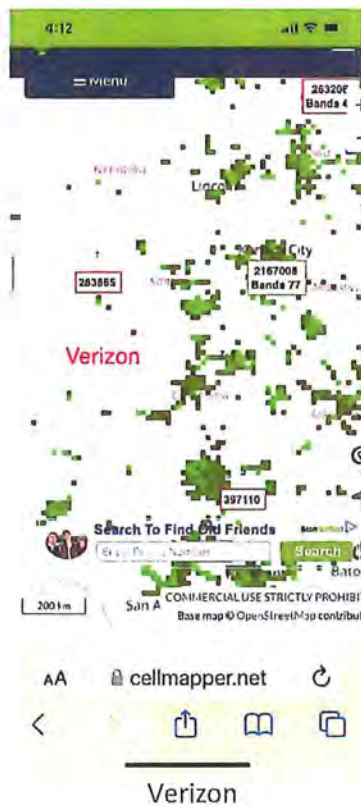


[Samsung Galaxy Chromebook Go – Specs, Pricing & Reviews | AT&T \(att.com\)](#)



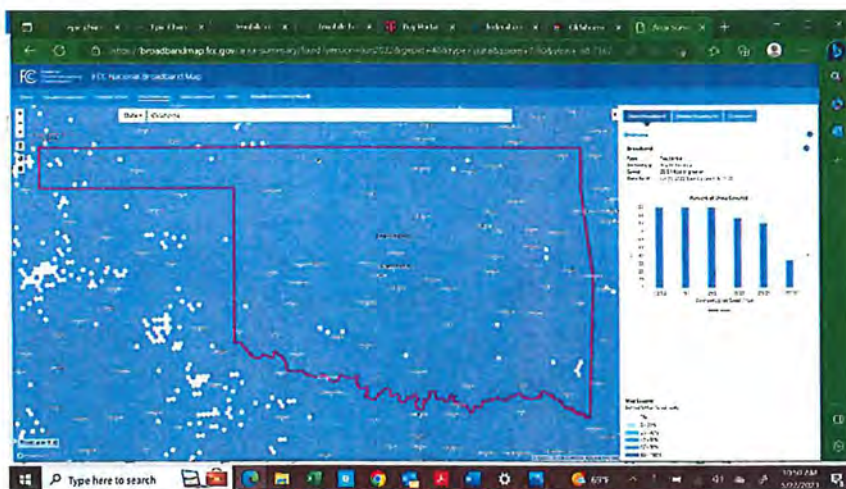
[Galaxy Chromebook Go 14", LTE, 32GB, Silver \(Verizon\) Chromebooks - XE345XDA-LA1VZ | Samsung US](#)





Student technological fees will be applied to the technology needs of the school. Supplied equipment will be configured, imaged, and have required software needed to assure that students are able to fully participate in the educational program in a safe and productive way.

Students and families must have regular, reliable access to the internet for successful participation in the school. As of December 2020, the Federal Communications Commission estimated that approximately 100% of Oklahoma residences had broadband Internet or 80-100% had mobile internet access of 25 Mbps or greater with at least a choice of two providers. [Federal Communications Commission, 2023](#)



Area Summary - Fixed | FCC National Broadband Map



Area Summary - Mobile | FCC National Broadband Map

While not required, it is helpful if the parent/guardian of the student has a device separate from the student computer to check email and to check parent accessible reports and information within the SISCVS platform. This device could be a smartphone, an iPad, a Chromebook, laptop, etc. If the parent/guardian does not have his/her own device, the school-issued Chromebook can be used by the parent/guardian to check email and SISCVS when the student is not engaged in schoolwork. Acceptable use guidelines apply to all who use the equipment and access the platform.

St. Isidore of Seville Catholic Virtual School Administration will contract with and secure competent IT Support and Services including acquisition of appropriate technical devices, programs, and infrastructure support systems. They will seek and secure competitive pricing and centralized purchase discounts for computers, monitors, printers, software and other peripherals ("Computer Equipment") for St. Isidore of Seville Catholic Virtual School. Related services include:

- Provide loaned student laptop computers with internet access(Chromebooks).
- Provide repair and replacement of student computers.
- Carry out imaging or reimaging of student computers.
- Carry out reclamation of student computers.

System Availability and Reliability

The SISCVS system is available to students 7 days a week/24 hours per day during the school year. The SISCVS platform consists of Canvas by Instructure, a platform with a promised 99.9% uptime combined with curriculum delivered through the Learning Management (LMS) platform. The SISCVS platform has experienced 0.06% downtime in total for an uptime of 99.94%. Canvas by Instructure is a multi-tier, service-oriented architecture managed as a SaaS platform by the commercial vendor in a fault tolerant Amazon Web Service infrastructure, ensuring maximum security and founded on the guidance provided by International Organization for Standardization's (ISO) 27000, NIST's CyberSecurity Framework, AICPA's Trust Services Principles and Criteria, and SANS' CIS Critical Security Controls.

System Backup

All student data and documents are stored in a cloud-based software as a service through both Google and Canvas. All systems are redundant and FERPA compliant. All work product data is stored in the cloud and backed up on a regular basis. Systems and tools leveraged by the products secured for this purpose include:

- Microsoft
- O365 Backup as a Service
- Axcient's X360 Cloud platform
- Monthly system administration
- Daily verification of backup summary
- Weekly backup audits
- Alerting and notification to failed backups
- Data recovery, per requests
- Google
- Backupify

In addition to backup systems, other security protocols are leveraged such as:

- Microsoft Advanced Threat Protection
- Microsoft Intune to preserve hardware/software configuration standards (Windows Laptops)
- Google G-Suite policy lockdown to preserve hardware/software configuration standards

- (Chromebooks)
- GoGuardian for activity tracking and content filtering (Chromebooks)
- Sophos Anti-Virus
- Multi-Factor Authentication (MFA) to secure all Microsoft account access

Description of system accessibility

The Canvas LMS platform was built using the most modern HTML and CSS technologies, and strives for WCAG 2.1 Level A/AA and Section 508 of the Rehabilitation Act conformance. The latest Canvas LMS Accessibility Conformance Report is [available at this link](#).

Budget Adjustments- See budget documents in Section 13: Appendix H

Additional Detail on Computer Fee Calculation						
Enrollments	500	500	1000	1250	1500	
Fee Per Computer, Chromebook Go includes data plan with T-Mobile, AT&T, Verizon 2 year	425	425	425	425	425	
Gross Computer Fees	212500	0	0	0	0	
Churn Rate	15%	15%	15%	15%	15%	
Churn Count	75	75	150	187	225	
Churn Computer Fees	31875	31875	63750	79475	95625	
Retention Rate	75%	75%	75%	75%	75%	
Prior Year Retained Students	0	375	750	937	1125	
New Students	0	125	250	313	375	
New Student Computer Fees		\$3125	\$106,250	\$133,025	\$159,375	
Faculty Laptops with applications- Lenovo, with dock, monitor: 25"	\$0,000					
Total Device Cost	\$294,375	\$85,000.0	\$170,000	\$212,500	\$258,000	
Student Usage Device Management- Go Guardian, \$10.50/device	\$5,250	\$5,250.0	\$10,500	\$13,125	\$15,750	
100 Hot spots for additional internet access as needed \$8.50 mo or less- 25 for teachers/staff and 75 available for	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200	
Total Technology costs for Student Devices	\$309,825	\$100,450	\$190,700	\$235,825	\$283,950	

Start Up and 5 Yr. Budget specific to devices

General Educational Program									
Student Testing and Assessment	\$0	\$17,500	\$17,500	\$218,411	\$128,232	\$122,811			
School Extracurricular Activities	\$0	\$37,500	\$37,500	\$119,431	\$164,128	\$121,468			Academic field trips and graduation activities for
Student Screen Access Hardware	\$0	\$16,000	\$16,000	\$19,043	\$54,834	\$16,273			
Curriculum & Materials, ESE/VA System, and Instructional Support Services	\$0	\$478,000	\$478,000	\$1,300,000	\$2,000,000	\$9,210,000			See attached price list for costs
Student Technology Assistance Services	\$0	\$110,000	\$110,000	\$300,000	\$372,000	\$433,000			See attached price list for costs
Student Computers & Software	\$0	\$249,825	\$108,825	\$180,701	\$237,823	\$221,000			See attached price list for costs (Chromebooks replacement below)
Staff Training PD (Teachers)	\$0	\$4,344	\$13,344	\$29,349	\$28,333	\$17,841			
Regular Instructional Program	\$0	\$1,278,471	\$1,878,000	\$4,871,000	\$3,980,000	\$4,087,237			
Special Educational Program	\$0	\$27,000	\$27,741	\$28,548	\$27,354	\$28,187			
2022 Management Software	\$0	\$2,510	\$2,561	\$2,827	\$2,892	\$2,740			

Start Up and 5 Yr. Budget, Inclusion in the budget document

Additional Detail on Computer Fee Calculation						
120						
121	Enrollments	375	375	750	937	1125
122	Fee Per Computer, Chromebook Go includes data plan with T-Mobile, AT&T, Verizon-2 year contracts	425	425	425	425	425
123	<i>Gross Computer Fees</i>	\$159,375	\$0	\$0	\$0	\$0
124	Churn Rate	15%	15%	15%	15%	15%
125	Churn Count	56	56	113	141	169
126	<i>Churn Computer Fees</i>	\$23,800	\$23,800	\$48,025	\$59,925	\$71,825
127	Retention Rate	75%	75%	75%	75%	75%
128	Prior Year Retained Students	0	375	750	937	1125
129	New Students	0	125	250	313	375
130	<i>New Student Computer Fees</i>	0	\$53,125.00	\$106,250	\$133,025	\$159,375
131	<i>Faculty Laptop Fees with</i>	\$50,000.00	0	\$0	\$0	\$0
132	<i>Total Computer Fees</i>	\$233,175	\$76,925.0	\$154,275	\$192,950	\$231,200
133	Student Usage Device Management-Go Guardian. \$10.50/device	\$3,938	\$3,938	\$7,875	\$9,849	\$11,813
134	100 Hot spots for additional internet access as needed \$8.50 mo or less	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200
135	Total Technology costs for Student Devices	\$247,313	\$91,063	\$172,350	\$212,999	\$253,213
136						
137						

Ready Accessibility: Investigate

Type here to search

Windows icons: Edge, File Explorer, Excel, Mail, Chrome, OneDrive

Start Up and 5 Yr. 75% Budget Specific to devices

	A	B	C	D	E	F	G	H	I
29		School Extracurricular Activities	\$0	\$10,000	\$10,000	\$10,335	\$104,120	\$19,137	Academic field trips and graduates activities for school activities
30		Student Internet Access Hardware	\$0	\$10,000	\$10,000	\$11,200	\$51,630	\$43,709	
31		Curriculum & Materials, SUSCE's System, and Instructional Support Services	\$0	\$487,500	\$487,500	\$415,000	\$2,600,000	\$1,830,000	See attached price list for costs
32		Student Technology Assistance Services	\$0	\$112,500	\$112,500	\$125,000	\$281,100	\$317,300	See attached price list for costs
33		Student Computers & Software	\$0	\$217,313	\$91,613	\$172,310	\$212,999	\$215,313	See attached price list for costs (Assumptions explained below")
34		Staff Training PD (Teachers)	\$0	\$6,314	\$6,314	\$30,369	\$28,125	\$35,841	
35		Regular Instructional Program	\$9	\$903,641	\$937,413	\$1,434,613	\$3,869,236	\$2,858,002	
36		Special Ed Instructional Program							
37		State Testing (Tests & Administration)	\$0	\$25,000	\$25,761	\$26,546	\$27,351	\$28,137	
38		IEP Management Software	\$0	\$2,500	\$2,565	\$2,627	\$2,692	\$2,760	
39		Alternative Curriculum	\$0	\$1,200	\$1,200	\$3,753	\$5,139	\$6,647	
40		Assistive Technology	\$0	\$28,279	\$28,279	\$15,692	\$105,402	\$133,763	
41		Start Up and 5 YR Budget	Start Up and 5 YR Budget- 75%	Start Up and YR 1 Budget					

The screenshot shows a Windows 10 desktop. At the top, a Windows Defender notification is visible, stating 'Your PC is protected' and 'Windows Defender is working'. Below the notification, the taskbar is visible, featuring the Start button, a search bar, and several pinned application icons including File Explorer, Microsoft Edge, and Google Chrome. The system tray on the right shows the date and time as 3:33 PM on 5/21/2021, along with weather information (73°F) and various system icons.

Start Up and 5 Yr. 75%- Inclusion in the budget document

	Extracurricular Activities	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$37,500
32	Student Planners	-	-	-	-	-	-	-	-	-	-	-	-	\$8
33	Student Internet Access Hardware	\$4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	\$50,004
34	Curriculum & Materials, SECTA System, and Instructional Support Services	-	-	\$2,500	\$2,500	\$2,500	-	-	\$2,500	-	\$2,500	-	\$2,500	\$49,500
35	Student Technology Assistance Services	\$4,375	\$3,75	\$3,75	\$3,75	\$3,75	\$3,75	\$3,75	\$3,75	\$3,75	\$3,75	\$3,75	\$3,75	\$45,000
36	Student Computers & Software	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$28,819	\$349,823
37	Staff Training / PD (Teachers)	\$629	\$79	\$79	\$79	\$79	\$79	\$79	\$79	\$79	\$79	\$79	\$79	\$4,348
38	Regular Instructional Program	\$30,019	\$30,019	\$71,913	\$71,913	\$80,287	\$30,019	\$30,019	\$71,913	\$27,348	\$90,283	\$27,348	\$412,812	\$1,378,877
39	Special Education Program	-	-	-	-	6,750	-	-	-	6,750	6,750	6,750	-	\$28,000
40	State Testing (Travel & Administration)	-	-	-	-	-	-	-	-	-	-	-	-	\$2,500
41	ITF Management Software	-	2,500	-	-	-	-	-	-	-	-	-	-	\$1,200
42	Alternative Curriculum	-	-	600	-	-	-	-	-	600	-	-	-	\$1,200

Start Up and 5 YR Budget | Start Up and 5 YR Budget - 75% | **Start Up and YR 1 Budget** | (+) | 4 |

Start Up and Yr. Budget by Month

5. **Concerns regarding the proposed school's funding structure, particularly as it relates to the potential commingling of private donations and public dollars. This can be found in Section 8 of the application.**

Donations to the School. Section 8.5 of the Bylaws provides: "The Board may accept on behalf of the School any contribution, gift, bequest, or devise for the general purposes or for any special purpose of the School. The School shall separately inventory assets purchased with private or donated funds." It is our understanding that Ms. Wilkinson suggested adding that the CFO of the School be designated as the recipient of such funds to ensure that there is no commingling of funds. The St. Isidore Board will amend the bylaws to say this, if necessary, but in our counsel's view this isn't necessary at the bylaw level but instead is a matter of operations and internal controls, which the School will have in place to ensure proper accounting.

6. **Concerns regarding projected overall student and school outcomes and deliverables over a five-year trajectory. This can also be found in Section 9 and 10 of the application.**

Student performance

Student performance will be tracked using the methods prescribed in the assessment plan, outlined in this application. In addition, the school will be held accountable to these internal student performance-based goals.

Performance Measure	Goal
Achievement	Aspirational: St. Isidore of Seville Catholic Virtual School will meet or exceed the statewide average for student proficiency in Math and ELA for elementary, middle, and high school grades. Each year, the school will strive for a 1-2% improvement from the prior year. Lowest: The first year of operation will provide baseline data for proficiency rates in Math and ELA. Each year, the school will strive for a 1-2% improvement from the prior year. By Year 4, student proficiency in Math and ELA will meet or exceed the statewide average.
Growth	Aspirational: St. Isidore of Seville Catholic Virtual School will earn a higher student progress score than the statewide average in all grade bands served by year 3. Lowest: By Year 5, St. Isidore of Seville Catholic Virtual School will meet the statewide average rating for Student Progress for all grade bands.

Re-enrollment	Aspirational: 65% of current students will re-enroll each year, based on a fall-to- fall roster. Lowest: 50% of current students will re-enroll, based on a fall-to-fall roster.
Attendance	Aspirational: St. Isidore of Seville Catholic Virtual School will meet or exceed an 65% attendance rate for each year of the charter. Lowest: St. Isidore of Seville Catholic Virtual School will meet the statewide average for student attendance rate across all grade levels.
Course Passing Rates	Aspirational: In the first year, St. Isidore of Seville Catholic Virtual School will have a course passing rate of 75% or higher for each grade band. Each year the school will strive for 2% improvement. Lowest: In the first year, St. Isidore of Seville Catholic Virtual School will have a course passing rate of 50% or higher for each grade band. Each year the school will strive for 2% improvement.

Include an outline of criteria designed to measure effectiveness of the school

In addition to the performance-based academic goals outlined above, the St. Isidore of Seville Catholic Virtual School will also measure itself against these mission specific and standards-based goals:

Performance Measure	Goal
Parent Satisfaction Ratings	Aspirational: St. Isidore of Seville Catholic Virtual School will earn an 75% or higher on the annual school satisfaction surveys as measured by parents/guardians from all grade levels saying the school meets or exceeds their overall expectations. Lowest: St. Isidore of Seville Catholic Virtual School will earn a 50% or higher on the annual school satisfaction surveys as measured by parents/guardians from all grade levels saying the school meets or exceeds their overall expectations.
College and Career Readiness	Aspirational: 50% of St. Isidore of Seville Catholic Virtual School will be accepted to one or more post-secondary options (2 or 4 year college, skilled trades or other vocational school, military service, and/or join the workforce)

	Based on students' post- graduation plans data. Lowest: 35% of St. Isidore of Seville Catholic Virtual School graduates will be accepted to one or more post- secondary options (2- or 4-year college, skilled trades or other vocational school, military service, and/or join the workforce) Based on students' postgraduation plans data.
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7. Legal issues that may be applicable to the consideration of the St. Isidore of Seville Catholic Virtual School Application for Initial Authorization as an Oklahoma charter school, including the legal basis for religious reason aligning to Oklahoma statute, the Oklahoma Constitution, and the United States Constitution for approval of the application. This can also be found in Section 5 of the application.

This item appears to request our view on whether state and federal law would allow the operation of a religious virtual charter school in Oklahoma. As described below, though Oklahoma's virtual charter law purports to prohibit the operation of a religious school, it is our position that such a prohibition violates both Oklahoma's Religious Freedom Act and the United States Constitution and therefore cannot be enforced. Stated differently, not only *may* a charter school in Oklahoma be religious but indeed it would be *unlawful to prohibit* the operation of such a school.

A. Oklahoma Charter School Act

As you know, Oklahoma's Charter School Act purports to ban religiously affiliated charter schools. The Act states that "[a] charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations," and it further provides that "[a] sponsor may not authorize a charter school or program that is affiliated with a nonpublic sectarian school or religious institution."¹ Thus, though the Act allows private secular entities to operate charter schools, it purports to prohibit charter schools from affiliating with any religious organization or integrating religion into their programs.

The pertinent question, however, is not whether Oklahoma's charter school statute purports to ban religious charter schools. The question is whether it would be lawful for the Board or the State of Oklahoma to actually enforce such a prohibition. The answer to that question is no.

B. Oklahoma Religious Freedom Act

First, it appears that the Charter School Act's prohibition on religious charter schools would violate Oklahoma's Religious Freedom Act.² That Act prohibits any Oklahoma governmental entity from "substantially burden[ing] a person's free exercise

¹ 70 Okla. Stat. § 3-136(A)(2).

² 51 Okla. Stat. § 251, et seq., *as amended by* Okla. S.B. No. 404 (May 2, 2023).

of religion,” even through a “rule of general applicability,” unless the government can show that doing so is “*essential* to further a compelling government interest” and is “the *least restrictive means* of furthering that compelling governmental interest.”³ As recently amended, the law makes clear that it is a substantial burden “to exclude any person or entity from participation in or receipt of governmental funds, benefits, programs, or exemptions based solely on the religious character or affiliation of the person or entity.”⁴

The Act would plainly apply to the exclusion of a religious school from Oklahoma’s Virtual Charter School program. For this reason alone, the Board and the State may not enforce the Charter School Act’s prohibition against such schools.

C. United States Constitution

Second, notwithstanding the Oklahoma Religious Freedom Act, any exclusion of religious schools from Oklahoma’s Virtual Charter School program would be unconstitutional.

Recent decisions of the United States Supreme Court make clear that States may not exclude religious schools from participating in public benefit programs that support K-12 education. Indeed, since 2017, the Court has invalidated *three* separate attempts by States to exclude religious schools from participating in such programs. First, in *Trinity Lutheran Church of Columbia, Inc. v. Comer*, the Supreme Court struck down a Missouri policy that barred religious entities from receiving grants to install playground improvements at schools and daycares, explaining that such a prohibition was a “clear infringement on free exercise” of religion, as protected by the First Amendment.⁵ Second, in *Espinoza v. Montana Department of Revenue*, the Supreme Court held that Montana “cannot disqualify some private schools solely because they are religious” from participating in Montana’s scholarship tax credit program.⁶ And third, in *Carson v. Makin*, the Supreme Court held that Maine could not prohibit schools that “promote[] a particular faith” or “present[] academic material through the lens of that faith” from the State’s high school tuition assistance program.⁷ The Court wrote that prohibiting these benefits from flowing to religious schools and religious families “is discrimination against religion” and, as such, “is odious to our Constitution and [can]not stand.”⁸

The command of the U.S. Supreme Court’s recent cases is that, although “[a] State need not subsidize private education[b,] once a State decides to do so, it cannot disqualify some private schools solely because they are religious.”⁹ The question

³ 51 Okla. Stat. § 253 (emphasis added).

⁴ Okla. S.B. No. 404, § 1 (May 2, 2023) (to be codified at 51 Okla. Stat. § 253(D)). This addition becomes effective November 1, 2023. *Id.* § 3.

⁵ 582 U.S. 449, 466 (2017).

⁶ 140 S. Ct. 2246, 2261 (2020).

⁷ 142 S. Ct. 1987, 2001 (2022) (quotation omitted).

⁸ *Id.* at 1996, 1998 (quotation omitted).

⁹ *Id.* at 2000 (quotation omitted).

whether Oklahoma may prohibit religious charter schools thus becomes whether those schools are—for purposes of federal constitutional law—“state actors” or are instead entitled to the same constitutional protections as other privately operated schools. Importantly, that question is *not* whether charter schools are nominally designated as “public” schools under Oklahoma law. Rather, the U.S. Supreme Court has explained that “state action may be found if, *though only if*, there is such a ‘close nexus between the State and the challenged action’ that seemingly private behavior ‘may be fairly treated as that of the State itself.’”¹⁰

Charter schools in Oklahoma are not “state actors” for this purpose, regardless how they might be labeled. Oklahoma charter schools are not operated in any meaningful way by the State but are subject only to broad oversight, with private—including even *for profit*—organizations given control over their day-to-day operations. Among other things, the State makes clear that charter schools are “not required to adhere to the Teacher and Leader Effectiveness standards set by the state of Oklahoma” and that the State’s primary method of control over any given school is its ability to terminate its charter—not to alter its curriculum or methods of operation.¹¹ In short, the State may choose to award or to end a contract with a charter school, but the State does not run it. Indeed, the very purpose of Oklahoma’s charter school program is to “[e]ncourage the use of different and innovative teaching methods,” “create different and innovative forms of measuring student learning,” and “[p]rovide additional academic choices for parents and students.”¹² Thus, Oklahoma, like many other states, has taken a “hands-off” approach to charter-school administration, exercising only broad oversight. Just last year, *ten states* filed a brief in the Supreme Court arguing that their own charter schools are not “state actors” for these very reasons.¹³

We understand that this is a divisive issue and one on which Oklahoma’s two most recent Attorneys General have taken opposing views. We refer the Board to former Attorney General John O’Connor’s opinion letter to this Board from December 2022 for a much more thorough discussion of these issues.¹⁴ Regardless of whether that letter was later rescinded on procedural grounds, we agree with its detailed analysis of this issue and its conclusion that Oklahoma charter schools are not “state actors.” And, for the reasons stated above and as well explained in Attorney General O’Connor’s opinion, because such schools are private actors, Oklahoma may not prohibit them from being religious.

¹⁰ *Brentwood Acad. v. Tenn. Secondary Sch. Athletic Ass’n*, 531 U.S. 288, 295 (2001) (quoting *Jackson v. Metro. Edison Co.*, 419 U.S. 345, 351 (1974)) (emphasis added).

¹¹ See *Oklahoma Charter Schools Program*, Oklahoma State Department of Education, <https://sde.ok.gov/faqs/oklahoma-charter-schools-program> (last visited May 16, 2023).

¹² 70 Okla. Stat. § 3-131(A).

¹³ See Brief for the States of Texas, Alabama, Alaska, Arkansas, Kansas, Mississippi, Nebraska, South Carolina, Tennessee, and Virginia as Amici Curiae in Support of Petitioner, *Charter Day Sch. v. Peltier*, No. 22-238 (U.S. Oct. 14, 2022).

¹⁴ See **Appendix A**.

D. Oklahoma's "Blaine Amendments"

Further, we are aware that the current Oklahoma Attorney General's Office has suggested that approving a religious charter school would violate provisions of the Oklahoma Constitution (so-called "Blaine amendments") which purport to require a "system of public schools . . . free from sectarian control" and to deny any "public money" from being "used, directly or indirectly, for the use, benefit, or support of any sect, church, denomination, or system of religion, or for the use, benefit, or support of any priest, preacher, minister, or other religious teacher or dignitary, or sectarian institution as such."¹⁵ First, as explained in Attorney General O'Connor's opinion letter, it is not clear that such provisions would even apply here.¹⁶ More importantly, even if these provisions *were* interpreted to apply to the State's charter school program, the State would be precluded by the United States Constitution from invoking them to prohibit religious charter schools.

Indeed, in two of the recent Supreme Court cases discussed above, the Court rejected attempts by States to do exactly what this question contemplates. Indeed, in *Trinity Lutheran*, the Missouri Department of Natural Resources had denied a religious daycare's application to participate in the playground resurfacing program specifically because the Department believed that giving such funding to a religious organization would violate a nearly identical provision of Missouri's Constitution, which prevented public money from being given to "any church, sect or denomination of religion."¹⁷ The Supreme Court, of course, held that invoking Missouri's Blaine amendment to exclude a religious organization from a public benefit "is odious to our [federal] Constitution . . . and cannot stand."¹⁸

Or consider *Espinoza v. Montana Department of Revenue*. Like Oklahoma and Missouri, Montana's Constitution contains a Blaine amendment, which bars public funds from being used to support any "sectarian purpose," including schools affiliated with "any church, sect, or denomination."¹⁹ In 2018, the Montana Supreme Court invalidated the state's private-school scholarship program because it ran afoul of this Blaine amendment by allowing State aid to help pay children's tuition at religious schools. The U.S. Supreme Court then took up the case and made clear that the federal Constitution does not tolerate such a result.

As discussed above, the Supreme Court explained in *Espinoza* that the First Amendment prohibits a state from creating a public benefit (*e.g.*, Oklahoma's charter school program) and then denying that benefit to recipients because of their religious character, even if the State's constitution purports to require such a result.²⁰ The

¹⁵ Okla. Const., Art. I § 5, Art. II § 5.

¹⁶ See **Appendix A** at 6–8.

¹⁷ See 582 U.S. at 455 (quoting Mo. Const., Art. I § 7).

¹⁸ *Id.* at 467.

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demands of the First Amendment to the U.S. Constitution are, of course, supreme over any contrary provision of state constitutional law. And thus, the Supreme Court held that Montana's Blaine amendment could not be used as a mechanism to discriminate against religious schools and strike down the scholarship program that would otherwise have been available to them.²¹ Nor, as discussed, can Oklahoma invoke its Blaine amendment to prohibit the State's charter school program from supporting schools that "promote[] a particular faith" or "present[] academic material through the lens of that faith."²² In either case, the state cannot deny such an opportunity "pursuant to a state law provision that expressly discriminates on the basis of religio[n]."²³

The Supreme Court's recent decisions effectively render Blaine amendments like Oklahoma's a dead letter. Indeed, the U.S. Supreme Court has "not hesitate[d] to disavow" these amendments' "shameful pedigree" of religious bigotry.²⁴ As the Court has observed, provisions like Oklahoma's were adopted as part of a nationwide movement "born of bigotry and . . . a time of pervasive hostility to the Catholic Church and to Catholics in general," that sought explicitly to stamp out the growth of Catholic schools around the United States.²⁵ These provisions were adopted as part of a wave of virulent anti-immigrant and anti-Catholic nativism, perhaps epitomized by the rise of the Know-Nothing Party, which was something of a precursor to the Ku Klux Klan.²⁶ Know-Nothings and other anti-Catholics spread fear that Catholics would subvert the "distinctively . . . Protestant" public schools of the time by "siphon[ing] off" public money to build a system of independent private schools "for dark Catholic purposes."²⁷

Thus was born the "Blaine amendment" movement, spurred by Rep. James Blaine's 1875 proposal to amend the federal Constitution to bar *every* State from using money raised for schools to be given to support "any religious sect."²⁸ At the time, "[i]t was an open secret" that "sect" and "sectarian" were "code for 'Catholic.'"²⁹ Blaine's amendment garnered significant support in Congress, passing the House and falling just short of passing the Senate. Despite the failure of Blaine's efforts at the federal level, "baby Blaine" amendments animated by the same prejudices swept across the country. Many States, including Oklahoma, were required to adopt a version of one as a

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²⁷ Kyle Duncan, *Secularism's Laws: State Blaine Amendments and Religious Persecution*, 72 *Fordham L. Rev.* 493, 502 (2003) (quotation omitted).

²⁸ Steven K. Green, *The Blaine Amendment Reconsidered*, 38 *Am. J. Legal Hist.* 38, 50 (1992) (quotation omitted); *see also Espinoza*, 140 S. Ct. at 2268 (Alito, J., concurring).

²⁹ *Espinoza*, 140 S. Ct. at 2259 (maj. op.); *accord Mitchell*, 530 U.S. at 828 (plurality op.).

condition of statehood.³⁰ Thirty-eight state constitutions, including Oklahoma's, still contain these Amendments; most, including Oklahoma's, contain the "bigoted code language" "sectarian."³¹ Both the Know-Nothing Party and the Klan were ardent supporters of these amendments.³²

The very point of Blaine amendments was to ensure that religious schools—and especially Catholic ones—would be treated with special disfavor in an effort to eradicate them. These provisions cannot be separated from these invidious and unconstitutional purposes—purposes that would be impermissibly furthered by any decision to enforce the amendments today.³³ This Board must refuse to do so.

E. Other Considerations

Finally, we address two other potential objections that have been suggested by the current Attorney General's Office.

First, in response to the Office's suggestion that our application "appears to violate the Civil Rights Act of 1964," we write to clarify and reiterate what is stated in the application: we are "committed to providing a school environment that is free from unlawful discrimination, harassment, and retaliation" and will comply with all applicable laws, consistent with the rights guaranteed to religious institutions under those laws, the Constitution, or other relevant legal authorities.³⁴ The application merely recognizes that religious schools are exempted from or entitled to accommodations under particular provisions of some laws. The fact of such exemptions does not "violate" those laws, and there is certainly no barrier to the Board approving a school that will operate consistently with its particular legal rights and obligations.

Second, in rescinding then-Attorney General O'Connor's letter to the Board, current Attorney General Gentner Drummond suggested that there might be some legal problem using state funding to support religious schools. The many Supreme Court cases discussed above show the opposite. Once again, the Court there made clear: "A State need not subsidize private education. But once a State decides to do so, it cannot disqualify some private schools solely because they are religious."³⁵

Nor is there any constitutionally relevant distinction between using state funds to support private religious schools through Oklahoma's charter-school program or

³⁰ Duncan, *supra*, at 514–15; *see also Blaine Amendment Bloodline Obvious in Oklahoma's Constitution*, The Oklahoman (Aug. 4, 2015), <https://www.oklahoman.com/story/opinion/editorials/2015/08/04/blaine-amendment-bloodline-obvious-in-oklahomas-constitution/60731592007> (describing "anti-Catholic heritage" and "stain of bigotry" of Oklahoma's Blaine amendment).

³¹ *Espinoza*, 140 S. Ct. at 2269–70 (Alito, J., concurring).

³² *See id.* at 2268, 2272.

³³ *See id.* at 2267–68.

³⁴ *See* Application at 79–80, 139.

³⁵ *Carson*, 142 S. Ct. at 2000 (quotation omitted).

through the grants, tax credits, and scholarship programs approved in these cases. In the first instance, the particular *method* of state funding and how it was distributed to religious schools was not the issue in those cases. The problem was the simple *fact* that the State had created a generally available benefit program from which religious schools had been excluded. Indeed, in *Trinity Lutheran*, the Court rejected Missouri's asserted interest in refusing to provide playground improvement funds "directly" to a religious school.³⁶ Moreover, even if the route and mechanism by which state funds are provided to schools somehow mattered, Oklahoma's program operates in the same indirect fashion as many other school-choice programs. Oklahoma's program funds virtual charter schools on a per-pupil basis; thus, virtual charter schools receive money through the private, independent choice of families, none of whom are compelled to send their children to a charter school.³⁷ Thus, even if there were some constitutionally relevant distinction between "directly" subsidizing private religious education and doing so "indirectly," that distinction is irrelevant here. Once again, Attorney General O'Connor's opinion addresses this issue in greater detail.³⁸

8. Consistency issues throughout the application, including needed corrections and readability across the different sections of the St. Isidore of Seville Catholic Virtual School Application for Initial Authorization.

Application body: Typos corrected.

Table of Contents. Cleaned up.

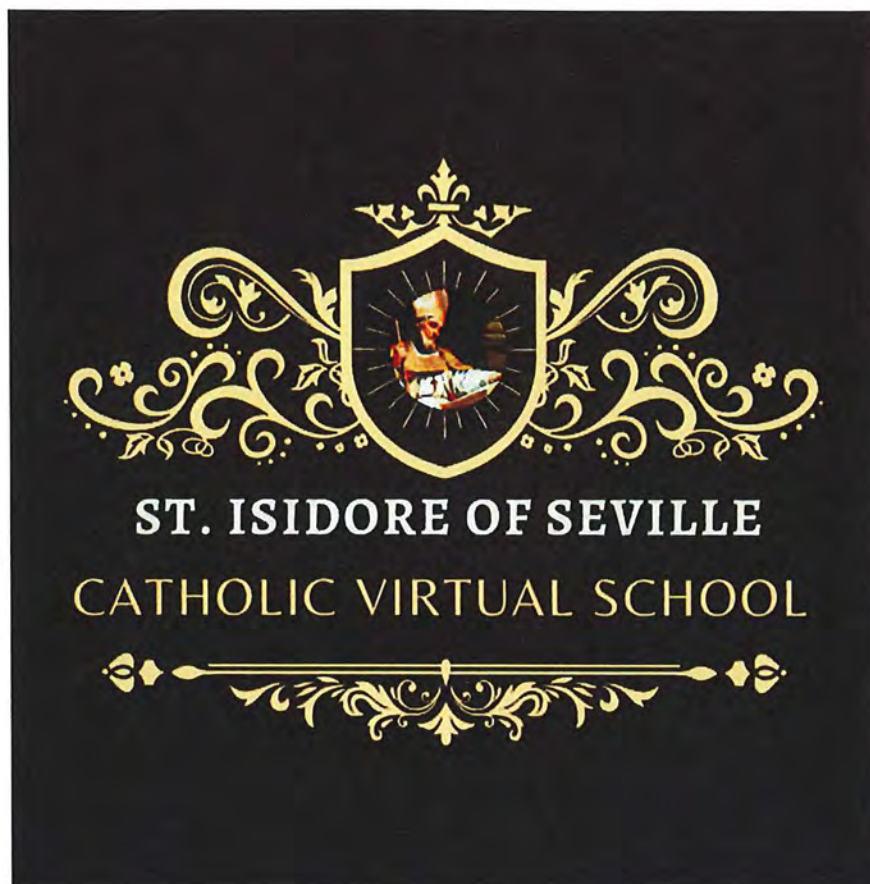
School Handbook. Minor typos corrected.

Appendix M and N Added for supporting documents for revision.

³⁶ See 137 S. Ct. at 463; *id.* at 472 (Sotomayor, J., dissenting) (arguing that the majority should not have allowed the government to "directly fund religious exercise").

³⁷ See Okla. Statewide Virtual Charter School Board, *Oklahoma Virtual Charter School Funding Study* 11–12 (June 2021), https://svcsb.ok.gov/sites/g/files/gmc806/f/documents/2021/okvirtualfundingstudy_final7.1.21_-_svcsb_website_version.pdf.

³⁸ See Appendix A at 7–8 (independent parental choice "break[s] the circuit between government and religion"); *id.* at 9–14 (finding no Establishment Clause barriers to religious charter schools and rejecting relevant distinctions with the programs in *Trinity Lutheran*, *Espinoza*, and *Carson*).



Virtual Charter Application
Section 1: Cover

Section 1. Cover Page

Name of applicant(s) and requested sponsor:

Applicant: St. Isidore of Seville Catholic Virtual School, Archdiocese of Oklahoma City

Sponsor: Oklahoma Statewide Virtual Charter School Board

Name of proposed charter school

St. Isidore of Seville Catholic Virtual School

Address of proposed charter school

Archdiocese Department of Education
7501 NW Expressway
Oklahoma City, OK 73132

Contact information: name, title, phone, email address

Mrs. Lara Schuler, Senior Director Department of Catholic Education

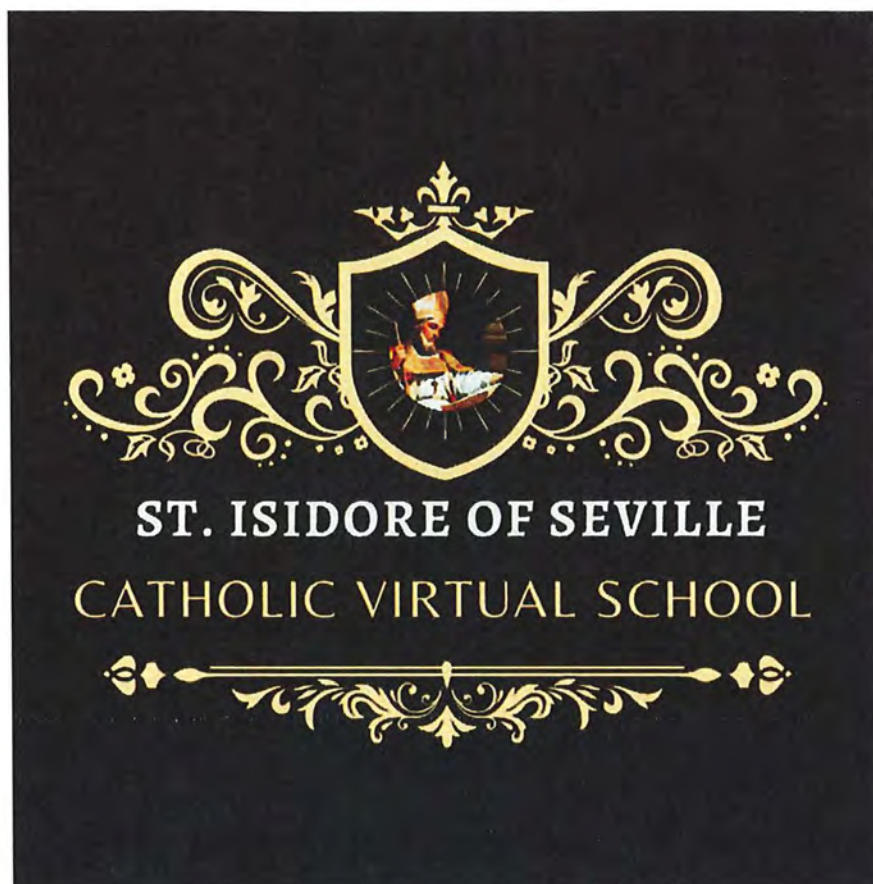
Ph: 405-709-2701

E: lschuler@archokc.org

Application submission date

1.30.2023- Original

05.25.2023- Revised



Section 2: Cover Letter

Section 2. Cover Letter

We find ourselves in a day and age that learning options are needed for a variety of reasons. Students need the ability to learn from anywhere to facilitate the work requirements of their parents, fulfill their achievement ability in a particular skill or talent, for medical reasons, or simply a desire to attend a quality school outside the boundaries assigned by the local school district.

The mission of St. Isidore of Seville Catholic Virtual School is to educate the entire child: soul, heart, intellect, and body of each child enrolled through a curriculum that will reach students at an individual level, with an interactive learning environment that is rooted in virtue, rigor and innovation. We are dedicated to academic excellence that empowers and prepares students for a world of opportunity and a lifetime of learning.

St. Isidore of Seville Catholic Virtual School envisions a learning experience that combines the best of online instruction with its capacity for individualized flexible learning. Our statewide Catholic virtual school, serving all K-12 grades, will feature an innovative and interactive curriculum, which meets or exceeds the Oklahoma Academic Standards, and taught by talented certified teachers. Teacher-led instruction will include synchronous and asynchronous learning opportunities, one-to-one tutoring, organized peer interaction, and a focus on critical skills for success in college or trade school, the workforce, and life.

St. Isidore of Seville Catholic Virtual School will seek partnerships with higher education institutions to permit students to participate in AP Courses, early enrollment, dual credit/concurrent enrollment and internships. Each student will have a grade level appropriate College/Career Plan and the school will support students in pursuing their post-secondary goals, whether that includes college enrollment, entering the workforce, military enlistment, or other pathways. At the K-8 level, the focus is on building skill and background in the key subjects of the curriculum to allow for advancement to the next level and to develop a strong moral character in the child that will serve them well in life. The key elements of the St. Isidore of Seville Catholic Virtual program are to ensure success at the next level. This is done in the following ways:

1. Integrated Curriculum- Teacher will integrate the humanities and teach across the curriculum in Literature, English, History/Soc. Studies, and Religion to create a cohesive understanding of the material to build background knowledge for future courses and paths of study. Teachers will utilize discovery-based approaches and integrate science with math, music, architecture, and religion.
2. Rigorous Academics with a wide array of course offerings that span the liberal art spectrum for all abilities. Course work will meet or exceed the Oklahoma and national standards. Students will use the current Archdiocese of Oklahoma Curriculum Standards and Benchmarks as well as strategies and methodologies that are suitable for virtual learning such as Socratic method for discussion; reading, interpreting, recitation and memory work literature and other genres for reading; writing for purpose and writing creatively, and project-based learning based on unit themes. Each year the Archdiocese of Oklahoma City and the Diocese of Tulsa review a subject area and make the necessary changes for best practice and to keep in alignment with state and national standards.

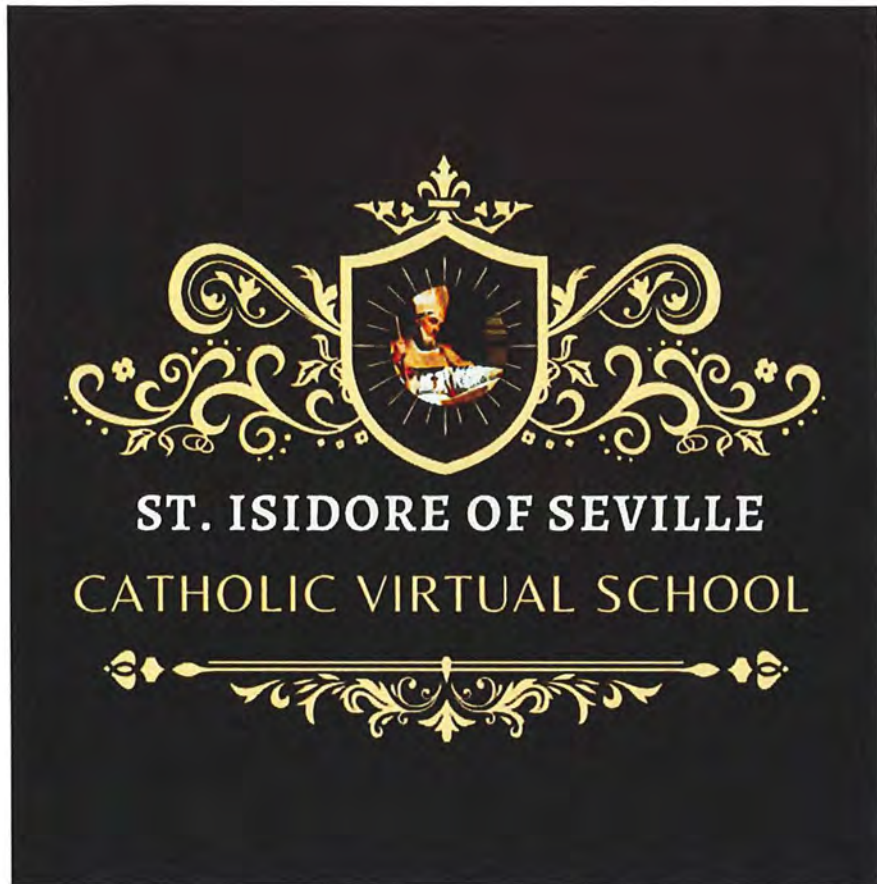
3. Differentiated Instruction – The proposed Learning Management System allows teachers to personalize assignments and content for differentiated instruction. St. Isidore of Seville Catholic Virtual School teachers will be trained to effectively use student data to inform the small group and one-on-one instruction and customize course content for individual students.
4. Progress Monitoring – Teachers will monitor student progress using short-cycle formative assessments, NWEA MAP, i Ready or Renaissance Reading, Math and Early Learning assessments etc. Students will also take a spring norm based national achievement test such as, the CLT, Iowa Assessments or Terra Nova. Other recommended or required testing will be considered and/or implemented.
5. Whole Student Supports – The Student Services Team (SST) will empower students to overcome academic, social, emotional, mental health challenges to succeed in school and their community. Testing arrangements, parent information meetings, accommodations, and modifications, if necessary, will be created, documented and implemented within a Student Service Plan.
6. Student Engagement and participation – Teachers have multiple data sources to monitor student engagement and participation. They will use that data to understand how students spend their time in the system and offline. With this data, teachers can help get students back on track if they struggle or need academic challenges.

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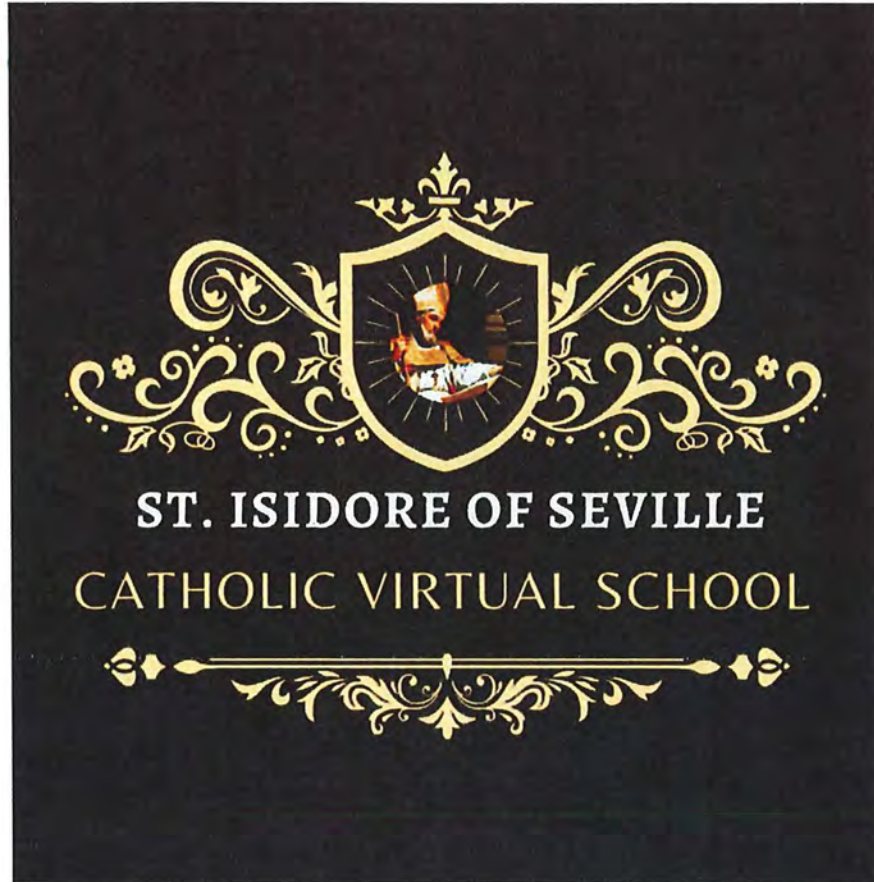
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Appendix B: Preopening Requirements Template
Appendix C: Archdiocese of Oklahoma City Catholic Schools Virtual Employee Handbook
Appendix D: Enrollment Charts
Appendix E: School Calendar
Appendix F: Governing Board Documents
Appendix G: Start-up Plan
Appendix H: Budget Documents
Appendix I: Archdiocese of Oklahoma City Letter of Support
Appendix J: OCCSAA/ OPSAC Accreditation
Appendix K: Organization Chart
Appendix L: In-Year Professional Development Calendar
Appendix M: Tax Exempt/ IRS Letter
Appendix N: Attorney General Opinion, Dec.1, 2022



Section 4: Virtual Charter School Training

*Please see completed certificate in Appendix A.



Section 5: Justification for Application

Legal issues that may be applicable to the consideration of the St. Isidore of Seville Catholic Virtual School Application for Initial Authorization as an Oklahoma charter school, including the legal basis for religious reason aligning to Oklahoma statute, the Oklahoma Constitution, and the United States Constitution for approval of the application

This item appears to request our view on whether state and federal law would allow the operation of a religious virtual charter school in Oklahoma. As described below, though Oklahoma’s virtual charter law purports to prohibit the operation of a religious school, it is our position that such a prohibition violates both Oklahoma’s Religious Freedom Act and the United States Constitution and therefore cannot be enforced. Stated differently, not only *may* a charter school in Oklahoma be religious but indeed it would be *unlawful to prohibit* the operation of such a school.

A. Oklahoma Charter School Act

As you know, Oklahoma’s Charter School Act purports to ban religiously affiliated charter schools. The Act states that “[a] charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations,” and it further provides that “[a] sponsor may not authorize a charter school or program that is affiliated with a nonpublic sectarian school or religious institution.”¹ Thus, though the Act allows private secular entities to operate charter schools, it purports to prohibit charter schools from affiliating with any religious organization or integrating religion into their programs.

The pertinent question, however, is not whether Oklahoma’s charter school statute purports to ban religious charter schools. The question is whether it would be lawful for the Board or the State of Oklahoma to actually enforce such a prohibition. The answer to that question is no.

B. Oklahoma Religious Freedom Act

First, it appears that the Charter School Act’s prohibition on religious charter schools would violate Oklahoma’s Religious Freedom Act.² That Act prohibits any Oklahoma governmental entity from “substantially burden[ing] a person’s free exercise of religion,” even through a “rule of general applicability,” unless the government can show that doing so is “*essential* to further a compelling government interest” and is “the *least restrictive means* of furthering that compelling governmental interest.”³ As recently amended, the law makes clear that it is a substantial burden “to exclude any person or entity from participation in or receipt of governmental funds, benefits, programs, or exemptions based solely on the religious character or affiliation of the person or entity.”⁴

¹ 70 Okla. Stat. § 3-136(A)(2).

² 51 Okla. Stat. § 251, et seq., *as amended by* Okla. S.B. No. 404 (May 2, 2023).

³ 51 Okla. Stat. § 253 (emphasis added).

⁴ Okla. S.B. No. 404, § 1 (May 2, 2023) (to be codified at 51 Okla. Stat. § 253(D)). This addition becomes effective November 1, 2023. *Id.* § 3.

The Act would plainly apply to the exclusion of a religious school from Oklahoma's Virtual Charter School program. For this reason alone, the Board and the State may not enforce the Charter School Act's prohibition against such schools.

C. United States Constitution

Second, notwithstanding the Oklahoma Religious Freedom Act, any exclusion of religious schools from Oklahoma's Virtual Charter School program would be unconstitutional.

Recent decisions of the United States Supreme Court make clear that States may not exclude religious schools from participating in public benefit programs that support K-12 education. Indeed, since 2017, the Court has invalidated *three* separate attempts by States to exclude religious schools from participating in such programs. First, in *Trinity Lutheran Church of Columbia, Inc. v. Comer*, the Supreme Court struck down a Missouri policy that barred religious entities from receiving grants to install playground improvements at schools and daycares, explaining that such a prohibition was a "clear infringement on free exercise" of religion, as protected by the First Amendment.⁵ Second, in *Espinoza v. Montana Department of Revenue*, the Supreme Court held that Montana "cannot disqualify some private schools solely because they are religious" from participating in Montana's scholarship tax credit program.⁶ And third, in *Carson v. Makin*, the Supreme Court held that Maine could not prohibit schools that "promote[] a particular faith" or "present[] academic material through the lens of that faith" from the State's high school tuition assistance program.⁷ The Court wrote that prohibiting these benefits from flowing to religious schools and religious families "is discrimination against religion" and, as such, "is odious to our Constitution and [can]not stand."⁸

The command of the U.S. Supreme Court's recent cases is that, although "[a] State need not subsidize private education[,] once a State decides to do so, it cannot disqualify some private schools solely because they are religious."⁹ The question whether Oklahoma may prohibit religious charter schools thus becomes whether those schools are—for purposes of federal constitutional law—"state actors" or are instead entitled to the same constitutional protections as other privately operated schools. Importantly, that question is *not* whether charter schools are nominally designated as "public" schools under Oklahoma law. Rather, the U.S. Supreme Court has explained that "state action may be found if, *though only if*, there is such a 'close nexus between the State and the challenged action' that seemingly private behavior 'may be fairly treated as that of the State itself.'"¹⁰

Charter schools in Oklahoma are not "state actors" for this purpose, regardless how they might be labeled. Oklahoma charter schools are not operated in any meaningful way by the State but are subject only to broad oversight, with private—including even *for profit*—organizations given control over their day-to-day operations. Among other things, the State makes clear that charter schools are "not required to adhere to the Teacher and Leader Effectiveness standards set

⁵ 582 U.S. 449, 466 (2017).

⁶ 140 S. Ct. 2246, 2261 (2020).

⁷ 142 S. Ct. 1987, 2001 (2022) (quotation omitted).

⁸ *Id.* at 1996, 1998 (quotation omitted).

⁹ *Id.* at 2000 (quotation omitted).

¹⁰ *Brentwood Acad. v. Tenn. Secondary Sch. Athletic Ass'n*, 531 U.S. 288, 295 (2001) (quoting *Jackson v. Metro. Edison Co.*, 419 U.S. 345, 351 (1974)) (emphasis added).

by the state of Oklahoma” and that the State’s primary method of control over any given school is its ability to terminate its charter—not to alter its curriculum or methods of operation.¹¹ In short, the State may choose to award or to end a contract with a charter school, but the State does not run it. Indeed, the very purpose of Oklahoma’s charter school program is to “[e]ncourage the use of different and innovative teaching methods,” “create different and innovative forms of measuring student learning,” and “[p]rovide additional academic choices for parents and students.”¹² Thus, Oklahoma, like many other states, has taken a “hands-off” approach to charter-school administration, exercising only broad oversight. Just last year, *ten states* filed a brief in the Supreme Court arguing that their own charter schools are not “state actors” for these very reasons.¹³

We understand that this is a divisive issue and one on which Oklahoma’s two most recent Attorneys General have taken opposing views. We refer the Board to former Attorney General John O’Connor’s opinion letter to this Board from December 2022 for a much more thorough discussion of these issues.¹⁴ Regardless whether that letter was later rescinded on procedural grounds, we agree with its detailed analysis of this issue and its conclusion that Oklahoma charter schools are not “state actors.” And, for the reasons stated above and as well explained in Attorney General O’Connor’s opinion, because such schools are private actors, Oklahoma may not prohibit them from being religious.

D. Oklahoma’s “Blaine Amendments”

Further, we are aware that the current Oklahoma Attorney General’s Office has suggested that approving a religious charter school would violate provisions of the Oklahoma Constitution (so-called “Blaine amendments”) which purport to require a “system of public schools . . . free from sectarian control” and to deny any “public money” from being “used, directly or indirectly, for the use, benefit, or support of any sect, church, denomination, or system of religion, or for the use, benefit, or support of any priest, preacher, minister, or other religious teacher or dignitary, or sectarian institution as such.”¹⁵ First, as explained in Attorney General O’Connor’s opinion letter, it is not clear that such provisions would even apply here.¹⁶ More importantly, even if these provisions *were* interpreted to apply to the State’s charter school program, the State would be precluded by the United States Constitution from invoking them to prohibit religious charter schools.

Indeed, in two of the recent Supreme Court cases discussed above, the Court rejected attempts by States to do exactly what this question contemplates. Indeed, in *Trinity Lutheran*, the Missouri Department of Natural Resources had denied a religious daycare’s application to participate in the playground resurfacing program specifically because the Department believed

¹¹ See *Oklahoma Charter Schools Program*, Oklahoma State Department of Education, <https://sde.ok.gov/faqs/oklahoma-charter-schools-program> (last visited May 16, 2023).

¹² 70 Okla. Stat. § 3-131(A).

¹³ See Brief for the States of Texas, Alabama, Alaska, Arkansas, Kansas, Mississippi, Nebraska, South Carolina, Tennessee, and Virginia as Amici Curiae in Support of Petitioner, *Charter Day Sch. v. Peltier*, No. 22-238 (U.S. Oct. 14, 2022).

¹⁴ See Appendix A.

¹⁵ Okla. Const., Art. I § 5, Art. II § 5.

¹⁶ See Appendix A at 6–8.

that giving such funding to a religious organization would violate a nearly identical provision of Missouri's Constitution, which prevented public money from being given to "any church, sect or denomination of religion."¹⁷ The Supreme Court, of course, held that invoking Missouri's Blaine amendment to exclude a religious organization from a public benefit "is odious to our [federal] Constitution . . . and cannot stand."¹⁸

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As discussed above, the Supreme Court explained in *Espinoza* that the First Amendment prohibits a state from creating a public benefit (e.g., Oklahoma's charter school program) and then denying that benefit to recipients because of their religious character, even if the State's constitution purports to require such a result.²⁰ The demands of the First Amendment to the U.S. Constitution are, of course, supreme over any contrary provision of state constitutional law. And thus, the Supreme Court held that Montana's Blaine amendment could not be used as a mechanism to discriminate against religious schools and strike down the scholarship program that would otherwise have been available to them.²¹ Nor, as discussed, can Oklahoma invoke its Blaine amendment to prohibit the State's charter school program from supporting schools that "promote[] a particular faith" or "present[] academic material through the lens of that faith."²² In either case, the state cannot deny such an opportunity "pursuant to a state law provision that expressly discriminates on the basis of religio[n]."²³

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Ku Klux Klan.²⁶ Know-Nothings and other anti-Catholics spread fear that Catholics would subvert the “distinctively . . . Protestant” public schools of the time by “siphon[ing] off” public money to build a system of independent private schools “for dark Catholic purposes.”²⁷

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²⁶ See *id.* at 2269–72 (Alito, J., concurring).

²⁷ Kyle Duncan, *Secularism’s Laws: State Blaine Amendments and Religious Persecution*, 72 Fordham L. Rev. 493, 502 (2003) (quotation omitted).

²⁸ Steven K. Green, *The Blaine Amendment Reconsidered*, 38 Am. J. Legal Hist. 38, 50 (1992) (quotation omitted); see also *Espinoza*, 140 S. Ct. at 2268 (Alito, J., concurring).

²⁹ *Espinoza*, 140 S. Ct. at 2259 (maj. op.); accord *Mitchell*, 530 U.S. at 828 (plurality op.).

³⁰ Duncan, *supra*, at 514–15; see also *Blaine Amendment Bloodline Obvious in Oklahoma’s Constitution*, The Oklahoman (Aug. 4, 2015), <https://www.oklahoman.com/story/opinion/editorials/2015/08/04/blaine-amendment-bloodline-obvious-in-oklahomas-constitution/60731592007> (describing “anti-Catholic heritage” and “stain of bigotry” of Oklahoma’s Blaine amendment).

³¹ *Espinoza*, 140 S. Ct. at 2269–70 (Alito, J., concurring).

³² See *id.* at 2268, 2272.

³³ See *id.* at 2267–68.

³⁴ See Application at 79–80, 139.

entitled to accommodations under particular provisions of some laws. The fact of such exemptions does not “violate” those laws, and there is certainly no barrier to the Board approving a school that will operate consistently with its particular legal rights and obligations.

Second, in rescinding then-Attorney General O’Connor’s letter to the Board, current Attorney General Gentner Drummond suggested that there might be some legal problem using state funding to support religious schools. The many Supreme Court cases discussed above show the opposite. Once again, the Court there made clear: “A State need not subsidize private education. But once a State decides to do so, it cannot disqualify some private schools solely because they are religious.”³⁵

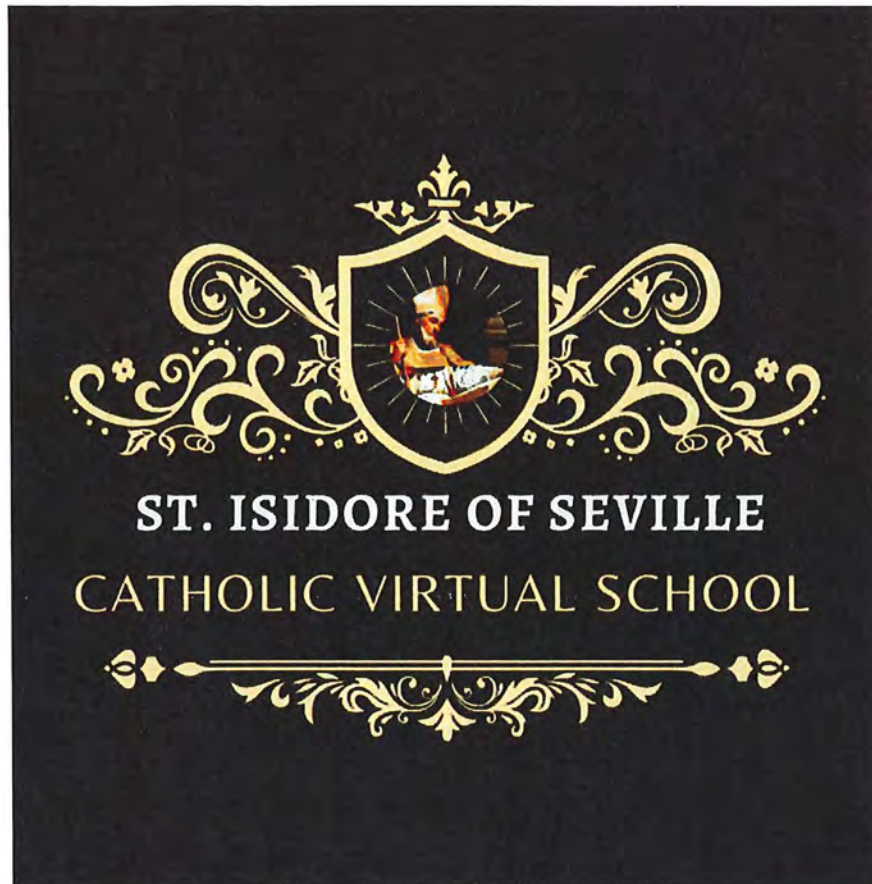
Nor is there any constitutionally relevant distinction between using state funds to support private religious schools through Oklahoma’s charter-school program or through the grants, tax credits, and scholarship programs approved in these cases. In the first instance, the particular *method* of state funding and how it was distributed to religious schools was not the issue in those cases. The problem was the simple *fact* that the State had created a generally available benefit program from which religious schools had been excluded. Indeed, in *Trinity Lutheran*, the Court rejected Missouri’s asserted interest in refusing to provide playground improvement funds “directly” to a religious school.³⁶ Moreover, even if the route and mechanism by which state funds are provided to schools somehow mattered, Oklahoma’s program operates in the same indirect fashion as many other school-choice programs. Oklahoma’s program funds virtual charter schools on a per-pupil basis; thus, virtual charter schools receive money through the private, independent choice of families, none of whom are compelled to send their children to a charter school.³⁷ Thus, even if there were some constitutionally relevant distinction between “directly” subsidizing private religious education and doing so “indirectly,” that distinction is irrelevant here. Once again, Attorney General O’Connor’s opinion addresses this issue in greater detail.³⁸

³⁵ *Carson*, 142 S. Ct. at 2000 (quotation omitted).

³⁶ See 137 S. Ct. at 463; *id.* at 472 (Sotomayor, J., dissenting) (arguing that the majority should not have allowed the government to “directly fund religious exercise”).

³⁷ See Okla. Statewide Virtual Charter School Board, *Oklahoma Virtual Charter School Funding Study* 11–12 (June 2021), https://svcsb.ok.gov/sites/g/files/gmc806/f/documents/2021/okvirtualfundingstudy_final7.1.21_-_svcsb_website_version.pdf.

³⁸ See **Appendix A** at 7–8 (independent parental choice “break[s] the circuit between government and religion”); *id.* at 9–14 (finding no Establishment Clause barriers to religious charter schools and rejecting relevant distinctions with the programs in *Trinity Lutheran*, *Espinoza*, and *Carson*).



Section 6: Development for the Proposed School Charter

Vision and purpose of the organization

St. Isidore of Seville Catholic Virtual School is organized and will be operated exclusively for educational, charitable, and religious purposes. The school will operate as an Oklahoma virtual charter school established pursuant to the Oklahoma Charter School Act, 70 O.S. § 3-130 et. seq. Subject to the foregoing and other limitations set forth in the Certificate of Incorporation, the School shall have and exercise all the powers of nonprofit corporations under Oklahoma law.

Without limiting the generality of the foregoing, to the extent permissible under the Oklahoma Charter Schools Act, the School's purposes, activities, programs, and affairs shall include the following:

- A. To create, establish, and operate the School as a Catholic School. "It is from its Catholic identity that the school derives its original characteristics and its 'structure' as a genuine instrument of the Church, a place of real and specific pastoral ministry. The Catholic school participates in the evangelizing mission of the Church and is the privileged environment in which Christian education is carried out. In this way 'Catholic schools are at once places of evangelization, of complete formation, of inculturation, of apprenticeship in a lively dialogue between young people of different religions and social backgrounds.'" Congregation for Catholic Education, *The Catholic School on the Threshold of the Third Millennium* ¶11 (1997).
- B. To operate a "school [that] sets out to be a school for the human person and of human persons. 'The person of each individual human being, in his or her material and spiritual needs, is at the heart of Christ's teaching: this is why the promotion of the human person is the goal of the Catholic school.'" Congregation for Catholic Education, *The Catholic School on the Threshold of the Third Millennium* ¶9 (1997). The heart of this mission "is oriented toward an integral formation of each student." Sacred Congregation for Catholic Education, *Lay Catholics in Schools: Witnesses to Faith* ¶28 (1982).
- C. To operate a school that understands "[t]he truth is that only in the mystery of the incarnate Word does the mystery of man take on light. ... [Christ] fully reveals man to man himself and makes his supreme calling clear." Vatican II, *Gaudium et Spes* ¶22 (1965). The truth of the human person and the person's ultimate destiny is learned and understood through faith and reason, theology and philosophy, including the study of the natural sciences. There is a "profound unity which allows [faith and reason] to stand in harmony ... without compromising their mutual autonomy." St. John Paul II, *Fides et Ratio* ¶48 (1998).
- D. To operate a school that educates its students for freedom, understanding that "in order to be authentic, freedom must measure itself according to the truth of the person, the fullness of which is revealed in Christ, and lead to a liberation from all that denies his dignity preventing him from achieving his own good and that of others." Congregation for Catholic Education, *Consecrated Persons and Their Mission in Schools: Reflections and Guidelines*, ¶37 (2022).
- E. To assist and accompany parents in their obligation to educate their children. *Code of Canon Law*, Canons 793-806; Vatican II, *Declaration on Christian Education* ¶3 (1965). This obligation includes forming and cultivating students to
 - a. See and understand truth, beauty and goodness, and their author and source – God. *Catechism of the Catholic Church* ¶2500;

- b. Know that among all creatures, the human person is the only one created in God's image with the ability to know and love God, and that God created persons male and female. *Catechism of the Catholic Church* ¶355-379;
 - c. Know that because of sin humanity was separated from God, but in God's love He has provided a path to salvation through the saving power of Christ, the second person of the Trinity, in His suffering, death and resurrection. *E.g.*, *Catechism of the Catholic Church* ¶651-655;
 - d. Know that in this earthly sojourn, each person is called to participate in Christ's suffering and death by daily taking up their own cross and following Him. *Catechism of the Catholic Church* ¶618;
 - e. Know that human persons are destined for eternal life with the Holy Trinity, *e.g.*, *Catechism of the Catholic Church* ¶1720-1724, but that in freedom, an individual may reject God's invitation and by this "definitive self-exclusion" end up in hell, *Catechism of the Catholic Church* ¶1033;
 - f. Engage in the lifelong task of forming one's conscience to know good from evil and developing the will to do good and avoid evil, *Catechism of the Catholic Church* ¶1749-1794;
 - g. Develop habits of the intellect and will allowing one to live a virtuous life, *Catechism of the Catholic Church* ¶1784, 1803-1829; and
 - h. Develop mind and body according to each student's ability so that the student may go into the world, participating in the transformation and development of society by the efforts of his or her labor, *Catechism of the Catholic Church* ¶1877-1889.
- F. To provide rigorous high-quality educational opportunities to prepare students for professional life. Vatican II, *Declaration on Christian Education* ¶5 (1965).
 - G. To operate a school in harmony with faith and morals, including sexual morality, as taught and understood by the Magisterium of the Catholic Church based upon Holy Scripture and Sacred Tradition.
 - H. To hire educators, administrators, and coaches as ministers committed to living and teaching Christ's truth as understood by the Magisterium of the Roman Catholic Church through actions and words, using their commitment to Christ and his teachings in character formation, discipline, and instruction, and to live this faith as a model for students.
 - I. To contribute to the common good of society by 1) putting the Church at the service of the community in the realm of education, 2) providing an example of an education directed toward the whole person – body, mind, soul and spirit -while rejecting the idea of a partial education directed solely toward mind and body; 3) sharing with parents, the state, and other educational institutions the universally recognized obligation to educate the young; 4) its openness to accept students of all faiths or no faith who appreciate and desire a robust Catholic education; and 5) guaranteeing cultural and educational pluralism, providing families to educate their children according to the dictates of their consciences. Congregation for Catholic Education, *The Catholic School on the Threshold of the Third Millennium* ¶16 (1997).

- J. To establish policies, plans, and procedures for the implementation and administration of the designated purposes;
- K. To enter into agreements with outside entities, including the Archdiocese of Oklahoma City and the Diocese of Tulsa, in connection with the foregoing purposes; and
- L. To fulfill such other purposes and functions, consistent with the Oklahoma Charter Schools Act and Oklahoma law, as the Board shall determine from time to time.

The St. Isidore Catholic Virtual Charter School envisions a learning opportunity for students who want and desire a quality Catholic education, but for reasons of accessibility to a brick-and-mortar location or due to cost cannot currently make it a reality. The Catholic education system has routinely matriculated students prepared not only for the next stage in life but prepared to be successful in life itself as good members of the community who take an active role in caring for others, being innovative in the development of new products and services, and serve as leaders in local, state, and global corporations, small business, government, and military. The ability to teach from a faith and reason perspective opens up for the student the best of the Catholic intellectual tradition, much of what the public educational system in the United States is modeled after in its design and course requirements. A liberal arts education prepares students to think critically and to be well read and well written individuals who care about their generation and those to follow. It is the desire of the school to reach those students wherever they may be in Oklahoma.

St. Isidore of Seville Catholic Virtual Charter School envisions the ability to offer to students who wish to supplement their current school program the option of various accelerated courses or courses that will accelerate the student beyond their current status, such as in the areas of foreign language, computer programming courses of various types, mathematics, and special interest electives. Credit recovery for core subject areas would also be available for students to enroll in order to fulfill their grade level requirements.

St. Isidore of Seville Catholic Virtual Charter School envisions an experience that combines the best of online instruction with its capacity for individualized flexible learning. Our statewide virtual charter school, serving all K-12 grades, will feature an innovative and interactive curriculum, fully aligned to the Archdiocese of Oklahoma City standards and benchmarks which meet or exceed the Oklahoma Academic Standards and the national standards, and will teach by talented, certified teachers. Teacher-led instruction will include synchronous and asynchronous learning opportunities, one-to-one tutoring, organized peer interaction, and a focus on critical skills for success in learning, which will lead to success at the next level of education, college, trade school, and in life.

St. Isidore of Seville Catholic Virtual Charter School will establish key institutional partners in the state, to further technical and trade opportunities to permit students to pursue workplace learning opportunities either during their time at St. Isidore of Seville's or upon graduation. The school will seek partnerships with higher education institutions to permit students to participate in Oklahoma's Promise program to enable students to take advantage of post-secondary college and career opportunities. Each student will have a College and Career Readiness Plan and the school will support students in pursuing their post-secondary goals, whether that includes entering the workforce, college enrollment, military

enlistment, or other pathways. We will partner with our families to ensure they have the appropriate resources to support their student's engagement and learning. This includes comprehensive student and parent onboarding programs to ensure students are ready to learn and parents are ready to support.

Mission of the proposed school

The mission of St. Isidore of Seville Catholic Virtual School is to educate the entire child: soul, heart, intellect, and body of each child enrolled through a curriculum that will reach students at an individual level, with an interactive learning environment that is rooted in virtue, rigor, innovation, and integrity. We are dedicated to academic excellence that empowers and prepares students for a world of opportunity and a lifetime of learning.

St. Isidore of Seville Catholic Virtual School envisions a learning experience that combines the best of online instruction with its capacity for individualized flexible learning. Our statewide Catholic virtual school, serving all K-12 grades, will feature an innovative and interactive curriculum, which meets or exceeds the Oklahoma Academic Standards, and taught by talented Oklahoma state-certified teachers. Teacher-led instruction will include synchronous and asynchronous learning opportunities, one-to-one tutoring, organized peer interaction, and a focus on critical skills for success in college or trade school, the workforce, and life.

At the high school level, St. Isidore of Seville Catholic Virtual School will seek partnerships with higher education institutions to permit students to participate in AP Courses, early enrollment, dual credit and internships. Each student will have a grade level appropriate College/Career Plan and the school will support students in pursuing their post-secondary goals, whether that includes college enrollment, entering the workforce, military enlistment, or other pathways. At the K-8 level, the focus is on building skill and background in the key subjects of the curriculum to allow for advancement to the next level and to develop a strong moral character in the child that will serve them well in life.

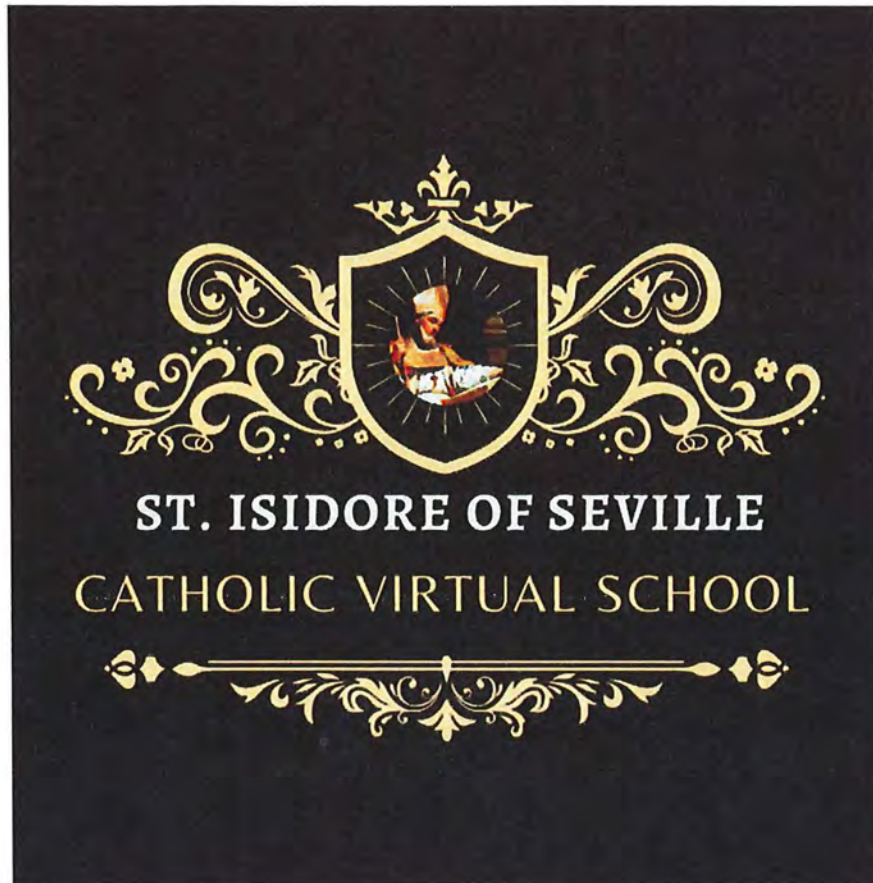
Key elements of school design that align with and support the mission.

The key elements of the St. Isidore of Seville Catholic Virtual program are to ensure success at the next level of education and life. This is done in the following ways:

1. Integrated Curriculum- Teachers will integrate the humanities and teach across the curriculum in Literature, English, History/Soc. Studies, and Theology to create a cohesive understanding of the material to build background knowledge for future courses and paths of study. Teachers will utilize discovery-based approaches and integrate science with math, music, architecture, and religion.
2. Rigorous Academics with a wide array of course offerings that span the liberal art spectrum for all abilities. Course work will meet or exceed the Oklahoma and national standards. Students will use the current Archdiocese of Oklahoma Curriculum Standards and Benchmarks as well as strategies and methodologies that are suitable for virtual learning such as Socratic method for discussion; reading, interpreting, recitation, memory work, literature and other genres for reading; writing for purpose and writing creatively, and project-based learning based on unit themes. Routinely, the Archdiocese of Oklahoma City and the Diocese of Tulsa review a subject

area and make the necessary changes for best practice and to keep in alignment with state and national standards.

3. Differentiated Instruction – The proposed Learning Management System allows teachers to personalize assignments and content for differentiated instruction. St. Isidore of Seville teachers will be trained to effectively use student data to inform the small group and one-on-one instruction and customize course content for individual students.
4. Progress Monitoring – Teachers will monitor student progress using short-cycle assessments, NWEA MAP, i Ready or Renaissance Reading, Math and Early Learning assessments etc. Students will take a spring norm based national achievement test such as, the CLT, Iowa Assessments or Terra Nova. Dyslexia and dyscalculia screeners will be utilized for all students. Other recommended or required testing will be considered and/or implemented.
5. Whole Student Supports – The Student Services Team (SST) will empower students to overcome academic, social, emotional, mental health challenges to succeed in school and their community. Testing arrangements, accommodations, and modifications, if necessary, will be made and implemented within a Student Service Plan.
6. Student Engagement and participation – Teachers have multiple data sources to monitor student engagement and participation. They will use that data to understand how students spend their time in the system and offline. With this data, teachers can help get students back on track if they struggle or need academic challenges.



Section 7: Organizational Capacity

ORGANIZATIONAL STRUCTURE

Demonstrated experience in kindergarten through twelfth grade school operations.

Catholic schools have been educating students successfully in the United States and territories since the early 1800's. Here in Oklahoma, Catholic education dates back to 1875 to a classroom of 10 native American and white children. The French Benedictines and the Sisters of Perpetual Adoration and later the Sisters of Mercy and Franciscan sisters embraced the task of education for the Native Americans, immigrant Italians, and white children. By 1930, the enrollment of Catholic students in Oklahoma totaled 8400 students and graduation certificates were signed by the state superintendent of the time, R.H. Wilson. Legislation, two world wars, a series of economic depressions and recessions have all had positive and negative effects on Catholic education in Oklahoma. Catholic education has successfully played a large role in the education of children in Oklahoma for many generations.

Currently in Oklahoma, there are 21 Catholic schools, 18 of which under the umbrella of the Archdiocese in some capacity with a total enrollment of 4756. 16 are elementary schools serving PreK-8th grade, three are high schools, and two are independent schools. In the Diocese of Tulsa there are 9 Elementary schools, one high school and 3 independent Catholic schools under its umbrella with a total enrollment of 4385. Catholic schools in Oklahoma serve 9141 students at this current time.

The National Catholic Education Association in Washington, DC collects data from schools across the country each year. The 2021-22 national data show that Catholic schools continue to educate a diverse population as 21.5% of students are racial minorities, 18.6% are Hispanic, and 20.3% are students of other faiths.* Catholic schools provide at least 22.7 billion dollars a year in savings for the nation. With 1,688,417 students in 5,938 Catholic schools across the country and based on the average public school per pupil cost of \$14,455, Catholic schools provide at least 22.7 billion dollars a year in savings for the nation.* The average cost of tuition for Catholic schools in Oklahoma is \$6700 for diocesan elementary schools and \$13,548 for the diocesan high schools.

*Source: NCEA Data Brief: [Data Brief 22 Catholic School Enrollment v4.pdf \(magnetmail.net\)](#)

1. Academic Achievement and Growth:

The Catholic schools in Oklahoma are known for producing quality students from the elementary to the high school level. The students of 25 feeder schools to our diocesan high schools combine with students from other public and non-public schools located all over both Oklahoma City and Tulsa and come together for a great high school experience. On average, Catholic school students score higher than their counterparts when taking high school placement tests. For example, (N=144) that took the most recent HSPT tests at one of our area high schools (10/29/22 and 11/12/22) and took all the Catholic feeder school students (n=85), and the public schools (n=25). There is no testing prep or practice at the elementary level for students entering high school.

Verbal: Catholic Feeder students scored 11.44 percentile points higher
Quantitative: Catholic Feeder students scored 18.96 percentile points higher
Reading: Catholic Feeder students scored 20.01 percentile points higher
Math: Catholic Feeder students scored 17.97 percentile points higher
Language: Catholic Feeder students scored 23.03 percentile points higher

It is recognized that there are many factors that contribute to the differences of scores, but when just comparing averages from a high vantage point, it appears that our elementary schools are effective in preparing students for the next level of our system. The average SAT score is 1280 and places students in the top 80% of the country. The average comprehensive ACT score among our high schools is 24.7% collectively compared to the state average of 17 as reported by [2022 Average ACT Score by State - OnToCollege](#). Since 2020, the three Catholic high schools have had 10 National Merit Finalist and in excess of 20 Semi-Finalist.

With a 100% graduation rate in the Archdiocese of Oklahoma City and the Diocese of Tulsa, and 98% being accepted to one or more colleges, the proof of academic achievement is in the outcome. Cristo Rey OKC just graduated its first class of seniors in May of 2022. 57 graduates, 54 of them going to college, two going into the workforce and one going into the Navy. All received one or more college offers and taking with them four years of on-the-job work experience. The primarily Hispanic group of students from low-income families has shown that a good work ethic in both academics and the work study programs they participate in are life-changing and open a world of possibilities. Education along with perseverance and self-discipline changes trajectories.

Private School Assessment Information -- September 2008 (MSWord) (capenetwork.org)

2. Social-Emotional Learning

St. Isidore of Seville Catholic Virtual School will implement policies to address the Social Emotional Learning of all our students. Clear expectations of behavior for the staff and students which is outlined in our handbooks. Our primary way of addressing the Social Emotional needs of our students is by first establishing a school climate where students, families, and staff feel loved, respected as a child of God, safe and supported. Staffing around Social Emotional Learning differs based on the needs of the school. For our current schools in Oklahoma City, Catholic Charities has been chosen by the local school district to utilize Title funds for counseling services. Social workers, family liaisons, and/or contract to outside experts can also be leverage with Title funds.

St. Isidore of Seville Catholic Virtual School will purchase supplemental curriculum like Virtues in Practice, Ruah Woods, Friendly, Responsive Classroom, Class Dojo and the FACTS SIS parent connection capability to ensure expectation, content and communications are available to students and families. Professional development in these programs will assist staff in implementing the programs to make a positive impact on student emotional well-being and academic achievement. Training allows staff to make a positive impact on student emotional well-being and academic achievement. Because positive school climate and SEL is a schoolwide focus, all staff receive professional development. *Responsive Classroom* is a student-centered approach to teaching and discipline that comprises a set of research- and evidence-based practices designed to create safe, joyful, and engaging classroom communities for both students and teachers. Schools and teachers who adopt the *Responsive Classroom* approach focus on creating optimal learning conditions for students to develop their academic, social, and emotional skills and building positive school and classroom community where students learn, behave, hope, and set and achieve goals.

Professional development is used to assist staff in implementing the programs to make a positive impact on student emotional well-being and academic achievement. After receiving training, teachers are able to advocate for their students, provide them with the tools and resources to develop positive relationships, make good decisions, solve problems, and communicate appropriately within the

school community. The expectation is that the program will reduce student conflict, reduce referrals, and help create a positive and collaborative school climate.

3. Successful management of non-academic school functions

Schools must not only have a rigorous academic program with strong leaders and teachers, but they must also have a supportive culture and strong family involvement. With that in mind, we understand that one of the primary reasons why schools fail is they are not financially sound. The partnership between the Board, the school financial officer, the Archdiocese of Oklahoma City and the Diocese of Tulsa is strong to ensure that the school thrives financially. The Board, the school financial officer, and both dioceses will work closely on a monthly basis to analyze financial information so the Board can make policy decisions that will both improve academic achievement and maintain the fiduciary responsibility for the school. Both the Diocese of Tulsa and the Archdiocese of Oklahoma City have proven financial controls in place and are on solid footing both in cash and investment management.

4. Location/description of school administration facility(ies), including backup or contingency plans

St. Isidore of Seville Catholic Virtual Charter School administrative offices will be housed at the Catholic Pastoral Center in Oklahoma City, 7501 NW Expressway, Oklahoma City, OK 73132. The majority of the staff will work remotely. The office will include at least one meeting room that can also serve as a Board meeting location, closed-door offices for school administrators, a locked storage room for student records, IT oversight, staff breakroom and dining hall for all CPC staff, and temporary offices for visiting school staff or diocesan support staff. The office is ADA compliant.

ORGANIZATIONAL DESIGN

1. Lines of authority and accountability

2. Leadership roles and responsibilities

3. Descriptions of duties

4. Advisory bodies

5. External organizations/service providers (as applicable to school management)

Please reference the included organization chart for the school-**Appendix K** and the **Attachment F** Amended Bylaws.

The St. Isidore of Seville Board of Directors is the governing body that would have oversight of the Principal/Director of the school who will work closely with the Education Management Office assigned by the Board of Directors. This will initially be the Archdiocese of Oklahoma City Department of Catholic Education which will assist the Principal/Director of St. Isidore of Seville Catholic Virtual School to manage policy, procedure, curriculum requirements, digital platform, and human resource oversight. The Principal/Director will operate the school, collaborate with the board finance chair, bookkeeper, independent School Treasurer and Encumbrance Clerk, and work with the already contracted counsel. The St. Isidore of Seville Board of Directors will hold all parties accountable for the academic, operational, and financial outcomes of St. Isidore of Seville Virtual Catholic School.

The St. Isidore of Seville Board of Directors will provide input on the Principal/Director evaluation and the Principal/Director would evaluate the junior administrative staff and faculty of the school.

The Principal/Director, working within the parameters defined by the Board of Directors and within the guidelines set by Archdiocese of Oklahoma City and Diocese of Tulsa, is responsible for the overall day-to-day management of the school. The Principal/Director will preferably have master's degrees in both Education and Business and will have previously served as the principal of a similarly sized school in Oklahoma. Prior online learning program experience is also preferred, but not required. The principal/director will be responsible for the general education program at the school, which includes, but is not limited to, ensuring that the defined instructional model is successfully implemented at the school, and supervising and evaluating the teaching staff. The principal will have prior experience as a school principal or assistant principal, preferably within the state of Oklahoma.

The Business Director will be responsible for managing the non-academic operations and state reporting at the school. This person will be responsible for ensuring that students are properly enrolled in the school and that all learning and financial platforms are successfully implemented and maintained at the school. The Business Director is also responsible for ensuring that school reporting requirements are met in an accurate and timely fashion.

The Special Education Director will be responsible for overseeing the special education program for the school. This position will ensure that the school special education program conforms to state and federal laws and is implemented with fidelity. Special Education teachers will report to the Special Education Director for supervision and evaluation. The Special Education Director will have appropriate professional licensure and will have had prior supervisory experience in an online school and experience with the provision of special education services in an online setting.

The School Counselor will be responsible for ensuring that students are progressing appropriately towards a high school diploma. The school counseling department will communicate directly with students and parents about academic and graduation requirements and will assist students who need help navigating college and career pathways. The School Counselor will also be available to connect students to community resources, as needed.

The CTE Coordinator will be a shared service position within the dioceses and falls within the counseling department and has the chief responsibility to develop and implement a comprehensive career readiness program. This includes working collaboratively with administrators, student's services staff, and teachers to ensure the delivery of career development services. The CTE coordinator also facilitates partnerships with parents, business/industry, postsecondary institutions, and community organizations to support students' successful transition to postsecondary education and employment.

Other diocesan shared service positions such as a business/financial analyst, a technology manager, an HR/payroll manager, and a community/marketing manager will be assigned to the school to help with business, technology, HR, and marketing functions for St. Isidore of Seville Catholic Virtual School.

The primary responsibility of the School Treasurer is to receive and disburse monies of the school as provided by law and to maintain an accurate accounting of such receipts/disbursements. The School Treasurer must adhere to the principles and procedures defined in the Oklahoma Cost Accounting System (OCAS). The Encumbrance Clerk's overall responsibility is to maintain the Appropriation and Encumbrance Ledger and ensure that encumbrances do not exceed appropriations, and are for the

purpose of the appropriation charged. As defined in the by-laws, the St. Isidore of Seville Board of Directors Finance Director will work closely with the School Treasurer and with the school administration.

Leadership and Teacher Employment and Personnel Policies

The school will employ certified teachers who are Highly Qualified with a priority on teachers with virtual learning experience and Oklahoma state certification. To ensure the best quality of educators, we will recruit candidates that we believe will: embody the core values of the school, participate in continuous, research based professional development to hone their craft, demonstrate a passion for personal improvement, are willing to be held accountable for student learning, and who will effectively and regularly communicate with parents, other teachers, and the school leadership. We will provide numerous professional development opportunities for our teachers, will support them with a full-time online trainer, and will reward teachers for high quality performance.

We will advertise positions widely using general and education-focused job boards including Oklahoma Public School Resource Center (OPSRC), Teach Oklahoma, NCEA, Catholicjobs.com, SchoolSpring, LinkedIn, Indeed, Handshake, university sites and career fairs, as well as one-to-one in person and virtual recruiting.

In addition to posting positions on job boards, recruiters will actively reach out to candidates through various channels to inform them of new opportunities they may not be aware of or actively seeking. We offer a referral bonus incentive program to leverage our national network of staff to recruit and hire qualified teachers across the US. Additionally, we utilize social media campaigns in tandem with our student enrollment efforts to drive school and brand awareness and attract a wider audience of candidates. We will conduct a thorough interview process with multiple stages to identify top candidates. Once top candidates are identified, we will conduct comprehensive background reference checks to include recent supervisors. Compensation and benefits are key recruitment and retention tools. Some strategies employed to recruit desirable candidates include:

- 1) salary structures that recognize educational attainment and experienced teachers' prior years of service
- 2) the use of sign-on bonuses when credentialed teachers are in short supply,
- 3) the use of performance-based incentives that are tied to student and school achievement,
- 4) the opportunity to participate in supplemental activities such as tutoring programs,
- 5) the opportunity to perform supplemental duties such as Lead Teacher or Teacher Mentor and
- 6) an affordable and attractive set of health, education, and supplemental benefits.

The school will offer full-time regular employees a comprehensive slate of health and welfare benefits including medical, dental, and vision insurance through national carriers, life and disability insurance, flexible spending accounts, a retirement plan with generous employer contributions, and Paid Time Off (PTO). The Archdiocese of Oklahoma City Employee Handbook is included as **Appendix C**.

Professional Development and Training Plan

Learning best occurs when the teachers are well-prepared, best practices are employed, the students are engaged, and the lessons suit individual needs. The ideal teacher hire will have prior teaching experience at both brick-and-mortar schools and in online environments. Prior to beginning their work

with students in mid-July, staff will receive thirty hours of robust staff development via both synchronous live training sessions and asynchronous course work. This professional development will concentrate on all the applicable technologies that their students will also use. Five additional professional development training days will be scheduled during the school year. Teachers may also attend any professional development offered by the Archdiocese of Oklahoma City.

Asynchronous training course work will be completed in the same Learning Management System that students will use, helping teachers to understand the student learning experience more deeply. Specific attention will be paid to topics such as how to build and maintain student engagement, using data to inform instruction and differentiation, how to reach all learners through Universal Design for Learning, identifying and addressing skill gaps, boosting achievement within at-risk student subgroups and other topics as needed.

St. Isidore of Seville Catholic Virtual School's educational approach features an innovative curriculum, a high degree of connectivity and personalized attention, intensive teacher training and inquiry-based student-centered learning. Its program focuses on practical application of knowledge and strong parent and community involvement with St. Isidore of Seville Catholic Virtual School. Through effective use of technology, it enables teachers to custom-tailor academic programs to students' unique skills and interests – all aimed at optimizing our students' learning experience.

Personalized instruction and continuous assessment are cornerstones of the St. Isidore of Seville Virtual Catholic School model. All staff will receive professional development in online student engagement, boosting achievement in the online environment, SEL in the online environment, working with subgroups in the online environment, testing data analysis, developing student writers, and other topics. Teachers will have both in person and online modalities offered. Along with participation in online professional learning communities, staff will be trained in techniques of differentiated instruction, enabling them to identify students' learning styles and to create learning activities compatible with the students' needs. At the same time, the staff will use varied assessments to enable students to demonstrate their understanding of concepts and skills. These assessments will also be used to develop further lessons that address individual student needs.

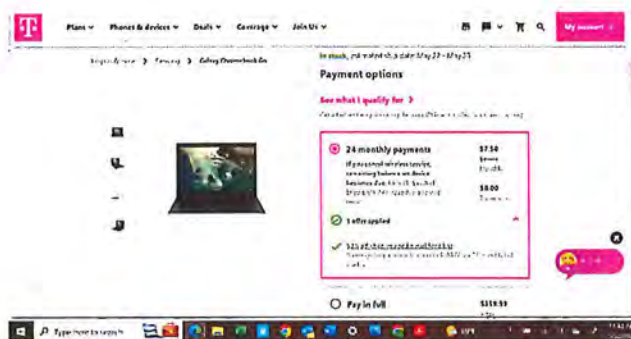
The Archdiocese of Oklahoma Department of Catholic Education evaluates professional development needs by using surveys, interviews and observation; and the experience of the personnel, who remain up-to-date on new as well as tried and-true teaching methods and strategies. Staff will receive up to two weeks of training which will take place before the school year begins, and ongoing training will continue throughout the school year, based on detailed assessments of staff needs. Keeping great school leaders and teachers is an ongoing effort. A sample schedule of training events is included.

Description of Technology Capacity

All students will receive a loaned laptop computer (Chromebook Go) at no additional cost. This device will have internet access via one of the three major cellular providers, T-Mobile, AT &T, and Verizon due to rural areas not having adequate internet access. Utilizing cell towers is the best way to access the internet if cable or fiber has not yet been installed. Cellmapper.net is an app that assists in determining which cellular companies are utilizing which towers that are currently available in Oklahoma.

The following images illustrate clearly the information that was recently obtained from the Cellmapper.net website. The state of Oklahoma is outlined in gray. As it clearly indicates, T-Mobile has the best 4G and 5G coverage in the state.

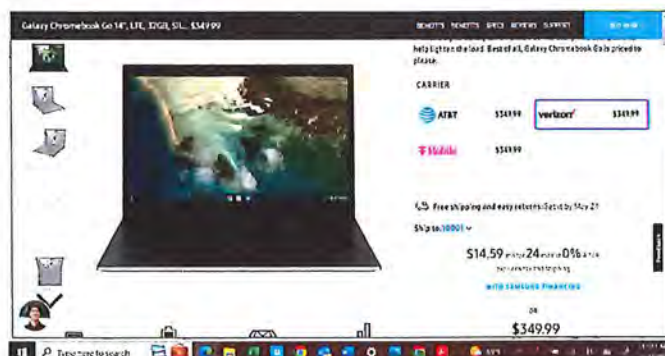
Chromebooks now are available with data plans that can be linked to a cellular data plan. They are very reasonable in cost, ranging from \$4.37- \$9.92. T-Mobile's price is \$7.50/month per device and is included in the price of the device with a two-year contract. AT&T and Verizon both have similar plans. St. Isidore of Seville Catholic Virtual School will determine the address of the student and use the plan that will best meet their needs. Additional hotspots can also be issued if needed. 100 hotspots are included in the budget.



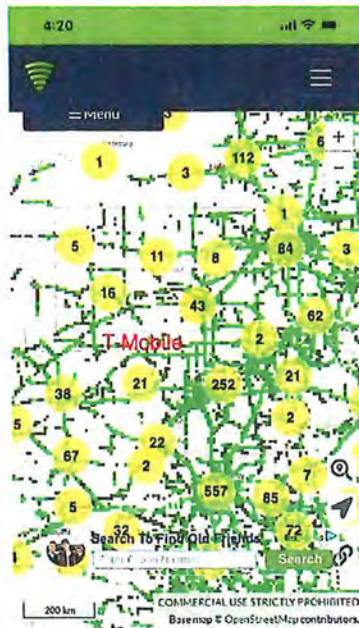
[Samsung Galaxy Chromebook Go | 1 color in 32GB | T-Mobile](#)



[Samsung Galaxy Chromebook Go – Specs, Pricing & Reviews | AT&T \(att.com\)](#)



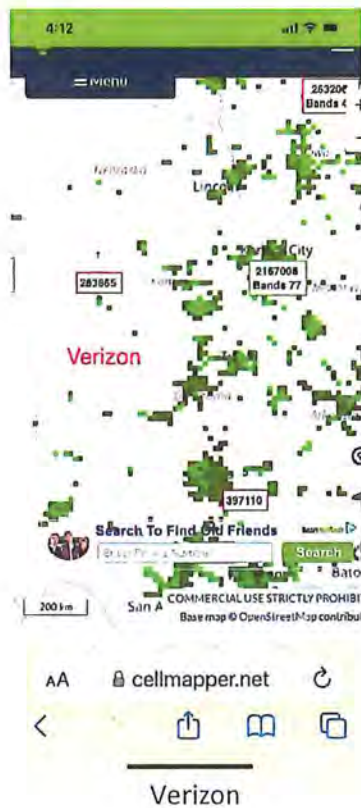
Galaxy Chromebook Go 14", LTE, 32GB, Silver (Verizon) Chromebooks - XE345XDA-LA1VZ | Samsung US



AA cellmapper.net
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T-Mobile

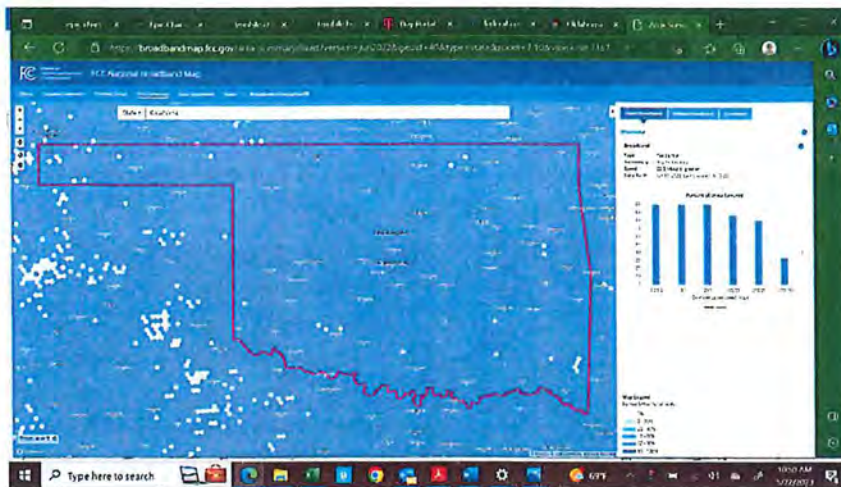


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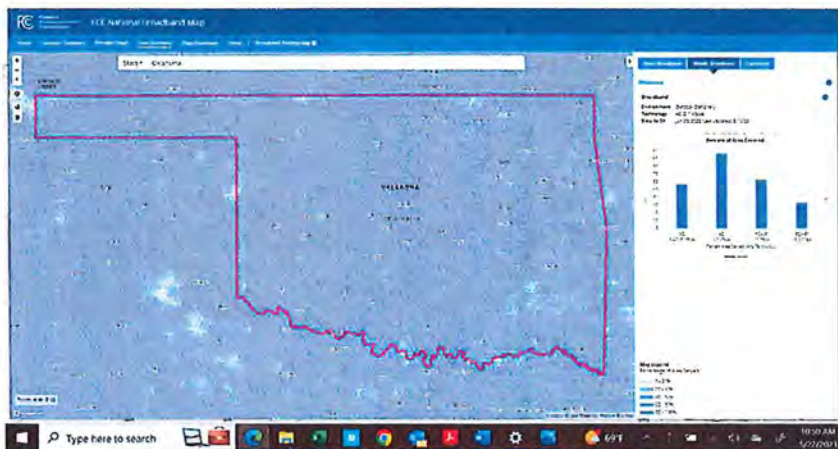


Student technological fees will be applied to the technology needs of the school. Supplied equipment will be configured, imaged, and have required software needed to assure that students are able to fully participate in the educational program in a safe and productive way.

Students and families must have regular, reliable access to the internet for successful participation in the school. As of December 2020, the Federal Communications Commission estimated that approximately 100% of Oklahoma residences had broadband Internet or 80-100% had mobile internet access of 25 Mbps or greater with at least a choice of two providers. [Federal Communications Commission, 2023](#)



Area Summary - Fixed | FCC National Broadband Map



Area Summary - Mobile | FCC National Broadband Map

While not required, it is helpful if the parent/guardian of the student has a device separate from the student computer to check email and to check parent accessible reports and information within the SISCVS platform. This device could be a smartphone, an iPad, a Chromebook, laptop, etc. If the parent/guardian does not have his/her own device, the school-issued Chromebook can be used by the parent/guardian to check email and SISCVS when the student is not engaged in schoolwork. Acceptable use guidelines apply to all who use the equipment and access the platform.

St. Isidore of Seville Catholic Virtual School Administration will contract with and secure competent IT Support and Services including acquisition of appropriate technical devices, programs, and infrastructure support systems. They will seek and secure competitive pricing and centralized purchase discounts for computers, monitors, printers, software and other peripherals ("Computer Equipment") for St. Isidore of Seville Catholic Virtual School. Related services include:

- Provide loaned student laptop computers with internet access(Chromebooks).
- Provide repair and replacement of student computers.

- Carry out imaging or reimaging of student computers.
- Carry out reclamation of student computers.

System Availability and Reliability

The SISCVS system is available to students 7 days a week/24 hours per day during the school year. The SISCVS platform consists of Canvas by Instructure, a platform with a promised 99.9% uptime combined with curriculum delivered through the Learning Management (LMS) platform. The SISCVS platform has experienced 0.06% downtime in total for an uptime of 99.94%. Canvas by Instructure is a multi-tier, service-oriented architecture managed as a SaaS platform by the commercial vendor in a fault tolerant Amazon Web Service infrastructure, ensuring maximum security and founded on the guidance provided by International Organization for Standardization's (ISO) 27000, NIST's CyberSecurity Framework, AICPA's Trust Services Principles and Criteria, and SANS' CIS Critical Security Controls.

System Backup

All student data and documents are stored in a cloud-based software as a service through both Google and Canvas. All systems are redundant and FERPA compliant. All work product data is stored in the cloud and backed up on a regular basis. Systems and tools leveraged by the products secured for this purpose include:

- Microsoft
- O365 Backup as a Service
- Axcient's X360 Cloud platform
- Monthly system administration
- Daily verification of backup summary
- Weekly backup audits
- Alerting and notification to failed backups
- Data recovery, per requests
- Google
- Backupify

In addition to backup systems, other security protocols are leveraged such as:

- Microsoft Advanced Threat Protection
- Microsoft Intune to preserve hardware/software configuration standards (Windows Laptops)
- Google G-Suite policy lockdown to preserve hardware/software configuration standards (Chromebooks)
- GoGuardian for activity tracking and content filtering (Chromebooks)
- Sophos Anti-Virus
- Multi-Factor Authentication (MFA) to secure all Microsoft account access

Description of system accessibility

The Canvas LMS platform was built using the most modern HTML and CSS technologies, and strives for WCAG 2.1 Level A/AA and Section 508 of the Rehabilitation Act conformance. The latest Canvas LMS Accessibility Conformance Report is [available at this link](#).

Budget Adjustments- See budget documents in Section 13: Appendix H

Additional Detail on Computer Fee Calculation					
Enrollments	500	500	1000	1250	1500
Fee Per Computer, Chromebook Go includes data plan with T-Mobile, AT&T, Verizon-2 year	425	425	425	425	425
Gross Computer Fees	212500	0	0	0	0
Churn Rate	15%	15%	15%	15%	15%
Churn Count	75	75	150	187	225
Churn Computer Fees	31875	31875	63750	79475	95625
Retention Rate	75%	75%	75%	75%	75%
Prior Year Retained Students	0	375	750	937	1125
New Students	0	125	250	313	375
New Student Computer Fees		\$3125	\$106,250	\$133,025	\$159,375
Faculty Laptops with applications- Lenovo, with dock, monitor: 25	\$0,000				
Total Device Cost	\$294,375	\$85,000.0	\$170,000	\$212,500	\$255,000
Student Usage Device Management- Go Guardian. \$10.50 device	\$5,250	\$5,250.0	\$10,500	\$13,125	\$15,750
100 Hot spots for additional internet access as needed \$150 min or less- 25 for teachers/staff and 75 available for					
Total Technology costs for Student Devices	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200
	\$309,825	\$100,450	\$190,700	\$235,825	\$280,961

Ready Accessibility: Investigate

... Funding Support 75% ARCH OKC Fee Schedule Start Up and 5 YR Budget

Type here to search

Start Up and 5 Yr. Budget specific to devices

General Ed Instructional Program	Student Testing and Assessment	\$0	\$75,000	\$75,000	\$238,813	\$278,232	\$422,813	
	School Extracurricular Activities	\$0	\$87,500	\$87,500	\$119,437	\$164,124	\$231,404	Academic field trips and graduation activities for
	Student Internet Access Hardware	\$0	\$19,000	\$19,000	\$32,042	\$51,638	\$76,273	
	Curriculum & Materials, ILLC/V Systems, and Instructional Support Services	\$0	\$618,000	\$618,000	\$1,818,900	\$2,600,000	\$3,230,000	See attached price list for costs
	Student Technology Assistance Services	\$0	\$130,000	\$130,000	\$300,000	\$379,000	\$430,000	See attached price list for costs
	Student Computers & Software	\$0	\$109,822	\$109,822	\$190,700	\$235,822	\$235,000	See attached price list for costs (Assumptions explained below)
	Staff Training PD (Teacher)	\$0	\$8,248	\$13,148	\$20,248	\$28,123	\$32,847	
Explosive Instructional Program		\$0	\$12,167	\$1,974,894	\$2,372,887	\$2,782,842	\$4,681,427	
Special Ed Instructional Program	Brain Training (Tread & Administration)	\$0	\$25,000	\$25,791	\$26,546	\$27,294	\$28,187	
	IEP Management Software	\$0	\$2,500	\$2,851	\$2,857	\$2,890	\$2,780	
		\$0	\$2,500	\$2,851	\$2,857	\$2,890	\$2,780	

Start Up and 5 YR Budget Start Up and 5 YR Budget- 75% Start Up and YR 1 Budget


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73°F

Start Up and 5 Yr. Budget, Inclusion in the budget document

	Additional Detail on Computer Fee Calculation					
120						
121						
	Enrollments	375	375	750	937	1125
122						
	Fee Per Computer, Chromebook Go includes data plan with T-Mobile, AT&T, Verizon-2 year contracts	425	425	425	425	425
123						
124	Gross Computer Fees	\$159,375	\$0	\$0	\$0	\$0
125	Churn Rate	15%	15%	15%	15%	15%
126	Churn Count	56	56	113	141	169
127	Churn Computer Fees	\$23,800	\$23,800	\$48,025	\$59,925	\$71,825
128	Retention Rate	75%	75%	75%	75%	75%
129	Prior Year Retained Students	0	375	750	937	1125
130	New Students	0	125	250	313	375
131	New Student Computer Fees	0	\$33,125.00	\$106,250	\$133,025	\$159,375
132	Faculty Laptop Fees with	\$50,000.00	0	\$0	\$0	\$0
133	Total Computer Fees	\$233,175	\$76,925.0	\$154,275	\$192,950	\$231,200
	Student Usage Device Management-Go Guardian, \$10.50/device	\$3,938	\$3,938	\$7,875	\$9,849	\$11,813
134						
135	100 Hot spots for additional internet access as needed \$8.50/mo or less	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200
136	Total Technology costs for Student Devices	\$247,313	\$91,063	\$172,350	\$212,999	\$253,213
137						


ARCH OKC Fee Schedule	Start Up and 5 YR Budget	Start Up and 5 YR Budget- 75%
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Ready  Accessibility: Investigate

Start Up and 5 Yr. 75% Budget Specific to devices

	A	B	C	D	E	F	G	H	I
29		School Extracurricular Activities	\$0	\$10,000	\$10,000	\$10,333	\$104,120	\$84,373	Academic field trips and graduation activities for
30		Student Internet Access Hardware	\$0	\$40,000	\$40,000	\$41,200	\$24,616	\$43,709	Academic field trips and graduation activities for
31		Curriculum & Materials, SISCVS System, and Instructional Support Services	\$0	\$487,500	\$487,500	\$485,000	\$2,600,000	\$1,910,000	See attached price list for costs
32		Student Technology Assistance Services	\$0	\$112,500	\$112,500	\$225,000	\$281,100	\$337,500	See attached price list for costs
33		Student Computers & Software	\$0	\$247,313	\$91,643	\$172,316	\$213,999	\$253,213	See attached price list for costs (Assumption explanation below*)
34		Staff Training PD (Teachers)	\$0	\$6,348	\$6,348	\$20,349	\$28,123	\$35,942	
35		Regular Instructional Program	\$0	\$903,461	\$877,613	\$1,451,623	\$3,669,324	\$2,518,043	
36		Special Ed Instructional Program							
37		State Testing (Travel & Administration)	\$0	\$25,000	\$25,761	\$26,514	\$37,354	\$18,187	
38		IEP Management Software	\$0	\$2,500	\$2,143	\$2,823	\$5,692	\$2,760	
39		Alternative Curriculum	\$0	\$1,200	\$1,200	\$1,733	\$5,139	\$6,647	
40		Assistive Technology	\$0	\$24,279	\$24,279	\$71,602	\$103,432	\$133,761	
41		Start Up and 5 YR Budget	Start Up and 5 YR Budget- 75%	Start Up and YR 1 Budget	(2)	:	4		

...	Start Up and 5 YR Budget	Start Up and 5 YR Budget- 75%	Start Up and YR 1 Budget	⊕	⏪		⏩
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Ready  Accessibility: Investigate

Start Up and 5 Yr. 75%- Inclusion in the budget document

32		Extracurricular Activities	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$37,800
33		Student Printers	-	-	-	-	-	-	-	-	-	-	-	\$0
34		Student Internet Access Hardware	\$4,167	\$4,167	\$4,167	\$4,167	\$4,167	\$4,167	\$4,167	\$4,167	\$4,167	\$4,167	\$4,167	\$50,004
35		Curriculum & Materials, SACS/CAS System, and International Support Services	-	-	\$2,500	\$2,500	\$2,500	-	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500	\$659,000
36		Student Technology Assistance Services	\$6,375	\$6,375	\$6,375	\$6,375	\$6,375	\$6,375	\$6,375	\$6,375	\$6,375	\$6,375	\$6,375	\$160,000
37		Student Computers & Software	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$319,815
38	Staff Training PD (Teachers)		\$629	\$29	\$29	\$29	\$29	\$29	\$29	\$29	\$29	\$29	\$29	\$6,318
39	Regular Instructional Program		\$39,815	\$39,815	\$71,815	\$71,815	\$98,248	\$39,815	\$39,815	\$71,815	\$67,745	\$89,245	\$67,745	\$432,815
40	Special Ed Instructional Program													\$1,278,877
41		State Testing (Error & Administration)	-	-	-	-	6,250	-	-	-	6,250	6,250	6,250	\$75,000
42		RFP Management Software	-	2,500	-	-	-	-	-	-	-	-	-	\$2,500
43		Alternative Curriculum	-	-	883	-	-	-	-	-	683	-	-	\$1,200
44	Start Up and 5 YR Budget	Start Up and 5 YR Budget- 75%	Start Up and YR 1 Budget	(+)	:	4								

4	...	Start Up and 5 YR Budget	Start Up and 5 YR Budget- 75%	Start Up and YR 1 Budget	(+)	:	4
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Ready Accessibility: Investigate



Start Up and Yr. Budget by Month

While not required, it is helpful if the parent/guardian of the student has a device separate from the student computer to check email and to check parent accessible reports and information within the SISCVS platform. This device could be a smartphone, an iPad, a Chromebook, laptop, etc. If the parent/guardian does not have his/her own device, the school-issued Chromebook can be used by the parent/guardian to check email and SISCVS when the student is not engaged in schoolwork. Acceptable use guidelines apply to all who use the equipment and access the platform.

St. Isidore of Seville Catholic Virtual School Administration will contract with and secure competent IT Support and Services including acquisition of appropriate technical devices, programs, and infrastructure support systems. They will seek and secure competitive pricing and centralized purchase discounts for computers, monitors, printers, software and other peripherals ("Computer Equipment") for St. Isidore of Seville Catholic Virtual School. Related services include:

- Provide loaned student laptop computers with internet access(Chromebooks).
- Provide repair and replacement of student computers.
- Carry out imaging or reimaging of student computers.
- Carry out reclamation of student computers.

System Availability and Reliability

The SISCVS system is available to students 7 days a week/24 hours per day during the school year. The SISCVS platform consists of Canvas by Instructure, a platform with a promised 99.9% uptime combined with curriculum delivered through the Learning Management (LMS) platform. The SISCVS platform has experienced 0.06% downtime in total for an uptime of 99.94%. Canvas by Instructure is a multi-tier, service-oriented architecture managed as a SaaS platform by the commercial vendor in a fault tolerant Amazon Web Service infrastructure, ensuring maximum security and founded on the guidance provided by International Organization for Standardization's (ISO) 27000, NIST's Cyber Security Framework, AICPA's Trust Services Principles and Criteria, and SANS' CIS Critical Security Controls.

System Backup

All student data and documents are stored in a cloud-based software as a service through both Google and Canvas. All systems are redundant and FERPA compliant. All work product data is stored in the cloud and backed up on a regular basis. Systems and tools leveraged by the products secured for this purpose include:

- Microsoft
- O365 Backup as a Service
- Axcient's X360 Cloud platform
- Monthly system administration
- Daily verification of backup summary
- Weekly backup audits
- Alerting and notification to failed backups
- Data recovery, per requests
- Google
- Backupify

In addition to backup systems, other security protocols are leveraged such as:

- Microsoft Advanced Threat Protection
- Microsoft Intune to preserve hardware/software configuration standards (Windows Laptops)
- Google G-Suite policy lockdown to preserve hardware/software configuration standards (Chromebooks)
- GoGuardian for activity tracking and content filtering (Chromebooks)
- Meraki Content Filtering to preserve safe Internet activity (School Location Only)
- Sophos Anti-Virus
- Multi-Factor Authentication (MFA) to secure all Microsoft account access

Description of system accessibility

The Canvas LMS platform was built using the most modern HTML and CSS technologies, and strives for WCAG 2.1 Level A/AA and Section 508 of the Rehabilitation Act conformance. The latest Canvas LMS Accessibility Conformance Report is [available at this link](#).

Description of student records and data management

St. Isidore of Seville Catholic Virtual School recognizes the need to protect the confidentiality of personally identifiable information in the education records of children. St. Isidore of Seville Catholic Virtual School is prepared to ensure the privacy rights of eligible children in the collection, maintenance, release, and destruction of records. Parents/guardians of students eligible for special education services have rights regarding the protection of the confidentiality of any personally identifiable information collected, used, or maintained. St. Isidore of Seville Catholic Virtual School will follow federal and state provisions including the following:

- The Family Educational and Privacy Rights Act (FERPA), 20 USC § 1232g and 34 CFR Part 99 (regarding student educational records);
- The Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1400 et. seq. and 34 CFR Part 300 (protecting the confidentiality of personally identifying information contained in student records of students with disabilities)

Student Data Maintenance of Records / Safeguards

St. Isidore of Seville Catholic Virtual School will provide notice to the parent/guardians to fully inform of the policies and procedures to maintain confidentiality of personally identifiable information at the collection, storage, disclosure, and destruction stages. The Special Education Administrator will be responsible for ensuring that the education records, confidentiality rules, and education records policy for eligible children are administered and enforced. The Special Education Administrator will ensure that all of the St. Isidore of Seville Catholic Virtual School faculty and subcontracted agency employees, who collect or use personally identifiable information, receive in-service training regarding the implementation of this policy. In-servicing will consist of providing, at the least, yearly presentation of the information to staff and subcontractors. St. Isidore of Seville Catholic Virtual School will maintain, for public inspection, a current listing of the names and positions of those employees within the agency who may have access to personally identifiable information.

Records Access

St. Isidore of Seville Catholic Virtual School will permit parents of students eligible for special education to inspect and review, during school business hours, any educational records relating to the student which are collected, maintained, or used by the district or other public agency under this chapter. St. Isidore of Seville Catholic Virtual School will comply with a request promptly and before any meeting regarding an individualized education program or hearing or resolution session relating to the identification, evaluation, educational placement of the student or provision of FAPE to the student, including disciplinary proceedings. St. Isidore of Seville Catholic Virtual School will presume that a parent has authority to inspect and review records relating to his or her student unless (the school, local) school district or other public agency has been advised that the parent does not have the authority under applicable state law governing such matters as guardianship, separation, and divorce.

Record of Access

St. Isidore of Seville Catholic Virtual School will keep a record of parties obtaining access to educational records collected, maintained, or used under this chapter including the name of the party, the date access was given, and the purpose for which the party is authorized to use the records. The agency is not required to keep a record of access by parents, and authorized employees with a legitimate educational interest in the records.

Destruction of Information

St. Isidore of Seville Catholic Virtual School will operate in accordance with FERPA and its regulations. Student information will be destroyed at the request of the parents/guardians when the information is no longer needed at St. Isidore of Seville Catholic Virtual School to provide educational services to the child. However, a permanent record of a child's name, address and telephone number, grades, attendance record, classes attended, grade level completed, and year completed may be maintained without time limitation.

Student Recruitment Policies and Procedures (including lottery procedures)

Each year, St. Isidore of Seville Catholic Virtual School will announce its open enrollment period for any Oklahoma parents or guardians who would like to submit an application for their student(s). These outreach activities will be conducted statewide via multiple marketing pathways. If the number of applicants exceeds the capacity of the school or grade level, St. Isidore of Seville Catholic Virtual School will conduct a random selection lottery after first granting enrollment preferences for prior year students and then for a sibling of a current student enrolled in the school. As a statewide school, St. Isidore of Seville Catholic Virtual School will admit any and all students who reside in the state, provided there is capacity to serve that student's grade level per the annual enrollment goals for each year. All students are welcome, those of different faiths or no faith. Admission assumes the student and family willingness to adhere with respect to the beliefs, expectations, policies, and procedures of the school as presented in the handbook.

Enrollment Process:

1. A parent or legal guardian should complete the digital or paper Application for Admission to St. Isidore of Seville Catholic Virtual School to be considered in the lottery process.

2. Open enrollment occurs each year in February and March of the first year and January and February in subsequent years.
3. Applications submitted up to the announced enrollment decision date will be reviewed by a designee for completeness, legal residence, and age/grade of student. Incomplete application forms will not be considered.
4. A child must be five (5) years of age on or before September 1 in the school year enrollment is being applied for kindergarten.
5. Notification of the lottery will serve as public notice of an official meeting, even if no action(s) are anticipated to be taken by members of the Board at the time of the lottery.
6. If an enrollment lottery is required, it will be conducted based on the previously described guidelines.
7. Once the lottery is complete, applicants will be notified by the designee of their status.
8. Digital registration will be made accessible to applicants who received enrollment offers in the lottery process. If a family requires a paper enrollment form, they will be provided one. Families will have two weeks to complete the registration accurately and thoroughly, including the submission of all compliance related documentation.
9. Registrations that are not completed within the designated time, or applicants that cannot produce appropriate priority information, will forfeit enrollment offers.
10. Seat placement determinations are made following receipt of the completed, compliant registration.
11. If the number of lottery applications does NOT exceed seats available, parents/guardians that have submitted a lottery application have 1 week to complete registration. At the end of that week, the registration opens to the public and school enrolls until capacity.
12. As openings occur post lottery, applicants on the grade level waitlist will be contacted in the established order. Registration process access will be provided. Completion of the registration process is expected in two weeks order to prompt a seat placement determination.
13. St. Isidore of Seville Catholic Virtual School will continue to enroll students using this process until the established enrollment number is met and maintained.
14. A provision shall be made for the children with a sibling enrolled at St. Isidore of Seville Catholic Virtual School. If a child must be placed on a waitlist due to capacity issues, the child with an enrolled sibling will be granted priority.

Waitlist:

The waitlist is the ordered list of applicant students without enrollment offers. The waitlist for each school year is initiated through the lottery process. Once all available enrollment opportunities are offered, the remaining applicant students will be added to the waitlist in the order drawn. The waitlist remains active through the academic year. The waitlist for a given year is not carried over to the next school year. A new enrollment application is required for each school year for which a student is seeking a new enrollment.

Students who wish to transfer to St. Isidore of Seville Catholic Virtual School mid-school year may do so if the school has capacity to serve that student in that grade level. Otherwise, the student will be added to a waitlist for that grade level. The most successful retention plan begins by succeeding with the students that are already enrolled. By providing a high-quality, personalized educational program, sustaining relationships and connection, and meeting the needs of all students, St. Isidore of Seville Catholic Virtual School will create an offering that will ensure students want to continue their success in our virtual seats. St. Isidore of Seville Catholic Virtual School will track in-year and year-over-year

withdrawn students. This data is not only required per Oklahoma charter school law, but it also provides the school with valuable information each year on how to better serve students and their families. Academically successful students tend to want to stay in the school they are currently enrolled in. The SISCVS Learning Management System provides a tremendous amount of data on where students spend their time in their courses and this information is valuable to get students unstuck in their learning process. We believe this, coupled with talented teachers specifically trained to serve students in this educational model, provides the best opportunity for students to be successful.

Admission/Enrollment Policies and Procedures

- Including minimum and maximum enrollment planned per year for the term of the charter contract
- Including proposed calendar and sample daily schedule as applicable to online learning at proposed school. Additional time has been added to the daily schedule to account for the religion/theology classes taught as a requirement of the school.

Enrollment Charts are included as **Appendix D**. The St. Isidore of Seville Catholic Virtual School proposed school calendar is included as **Appendix E**.

Attendance Policies and Procedures

The St. Isidore of Seville Virtual Catholic School will follow state policy guidelines referenced below established from 70 OK Stat § 70- 3-145.8 (2020)

1. A student who attends a virtual charter school shall be considered in attendance for a quarter if the student:
 - completes instructional activities on no less than ninety percent (90%) of the days within the quarter,
 - is on pace for on-time completion of the course as defined by the governing board of the virtual charter school, or
 - completes no less than forty instructional activities within the quarter of the academic year.
2. For a student who does not meet any of the criteria set forth in paragraph 1 of this subsection, the amount of attendance recorded shall be the greater of:
 - the number of school days during which the student completed the instructional activities during the quarter,
 - the number of school days proportional to the percentage of the course that has been completed, or
 - the number of school days proportional to the percentage of the required minimum number of completed instructional activities during the quarter.
3. For the purposes of this section, "instructional activities" shall include but not be limited to online logins to curriculum or programs offered by the virtual charter school, offline activities, completed assignments, testing, face-to-face communications with virtual charter school staff or service providers or meetings with virtual charter school staff or service providers via teleconference, videoconference, email, text or phone.
4. St. Isidore Catholic Virtual School shall submit a notification to the parent or legal guardian of a student who has been withdrawn for truancy or is approaching truancy.
5. The Statewide Virtual Charter School Board may promulgate rules to implement the provisions of this section. Attendance is tracked via a combination of the following:

- a. Reports that are required to be submitted by Parents/Guardians, reports automatically generated by the school Learning Management System, and other methods as dictated by the school.
- b. A St. Isidore of Seville Virtual Catholic School student is considered in attendance when they satisfy either of the following conditions:
 - i. The student participates in at least 90% of the instructional activities offered by St. Isidore of Seville Catholic Virtual School in that school year; or
 - ii. The student is on pace for on-time completion of any course in which the student is enrolled. The school has defined on pace to mean the student is currently earning a passing grade in any course in which the student is enrolled.
- c. Instructional activities mean the following classroom-based or non-classroom-based activities that a student is expected to complete, participate in, or attend during any given school day:
 - Online logins to curriculum or programs;
 - Offline activities;
 - Completed assignments within a particular program, curriculum, or class;
 - Testing;
 - Face-to-face communications or meetings with School staff or service providers;
 - Telephone or video conferences with School staff or service providers
 - Other documented communication with School staff or service providers related to School curriculum or programs.
- d. If a student is not considered in attendance, they shall be considered absent for those hours of instructional activities offered by the School in that school year in which the student does not participate. The school will hire an Attendance Officer who will work with teachers to monitor and report student attendance and support teachers and the Principal/Director with any mandated truancy proceedings.

Promotion/Graduation Policies and Procedures

While course grades are an important component of retention and promotion decisions teachers and school leaders will be trained to utilize a multi-faceted decision-making approach, to ensure that each student's unique characteristics are considered in conjunction with all available student level data to inform retention and promotion decisions. During the Spring of each school year, teachers will create a list of students for whom retention may be necessary, based upon available data. Multiple stakeholders involved with the student will be included in the decision-making team (teachers, parents, administrators, school counselors, interventionists).

For any student who undergoes the Retention/Promotion review, the team will create an individualized plan to note what additional supports and interventions will be provided to the student in the course of the next school year to ensure continued progress towards mastery of grade level standards, regardless of whether the decision is to retain or to promote. Considerations for the retention and promotion decision process may include course grades, assessment data, student attendance, student motivation, student learning style and pace, chronological age, developmental characteristics/maturity, prior retention, student learning exceptionalities, and student transiency.

For High School level students, progress from one grade level to another will be based on credits earned. Teachers and administrators will work to ensure that all students have access to any state allowable alternative pathways to graduation, and that any existing credit flexibility and dual enrollment options are utilized. Students who experience course failure and become credit deficient will have access to additional opportunities to recoup credits via programs such as summer school or credit recovery course work. Students (and parents) are expected to regularly consult and follow course pacing guides to ensure that all assignments and assessments are completed by the established due dates. Extensions are handled at the course level teacher's discretion. Early interventions will occur by the teacher and/or school leader when students fall behind their pacing guides, not logging in to the SISCVS system or consistently failing. Contact with the parent and students will occur in various manners including electronic (email), verbal (phone/video) and in-person meetings.

The school's teachers maintain an electronic grade book within the SISCVS System that displays the student's progress. Parents and students have view only access to view grade reports itemizing each grade for students. Grades are posted and reported quarterly. Semester grades will be comprised of the average of two quarters. Final grades will be the average of the two semesters. School administration will have a final review of grades and credits earned to be sure that all credits earned are properly credited in the student's records.

Student Conduct and Discipline Policies and Procedures

In order to maximize student learning for all students, St. Isidore of Seville Catholic Virtual School will provide a virtual school environment that promotes appropriate behavior and minimizes disruptions. The Board believes that the best discipline is intrinsic and self-imposed and that students should learn to assume responsibility for their own behavior and the consequences of their actions. All students are expected to have a clear and consistent understanding of the Student Code of Conduct and comply with all School policies and procedures.

The Code of Conduct requires students to:

- conform to reasonable standards of socially acceptable behavior; including appropriate digital citizenship for themselves and others
- respect the person and property of others;
- respect the rights of others;
- preserve the degree of order necessary to the educational program in which they are engaged; and
- comply with the requests of School administrators, teachers, and staff.

The Code of Conduct designates sanctions for student noncompliance with the Code which shall:

- relate in kind and degree to the noncompliance;
- help the student learn to take responsibility for their actions; and
- be directed, where possible, to reduce the effects of any harm which may have been caused by the student's misconduct.

Prior to being enrolled and as a condition of enrollment, parents and students must:

- Acknowledge receipt of the Code of Conduct; and
- Agree to comply with all expectations and procedures contained therein.

St. Isidore of Seville Catholic Virtual School shall not discriminate on the basis of a protected class, including but not limited to race, color, national origin, age, religion, disability that can be served by virtual learning, or biological sex in its discipline policy and practices.

The Board shall adopt procedures consistent with this policy.

1) To date, the Board has not formally adopted a Discipline Policy. However, we anticipate that the Board will adopt this or a similar policy no later than the end of the year prior to opening in the Fall of 2024.

2) The Board will formally draft a Code of Conduct that will include, but not be limited to an Attendance Policy, Engagement Policy, and general student conduct expectations (e.g., academic dishonesty, bullying and cyberbullying, acceptable use, internet use, etc.), as well as sanctions for noncompliance.

Description of School Safety and Emergency/Crisis Response Plan

- A. School safety is a top priority. Since St. Isidore of Seville Catholic Virtual School will not be hosting students in a facility, most of the concerns associated with emergency plans in a traditional setting will not apply to virtual settings. Administration is aware of the importance of online safety and proper digital citizenship and will put into place the appropriate training for all faculty, parents, and students.
- B. Administration is aware of the importance of the safety of students' records, and already has plans in place to ensure backups of critical documents and communication to families should there be a disruption in network services.
- C. Student Services team members who support the student population include Success Coaches and School Counselors. This team is responsible for providing holistic, wrap-around support to all students to promote positive social emotional and academic outcomes. Particular attention is devoted to providing Tier I support to all students through designing and facilitating orientation and onboarding efforts.
- D. Besides helping students have a successful start to the school year, the Success Coaches leverage data and teacher referrals to proactively identify students who are struggling to meet engagement and academic expectations. Coaches then meet with these students and their parents to identify barriers to success and create a plan to get the student successfully re-engaged in learning and back on track academically. Coaches and School Counselors partner to provide students with social emotional learning content, grade band transition support, college/career readiness programming, and graduation planning. Additionally, School Counselors provide Tier I Guidance content to all students (such as suicide awareness and prevention, cyber bullying education and prevention, coping skills, etc.) and provide further support to students in need in small groups or one on one.

Description of Parent/Family Education and Engagement Plan, Including expectations and opportunities

- A. St. Isidore of Seville Catholic Virtual School recognizes that parents/guardians are most engaged when they have meaningful opportunities to shape school programs and provide input.

- Parents/guardians will have the ability to participate in town hall type dialogue or question and answer sessions, either by grade level or as a school, with school administration periodically.
- B. Parent/guardian input will be collected through surveying multiple times per year.
 - C. The School Services Team will reach out to state and local health and family services agencies to assist families who need these services.
 - D. St. Isidore of Seville Catholic Virtual School Board of Directors and Principal/Director will work closely to develop strategic partnerships, and to define what those strategic partnerships will involve.
 - E. The school may seek partnerships with higher education institutions for teacher recruitment, and collaboration on educational research. The school may seek partnerships with high quality youth organizations.
 - F. One means of stakeholder involvement is participation in the Board's regular meetings. When a board meeting notice is posted, St. Isidore of Seville Catholic Virtual School draft agenda will be included so that stakeholders – as well as the public – can attend and offer public comment either generally or on a specific agenda item. The Board of Directors may also seek stakeholder comments on proposed board initiatives via a request for written comment or an invitation to provide oral comment at a board or committee meeting. Although not yet formally addressed by the St. Isidore of Seville Catholic Virtual School Board of Directors, the Board of Directors may choose to include stakeholders on standing or ad hoc board committees. The Board is committed to continuously evaluating its efforts to promote stakeholder involvement and ensuring that stakeholders have a voice.
 - G. While St. Isidore of Seville Catholic Virtual School model is based on a virtual learning experience, St. Isidore of Seville Catholic Virtual School fully acknowledges that in-person engagement is essential for reaching students and families who may not have access to online services and/or digital media. After approval, St. Isidore of Seville Catholic Virtual School will hold frequent, publicly available community meetings, information sessions throughout the year, as well as using the email list serve to continue to communicate news, progress, and school achievements to interested parties in the community. Our goal is to create a network of regional support where families can support one another, identify local tutoring and mentoring opportunities, and feel affiliated with a school community.
 - H. Lastly, an integral part of preparing students for success in career and college endeavors is to build relationships and foster early opportunities for the transition after high school. Studies have shown that connection with a college and participation in dual enrollment programs increase the likelihood that students will not only graduate from high school but enroll and successfully complete undergrad and graduate programs in college (Source: [NACEP: Research on Dual and Concurrent Enrollment](#)) In order to cement the opportunity for future success, St. Isidore of Seville Catholic Virtual School will seek collaborations with available local college and university campuses within Oklahoma.

Plans for providing significant operational or ancillary services

St. Isidore of Seville Catholic Virtual School will provide, or contract out for, significant ancillary services as needed by each student and required by federal or state law and which falls within the purview of a virtual instructional model. Consultation with the family will take place indicating what the school can do to meet the needs of the student and a Student Service Plan will be put into place. Should a family decide that their child is needing services that cannot be delivered successfully through a virtual model the family will be referred to the local LEA to determine if it is a better fit.

GOVERNANCE

Governing body

The current five-member School Board all reside in Oklahoma, and most are near the Oklahoma City, where the administration office will be located and Board meetings will be conducted. Each current member of the Board brings a unique set of personal experiences and professional expertise that will help ensure the success of St. Isidore of Seville Catholic Virtual School. Five-ten board members will be added once the application is accepted and the school is slated to open, remaining positions will be members of the community, some stakeholders, some with needed business acumen and experience.

Governing body membership, including evidence of Oklahoma residency

Name: Lara Schuler, Treasurer
Address: 7501 NW Expressway, OKC 73132
E: lschuler@archokc.org
P: 405-709-2701

P: [\(888\) 514.1135](tel:(888)514.1135)

Name: Michael Scaperlanda, Chairperson
Address: 7501 NW Expressway, OKC 73132
E: mscaperlanda@archokc.org

Name: David Dean, Board Member
Address: 300 E 91st St, Broken Arrow, OK 74012
E: David.dean@dioceseoftulsa.org
P: (918) 294-1904

Name: Brett Farley, Board Member
Address: 208 NW 13th, Ste 12 Oklahoma City, OK 73103
E: brett@okcatholic.org

Name: Deacon Garlick, Secretary
Address: 300 E 91st St, Broken Arrow, OK 74012
E: dcn.harrison.garlick@dioceseoftulsa.org
P: (918) 294-1904

Roles and responsibilities

St. Isidore of Seville Catholic Virtual School believes that a quality school must be governed by individuals who are responsible stewards of public funding while upholding the charter's mission. The Governing Board of Directors will be professional and ethical at all times, supporting the school's mission and vision. They will provide oversight for the operations, leadership, and policies of the school. Specifically, their duties will include responsibility for ensuring legal compliance, evaluating the school leader, setting goals for measuring academic success, allocating resources appropriately and approving an annual budget, and approving school policies and procedures. As an initial matter, the Board of Directors has assessed the St. Isidore of Seville Catholic Virtual School program and services to ensure alignment with its priorities. It is negotiating the management agreement so that the Board of Directors, St. Isidore of Seville Catholic Virtual School, the Archdiocese of Oklahoma City, and Diocese of Tulsa have a clear understanding of each other's responsibilities as supporters of the school. The St. Isidore of Seville Catholic Virtual School will contract with an independent School Treasurer from a firm approved by the Oklahoma Department of Education. The Board of Directors will hold all responsible parties accountable for its students' academic results, including the administration, the teachers, the parents/guardians. The Archdiocese of Oklahoma City Department of Catholic Education is responsible

for initiating the support for St. Isidore of Seville Catholic Virtual School under the Board of Directors direction and pursuant to the terms of the services agreement negotiated by the parties until the school is operational and on solid financial footing. The Department of Catholic Education, as an entity within the Archdiocese of Oklahoma City, is a non-profit organization.

As cited in 70 O.S. § 5-110 (OSCN 2022), the St. Isidore of Seville Catholic Virtual School Board is committed to being knowledgeable about laws and regulations governing the school and will seek guidance from board counsel and participate in the required training requirements within 15 months of appointment/election and annually to remain in good standing. Primary training will occur within the first three years of school operations in the areas of Ethics, Open Meetings/Records and Finance by the Oklahoma State School Board Association.

Proposed Governing By-laws

Please see **Appendix F** -

Meeting schedule (Minimum of quarterly governing body meetings)

The current five-member Board of Directors resides in or close to Oklahoma City or Tulsa. Throughout the year, meetings will take place four or more times per year. Meetings may take place virtually or in person in either Oklahoma City or Tulsa with some meetings based on member availability and agenda topics. Prior to the opening of the school, the Board of Directors will identify and recruit additional Board members in line with its bylaws.

CAPACITY FOR GOVERNANCE

1. Support of the charter contract

The Board of Directors is fully aware of their fiduciary responsibilities and oversight for St. Isidore of Seville Catholic Virtual School. Upon the application being approved, the Board of Directors will assign education management services to be provided initially by the Archdiocese of Oklahoma City, a non-profit organization, with the option to transfer to the Diocese of Tulsa or an outside vendor if needed in future years. This function of the board is contained within the bylaws.

St. Isidore of Seville Catholic Virtual Board of Directors looks forward to a collaborative and transparent relationship with the Statewide Virtual Charter School Board. It will ensure staff will fulfill all pre-opening requirements so that the school is in a position to be successful upon opening. Once operating, the Principal/Director will provide a monthly report on the academic progress of students and any required operational matters. The Board of Directors will work with the School Treasurer to review the school's monthly and budget-to-actual financial position, among other key finance metrics.

2. Organizational accountability

St. Isidore of Seville Catholic Virtual School Board of Directors is committed to being knowledgeable about laws and regulations governing the school and will seek guidance from board counsel and participate in annual training as required by Oklahoma state law. They are prioritizing diversity within their members, transparency to their stakeholders, and accountability to the Oklahoma State Virtual Charter Board as their authorizer. They will also seek to avoid conflicts of interests and keep students'

academic success as a foremost priority. Like all charter schools in the state, the St. Isidore of Seville Catholic Virtual School Board understands that the school may be issued a school report card against state and federal accountability indicators and will also be accountable to the authorizer using the Performance Framework. Annually, the school leadership, the student education support team, and the Board will review state testing results for ways to improve student learning resulting in a board approved school improvement plan for the following school year.

The Principal/Director will provide monthly reports to the Board of Directors on student academic progress and operations. The Board of Directors with guidance from the Archdiocese of Oklahoma City will provide a compliance oversight role to ensure state and authorizer data reporting is done accurately and on time. The St. Isidore of Seville Catholic Virtual School Board of Directors will adhere to the authorizer's requirements for data and evidence collection, site visits, school website compliance checks, annual reviews, and performance reports. Sometime after the school's first year of operation, the school will seek external accreditation, as well as cooperate with the approved accreditation entity in the state of Oklahoma.

3. Financial stewardship

The St. Isidore of Seville Catholic Virtual School Board of Directors understands its responsibility to adhere to all state and federal laws and regulations when managing school's finances. The St. Isidore of Seville Catholic Virtual School Board of Directors has amended their by-laws to reflect their roles and responsibilities related to school finance. Finally, the St. Isidore of Seville Catholic Virtual School Board of Directors understands that there are specific indicators the school will be held accountable for in the SVCSB's Performance Framework including:

- Audit findings
- Quarterly financial reports
- Record of financial reporting compliance

4. Academic oversight

The St. Isidore of Seville Catholic Virtual School Board of Directors is committed to academic excellence and will have an unwavering commitment to achieving the school academic goals. Each year, the St. Isidore of Seville Catholic Virtual School Board of Directors, in collaboration with the Principal/ Director and administrative team will create a school improvement plan based on the annual data analysis of state assessments, review of the year's benchmark assessments, and feedback from the School Improvement Team. The Continuous Improvement Plan (CIP) will contain the required components as defined by §70-5-117.4., including strategies for improving instruction. In a virtual school, that often includes discussions on the content of synchronous instructional sessions, strategies to improve student engagement, and the use of supplemental curriculum to support student learning gaps. The Board of Directors will approve the CIP and will review progress towards the academic goals at its monthly board meetings.

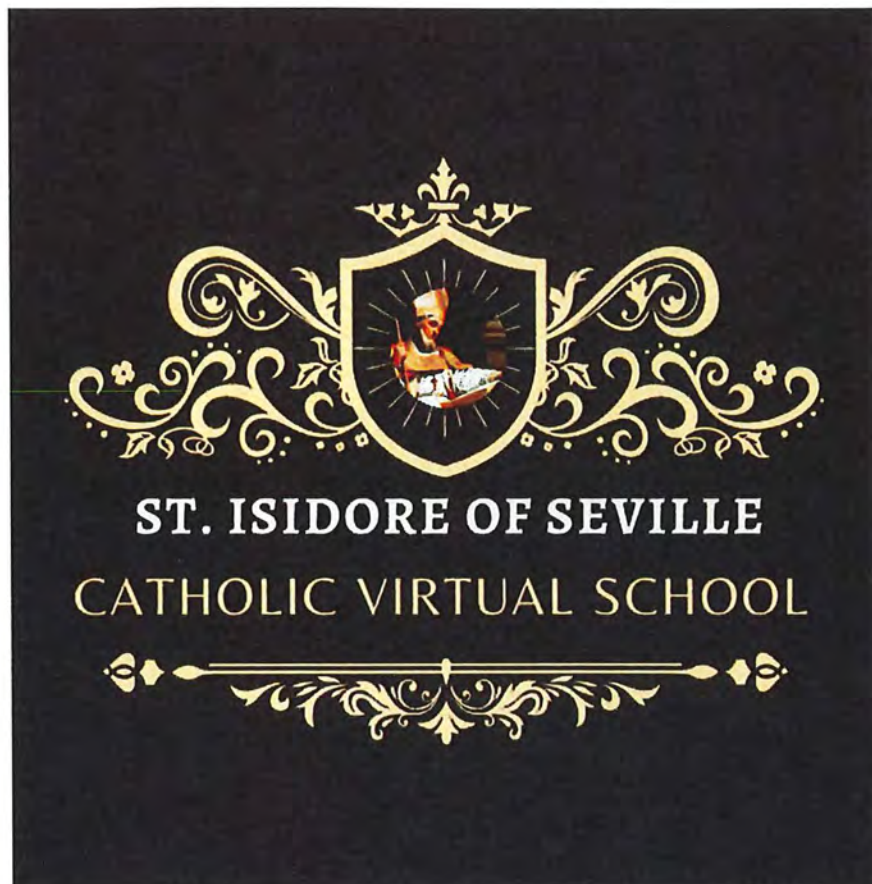
Revisions, May 25, 2023:

Board of Directors. All of the initial directors, including Brett Farley, are listed on page 3 of the Certificate of Incorporation, which was filed with Oklahoma's Office of Secretary of State on January 27, 2023.

Voting Rights and Governance. Non-profit corporations can be set up to be governed solely by a self-perpetuating board or by members who delegate most powers to a self-perpetuating board. St. Isidore is a member non-profit with the Archbishop of Oklahoma City and the Bishop of Tulsa constituting the two members. Neither bishop serves as a member of the Board of Directors. The Board of Directors is tasked with managing and directing "the business and affairs of the School," Bylaws, Article IV, Section 4.1, subject to the reserve powers of the members. Ibid. at Section 3.2.

Conflicting Terms. The Application has been amended to replace the phrase "Board of Trustees" with "Board of Directors" to make the Application consistent with the Bylaws and Certificate of Incorporation.

Bishops, the Board, and the EMO. To clarify, a) the bishops are not Members of the Board of Directors of St. Isidore, and b) the EMO that the School will contract with is a non-profit. See 2022 Official Catholic Directory, page 815 listing the Archdiocese's Office of Catholic Education. (attached). The Catholic Church, under the auspices of the United States Conference of Catholic Bishops, receives a group tax exempt ruling from the IRS stating that all organizations listed in the Official Catholic Directory are non-profit tax exempt organizations. See IRS Determination Letter dated August 24, 2022 (attached).



Section 8: Financial Management

Financial Management.

Description of the roles/responsibilities of the treasurer, financial officers

The St. Isidore of Seville Catholic Virtual School's ability to achieve its mission and vision depends on the effective and efficient use of resources. St. Isidore of Seville Catholic Virtual School will operate using sound fiscal management and accounting principles, as defined by state and federal laws and regulations. The school has a plan, including its choice to contract with an independent Oklahoma Treasurer and Encumbrance Clerk, to maintain financial stability for each year of operation.

The school will track revenue and expenditures using the Oklahoma Cost Accounting System and make certain school finance information is available on the school website, as required by the School District Transparency Act. As previously mentioned, the St. Isidore of Seville Catholic Virtual School Board has amended its By-laws to address its role in managing school finances including the role of the School Treasurer and Board Finance Director.

The St. Isidore of Seville Catholic Virtual School Administration will provide some support for school finance including initial budget development, the independent Oklahoma School Treasurer will oversee school finances and directly handle state fiscal reporting. The School Treasurer will work closely with the Board of Directors' Finance Director to review monthly financial reports, prior to them being presented to the full St. Isidore of Seville Catholic Virtual School Board of Directors for review and approval.

Financial Policies, including financial controls and compliance with audit requirements

All general fund receipts shall be transmitted to the School Treasurer and all disbursements shall be issued by the School Treasurer. St. Isidore of Seville Catholic Virtual School will prepare an annual budget, in the form required by the state, for the fiscal year from July 1 through June 30th. If required by law, the school will schedule a public hearing at least 45 days prior to the beginning of the budget year. According to state deadlines, the St. Isidore of Seville Catholic Virtual School board shall prepare a statement of actual income and expenditures of the school for the prior fiscal year and report that data to the State Department of Education as required by state law. The final budget may be revised by the School Board in open meeting.

St. Isidore of Seville Catholic Virtual School will employ a state approved independent auditor for the purpose of conducting an annual audit of the school each fiscal year.

The St. Isidore of Seville Catholic Virtual School Board of Directors will work closely with the School Treasurer to establish a purchasing policy that allows for the Head of School to approve minor budgeted expenditures and takes into account its agreement with educational contractors. Appropriate checks and balances will be established to insure proper internal controls.

INTERNAL CONTROL SYSTEM COMPONENTS

St. Isidore of Seville Catholic Virtual School internal control system should include five components – Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring.

Control Environment

The control environment, as established by the Board of Directors and leadership should set a control conscious tone for the School. Policies and Procedures should be readily available to all school personnel, and pertinent Policies/Procedures specifically reviewed upon hire.

Risk Assessment

An annual Risk Assessment should be performed, incorporating input from all levels of the organization.

The Risk Assessment can be integrated into the strategic planning process and should:

- Review and assess operations (i.e. internal control review), including internal control effectiveness evaluation;
- Identify significant relevant internal and external risks (at all levels) to achieving school objectives;
- Address changing economic, regulatory, and operating conditions;
- Evaluate the likelihood and possible impact of identified risks; and
- Determine what actions can be taken to minimize the risk and enhance internal controls, while following applicable laws and regulations.

Control Activities

Control activities are the policies (i.e. what should be done) and procedures (i.e. how things should be done) that help ensure that necessary actions are taken to address risks for the achievement of the school's objectives.

Control Activity Components

Internal controls rely on the principle of checks and balances and include a range of components: personnel, approvals/authorizations and verifications, reconciliations, operating performance reviews, asset security, and segregation of duties.

Donations to the School

Section 8.5 of the Bylaws provides: "The Board may accept on behalf of the School any contribution, gift, bequest, or devise for the general purposes or for any special purpose of the School. The School shall separately inventory assets purchased with private or donated funds." It is our understanding that Ms. Wilkinson suggested adding that the CFO of the School be designated as the recipient of such funds to ensure that there is no commingling of funds. The St. Isidore Board will amend the bylaws to say this, if necessary, but in our counsel's view this isn't necessary at the bylaw level but instead is a matter of operations and internal controls, which the School will have in place to ensure proper accounting.

Personnel

Personnel need to be competent and trustworthy, with clearly established lines of authority and responsibility documented in written job descriptions and procedure manuals. Organizational charts provide a visual presentation of lines of authority and periodic updates of job descriptions ensures that employees are aware of the duties they are expected to perform. Staff strengths/weaknesses should be identified, and duties assigned accordingly to develop a stronger team. Employees should be encouraged to participate in professional development activities.

Approvals/Authorizations and Verifications

- Policies, regulations, and procedures should clearly identify which individuals have authority to approve different types of transactions. Approval authority should be commensurate with the nature and significance of the transactions.
- Transactions should be authorized and executed by persons acting within the range of their authority. Authority can be delegated, but authorization should be from at least one level above. Employees should not authorize their own transactions.
- Individuals should understand what they are approving. Individuals should have firsthand knowledge of transactions being approved, or they should review supporting information to verify the propriety and validity of transactions.
- Transactions should not be returned to the initiator after approval. They should proceed directly for processing after approval by a supervisor.
- No one should sign blank forms/documents.
- Corrections or adjustments should be initialed by both the supervisor and employee.

Reconciliations

Balance sheet general ledger accounts reconciled monthly, full reconciliation at year-end.

Operating Performance Reviews

Operating performance should be reviewed periodically and evaluated for correction/improvement opportunities. As necessary, corrective actions/improvements should be implemented and sustained.

Asset Security

Physical restrictions, inventories, and reconciliations should be in place for safeguarding school assets/data. Information technology general controls (e.g., add/changed/delete access restrictions, password, patching/updating controls, etc.) should be functioning.

Segregation of Duties

As much as possible within a small school organization, an individual should not have responsibility for more than one of the three transaction components: authorization, custody, and record keeping. When the work of one employee is checked by another (i.e., authorization), and when the responsibility for custody for assets is separate from the responsibility for maintaining the records relating to those assets, there is appropriate segregation of duties. This helps detect errors in a timely manner and deter improper activities. Incompatible duties should be separated (e.g., cash receipts handling/accounts receivable posting, payroll preparation/verification, etc.) among different staff and school support members.

Information and Communication

Pertinent information must be identified, captured and communicated in a form and time frame that enables people to carry out their responsibilities. Information and transactions of value should be clearly, thoroughly, and accurately recorded and retained. Records should be maintained and controlled in accordance with the established retention period and properly disposed of in accordance with established procedures.

Effective communication must occur throughout (down, across and up) the school organization. Management should send clear messages that control responsibilities must be taken seriously.

Personnel must understand their own role in the internal control system, as well as how individual activities relate to the work of others. All personnel and support staff must have a means of communicating significant information and concerns upstream.

Monitoring

Internal control systems should be monitored – a process that assesses the quality of the system's performance over time. Ongoing monitoring occurs in the ordinary course of operations, and includes regular management and supervisory activities, and other actions personnel take in performing their duties that assess internal control system performance. Internal control deficiencies should be reported upstream, with serious matters reported immediately to leadership, and the Board of Directors as necessary based on severity. Internal control systems, the way controls are applied, personnel, and the circumstances for which the internal control system was originally designed may change over time. Thus, monitoring should include determining whether the internal control system continues to be relevant and able to address new risks and ii) making adjustments accordingly. Monitoring is essential to verify that controls are operating properly. Reconciliations, confirmations, exception reports, and data analysis (budgeted revenue/expenditures to actual, operating statistics, student performance scores, etc.) are effective monitoring tools.

Financial plan for the first five years of operation

- Start-up and five-year budgets and cash flow projections accounting for the school's anticipated enrollment, including a budget if the school only realizes a portion of the school's anticipated enrollment
- Start-up and first-year cash flow projections (Documents provided account for the school's anticipated enrollment, as well as budget if the school only realizes a portion of the school's anticipated enrollment)
- Anticipated fundraising plan

See **Appendix H** - Budget assumptions and descriptions are included in the far-right column of the budget document, with the exception of the revised minimum enrollment assumptions which are in **Appendix D**

The Board will have a balanced budget in all five years of operation and will work towards a 1% cash reserve by Year 5.

Insurance coverage/plan

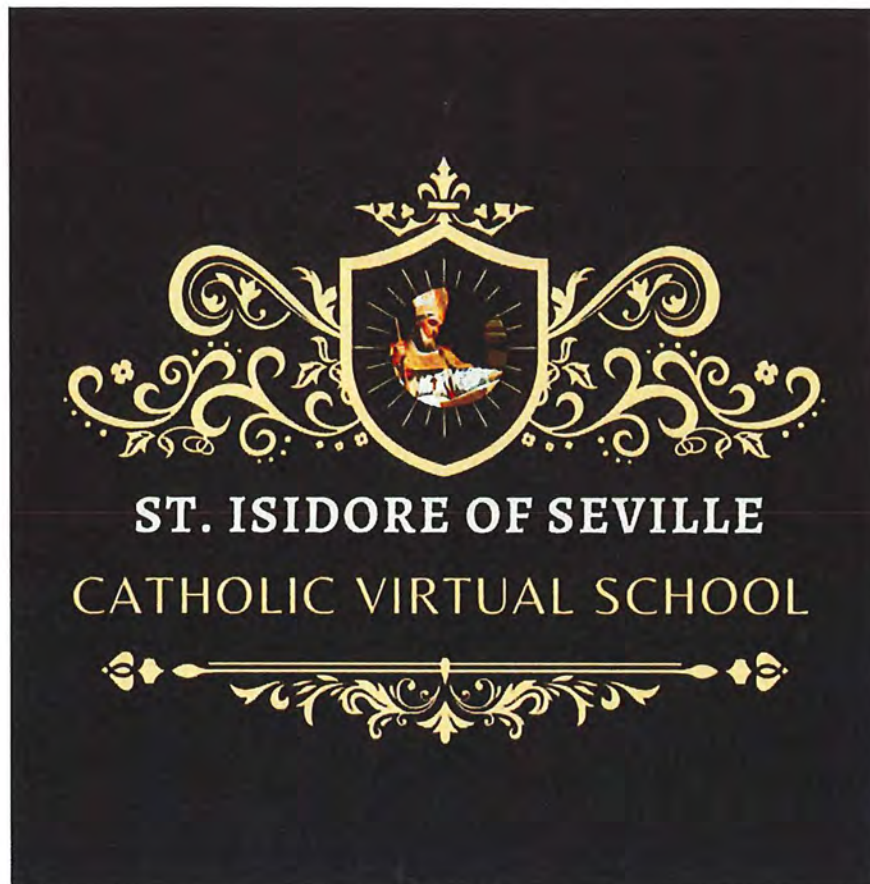
The types and amounts of insurance coverage for the St. Isidore of Seville Catholic Virtual School will include liability, property loss, and personal injury, at a minimum.

- General Liability Insurance- \$1M each occurrence, \$2M Aggregate
- Directors & Officers Coverage- \$1M limit
- Employment Practices Liability Coverage- \$1M limit
- Umbrella Coverage- no less than \$3M
- Third Party Liability Coverage
- Non-Owned/Commercial Auto Coverage
- Educators Professional Liability Insurance
- Improper Sexual Conduct Liability Supplemental coverage
- Crime Insurance- \$300k limit
- Worker's Compensation

- Cyber Security Coverage

Verifiable proof of secured funds for each source of revenue and documentation to support any agreement, donation, or loan that supports the budget

See **Appendix I**. The Archdiocese of Oklahoma City have provided a Letter of Support assuring the Oklahoma State Virtual Charter Board that the school will have sufficient funds to launch and start operations.



Section 9: Education Program and Performance

**Section 9: Educational Plan:
Curriculum and Instructional Model**

Instruction is delivered by the teacher via synchronous and asynchronous using teacher created lessons and utilizing the Archdiocese of Oklahoma City Standards and Benchmarks and research-based curriculum resources as guides in their creation. [Archdiocese of Oklahoma City Standards and Benchmarks](#). See below for additional information.

Teachers teach best when they have prepared their own materials with the appropriate expectations of desired rigor and classroom capability in mind. Teachers will utilize Canvas by Instructure which allows for courses to be designed in a variety of ways. Canvas provides for the upload of videos and pdfs, links to websites, and the importing of info from a variety of curriculum resources. Each teacher will utilize this platform. Assessments can be conducted in a variety of ways as well.

Grade Bands	Sample Daily Activities
Grades K-3	Early Elementary K-3 Sample Activities: <ul style="list-style-type: none"> • Parent/guardian logs into the SISCVS learning system • SISCVS learning management page will contain lessons for the day and scheduled activities including those activities to be supported by the parent/guardian and teacher. • Teacher will provide a schedule of online live classes each day for direct instruction. • Parent/guardian and student read together the assignments and the daily schedule • Student and parent/guardian organize the materials for the day's lessons and begin typical early elementary activities in three to four subject areas of concentration involving perceptual-motor development, reading individually out loud, listening, reading together out loud, and basic numeracy skill development • Student and parent/guardian attend periodic synchronous sessions via the web classroom with the teacher of record • Student participates independently in technology supported learning games served up by the SISCVS System • Teacher verifies attendance (5.5 hours required daily) • Teacher and Parent/guardian review progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student
Grades	Upper Elementary 4-5 Sample Activities:

4-5	<ul style="list-style-type: none"> • Parent/guardian and student log into SISCVS System • SISCVS System serves up lessons for the day and scheduled activities including those activities to be supported by the parent/guardian and teacher • Teacher will provide a schedule of online live classes each day for direct instruction. • Parent/guardian and student read together the assignments and the daily schedule • Student and Parent/guardian organize the materials for the day's lessons and begin typical upper elementary activities in four to five subject areas of concentration involving perceptual-motor development, reading individually out loud, listening, reading together out loud, and basic numeracy skill development in addition to science, language development, and foreign language study if assigned. • Student is introduced to age-appropriate novels and other readings and assigned readings from a reading list of relevant novels • Student interacts with technology supported learning activities designed to strengthen academic skills at a level determined by computer adaptive academic skill testing to be the appropriate level for the student. • Teacher verifies attendance (5.5 hours required daily) • Teacher and Parent/guardian review progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student
Grades 6-8	Middle School 6-8 Sample Activities: <ul style="list-style-type: none"> • Parent/guardian and student log into SISCVS System • SISCVS System serves up lessons for the day and scheduled activities including those activities to be supported by off-line activities and the organization of science experiments to be done in concert with the online science curriculum • Teacher will provide a schedule of online live classes each day for direct instruction. • Parent/guardian reviews the days lessons and activities with the student • Five subject areas are prepared for the day's learning activities • Student attends synchronous learning sessions present under the direction of the teacher • Student interacts with others online in the development of group projects and assignments that require peer collaboration to complete

	<ul style="list-style-type: none"> • Student interacts with technology supported learning activities designed to strengthen academic skills at a level determined by computer adaptive academic skill testing to be the appropriate level for the student • Student works independently on skill and knowledge attainment assignments • Student reviews expected outcomes for the day • Student takes quizzes and end of unit exams to measure skill mastery and attainment based on the lessons for the day • Student electronically submits all required written assignments to the teacher • Teacher verifies attendance (6.75 hours required daily) • Teacher, student and Parent/guardian review daily progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student • Parent/guardian logs into Parent/guardian SISCVS System account to review progress and request assistance if needed • Teacher meets virtually and by web conference tools with Parent/guardian and Student at least every 30 days to review monthly progress, complete required documentation, and provide academic counseling or referrals to appropriate agencies for services as needed
<p>Grades 9-12</p>	<p>High School 9-12 Sample Activities:</p> <ul style="list-style-type: none"> • Student logs into SISCVS System • SISCVS System serves up lessons for the day and scheduled activities including those activities to be supported by off-line activities and the organization of science experiments, readings, written assignments, and synchronous activities to be done in concert with the online curriculum • Teachers will provide a schedule of online live classes each day for direct instruction. • Student reviews the daily lessons and activities with the Parent/guardian • Students review expected outcomes for the day • Five subject areas are prepared for the day's learning activities • Student attends synchronous learning sessions present under the direction of the teacher • Student interacts with others online in the development of group projects and assignments that require peer collaboration to complete

	<ul style="list-style-type: none"> • Student interacts with technology supported learning activities designed to strengthen academic skills at a level determined by computer adaptive academic skill testing to be the appropriate level for the student • Student takes quizzes and end of unit exams to measure skill mastery and attainment based on the lessons for the day • Student electronically submit all required written assignments to the teacher • Teacher verifies attendance (6.75 hours required daily). teacher, Student and Parent/guardian review daily progress and teacher modifies SISCVS System's course pacing and supplemental lessons as needed to maximize the learning potential of the student • Student may participate in interest clubs, student government, and intramural sports • Student participates in community support activities • Parent/guardian logs into Parent/guardian SISCVS System account to review progress and request assistance if needed • Teacher meets virtually and by web conference tools with Parent/guardian and student at least every 30 days to review monthly progress, complete required documentation, and provide academic counseling or referrals to appropriate agencies for services as needed <p>Some students receive and execute assignments early in the morning on the same rhythm of a traditional school, but many more find their productivity is best in the afternoon or evenings. At the St. Isidore of Seville Catholic Virtual School, students meet according to schedule, but asynchronously learn at the times convenient to their schedules while ensuring the daily minimum of instructional hours. A weekly schedule follows what is presented in a daily schedule and is consistent over time. The Scope and Sequence of the curriculum drives what and when standards are being taught throughout the academic year.</p>
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Learning environment

St. Isidore of Seville Catholic Virtual School will provide live instruction within the SISCVS system and accessed via the students' course dashboard. This synchronous instructional tool is used for one-on-one sessions between teacher and students as well as for collaboration among students. A teacher's virtual office houses a whiteboard, chat room, and webcams to promote collaboration. Additionally, share screen features are controlled by the teacher, and shared documents can be edited simultaneously. Within these meetings, teachers can create "breakout" rooms where collaborative groups can meet to discuss a project or work on

content. Guidance for families on establishing conducive work and learning spaces at home will be shared by the classroom teacher.

Teachers will also utilize asynchronous sessions. This is to allow for differentiation to take place for reading, math groups, project coaching, writing feedback sessions, and one-on-one help.

Curriculum overview

St. Isidore of Seville Catholic Virtual School will utilize the standards and benchmarks of the Archdiocese of Oklahoma City [Archdiocesan Curriculum Standards and Benchmarks](#) which are a compilation and adaptations of NCTE English and Language Arts Standards, NCTM Math Standards, Next Generation Science Standards, C3 Framework, Common Core, and Oklahoma State Standards, and various diocesan standards from across the country. The school's standards and benchmark curriculum and instructional framework is guided by national best practice and is reviewed and updated every seven years.

- Curriculum resources utilized to meet the standards and benchmarks must be research based, innovative, and rigorous.
- The course of study includes core subjects in Religion, Math, Science, Reading/Literature, English, History/Social Studies, fine arts, world languages, special interest electives and career-focused electives.
- The curriculum design methodology uses principles of Universal Design for Learning, ensuring that both the curriculum and the instructors provide multiple opportunities for engagement, representation, as well as action and expression to ensure that students will spiral with the same topics throughout their career, each time increasing the complexity in order to reinforce previous learning, and also to reteach concepts one-on-one and in small groups to ensure mastery.
- School Graduation Credits will be tracked utilizing FACTS SIS and within the Counseling Department utilizing OSDE forms. [Graduation Requirement Form, OSDE, 2026](#)
- Lab Science for Middle School and High School will be conducted with partnership with local universities or by utilizing a wider net of resources. ([Making Science Labs Available Virtually](#) © 2023 Center for Teaching and Learning | Wiley Education Services)
- Course of Study for High School Students meet the Oklahoma graduation requirements and are enhanced by AP and concurrent class options for college credit. Certificate programs through Google, Meta, and Coursera will also be offered to enhance the education of a student wishing to utilize the skills in post-secondary education or the workforce.

Instructional Delivery and Resources

Instruction will be driven by teacher created lessons based on materials from research-based curriculum providers. Teachers may enhance or supplement their lessons from a variety of

sources. Some of the proposed vendors are listed below, this list is expected to grow as research continues to be done in preparation of a virtual program:

K-5	6-8	9-12
<ul style="list-style-type: none"> Teacher Created Lessons Uploaded into Canvas Research Based Curriculum Resources and Textbooks Supplemental Resources Educational Apps Direct Instruction synchronously Small Group Instruction Asynchronous Instruction 	<ul style="list-style-type: none"> Teacher Created Lessons Uploaded into Canvas Research Based Curriculum Resources and Textbooks Supplemental Resources Educational Apps Direct Instruction synchronously Small Group Instruction Asynchronous Instruction CTE Courses within subject area Summer Credit Recovery 	<ul style="list-style-type: none"> Teacher Created Lessons Uploaded into Canvas Research Based Curriculum Resources and Textbooks Advanced Placement Course Concurrent Courses Certificate Programs Supplemental Resources Educational Apps Direct Instruction synchronously Small Group Instruction Asynchronous

Curriculum Resources

To address the wide range of learners at St. Isidore of Seville Catholic Virtual School, a variety of standards-aligned additional resources are utilized by teachers:

- Researched Based Curriculum/ Textbook Publishers: Saavas, HMH, McGraw Hill, Prentice Hall, Memoria Press, Sadlier, Zaner Bloser, and others
- High Quality Literature, Poetry, and Nonfiction Selections
- iReady - an assessment and instruction program for Math and English Language Arts that provides a diagnostic, aligned instruction, and teacher resources to help accelerate students toward grade level proficiency and beyond
- BrainPop – an online animated curriculum-based content that is aligned to state standards. It includes videos, games, quizzes, and activities for science, health, writing, reading, social studies, and math.
- DIBELS – provides a battery of short (one minute) fluency measures that can be used for universal screening, benchmark assessment, and progress monitoring in kindergarten – 3rd grade.
- IXL – an interactive online learning solution aligned to state standards that helps teachers personalize instruction through comprehensive curriculum, continuous diagnostics, and guidance for skill building.
- NewsELA – an instructional content platform that provides teachers and students with access to 20+ genres of content to support core instruction, like primary sources, reference texts, essays, fiction, issue overviews, and more at 5 reading levels.
- Reading A-Z – an instructional content platform that provides thousands of downloadable, projectable, printable teacher materials, covering all the skills necessary for effective reading instruction.
- IEW-Institute for Excellence in Writing. Using the four language arts—listening, speaking, reading, and writing—I EW methods have been proven to be effective for students of all ages and levels of ability, including those who are gifted, have special needs, or are English language learners.
- Delta Science, Carolina, University provided lab lessons
- Babbel, Rosetta Stone- World Language programs in addition to teacher guided lessons

All the selected vendors have data available to support the effectiveness of their offerings, and the school's choice of the vendors is based on extensive evaluative information reviewed by The Archdiocese of Oklahoma Director of Education and the Superintendent of Schools for the Diocese of Tulsa in proposing the education program to be offered to the St. Isidore of Seville Catholic Virtual School Board. Each vendor aligns with the instructional methodology of the school by embedding the pedagogy of personalized learning and backward design principles in all courses. These methods are research-based and imperative for the leaders of tomorrow. Small group and individual instruction when warranted builds strong learners.

Instructional Strategies

Teacher-created direct instruction puts students' needs at the forefront of the instructional design, allowing for them to be wholly involved in each aspect of their learning. Instruction will be synchronous and asynchronous in order to meet the needs of all students. Students can progress through the independent aspects of their lessons at different paces based on their rate of mastery, yet the school has grading and progress expectations that all students

must meet for each term. In the virtual setting, the benefit rests within the flexibility and fluidity for each student's schedule. The daily experience of a St. Isidore of Seville Catholic Virtual School student includes scheduled live instructional sessions, scheduled small group targeted sessions, participation in Socratic discussions to improve a respect for dialogue and the improvement of oral language and critical thinking skills, and 24/7 access to asynchronous course work and supplemental curriculum resources, aligned to Archdiocesan standards that meet or exceed state standards. This student-centered learning approach allows for more active learning, increased comprehension, and responsibility which fosters independence, accountability, and time-management - all critical skills for higher education, the job force of today, and everyday life. Students will also have personalized learning opportunities to help them develop their own learning strategies and be engaged in the learning process by having a voice in the process.

An important addition to individualizing instruction according to student needs is that as students' progress through the digital curriculum asynchronously, the Learning Management System within SISVCS captures the results of short cycle assessments in a color-coded mastery dashboard against state standards, equipping teachers with the immediate data needed to provide targeted synchronous instruction. The St. Isidore of Seville Catholic Virtual School instructional model plans synchronous instruction as a chance to add instructional value above and beyond what is already available in the asynchronous model. Teachers use data to determine which students need one-on-one direct instruction or small learning groups in order to both differentiate and tailor instruction to students' real-time needs. This is especially effective in remediation situations. In order to support student engagement, peer interactions will be hosted within small and large virtual classroom settings, to ensure individual attention, increased participation, and better communication.

Lastly, instruction is embedded within a Multi-Tiered System of Supports (MTSS/RtII). MTSS/RtII uses assessment, intervention, and targeted instruction to ensure the academic, social, and emotional growth of each child within three tiers - whole group, small group interventions, and individualized support.

Career Readiness and Workforce Development Program:

Oklahoma and the nation face a critical shortage of qualified employees with the skills and training needed to fill available jobs. In February 2021, ACTE reported that 55% of jobs in Oklahoma require skills training – more education than high school but less than a four-year degree; however, only 47% of Oklahoma workers are trained at this level. St. Isidore of Seville Catholic Virtual School career readiness program aims to help to fill these gaps. One way will be by allowing students to participate in professional online certificate programs that build real life skills that transfer to work opportunities after graduation. These skills can help a student to continue their education while working at the same time.

St. Isidore of Seville Catholic Virtual School will offer a comprehensive career readiness program that is an integrated and inclusive approach to student learning that is designed to close the skills, interest, and equity gaps in this evolving, global society. Our process will parallel the vision and goal of the Oklahoma Department of Education's Individual Career Academic Plan (ICAP) and House Bill 2155.

In order to achieve this goal, a Career Tech Education (CTE) Coordinator will be hired to formulate and administer a comprehensive CTE program across grades K-12. This includes working collaboratively with families, school leadership, student services personnel, and teachers to ensure the delivery of career development services for all students.

The CTE coordinator and school counselor will work together to develop and strengthen student's postsecondary goals; however, their roles are differentiated through the support and services provided. The school counselor provides all students with counseling that facilitates academic, career and social/emotional development, helping all students develop plans for choosing a career. The school counselor will coordinate with the CTE coordinator to advocate for career readiness opportunities, which are designed to guide students to success in their chosen careers.

The specific CTE programs of study established will be informed by input from the industry needs of the community, as well as the career interests and the location of students in the program.

The CTE coordinator will build partnerships with local industries, postsecondary institutions, and community and student organizations to foster college and career readiness. Partnering with several of the 29 career tech centers around the state, as well as Jobs for America's Graduates, will increase the total Career Tech enrollments and workforce pipeline for the state of Oklahoma.

Students will have opportunities to work together in real time using digital collaboration tools that are intentionally integrated into the curriculum in order to support both cognitive and non-cognitive skills. St. Isidore of Seville Catholic Virtual School will specialize in the simulation of and/or real world, authentic learning experiences to help students develop key competencies that will allow them to thrive in the workforce. Students will have the opportunity to graduate with workplace experiences, industry recognized credentials and certificates, and/or college credits.

Equipment and Technology Requirements

St. Isidore of Seville Catholic Virtual School will ensure that all students have access to broadband internet to participate in the school program. This may include providing a limited number of Wi-Fi Hotspots to students that live in rural areas with no broadband providers.

All students will be provided with:

- ✓ Hardware
 - Chromebooks
 - Earbuds
 - Cellular Hot Spots (upon request/financial need/approval according to school policy)
- ✓ Software
 - Chrome OS

- GoGuardian

All school staff will be provided with:

- ✓ Hardware
 - Windows Laptop
 - External Monitor (upon request/approval)
 - Keyboard (upon request/approval)
 - Mouse (upon request/approval)
 - Headset (upon request/approval)
- ✓ Software
 - Microsoft 365 Suite
 - One Drive storage space
 - Business Intelligence (BI) Tools (One or more of the following)
 - Domo
 - PowerBI
 - High Speed Internet Connectivity (School Office Only)
 - Cisco Meraki Hardware (School Office Only)
 - Switches
 - Wireless Access Points
 - Content Filtering
 - Ring Central Telephones (School Office Only)

Students and staff are provided with:

- ✓ Software
- ✓ Google G-Suite
- ✓ Kami
- ✓ Learning Management System (LMS)
 - Instructure Canvas
- ✓ Student Information Systems (SIS) – FACTS SIS
- ✓ Web Conferencing (One or more of the following)
 - Big Blue Button
 - Zoom
- ✓ Communications – FACTS SIS
- ✓ Curriculum Resources/ Enhancement (One or more of the following)

○ Accelerate Education	○ IXL Learning
○ StrongMind	○ Raz Kids
○ eDynamic Learning	○ Brain Pop
○ Moby Max	○ Voyager Sopris (Dibels)
○ Pear Deck	○ n2y Unique
○ Newsela	○ Amplify
○ Gizmos	○ Core Knowledge Foundation
○ Overdrive	

- Pearson
- Memoria Press
- Tan Books
- HMH, McGraw Hill,
- Saavas
- Shurley English
- Zaner Bloser
- Sadlier
- Math in Focus

- ✓ Assessments (One or more of the following)
 - Instructure Mastery Connect
 - NWEA MAP
 - iReady

Assessment Platforms:

- Google
- Edulastic (Go Guardian product for secure testing)

Alignment with Archdiocesan Standards and Benchmarks

As previously stated, the SISCVS system includes state-of-the-art technology with state-specific reporting components, and full curriculum alignment to meet or exceed state standards. Curriculum vendor coursework is embedded seamlessly within the SISCVS system. The St. Isidore of Seville Catholic Virtual School curriculum team first verifies alignment to the state standards, cross referencing with other vendors to ensure effective coverage. When the verification of alignment is completed, any gaps are identified immediately, and the St. Isidore of Seville Catholic Virtual School team procures supplementary materials to support mastery of each standard.

Student Assessment (Internal and External)

Plan to measure and report student progress

A strong assessment plan is the cornerstone of any successful instructional program. Each diocesan school implements numerous assessment tools for students and would propose the following for St. Isidore of Seville Catholic Virtual School. In order to verify curricular alignment to mission, standards and benchmarks, ensure instructional efficacy, and monitor student learning, schools must employ a balanced assessment system that includes several types of testing methods to determine what students are learning, how teachers are teaching, and what instructional and curricular decisions must be made with regard to scaffolding, alignment, adjustments, and interventions. In a balanced assessment program, school leaders plan for diagnostic, formative, interim and summative assessments. In this way, assessment results provide identification of students in need of intervention, feedback to teachers about instructional practice, and verification of curricular strengths and weaknesses.

St. Isidore of Seville Catholic Virtual School Assessment System

- **Incoming Assessment** – All new students will be assessed for learning readiness using Curriculum Based Measure, a computer adaptive, or a nationally normed test. The results from this initial assessment will assist

teachers in developing a personalized plan for each student using Archdiocese of Oklahoma City Standards and Benchmarks and Oklahoma State standards.

Ongoing Assessments – Once a student is enrolled and has finalized his/her personalized plan with an advisor, the student will participate in a variety of performance assessments over time to monitor their progress and modify their academic program keeping them on track for academic success. These assessments include:

- Short Cycle Assessments
- Course level Assessments
- Computer-adaptive Nationally Normed Assessments: The assessments are taken three times per school year by all students. Baselines (incoming assessment) are established the first month of the school year. Once a baseline has been established, performance is also measured in the winter and spring.
- **State tests:** Summative assessments to measure student achievement in learning the standards, if required.
- **Local Benchmark/Diagnostic (Computer Adaptive Nationally Normed)- iReady, NWEA MAP**
- **Incoming Assessment- iReady, NWEA MAP, WRAT**
- **Short Cycle Assessments- iReady (K-8) and MasteryConnect (K-12)**
- **Reading Fluency- DIBELS, STAR Early Learning Literacy (K-2, Reading A-Z)**
- **Classroom Assessments- iReady Standards Mastery, MasteryConnect, Course assessments**
- **Benchmarks for student learning**
 - Local Benchmark/Diagnostic (Computer Adaptive Nationally Normed)- iReady
 - Incoming Assessment- iReady, NWEA MAP, WRAT
 - Short Cycle Assessments- iReady (K-8) and MasteryConnect (K-12)
 - Reading Fluency- DIBELS, STAR Early Learning Literacy (K-2, Reading A-Z)
 - Classroom Assessments- iReady Standards Mastery, MasteryConnect, Course assessments
- **District/school assessments**
 - The specific school assessments are contained in the assessment plan above.
- **Oklahoma School Testing Program (OSTP), if required**
 - State Assessments-
 - Oklahoma Core Curriculum Test for Grades 3-8 and 11 in Mathematics, English Language Arts and Science.
 - Oklahoma Core Curriculum Test for U.S. History administered in Grade 11.

Program Evaluation

Student performance and progress towards standards mastery will be continually monitored at the school level through a defined cycle of data review and data meetings. Each year the

Principal will work with teachers and the assessment team to create the Instruction Plan based on the school's data. This plan will be created once the school Assessment Plan has been finalized and will take into consideration the points at which data will be available from each assessment. The Instruction Plan will detail what groups teachers and school leaders will meet to discuss data, and how often. The plan will define a school-wide data protocol to be utilized to guide review of the data, interpretation of the data, and determination of follow up actions. Specific data to be reviewed in a timely fashion as dictated by the assessment calendar. September reviews are focused on diagnostic data, short cycle data would be reviewed during the 2nd and 3rd testing periods to determine growth and intervention needs.

During these conversations data will be reviewed through multiple lenses:

- Proficiency and growth data
- Individual student level data
- Grade level or grade band data trends
- Subject area trends
- Data by teacher
- Data disaggregated by student subgroup
- Item level analysis
- Standards level analysis

Minutes, team notes and action plans, and needed resources will be captured during each meeting, shared with the school faculty, and placed in a shared digital space for relevant stakeholders to access.

This plan monitors student performance on short cycle assessments and looks at supplemental curriculum usage to identify curriculum gaps/needs, areas of instructional need, and patterns of supplemental usage as it relates to student performance. Particular attention to teaching methods and resources are to be used.

As stated previously, the St. Isidore of Seville Catholic Virtual School Board is committed to academic excellence and will have an unwavering commitment to achieving the school academic goals. Each year, St. Isidore of Seville Catholic Virtual School Board in collaboration with the administrative team will create a school improvement plan based on the annual data analysis of state assessments, review of the year's benchmark assessments, and feedback from the School Improvement Team. The Continuous Improvement Plan (CIP) will contain the required components as defined by §70-5- 117.4., including strategies for improving instruction. In a virtual school, that often includes discussions on the content of synchronous instructional sessions, strategies to improve student engagement, and the use of supplemental curriculum to support student learning gaps. The Board of Directors will approve the CIP and will review progress towards the academic goals at its monthly board meetings.

Schools in the Archdiocese of Oklahoma City and the Diocese of Tulsa are accredited by OCCSAA, Oklahoma Conference of Catholic Schools Accrediting Association, which is overseen

by OPSAC. Certificate of Accreditation is currently up to date and renews in 2026 upon review. The curriculum offered also meets the standards of both the Archdiocese of Oklahoma City, the Diocese of Tulsa, national standards, and Oklahoma standards. St. Isidore of Seville Catholic Virtual School Board will obtain accreditation through the state of Oklahoma for the required period of time and with a national accrediting agency after year two if needed.

Plan for support structures (e.g., online tutoring, home mentors, and technical support services in place 24x7) in addition to teacher support

Teacher-led and teacher created instruction will include synchronous and asynchronous learning opportunities, one-to-one tutoring, organized peer interaction, and a focus on critical skills for success in college and the workforce.

All parents/guardians have access to an initial orientation program so they are prepared to support their student's learning. There are also ongoing parent/guardian support sessions provided in addition to the one-on-one conversations with their student's teacher(s).

Summer School and Tutoring Program: St. Isidore of Seville Catholic Virtual School Board has budgeted for a supplemental tutoring program for those students who need extra support. The focus will be on English Language Arts and Mathematics initially but may expand to other subjects. Summer School is optional and budget dependent.

Technical support services will be managed by staff technology support. This will include troubleshooting for hardware, internet, and program problems that may be experienced at home by the student and guardian.

Special Education

Support for diverse learners

Students enrolled in St. Isidore of Seville Catholic Virtual School Board will receive a Free and Appropriate Public Education in the Least Restrictive Environment to the maximum extent possible through a virtual education program.

Child Find

The Individuals with Disabilities Education Act (IDEA) 20 U.S.C. § 1412(a)(5)(A) states, to the maximum extent appropriate, all students with disabilities, 3 through 21 years of age, are to be educated with age-appropriate peers, both with and without disabilities. This process is known as the least restrictive environment (LRE). The LRE is the appropriate balance of settings and services to meet the student's individual needs. The Local Education Agency (LEA) must have an array of services and a continuum of alternative placements/educational setting options available to meet the individual LRE needs of each student (34 C.F.R. §§ 300.114 and 300.115). An appropriate LRE is one that enables the student to make reasonable gains toward goals identified in an Individualized Education Program (IEP). The student's IEP must indicate the individualized LRE placement. The IEP team must consider to what extent, if any, the student will or will not participate in the general education classroom environment, the general education curriculum, and extracurricular or other

nonacademic activities. This provision includes students with disabilities placed in public or private institutions or other care facilities by the IEP team. Special classes, separate day school, and other removals of a student with a disability from the general education environment may occur only when the nature or severity of the disability is such that education in the general education class, even with the use of supplementary aids and services, cannot be achieved satisfactorily. [Child Find, Least Restrictive Environment, OSDE Handbook pg. 182](#)

Students who may not be performing in line with expected outcomes from the Archdiocesan Standards and Benchmarks which meet or exceed Oklahoma Standards and Benchmarks may be referred to the Student Support Team (SST) consisting of general education teachers, special education staff, and school administrators for review of data as screening of possible learning difficulties. A variety of methods may be used to screen students, including performance-based assessments, curriculum-based measures, daily classroom work, observations, developmental achievements, and kindergarten readiness measures, all of which are assessments or activities that would be given to all students. If through the screening, a student is identified as possibly having a disability or in need of special education services, parents may be asked for their consent to evaluate their child. Special education referrals for evaluation may be made by the parent for a variety of reasons, including but not limited to academic and/or behavioral concerns. Students referred must be assessed within 45 days.

Multi-Tier System of Support (MTSS) Plan

St. Isidore of Seville Catholic Virtual School will implement comprehensive coordinated services and activities that provide educational and behavioral evaluations, services, and support. These services may include professional development for teachers and other staff, enabling them to deliver scientific research based academic and behavioral interventions. This may include scientifically based literacy instruction, and where appropriate, training on the use of adaptive and instructional software. Research based curriculum resources will be used and best practice in instructional strategies employed.

Students may be referred for special education evaluation by their parent/guardian, teacher, or the Student Support Team (SST). The team, consisting of general education teachers, special education staff, and school administrators will regularly review data on students that are not progressing as expected. The SST will consult with the parent/guardians and address struggling students' needs through the Multi-Tier System of Support (MTSS) which includes the Response to Instruction and Intervention (RtII) process and Positive Behavioral Intervention and Supports (PBIS). The teacher will implement and document interventions and the student's response to interventions. If a student is referred for an evaluation, the students' response to MTSS efforts are used as one data metric in the determination of special education eligibility. These interventions will not be used to delay or deny a parent/guardian- requested special education evaluation. A student's eligibility for special education and related services will be determined through assessments administered by a school psychologist, classroom data, review of records and parent and teacher input.

St. Isidore of Seville Catholic Virtual School may employ a school psychologist, or contract with a specialist to evaluate students for services. Parents may also secure their own qualified testing specialist to complete their child's evaluation if they choose. Such specialist could include:

Testing Service	Address	Phone
University Counseling Center The University of Oklahoma Goddard Health Center	620 Elm Ave, Ste. 201 Norman Oklahoma	405-325-2911
University Of Central Oklahoma (UCO) Learning and Behavior Clinic	301 S. Boulevard Edmond, OK 73034	Jeremy Medders 405-285-6671
Cathy Reim	13301 S. Pennsylvania Oklahoma City, OK 73170	405-659-1027
Keys Speech & Hearing Center, OU Health Sciences Center	825 NE 14th Oklahoma City, OK 73104	405-271-4214
Reach-Resources & Evaluation for Achievement	6033 Heirwich Manor Oklahoma City, OK 73132	Kim Dixon 405-722-3062
Paula Stanford – Learning Styles	6520 N. Western, Suite 101 Oklahoma City, OK 73116	405-524-4610
Child Study Center, OU-HSC	1100 NE 13th Oklahoma City, OK 73117	Darlene Harris 405-271-6824
Dr. Leslie Rundell	Lakeshore Tower 4301 NW 63rd St., Suite 102 Oklahoma City, OK 73116	405-848-2511

Encouraging Words Speech, Dyslexia	2949 W Hefner Rd Oklahoma City, OK 73120	Laura Gautreaux 405-578-4442
Elite Therapy	1505 Renaissance Blvd. Edmond, OK 73013	Dr. Miracle Goetz 405-340-7056
Dr. Sharon Mullins	2000 E 15th St Edmond, OK 73013	405-330-8733
Speech & Hearing Associates	2500 S. Broadway #200 Edmond, OK 73013	Linda Elliott 405-340-7056
Speech & Hearing Associates	2500 S. Broadway #200 Edmond, OK 73013	Linda Elliott 405-340-7056
Tulsa Developmental Pediatrics & Center for Family Psychology	4520 S. Harvard, Ste. 200 Tulsa, OK 74132	Marie Conley 918-743-3224
Tulsa Ritecare Childhood Language Clinic	9525 E 51st, #6 Tulsa, OK 74101	918-622-7064
McAlester Rite care Clinic	305 N. 2nd Street McAlester, OK 74501	918-426-2300
Oklahoma State University Speech Language Hearing Clinic (Sponsored by Ritecare: Guthrie Scottish Rite Masons)	Stillwater	Lisa Ashley, M.Ed. CCC- SLP

Heartspring- Testing for Autism	8700 E. 29th St. North Wichita, KS 76226	800-835-1043
Southern Methodist University Diagnostic Center For Dyslexia & Related Disorders	5236 Tennyson Parkway, Bldg. 4, Suite 108 Plano, TX 75024	Helen Macik 214-768-7323
Cornerstone Behavioral Health	1212 S. Air Depot, Ste 9 Midwest City, OK 73110	405-455-6868
Oklahoma Pediatric Therapy Center	1817 Commons Circle Ste A, Yukon, OK 73099	405-467-6782

Students determined in need of an itinerant or supplemental level of support will access the general education curriculum with accommodations and modifications as outlined in their IEP in the general education classroom with their typical peers. Special education and general education teachers will collaborate to make necessary accommodations and modifications. Students may receive more intense instruction in small groups (with or without general education peers) or one-on-one instruction and intervention, depending on the specific needs of the student and as described in the student's IEP. Students that qualify for the alternative state assessment, Oklahoma Alternative Assessment Program (OAAP), will utilize a comprehensive program using an alternative curriculum which will include core content, social skills instruction and daily living skills based on individual needs.

Alternative placements are considered when the current educational environment is no longer meeting the needs of the student and the IEP team determines that a student needs more intensive support and programming than what a virtual program can offer. Alternative placements can include center-based programs, approved private placements and/or home and hospital instruction.

Individualized Disability Education Act (IDEA) & Section 504 Rehabilitation Act

St. Isidore of Seville Catholic Virtual School Board estimates that 20% of the student population will require special education support and services. This estimate is based on a 2% increase on the available data for statewide virtual charter schools taken from the 2021 Oklahoma Virtual Funding Study. Data indicates at the time, 18% of virtual charter students qualified for special education services. ([OK Virtual Funding Study](#) p. 35, 2021)

St. Isidore of Seville Catholic Virtual School Board will comply with all applicable State and Federal Laws in serving students with disabilities, including, but not limited to, Section 504 of the Rehabilitation Act ("Section 504"), the Americans with Disabilities Act ("ADA"), the Individuals with Disabilities Education Act ("IDEA"), as well as Oklahoma Special Education Rules to the extent that it

does not compromise the religious tenets of the school and the instructional model of the school. The proposed school administrative office will be ADA compliant.

Transfer/New Enrollment with existing IEP or 504

After a student's application for enrollment has been confirmed, families will be given the opportunity to inform the School if their child has an IEP or 504 Plan. The parent/guardian/adult student may provide a copy of the documents, or the St. Isidore of Seville Catholic Virtual School will request the documents from the previous school.

Upon enrollment, the Student Support Team will review the evaluation report and IEP from the previous school district. After consultation with the parent/guardian/adult student, the school will offer comparable services as outlined in the student's existing IEP. The Student Support Team will be convened within 10 instructional days of obtaining the IEP to adopt or amend the existing IEP. For a student with an existing 504 Plan, we will convene a Student Support Team meeting with the parent/guardian/adult student in a reasonable amount of time, but no later than 30 days after the obtainment of the 504 plan. In addition to being active participants in the IEP and 504 Student Support Team meetings, the parent/guardian/adult student will be provided with a copy of the Procedural Safeguards Notice on a yearly basis at minimum.

Eligibility for special education and related services as a young child shall be determined on the basis of multiple sources of information, including, but not limited to:

- Vision/hearing screening
- Health/medical information
- Adaptive behavior
- Social/emotional status
- General intelligence
- Academic performance (present levels)
- Communication status (speech/language functioning)
- Motor abilities
- Developmental history
- Observations of the student during instruction
- Historical review of the student's academic progress
- Interview(s) with parent(s) and teacher(s)
- Assistive Technology (AT)

A medical or health diagnosis does not automatically qualify a student for special education services under IDEA; but a group should consider the data as part of a comprehensive evaluation.

Student Service Team

Once consent is obtained from the parent, a group is formed to carry out the evaluation process. The members of each evaluation group may differ; however, there are specific members and skills that must be represented. Members include:

1. The parents of the student.

2. A general education teacher.
3. The special education Director
4. A special education teacher.
5. At the discretion of the parent or SISCVS, other individuals who have knowledge or special expertise regarding the student, including related services personnel as appropriate; and
6. Other qualified professionals, as appropriate.
 - a. Is qualified to provide, or supervise the provision of, specially designed instruction to meet the unique needs of students with disabilities.
 - b. Is knowledgeable about the general education curriculum; and
 - c. Is knowledgeable about the availability of resources of the public agency.
 - d. an individual who can interpret the instructional implications of evaluation results, who may also hold another position on the IEP team, such as a teacher.
 - e. At least one contracted person qualified to conduct individual diagnostic examinations of children, such as a school psychologist and/or a speech-language pathologist.

St. Isidore of Seville Catholic Virtual School will employ as possible or contract with professionals in the following categories to secure the necessary testing to determine if special education services are necessary for success:

1. Speech Pathologist
2. Occupational Therapy
3. School Psychologist
4. Vision and Hearing Screening Programs
5. Assistive Device Consultants

Parent Participation

If parent(s) cannot attend scheduled Student Service Team meetings, other methods may be utilized to ensure parent participation, including Zoom, or similar individual or conference telephone calls. Following evaluation and providing special education and related services to your child for the first time with parental consent, meetings may be conducted without a parent in attendance if St. Isidore of Seville Catholic Virtual is unable to convince the parent that they should attend and the school has a record of reasonable attempts to schedule meetings at a mutually agreed on time and place. In these cases, Written Notice to Parents will be used to inform the parents of any group decision and reasons for that decision.

Timeline

Oklahoma has established a 45 school-day timeline. The timeline for conducting the initial evaluation starts upon receipt of written parental consent to conduct the evaluation and ends with the determination of eligibility for special education services. St. Isidore of Seville Catholic Virtual School will abide by the timeline in all but the following instances:

- a) The 45 school-day timeline does not apply to a public agency if: 34 CFR §300.301.
- b) The parent of the child repeatedly fails or refuses to produce the child for the evaluation; or
- c) If a child enrolls at SISVCS after an evaluation has begun at another district. SISCVS will make every attempt to make sufficient progress but will petition the parent for a mutually agreeable timeline for completion of eligibility.

The time between eligibility determination and implementation of the individualized education program (IEP) cannot exceed 30 calendar days. The IEP will consist of goals and benchmarks as outlined in the Oklahoma Special Education Handbook. [Oklahoma Special Education handbook, 2022](#)

Transitions in Education

Early childhood

Students discovered through Sooner Start and/or other child find systems transferring into the Kindergarten of St. Isidore of Seville Catholic Virtual School will:

1. Conduct an annual IEP Review Meeting and address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
 - b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
 - c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.

Intermediate Grades

As students transition into grades 3-5, it is imperative that students understand that the power to learn lies within them and that it is only a matter of finding the right strategies to ensure their success. This can be accomplished in several ways:

1. Conduct an annual IEP Review Meeting and address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
 - b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
 - c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.

2. Beginning of the year onboarding process (can be revisited after long breaks during the year)
 - a. Managing the collaborative process within the Google Suite
 - i. What is respectful discourse?
 - ii. How do we support our fellow classmates in a positive way?
 - iii. Understanding the Citing Process; giving credit where credit is due
 - b. Managing a synchronous and asynchronous schedule
 - i. How to plan the day and stick to it
 - ii. Understanding the concept of time; using alarms
 - c. Understanding that we are created for the good and in turn we give the good in what we do, the virtues of industriousness, kindness, perseverance, understanding, justice, fairness.
 - i. Turning in quality work: What is quality for them?
 - ii. Being prepared for class in dress, attitude, and course preparations
 - iii. Being a good classmate for others

Middle School

Students on an IEP transitioning from a self-contained classroom into a departmentalized middle school program will follow the process below in order to ensure that supports are in place to assist in a successful transition to the next level of education.

1. Conduct an annual IEP Review Meeting and will address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
 - b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
 - c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent;
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.
2. Beginning of the year onboarding process (can be revisited after long breaks during the year)
 - a. Managing the collaborative process within the Google Suite.
 - i. What is respectful discourse?
 - ii. How do we support our fellow classmates in a positive way?
 - iii. Understanding the Citing Process; giving credit where credit is due
 - b. Managing a synchronous and asynchronous schedule

- i. How to plan the day and stick to it
 - ii. Understanding the concept of time; using alarms
 - c. Understanding that we are created for the good and in turn we give the good in what we do, the virtues of industriousness, kindness, perseverance, understanding, justice, fairness.
 - i. Turning in quality work: What is quality for them?
 - ii. Being prepared for class in dress, attitude, and course preparations
 - iii. Being a good classmate for others
- 3. Multiple Intelligence Assessment for all students-
 - a. Where are their natural strengths?
 - b. What is a weakness that can be developed?
 - c. College and career coursework designed to highlight various careers, professionals in those careers, and skills needed to develop this interest.

High School

Students on an IEP transitioning from middle school to the high school program will follow the process below in order to ensure that supports are in place to assist in a successful transition to the next level of education.

1. Conduct an annual IEP Review Meeting and will address the following areas:
 - a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
 - b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
 - c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
 - d. Gather additional information about the student provided by the parent.
 - e. The student's anticipated needs in the upcoming grade level
 - f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.
2. Beginning of the year onboarding process (can be revisited after long breaks during the year)
 - a. Managing the collaborative process within the Google Suite.
 - i. What is respectful discourse?
 - ii. How do we support our fellow classmates in a positive way?
 - iii. Understanding the Citing Process; giving credit where credit is due
 - b. Managing a synchronous and asynchronous schedule
 - i. How to plan the day and stick to it
 - ii. Understanding the concept of time; using alarms

- c. Understanding that we are created for the good and in turn we give the good in what we do, the virtues of industriousness, kindness, perseverance, understanding, justice, fairness,
 - i. Turning in quality work: What is quality for them?
 - ii. Being prepared for class in dress, attitude, and course preparations
 - iii. Being a good classmate for others

3. Multiple Intelligence Assessment for all students-

- a. Where are their natural strengths?
- b. What is a weakness that can be developed?
- c. College and career coursework designed to highlight various careers, professionals in those careers, and skills needed to develop this interest.

Post secondary

St. Isidore of Seville Catholic Virtual School will assist high school students on an IEP in the transition process from high school to post-secondary school environments utilizing the [Oklahoma Secondary Transition Guide](#) along with other college and career readiness resources to offer them potential options that will support their dignity as a person of God and help them realize their talents and skills.

1. Conduct an annual IEP Review Meeting and will address the following areas:

- a. Whether the student's annual goals have been achieved up to the point of transition, including those for related services necessary for elementary transition
- b. Whether there is any lack of expected progress toward annual goals or in the general education curriculum as appropriate to grade level
- c. Whether any additional assessments are necessary and to address the results of those conducted with an update to the IEP
- d. Gather additional information about the student provided by the parent;
- e. The student's anticipated needs in the upcoming grade level
- f. Continue to monitor the continuing eligibility of the student based on an evaluation or review of a variety of data, which may include formal or informal assessment, progress toward IEP goals and when applicable benchmarks/objectives.

3. Multiple Intelligence Assessment for all students-

- a. Where are their natural strengths?
- b. What is a weakness that can be developed?
- c. College and career coursework designed to highlight various careers, professionals in those careers, and skills needed to develop this interest.

Appropriate documentation will be provided to the parents, and all faculty and staff who have the designated approval for notification.

The Oklahoma Transition Guide, p. 10 provides a good illustration of the processes necessary to assist students transferring into post-secondary education, career, or other life situations. ([Oklahoma Transitions Guide](#))



English Learner support

Evaluations must consider the child's English language skills and ethnic background to ensure that the testing and evaluation will be equitable for children of any race or culture. Tests will be given in the native language or mode of communication that is most likely to give accurate information on what the child knows and can do academically, developmentally, and functionally, unless it is clearly not feasible. Upon enrollment in St. Isidore of Seville Catholic Virtual School, the parent/guardian will complete a Language Preference Form/survey to ensure, to the ability possible, that communication and assessments are delivered in the student/family's native language.

St. Isidore of Seville Catholic Virtual School will meet the needs of English Language Learners as required by State and Federal law by increasing the English language proficiency (ELP) and academic language proficiency in content-area subject matter. The school will seek to employ teachers with the teaching ESL endorsement and will serve as the English learners' Teacher of Record. The EL teacher-to-student ratio is set at 1:35 in the school budget.

All English Learners in the St. Isidore of Seville Catholic Virtual School will have an English Language Acquisition Plan (ELAP) per state guidance, and the ELAP will be implemented with fidelity by all teachers and staff who work with the student. The ELAP will detail strategies, instructional and assessment accommodations, modifications, goals for the student, and results on the state and local assessment data. The ELAP will be updated annually or earlier if needed to reflect the student's language proficiency growth.

The ELAP will:

- Meet or exceed Oklahoma academic standards for the appropriate grade level of the ELs;
- Include EL instruction delivered by properly certified teachers who hold an Oklahoma ESL endorsement certificate or who are working in conjunction with ESL endorsed teachers;
- Provide equitable access to content for ELs at all language proficiency levels by providing research- based bilingual or sheltered instruction with fidelity; and

- Not limit the enrollment of ELs in any course or academic program for which they would otherwise be eligible.

EL students will be monitored for their progress throughout the school year and assessed annually using assessments that are recognized by World-Class Instructional Design and Assessment (WIDA). The WIDA Consortium is an educational consortium of state departments of education. Currently, 35 U.S. states and the District of Columbia, as well as Puerto Rico and the Northern Mariana Islands, participate in the WIDA Consortium. WIDA designs and implements proficiency standards and assessments for grade K-12 students who are English-language learners. WIDA is the organizer of the WIDA ACCESS and W-APT English language proficiency assessments. This is a federally mandated test for all EL students. There are no exemptions. Students who meet Oklahoma's exit criteria of at least a 4.8/6.0 on that assessment will be reclassified and exit EL services. Monitoring will continue. It is an Oklahoma mandate that **all EL students** in grades K-12 take tests appropriate to their grade level. SISCVS will make arrangements with students to take the test at a location near them.

The EL program will be reviewed annually based on local and state data of English Learners and the general student population and other overlapping subgroups such as special education and free and reduced lunch eligible students. The annual review will include looking at data regarding equitable representation, academic achievement, elementary and secondary programming, professional learning and teacher capacity, family engagement, and resource allocation.

Language Instruction Educational Programs are plans for supporting students who qualify as English learners. The descriptions below provide a general overview of common interventions.

- **Transitional Bilingual Students** are taught core content and language fluency in their native language for varying periods of the day with the remainder of time focused on English language acquisition. The goal is to transition students to native English instruction within two to five years with no loss of content instruction. Classes may be self-contained or combined.
- **Dual Language or Two-way Immersion** Students are taught content and language fluency in two languages. The goal is fluency in two languages, and programs can last the duration of enrollment.
- **English as a Second Language (ESL) or English Language Development (ELD)** Students are provided supplemental individual or small-group instruction outside the general education classroom (e.g., "pullout" or ESL classes) with no native language support in either setting. Supplemental instruction can target language fluency and core content. The goal is to increase student success in mainstream, non-ESL supported general education classes which ELs should transition to in a reasonable amount of time.
- **Newcomer Programs** Students new to the U.S. are placed in classes that primarily emphasize English language acquisition. Instruction can be in English or can utilize a student's native language through a translation application. The goal is to move the student toward English language proficiency as quickly as possible.
- **Content Classes with Integrated ESL Support** Students are provided core content instruction with no native language support in mainstream classes utilizing integrated ESL strategies (i.e., teachers trained in EL methods, use of EL paraprofessionals, etc.).

The goal is to provide appropriate EL support in the general education classroom to the level appropriate for student success.

Limited English Proficient Parents

Notification of Language Assistance Services: Any parent who is limited in speaking, writing, or reading English may request the school to provide access to services such as interpreters and/or translated documents.

Gifted and Talented program

St. Isidore of Seville Catholic Virtual School will recognize and serve those enrolled students who qualify for the Gifted and Talented program at St. Isidore of Seville Catholic Virtual School in accordance with Oklahoma Regulations and Program Approval Standards for Gifted and Talented. (210:15-23-1 Oklahoma Regulations and Program Approval Standards for Gifted and Talented. [Rules and Regulations](#))

Students will be identified as gifted and talented through a process consistent with 70 O.S. 1210.301 for the purpose of funding through the gifted educational child count. This process will be nondiscriminatory with respect to race, economic background, national origin or handicapping condition. Parents will be involved in the process the entire time and will have the right to appeal a decision to the SISVCS Board. Either parents or teachers may recommend a student for the program. Students will be assessed utilizing a nationally standardized test of intellectual ability such as the IOWA Assessments or Terra Nova. Students who score in the top three percent (3%) on any nationally standardized test of intellectual ability means a composite, total or full-scale score in the 97th percentile or above, including the standard error of measure as denoted in each nationally standardized test of intellectual ability technical manual, will be nominated the program. Teacher recommendation, student work ethic, and other assessments, may also be considered in addition to the standardized test. (210:15-23-1.2 Oklahoma Regulations and Program Approval Standards for Gifted and Talented. ([Rules and Regulations](#)))

Gifted learners may benefit from individualized programming options to ensure appropriate challenge and engagement. SISCVS offers a variety of options to serve gifted and talented students:

- a) Flexible Pacing- based on course availability and the student services team approval, and/or teacher at the elementary and middle school levels
- b) Individualized Instruction
- c) Ongoing Assessment with MAP, Riverside Insights, and/or Beacon, national standardized testing for longitudinal growth data
- d) Proficiency-Based Promotion with qualifying assessment and progress depending on course availability and student services team approval
- e) Creative/Academic Competition through the OSSAA, Archdiocese of Oklahoma City, Diocese of Tulsa, online competitions
 - 1) American Mathematical Competitions
 - 2) Archdiocesan Spelling Bee, STREAM EXPO, History Fair
 - 3) Clean Tech Competition
 - 4) Destination Imagination

- 5) Discovery Education 3M Young Scientist Challenge
 - 6) eCyberMission
 - 7) Kids Philosophy Slam
 - 8) MathCounts
 - 9) Meridian Stories
 - 10) MIT THINK Scholars
 - 11) National Academic Championship
 - 12) National Academic League
 - 13) Science Olympiad
- f) Concurrent enrollment opportunities in high school
- g) Honors classes in high school

Through the placement process, these learners will be provided the most appropriate curriculum, pacing and instructional methodology. Teachers will receive in-service opportunities and CE credit for college coursework for training in order to work with students in areas of need, interest, and ability as related to their gifted and talented designation. Teachers will work closely with the parent/guardian and the St. Isidore of Seville Catholic Virtual School Student Services team to ensure a steady flow of enrichment activities for students working above grade level and/or within a special interest. Students will further benefit from the advantages of virtual gifted education as they will be able to work at their own pace without the restraints of traditional school classroom pacing. Records of placement decisions and data on all nominated students will be kept on file for a minimum of five years or for as long as needed for educational decisions, while providing strict confidentiality procedures. These records must include, but are not limited to: parent's written permission to test for individual assessments, written parental approval of program placement decisions, a procedure for parents to appeal placement or non-placement decisions (GEP), and individual student test composite score report (210:15-23-2e,f Oklahoma Regulations and Program Approval Standards for Gifted and Talented. [Rules and Regulations](#)).

Evaluation of the appropriateness of students' placement in gifted programming shall be ongoing, and written policies for removal from programming must include a procedure for conferencing with parents relative to any change in placement (210:15-23-2f Oklahoma Regulations and Program Approval Standards for Gifted and Talented. [Rules and Regulations](#)).

Neurodiverse Learners- Dyslexia, Dysgraphia, Dyscalculia

According to the statistics below taken from the National Center for Education Statistics website, the most common form of disability falls in areas of specific learning disability.

"15% of students fell into an IDEA category and of that group, 33% had a specific learning disability. A specific learning disability is a disorder in one or more of the basic psychological processes involved in understanding or using spoken or written language that may manifest itself in an imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations. Thirty-three percent of all students who received special education services had specific learning disabilities, 19 percent had speech or language impairments,² and 15 percent had other health impairments (including having limited strength, vitality, or alertness due to chronic or acute health problems such as a heart condition, tuberculosis, rheumatic fever, nephritis, asthma, sickle cell anemia, hemophilia, epilepsy, lead poisoning, leukemia, or diabetes). Students with autism, developmental delays, intellectual disabilities, and emotional

disturbances each accounted for between 5 and 12 percent of students served under IDEA. Students with multiple disabilities, hearing impairments, orthopedic impairments, visual impairments, traumatic brain injuries, and deaf-blindness each accounted for 2 percent or less of those served under IDEA.” [COE - Students With Disabilities \(ed.gov\)](#)

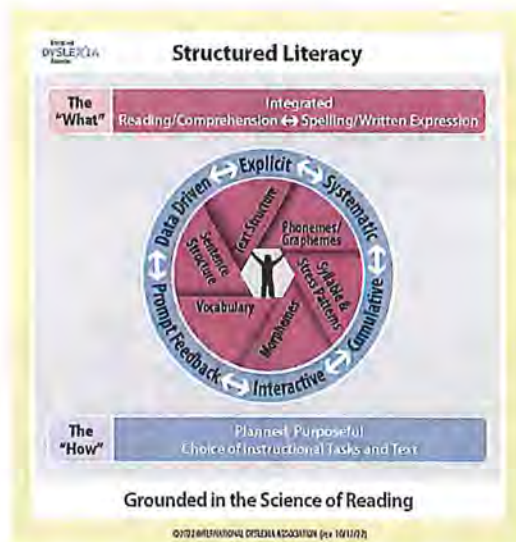
“In fall 2020, the percentage of students served under IDEA who spent 80 percent or more of the school day in general classes was highest for students with speech or language impairments (88 percent). Approximately two-thirds to three-quarters of students with specific learning disabilities (75 percent), developmental delays (69 percent), other health impairments (69 percent), and visual impairments (69 percent) spent 80 percent or more of the school day in general classes. Less than one-third of students with deaf-blindness (28 percent), intellectual disabilities (19 percent), and multiple disabilities (15 percent) spent 80 percent or more of the school day in general classes.” [COE - Students with Disabilities \(ed.gov\)](#)

Reading ability affects every subject taught in school. Catholic schools address this on a regular basis by utilizing strong research-based programs incorporating strong early literacy, phonics, and writing based elements. In reviewing the reading proficiency for all Oklahoma students taking any reading assessment, the 2021-22 proficiency rate is 27.19%. This appears to be an area that St. Isidore of Seville Catholic Virtual School could help in the overall education of Oklahoma children by utilizing the Orton Gillingham approach to reading which addresses the five pillars of reading: Phonemic Awareness, Phonics, Fluency, Vocabulary and Comprehension. Training teachers for the expectation of having these common learning differences and addressing them with strong training programs is the intent of St. Isidore of Seville Catholic Virtual School. ([Orton-Gillingham | The Orton-Gillingham Approach,2023](#))

Teacher training in the Science of Reading will be conducted through participation in various programs that are approved through the administration of the school and the Archdiocese of Oklahoma City. Programs used for training will meet the Knowledge and Practice Standards for Teacher of Reading as presented by the International Dyslexia Association. ([FINAL KPS FOR PUBLICATION May2018.pdf | Powered by Box.](#))

Examples of approved programs would be:

- 1) Payne Education Center: Certification Program for Dyslexia Specialist
- 2) Lindamood Bell: LiPs, Seeing Stars, Visualization and Verbalization, Cloud 9
- 3) Neihaus Institute: Neuhaus’ structured literacy curriculum, Concepts in Literacy, - Certification Program
- 4) Wilson Foundations
- 5) S.P.I.R.E.:
- 6) Literary First by Catapult: [Program Info](#)- This is not a certification program
- 7) LETRS: Language Essentials for Teachers of Reading and Spelling



The fundamental training in the Structure of Literacy grounded in the Science of Reading is crucial. These components can be found in this image from the International Dyslexia Association [Structured Literacy Roadmap](#) (2022)

At-risk/Academically Behind Learners

According to the Oklahoma Department of Education, Oklahoma children rank 5th in the nation for Adverse Childhood Experiences. Nearly half of all Oklahoma students have an

ACE score of 2 or higher, compared to less than 40% nationwide. More than half of all students in the state are at an economic disadvantage, with 56% of the population in poverty. Over 23 thousand students are homeless, 2,505 students come from foster care, and 199 are labeled as migrants. Over 11% of Oklahoma students have incarcerated parents, compared to just over 7% nationwide. ([sde.ok.gov. Fast Facts,2022](#))

According to the American Psychological Association, all of these factors, and especially socio-economic status (SES) impacts quality of life, mental and physical health, as well as academic readiness and success. In fact, research tells us that a student's SES is "a statistically significant and strong predictor of learning-related behavior problems" and that these same children enter school with "fewer reading or mathematics skills and less well- developed learning-related behaviors" (Morgan, 2011). According to Aikens & Barbarin (2008), the schools in low- SES communities may not have the necessary resources, and as such, the academic growth of students is impacted. Upon entrance to high school, research has also found that low-SES students enter with as much as a 5- year gap in literacy skills compared to their peers (Reardon, Valentino, Kalogrides, Shores, & Greenberg, 2013).

Virtual schools have an opportunity to serve more at-risk students, and St. Isidore of Seville Catholic Virtual School meets this challenge head-on by providing the flexibility of pacing and schedule to meet their needs. The Changing Landscape of K-12 Education in the US states that virtual schooling is an effective tool for "providing at-risk students with additional remediation," as well as "verifying whether or not they are accessing those materials regularly and effectively." Using the SISCVS system, Oklahoma certified teachers will be able to do just that- deliver a remarkably individualized instruction customized to the student's needs in real time.

Co-curricular and extracurricular activities

Description

Extra or co-curricular activities will be provided by teachers in partnership with parents every school year, yet the frequency will increase after the first year of operating. These may include educational

field trips and school community social events that allow students and families to come together. Examples of such events might be ice cream socials, roller skating, museum field trips, sporting events, etc. These events are to hold at least one biannual event in each quadrant of the state in the first year. As the school grows in enrollment and staff, the frequency of field trips will increase with a goal of one per month in each of the largest population hubs around the state.

Delivery

School Clubs, NHS, NJHS and Ceremonies:

Interaction on a personal level outside of academic courses is very important for students. St. Isidore of Seville Catholic Virtual School administration and staff will support the creation of school clubs so students can engage with each other and pursue their individual interests in person. Some examples include an art club, chess club, yearbook, math, coding, and gaming club. The school will apply for a chapter of the National Honor Society and National Junior Honor Society so exceptional student scholars will be recognized. St. Isidore of Seville Catholic Virtual School will host in-person baccalaureate with award recognition and graduation ceremonies including caps/gowns for students.

Funding

There will be some shared costs for extra or co-curricular activities. Parents will pay their student's entrance fees for access to museums, applicable educational events such as movies, museum visits, field trip admission to parks, and drinks and snacks etc. Parents will attend all school sponsored events and provide transportation for their student. St. Isidore of Seville Catholic Virtual School will also offer field trips to in-state colleges and universities for high school students to explore and prepare for post-secondary learning. Teachers may collaborate with a local business to explore career options.

Student performance

Student performance will be tracked using the methods prescribed in the assessment plan, outlined in this application. In addition, the school will be held accountable to these internal student performance-based goals.

Performance Measure	Goal
Achievement	Aspirational: St. Isidore of Seville Catholic Virtual School will meet or exceed the statewide average for student proficiency in Math and ELA for elementary, middle, and high school grades. Each year, the school will strive for a 1-2 % improvement from the prior year. Lowest: The first year of operation will provide baseline data for proficiency rates in Math and ELA. Each year, the school will strive for a 1-2% improvement from the prior year. By Year 4, student proficiency in Math and ELA will meet or exceed the statewide average.
Growth	Aspirational: St. Isidore of Seville Catholic Virtual School will earn a higher student progress score than the statewide average in all grade bands served by year 3. Lowest: By Year 5, St. Isidore of Seville Catholic Virtual School will meet the statewide average rating for Student Progress for all grade bands.

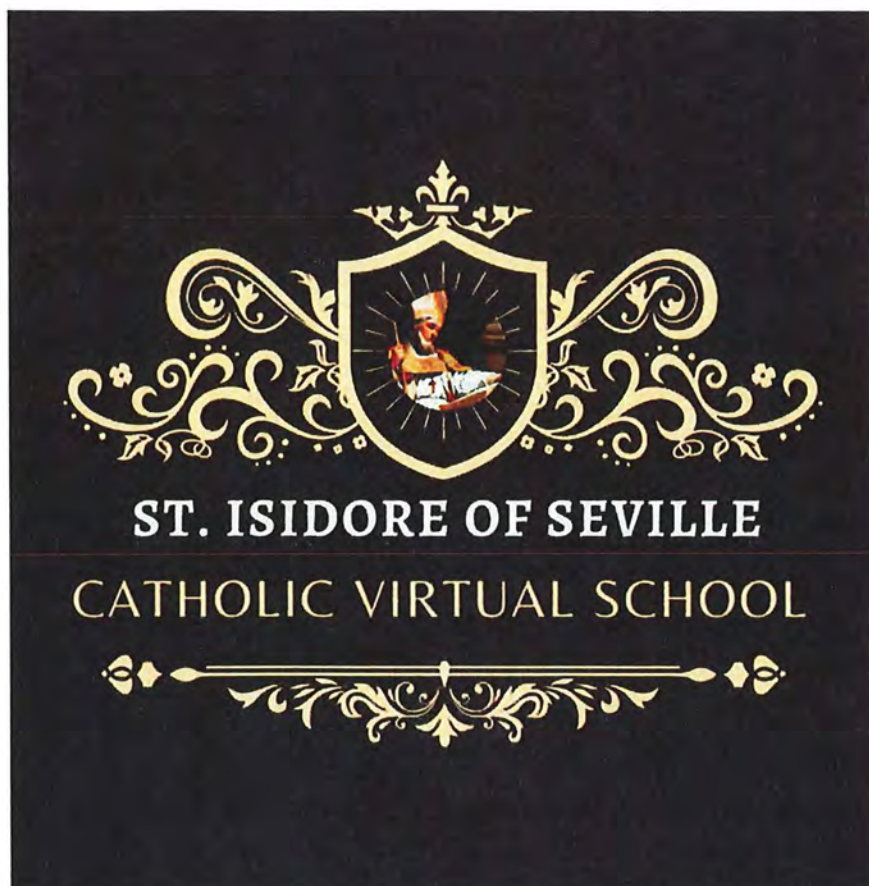
Re-enrollment	Aspirational: 65% of current students will reenroll each year, based on a fall-to- fall roster Lowest: 50% of current students will reenroll, based on a fall-to-fall roster.
Attendance	Aspirational: St. Isidore of Seville Catholic Virtual School will meet or exceed an 65 % attendance rate for each year of the charter. Lowest: St. Isidore of Seville Catholic Virtual School will meet the statewide average for student attendance rate across all grade levels.
Course Passing Rates	Aspirational: In the first year, St. Isidore of Seville Catholic Virtual School will have a course passing rate of 75% or higher for each grade band. Each year the school will strive for 2% improvement. Lowest: In the first year, St. Isidore of Seville Catholic Virtual School will have a course passing rate of 50% or higher for each grade band. Each year the school will strive for 2% improvement.

School culture

The culture of a school is largely driven and determined by its school leadership. The Principal/Director will be a leader who understands and respects the complexity of virtual learning and who supports the school's teachers both professionally and personally. The Board, in consultation with both dioceses will be looking for a school leader who can build relationships with his or her students, teachers, parents, and the Board of Directors. This is a leader who demonstrates a servant minded leadership and leads by example, by modeling, and empowering those around them.

Communication is a critical factor that influences the climate and culture of every organization. To communicate in a virtual school environment requires an understanding of the audience and the information you are communicating. The goal for the school leaders and teachers is to prioritize the lines of communication between the students and parents that go beyond the technology being used to teach. Examples include personal notes mailed, phone calls after school hours, community events with students and families and even home visits. St. Isidore of Seville Catholic Virtual School will promote a commitment to serving families for the best educational experience for their child.

The Board of Directors and both dioceses have an expectation of accountability for all involved in supporting student success- the administration, teachers, support staff, parents/guardians, and students.



Section 10: Growth Plan

Section 10: Growth Plan

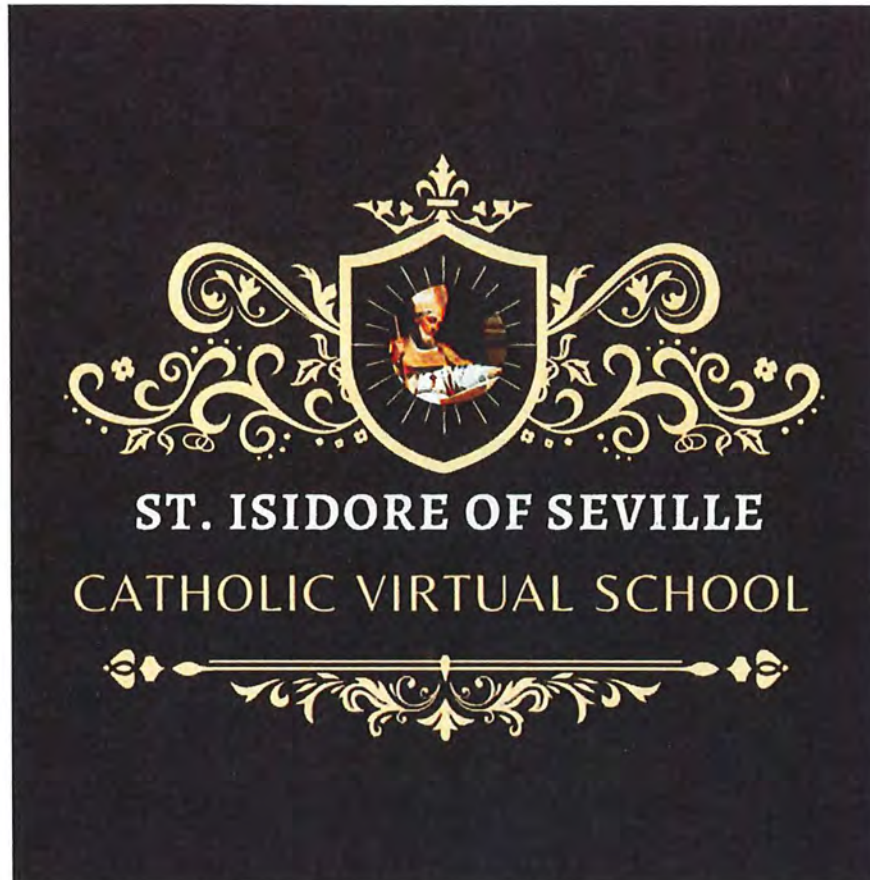
Include a concise plan detailing expected school growth and describing how the school will evolve to meet the needs of school growth

St. Isidore of Seville Catholic Virtual School will use a smart growth strategy by starting the school with a smaller student census, with a plan for incremental student growth rates of 250 students per year in year 3-5. This allows the school to be more responsive to students and not become overwhelmed with sudden growth. This is deliberate and a result of lessons learned and observed from other virtual schools in Oklahoma and throughout the nation. Class sizes will be conducive to ensuring teacher-student engagement and promote the various methods of instruction. Teachers will be provided with upfront and ongoing professional development to ensure effective management of synchronous and asynchronous instruction. The school will self-cap at 1500 by year five and additional feasibility will be studied.

Include an outline of criteria designed to measure effectiveness of the school

In addition to the performance-based academic goals outlined above, the St. Isidore of Seville Catholic Virtual School will also measure itself against these mission specific and standards-based goals:

Performance Measure	Goal
Parent Satisfaction Ratings	Aspirational: St. Isidore of Seville Catholic Virtual School will earn an 75% or higher on the annual school satisfaction surveys as measured by parents/guardians from all grade levels saying the school meets or exceeds their overall expectations. Lowest: St. Isidore of Seville Catholic Virtual School will earn a 50% or higher on the annual school satisfaction surveys as measured by parents/guardians from all grade levels saying the school meets or exceeds their overall expectations.
College and Career Readiness	Aspirational: 50% of St. Isidore of Seville Catholic Virtual School will be accepted to one or more post-secondary options (2 or 4 year college, skilled trades or other vocational school, military service, and/or join the workforce) Based on students' post- graduation plans data. Lowest: 35% of St. Isidore of Seville Catholic Virtual School graduates will be accepted to one or more post- secondary options (2- or 4-year college, skilled trades or other vocational school, military service, and/or join the workforce) Based on students' postgraduation plans data.



Section 11: Archdiocesan Charter History

Section 11: Charter History.

Has the applicant applied for authorization in other states?

The applicant has not applied for authorization in other states.

To what states and authorizers?

Not applicable

What was the result?

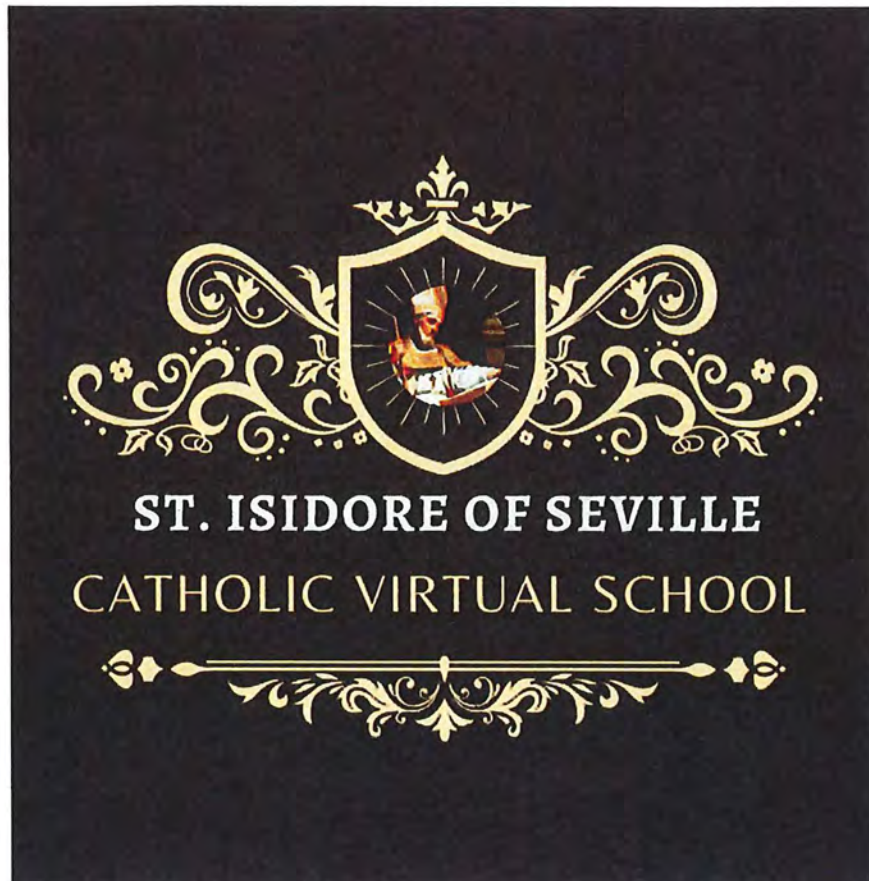
Not applicable

Has the service provider(s) provided charter school services in other states?

The service provider has not provided charter school services in other states

What is the applicant's relationship with the service provider(s)?

The applicant and service provider are one and the same. The school falls under the umbrella of the Oklahoma Catholic Conference comprised of the Archdiocese of Oklahoma City and the Diocese of Tulsa. The Archdiocese of Oklahoma City and the Diocese of Tulsa will act as consultants for the school administration and will direct on diocesan policies that apply to the school.



Section 12: Statements of Assurances

Section 12. Statements of Assurance

Include with the application signed and notarized statements of recognition and agreement by the governing body members to:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.
2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);
3. Guarantees access to education and equity for all eligible students regardless of their race ethnicity, economic status, academic ability, or other factors subject to the provisions in Paragraph 1 above;
4. Guarantees to establish the components necessary to begin school operations in the State of Oklahoma on July 1 of the first year;
5. Secures and occupies a school administration facility;
6. Purchases and implements a state-approved school financial system;
7. Purchases and implements state-approved student information system; and
8. Secures connectivity to state reporting

Please find statements of recognition and assurances included with Appendix F.

STATEMENT OF
ASSURANCES

The undersigned, Lara Schuler, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);

3. Guarantees access to education and equity for all eligible students regardless of their race ethnicity, economic status, academic ability, or other factors subject to the provisions in Paragraph 1 above;

4. Guarantees to establish the components necessary to begin school operations in the State of Oklahoma on July 1 of the first year;

5. Secures and occupies a school administration facility;

6. Purchases and implements a state-approved school financial system;

7. Purchases and implements state-approved student information system; and

8. Secures connectivity to state reporting

systems. EXECUTED this 27 day of January

2023.

Lara Schuler

(name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of Oklahoma

County of Oklahoma

The foregoing instrument was acknowledged before me on 1/27/23 (date) by Lara Schuler
(name(s) of person(s)).

(Seal, if any)



Rosemary G. Lewis

Signature of Notarial Officer

Notary Public

Title (and Rank)

My commission expires: Jan. 26, 2022

**STATEMENT OF
ASSURANCES**

The undersigned, Michael Scaperlanda, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);

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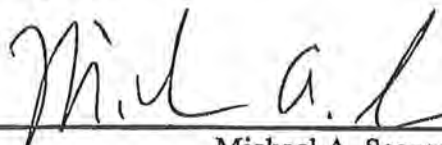
6. Purchases and implements a state-approved school financial system;

7. Purchases and implements state-approved student information system; and

8. Secures connectivity to state reporting

systems. EXECUTED this 27th day of January

2023.



Michael A. Scaperlanda

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of Oklahoma

County of Oklahoma

The foregoing instrument was acknowledged before me on 1/27/23 (date) by Michael A. Scaperlanda
(name(s) of person(s)).

(Seal, if any)



Rosemary G. Lewis

Signature of Notarial Officer

Notary Public

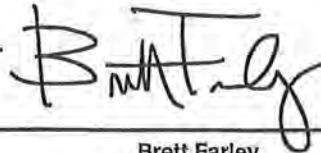
Title (and Rank)

My commission expires: Jan. 22, 2026

**STATEMENT OF
ASSURANCES**

The undersigned, Brett Farley, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.
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 5. Secures and occupies a school administration facility;
 6. Purchases and implements a state-approved school financial system;
 7. Purchases and implements state-approved student information system; and
 8. Secures connectivity to state reporting
- systems. EXECUTED this 27th day of January 2023.



Brett Farley

(name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

**STATEMENT OF
ASSURANCES**

The undersigned, **Den. Harrison H. Garlick**, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

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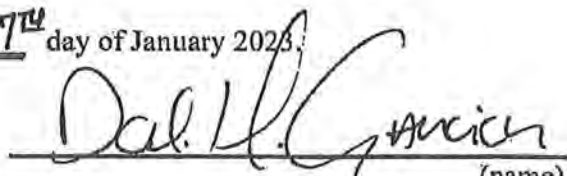
5. Secures and occupies a school administration facility;

6. Purchases and implements a state-approved school financial system;

7. Purchases and implements state-approved student information system; and

8. Secures connectivity to state reporting systems.

EXECUTED this 27th day of January 2023.


(name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of OKLAHOMA

County of TULSA

The foregoing instrument was acknowledged before me on 27/1/23 (date) by HARRISON GARLICK
(name(s) of person(s)).

(Seal, if any)

Mary E. McQuinn
Signature of Notarial Officer

My commission expires: 23 FEB 24



**STATEMENT OF
ASSURANCES**

The undersigned, Tamara Deane as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

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systems. EXECUTED this 27 day of January

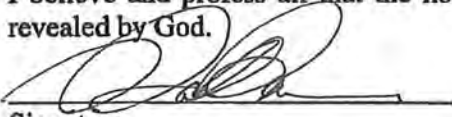
2023.



Exhibit A

Catholic Board of Directors – Statement of Faith Statement

I believe and profess all that the holy Catholic Church believes, teaches, and proclaims to be revealed by God.


Signature



Date

Exhibit B

Board of Directors – Commitment

I support the Statement of Faith attached as Exhibit A to the Bylaws of the Corporation, and I will not make any public statement or take any public position in conflict with or contrary to the Statement of Faith or the teachings of the Roman Catholic Church.


Signature


Date

(name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of OKLAHOMA

County of TULSA

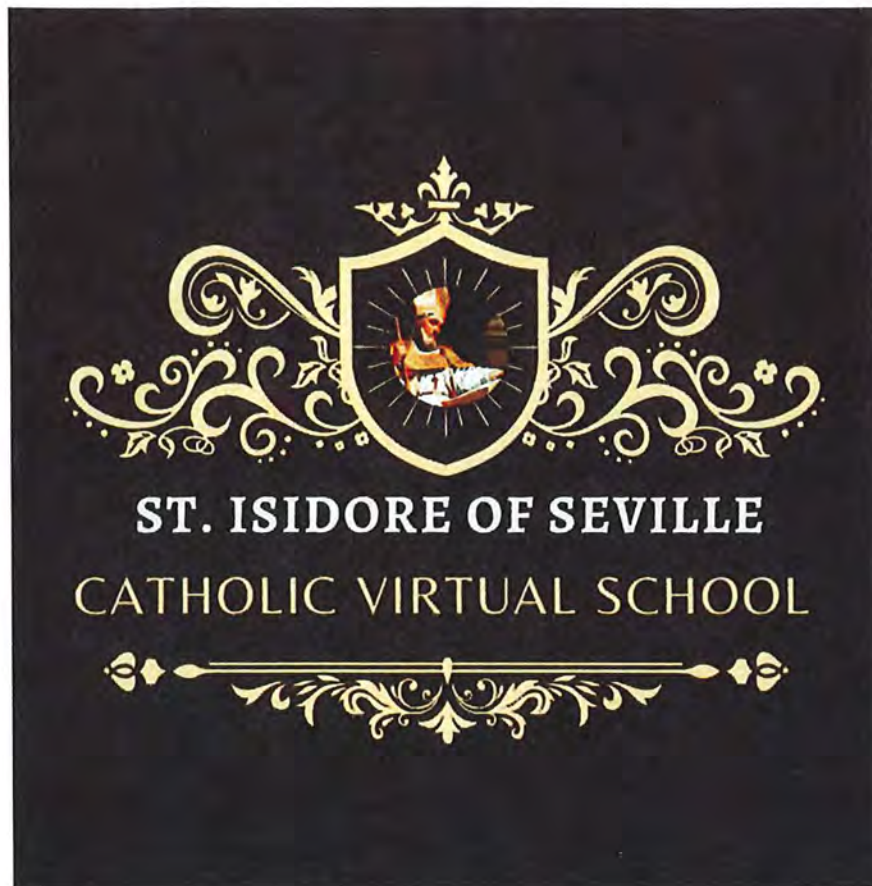
The foregoing instrument was acknowledged before me on 27 Jan 23 (date) by David Dean
(name(s) of person(s)).

(Seal, if any)

Mary E. McGilvray
Signature of Notarial Officer

My commission expires: 23 FEB 24





Section 13: Appendices

Appendix A: Virtual Charter School Training Certificate

Appendix B: Preopening Requirements Template

Appendix C: Archdiocese of Oklahoma City Catholic Schools Virtual Employee Handbook

Appendix D: Enrollment Charts

Appendix E: School Calendar

Appendix F: Governing Board Documents

Appendix G: Start-up Plan

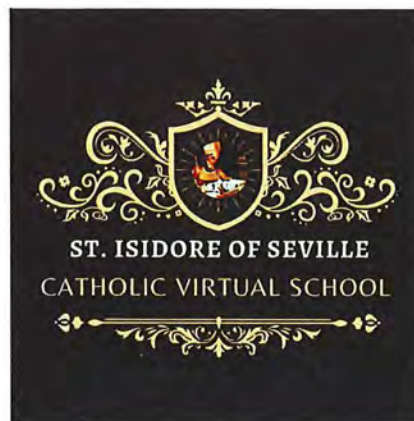
Appendix H: Budget Documents

Appendix I: Archdiocese of Oklahoma City Letter of Support

Appendix J: OCCSAA/ OPSAC Accreditation

Appendix K: Organization Chart

Appendix L: In-Year Professional Development Calendar



Section 13: Appendix A: Virtual Charter School Training Certificate

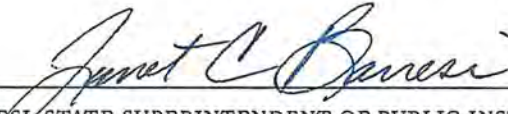
Office of State Superintendent

State of  Oklahoma

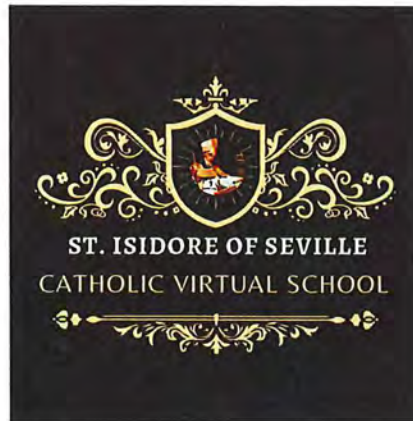
The State Superintendent of Public Instruction
expresses appreciation and congratulations to

Joe O'Connor

upon Successful Completion of **Charter School Training** for exemplified
excellence and commitment to academic achievement and student success,
and serves as a model for quality values and esteemed character in our
community and throughout the Great State of Oklahoma.


JANET BARRESI, STATE SUPERINTENDENT OF PUBLIC INSTRUCTION
OKLAHOMA STATE DEPARTMENT OF EDUCATION

APRIL 28, 2014



Section 13: Appendix B: Preopening Requirements Template

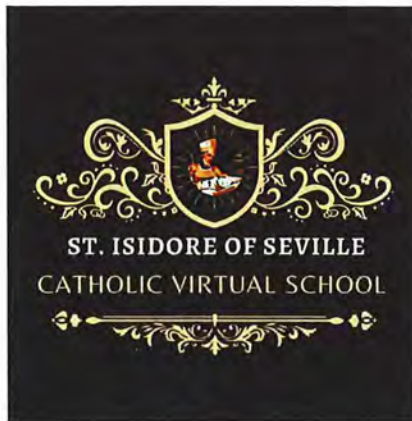
Name of Virtual Charter School: St. Isidore Catholic Virtual School				
Target School Opening Date: Fall 2024				
Date(s) of Requirements Review:				
Meeting Attendees:				
Pre-opening Requirements Essential Tasks Consistent with Application for authorization, Charter Contract, Oklahoma Statute and Regulations and Expected for Completion Prior to the Opening of the School	Task Target Date	In Progress	Completed	Notes
Foundation of the School Charter				
Develop and Approve Mission-Centered Planning		x		
Develop and Approve Key Elements of School Design and Performance Indicators		x		
Approve Access and Equity Policies and Establish Procedures		x		
Implement Community Support Plan		x		
Secure the following: <ul style="list-style-type: none"> • 501c3 • Incorporated Statutes • Approve By-Laws • Secure Federal Tax-Exempt Status • Non-Profit Requirements 	Upon Acceptance of Application			
Organizational Capacity				
Submit Charter Contract to SDE and Request School Site Codes(s)	Prior to Jan 30			
In accordance with 210:40-87-5, a charter school will be considered established when a charter school files charter documents with the State Department of Education and receives school codes. The following documents must be filed: <ul style="list-style-type: none"> • A copy of the sponsor's approved board minutes approving the charter school application; • A copy of the completed charter school application; • A copy of the approved contract for the new charter school; and • A letter addressed to the Office of Accreditation that includes the following: <ul style="list-style-type: none"> ○ A request for the school to be assigned a county code, district code, and site code; ○ The physical and mailing address of the charter school; ○ Contact information for the school administrator or a designee; ○ Grades served; and ○ The month and year the charter school will begin operation. 	Prior to Jan 30			
	Prior to Jan 30			
Pre-opening Requirements Essential Tasks Consistent with Application for authorization, Charter Contract, Oklahoma Statute and Regulations and Expected for Completion Prior to the Opening of the School	Task Target Date	In Progress	Completed	Notes

Develop Board Membership		x		
Provide Evidence of Board Member Residency		x		
Develop and Implement Board Training Plan: <ul style="list-style-type: none"> • Roles and Responsibilities • Ethics • Open Meeting Act • Open Records Act • School Finance • Academic Achievement • Meeting Schedule 	Upon Acceptance of Application			
Develop and Approve Job / Role Description for Board Officers and Members			x	
Select and Approve Board Officers			x	
Develop and Approve Board Protocols: <ul style="list-style-type: none"> • Agenda Format • Minutes Format • Opening Meeting Act Assurances • Calendar of Critical Topics for Consideration • Mechanism for Tracking Approved Policies 			x	
Develop and Approve School Organizational Design/Chart		x		
Develop and Approve Job Description for Head of School / Superintendent			x	
Pre-opening Requirements Essential Tasks Consistent with Application for authorization, Charter Contract, Oklahoma Statute and Regulations and Expected for Completion Prior to the Opening of the School	Task Target Date	In Progress	Completed	Notes
Select and Hire Head of School / Superintendent			x	
Develop and Approve Benchmarks for Head of School / Superintendent			x	
Develop and Approve Evaluation Process for Head of School / Superintendent			x	
Develop and Approve Contract for Head of School / Superintendent			x	
Develop and Approve Job Descriptions: <ul style="list-style-type: none"> • Administrative Staff • Teaching Staff • Support Staff 			x	
Develop and Approve Evaluation Processes: <ul style="list-style-type: none"> • Administrative Staff • Teaching Staff • Support Staff 			x	
Develop and Approve School Calendar			x	
Develop and Approve Student Handbook			x	

Develop and Approve Staff Handbook			x	
Develop and Approve Professional Development Plan		x		
Develop and Approve Policies/Procedures: <ul style="list-style-type: none"> • Student Recruitment • Admissions/Enrollment (including capacity and lottery) • Attendance • Promotion/Graduation • Student Conduct/Discipline • Safety/Emergency Response Plan • Student/Family Education and Engagement • Student Achievement Grading and Progress Reporting Policies and Procedures 			x	
Pre-opening Requirements Essential Tasks Consistent with Application for authorization, Charter Contract, Oklahoma Statute and Regulations and Expected for Completion Prior to the Opening of the School	Task Target Date	In Progress	Completed	Notes
Approve and Implement Technology Systems: <ul style="list-style-type: none"> • Establish Secure Connectivity to State Reporting Systems • Purchase and Implement State-Approved Student Information System • Purchase and implementation of State-Approved School Financial Reporting System 	Upon Acceptance of Application			
Approve and Implement Other Technology Systems		x		
Approve and Implement School Communication Systems. <ul style="list-style-type: none"> • Phone • Website • Other 	Upon Acceptance of Application	x		
Secure and Occupy Public Administration Facility			x	
Acquire: <ul style="list-style-type: none"> • Instructional Materials • Equipment • Furniture • Supplies 	Upon Acceptance of Application			
Financial Management				
Develop and Approve Roles and Responsibilities through Job Descriptions: <ul style="list-style-type: none"> • Treasurer • Encumbrance Clerk • Other Financial Officer(s) 		x		

Select and Hire: <ul style="list-style-type: none"> Treasurer Encumbrance Clerk Other Financial Officer(s) 	Upon Acceptance of Application			
Approve and Implement Financial Management Plan		x		
Approve and Implement Financial Process and Reporting Requirements			x	use archdiocesan financial process
Pre-opening Requirements Essential Tasks Consistent with Application for authorization, Charter Contract, Oklahoma Statute and Regulations and Expected for Completion Prior to the Opening of the School	Task Target Date	In Progress	Completed	Notes
Develop and Approve Budget		x		
Provide Verifiable Proof of Secured Funds to Support Budget		x		
Establish and Approve Public School Bank Account	Upon Acceptance of Application			
Develop and Approve Finance Policies: <ul style="list-style-type: none"> Fiscal Financial Controls, Including Financial Process and Reporting Requirements Audit Requirements Investments Other 		x		
Secure and Approve Insurance and other Risk Management Needs: <ul style="list-style-type: none"> Property Liability Other 	Upon Acceptance of Application			
Secure and Approve Required Bonds: <ul style="list-style-type: none"> Superintendent Treasurer Encumbrance Clerk Minutes Clerk Other Financial Officer(s) 	Upon Acceptance of Application			
Secure Connection of Accounting System to Oklahoma Cost Accounting System	Upon Acceptance of Application			
Develop and Approve Financial Process Forms (i.e., Purchase Orders, Expense Forms)		x		

Develop and Approve Personnel Policies and Procedures:			x	
<ul style="list-style-type: none"> Hiring Compensation Benefits Other 				
Pre-opening Requirements Essential Tasks Consistent with Application for authorization, Charter Contract, Oklahoma Statute and Regulations and Expected for Completion Prior to the Opening of the School	Task Target Date	In Progress	Completed	Notes
Develop and Submit Federal Programs Plan and Application	Upon Acceptance of Application			
Education Program and Performance				
Develop, Approve, and Implement Curriculum and Instructional Models			x	
Develop, Approve, and Implement Assessment Plan			x	
Develop, Approve, and Implement Diverse Learner Systems and Supports: <ul style="list-style-type: none"> Special Education English Language Learners At-Risk Students Gifted and Talented 		x		
Growth Plan				
Develop and Implement Growth Plan Enabling School to Meet the Needs of Potential Students		x		
Develop and Implement Strategies to meet the Mission and Key Elements of School Design Based on Performance Metrics		x		



Section 13: Appendix C: Archdiocese of Oklahoma City
Catholic Schools Virtual Employee Handbook



Archdiocese of Oklahoma City
Catholic School Employee Handbook
Prepared for



SY 2024-25

"The work of teachers [in Catholic schools] is in the real sense of the word an apostolate most suited to and necessary for our times and at once a true service offered to society."

Vatican II, Gravissimum Educationis, ¶18

"Catholic education is above all a question of communicating Christ, of helping to form Christ in the lives of others."

St. John Paul II, Message to the
National Catholic Educational Association of the U.S., 1979

Effective: 07/17/2019
Updated: 01/23/2023

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SECTION 100 INTRODUCTION

Catholic schools play an important role in the life of the Church, assisting parents in the integral human formation of the young by providing an education grounded in Truth, Beauty, and Goodness that allows the student to see the unity of all knowledge. The Vatican II document on education, *Gravissimum Educationis* states "a true education aims at the formation of the human person in the pursuit of [the person's] ultimate end and of the good of [society]." Therefore, "[t]he mission of the Catholic school is the integral formation of students, so that they may be true to their condition as Christ's disciples and as such work effectively for the evangelization of culture and for the common good of society." St. John Paul II.

By the "nobility of the task," Catholic teachers are called "in imitation of Christ, the only Teacher, [to] reveal the Christian message not only by word but also by every gesture of their behavior." The Sacred Congregation for Catholic Education, *The Catholic School* (1977). "[T]he special task of those educators who are lay persons is to offer to their students a concrete SISCVS of the fact that people deeply immersed in the world, living fully the same secular life as the vast majority of the human family, possess this same exalted dignity." The Sacred Congregation for Catholic Education, *Lay Catholics in Schools: Witnesses to Faith* (1982).

It is only in this construct, grounded in our faith tradition, that we offer an education. We believe students immersed in these truths will mature and matriculate into their communities well-grounded in their appreciation for themselves, their respect for others, and their relationship with God as Father, Son and Holy Spirit. Graduates formed in these truths and traditions make better individuals, better husbands and wives, better parents, better neighbors, better employees and better citizens.

People of other faiths or no faith are welcome to attend our Catholic schools. They will not be required to affirm our beliefs, but within our schools their experience will reflect the Catholic understanding of each person as created in the image and likeness of God, called to lives of holiness and service.

This Employee Handbook (Handbook), along with the Archdiocesan Code of Conduct, teacher contract, and other such documents, is provided to all employees as a reference to the benefits and conditions of employment in the Archdiocese of Oklahoma City (Archdiocese) and *St. Isidore of Seville Catholic Virtual School* (School).

101 Purpose of Employee Handbook

The purpose of this Handbook is to clarify and confirm the nature of the employment relationship that exists between employees and the School.

It is designed to acquaint employees with the School as an employer and to help employees work effectively and efficiently by explaining many of the policies, benefits, rules, regulations, rights and responsibilities of employment.

It is not exclusive or exhaustive. It is intended to help employees carry out their employment duties in a manner consistent with the teachings and traditions of the Roman Catholic Church. It is not intended to be a contract, expressed or implied, nor is it a guarantee of continued employment for any time period.

102 Handbook Revisions

This Handbook supersedes all previous versions of the Employee Handbook as well as other employment policies and procedures where inconsistent with this Handbook. The principal with the

approval of the superintendent may change, add, or delete any policy, portion, or procedure in this Handbook at any time, with or without notice, as deemed appropriate. Unless otherwise noted, future changes to this Handbook are effective when approved by the superintendent. Any changes to this Handbook will be distributed to all employees as soon as practical. Questions regarding this Handbook should be directed to the employee's supervisor.

103 Archdiocesan Vision and Mission

Archbishop's pastoral letters, "Go Make Disciples: A Vision for the Archdiocese of Oklahoma City (2013) (<https://d2wldr9tsuuj1b.cloudfront.net/20256/documents/2018/8/Go%20Make%20Disciples%20A%20Pastoral%20Letter.pdf>), and "Go Make Disciples! Building a Culture of Conversion and Discipleship" (2019) are incorporated herein by reference.

"Our fundamental vision to "go make disciples" has not changed. We are called to be disciples; called to pursue holiness and mission; called to become saints. We are still called to evangelize, to be witnesses, and to live authentic lives as missionary disciples. After five years, we have greater clarity and alignment in our mission.

Discipleship is a way of life! Like life itself, it is a journey filled with rich blessings and difficult challenges. Bearing good fruit over the course of this lifelong journey is our goal. The fruit we bear glorifies God. As we grow closer to Jesus Christ throughout our lives, we experience the full breadth of this journey with all its texture and depth.

I call on us as an archdiocese and as the Body of Christ to a renewed commitment to authentic discipleship. We give thanks for the abundant harvest that God has brought forth in our archdiocese. It is my prayer that we continue to advance in a direction that bears abundant fruit in the coming years, even "thirty, sixty and a hundredfold." I call you to be disciples and go make disciples! This is why we are here! This is our mission."

From "Go Make Disciples! Building a Culture of Conversion and Discipleship" Pastoral Letter of Most Reverend Paul S. Coakley, Archbishop of Oklahoma City, January 25, 2019.

104 Catholic Identity

As Catholics, we believe that all persons are called by God to contribute to the sanctification and transformation of the world, by fulfilling their own duties in the spirit and truth of the Gospel and Christian discipleship. The life and growth of the Church, and the spreading of the Gospel, depends upon the men and women St. Paul called "My co-workers in Christ Jesus." Each individual employee who works and ministers in the name of the Church, must therefore, stand before the world as a witness to the life and resurrection of the Lord Jesus. All employees are expected to adhere to and support the positions and beliefs of the Roman Catholic Church in the performance of their duties.

Employees who are Catholic are expected to be faithful to the Catholic Church and adhere to the teachings of the Church in their lives. Recognizing that non-Catholic employees are called to serve, they too are expected to have an understanding of the Catholic Church and to refrain from actions that are contrary to the teachings of the Church. Opportunities for staff education and development on the social and moral teachings of the Catholic Church will be made available. Opportunities are available for employees to participate in spiritual enrichment and education programs for their personal faith development.

All employees are to uphold the standards of the Catholic Church in their day-to-day work and personal lives. Employees are expected to be persons of integrity and must conduct themselves in an honest and open way, free from deception or corruption and in a manner consistent with the discipline and teachings of the Catholic Church. Employees are expected to follow rules of conduct that will protect the interests and safety of all, including the standards and policies set forth in the Archdiocesan Code of Conduct and other Archdiocesan and School policies and guidelines.

Every employee of a Catholic school is a minister of the Catholic faith by providing a living witness of Christ's love for school patrons and others, especially the children entrusted to the school's care by parents and guardians. Since God created the universe and orders all within it, a Catholic perspective permeates all subjects informing the student of the unity of all knowledge.

105 Employee Responsibility

It is every employee's responsibility to read this Handbook in its entirety to gain an understanding of employment practices within the Archdiocese and the School. Yearly, employees will be required to sign a document acknowledging that they have read, understand and will follow the Handbook.

106 School History

TBD

107 Core Values, Mission Statement, Goals and Objectives

Section 1.2 Purposes. The School is organized and will be operated exclusively for educational, charitable, and religious purposes. The School is an Oklahoma virtual charter school established pursuant to the Oklahoma Charter School Act, 70 O.S. § 3-130 et. seq. Subject to the foregoing and other limitations set forth in the Certificate of Incorporation, the School shall have and exercise all the powers of nonprofit corporations under Oklahoma law.

Without limiting the generality of the foregoing, to the extent permissible under the Oklahoma Charter Schools Act, the School's purposes, activities, programs, and affairs shall include the following:

- M. To create, establish, and operate the School as a Catholic School. "It is from its Catholic identity that the school derives its original characteristics and its 'structure' as a genuine instrument of the Church, a place of real and specific pastoral ministry. The Catholic school participates in the evangelizing mission of the Church and is the privileged environment in which Christian education is carried out. In this way 'Catholic schools are at once places of evangelization, of complete formation, of inculturation, of apprenticeship in a lively dialogue between young people of different religions and social backgrounds.'" Congregation for Catholic Education, *The Catholic School on the Threshold of the Third Millennium* ¶11 (1997).
- N. To operate a "school [that] sets out to be a school for the human person and of human persons. 'The person of each individual human being, in his or her material and spiritual needs, is at the heart of Christ's teaching: this is why the promotion of the human person is the goal of the Catholic school.'" Congregation for Catholic Education, *The Catholic School on the Threshold of the Third Millennium* ¶9 (1997). The heart of this mission "is oriented toward an integral formation of each

student.” Sacred Congregation for Catholic Education, Lay Catholics in Schools: Witnesses to Faith ¶28 (1982).

- O. To operate a school that understands “[t]he truth is that only in the mystery of the incarnate Word does the mystery of man take on light. ... [Christ] fully reveals man to man himself and makes his supreme calling clear.” Vatican II, Gaudium et Spes ¶22 (1965). The truth of the human person and the person’s ultimate destiny is learned and understood through faith and reason, theology and philosophy, including the study of the natural sciences. There is a “profound unity which allows [faith and reason] to stand in harmony ... without compromising their mutual autonomy.” St. John Paul II, Fides et Ratio ¶48 (1998).
- P. To operate a school that educates its students for freedom, understanding that “in order to be authentic, freedom must measure itself according to the truth of the person, the fullness of which is revealed in Christ, and lead to a liberation from all that denies his dignity preventing him from achieving his own good and that of others.” Congregation for Catholic Education, Consecrated Persons and Their Mission in Schools: Reflections and Guidelines, ¶37 (2022).
- Q. To assist and accompany parents in their obligation to educate their children. Code of Canon Law, Canons 793-806; Vatican II, Declaration on Christian Education ¶3 (1965). This obligation includes forming and cultivating students to
 - a. See and understand truth, beauty and goodness, and their author and source – God. Catechism of the Catholic Church ¶2500;
 - b. Know that among all creatures, the human person is the only one created in God’s image with the ability to know and love God, and that God created persons male and female. Catechism of the Catholic Church ¶355-379;
 - c. Know that because of sin humanity was separated from God, but in God’s love He has provided a path to salvation through the saving power of Christ, the second person of the Trinity, in His suffering, death and resurrection. *E.g.*, Catechism of the Catholic Church ¶651-655;
 - d. Know that in this earthly sojourn, each person is called to participate in Christ’s suffering and death by daily taking up their own cross and following Him. Catechism of the Catholic Church ¶618;
 - e. Know that human persons are destined for eternal life with the Holy Trinity, *e.g.*, Catechism of the Catholic Church ¶1720-1724, but that in freedom, an individual may reject God’s invitation and by this “definitive self-exclusion” end up in hell, Catechism of the Catholic Church ¶1033;
 - f. Engage in the lifelong task of forming one’s conscience to know good from evil and developing the will to do good and avoid evil, Catechism of the Catholic Church ¶1749-1794;
 - g. Develop habits of the intellect and will allowing one to live a virtuous life, Catechism of the Catholic Church ¶1784, 1803-1829; and

- h. Develop mind and body according to each student's ability so that the student may go into the world, participating in the transformation and development of society by the efforts of his or her labor, *Catechism of the Catholic Church* ¶1877-1889.
- R. To provide rigorous high-quality educational opportunities to prepare students for professional life. Vatican II, *Declaration on Christian Education* ¶5 (1965).
- S. To operate a school in harmony with faith and morals, including sexual morality, as taught and understood by the Magisterium of the Catholic Church based upon Holy Scripture and Sacred Tradition.
- T. To hire educators, administrators, and coaches as ministers committed to living and teaching Christ's truth as understood by the Magisterium of the Roman Catholic Church through actions and words, using their commitment to Christ and his teachings in character formation, discipline, and instruction, and to live this faith as a model for students.
- U. To contribute to the common good of society by 1) putting the Church at the service of the community in the realm of education, 2) providing an example of an education directed toward the whole person – body, mind, soul and spirit -while rejecting the idea of a partial education directed solely toward mind and body; 3) sharing with parents, the state, and other educational institutions the universally recognized obligation to educate the young; 4) its openness to accept students of all faiths or no faith who appreciate and desire a robust Catholic education; and 5) guaranteeing cultural and educational pluralism, providing families to educate their children according to the dictates of their consciences. Congregation for Catholic Education, *The Catholic School on the Threshold of the Third Millennium* ¶16 (1997).

SECTION 200 EMPLOYMENT

201 Compliance with State and Federal Laws

The School complies with all applicable state and federal laws and statutes to the extent the teachings of the Catholic Church allow.

202 At-Will Employment

Many employees of the School are employed “at-will,” which means that the terms of employment may be changed with or without notice, with or without cause, including, but not limited to termination, demotion, promotion, transfer, compensation, benefits, duties, and location of work. There is no agreement expressed or implied between the School and its employees for continuing or long-term employment. At-will employees may terminate employment with the School at any time, with or without notice, and with or without cause. Likewise, the School has the right to terminate employment of an at-will employee at any time, with or without notice, and with or without cause, so long as there is no applicable violation of federal, state, or local law.

Many teachers and school administrators are offered and accept contracts. To the extent that such contracts are consistent with this Handbook, the Code of Conduct, and other Archdiocesan policies and procedures, they are binding on the relationship between employer and employee. No employment contract carries with it an expectation of continued employment beyond the contract period, and there is no agreement expressed or implied between the School and these employees for continuing or long-term employment.

203 Nature of Employment Relationship

The policies and procedures set forth in the Handbook are not intended to create an express or implied contract of employment between the School and any of its employees, nor does acceptance of this Handbook imply that an employment contract for a specific duration exists between the School and the employee.

204 Hiring of Personnel

The School makes employment decisions based upon factors such as performance, abilities, talent, effort, credentials, education, and results. The School is committed to the utilization of the capabilities and productivity of all employees without unlawful consideration of personal characteristics.

205 Equal Employment Opportunity

The School is an Equal Opportunity Employer. The School complies with all applicable local, state, and federal laws and regulations governing fair employment practices that are not inconsistent with the faith or moral teaching of the Catholic Church. To the extent that local, state, and federal laws and regulations are inconsistent with the faith and moral teaching of the Catholic Church, the School claims a religious exemption to such laws pursuant to the First Amendment to the U.S. Constitution and other applicable local, state, and federal laws and regulations.

Recruitment, employment, transfer, promotion and administration of personnel policies will be done without regard to race, sex, color, national origin, citizenship, age, veteran status or mental or physical ability where the individual with a disability, with reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires. The School retains its right to consider religion as a factor in employment-related decisions.

206 Non-Discrimination on Basis of Disabilities

It is the policy of the School to comply with all applicable provisions of the Americans with Disabilities Act (ADA) and state law. This act protects "qualified" individuals who have (or are perceived to have) a physical or mental impairment that substantially limits one or more major life activities. To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, the School will make reasonable accommodations pursuant to federal and state law for the known physical or mental limitations of an otherwise qualified individual with a disability unless "undue hardship" as defined by federal or state law would result. Applicants or employees who require accommodations in order to perform the essential functions of the job should contact their immediate supervisor to request such an accommodation. Equal employment opportunity will be extended to qualified persons with disabilities in all aspects of the employer-employee relationship, including recruitment, hiring, training, promotion, transfer, discipline, reduction in force, and termination of employment.

207 Discrimination Complaints / Non-Retaliation

Any employee who believes that he/she has been subjected to any form of discrimination should immediately advise the appropriate supervisor, who will take the report and encourage the employee to make a written statement. The employee's statement should include the specific complaint, including the name(s) of the individual(s) involved, and the name(s) of witnesses, if any, so a meaningful response may be provided. Supervisors receiving discrimination complaints are required to notify the Superintendent of Catholic Schools (superintendent) and Archdiocesan Director of Human Resources within one working day.

A timely and thorough investigation will be conducted to attempt to resolve the situation. If it is determined that inappropriate conduct has occurred, effective remedial action will be taken commensurate with the severity of the offense. If an employee does not believe the supervisor has taken appropriate action, he/she is to contact the Archdiocesan Director of Human Resources directly. The Archdiocese strictly prohibits retaliation by management, employees or co-workers against an employee for filing a discrimination complaint. Every effort will be made to maintain confidentiality; however, in the course of the investigation some individuals may be involved on a "need-to-know" basis.

208 Service Animal

The Catholic Schools of the Archdiocese of Oklahoma City are committed to providing support for students or staff who require the assistance of a service animal to aid with their major daily living activities that are substantially limited by a physical or mental impairment. It is the intent of these procedures that Administration, Principal and school staff work in partnership with parents/guardians should a student or staff member with a disability require a service animal. However, there is no right of universal access to all service animals. The allowance of a service animal may be denied based upon an individualized, objective assessment of the associated hazards and risks. (*See infra* for a list of the main factors that will be included in such an assessment.)

Service Animal Defined by Title II and Title III of the ADA

A service animal means any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental

disability. Tasks performed can include, among other things, pulling a wheelchair, retrieving dropped items, alerting a person to a sound, reminding a person to take medication, or pressing an elevator button.

Emotional support animals, comfort animals, and therapy dogs are NOT service animals under Title II and Title III of the ADA.

Other species of animals, whether wild or domestic, trained or untrained, are not considered service animals either. The work or tasks performed by a service animal must be directly related to the individual's disability. It does not matter if a person has a note from a doctor that states that the person has a disability and needs to have the animal for emotional support. A doctor's letter does not turn an animal into a service animal.

Examples of animals that fit the ADA's definition of "service animal" because they have been specifically trained to perform a task for the person with a disability:

- Guide Dog or Seeing Eye® Dog¹ is a carefully trained dog that serves as a travel tool for persons who have severe visual impairments or are blind.
- Hearing or Signal Dog is a dog that has been trained to alert a person who has a significant hearing loss or is deaf when a sound occurs, such as a knock on the door.
- Psychiatric Service Dog is a dog that has been trained to perform tasks that assist individuals with disabilities to detect the onset of psychiatric episodes and lessen their effects. Tasks performed by psychiatric service animals may include reminding the handler to take medicine, providing safety checks or room searches, or turning on lights for persons with Post Traumatic Stress Disorder, interrupting self-mutilation by persons with dissociative identity disorders, and keeping disoriented individuals from danger.
- SSigDOG (sensory signal dogs or social signal dog) is a dog trained to assist a person with autism. The dog alerts the handler to distracting repetitive movements common among those with autism, allowing the person to stop the movement (e.g., hand flapping).
- Seizure Response Dog is a dog trained to assist a person with a seizure disorder. How the dog serves the person depends on the person's needs. The dog may stand guard over the person during a seizure or the dog may go for help. A few dogs have learned to predict a seizure and warn the person in advance to sit down or move to a safe place.
- Diabetic Alert Dogs that are trained to alert diabetic owners in advance of low (hypoglycemia) or high (hyperglycemia) blood sugar events before they become dangerous.

Procedures:

Decisions regarding the implementation of the use of a service animal into the school environment are made on a case by case basis in consultation with all Stakeholders (e.g. Principal, Classroom teachers, and parents/guardians). A protocol will be developed at the school level to address the staff, student's, school's, and the service animal's needs. Issues to be addressed would include the responsibility for handling, toileting and clean up, feeding, and transportation of the service animal to and from school. The protocol will also address the integration of the animal into the school system, the education of the staff and student body as to the role and expectation of the service animal and balancing the needs of the student or staff seeking the use of the service animal and the needs of students or staff who have

animal hair allergies or who exhibit fears of animals. A service animal will be excluded if it is a breed of animal prohibited by law.

Responsibilities:

1. The provision of a certified professionally trained animal is the financial responsibility of the parents/guardians.
2. The provision of a fully trained animal handler is the financial responsibility of the parent if an animal handler is required.
3. The provision of all food, water, and waste clean-up/disposal materials is the responsibility of the parent/guardians.
4. The immunization of the animal against diseases is the financial responsibility of the parent/guardians. Parents/guardians must provide to the Board/school proof that the personal assistant animal's vaccinations are current.
5. The parents/guardians will provide the school with up-to-date vaccination and health records.

The school can require the removal of the service animal if the animal is out of control and the animal's handler does not take effective action to control it, the animal is not housebroken, or the presence of the animal poses a direct threat to the health or safety of others. A non-exhaustive list of factors that may be considered under this element are that the service animal:

- is unclean, not well-groomed or has an offensive odor.
- urinates or defecates in inappropriate locations.
- solicits attention, visits or annoys students or school personnel.
- vocalizes unnecessarily; i.e., barking, growling, or whining.
- shows aggression towards people or other animals.
- solicits or steal food or other items from the students or school personnel.
- interferes with the educational program of any student.

If the service animal is removed, the individual with a disability shall be provided with the opportunity to participate in the service, program, or activity without the service animal.

The owner or handler of the service animal is responsible for any damage to school property or injury to personnel, students, or others caused by the animal.

209 Confidentiality / Right to Privacy

Information obtained in the course of employment (that is not generally available to the public) is considered confidential and should not be disclosed to anyone who does not have an actual "need-to-know." Access, authorized or not, does not confer any right to disclose information. The confidentiality policy is motivated by concern and respect for an individual's right to privacy. The School acts to protect the privacy of information about employees, students, and volunteers to the best of its ability, in accordance with prevailing legal requirements.

210 Immigration Law Compliance

It is the policy of the School to hire only those individuals who are and continue to be eligible to work in the United States. All new employees must, as a condition of employment, provide proof of identity and eligibility to work in the United States and comply with all archdiocesan policies, and federal rules and

regulations. Upon employment each employee is required to complete a U.S. Immigration and Naturalization Form (I-9) to verify eligibility for employment in the United States.

211 Pre-Employment Reference Checks

Pursuant to the requirements of the Safe Environment policy of the Archdiocese, three references will be checked on all prospective employees. A written record of all reference checks will be maintained in the personnel file of each employee. The School will honor the request of referents regarding confidentiality, and employees will not have access to the written record of reference checks. A written release (given on the application for employment) will be obtained from the applicant prior to checking references. If written references are provided, additional clarification may be sought via personal or telephone interviews upon completion of a signed release from the applicant.

212 Credential Review and Verification

The candidate, at the time of application, is responsible for making available to the School verification of education and professional licenses and certifications, as well as a copy of their current driver's license and car insurance verification where it is an occupational requirement.

It is the teacher's responsibility to maintain a current license/certification for the area he/she is teaching. The latest certification must be submitted to the principal.

213 Employment Forms

Prior to employment, the applicant must complete the background check form required by the Archdiocese as well as forms required by licensing or accrediting agencies. Failure to complete the requisite forms may result in disqualification or termination of employment. Falsification of information on the application or other employment forms is grounds for immediate termination or disqualification from employment consideration.

214 Criminal Background Reports

Criminal background checks are required and will be run on all prospective employees and volunteers of the School. Persons convicted of crimes, including but not limited to, crimes against children or other vulnerable populations, crimes of violence, use of weapons, illegal possession of weapons, distribution of illegal drugs, or alcohol or drug related convictions may not be hired as employees or approved for volunteer service.

Employees and volunteers have a duty to self-report arrests or convictions occurring after the initial criminal background check for crimes, including but not limited to, crimes against children or other vulnerable populations, crimes of violence, use of weapons, illegal possession of weapons, distribution of illegal drugs, or alcohol or drug related convictions. Failure to self-report in and of itself is grounds for discipline, including termination of employment or discontinuance as a volunteer.

The Archdiocese automatically runs criminal background checks every three years on current employees and volunteers without notification to them. If the new background check indicates that an employee or volunteer has been convicted of crimes against children or other vulnerable populations, crimes of violence, use of weapons, illegal possession of weapons, illegal distribution of drugs, or alcohol or drug related crimes, the conviction or the failure to disclose such conviction will be grounds for discipline, including termination of employment or volunteer service.

215 Employment of Relatives / Nepotism

In the interest of maintaining the professionalism and integrity of relationships among staff and others, any situations in which actual or perceived conflicts of interest may exist are to be avoided. Therefore, the School will attempt to refrain from any assignments of relatives or others that may potentially lead to problems of supervision, safety, security, conflict of interest, or employee morale. For the purpose of this policy, relatives include spouses, children, parents, in-laws, grandparents, grandchildren, siblings, aunts/uncles, nieces/nephews, cousins, and step relationships. The policy is not limited exclusively to relatives and it also applies to other situations or personal relationships, including living in the same household, in which the School, in its sole discretion, believes may result in an actual or perceived nepotism or conflict of interest.

The School reserves the right to take whatever action it deems appropriate where it believes such a situation exists, including transfer, reassignment, or termination of employment. All situations involving the employment of related persons are to be approved in advance by the Archdiocesan Director of Human Resources; under no circumstances can an offer of employment be extended by a relative to a related party as defined above. This Policy does not apply to temporary positions. Any questions regarding nepotism should be directed to the principal or Archdiocesan Director of Human Resources.

216 Employment of Minors

The School fully complies with the child labor provisions of the Fair Labor Standards Act and applicable state law which govern the employment of minors. The school will not employ youths younger than age 16.

217 Probationary Period

Per the Lay Teacher Contract during the first three (3) months of employment, the new employee is in a probationary period. The purpose of this period is to allow the employer to evaluate the employee's performance and to provide an opportunity for the employee to assess whether the School provides a suitable setting for his/her professional interests.

Notwithstanding during the probationary period, employees may terminate employment with the School at any time, with or without notice, and with or without cause. Likewise, the School has the right to terminate employment at any time with or without notice, and with or without cause.

If the School determines that the probationary period is not enough to allow a thorough evaluation of the employee's performance, the probationary period may be extended by the supervisor for a specified period.

218 Posting of Employment Opportunities

When practical, employment opportunities may be posted internally and on the Archdiocesan website or newspaper.

219 Verification of Employment

It is the policy of the School to verify only dates of employment and position held. Any request for salary information must be in writing with the employee's signed authorization to release such information.

220 Rehire

Former employees may be considered for rehire if the employee's record indicates good performance, behavior and attendance during their prior employment and if their termination/resignation occurred under favorable circumstances.

If an employee has terminated his/her employment with the School and is rehired, and the duration of the separation is fewer than 60 days, the employee shall retain his/her original anniversary date, and the accrual rate for vacation and sick leave (if applicable) will remain at the rate in effect upon termination of employment. Employees rehired after a separation in excess of 60 days will establish a new anniversary and benefit-eligibility date unless the separation was an approved leave of fewer than 120 days. Exceptions to this policy requires the approval of the Archdiocesan Director of Human Resources.

221 Approval for Rehire

All transfers or rehires at a new location requires the advance approval of the superintendent.

222 Outside Employment

Employment by the School generally does not prevent employees from engaging in additional lawful employment or volunteer service. However, an employee may not engage in any employment or volunteer activity that would result in a conflict of interest with the employee's position or the policies of the Archdiocese or School; that would in any manner bring disrepute upon the Church; constitute scandal, or otherwise conflict with the moral and theological teachings of the Catholic Church; or that detrimentally impacts the employee's job performance. Employees are asked to report any external employment and volunteer activity to their supervisor to determine whether a conflict of interest exists.

223 Conciliation Process (Grievance Process)

Communication builds community. Relationships can often suffer because people fail to communicate with each other. When problems occur between members of the school community, they should be solved as close to the source as possible. The School believes that work-related issues, questions, or complaints can best be resolved by frank and prompt discussion between the employee and supervisor. If an employee has a work-related issue that needs resolution, the employee should discuss the issue privately with his/her immediate supervisor. If, after discussion between the individuals involved, the conflict cannot be resolved, a meeting with the persons involved and the principal should be held. The principal will act as mediator. If these two steps fail to bring about a satisfactory resolution, the pastor will be asked to mediate. The superintendent, in consultation with the pastor, will be the final decision maker if all local attempts to reach a consensus fail.

Employees shall be able to address employment-related issues with administration without fear of retribution.

224 Personal Appearance

The School expects employees to have a professional appearance. The professionalism of employees of the School includes the wearing of clothing appropriate to the employee's position both as a professional and as a minister of the Catholic Faith, in addition to speech and behavior which is befitting these positions. Employees are requested to be conscientious of their personal hygiene, neatness, and the cleanliness of their attire. Clothing and appearance should ensure modesty and sex-appropriateness,

reflecting the Church's teaching on the dignity of the human person as well as the unique dignity of each sex. All employees should comply with the following personal appearance standards:

224.1 Acceptable Work Attire – Business casual.

224.2 Acceptable Attire for Casual Days – Special dress days for class engagement are to be approved by the principal BEFORE taking place.

224.3 Inappropriate Attire – Faculty and Staff are asked to dress professionally at all times when interacting with parents and students. Personal Grooming is expected for online classes.

224.4 Perfume, Cologne, Lotion, Aftershave Lotion or Essential Oils

If perfume, cologne, lotion, aftershave lotions or essential oils are used, moderation should be exercised in consideration of others, as students and co-workers may be sensitive to fragrances.

224.5 Tattoos and Piercings

Visible tattoos that contain language, symbols, or images that may be considered obscene, harassing, or discriminatory, and body piercings (other than earrings) must be covered up during working time.

225 Tobacco Free Campus

The School is a tobacco-free campus in order to provide a safe environment for all students, employees and visitors. This ban on smoking, chewing, or use of all tobacco products (cigarettes, cigars, pipes and tobacco, and any other kind/form of tobacco including electronic cigarettes and vapor products with or without nicotine, or products packaged for smoking or the simulation of smoking) is in effect 24 hours a day, 7 days a week. The policy applies to all students, staff, and visitors to the School, while on school property, and at all school sponsored activities. The policy also applies to everyone providing service to the School and to all vehicles used by the School for transporting students, staff, visitors or other persons.

Any employee who suspects or finds a student using or in possession of drugs, alcohol or tobacco products must immediately report such findings to the principal.

226 Drug and Alcohol Use

All employees are expected to arrive at work fit for duty, and to remain so for the remainder of the work period. No employee may enter the school while under the influence of, or have in his/her possession, any intoxicating beverage or behavior altering drug of any kind. Likewise, the use, sale, transfer or possession of alcohol, illegal drugs (as defined under state or federal law), or controlled substances on the job, on School property, in School vehicles, or in personal vehicles while on School business is prohibited. (Employees using medication prescribed by a licensed physician may be required to provide administration with proof that such medication is safe to take while the employee is on duty and will not adversely affect employee's job performance. Administration will have sole discretion as to whether it will be safe for those employees to remain on duty.)

Employees are strictly forbidden from consuming any intoxicating beverage or behavior altering drug of any kind during work time, break times, or meal periods, nor may they return to work after such breaks or meal periods under the influence of such substances. The use, sale, possession, or being under the

influence of marijuana, whether prescribed or recreational, during working time, while on School property, or while performing School business is prohibited.

Failure to comply with these work rules may lead to disciplinary action, up to and including termination.

227 Solicitation and Distribution

In order to avoid disruption of School operation, employees may not solicit or distribute literature during working time. Non-employees may not solicit or distribute at any time on School property. Working time includes the working time of both the employee doing the soliciting and distributing and the employee to whom the soliciting or distributing is being directed. Working time does not include break periods, meal periods, or any other specified periods during the workday when employees are not engaged in performing their work tasks.

SECTION 300 SAFE ENVIRONMENT

301 Policy Against Sexual Misconduct

Sexual misconduct or harassment in the workplace is wrong and will not be tolerated. All inappropriate physical contact with minors and others is prohibited. The School will take appropriate, decisive action on all accusations of sexual misconduct in accordance with the applicable provisions of civil and canon law. (See Policy 1511)

302 The Charter for the Protection of Children and Young People

The Charter is a comprehensive set of procedures originally established by the United States Conference of Catholic Bishops (USCCB) in June 2002 for addressing allegations of sexual abuse of minors by Catholic clergy. The Charter also includes guidelines for reconciliation, healing, accountability, and prevention of future acts of abuse. It was revised in 2005, 2011, and 2018. The Charter directs action in all the following matters:

- Creating a safe environment for children and young people;
- Healing and reconciliation of victims and survivors;
- Making prompt and effective response to allegations;
- Cooperating with civil authorities;
- Disciplining offenders;

Providing for means of accountability for the future to ensure the problem continues to be effectively dealt with through the Secretariat of Child and Youth Protection and the National Review Board.

303 Safe Environment Protocol

All employees and volunteers who have regular contact with minors or vulnerable adults must complete the Safe Environment Protocol BEFORE being employed or accepted as a volunteer. The following is a summary of the steps required to be considered for employment or volunteer activities.

303.1 Paper Application

The Archdiocesan paper application must be completed in full, dated and signed before it can be accepted by the School. Relatives or parish clergy may not be listed as references on the application. Any false statements on the “declarations” section will result in automatic elimination of the applicant for employment or volunteer service.

303.2 Interview

Each applicant for employment or volunteer work will be interviewed.

303.3 Reference Check

All three references provided by the applicant for employment or volunteer service will be checked.

303.4 Code of Conduct

Applicants for employment or volunteer service must read the Code of Conduct, and then complete and sign the Statement of Receipt and Agreement.

303.5 Safe Environment Training

All employment and volunteer applicants must attend a training workshop.

303.6 Criminal Background Check

The School will conduct a criminal background check using the information provided on the paper application. Background checks are run for persons age 18 and older.

304 Child Abuse Defined

Child abuse is defined as any non-accidental injury to a child by another person. There are various types of child abuse or maltreatment which include:

304.1 Physical Abuse

Non-accidental bodily injury inflicted by a parent, caretaker, or other adult. It can include excessive corporal punishment and injuries resulting in bruises, burns, fractures, internal injuries, and death.

304.2 Sexual Abuse

Sexual assault or exploitation of a child inflicted by an adult can include exhibitionism, lewd or threatening talk, fondling, intercourse, and the use of a child for child pornography.

304.3 Neglect

Negligent or maltreatment of a child by a parent or caregiver under circumstances indicating harm or threatened harm to the child's health or welfare. The term includes both severe or general neglect and acts and omissions.

304.4 Emotional Abuse

Includes verbal assault (belittling, screaming, etc.), continual negative moods, constant family discord, etc.

305 Mandated Reporter of Child Abuse or Neglect

State law requires every person, including teachers and health care professionals, who has reason to believe that a child under 18 years of age is being abused or neglected, or is in danger of being abused or neglected, either by an adult or a peer, is to report the suspicion of abuse or neglect IMMEDIATELY to the Oklahoma Department of Human Services (DHS).

Every health care professional, teacher, and every other person who has reason to believe that a student 18 years or older is a victim of abuse or neglect, either by an adult or a peer, is to report the matter IMMEDIATELY to local law enforcement.

306 Reporting Suspected Child Abuse or Neglect

Failure to report suspected child abuse or neglect is a crime. No person, regardless of their relationship to the child or family, is exempt from reporting suspected abuse or neglect. By law, reporting child abuse or neglect is an individual responsibility. The individual who suspects abuse or neglect is legally responsible for making certain that the report is made to DHS.

If a person has obtained the information leading to his/her suspicions from a professional relationship, the legal responsibility is NOT satisfied by merely reporting the suspicions to a supervisor.

A report to DHS is a request for a safety evaluation to gather facts and protect the child. The individual making the request does not need proof of the abuse or neglect prior to reporting. Investigation and validation of child abuse and neglect reports are the responsibility of DHS or law enforcement officials. If a person becomes aware of additional incidents after the initial report was made, another report to DHS with the additional concerns and information should be made.

306.1 Statewide Child Abuse Reporting Hotline

Hotline: 1-800-522-3511

If a person suspects a child (under 18 years of age) is in immediate danger call 911.

The Statewide Abuse Hotline is available 24 hours a day, seven days a week.

306.2 Information Needed for Reporting

When making a report to DHS, have as much of the following information ready to share with DHS, if possible:

- The names, addresses, ages and whereabouts of the child and the child's parents/guardians, or other persons responsible for the child's welfare, such as at the school, work, daycare, or hospital;
 - Information pertaining to support systems for the family, other individuals who may be aware of the abuse or neglect, or any safety-related issues child welfare may need to be aware of prior to contacting the family, such as domestic violence, presence of weapons, or use of illegal substances;
 - The nature and extent of the abuse or neglect;
 - Any historical information on the family related to the safety and well-being of the children and their parents/guardians or other identified caretakers; and
 - Any other information that might be helpful in establishing the cause of the injuries and the identity of the person responsible.
- An employee or volunteer making a report to DHS must keep documentation of the call made and all pertinent information given regarding the incident, including the case number that will be assigned by DHS. If a reporter does not have all the information listed above, he/she should still call to make the report to DHS. DHS will ask for the reporter's name and phone number. This is voluntary, and a reporter may remain anonymous.

If additional calls to DHS are warranted, the original case number should be given to DHS, and new information given to DHS should be added to the original documentation.

306.3 Suspected Abuse by School or Church Employee, Volunteer, or Clergy member

Make a report to the Statewide Abuse Hotline 1-800-522-3511.

Make a report to the Archdiocesan Pastoral Response Hotline 405-720-9878.

306.4 Notification of Supervisor

The employee's supervisor should also be notified whenever an employee believes that a DHS report may need to be filed to report suspected abuse or neglect. The individual who is a mandated reporter is responsible for filing the report. Supervisors or administrators may not impede or inhibit reporting by a mandated reporter. Permission from the employee's supervisor is not necessary to make a report.

306.5 Notification of Department of Catholic Education

The Department of Catholic Education must be notified when a report is made to DHS or the police for any student.

306.6 DHS Visit to the School

DHS may arrive at the school to interview and check on a student. It may or may not be related to a report to DHS made by a school employee. The principal or principal designee should ascertain that the person is a DHS employee by examining the person's DHS badge. A copy should be made of the DHS badge. The principal must allow DHS access to the student and should safeguard the student's privacy. During the DHS interview of the child, the principal or principal designee should remain during the interview, but not participate in the interview.

The principal or principal designee should document the interview and append the copy of the DHS badge. The principal should not contact the student's parents/guardians to inform them of the DHS

interview.

307 Threatening Behavior by a Student

307.1 Threatening Behavior Defined

Threatening behavior means any verbal threat or threatening behavior, whether it is directed at another person, which indicates potential for future harm to students, school personnel or school property.

307.2 Reporting Threatening Behavior

The state law of Oklahoma requires school employees to notify law enforcement of any threatening behavior made by a student.

307.3 Notification of Department of Catholic Education

The Department of Catholic Education must be notified when a report is made to law enforcement for a student's threatening behavior.

307.4 Police Visit to the School

The school shall cooperate with local and state law enforcement departments.

When it is necessary in the performance of duty for a police officer to lawfully arrest a student in attendance at school or interview a minor in the case of a contemporaneous or imminent crime, the officer is empowered to do so. While the constitutional rights of students may not be infringed upon by the police officer, school officials are not required to nor should they attempt to prevent such arrests or interviews.

In taking such action police officers are required to give due consideration and recognition to the rights, responsibilities, and concerns of school personnel. Consequently, all police officials shall be requested and expected to deal initially with the principal, pastor, or designated school official.

In such matters, as well as in the case of general requests by police officers to question a student in attendance at school, except for a report of suspected in-home abuse or neglect, the following specific procedures shall be followed.

1. The principal or designee shall ascertain the identity and the official capacity of the police officer, the authority under which action is required, and in the case of the release of the student to the officer the reason for such action.
2. The principal shall question the officer to ascertain whether the student is a suspect or a witness to a crime and whether the crime is contemporaneous or imminent.
3. The principal shall request that the police officer delay interviewing or arresting the student until the parents/guardians are present except in the case of a serious and contemporaneous crime or imminent crime. The parents/guardians will be immediately notified and summoned by the principal.
4. If the officer objects or refuses to wait until the parents/guardians arrive the principal shall insist on the right to be present in loco parentis for the interview and/or arrest.
5. If the police officer insists on interviewing the student privately the principal shall declare clearly and in the presence of a witness that the interview is being conducted over the principal's stated objections to the circumstances.
6. The principal shall notify the parents/guardians if the student is interviewed or taken into custody and removed from the school premises.
7. The principal shall keep a detailed, written record of the events and the sequence of procedures followed. This shall include the name, identification badge number, and contact telephone number of the police officer to whom the parent should be referred.

In all cases, the principal shall not hinder the interview or any taking of a student into custody. In these situations, every possible step should be taken to provide privacy for the student.

The fact that a student is interviewed or arrested by the police officer does not necessarily constitute a case for suspension or expulsion.

308 Good Faith Reporting

Persons who make a report to DHS or the police are exempt from discipline and civil liability for acting in good faith if they reasonably believe a child is exhibiting threatening behavior or is being abused or neglected.

309 Safe Environment Curriculum

Safe and Sacred, for students in PK-12, is an archdiocesan curriculum that is taught to students each year. Its goal is to give students the tools needed to help protect them from the many forms of abuse. The curriculum is available for review by parents/guardians by contacting the school office. Teachers may not begin teaching the curriculum until parents/guardians have been notified and given an opportunity to opt-out if they choose.

309.1 Parent Opt-Out

Parents/guardians may opt for their child not to participate in the safe environment curriculum, Safe and Sacred. Parents/guardians are required to complete a refusal for participation form.

310 Volunteers

Only adults and persons 14 and older who have completed the volunteer screening process may serve as volunteers in the school. Employees should not assume a parent/guardian is an approved volunteer without checking with the principal or safe environment coordinator each year.

311 Sexting

Sexting is defined as the act of sending or forwarding through digital devices and other electronic media images or messages that are sexually explicit in nature. Sexting involves:

- Fully nude or semi-nude photographs/images
- Sexually explicit messages
- Transmission to one or more people
- Possession, without transmittal, of fully nude or partially nude photographs/images.
- Interference with a person's personal and social demeanor
- Substantial interference with the School environment.
- Distribution is defined as giving out, sharing, dispensing or selling to others. Possession is defined as having control or ownership. Possession is extended to recipients who have failed to immediately delete, or report having received fully nude or partially nude photograph/images.

Employees or students involved in sexting, possession or transmission of inappropriate photos on their cell phones or other electronic devices face termination or expulsion and criminal prosecution under existing federal laws and state statutes that bar the possession or transmittal of child pornography.

SECTION 400 PROFESSIONAL CONDUCT AND ETHICAL BEHAVIOR

401 Standard of Conduct

Employees are to conduct their employment-related activities in an ethical manner consistent with Catholic teachings and the principles of professionalism, loyalty and confidentiality, adhering to all applicable laws.

The information in this section is provided as a guide for employees to maintain an effective level of service and a work environment consistent with the educational and pastoral mission and ethics of the School. Although it is not possible to provide an all-inclusive list of all types of impermissible conduct, conduct that may lead to disciplinary action, up to and including termination includes, but is not limited to:

1. Stealing or attempting to steal School property, or the property of other employees;
2. Bringing onto School property firearms, ammunition, explosives, hazardous materials or concealed weapons of any kind;
3. Conduct not compatible with or in conflict with the teachings and mission of the Roman Catholic Church;
4. Harassment;
5. Discrimination on the basis of race, sex, color, national origin, citizenship, age, or veteran status or mental or physical ability;
6. Sexual abuse of a minor;
7. Failure by a teacher or supervisor to provide a safe environment for students, employees, volunteers, or the public;
8. Insubordination defined as the refusal of an employee to follow reasonable, lawful instructions from a member of management concerning a work-related matter;
9. Disclosure of confidential and/or protected information;
10. Actual or threatened physical violence;
11. Inappropriate physical contact with students, parishioners, co-workers, volunteers, or clients;
12. Commission of a felony or other crime involving violence or moral turpitude, which has some bearing on work performed for the School;
13. Violation of established policies, including safety/security rules;
14. Unprofessional or immoral conduct;
15. Falsification or material omission on an employment application, or any other School record, including timesheets;
16. Unauthorized removal, misuse, destruction, or damage of property of the School;
17. Possession, distribution, sale, use or being under the influence of alcoholic beverages or illegal drugs while on School property, while on duty, or while operating a vehicle or potentially dangerous equipment leased or owned by the School;
18. Unjustified and/or excessive absence/tardiness;
19. Fighting, scuffling, or indulging in horseplay;
20. Failing to observe dress or safety rules;
21. Leaving work without permission;
22. Threatening, intimidating, coercing, harassing, or interfering with fellow employees or indulging in harmful gossip;
23. Performing activities other than school work during working time;
24. Abusing school telephone privileges. Engaging in excessive non-business use of the Internet or personal cellular telephone use including, but not limited to, texting, instant messaging, blogging, and posting, during working time;
25. Failing to immediately report to the supervisor any injury occurring at work, no matter how slight;
26. Engaging in relationships with other employees which may be considered a conflict of interest, or create a problem of supervision, safety, security, or morale;

27. Engaging in behavior that is offensive to other employees, including distributing or displaying offensive materials;
28. Failing to follow a supervisor's defined schedule without a valid excuse; and
29. Inappropriate social media postings.

402 Policy Against Harassment, Discrimination, and Retaliation

As a matter of policy, the School prohibits all forms of discrimination and harassment. Discrimination is defined as behavior that is offensive to individuals or groups based on race, sex, color, national origin, citizenship, age, veteran status or mental or physical ability. This behavior is considered discrimination when it adversely impacts an individual's employment or creates an offensive or hostile work environment of any type, either explicitly or implicitly. Discrimination may take many forms; some examples include, but are not limited to, jokes, slurs, stories or posted material (paper or electronic) depicting any group in an unfavorable light; objectionable physical proximity or contact; using offensive or demeaning terms to anyone. Employees are urged to report incidents of discrimination to the principal so that appropriate action can be taken.

It is also the goal of the School to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful, unchristian, and will not be tolerated. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve the goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated.

The School will respond promptly to complaints of sexual harassment. Where it is determined that such inappropriate conduct has occurred, the School will act promptly to eliminate the conduct and impose corrective action as is necessary, including disciplinary action where appropriate. Sexual harassment can be described as:

1. Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature which is made, implicitly or explicitly, a condition of the employee's continued employment, or is used as a basis for employment decisions; or
2. When such advances, requests, or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating, or sexually offensive work environment.

Sexual harassment may occur regardless of the intention of the person engaging in the conduct. Employees are protected from offensive behaviors on the part of anyone they encounter in the course of their work for the School. While it is not possible to list all those circumstances that constitute sexual harassment, the following are some examples of conduct, whether communicated verbally, graphically, electronically (e-mail), via text or cell phone or through physical conduct that may constitute sexual harassment:

- Sexual advances – whether they involve physical contact or not;
- Requests for sexual favors in exchange for actual or promised job benefits;
- Sexual jokes;
- Use of sexual epithets; written or verbal references to sexual conduct;
- Displaying sexually suggestive objects, pictures, or cartoons;
- Leering, whistling, brushing against the body, sexual gestures, suggestive, insulting or offensive comments.

Behavior that does not rise to the level of illegal harassment as defined by law may still be unacceptable in the workplace and a violation of this policy subjecting an employee to disciplinary action, up to and including termination.

402.1 Reporting and Complaint Procedures

When a complaint is received, immediate steps will be taken to investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. The investigation will include a private interview with the person filing the complaint and with witnesses. An interview of the person alleged to have committed sexual harassment will also be done. When the investigation is complete, the results of that investigation will be disclosed to the appropriate parties.

The most important responsibility of each employee is to report any conduct that is offensive immediately to the principal or pastor.

403 Non-Fraternization

In order to effectively operate school business and avoid problems with supervision, morale, or the creation of an environment which may produce claims of sexual harassment, administrators and supervisors are strongly discouraged from fraternizing or becoming romantically involved with one another, or with any subordinate employee in their chain-of-command or with any non-administrative employee.

Such relationships are prohibited when in the opinion of the School, the personal relationship may create a conflict of interest, cause disruption, create a negative or unprofessional work environment, or presents concerns regarding supervision, safety, security, or morale. If an employee should enter a relationship with a fellow employee, they must disclose this to their supervisor.

404 Conflict of Interest Policy

In the course of business, situations may arise in which an employee has a conflict of interest, or in which the process of decision-making may create an appearance of a conflict of interest. A conflict of interest arises when an employee involved in decision-making is in the position to benefit, directly or indirectly, from his/her dealings with the School or person conducting business with the School.

Some of the most common conflict of interest situations include:

- Use of School information for private gain;
- Involvement in outside activities that have goals in conflict with Church teachings;
- Spouses, or relatives as suppliers, vendors, or business partners;
- Commissions, kickbacks, rebates, gifts or gratuities from suppliers or vendors; and
- Honorariums

In these situations, the employee should discuss the situation with his/her supervisor for resolution.

Employees have an obligation to:

- Avoid conflicts of interest, or the appearance of conflicts, between their personal interests and those of the School in dealing with outside entities or individuals
- Disclose real and apparent conflicts of interest to the Principal, and
- Refrain from participation in any decisions on matters that involve a real conflict of interest or the appearance of a conflict.

Disclosure Requirements

- The first step in addressing conflicts of interest is disclosure. An employee who believes that he/she may be perceived as having a conflict of interest in a discussion or decision must disclose that conflict to the group making the decision. Most concerns about conflicts of interest may be resolved and appropriately addressed through prompt and complete disclosure.

Resolution of Conflicts of Interest

- All real or apparent conflicts of interest shall be disclosed to the principal who will assure prompt resolution.

Given the importance of resolving conflicts of interest, violations of this policy, including failure to disclose conflicts of interest, may result in termination.

405 Business Conduct and Ethics

The successful operation of the school is built upon the principles of fair dealing and ethical conduct of School employees. The school's reputation for integrity and service to the community requires careful observance of the spirit and letter of all applicable laws and regulations, as well as regard for the highest standards of conduct and personal integrity. The school will comply with all applicable laws and regulations and expects its employees to conduct business accordingly.

406 Whistleblower Policy

If any employee reasonably believes that some policy, practice, or activity of the School is in violation of law, a written complaint must be filed by that employee with the Director of Human Resources or the superintendent.

It is the intent of the School to adhere to all laws and regulations that apply to the School, and the purpose of this policy is to support the School's goal of legal compliance. The support of all employees is necessary to achieve compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of the Director of Human Resources and/or the superintendent and provides the School with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

The School will not retaliate against an employee who, in good faith, has made a protest or raised a complaint against some practice of the School, or of another individual or entity with whom the School had/has a business relationship, with a reasonable belief that the practice is in violation of law or a clear mandate of public policy.

The School will not retaliate against an employee who discloses or threatens to disclose to a supervisor or a public body any activity, policy, or practice of the School that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning health, safety, welfare, or protection of the environment.

407 Confidentiality

Because of the confidential nature of the services provided by the School, all employees and volunteers are required to keep all personnel, service recipient and donor information confidential. Violation of student confidentiality will result in disciplinary action up to and including termination of employment.

408 Defamation of Character

Employees should pay attention about what they say about other people. Slander is oral defamation; libel is written defamation. State only observable facts and not opinions. Be judicious in stating facts. Ask: "Why does this person need to hear this" or "Why do I need to say it to this person or persons?"

409 School Business

It is expected that all employees will support the decisions of the school administration as well as the professional actions of one another. It is never acceptable to discuss professional differences with students or with parents/guardians. Any breach of professional confidence may be cause for dismissal. The actions or teaching abilities of co-workers should not be discussed except with the person or with the principal.

410 Political / Partisan Support

Employees may not engage in any activity supporting or opposing a political candidate during work hours, using School materials or equipment, including distributing promotional materials and wearing clothing -supporting/opposing a political candidate. Employees are not allowed to display visible signs of support for a political candidate. This includes buttons, signs, or bumper stickers placed on a car parked in the school parking lot. Employees are prohibited from utilizing their positions as employees in support of or in opposition to any political candidate. Any distribution or posting of material supporting/opposing a political candidate may jeopardize the School's non-profit designation and is prohibited.

411 Public Relations

All contact with the media of any type or description must be referred to the principal who will consult with the superintendent and the Archdiocesan Director of Communication. Any requests for interviews, press releases or social media postings must be approved in advance by the principal.

412 Money Collected

Any individual handling or receiving cash or cash equivalents (i.e., gift cards, gas vouchers) is responsible to the School for proper security and accountability. It is important that only authorized employees accept and provide receipts for funds. Employees are required to appropriately safeguard, account for and document all cash received on behalf of the School. All monies or cash equivalent items will be maintained in a secure, locked device or some other location appropriately approved by the principal.

413 Travel

The School will reimburse employees for reasonable business travel expenses incurred while on assignments away from the normal work location. The supervisor must approve all business travel in advance.

When approved, the allowable costs of travel, meals, lodging, and other expenses directly related to accomplishing business travel objectives will be reimbursed. Alcoholic beverages will not be reimbursed. The principal or business manager will provide guidelines on allowable expenses and assistance on procedures regarding reimbursement, travel arrangements, expense reports, or any other business travel issues. When travel is completed, employees must submit completed expense reports in a timely manner, but not later than 30 days from return of travel. Original receipts must accompany the request for reimbursement.

Employees are expected to limit expenses to reasonable amounts. Mileage reimbursement will be made at the current rate allowed by the IRS approved rate. Additional expenses arising from any associated travel, incident to the approved business travel, are the responsibility of the employee.

Abuse of these general business travel policies and any instructions from the business office, including falsifying expense reports to reflect costs not incurred by the employee, can be grounds for disciplinary action, up to and including termination of employment.

414 Use of School Property / Facilities

Employees may not divert School property, or any item donated to the School to their own personal use. Employees may not engage in a business enterprise or fee for service activity on School premises. This policy includes, but is not limited to, the personal use of the organization's name, logo, stationery, supplies, equipment, computers, telephone, fax machines, postage and postage meters, vehicles, office machines, or other property for personal purposes. No fees or stipends should be accepted for services performed within the scope of employment or performed on work time.

415 Investigations and Searches

From time to time, the School may conduct internal investigations pertaining to safety and security, auditing or work-related matters. Employees are required to cooperate fully with and assist in these investigations if requested to do so.

While on School property, employees should have no expectation of privacy in their work spaces, assigned storage areas or in their personal effects (including cars parked on school property). School property includes all school and church buildings and storage areas, grounds and parking lots. The School reserves the right, at all times, and without prior notice, to inspect and access any and all School property. This may occur during or after business hours, and in or out of the presence of the employee.

The School retains the right to conduct reasonable searches of personal belongings (i.e., briefcases, bags, purses) and work areas (i.e., desks, file cabinets, etc.) without notice to guard against violence, theft, possession or distribution of inappropriate information or materials, possession or use of drugs and alcohol, or an exigent circumstance. Searches shall be conducted reasonably to protect the dignity and privacy rights of individuals. Searches shall be conducted by two persons to protect the rights of the person searched. To the extent a search is requested, and the employee is present, the employee may refuse the search; however, such refusal can result in discharge from employment for refusal to cooperate.

If circumstances allow, the superintendent should be contacted prior to conducting a search of an employee.

416 Alcohol at School

The School is not permitted to serve alcohol to employees at any time in the school day. This includes employee gatherings after school. Alcohol should never be stored any place in the school building. In the event the school has an adult social event, such as an auction, the principal will make advance plans to determine where any alcohol will be temporarily stored until it is picked-up. The alcohol will be secured so that it is inaccessible to students.

SECTION 500 Classification & Categories of Employment

501 Regular Full-Time

Employees are regularly scheduled to work 30 or more hours per workweek. Regular full-time employees are entitled to archdiocesan employee medical benefits, subject to the eligibility and waiting period requirements for any plan or program.

502 Part-Time

Employees are regularly scheduled to work at least 20, but fewer than 30 hours per workweek. Part-time employees are not eligible for medical benefits. Sick leave and vacation, if applicable, accrue on a prorated basis.

503 Temporary Full-Time

Employees are regularly scheduled to work 35 or more hours per week; however, the length of employment cannot extend beyond 180 days. Temporary full-time employees are not eligible for benefits other than government mandated benefits.

504 Occasional Part-Time

Employees have work schedules that change from week to week based on the needs of the School with no guarantee of a certain number of hours to be worked each week. Other than government mandated benefits, no benefits are extended to this employee classification.

505 Fair Labor Standards Act

In addition to the above-listed categories, employees are also classified, per the Fair Labor Standards Act Classification, as either non-exempt or exempt for the purpose of overtime compensation.

505.1 Non-Exempt Employees

Non-exempt employees include all those who are covered by the overtime provisions of state and federal law. Employees in this category are entitled to overtime pay for work in excess of 40 hours in a workweek.

505.2 Exempt Employees

Exempt employees include all those who are classified by the School as exempt from overtime pay under the federal Fair Labor Standards Act and related regulations, the Oklahoma Department of Labor, and the executive, administrative, or professional exemptions set forth in the above referenced legislation. Each position classified as exempt will be reviewed to assure compliance with the Fair Labor Standards Act.

SECTION 600 PERSONNEL RECORDS

601 Changes in Information

Employees should promptly notify the principal or business manager of any changes in pertinent information such as name, address, telephone number(s), emergency contact(s), and information related to a change in insurance eligibility and other benefit matters.

602 Job Descriptions

Every position has a job description outlining the essential functions, responsibilities, duties, classification and qualifications for the position. The job description may be revised periodically to reflect changed duties for that position. This description is the basis for assuring the completion of the expectations of the employee's position and serves as a reference point for training and evaluation of performance. Job descriptions may be revised periodically to reflect changed duties for that position. Job descriptions may be changed by the principal (with or without notice and with or without change in compensation), additional job responsibilities may be assigned, and positions may be reassigned or transferred.

603 Performance Evaluation

The formal performance evaluation provides an opportunity to discuss the major duties and job expectations upon which performance is rated. A candid review and discussion of job-related strengths and areas where improvement is necessary is important in any employment relationship. The performance appraisal is also designed to provide an opportunity to identify strengths and areas in which additional training and/or improvement are needed. Each employee will receive at least one written performance evaluation per school year. Teachers can expect 5 short walk-through evaluations and one full class observation in addition to the self-evaluation and summative assessment that will be completed prior to a contract for the following year being issued.

603.1 Preparation of Performance Evaluation

Evaluations will be prepared in writing by the employee's immediate supervisor and constructively discussed in private with the employee. A performance evaluation is not necessarily tied to any increase in income, but it is meant to review pertinent job-related issues.

603.3 Employee Signature

The signature of the employee on the evaluation does not necessarily mean that he/she agrees with the evaluation. In cases of disagreement, the employee is encouraged to note such on the evaluation, or submit a separate, signed statement indicating the points of disagreement. This statement becomes part of the evaluation and will be filed in the employee's personnel file.

603.2 Distribution

All evaluations are to be prepared in duplicate and signed and dated by the employee and the immediate supervisor. The original is placed in the employee's confidential personnel file and a copy given to the employee.

604 Personnel File

An official personnel file will be maintained for each employee by the principal. The personnel file retains necessary and related information (job application, resume, records of training, documentation of performance evaluations, salary increases, etc.) about each employee. Personnel files are the property of the School and the School reserves the right to control those documents in a manner that is consistent with its business interests.

605 Inspection of Personnel File

Each employee has the right to inspect his/her personnel records that the School maintains relating to the employee's performance and legally required documents. Inspection of such records will be permitted upon written request of the employee to the principal. Inspections of records will take place at a reasonable and mutually agreeable time with the principal or designee present. Employees may not remove items from their personnel file. The School will honor the request of referents regarding confidentiality of provided references, and employees will not have access to review the references in their personnel file.

SECTION 700 SALARY ADMINISTRATION

701 Promotions, Transfers, and Demotions

When an employee changes positions, his/her salary may or may not be adjusted depending on the employee's current salary in relation to the responsibilities of the new position. The factors considered in an employee's eligibility for promotions and transfers include, but are not limited to, the requirements of the new position, and the employee's education, experience, attendance, and performance history.

702 Wage Increases

The School's intent is to motivate and reward a high level of performance by reviewing both performance and compensation on an annual basis. The yearly evaluation does not guarantee an adjustment in salary to any employee. Wage increases are at the sole discretion of the School, and they may or may not be given depending on an employee's performance and financial considerations.

SECTION 800 HOURS OF WORK AND COMPENSATION

801 Method of Pay

All non-exempt employees are paid on an hourly basis, calculated on actual hours worked. Exempt employees are paid on a salary basis.

802 Payroll

All employee compensation must be processed through payroll using Paycom.

803 Paydays and Pay Periods

Site specific- TBD upon the opening of the school.

804 Work Schedule

804.1 Standard Workweek

All hours worked by non-exempt employees in excess of 40 hours in one workweek will be treated as overtime. The standard workweek begins each Sunday at 12:01 a.m. and ends at 12 midnight the following Saturday. Employee work schedules are established within this framework.

804.2 Work Hours

Work hours vary by location and department and are established and promulgated by the appropriate supervisor. Work hours may be amended to better meet the needs of the School's operation.

804.3 Basic school hours

The school is open 8:00 a.m. to 3:30 p.m.

805 Compensation and Overtime

It is the policy of the School to comply with all applicable state and federal laws regarding the payment of compensation and overtime. Non-exempt employees must report all time worked and be compensated appropriately. The following conditions apply to overtime:

805.1 Approval

All non-exempt employees must obtain approval in advance from their immediate supervisor prior to working overtime.

805.2 Calculation

- Non-exempt overtime hours will be compensated at overtime rates as follows:
- Compensation for hours in excess of 40 for the workweek will be paid at a rate one and one-half times the employee's regular hourly rate of pay.
- Weekend work does not automatically qualify for compensation at an overtime rate of pay.
- Non-exempt employees who work on holidays will be paid at the overtime rate of pay.

805.3 Non-Exempt Employee Volunteer Work

A non-exempt employee may not volunteer and work unpaid hours in his/her regular paid position. A non-exempt employee may, however, volunteer in other capacities provided there is no pressure or expectation for them to do so.

805.4 Exempt Employees

The salary of an exempt employee is intended to cover all compensation to which he/she is entitled. Exempt employees are not to receive additional compensation for extra hours worked, nor are they entitled to time off in lieu of compensation. Accordingly, any authorized time off will be at the discretion of the appropriate supervisor. Neither extra compensation nor adjusted time off will be owed or payable, under any circumstances, to an exempt employee upon termination of employment.

805.5 Compensatory Time Off

Compensatory time off is not permitted.

806 Meal and Rest Periods

The School authorizes and permits non-exempt employees to take rest periods, which insofar as practicable shall be in the middle of each work period. The authorized rest period shall be based on the total hours worked daily at the rate of 10 minutes total rest time per four hours or major fraction thereof, as indicated in the following chart:

Hours Worked	Ten Minute Rest Periods
3.5 – 6	1
6 – 10	2
10 – 14	3

Rest periods may not be added to meal periods to extend the time, nor used to make up for tardiness, or leaving work early.

Non-exempt employees are also provided an uninterrupted 30-minute unpaid meal period each day. During this meal period, employees are relieved of their work duties and the School relinquishes control over the employee's activities.

The School will permit employees a reasonable opportunity to take their meal period and will do nothing to impede or discourage employees from taking their meal period.

807 Timekeeping

Non-exempt employees are required to complete a daily individual time record showing the actual time worked. This includes recording start time, time out for lunch, time in from lunch, and departure time for each workday. Time must be recorded daily online through Paycom, on a timesheet or timecard in ink, or other method designated by the employee's supervisor. Each non-exempt employee is responsible for filling in his/her time sheet completely and accurately and for the timely submission of the time sheet to his/her immediate supervisor for approval.

Both the employee and the appropriate supervisor must sign each time sheet and initial any modifications or alterations weekly, if done manually. Altering, falsifying, tampering with time records, or recording time on another employee's time record may result in disciplinary action, up to and including termination of employment.

Both exempt and non-exempt employees are required to report/record time away from work, including vacation, sick leave, leaves of absence, personal days, jury duty, etc.

808 Direct Deposit

All employees are required to have direct deposit for payroll.

809 General or Standard Deductions

State and federal payroll taxes will be withheld from each employee's paycheck in accordance with state and federal law. These deductions include, but are not necessarily limited to, state and federal income tax, social security tax (FICA), and Medicare. Deductions may also be made for health insurance or other employee benefit premiums elected by the employee.

810 Garnishment of Wages

If the School receives a court order or notices from federal or state government to garnish an employee's wages, it must comply with that order. The principal will notify the employee when a garnishment notice has been received, when it will become effective, and when the terms of the garnishment have been satisfied. All garnishments will be handled in a confidential manner, to the greatest extent possible.

811 Attendance

The mission of the School requires punctual and consistent attendance of all employees. Poor attendance often results in compromising service and places an undue hardship on other employees.

811.1 Punctuality

Punctual and consistent attendance is a condition of employment. Failure to report to work, repeated tardiness, or leaving early without approval, may result in disciplinary action, up to and including termination.

811.2 Reporting

Frequent or excessive absence or tardiness, with or without compelling reasons, may lead to disciplinary action, up to and including termination. If for any reason an employee is unable to report to work or expects to be late, he/she should notify the appropriate supervisor, or designate in advance as soon as possible before the beginning of the shift for each day he/she expects to be late or absent. Notification should be made to the principal, or principal designee, as soon as an absence or tardy situation is known.

811.3 Reasons

Employees are expected to provide the reasons for any absence or tardiness and the length of time they expect to be absent from work.

811.4 Return from Major Illness/Surgery

Before returning to work from a major illness/surgery, a school employee must obtain a written release from his/ her physician.

811.5 Failure to Report to Work – Job Abandonment

If an employee is absent without leave or notification for a period of three or more consecutive working days without a compelling reason, it may be presumed that the employee has voluntarily terminated his/her employment at the end of the third day of absence.

SECTION 900 BENEFITS

The Archdiocese offers a comprehensive, cost-effective benefits package to help protect employees and their family. To help eligible employees make benefit choices, the Archdiocese provides employees with an annual enrollment guide. The following information is a brief description of available benefits. See Plan Benefit descriptions for more specific, detailed information.

901 Dates of Coverage

Dates of coverage are August 1, XX to July 31, XX subject to the designated waiting period.

902 Eligibility

Full-time employees who normally work 30 hours or more per week, are eligible to participate in the archdiocesan benefit program. Benefits are effective upon completion of the designated waiting period.

Eligible dependents may also be covered, including:

1. opposite sex spouse,
2. eligible children up to age 26 (full-time student status may be required in some cases). Children are defined as the employee's natural children, stepchildren, legally adopted children, and children under legal guardianship,
3. physically or mentally disabled children of any age who are incapable of self-support.

903 Open Enrollment

Employees will be notified of open enrollment time periods, which usually occurs each May. Selection of benefits is accomplished through Paycom.

904 Employer Paid Benefits

Benefit-eligible employees are offered a variety of benefits with the School paying 100% of the premium. These employer-paid benefits include medical, dental, basic life insurance and AD&D insurance, and long-term disability.

904.1 Health insurance

Affordable, quality healthcare protection is one of the most valuable benefits offered by the Archdiocese. The medical plan, administered by Aetna, provides comprehensive, flexible coverage with many features. Choose to use network providers for the highest level of benefits.

904.2 Dental Benefits

The Plan offers employees and their family comprehensive, quality dental coverage administered by Delta Dental. The Delta Dental plan emphasizes preventive and diagnostic care and pays a larger share of the expense for these types of services. The premium for the employee is paid by the School. The cost to enroll dependents is the responsibility of the employee.

904.3 Basic Life and AD&D Insurance

Basic Life & Accidental Death & Dismemberment (AD&D) is administered by Unum.

Eligible employees are provided with life and AD&D insurance in the amount of one times their annual salary up to \$50,000.

904.4 Long Term Disability (LTD)

This plan is income protection in the event the employee's disability extends beyond the timeframe for short-term disability. There is no cost to the employee.

905 Optional Employee Paid Benefits

905.1 Vision Benefits

The School offers the employee and their family a quality vision program administered through Vision Benefits of America. The cost for this benefit is the responsibility of the employee.

905.2 Supplemental Life Plan

The plan allows employees the option to purchase additional life insurance. Supplemental term life insurance is available for the employee and eligible dependents. If selected, the premium amount the employee pays will be deducted from his/her paycheck. The cost is based on age and the amount of coverage elected.

905.3 Short-Term Disability Plan (STD)

STD provides employees with income when they are not able to work due to injury or illness. Full-time employees who normally work 30 hours per week, are eligible to apply for this coverage, within 30 days of hire date. If an employee applies during annual enrollment this coverage is subject to the submission of an Evidence of Insurability and approval from Unum. Benefits from the STD plan will equal 60% of an employee's weekly earnings not to exceed \$1,000 per week.

905.4 Accident Insurance

This coverage provides cash benefits for expenses related to accidental injuries. The accident insurance plan can provide benefits for covered accidents that occur off the job. Accident insurance is offered to all eligible employees ages 17 to 80 who are actively at work.

906 Benefit Election Changes

The benefits an employee chooses will remain in effect through the end of the calendar year. IRS rules do not allow any benefit changes during the plan year unless there is a qualifying change in family or employment status. A change request form along with proof of status change must be submitted within 30 days of the qualifying event. These qualifying events include:

1. Change in marital status
2. Change in the number of dependents, including birth of child
3. Change in the employee's or spouse's employment
4. Dependent satisfies or ceases to satisfy eligibility
5. Commencement or termination of adoption proceedings
6. Significant cost or coverage changes in employee, spouse, or dependent plans
7. FMLA leave, HIPAA Special Enrollment, COBRA Event, Court Judgment or Decree
8. Medicare or Medicaid entitlement, or loss
9. Loss of eligibility for coverage under Medicaid or the Children's Health Insurance Program (CHIP)*
10. Determination of eligibility for a premium assistance subsidy under Medicaid or CHIP.*

*Must request enrollment within 60 days of the loss of Medicaid or CHIP or the determination of eligibility for a premium assistance subsidy.

907 Retirement Plans

Retirement benefits are available to School employees. There are two options for retirement plans – the Archdiocesan 403(b) Plan or TIAA-CREF. Full-time contracted teachers and principals may choose from either option. All other employees may participate only in the Archdiocesan 403(b) plan administered by MetLife.

907.1 403(b) Plan

A representative of MetLife will act as liaison for employees and the School participating in the

plan which will be administered by the School. Each employee will meet privately with the representative to enroll and to decide how contributions are to be invested.

Participation begins after a one-year employment requirement, reaching 18 years of age, and working at least 1,000 hours per year (approximately 20 hours a week year-round and approximately 30 hours a week for school staff).

The School contributes an amount equal to 3% of the participant's salary each year. In addition, the School will match the first 4% of an employee's contribution at 50% of such amount.

Employees who have not yet completed the one-year employment requirement and those employees not working at least 1,000 hours per year, may, as of their date of hire, choose to begin a salary deferral program with MetLife without employer matching contributions. When eligibility requirements have been met, the balance of this account will be transferred into the plan and the School's contribution will begin.

Employee salary deferrals are fully vested upon contribution. Matching contributions become vested in five years (20% per year).

907.2 TIAA-CREF

The TIAA-CREF retirement program is administered from the Archdiocesan Catholic School Office, where applications and brochures detailing the program are available.

Full-time contracted teachers and principals are eligible immediately upon full-time employment. Other contracted teachers may participate without employer contributions.

Each participant will contribute 5% of the gross monthly compensation. The School shall match the participant's contribution. The combined sum shall be forwarded monthly to Catholic Teachers' Annuity, Catholic School Office, P. O. Box 32180, OKC, OK 73123.

Employee salary deferrals and employee matching contributions are fully vested upon contribution.

908 Workers' Compensation

The School takes its responsibility for the physical safety of employees very seriously, and it requires employees to share the responsibility for personal safety and the safety of others while on work premises, and during all work-related assignments. No job must ever become so habitual or urgent that safety precautions are not observed.

908.1 Reporting Requirements

a. It is each employee's duty to report any incident, injury, or unsafe condition to the principal. Every supervisor is responsible for reporting and/or correcting an unsafe condition within the work area. The employer is responsible for training, communications, safety education, and timely reporting of occupational injuries or illness and accident investigations.

b. All work-related accidents and injuries must be reported to the principal, no matter how minor they might appear. If an employee's injuries require medical attention, the principal should determine the location of the nearest injury clinic that is acceptable to the School's workers' compensation carrier. If circumstances permit, the principal should give the employee the workers' compensation form to take to the clinic, so that all medical related expenses are billed to the School's workers' compensation insurance company and not the employee's personal medical insurance. If the injury is life-threatening or serious, call 911 immediately.

c. The Principal must report all injuries within 24 hours of an incident to the Workers'

Compensation carrier using the specific forms indicating where, when, and how the injury occurred and the type of medical treatment that was received, if any. If an employee is going to be hospitalized for longer than eight hours, the appropriate supervisor must notify the archdiocesan Business Office. Any delay in reporting an injury could result in a delay in Workers' Compensation benefits to the employee and a significant fine to the location.

908.2 Benefits

All School employees are covered by Workers' Compensation insurance for work-related injuries or illnesses. Workers' Compensation insurance benefits include:

- a. Medical care to treat a work-related injury
- b. Monetary payments to partially replace lost wages; and/or
- c. Possible additional payments for serious or fatal injuries

908.3 Payment Workers' Compensation

Benefits are equal to approximately two-thirds of the employee's average weekly gross salary, up to the maximum set by the state. Workers' Compensation payments exclude the first three days that an employee is off work. If an employee's work-related injury or illness requires hospitalization or goes beyond 21 days, benefits will date back to the first three days of disability. Workers' Compensation benefits are not subject to tax withholdings.

908.4 Integrated Benefits

- a. Integration with Sick Leave Benefits - The first three days of the injury or illness will be paid out of the employee's sick leave account. Sick leave will be paid to the extent necessary to provide the employee with a combination of Workers' Compensation and sick leave benefits equal to his/her regular straight time compensation. These payments will continue until sick leave benefits are exhausted or the employee is released to return to work, whichever occurs first. The dollar value of benefits used to supplement Workers' Compensation payments in this manner will be deducted from the employee's sick leave accumulation.
- b. Integration with Vacation and Personal Day Pay - If sick leave benefits are exhausted then vacation and/or personal day pay may, upon request, be used in an integrated manner with Workers' Compensation benefits as described above.
- c. Sick leave, vacation, and personal day benefits do not accrue during a Workers' Compensation leave. For additional information, please contact the Archdiocesan Business Office.

909 Unemployment Insurance

The School does not pay state unemployment premiums; therefore, terminated employees do not qualify to apply for unemployment insurance.

SECTION 1000 TIME AWAY FROM WORK

The benefits described in this section are provided to employees to facilitate a working environment that is supportive and allows time for rest and relaxation.

1001 Documentation

The official record of an employee's vacation, sick leave, and personal days is maintained by the School on Paycom or in writing.

1002 Paid Vacation

The School provides paid vacation to all benefit-eligible employees (except school faculty) who regularly work 30 or more hours per week and are scheduled to work 10 or more months per year.

Vacation accrual begins on the date of hire. No more than 40 hours of vacation may be carried over at the end of the calendar year. Vacation for full-time employees is accrued as follows:

<u>Years of Service</u>	<u>Accrual Rate per Pay Period</u>	<u>Number of Days</u>
Less than one year	1.57 hours	5 days
1 – 5 years	3.13 hours	10 days
6 – 10 years	4.69 hours	15 days
After 10 years	6.25 hours	20 days

Regular part-time employees earn vacation on a prorated basis based on the number of regular hours normally scheduled.

Occasional part-time and temporary employees are not entitled to time off with pay.

Employees on unpaid leave do not accrue vacation time.

If a holiday occurs during an approved vacation period, an employee will be paid regular pay for that day.

When approving leave requests, supervisors will consider staffing requirements, respective lengths of service, and employee performance. Every effort will be made to honor the employee's request with consideration given to not interrupting the school's operation when school is in session. Vacation day requests longer than two days should be taken during the summer months when school is not in session.

1003 Sick Leave and Personal Leave

Sick leave benefits are provided to help reduce the economic hardship eligible employees might incur from a short-term illness or injury. Sick leave may be used for illness or injury or visits to a health care provider or for family emergencies or medical appointments for members of the employee's immediate family. Immediate family is defined as spouse, parents or children or an individual for whom the employee has sole responsibility for care.

On the first day of employment, full-time employees (30 Hours per week, 10+-months) receive 8 days of sick leave and 2 days of personal leave each year. Personal days not used in the current school year are converted to sick days. A maximum of 60 days may be accumulated.

On the first day of employment, year-round, full-time employees receive 10 days of sick leave and 2 days of personal leave each year. Personal days not used in the current school year are converted to sick days. A maximum of 60 days may be accumulated.

Part-time employees receive sick and personal days on a prorated basis based on the number of hours scheduled. The number of days is included on the employee's Summary of Salary and Benefits form.

Employees' pay will be docked if their supply of sick and personal time is exhausted. If an employee misses work because of sickness, illness, injury, or disability, the employee may be asked to provide a satisfactory statement from a qualified health care provider, verifying that the injury or disability exists/existed and its beginning and ending dates. The statement may also be required to verify the employee's ability to return to work.

Sick leave benefits are subject to the following conditions:

- a. Unused sick leave is forfeited at the time of termination of employment
- b. An employee does not accumulate sick leave while on any unpaid leave
- c. Only sick leave that has already accumulated may be taken
- d. All accumulated sick leave transfers with the employee to a new Archdiocesan location
- e. Sick leave benefits are not transferable or donatable from one employee to another
- f. Employees must provide notification of absence daily, unless they have notified their supervisor that they will be absent more than one day or are on an approved leave of absence

The School reserves the right to require certification from a licensed health care provider when an employee misses work due to illness, injury, or disability. This statement must include the following:

- a. Date on which the health condition commenced
- b. Probable duration of the condition; and
- c. If the sick leave is requested to care for a family member, certification from the licensed health care provider that the family member requires the care of the employee
- d.

The employee may be required to submit certification if the absence is three days or longer. Refusal of any employee to submit such certification will be considered cause for nonpayment of personal leave and may be cause for termination. Although certification from a licensed health care provider is not normally required for absences fewer than three working days, it may be required under certain circumstances.

Employees falsifying the need for paid sick leave are subject to disciplinary action, up to and including termination.

1004 Bereavement

Three days with pay will be granted to employees for the death of an immediate family member. For the purpose of this policy, immediate family member is defined as husband, wife, children, stepchildren, parents, mother- or father-in-law, son- or daughter-in-law, grandparents, grandchildren, siblings or

persons for whom the employee has the primary care responsibility or by whom they may have been raised. One additional day for travel may be granted upon the approval of the employee's supervisor.

Death notice and travel documentation may be required for this leave. If needed, the employee may request additional days from his/her supervisor. The days used for a bereavement leave are deducted from the employee's accrued sick days.

1005 Holidays

School is closed on the following paid holidays:

New Year's Day

Good Friday

Easter Monday

Memorial Day

Independence Day

Labor Day

Thanksgiving Day

Christmas Day

SECTION 1100 LEAVES OF ABSENCE

It is the policy of the School to provide eligible employees with unpaid leaves of absence in certain situations. A leave of absence may be granted for time away from work in excess of one week. Valid reasons for a leave of absence include extended illness or injury, childbirth, adoption, care of a seriously ill member of the immediate family, personal necessity, disability, or military service.

This section provides an overview of the rights and obligations of both the School and the employee. It is not intended to, nor does it increase or diminish the obligations set forth under federal and state law.

Any questions regarding leaves of absence should be directed to the principal or Archdiocesan Director of Human Resources.

1101 Family and Medical Leave (FMLA)

1101.1 Eligibility

To be eligible for FMLA benefits, an employee must:

- a. have worked for the School for a total of 12 months;
- b. have worked at least 1,250 hours over the previous 12 months

1101.2 Qualifying Events

A total of 12 work weeks of leave will be available during any 12-month period for one or more of the following reasons:

- a. for the birth and care of a newborn child of the employee;
- b. for placement with the employee of a son or daughter for adoption or foster care;
- c. to care for a spouse, son, daughter, or parent with a serious health condition;
- d. to take medical leave when the employee is unable to work because of a serious health condition; or
- e. for qualifying exigencies arising out of the fact that the employee's spouse, son, daughter, or parent is on active duty or called to active-duty status as a member of the National Guard or Reserves in support of a contingency operation.
- f. Care of a covered service member by an employee who is the spouse, child, parent, or next of kin.

1101.3 Starting Period and Duration

The 12-month period commences with the first day of FMLA and ends 365 days from the first day of leave.

During the single 12-month period in which leave is taken to care for a covered service member, if the employee needs FMLA leave for any other reason, the employee is entitled to a combined total of 26 weeks.

1101.4 Intermittent Leave

Under some circumstances, employees may take FMLA leave intermittently (taking leave in separate blocks of time for a single qualifying reason – or on a reduced leave schedule – reducing the employee's usual weekly or daily work schedule). When leave is needed for planned medical treatment, the employee must make a reasonable effort to schedule treatment so as not to unduly disrupt the organization's operation. If FMLA leave is for birth and care, or placement for adoption or foster care, use of intermittent leave is subject to the organization's approval.

1101.5 Maintenance of Health Benefits

The School is required to maintain group health insurance coverage for an employee on FMLA leave whenever such insurance was provided before the leave was taken and on the same terms as

if the employee had continued to work. If applicable, arrangements will need to be made for employees to pay their share of health insurance premiums while on leave.

1101.6 Military Member Provisions

The FMLA entitles eligible employees to take up to 12 workweeks of unpaid, job-protected leave in a 12-month period for specified family and medical reasons, or for any “qualifying exigency” arising out of the fact that a covered military member is on active duty or has been notified of an impending call or order to active duty, in support of a contingency operation. The FMLA also allows eligible employees to take up to 26 workweeks of job-protected leave in a “single 12-month period” to care for a covered service member with a serious injury or illness.

1101.7 Employee Notice

Employees seeking to use FMLA leave are required to provide 30-day advance notice of the need to take FMLA leave when the need is foreseeable and such notice is practicable. If leave is foreseeable fewer than 30 days in advance, the employee must provide notice as soon as practicable – either the same or next business day. When the need for leave is not foreseeable, the employee must provide notice to the employer as soon as practicable under the facts and circumstances of the case. Absent unusual circumstances, employees must comply with all provisions of the attendance policies of the School.

All sick and vacation leave must be used prior to commencement of unpaid leave.

1101.8 Recertification

The School may request recertification for the serious health condition of the employee or the employee’s family member no more frequently than every 30 days unless circumstances have changed significantly, or if the employer receives information casting doubt on the reason given for the absence, or if the employee seeks an extension of his/ her leave. Otherwise, the School may request recertification for the serious health condition of the employee or the employee’s family member every six months in connection with an FMLA absence. The School may provide the employee’s health care provider with the employee’s attendance records and ask whether need for leave is consistent with the employee’s serious health condition.

1101.9 Procedure for Requesting FMLA Leave

All employees requesting FMLA leave must provide verbal or written notice of the need for the leave to the principal. Within five business days after the employee has provided this notice, the principal will complete and provide the employee with the DOL Notice of Eligibility and Rights form.

When the need for the leave is foreseeable, the employee must provide the employer with at least 30 days’ notice. When an employee becomes aware of a need for FMLA leave fewer than 30 days in advance, the employee must provide notice of the need for the leave either the same day or the next business day. When the need for FMLA leave is not foreseeable, the employee must comply with the School’s usual and customary notice and procedural requirements for requesting leave, absent unusual circumstances.

1101.10 Designation of FMLA Leave

Within five business days after the employee has submitted the appropriate certification form, the principal will complete and provide the employee with a written response to the employee’s request for FMLA leave using the DOL Designation Notice.

1101.11 Outside Employment

While on FMLA, the employee is restricted from other employment.

1101.12 Intent to Return to Work from FMLA Leave

On a basis that does not discriminate against employees on FMLA leave, the School may require an employee on FMLA leave to report periodically on the employee's status and intent to return to work.

All forms are available from the principal or business manager. Employees with questions about what illnesses are covered under this FMLA policy or under School sick leave policy are encouraged to consult with the principal or business manager. The School may require an employee to provide a doctor's certification of the serious health condition or other supporting documentation.

1101.13 Reinstatement

Upon return to work, the employee will be restored to his/her former position with the same rights, benefits, pay and other terms and conditions which existed prior to the leave; or to an equivalent position with equivalent rights, benefits, pay and other terms and conditions of employment.

1102 Unpaid Leave of Absence

Under special circumstances an employee may be granted an unpaid leave of absence. Employees who wish to request unpaid leave should discuss with his/her supervisor. A written narrative explaining the reason for the leave should be given to his/her supervisor. The supervisor will determine if the request can be granted with no detrimental effect on the program or service. To assure equitable application of this policy, the final approval for unpaid leave rests with the principal.

1103 Military Duty Leave

The School is committed to protecting the job rights of employees absent on military leave. In accordance with federal and state law, it is the School's policy that no employee or prospective employee will be subjected to any form of discrimination on the basis of that person's membership in or obligation to perform service for any of the Uniformed Services of the United States. Specifically, no person will be denied employment, reemployment, promotion, or other benefit of employment on the basis of such membership. The School complies with the USERRA statutes governing military leave, and those statutes shall prevail if in conflict with this policy.

If an employee leaves the employment of the School for full-time service in any branch of the United States Armed Forces, he/she will be granted an unpaid leave-of-absence. If called to active military duty, the employee may elect to continue coverage under the School group health insurance plan for employees. The amount of insurance premium for health care coverage will depend on the length of military service and absence from work and complies with federal statutes. Upon return from military duty, the employee will be eligible for reinstatement and may be reinstated to a comparable position for which he/she qualifies; he/she will not lose seniority, status or rate of pay because of the military absence. Participation in the 403(b) plan, vacation, sick leave, and holiday benefits will not accrue during a military leave of absence. The School will comply with federal statutes.

Employees should notify their supervisor as soon as they are aware of their military obligations.

Employees inducted into the military or who are members of the National Guard will be granted duty leave without pay and without loss of accumulated service as provided by the law. A request for leave must accompany a copy of the notice of induction/active duty and both are to be submitted to the supervisor as soon as the notice is received.

1104 Jury Duty

Regular full-time employees who are summoned for jury duty will continue to receive their regular salary during their active period of jury duty. The employee should communicate daily with his/her supervisor to inform the supervisor if the School must continue to make provisions for the employee's absence due to continued jury duty. Employees are permitted to retain the allowance they receive from the court for such service. Part-time and temporary employees will be given time off without pay while on jury duty service.

A copy of the summons must be presented to the employee's supervisor as soon as the summons is received. Proof of service must be submitted to the supervisor when the period of jury duty is completed.

Employees must report to work on days or parts of days when they are not required to serve as jurors.

1105 Court Appearances

Employees will be granted paid time off to appear in response to a subpoena to testify in court or to give a deposition in matters related to the School. Employees must present the subpoena to the principal as soon as possible so the principal may arrange to accommodate the absence and share the subpoena with the Department of Catholic Education prior to the employee's appearance. Employees are expected to report for work whenever the court schedule permits.

Time off for personal court appearances due to personal matters will not be paid, unless accrued annual leave is used.

1106 Time Off to Vote

The School encourages its employees to fulfill their civic duties by participating in elections. Generally, employees can find time to vote either before or after their regular work schedule. If employees are unable to vote in an election during their non-working hours, they will be granted time off to vote.

If an employee's shift begins three hours after the polls open, or if the shift ends three hours before the polls close, then the employee is not entitled to time off to vote.

Employees should request time off to vote from their supervisor on the working day preceding the election. Advanced notice is required for scheduling purposes and to minimize disruption to normal school functions.

1107 Closure for Inclement Weather/Emergencies

In the event of inclement weather (i.e., snow, ice, or other natural phenomenon) employees will be notified of the school closing or late start by 6:00 a.m. Full pay will be given to employees in the event of an all-day closing or modification of schedule.

If the School is open and an employee decides to stay home because of the inclement weather, he/she needs to request permission from their immediate supervisor. Such leave will be deducted from the employee's vacation or sick time.

1200 TERMINATION OF EMPLOYMENT

When termination occurs, the school will work to provide as smooth a transition process for both the employee and the School. See Section 202.

1201 Reduction in Staff

The School desires that its workforce remain productive and stable, but there may be times when economic, organizational, or other factors necessitate restructuring, reductions in staff, and/or other cost saving measures. In such cases, all personnel policies, including the policy prohibiting discrimination, shall be followed. When identifying employees for reduction-in-staff in a department or program, the appropriate supervisory personnel will identify employees based on a combination of factors, including, but not limited to, job qualifications, productivity, and overall employee job performance.

1202 Voluntary Resignation by Employee

Though an at-will employee may resign at any time, with or without notice, the School requests that exempt employees who voluntarily resign give at least one month's advance written notice of their intent and specify the anticipated last work day. Non-exempt employees are asked to give at least two weeks' advance notice prior to voluntary resignation. The letter of resignation should be delivered to the principal. Any accrued vacation pay will be paid on the final check following the last day worked.

The School may permit the employee to continue employment during the notice period or release the employee at any time. The employee will be paid if the School releases the employee during the notice period.

Any resignation, whether written or verbal, is irrevocable and does not need to be accepted or rejected by the School. In the case of resignation of an employee who is not the principal, only the principal may approve an employee's request to rescind a resignation once it is given. In the case of resignation of the principal, only the pastor or superintendent may approve the principal's request to rescind a resignation once it is given.

1203 Involuntary Termination or Dismissal

Dismissal refers to termination of employment at the discretion of the School, whether any formal system of discipline or warnings is utilized. Employees who are involuntarily terminated will receive any accrued vacation pay and reimbursement for any authorized accrued expenses.

1204 No Call In / No Show

An employee who fails to return to work in a timely fashion after an excused absence, leave, or time off, may be subject to disciplinary action, up to and including termination. Any employee who is absent for three days without notification will be considered to have voluntarily resigned without notice as of the close of business on the third day. Notice of absence must be made to the employee's supervisor as soon as possible and prior to the workday and must be made by phone call so that the supervisor can make needed adjustments. An email, voice mail message or text message is insufficient notice unless the supervisor and employee make alternative arrangements.

1205 Unavailability for Work

Any employee who for any reason or combination of reasons misses a total of four months of work in a twelve-month period, or a total of six months of work in an eighteen-month period, will be separated

from employment due to unavailability for work, unless requirements under the ADA or other law require otherwise.

1206 Retirement

When an employee makes the decision to retire, six (6) months' notice is requested. This request is made to assure an orderly transition for the School and the employee who is retiring.

1207 Exit Interviews

The employee's supervisor may schedule an exit interview on or before the employee's last day of work. The purpose of the exit interview is to discuss the employee's experience and satisfaction in working in the School to help improve working conditions. This also provides the employee with an opportunity to ask questions regarding his/her benefits and final payroll procedures.

1208 Termination of Benefits

1208.1 Medical / Dental / Vision Insurance / Life Insurance

Coverage terminates on the last day of the month during which termination of employment occurs.

1208.2 Vacation

Upon termination of employment, employees shall be compensated for all unused vacation hours.

1208.3 Sick Leave

Unused sick leave is not paid out at the time of termination of employment.

1208.4 Employee's 403(b) or TIAA-CREF

Employees may request a distribution or rollover of their account balance after termination of employment from the School. The actual account balance available for distribution/rollover will be subject to the vesting schedule of the Plan. To begin the distribution/rollover process, employees should contact the MetLife representative for the 403(b) plan or the Department of Catholic Education for TIAA-CREF.

1209 Return of School Property

It is the employee's and the supervisor's responsibility to see that all School property is returned to the School prior to the end of the employee's last day of work. School property includes, but is not limited to:

- School work product created during employment
- Contents of an employee's Google drive
- Lesson plans
- Curriculum documents
- Keys/Access Card
- Passwords
- Faculty grade books
- Computers and computer accessories
- ID badges
- Cell phones or PDAs owned or paid for by the School
- Student data
- Musical instruments and sound equipment
- Athletic equipment

COMMUNICATION SYSTEMS and SOCIAL MEDIA

1301 Communication Systems

The School provides communication systems and equipment necessary to facilitate efficient business operations. The telephone system, School supplied cell phones, and electronic communication systems permit employees to receive, send, store and transfer messages. Employees using these systems should have no expectation of privacy.

1302 Property of School

The communication systems hardware, software, and all messages composed, sent, or received are the property of the School. They are not the private property of any employee.

1303 Online Social Media Policy

The School recognizes that many of its employees participate in one or more varieties of internet-based social media (i.e. Facebook, Twitter, LinkedIn, YouTube, as well as blogs, wikis and related sites for social interaction and personal expression). While all employees are permitted to participate in such social media, they must nevertheless recognize the potential for their personal expression to have an adverse effect upon the reputation of the School, its employees and the Catholic Church.

Regardless of if any material is published or posted on an employee's work or personal time, the following guidelines apply:

- While the School has no desire or intent to monitor or censor the personal social media activity of employees, some online actions can affect an employee's service with the School. If it comes to light that an employee's postings have the potential to be a source of scandal for the Church, because the content violates the Code of Conduct, religious, or ethical standards of the School, the employee will be subject to disciplinary action, up to and including termination. In particular, the School will not tolerate the posting of obscene, harassing, offensive, derogatory, or defamatory comments and images that discredits or causes embarrassment to the Catholic Church, or to employees.
- A person who identifies himself/herself as an employee of the School on social media, must make it clear that the views expressed are the employee's alone and that they do not necessarily reflect the views of the School. For example, if an employee publishes a blog, he/she should post the following notice, in a reasonably prominent place: "the views expressed on this site are solely my own and do not necessarily reflect the views of my employer."
- Employees should be ethical and responsible participants in social media and should attempt to always be accurate and respectful in any postings. An employee who is moderating the content of others who post on the employee site, the employee must insist upon similar standards for those third parties.
- Employees should never disclose in social media any information gained as a result of employment with the School. This includes, but is not limited to, any information that is confidential or proprietary to the Church and School; information that a third party has disclosed to the School; and information concerning any legal matters or litigation.
- Employees may not use or reproduce any School logos or materials without permission.
- The principal should be consulted prior to posting any information on any School website or social media site.
- Pictures of students may not be posted on an employee's personal social media accounts.

Employees who violate this policy may be subject to disciplinary action that may include termination.

(See Archdiocesan Social Media Guidelines for those Working with Youth, February 15, 2017)

1304 Internet Use

The e-mail and internet systems are the property of the School. They have been provided for use in conducting School business. All communications and information transmitted by, received from, or stored in these systems are School records and the property of the School. Employees using these systems have no right of personal privacy in any matter stored in, created, received or sent over these systems.

The excessive use of these systems for personal purposes is prohibited, and it may not interfere with the employee's ability to effectively perform his/her work duties and responsibilities.

The School in its discretion as owner of the e-mail and internet systems reserves and may exercise the right to monitor, access, retrieve, and delete any matter stored in, created, received, or sent over these systems, for any reason and without the permission of any employee. Even if employees use a password to access the e-mail system, the confidentiality of any message stored in, created, received, or sent from these systems cannot be assured. Use of passwords or other security measures does not in any way diminish the School's rights to access materials on its system or create any privacy rights of employees in the messages and files on the system. Any password used by employees must be revealed to the School, as files may need to be accessed by the School in an employee's absence. Employees should not attempt to gain access to another employee's messages without the latter's permission.

1304.1 E-mail Communications

The School policies against sexual or other harassment apply fully to the e-mail and internet systems and any violation of these policies is grounds for discipline up to and including termination. Therefore, no e-mail messages should be created, sent or received if they contain intimidating, hostile or offensive material concerning race, color, religion, sex, age, national origin, disability or any other classification protected by law.

The e-mail and internet systems may not be used for any political activity in support of or in opposition to any candidate.

The e-mail and internet system may not be used to send, or receive copyrighted materials, proprietary financial information or similar materials without prior authorization from archdiocesan legal counsel.

E-mail should be checked daily. Personal email should not be used for school business. Employees should only use the school domain when communicating in the official capacity of a School employee.

1305 Right to Access

The School reserves and intends to exercise the right to review, audit, intercept, access, and disclose all communications created, received, or sent using its communication systems.

1306 Responsibility to Conserve Computer Resources

Employees connected to the network have a responsibility to conserve computer resources such as bandwidth and storage capacity. Employees must not deliberately perform acts that waste computer resources or unfairly monopolize resources to the exclusion of others. These acts include, but are not limited to, sending mass mailings or chain letters, spending excessive amounts of time on the internet, playing games, uploading or downloading unnecessary files, accessing streaming audio, videos, files, or

otherwise creating unnecessary loads on network traffic associated with non-work-related uses of the internet.

1307 Software Usage

Software is intellectual property protected by copyright rules. Employees who are found copying or to have copied software for other than backup purposes, without permission of the copyright owner, are subject to disciplinary action, up to and including termination. All computers are subject to periodic audit for the use of unlicensed software.

1308 Installation of Personal Software

No employee is permitted to install his/her own personal software on any School owned or leased computer.

1309 Computer Use Policy

These rules are in place to protect the employee and the School.

SECTION 1400 SAFETY

It is the policy of the School to provide a safe workplace for its employees, students and all who enter the School.

The School will furnish necessary equipment for employees performing work requiring personal protective equipment (i.e. gloves, safety glasses, etc.). All employees must obey every safety rule and must report any safety hazards they observe to their supervisor immediately. Failure to comply with safety regulations or reporting requirements may be a reason for termination.

1401 Workplace Violence

The School is committed to preventing workplace violence and to maintaining a safe environment. Given the increasing violence in society in general, the School has adopted guidelines to deal with intimidation, harassment, or other threats of or actual violence that may occur during business hours or on its premises.

Threatening behavior means any verbal threat or threatening behavior, whether or not it is directed at another person, which reasonably indicates may have the potential to endanger or cause future harm to students, school personnel or school property. All threatening speech or behavior should be reported immediately to the principal with as much specific and detailed information as possible. The principal will contact law enforcement of the verbal threat or act of threatening behavior. The principal will inform the superintendent. This policy includes threatening behavior made by employees, students, parents/guardians, as well as threats by customers, vendors, solicitors, or other members of the public. Threats received by voice mail, written notes or letters, or digital communications should be date stamped and saved.

Employees who encounter suspicious individuals or activities on the premises of the School should also report this immediately to the Principal, or if necessary, call 911 first. The employee will initiate lock-down or intruder procedures which are outlined in the school's emergency manual.

If the threatening behavior is from an employee, the School may suspend the employee(s), either with or without pay, pending investigation, and the employee will be asked to leave and stay away from the premises and may be subject to unlawful trespass if failing or refusing to leave or stay away from the premises pending completion of the investigation. Anyone determined to be responsible for threats of or actual violence or other conduct that is in violation of these policies and guidelines will be subject to prompt disciplinary action up to and including termination of employment.

The School will promptly and thoroughly investigate all reports of threats or actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical.

For purposes of this policy, the term "premises" means and includes any and all space occupied by School and Parish offices, and any and all buildings, grounds, offices, and rooms, for the purpose of conducting any business or activity of the School. "Premises" is further defined to include grounds, parking lots and outside facilities of School offices.

1401.1 Fights

If a fight starts between students or between adults (staff, parents, or visitors), an employee should not insert himself/herself into the fight to break it up. Remove students from the area, and in a loud

and forceful voice tell those fighting to STOP. If participants do not stop, tell them in a loud and forceful voice that the police will be called. If the fighting does not stop, call 911.

1401.2 Intoxicated Parent/Guardian

Do not release a student to a parent/guardian or other person picking up if they appear intoxicated or under the influence of a drug. Keep the student in the school's custody and call 911.

1401.3 Weapons

The presence of weapons poses a serious threat to the safety and well-being of students, staff and visitors. Therefore, possession, threat of a weapon, or use of a weapon in a school building or a vehicle on school grounds before, during, or after school or at any school-sponsored activity is subject to administrative and/or legal action. All dangerous and/or illegal weapons shall be taken from the person and reported to the police. Confiscation of weapons shall be reported to the police. Appropriate disciplinary and/or legal action may be pursued by the Administration.

(See Archdiocesan Firearms and Other Dangerous Weapons Policy, November 8, 2012)

1402 Driving Records

Employees whose duties require them to operate a motor vehicle are expected to maintain a valid motor vehicle license, and to carry at least the minimum insurance coverage required by law.

Any DUI or felony conviction while operating a motor vehicle while on School business may result in disciplinary action including immediate termination of employment.

1403 First Aid

The procedure for responding to accidents in which an injury or illness has occurred is as follows:

- Assess the situation and the surrounding area. Begin first aid, only if the surrounding area is safe. If untrained in first aid, call for assistance.
- If no assistance is available, call 911. **DO NOT MOVE THE INJURED PERSON.**
- When immediate first aid is needed because of an injury or illness, first call 911, then if there are qualified first responders in the building, seek their assistance. First responders may render aid for life-threatening conditions such as stopped breathing or excessive bleeding; treatment such as bandaging, or splinting should not be attempted.
- Persons with severe injuries or illnesses, which require emergency department facilities for treatment, are to be transported by emergency services – **NOT BY A STAFF PERSON.** A school member will accompany the ambulance to the hospital.
- An accident report should be completed as soon as practical and submitted to the principal.
- All first-aid supplies are maintained in each classroom and offices. Contact the principal to replenish supplies in the first-aid kit.
- A defibrillator is located on the 2nd floor of the CPC Building by the stairwell.
- Do not apply ointments or salves of any kind to a student's cuts or abrasions.
- Do not remove splinters from students.

1404 Reporting of Accident / Incident

Any incident or accident which occurs involving employees, students or visitors to the School shall be documented and appropriate responses made. Within 24 hours of the occurrence of the accident/incident the employee should complete the school accident report and return to the principal.

1405 Emergency Drills

The School has a comprehensive school emergency management plan to follow in the event of emergencies. Fire, tornado, earthquake, school bus evacuation, lock down and intruder drills are conducted during the course of the school year in compliance with the requirements of the Archdiocesan Department of Catholic Education. Employees should familiarize themselves with the School's emergency plan document and evacuation routes.

1406 Work-Related Injuries

Any employee injured on a job-related duty should report the injury and its cause immediately to the principal. The principal will notify the appropriate insurance carrier and complete the required forms.

1407 Communicable Disease Prevention / Universal Precautions

Employees are required to follow all universal precautions and requires all staff, volunteers, and visitors to follow established procedures to protect persons from being exposed unnecessarily to any bloodborne and airborne pathogens. Employees will be provided written information and/or training on universal precautions. Confidentiality of records and information relating to HIV testing is addressed in both federal and state laws. This information is not to be included in any records but kept in a separate and confidential file by the supervisor. Any unauthorized disclosure is a violation of state and federal law and may result in criminal sanctions as provided by statutes.

1408 Infectious Disease Control

The best control for contact illness is hand-washing with soap and water. This is the number one method of abating exposure to disease and illness.

- Employees must wash hands after bathroom use as well as before and after any activity in the kitchen area.
- Employees should also wash hands after any direct contact with bodily fluids or droplets spread by another person.
- The use of protective gloves is required for all employees who are in contact with body fluids.

1409 Air Fresheners and Candles

Lit candles and wall, plug-in air fresheners (i.e., Glade plug-ins or Bath and Body Works Wallflowers) are not permitted in the school due to fire hazards.

1410 Keys / Access Cards

No faculty-issued key/access card to the school or other facility is to be given to anyone without the principal's permission. Students should not be given faculty-issued school keys/access cards to unlock doors and/or building.

1411 Visitors in the Workplace

To provide for the safety and security of students, employees and the School facilities, only authorized visitors are allowed in the workplace. Restricting unauthorized visitors helps maintain safety standards, safeguards student and employee welfare, protects against theft, ensures security of equipment, protects confidential information, and avoids potential distractions and disturbances. No family, significant others, friends, or pets may visit employees at the workplace unless the employee obtains authorization from their appropriate supervisor and the visitor signs-in at the front office.

Visitors to the school are asked to report to the school office. As a precaution, employees must stop visitors, and ask if they need assistance. They should be asked if they have checked in at the school

office. If the employee does not know the person, the employee should walk him/her to the office. Visitors are given a visitor badge to wear.

1412 Appliances

Coffee makers, hot plates, space heaters, mini-refrigerators, microwaves, etc. may not be used in individual classrooms.

1413 Dangerous Substances

Employees must ensure that personal medications, school cleaning supplies, essential oils, etc. are appropriately stored and secured so that they are inaccessible to students.

1414 Locked Doors / Windows

Any door that opens to the outside must remain closed and locked. Exterior doors may not be propped open and left unattended. Windows must remain locked when closed.

SECTION 1500 INFORMATION FOR TEACHERS

1501 Academic

1501.1 Curriculum

The Catholic schools of the Archdiocese seek to offer excellent academic and co-curricular programs permeated by a Catholic anthropology and rooted in Truth, Beauty, and Goodness as understood in our Catholic tradition. The School is committed to preparing students for life in today's Church and society. Now more than ever, these two aspects of Catholic schools go hand in hand, "Young people of the third millennium must be a source of energy and leadership in our Church and our nation. And therefore, we must provide young people with an academically rigorous and doctrinally sound program of education" (USCCB, 2005). The essential elements of the academically rigorous and doctrinally sound program described by the USCCB require a curriculum that is rigorous, relevant, research-based, and infused with Catholic faith and traditions. (National Standards and Benchmarks for Effective Catholic Elementary and Secondary Schools, 2012).

The curriculum developed by the Department of Catholic Education in collaboration with principals, teachers, and other Catholic educators responds to this call. The curriculum has been developed by PK-12 teachers, curriculum trainers, and administrators from the Archdiocese.

Teachers are expected to teach the archdiocesan curriculum, which may be accessed at <https://sites.google.com/view/archokccurriculumworkspace/home>.

1501.2 Lesson Planning and Preparation

Effective teaching begins with thorough planning and preparation for one's classes. Teachers display their professionalism and commitment to student learning by keeping regularly updated lesson plan records shared with the principal and instructional leaders. In these lesson plans, teachers demonstrate how their content and pedagogical knowledge is bringing the archdiocesan curriculum to life, and the kinds of lesson components selected reflect the students' needs, skills and abilities. Teachers document the specific objectives of each lesson and how students will be formatively or summatively assessed in the lesson, making sure that the content of the lesson scaffolds and supports the objective. The teacher should also include the variety of resources used in the lesson, linking media used as an archive for later years and so that it is easily accessible by administrators. The structure of the lesson should support authentic student learning, should integrate Catholic social teachings and traditions, and should allow students to engage in moral and ethical decision-making in the light of these teachings.

All teachers are required to document lesson planning and preparation using the archdiocesan lesson plan template. Lesson plans should be accessible and comprehensible to administrators and substitute teachers alike. Fully documented lesson plans for the year are required for a teacher to complete end-of-year check-out.

1501.3 Classroom Environment

The environment of a classroom can have a significant impact on a child's ability to learn. Teachers are expected to foster classrooms that enable learning by creating respectful environments, establishing a classroom culture for learning, creating a space that is conducive to prayer and reflection, by effectively managing classroom procedures and student behavior, and organizing the physical space in a way that is safe, accessible, and appropriate to learning activities.

1501.4 Instruction

Quality instruction is at the heart of what we do as educators. Teachers are encouraged to provide students with quality instructional practices by implementing the following research-backed best

practices in their classrooms. Teachers communicate clearly with students, using spoken and written language, about directions and procedures, and learning goals and expectations. Teachers provide students with opportunities to construct their understandings of concepts socially, through self-discovery, and using authentic moral and ethical problem solving. Teachers ask questions of their students and have them justify their responses, engaging everyone in the room. The instructional activities should be engaging and pertinent to the lesson's objective, and the teacher adjusts the lesson based on the needs of the students in the class during the lesson. Teachers are expected to incorporate a variety of pedagogical techniques into their instruction to support the diverse learning needs of the variety of students in their classrooms. Teaching is an active profession, and during instructional times, the teacher should be interacting with the corpus of his/her classroom.

1501.5 Assessment

Teachers are expected to view assessments as a continuous conversation about a student's performance in an overall course rather than as just a mark showing how a student performed on a specific assignment. Teachers design a variety of assessments to formatively and summatively assess student progress with respect to lesson objectives, unit goals, or course outcomes. These assessments help the teacher monitor a student's progress and make adjustments to the individual student's instructional plan. When it becomes age-appropriate, teachers help students learn to track their own progress and set their own learning goals using their assessment data. Teachers regularly review and analyze student performance data sets, consulting with peers when possible, to develop appropriate strategies to respond to student achievement gaps. Teachers are expected to provide students with feedback about their performance that is timely and helps students understand their areas of weakness so that they can improve in the future.

1501.6 Professional Responsibilities

Teachers have an obligation to engage in their school and professional communities by participating in the following actions. Teachers understand and advocate for the school, its mission and its students. Teachers embrace the Catholic identity of the school. Teachers engage in reflective practices aimed at helping them become better educators. Teachers maintain accurate records and communicate with families and stakeholders. Teachers participate in a professional community where they have positive relationships with colleagues in other schools, and they attend relevant professional development opportunities. Finally, they are consistently professional, ethical, responsible and maintain appropriate licensures.

1501.7 Homework

Homework planned to meet the needs of students has an essential place in the educational program. Homework is a supplement to the lessons taught in school. Teachers are responsible for giving a reasonable amount of homework. Students' individual needs and abilities should be taken into consideration when assigning work for the class or group. Homework should be assigned with the purpose of reinforcing the day's lessons and fostering habits of independent study. Homework should be the natural outgrowth of a concept ALREADY presented in class. Written homework should be checked and returned in a timely manner. Homework assignments are noted in the teacher's lesson plans.

1501.8 Field Trips

All field trips must have the prior approval of the principal. Field trips are a privilege afforded to students in order to extend and to supplement the curriculum and are educational in nature. They are not a right, and students may be denied participation in a field trip if they fail to meet academic or behavioral standards in the class participating in the field trip or in any other class that would be missed. Students will not be permitted to leave school for a field trip unless the archdiocesan field trip permission form has been completed, signed by parent/guardian and returned to the school.

prior to the trip. Permission to take part in a field trip cannot be given over the telephone; only written permission via the official field trip permission form suffices.

The fee involved should be reasonable and the trip should be appropriate to the age level involved. An appropriate number of chaperones must accompany each trip, which will vary depending upon the age of the students and the nature of the trip.

The use of the church or school bus is the first choice for field trip transportation. If the bus is not available, parents/guardians are asked to drive vehicles and should only be assigned as many students as they have seat belts. Fifteen passenger vans may not be used. Drivers must give a copy of their valid state-issued driver's license and proof of insurance card to the school office. The School will call to verify the insurance is in effect. Drivers and chaperones must have completed the volunteer screening process and be an approved volunteer. Teachers are responsible for the collection of all fees and permission slip forms. If parents/guardians state that they cannot afford to pay, refer them to the principal.

Unscheduled stops on field trips are not permitted. Notify the cafeteria manager and specialty teachers, as soon as the trip is approved, if your class will not be present. Permission slips are taken on the trip and are returned to the school office after the trip. School employees are not permitted to be drivers for the field trip and transport students in a personal vehicle. Teachers should take a first aid kit, and a student's medication with them on the trip, and then return medication to the office after the trip.

(See Field Trip and Travel Regulations for High School and Junior High Students in Youth Ministry, Religious Education and Catholic School Programs)

1501.9 Guest speakers

Teachers are encouraged to invite guest speakers to their online classrooms. All arrangements should be discussed and approved by the Principal **BEFORE** the speaker visits. Speakers who have not been safe environment approved should always be escorted by an employee of the school. The guest must sign-in and out in the front office.

1501.10 Promotion / Retention

Students must successfully meet the academic and/or development requirements to be promoted to the next grade. Retention is a serious matter and should be considered only when there are adequate reasons to believe that the student would benefit from retention. Possible retention should be discussed with the principal first and permission given before discussing with a parent/guardian.

1501.11 Grading

Entering grades accurately and timely to the electronic gradebook is critical. The principal will periodically review each teacher's electronic gradebook. Grading shall be fair and impartial. An adequate number of grades should be taken to accurately reflect the student's achievement in each subject. Parents/guardians and students have access to the electronic gradebook. Grades should be entered to the electronic gradebook a minimum of two times a week.

1501.13 Grading Scale Kindergarten

- 4 – The student demonstrates in-depth inferences & applications that go beyond what was taught.
- 3 - The student consistently shows proficiency performing the necessary tasks.
- 2 - With help, the student can perform tasks to show proficiency.
- 1 - Even with help, the student cannot perform tasks to show proficiency.

Blank - Not assessed or introduced later

✓ - Knows letter, sound or number

1501.14 Grading Scale – Elementary

A	93-100
B	85-92
C	75-84
D	74-69
F	68-Below

1501.15 Grading Scale – High School

A	90-100
B	80-89
C	70-79
D	60-69
F	59-Below

1501.16 Progress Reports

Progress reports are sent home approximately the fifth week of each quarter. The progress report should reflect a student's grade to date, so all grading should be up-to-date before progress reports are available to families.

1501.17 Report Cards

Report cards are issued quarterly. Comments on the report card are to be objective in nature with comments made on all report cards.

1501.18 Standardized Testing

NWEA MAP Testing occurs in all grade levels three time per year as a benchmark assessment guide. The Iowa Assessment, Terra Nova or CLT is administered to students in grades 3, 5, 7 and 9. All 8th grade students take the HSPT (high school placement test.) Students in 9th grade take the PSAT and 10th grade students take the pre-ACT.

1502 Supervision when on campus, field trips, or student engagement sessions

1502.1 Classroom

Supervision of all students is the legal responsibility of the teacher. Teachers must supervise students by being both physically and mentally present. This is a serious responsibility. Teachers are subject to lawsuits if negligence can be proven. If a teacher needs to leave the room, another teacher or the teacher in the nearest classroom should be notified so that the teacher can supervise the class, if possible. For those times that a teacher must leave the room for an emergency, the classroom should have posted the behaviors expected of students in the teacher's absence. These are (1) stay in your seat (2) no talking (3) continue to do independent work.

Elementary students are to be escorted by the classroom or duty teacher to and from all locations

(cafeteria, assemblies, playground, dismissal locations, etc.)

Each teacher is responsible for ALL students. Supervision extends to the playground, cafeteria, after school care, halls, bathrooms, field trips, etc. Any time teachers are aware of a situation which needs attention, they are responsible for handling it.

Teachers should not be involved in social conversations with each other and students during supervision. Teachers should not leave students in the building after school without teacher supervision.

Teachers who provide services to students after school must make sure that students have been picked up or escorted to after school care before leaving the building. Students should never be left in the building after school without supervision.

1502.2 Recess, Student Engagement Events, Field Trips

The teacher is responsible for the behavior and safety of children on the playground. **THE TEACHER SHOULD CONTINUALLY CIRCULATE THROUGH THE AREA WHILE SUPERVISING.** If a serious injury occurs on the playground **DO NOT MOVE THE CHILD.** Notify the office and **DO NOT LEAVE STUDENTS UNATTENDED.** Before the end of the school day, the teacher must complete an accident report form for serious injuries and return to the principal. **TEACHERS SHOULD NOT BE INVOLVED IN SOCIAL CONVERSATIONS DURING Supervisory Duty.**

1502.3 Duties as Assigned

Teachers' responsibilities extend beyond classroom duties to include functions necessary for the general operation of the school, including areas such as morning supervision duty, supervision of lunch and playground, chaperone for school dances, etc. A teacher is assigned duties in these regards. Teachers should follow the schedule and be prompt for reporting for the duty. All teachers are expected to assume some non-teaching responsibilities. Examples of such activities include coaching an academic team, moderating various school activities or events.

Occasionally situations arise when a teacher must leave the building for an emergency. In some instances, there will not be sufficient time to call in a substitute teacher. On these occasions teachers may be asked to cover for another teacher during their planning period. This will be kept to a minimum, but it is a necessary back-up for all.

1503 Student Conduct

1503.1 Discipline

An important aim of Catholic education is the Christian development of each person. Discipline is necessary for the development of that person. The immediate goal of discipline is to create a favorable atmosphere for learning.

The terms punishment and discipline are not synonymous, nor are they correctly used interchangeably. Whereas punishment attempts to control people by force or reprisal, discipline is an active teaching process which at its best helps students figure out how to cope with difficulties. Discipline places the burden of responsibility on the student where it belongs and provides a supportive process for helping the student make whatever changes are necessary to resolve the situation. Discipline sets consistent, firm and reasonable limits to behavior in line with student and group needs and with appropriate expectations of student and group behavior.

Students should be encouraged to develop good habits such as courtesy, respect, kindness,

helpfulness, cooperation, and responsibility as well as good study habits. All of these are key to discipline, primarily self-discipline.

Each teacher is required to establish a set of classroom rules and consequences, which are posted in the classroom. The students should understand the meaning of these rules in the same way that the teacher does. Parents/guardians should also be given a copy of the plan at the beginning of the school year. Parents/guardians should be contacted for any behavior problems the student is encountering.

As a general rule, teachers are expected to handle the discipline problems that arise within the school day within their classroom. The principal's involvement in discipline should not be used as a threat, as it diminishes the teacher's authority. Except in cases of emergency or for immediate and serious infractions, try to notify the principal ahead of time about the possibility of being involved in a discipline situation. In cases of a severe infraction the principal should be involved immediately.

Teachers will discipline students in private with dignity and sensitivity – no physical, verbal or emotional abuse will be tolerated. Teachers will be consistent and fair in their expectations of the students.

More serious disciplinary options include lunch or after school detention, a behavior contract, in-school suspension, suspension and expulsion.

Elementary School

A student should not be excluded from PE, art, music, computers, etc. as a form of discipline or for misbehaving. Children should not be left unsupervised for student and family engagement events, in the hall or in the classroom as a disciplinary measure or while on a field trip. Misbehaving students should be separated from the group and placed with the teacher.

Teachers should refrain from entire class consequences or consequences that are difficult to carry out. Entire class silent lunches or missed recess should only be used rarely. Written consequences that allow a child to reflect upon his/her own actions are particularly useful.

Repetitive sentence writing is not allowed. Religion should never be a consequence or punishment (i.e., writing Bible verses, prayers, etc.)

High School

The student drug testing policy is in place to preserve the long-term welfare of the student and the entire school community. Drug testing is intended to prevent and address the personal and social ills caused by drug dependence and to help students who have abused drugs to become drug free. The School will provide a positive educational and counseling program for all students and will afford any student with a drug problem the opportunity to get the help needed. Care will be taken to respect a student's right to confidentiality and to involve parents/guardians of the student in addressing drug abuse problems that are discovered.

The School reserves the right to dismiss immediately any student in the event of especially grave infractions of this policy or if this is determined to be in the best interest of the student body in general or the individual student in question. The cost of the random testing is absorbed by the School while the cost of reasonable suspicion testing will be the responsibility of the

parent/guardian.

1503.2 Bullying / Harassment / Hazing

All students have a right to a safe and healthy school environment free of all forms of intimidation or harassment. Bullying, harassment, hazing and/or other threatening behavior by a student will not be accepted. Students engaging in such behavior, seriously or in jest or online, may be liable to disciplinary action up to and including suspension and/or expulsion.

The principal and/or other designated administrator will investigate all complaints of bullying, harassment or any other types of threatening behavior, whether verbal, written, or online. All allegations of bullying, harassment, hazing and/or other threatening behavior will be taken seriously and investigated in a timely manner.

1503.2 Corporal Punishment

Corporal punishment or handling students roughly is not allowed under any circumstance. Teachers who find themselves getting extremely angry or frustrated with a student, should walk away from the student. Do not touch a student when angry or extremely frustrated. Corporal punishment includes, but is not limited to: spanking, shaking, slapping, pinching, hair pulling.

1503.3 Suspension

Certain offenses, occurring on campus or off campus during school related activities, are considered more serious and may warrant suspension of a child. Only the principal may initiate suspension of a student which may last from one to twenty days.

1503.4 Expulsion

While in many cases expulsion is reserved for extremely serious or persistent misconduct, a student may be expelled from school for a single instance of on or off campus misconduct. Only the principal may initiate the expulsion of a student.

1503.5 Searches

The School reserves the right to inspect/search all school and personal property brought to school. This includes, but is not limited to, lockers, book bags, all electronic devices including cell phones, any type of container as well as automobiles driven onto the campus, and students should have no expectation of privacy from searches. Students assume responsibility for items discovered on their person, in their possession, in their vehicles, or in their book bags, purses, lockers etc.

The school retains the right to and will search and seize drugs, weapons, and other contraband that is in the possession of a student. Students who possess such contraband will be subject to disciplinary action up to expulsion.

1503.6 Due Process

The School subscribes to the democratic principle of due process. Teachers and administrators, before assigning disciplinary actions, will provide the student the opportunity to be heard and to have explained clearly the reasons for the disciplinary action taken.

Students or parents/guardians who do not agree with the action taken by the School, or that feel they have not been dealt with fairly have a right to appeal. The appeal for all grievances should go in order of the next in line of authority: teacher, assistant principal, principal, pastor, if applicable, superintendent.

1504 Buckley Amendment (FERPA)

The Family Educational Rights and Privacy Act (FERPA) is a federal law that affords parents the right to have access to their children's education records, the right to seek to have the records amended, and

the right to have some control over the disclosure of personally identifiable information from the education records. When a student turns 18 years old, or enters a postsecondary institution at any age, the rights under FERPA transfer from the parents to the student ("eligible student").

FERPA gives custodial and noncustodial parents alike certain rights with respect to their children's education records, unless a school is provided with evidence that there is a court order or state law that specifically provides to the contrary.

1504.1 Student Records

A student's permanent record is confidential. All permanent records are kept at the main school office at 7501 NW Expressway, Oklahoma City, OK 73132. At no time should the records be reviewed or completed in the students' presence. Information recorded on the permanent record is in black ink only or typed. Records may never leave the building, and they are to be returned to the office before leaving for the day. The records are completed by the classroom teacher at the end of the school year with final grades, attendance, and teacher signature.

Corrections made on the permanent record should be lined out, initialed and dated. White-out or scribbling out should not be done on a student's permanent folder.

1504.2 Release of Student Records

The school abides by the provisions of the Buckley Amendment with respect to the rights of non-custodial parents. In the absence of a court order to the contrary, the School will provide the non-custodial parent with access to the academic records and other school related information regarding their student.

If a court order specifies there is to be no information given, it is the responsibility of the custodial parent to provide the School with an official copy of the court order.

1505 Parent Communication

In many cases it will be the school that initiates communication with parents/guardians. As professional educators, we should communicate the positive as well as the negative. If parents/guardians know that the teacher recognizes the good things about their child, it is easier for them to accept the challenging behaviors teachers may have to tell them at other times.

At times it may happen that there is a conflict with a parent about their child or something they have said to us. When problems exist, teachers should try to communicate with parents/guardians in a factual manner rather than in an angry or defensive manner. This should be kept between the teacher and the parent and is not a matter for discussion with other teachers, staff or students unless they are in a position to help resolve the issue.

Teachers are to keep the principal informed of any communication with parents/guardians, which indicate a potential problem. Notes, emails or phone calls written/sent that may have a dramatic effect should be cleared with the principal first. The principal should be copied on all emails sent to parents/guardians of this nature. It is helpful if the principal is aware of the situation before the parent contacts the office. It is highly recommended that phone contact be made the very day or evening of any problems. Notes are often misinterpreted and do not always reach the parents/guardians the same day or at all. Always document all phone calls and contact with parents/guardians.

It is necessary for teachers to keep documentation of all dealings with children and parents/guardians. Phone calls, letters, notes, e-mails and conversations, etc., should be dated and outlined for each occasion. This documentation becomes invaluable in assessing certain situations

and making sound judgments. It also could be invaluable in court proceedings and custody battles. A running record of parent/guardian contacts should be recorded. These records should be kept in a secure area not available to students.

E-mails should use correct spelling, grammar, and punctuation. E-mails should be used for minor communication with parents/guardians not to explain a problem or situation. Phone calls and face-to-face conferences are more appropriate for important communications with parents/guardians rather than letters and emails.

An employee's personal cell phone should not be used to call or text a parent/guardian. Texts should only be sent if they are sent from FACTS/RenWeb, SISCVS/CANVA, or another communication tool owned by the School.

1505.1 Conferences with Parents/Guardians

Teachers should document the important elements of the conference held with each parent/guardian. Teachers are expected to conduct themselves professionally, even when dealing with an irate parent/guardian. Patient listening will usually calm the upset parent/guardian so that the situation can be discussed. If no receptivity for discussion is apparent, do not argue. Suggest that the discussion takes place with the teacher, parent and principal. Other conferences are scheduled by the teacher or parent whenever necessary.

1506 Student Well-Being

1506.1 Attendance

Daily attendance is to be accurately taken by the homeroom teacher and recorded in FACTS SIS system. Students may not complete the official attendance for the teacher. All students returning from an absence due to illness should provide a written excuse for their absence. These written excuses are turned in to the teacher via email or the SISCVS platform access. .

Students who miss two hours or fewer of school are marked tardy. Students who miss more than two hours are marked as a ½ day morning or afternoon absence.

1506.2 Student Check-out

A student may have to leave the online class before the regular dismissal time. A parent should notify the teacher of record of the reason for the absence in writing, via email.

1506.3 Administering Student Medication

Due to the Virtual aspect of the school, this policy and procedure will only affect student and family engagement activities. A student's medication will be kept by the parent in attendance or in a medical bag utilized for field trips. If onsite at a campus facility, it will be kept in the office in a locked cabinet. Only authorized school employees, designated by the principal, may administer any medication to students. A student's medication should be taken on field trips and returned to the office.

Prescription Medication

If a student must take prescription medication during the day, the original bottle, which includes the doctor's name, type of medication, and prescribed dosage, must be brought to the school office by a parent/guardian before school. The parent/guardian must complete an authorization form for the dispensing of the prescription medicine. If during the school day students need to take prescription medication, they must go to the school office and ask for the medication at which time it will be dispensed only by authorized school personnel. It will be recorded in the medicine log. When the student no longer needs the medication, it must be picked-up by the parent/guardian; it will not be sent home with the student.

Over the Counter Medication (OTC)

The school is authorized to dispense OTC medication (pain reducers, anti-inflammatory drugs, essential oils, cough drops, etc.) If a student must take over the counter medication during the day, the parent/guardian must complete an authorization form to permit the school to dispense the OTC medication. The parents/guardians must provide the OTC medication to the school in its original container. The parent-provided OTC medication is the only one that will be dispensed to students. The principal or designee will call the parent to receive permission to dispense the OTC medication. It will be recorded in the medicine log. When the student no longer needs the OTC medication, it must be picked-up by the parent/guardian; it will not be sent home with the student.

Self-Administered

With a signed permission form from the parent/guardian, a student may carry and self-administer the following medications: epinephrine injector (epi-pen), inhaler, and insulin. Parents/guardians are required to sign the permission form each year.

1506.4 Journals

Teachers who have students keep journals are required by law to read the entries within five school days. If there are questionable drawings or entries, they should be discussed with the principal immediately.

1506.5 Service Animal

See Section 208.

1506.6 Concussion

Concussions and head injuries may result from contact sports and recess play and can have serious consequences if not properly evaluated and treated. Therefore, consistent with state law, the School will inform and educate student-athletes, and their parents/guardians of the nature and risk of concussions or head injuries, including dangers associated with continuing to play after a concussion or head injury through this policy and the distribution of associated informational sheets and forms. On an annual basis, teachers, paid/volunteer coaches and team officials shall undergo concussion training provided by the CDC, the NFHS or a comparable program or resource.

If the School suspects that a student has sustained a concussion or head injury during recess, practice or competition, the coach/teacher shall immediately remove the student from participation and contact the principal and student's parent/guardian. The parent/guardian will be directed to obtain a physical and mental status examination by a licensed healthcare provider.

If a student has sustained a concussion, he/she will follow a "Return to Learn" protocol managed by the principal and teachers with consultation with parents/guardians and student.

1506.7 Suicide Intervention

Administration and teachers will receive QPR (Question, Persuade, Refer) training to learn how to recognize a person who may be in crisis. In addition, administration, staff, parents/guardians, and students will receive annual suicide awareness and prevention training. This ensures a school community where ALL staff members receive suicide training and feel comfortable with their ability to identify students at risk of harming self or others and know what to do. Training and/or materials will be made available to all new employees annually.

If any school employee or student becomes aware that a child has implied, stated, written about, or discussed (including electronic communications) possible suicidal desires or gestures, the parent/guardian will be notified immediately.

1506.8 Drug Use

Any employee who suspects or finds a student using or in possession of drugs, alcohol or tobacco products must report such findings to the principal.

1507 Teacher Responsibilities

1507.1 Confidentiality

School employees must maintain confidentiality regarding student records and/or student discussion. A student's behavior, academic standing, or home life should be discussed with others on a "need to know" basis and never with school patrons. A student's grade should be kept confidential. A student's graded work should not be posted, volunteers should not grade papers, students should not grade other student's work, and teachers should not have students call their grades aloud.

There may be times a student wants to talk about problems he/she is experiencing. Teachers should let the student know that a promise cannot be made not to share the information they tell with someone else, because there may be times when it is in the best interest of the student to do so. Teachers should do all that is possible to encourage the student to share any serious problems with his/her parent/guardian. Document the discussion and inform the principal of the situation.

1507.2 Staff Development / In-Service

Archdiocesan professional in-service days are held twice a year, usually in the fall and spring. These are required meetings days, and professional dress is required. Teachers should not be engaged in other activities such as grading papers, writing lesson plans, etc. during an in-service. Absence requires permission from the principal. Teachers not in attendance for Professional Development Days must claim this day as a personal day. If personal days have been exhausted, then this will be an unpaid day. If a teacher is sick, then the absence will be recorded as a sick day. If there are no sick days available, the teacher's pay will be docked one day of pay for each day missed.

All in-service, seminars, and training attended are recorded on a staff development form. A minimum of 15 hours is required each school year and 15 hours are required for faith development hours. Completed staff development form(s) with the certificate of attendance (if applicable) is attached and is given to the principal for signature. A copy will be placed in the personnel file with a copy returned to the teacher and a copy mailed to the Department of Catholic Education.

1507.3 Faculty Meeting

All teachers are required to attend faculty meetings. An effort is made to keep meetings to an hour, but topics/circumstances may warrant longer. Meetings dates will be announced during pre-service week. While there may not be a faculty meeting, teachers should reserve the scheduled day and time. An absence from any faculty meeting must be approved by the principal. Faculty members who are excused from attendance are responsible for knowing and implementing any decisions made during the meeting. A faculty meeting may be used for general business, an in-service or grade level meeting.

1507.4 Cell Phone Use

The use of cell phones and pagers during instruction/supervision time and during all professional meetings in session is not permitted. This also includes text messaging. Cell phones and pagers should be on mute/vibrate during the school day. At no time when teachers are supervising students should they be involved in texting or talking on their cell phone for non-school business.

1507.5 Tutoring

School employees may not provide tutoring services for individual students or small groups of

students who are enrolled in a class they teach unless such services are provided within a program that is school-approved and school-administered. These directives apply to all non-classroom educational programming and includes private music lessons and athletic training camps. Exceptions to these policies must be approved by the superintendent. As noted in Section 222, Outside Employment, employees may not have any outside employment that presents an actual or perceived conflict of interest. Therefore, under no circumstances shall any faculty/staff member:

1. Receive compensation for tutorial assistance offered to students currently enrolled in their own classroom.
2. Establish off-campus tutorial appointments and location with any student, except in the case of student infirmity, without prior approval of the school administration.
3. Act as an independent contractor for tutorial services without prior approval of the school administration.
4. Provide tutoring at the teacher's residence or the student's home. Violation of these directives may result in disciplinary action, up to and including termination.

Tutoring/remediation during the regular school year is an extension of regular instruction; no compensation should be accepted from parents/guardians. Unless approved, Teachers will not be paid by the school for tutoring.

1507.6 Copyrighted Materials

The duplication of materials covered by an exclusive copyright, including computer software and DVDs/videos, is subject to the limitations set out in the Copyright Revision Act, Section 117, of the United States Copyright Code.

1507.7 Classroom Care

Each teacher is responsible for the appearance of his/her workspace. Neat and orderly virtual classrooms are expected.

1508 Contract

Teachers are responsible for knowing the contents of their contract with the school. By signing the contract, the teacher agrees to adhere to the policies contained within the document. It is of vital importance that the teacher reads the information contained in the following handbooks since they are responsible for knowing and understanding the contents. The handbooks are the Employee Handbook, Emergency Management Handbook and Parent/Student Handbook. Each teacher is issued a contract valid for the current school year. Contract renewal is not automatic for any employee, nor is there a guarantee of renewal.

1510 Accreditation

The School is accredited by the Oklahoma State Department of Education and Cognia, Cognia is recognized by OPSAC, **A consortium of private school accrediting associations recognized by the Oklahoma State Department of Education**, and is a member in good standing.

1511 Title IX

Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy

And Grievance Procedure with Complaint Form

This Policy and Grievance Procedure applies to all applicants for admission and employment, students, and employees. The Policy and Grievance Procedure will be disseminated to all such individuals, as well as parents and legal guardians of students.

[St. Isidore of Seville Catholic Virtual School ("the School") is a Catholic faith-based community providing students with exceptional Christ-centered Catholic formation and education. Rooted in the Catholic understanding of the human person and her or his relationship with God and neighbor, the School fully embraces the teachings of the Catholic Church's Magisterium, and the School fully incorporates these into every aspect of the School, including but not limited to, its curriculum and co-curricular activities. The physical environment of the School has external signs of the Catholic tradition including images, symbols, icons, crucifixes in every classroom, liturgical celebrations, and other sacramental reminders of Catholic life. In short, every aspect of the School's life reminds students, parents, faculty and staff to intentionally consider the implications Catholic teaching has for their lives and for the formation and education of the School's students. This policy is not intended to conflict with any of the School's religious tenants or teachings of the Catholic Church. This specifically includes Catholic teachings on modesty, sanctity of life, sanctity of marriage, the theology of the body, sexual orientation, and gender identity. The School will defer to the appropriate Catholic faith leaders and teachings in implementing this policy and nothing in this policy is intended to conflict with those teachings.

A. Prohibited Discrimination, Harassment, and Retaliation of Students, Employees, and Others

The School is committed to providing a school environment that is free from unlawful discrimination, harassment, and retaliation. The School strictly prohibits and does not tolerate any unlawful discrimination, harassment, or retaliation that is also inconsistent with Catholic teaching on the basis of a person's race, color, national origin, disability, genetic information, sex, pregnancy (within church teaching), biological sex (gender) age, military status, or any other protected classes recognized by applicable federal, state, or local law in its programs and activities. The School further prohibits discrimination on the basis of sex in the recruitment and admission of students, in its education programs and activities, and in all employment-related decisions, including recruitment, application, hiring, promotion, termination, and other employment actions.

The following persons have been designated as Coordinators to handle inquiries or complaints regarding the Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy:

Name: James Bleecker

Address: 7501 NW Expressway, Oklahoma City, OK 73132

Telephone Number: 405-721-5651

Email address: jbleecker@archokc.org

Name: Page Houser

Address: 7501 NW Expressway, Oklahoma City, OK 73132

Telephone Number: 405-721-5651

Email address: phouser@archokc.org

Designated Coordinators will be responsible for:

- a. Ensuring compliance with anti-discrimination, anti-harassment, and anti-retaliation laws and regulations.
- b. Coordinating and implementing training for students and employees pertaining to anti-discrimination, anti-harassment, and anti-retaliation laws and regulations, including the training areas listed above.
- c. Investigating complaints of discrimination (unless the coordinator designates other trained individuals to investigate).
- d. Monitoring substantiated complaints or reports of discrimination, as needed (and with the assistance of other School employees, if necessary), to ensure discrimination or harassment does not recur, and that retaliation conduct does not occur or recur.
- e. Overseeing discrimination complaints.
- f. Immediately informing the Archdiocese of Oklahoma City's Director of Catholic Education and Chancellor of all complaints of discrimination and keeping them informed of all developments in each case as well as final disposition of the case.
- g. Identifying and addressing patterns and/or systemic problems, and reporting such patterns or systemic problems to the Principal, with a carbon copy to the Archdiocese of Oklahoma City's Director of Catholic Education and Chancellor.
- h. Reviewing all evidence in harassment or violence cases brought before the School's disciplinary committee or administrator to determine whether the complainants are entitled to a remedy under anti-discrimination laws and regulations that was not available in the disciplinary process.
- i. Ensuring that all investigations address whether students or employees other than the reporting student or employee may have been subjected to discrimination, harassment, or retaliation.
- j. Determining whether School employees with knowledge of allegations of discrimination, harassment, or retaliation failed to carry out their duties in responding to and reporting the allegations to the designated compliance coordinator.
- k. Recommending changes to this policy and grievance procedure.
- l. Performing other duties as assigned.
- m. Removing oneself from the Compliance Team if a conflict of interest is discovered.

The designated Coordinators will not be assigned any additional job responsibilities that may create a conflict of interest with their Coordinator responsibilities.

The School's Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy is available upon request, on the website. Further, this policy is referenced in the in the School Handbook (i.e. both student and faculty handbooks), and is available in the administration office. The contact information for the designated Coordinators is also available on the School website, in the School Handbook, and in the administration office.

The School is committed to keeping all faculty, staff, and employees safe and the School's Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy and Grievance Procedure is intended to be a guideline for an appropriate process in accomplishing that goal. The School's Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy and Grievance Procedure is expressly not incorporated into any tuition, employment, or other contract and does not confer any statutory, common law, or contractual rights. The School reserves the right to amend the Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy and Grievance Procedure.

1. Anti-Harassment

Harassment is a form of discrimination, and includes verbal, non-verbal, written, graphic, or physical conduct relating to a person's race, color, national origin, disability, age, sex, or other protected category, that is sufficiently serious to deny, interfere with, or limit a person's ability to participate in or benefit from an educational or work program or activity, including, but not limited to:

- a. Conduct that is sufficiently severe or pervasive to create an intimidating, hostile, or abusive educational or work environment, or
- b. Requiring an individual to endure the offensive conduct as a condition of continued employment or educational programs or activities, including the receipt of aids, benefits, and services.

Educational programs and activities include all academic, educational, extracurricular, athletic, and other programs of the School, whether those programs take place in School facilities, on a school bus, at a class or training program sponsored by the School at another location, or elsewhere. Programs and activities include all locations, events, or circumstances where the School exercises control over the individuals involved and the context of any alleged misconduct. The School's education programs and activities further include buildings or other locations that are part of the School's operations, including remote learning platforms, and off-campus settings if the School has substantial control over the individuals involved (e.g., a school field trip to a museum).

The following are examples of behavior that may constitute harassment:

- a. Ongoing name-calling
- b. Ongoing teasing or taunting
- c. Ongoing insults, slurs, epithets, or derogatory names or remarks
- d. Demeaning or inappropriate jokes
- e. Inappropriate gestures
- f. Graffiti or inappropriate written or electronic material
- g. Visual displays, such as cartoons, posters, or electronic images
- h. Threats or intimidating or hostile conduct
- i. Physical acts of aggression, assault, or violence
- j. Sexual advances, requests for sexual favors, or sexual jokes
- k. Offensive or obscene material
- l. Criminal offenses

This list is illustrative only, and not exhaustive. Harassment includes inappropriate conduct based upon any legally protected status. Harassment has no place at the School. It is expected that employees and students will treat one another with mutual respect and dignity. It is the responsibility of every student and employee to conduct themselves in a manner consistent with the School's policies, and to create an atmosphere free of discrimination and harassment.

Sexual harassment is also against the policy of the School. The School strictly prohibits any discrimination, harassment, or retaliation based upon an individual's sex. It includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as any unwelcome sexual advances, requests for sexual favors, or any other conduct of a sexual nature, when:

- Submission to the advance, request, or conduct is made either explicitly or implicitly a term or condition of an individual's employment, grades, academic status, or participation in the School's programs or activities;
- Submission to or rejection of the advance, request, or conduct is used as a basis for employment or academic decisions affecting such individual, including the provision of an aid, benefit, or service;
- Such advances, requests, or conduct have the purpose or effect of substantially or unreasonably interfering with an individual's work or academic performance, access to School programs or activities, or creates an intimidating, hostile, or offensive environment for the individual or others; or
- The conduct constitutes sexual assault, dating violence, domestic violence, or stalking, as defined by applicable law.

Please see Appendix A for additional detail on the definitions of sexual misconduct covered by this Policy.

The following are additional or more specific examples of conduct that may constitute sexual harassment:

- a. Unwelcome sexual advances or propositions
- b. Intentional indecent exposure in any form
- c. Requests or pressure for sexual favors
- d. Unwelcome comments about an individual's body, sexual activity, or sexual attractiveness
- e. Physical contact or touching of a sexual nature, including touching intimate body parts and inappropriate patting, pinching, rubbing, or brushing against another's body
- f. Physical sexual acts of aggression, assault, or violence, including criminal offenses (such as rape, sexual assault or battery, and sexually motivated stalking), against a person's will or where a person is incapable of giving consent due to the victim's age, intellectual disability, or use of drugs or alcohol
- g. Requiring sexual favors or contact in exchange for aids, benefits, or services, such as grades, awards, privileges, promotions, etc.
- h. Sex-based harassment; acts of verbal, nonverbal, written, graphic, or physical conduct based on sex or sex-stereotyping, but not involving the conduct of a sexual nature
- i. Sexual harassment, sexual assault, stalking, dating violence, and domestic violence
- j. Strangulation

This list is illustrative only, and not exhaustive.

2. Anti-Retaliation

The School prohibits retaliation, intimidation, threats, coercion, or discrimination against any person for the purpose of interfering with any rights under this Policy, including the right to oppose discrimination (including harassment), or for participating in the School's discrimination complaint process, making a complaint, testifying, assisting, or participating in any manner in an investigation, proceeding, or hearing related to such conduct. Retaliation is a form of discrimination. Reports made in good faith will not result in any discipline.

The School will take immediate steps to stop retaliation and prevent its recurrence against the alleged victim and any person associated with the alleged victim, including the reporting individual. These steps will include but are not limited to: notifying students, employees, and others that they are protected from retaliation, ensuring that all involved individuals know how to report future complaints, and initiating follow-up contact with the complainant to determine if any additional acts of discrimination, harassment, or retaliation have occurred. If retaliation occurs, the School will take prompt and

appropriate responsive action, including disciplinary action up to and including expulsion or termination, if applicable.

B. Grievance Procedures

These Grievance Procedures are intended to provide for the prompt and equitable resolution of all student and employee complaints alleging any action that is prohibited by the School's Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy.

Complaint

If you believe you are a victim of any conduct that is prohibited by this Policy, or if you believe this Policy has been violated in any way, you should immediately report it pursuant to this Policy and the School's Grievance Procedures. You can help the School prevent and correct alleged misconduct. Reports should be made to the School's designated Coordinators. Complaints should be made in writing, when possible. The complaint can be made to the coordinator in person, by mail, or by electronic mail. Your complaint should be as detailed as possible, including the names of individual(s) involved, any witnesses, dates, times, and locations of all incidents, and a factual description of the incident(s).

As a condition of employment with the School, all School personnel and employees must immediately report alleged violations of this Policy, complaints or reports of violations of this policy, and all incidents of alleged discrimination to the School's designated Coordinators, even if doing so may result in duplicative efforts. All employees of the School are charged with this obligation. Failure of personnel/employees to abide by this requirement will result in disciplinary action, up to and including termination.

If the school has notice about possible discrimination, harassment, or retaliation, including violence, and any conduct that would violate this Policy, the School will conduct a prompt, thorough, and impartial investigation to determine whether unlawful conduct occurred (see the School's "Grievance Procedures"), and take appropriate interim measures, as necessary. The School may receive notice through an oral report, written report, personal observation by an employee, anonymous report, or other means. If the School determines that unlawful harassment occurred, the School will take prompt and effective action to eliminate the harassment, prevent its recurrence, and remedy its effects, as appropriate. If harassment or violence that occurs off school property creates a hostile environment at school, the School will follow this Policy and Grievance Procedure.

Supportive Measures

The Coordinator may determine that supportive measures should be provided to the complainant, and if so, the Coordinator will promptly contact the complainant to discuss the availability of such supportive measures and consider the complainant's wishes. Interim measures may also be appropriate for the respondent. For example, the Coordinator may determine that the respondent should (i) be removed on an emergency basis from education programs and activities based on a safety and risk analysis, or (ii) be placed on administrative leave during the pendency of the investigation and grievance process. Supportive measures are designed to: preserve access to the School's programs and activities; protect the safety of all parties; and deter further misconduct. Such supportive measures may include counseling, schedule adjustments, extensions of deadlines, escort services or additional supervision, no-contact orders, leaves of absence, and other similar measures. The implementation of supportive measures will remain confidential to the extent possible. The Coordinator is responsible for the effective implementation of supportive measures, and may implement such measures where no formal complaint has been submitted to the School, or where the complainant does not wish to pursue to grievance process, if the circumstances warrant.

Parents and Guardians

Consistent with applicable state and local law, a student's parent or guardian will be permitted to exercise the rights granted to their child under this School's policy, whether such rights involve requesting supportive measures, filing a formal complaint, or participating in a grievance process. A student's parent or guardian will also be permitted to accompany the student to meetings, interviews, and hearings, if applicable, during the grievance process in order to exercise rights on behalf of the student.

Notice of Receipt of Complaint

Once the School receives notice that discrimination, harassment, retaliation, or other misconduct under this Policy has occurred, the School will respond promptly and effectively. Upon receipt or submission of a written complaint, the Coordinator will provide written notice to the known parties of the following:

- (A) the School's Grievance Procedures;
- (B) the allegations constituting a potential violation of these Policies, including details of the identities of the parties, the alleged incident(s), and dates and locations of the alleged incident(s), if known;
- (C) the fact that the respondent is presumed not responsible for the allegations until a Determination is made at the conclusion of the grievance process;

- (D) the fact that a determination regarding responsibility will be made at the conclusion of the grievance process;
- (E) that the parties have the right to an advisor of their choice present at any meeting or proceeding, who may be, but is not required to be, an attorney; and
- (F) the parties' opportunity to request inspection and review of evidence obtained as part of the investigation.

During the course of the investigation, should the Coordinator discover allegations that were not included in the initial notice to the parties, the Coordinator may decide to investigate such allegations. If the Coordinator determines that additional allegations require investigation, the Coordinator will provide written notice of the additional allegations to the parties, if and when known.

Dismissal of Complaint

If at any time during the investigation it is determined that no violation of this Policy or no unlawful discrimination, harassment, or retaliation has occurred, the School will dismiss the complaint or any allegations in the complaint. However, it is possible that the alleged conduct may constitute a violation of other School policies, including the School's code of conduct, and as such may be further investigated under those policies. A complaint may also be dismissed if: (i) the complainant notifies the Coordinator in writing that he or she wishes to withdraw the complaint or any allegations therein; (ii) the respondent is no longer enrolled in or employed by the School; or (iii) specific circumstances prevent the School from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein. The School may nevertheless investigate if the Coordinator determines it is necessary in light of a health or safety concern. If a complainant refuses to participate in the investigation after making a complaint, it may result in a dismissal of the complaint. However, the School may proceed with an investigation as the circumstances may allow.

Investigation

Once the School receives a grievance, complaint, or report alleging discrimination, harassment, or retaliation, or becomes aware of possible discriminatory conduct, the School will conduct a prompt, thorough, and impartial investigation to determine whether unlawful conduct occurred. Throughout the investigation process, the School will undertake an objective evaluation of all relevant evidence, treat the parties equitably, ensure that investigators and decisionmakers are free from conflicts of interest or bias, and work through the grievance process with reasonably prompt time frames. The Coordinator will conduct the investigation unless the Coordinator or the School determines that an outside, third-party should conduct the investigation. If necessary, the School will take immediate, interim action to provide Supportive Measures and prevent further potential discrimination, harassment, or retaliation during the

pending investigation. The Complainant will be notified of his or her options to avoid contact with the Respondent, such as changing a class or prohibiting the alleged harasser from having any contact with the alleged victim pending the result of the School's investigation. The School will minimize any burden on the Complainant when taking interim measures to protect the Complainant.

The investigation may include gathering physical, electronic, and other evidence, and interviewing witnesses and parties. Individuals who are evasive, obstructionist, or who do not fully cooperate in the investigative process may be subject to disciplinary action, up to and including expulsion or termination. The parties will receive advance notice before they are interviewed for investigative purposes.

The parties may elect to have an advisor of their choice for purposes of the investigation and grievance proceedings. Advisors are welcome to attend meetings, interviews, and any grievance proceedings, but are not permitted to speak in place of the parties. The role of the advisor is narrow in scope: the advisor may attend any interview or meeting connected with the grievance process that the party whom they are advising is invited to attend, but the advisor may not actively participate or intervene in interviews or meetings and may not serve as a proxy for the party. In addition, while advisors may provide guidance and assistance throughout the investigation and grievance process, all written submissions must be authored by the student or employee.

The School will investigate all complaints received, even if an outside entity or law enforcement agency is also investigating a complaint involving the same facts and allegations. The School will not wait for the conclusion or outcome of a criminal investigation or proceeding to begin an investigation required by this Grievance Procedure. If the allegation(s) involve possible criminal conduct, the Coordinator will notify the complainant of his or her right to file a criminal complaint. No School employee shall dissuade the complainant from filing a criminal complaint either during or after the School's investigation.

The School will attempt to complete its investigation within thirty (30) school days after receiving a complaint or report, unless extenuating circumstances exist. Extenuating circumstances may include the unavailability of witnesses, witnesses refusal to cooperate, additional time needed because of the complexity of the investigation, the need for outside experts to evaluate the evidence (such as forensic evidence), or multiple complainants or victims. Extenuating circumstances do not include summer vacation, and if a designated compliance Coordinator or investigator is unavailable, another coordinator or trained employee will be designated to conduct the investigation. If extenuating circumstances exist, the timeframe to complete the investigation will be extended as needed, keeping in mind the goal of prompt and effective resolution. Periodic status updates will be given to the parties, if necessary.

Informal Resolution

When a formal complaint has been filed, at any time during the investigation and grievance proceeding and prior to a determination regarding responsibility, the parties may agree to resolve the matter informally. The Coordinator or the School may facilitate an informal resolution process, subject to obtaining the parties' voluntary, written consent. In addition, although the parties may not contact one another for purposes of direct mediation, they may communicate through their advisors or through the Coordinator for purposes of reaching an informal resolution.

Informal resolution is not permitted in a situation where an employee is alleged to have sexually harassed a student or where an employee or student is alleged to have sexually assaulted another person.

If the parties consent to an informal resolution process, it will be facilitated through the Coordinator or an outside, third-party, free from conflicts of interest and bias. Each party will receive written notice prior to the informal proceeding, disclosing: (A) the allegations; and (B) the requirements of the informal resolution process. Informal resolution may involve pursuit of individual or community remedies, supported direct conversations, mediation, indirect action by the facilitator of the informal process, or other forms of resolution tailored to the needs of the parties. Informal resolution may also be used to reach agreed upon disciplinary sanctions.

If a resolution satisfactory to the parties is reached, through an informal resolution proceeding or otherwise, the Coordinator will prepare a written document indicating the resolution of the matter, to be signed by both parties, and the investigation and/or proceeding will then be closed. The written document indicating resolution will be maintained by the School as a confidential record.

Preliminary Review Prior to Investigative Report

Prior to completion of the investigative report, the School will send to each party and the party's advisor, if any, all evidence subject to inspection and review in an electronic format or a hard copy for review. The parties will have ten (10) calendar days to submit a written response, which the investigator will consider prior to completion of the investigative report.

Investigative Report

The designated compliance Coordinator (or designated investigator) will complete an Investigative Report, which will fairly summarize all relevant evidence gathered during the investigation. If someone other than the designated compliance Coordinator conducted the investigation, the compliance Coordinator will review, approve, and sign the Investigative Report.

The Report will be sent to each party and the party's advisors, if any, for the party's review and written response. The parties will also be entitled to submit written, relevant questions that the party wants asked of any party or witness prior to any determination regarding responsibility, provide each party with the answers, and allow for additional, limited follow-up questions from each party. The response to the Investigative Report and written questions, if any, must be sent to the Coordinator or designated investigator within ten (10) calendar days of the party's receipt of the Investigative Report. The compliance Coordinator (or designated investigator) will have discretion on which additional information to provide and to determine which questions may be relevant and appropriate.

The School will maintain relevant evidence obtained during the investigation, including the Investigative Report, and any witness statements, interview summaries, and any transcripts or audio recordings pertaining to the investigation as required by any applicable law.

Determination Regarding Responsibility

The School will utilize a "preponderance of the evidence" standard when determining whether any violation of this Policy occurred. The decision-maker, who will not be the same person as the Coordinator or the investigator, will issue a written determination regarding responsibility (the "Determination"). The written Determination will include:

- (A) identification of the allegations potentially constituting a violation of this Policy;
- (B) a description of the procedural steps taken from the receipt of the allegations or complaint throughout the entire investigation and grievance process;
- (C) findings of fact supporting the Determination;
- (D) conclusions regarding the application of the School's Policy or code of conduct;
- (E) a statement of and rationale for the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions to be imposed, and whether any remedies designed to restore or preserve equal access to the School's education program or activity will be provided; and
- (F) the procedures and permissible bases for appeal.

The Determination will be provided to the parties at the same time. The Determination becomes final the date on which an appeal would no longer be considered timely, or upon the conclusion of an appeal with the issuance of the Decision on Appeal.

The Coordinator will be responsible for implementing any remedies set forth in the Determination.

Appeals

Both parties are entitled to appeal the Determination, including any sanctions, or the School's dismissal of a formal complaint or any allegation therein. Appeals must be made within ten (10) School days after the party receives the Determination or the dismissal.

The grounds for appeal are as follows:

- (A) Procedural irregularity that affected the outcome of the matter (i.e., a failure to follow the School's own procedures);
- (B) New evidence that was not reasonably available at the time the Determination regarding responsibility or dismissal was made that would affect the outcome of the matter; or
- (C) The Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against an individual party, or for or against complainants or respondents in general, that affected the outcome of the matter.

The submission of an appeal stays any sanctions for the pendency of the appeal. Supportive measures, including remote learning opportunities, remain available during the pendency of the appeal. If a party appeals a Determination, the School will notify the other party in writing of the appeal as soon as is practicable; however, the time for appeal shall be offered equitably to all parties and shall not be extended for any party solely because the other party filed an appeal. The non-appealing party may submit a written response to the appeal within five (5) school days after receiving notice of the appeal. Appeals will be decided by the Appeals Team, who will be free of conflicts of interest and bias, and who have not and will not serve as investigator, Coordinator, or decision-maker in the same matter.

The Appeals Team will review the appeal, any written response thereto, all evidence gathered during the investigation, investigative documentation, and the Determination, and will conduct additional investigation, if necessary, at the Appeals Team's sole discretion. The Appeals Team will then issue a written Decision on Appeal within thirty (30) school days after receiving the appeal. The Decision on Appeal will describe the result of the appeal and the rationale for the result, and shall be sent to all parties at the same time. The Decision on Appeal is final. (If a member of the Appeals Team is the subject of the complaint or is involved in the investigation, a new member will be appointed.)

Sanctions and Remedies.

Sanctions. Sanctions are imposed against the wrongdoer/harasser in an effort to stop and/or correct his/her conduct, prevent any recurrence of misconduct, deter any future misconduct, and remedy the effects of the misconduct.

Sanctions may include, but are not limited to: any level of disciplinary action, such as a verbal warning, written warning, suspension, administrative leave, demotion, termination of employment, expulsion, suspension or dismissal from School, modification of schedule, reduction or elimination of financial or other benefits, and no-contact orders.

Remedies. Remedies are actions taken to overcome the effects of the misconduct. Remedies provided to the complainant are designed to restore or preserve that individual's educational or employment access and opportunities. Remedies may include the same individual services provided as Supportive Measures, or other, additional items. Other remedial measures may be taken to ensure learning and working environments that are free from misconduct, such as, but not limited to, training and counseling support services. Remedies will be prompt, age-appropriate, effective, tailored to the specific situation, and may include a change in the student's seating assignment or class, a change in an employee's work area, prohibiting the alleged harasser from having any contact with the alleged victim pending the result of the School's investigation, counseling, health, and mental health services, and other remedies, such as those listed below.

Remedies for an individual further include but are not limited to:

- a. Providing an escort to ensure the complainant can move safely between classes and activities.
- b. Ensuring the complainant and alleged harasser do not attend the same classes.
- c. Providing academic support services, such as tutoring, if desired.
- d. Arranging for the complainant to retake a course or withdraw from a class without penalty, including ensuring that any changes do not adversely affect the complainant's academic record.

The School may also provide Remedies for the School or broader student population, including, but not limited to:

- a. Providing resources to all students or employees affected by sexual harassment or sexual violence so that they can access comprehensive victim services, and notifying students and employees of community counseling, health, mental health, and other services.
- b. Providing additional training to the School's designated compliance coordinators and other employees who are involved in addressing, investigating, or resolving complaints of discrimination, harassment, and retaliation, to better respond to specific types of harassment and violence.
- c. Informing students and employees of their options to notify law enforcement authorities, including school and local police, and the option to be assisted by School employees in notifying those authorities.
- d. Creating measures of feedback from students, employees, and School officials to identify strategies for ensuring that students and employees:
 - i. Know and understand the school's prohibition against discrimination, harassment, and retaliation.
 - ii. Recognize acts of discrimination, harassment (including acts of violence), and retaliation when they occur.
 - iii. Understand how to report any incidents of discrimination, and to whom they must be reported.
 - iv. Know the connection between alcohol and drug abuse and harassment or violence based on sex or other protected characteristics.
 - v. Feel comfortable that School officials will respond promptly and equitably to reports of discrimination, harassment (including violence), and retaliation.
- e. Conducting periodic assessments of student or employee activities to ensure that the practices and behavior of students or employees do not violate the School's policies against anti-discrimination, anti-harassment, and anti-retaliation.
- f. Conducting, in conjunction with students or employees, a "climate check" to assess the effectiveness of efforts to ensure that the School is free from discrimination, harassment (including violence), and retaliation, and using the resulting information to inform future proactive steps that will be taken by the School.

Confidentiality

The identity of the complainant will be kept confidential, to the extent that a fair and thorough investigation can be completed. The School will notify the complainant of the anti-retaliation provisions of applicable laws, and that the School will take steps to prevent retaliation and will take prompt and corrective responsive actions if retaliation occurs.

At the same time, the School will evaluate a confidentiality request in the context of its responsibility to provide a safe and nondiscriminatory environment for all students and employees. In some cases, the School may be required to report alleged misconduct or discrimination, such as sexual harassment

involving sexual violence, to local law enforcement or other officials, and the School may not be able to maintain the complainant's confidentiality. The School will inform the complainant that it cannot ensure confidentiality, if applicable.

If a complainant requests confidentiality or asks that the complaint not be pursued, the School will take all reasonable steps to investigate and respond to the complaint consistent with the request for confidentiality or the request not to pursue an investigation, as long as doing so does not prevent the School from responding effectively to the harassment and preventing harassment of other students. In some instances, the School may pursue an investigation with a complaint signed by the Coordinator. If a complainant or third party insists that his/her name or the complainant's name not be disclosed, the School will inform the complainant that its ability to respond may be limited. For example, the School would be unable to provide Supportive Measures without knowing the complainant's identity. Where a complainant desires Supportive Measures, the complainant's identity may be kept confidential unless disclosing the complainant's identity is necessary to provide Supportive Measures. Where a complainant desires to initiate a grievance process, the complainant cannot remain anonymous or prevent the complainant's identity from being disclosed to the respondent. A respondent has the right to, and must be, notified of the complainant, complaint and details of the allegations, and the ensuing investigation in order to provide the respondent with an adequate opportunity to respond. Even if the School cannot take disciplinary action against the alleged harasser, the School will pursue other steps to limit the effects of the alleged harassment and prevent its recurrence, if warranted.

The duty of confidentiality has three exceptions: if disclosure is (1) permitted under FERPA, (2) required by law, or (3) necessary to carry out the purposes of this Policy and the grievance process.

Privacy of Records

Any complaint, the allegations involving misconduct, the evidence gathered during the investigation, the witnesses interviewed, and any records, reports, or documents generated in the process of the investigation and grievance proceeding, including at the appeals levels, are all confidential, not open to the public, and must be maintained as confidential records by the School. Any breach of confidentiality is grounds for disciplinary action.

Conflict of Interest or Bias

If at any point during the investigation or grievance process a party has concern about a conflict of interest or bias for or against any complainant or respondent, the party should report such concern to **James Bleecker, Associate Director of Catholic Education**. The School wants to ensure an impartial investigation and grievance process for all employees and students, and that all Coordinators,

investigators, and decision-makers in the investigative and grievance process, including the Appeals Team, are unbiased and free from conflicts of interest. If any Coordinator, investigator, or decision-maker identifies his/her own conflict of interest or bias, they must immediately self-report the concern to **Page Houser, Coordinator of Safe Environment**. Where concerns regarding conflicts or bias are validated, the School will remove the conflicted or biased individual from the matter, and appoint someone else.

Training

The School will ensure that all employees, including but not limited to: officials, administrators, teachers, substitute teachers, counselors, coaches, assistant coaches, paraprofessionals, aides, bus drivers, school volunteers, and school law enforcement officers, are adequately trained so they understand and know how to identify acts of discrimination, harassment, and retaliation, and how to report it to appropriate School officials or employees. This training will include, at a minimum, the following areas:

- a. The current legal standards and compliance requirements of anti-discrimination, anti-harassment, and anti-retaliation federal, state, and local laws and regulations, including the definitions of and several specific examples of discrimination, harassment (including acts of violence because of a person's sex or other protected characteristics), and retaliation.
- b. The School's current anti-discrimination, anti-harassment, and anti-retaliation notices, policies, grievance procedure, and discrimination complaint form, including the specific steps and timeframes of the investigative procedures, and the School's disciplinary procedures.
- c. Identification of the School's designated compliance coordinators and their job responsibilities.
- d. Specific examples and information regarding how to report complaints or observations of discrimination, harassment, or retaliation to appropriate School officials or employees. In addition, the School will emphasize that employees, students, third parties, and others, should not be deterred from filing a complaint or reporting discrimination. For instance, if a student is the victim of sexual violence, a form of sexual harassment, but the student is concerned that alcohol or drugs were involved, school staff should inform the student that the School's primary concern is student safety that any other rules violations will be addressed separately from the sexual violence allegation and that the use of alcohol or drugs never makes the victim at fault for sexual violence.
- e. Potential consequences for violating the School's anti-discrimination, anti-harassment, and anti-retaliation policies, including discipline.
- f. Potential remedies, including immediate, interim remedies, to eliminate the discrimination, harassment, and retaliation, prevent its recurrence and remedy its effects.

- g. A description of victim resources including comprehensive victim services, to address acts of discrimination and harassment, including acts of violence because of a person's sex or other protected characteristics, and a list of those resources for distribution to trainees.

In addition, the School shall ensure that employees designated to address or investigate reports of discrimination, harassment, and retaliation, or carry out responsibilities under this Policy and Grievance Procedure, including designated compliance Coordinators, investigators, decision-makers, the Appeals Team, and any employee facilitating an informal resolution process, will receive additional specific training on the definitions of misconduct covered by this Policy and Grievance Procedure, the scope of the School's education programs and activities, how to promptly and effectively investigate, conduct a grievance process, and respond to complaints and reports of discrimination, how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias, how to make decisions on issues of relevance regarding questions and evidence, how to fairly summarize relevant evidence, and to know the School's Grievance Procedures and the applicable confidentiality requirements.

Preventive Measures

The School will publish and widely distribute on an ongoing basis a notice of nondiscrimination in electronic and printed formats, including prominently displaying the notice on the School's website and posting the notice at each building in the School. The School also will designate an employee to coordinate compliance with anti-discrimination laws and widely publish and disseminate this grievance procedure, including prominently posting it on the School's website, at each building in the School, reprinting it in School publications, such as handbooks, and sending it electronically to members of the school community. The School will provide training to employees and students at the beginning of each academic year in the areas identified in the Training section, above.

The School also may distribute specific harassment and violence materials including a summary of the School's anti-discrimination, anti-harassment, and anti-retaliation policy and grievance procedure, and a list of victim resources, during events such as school assemblies and back to school nights, if recent incidents or allegations warrant additional education to the school community.

Appendix A

Definitions

Sexual Harassment, as an umbrella category, includes the actual or attempted offenses of sexual harassment, sexual assault, domestic violence, dating violence, and stalking, and is defined as:

Conduct on the basis of sex that satisfies one or more of the following:

1. Quid Pro Quo:
 - a. an employee of the school/district, who
 - b. conditions the provision of an aid, benefit, or service of the school/district,
 - c. on an individual's participation in unwelcome sexual conduct.
2. Sexual Harassment:
 - a. unwelcome conduct,
 - b. determined by a reasonable person,
 - c. to be so severe, and
 - d. pervasive, and,
 - e. objectively offensive,
 - f. that it effectively denies a person equal access to the school's/district's education program or activity.
3. Sexual assault:
 - a. an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation.
 - b. This includes any sexual act, including rape, sodomy, sexual assault with an object, or fondling directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.
4. Non-Forcible Sex Offenses:
 - a. Incest:
 - i. Non-forcible sexual intercourse,
 - ii. between persons who are related to each other,
 - iii. within the degrees wherein marriage is prohibited by Oklahoma law.
 - b. Statutory Rape:

- i. Non-forcible sexual intercourse,
 - ii. with a person who is under the statutory age of consent of 16.
- c. Dating Violence:
 - i. Violence,
 - ii. committed by a person,
 - iii. who is in or has been in a social relationship of a romantic or intimate nature with the victim; and
 - iv. where the existence of such a relationship shall be determined based on consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition—
 - v. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
 - vi. Dating violence does not include acts covered under the definition of domestic violence.
- d. Domestic Violence:
 - i. Felony or misdemeanor crimes of violence
 - ii. committed by a current or former spouse or intimate partner of the victim, or
 - iii. by a person with whom the victim shares a child in common, or
 - iv. by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner, or
 - v. by a person similarly situated to a spouse of the victim under the domestic or family violence laws of Oklahoma or
 - vi. by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of Oklahoma.
- e. Stalking:
 - i. engaging in a course of conduct,
 - ii. directed at a specific person,
 - iii. that would cause a reasonable person to
 - 1. fear for the person's safety or the safety of others or
 - 2. Suffer substantial emotional distress.
 - iv. Stalking includes cyber-stalking.



Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Complaint Form

PURPOSE: The purpose of this complaint form is to gather the essential basic facts of alleged actions or misconduct involving complaints based on sex discrimination, including complaints of sexual harassment or sexual violence, in violation of the prohibitions in the Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy. This form is use so any complaints can be resolved as expediently and appropriately as possible. This form only applies to complaints involving complaints of sex discrimination, including complaints of sexual harassment or sexual violence covered by the Anti-Discrimination, Anti-Harassment, Anti-Retaliation Policy and Grievance Procedure.

INSTRUCTIONS: Individuals alleging sex discrimination, including complaints of sexual harassment or sexual violence, or retaliation in violation of the Anti-Discrimination, Anti-Harassment, Anti-Retaliation Policy and Grievance Procedure and requesting review are required to complete this form and submit it to the appropriate administrator as soon as possible after the occurrence of the alleged discrimination or retaliation:

Contact our Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy Coordinator:

Name:

Email:

Phone:

1. Name of Complainant:

Contact information:

Student Grade:

Employee Job Title and Office Location:

2. Today's Date: _____

3. Nature of Grievance:

Please describe the action you believe may be sex discrimination or retaliation, including complaints of sexual harassment or sexual violence, in violation of the Anti-Discrimination, Anti-Harassment, Anti-Retaliation Policy and identify with reasonable particularity any person(s) you believe may be responsible. Please attach additional sheets, if necessary:

4. When did the actions described above occur?

5. Are there any witnesses to this matter? (Please circle) Yes No

If yes, please identify the witnesses:

6. Did you discuss this matter with any of the witnesses identified in Item 4?

(Please circle) Yes No

If yes, please identify: Person to whom you have

spoken: _____ Date: _____

Method of communication:

7. Have you spoken to any administrator(s) or other school employee(s) about this matter? (Please circle) Yes No

If yes, please identify: Person to whom you have

spoken: _____

Date: _____

Method of communication;

8. Please describe the result of the discussion(s) identified in Item 6:

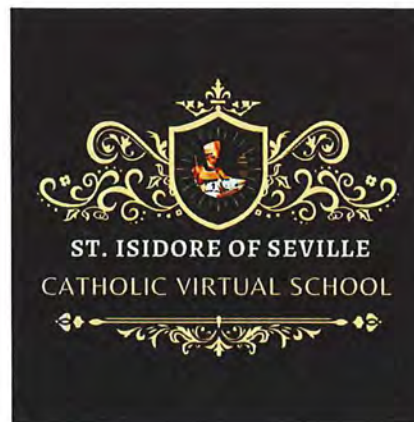
PLEASE ATTACH ANY STATEMENTS, NAMES OF WITNESSES, REPORTS, OR
OTHER DOCUMENTS WHICH YOU FEEL ARE RELEVANT TO YOUR COMPLAINT.

I certify that the foregoing information is true and correct.

Print Name

Signature

Date



Section 13: Appendix D Enrollment Chart



Appendix D: Enrollment Chart

Minimum Enrollment

Grades Served: K-12

Grade Levels	2024-25	2025-26	2026-27	2027-28	2028-29
K	10	15	20	40	85
1	10	15	20	40	85
2	20	25	25	45	85
3	25	30	30	55	85
4	30	35	50	65	80
5	30	35	50	70	80
6	35	45	65	75	85
7	40	50	65	85	85
8	40	50	65	85	95
9	40	50	65	85	95
10	40	50	65	85	95
11	40	50	65	85	95
12	40	50	65	85	100
K-5 Totals Above	125	155	195	315	500
6-8 Totals Above	115	145	195	245	265
9-12 Totals Above	160	200	260	340	385
Totals Above	400	500	650	900	1150

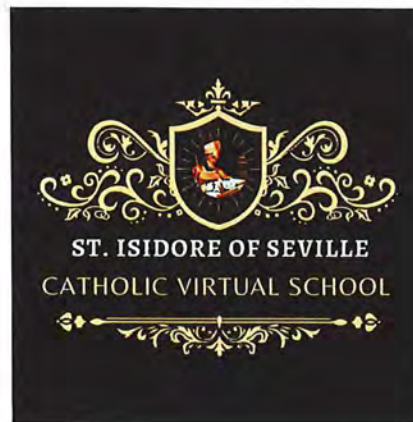


Appendix D: Enrollment Chart

Minimum Enrollment

Grades Served: K-12

Grade Levels	2024-25	2025-26	2026-27	2027-28	2028-29
K	15	15	50	60	60
1	15	15	50	75	75
2	25	25	60	85	90
3	30	30	65	85	90
4	35	35	75	95	125
5	35	35	80	100	135
6	45	45	80	100	135
7	50	50	90	110	135
8	50	50	90	110	135
9	50	50	90	110	130
10	50	50	90	110	130
11	50	50	90	110	130
12	50	50	90	100	130
K-5 Totals Above	155	155	380	500	575
6-8 Totals Above	145	145	260	320	405
9-12 Totals Above	200	200	360	410	520
Totals Above	500	500	1000	1250	1500



Section 13: Appendix E: School Calendar

School Name: St. Isidore of Seville Catholic Virtual School

Jul-24						
S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			
9-11- New Principal Orientation 31- Principal Meeting all schools						
Student Days		0				
Teacher Days		0				

Aug-24						
S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31
2- Diocesan New Teacher Orientation 7- Teacher Pre-Service Day Faculty Retreat Day On Site PD Day First Day of School, (Early Dismissal at 1:00)						
Student Days		15				
Teacher Days		18				






Sep-24						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					
2-Labor Day; School Closed 13-Teacher Inservice PD Day						
Student Days		20				
Teacher Days		21				

Oct-24						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		
4- End of Qtr 1 Parent-Teacher Conferences 11-14-Fall Break 15- Teacher PD Day, (Elementary Only)						
Student Days		21				
Teacher Days		22				






Nov-24						
S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
6- Holy Fire Middle School Retreat, all middle school students across archdiocese 16-20- Thanksgiving Break						
Student Days		16				
Teacher Days		16				

Dec-24						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				
18- End of 2nd Qtr; Early Dismissal opt. Jan 5-Christmas Break, School Closed						
Student Days		15				
Teacher Days		15				

DIOCESAN ASSIGNED DATES

-  Holiday/School closed
-  Professional Development/School Closed (5)
-  Diocesan Meetings--New Principal Orientation, New Teacher Orientation, Benefits, etc.
-  Fall, Thanksgiving & Spring Breaks
-  First and Last Days

SCHOOL ASSIGNED DATES

-  School in session (175)
-  Parent-Teacher Conference Day (School Closed only)
-  Teacher Work Days--pre- or post-service work days (4-6)
-  School Event that potentially affects other schools (fundraising, long-standing traditions, graduations, etc.)
-  Early Release

Jan-25						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	
1-3- New Years Holiday, School 6- Teacher Inservice Closed 18-Dr. Martin Luther King, School Closed 21- Teacher PD Day						
Student Days		17				
Teacher Days		19				

Feb-25						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	
17-Teachers PD Day, School Closed						
Student Days		19				
Teacher Days		20				

Mar-25						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					
7- End of Qtr 3 10- 14- Spring Break, School Closed 17- Teacher PD Day						
Student Days		15				
Teacher Days		16				

Apr-25						
S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			
17- Holy Thursday, 18- Good Friday early dismissal opt. 21- Easter Monday; No School						
Student Days		21				
Teacher Days		21				






May-25						
S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31
22- Last day of school, early dismissal opt. 23- Teacher Inservice day 26-Memorial Day						
Student Days		16				
Teacher Days		17				

Jun-25						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						
Student Days		0				
Teacher Days		0				






Total Student Days 175

Total Teacher Days 185

DIOCESAN ASSIGNED DATES

-  Holiday/School closed
-  Teacher In-Service/School Closed (5)
-  Diocesan Meetings--New Principal Orientation, New Teacher Orientation, Benefits, etc.
-  Fall, Thanksgiving & Spring Breaks
-  First and Last Days

SCHOOL ASSIGNED DATES

-  School in session (175 minimum)
-  Parent-Teacher Conference Day (School Closed only)
-  Teacher Work Days--pre- or post-service work days (4-6)
-  School Event that potentially affects other schools (Dances, fundraising, long-standing traditions, graduations, etc.)
-  Early Dismissal/Late Arrival

Designated Flex Hours

The 10 days exceeding the 165 mandatory days will be reserved for approved weather/campus emergency, specified early release days, and faculty meeting/professional development only. With the exception of weather/campus emergencies where virtual options are not feasible or length of virtual classes exceeds students' capabilities, students must attend/work asynchronously on school work five (5) hours of the day flex hours are utilized. Once 65 hours is reached, any missed instructional time will need to be made up at the end of the year or by reclaiming holidays, breaks, etc. See Calendar direction sheet for approved uses.

Designated Flex Use Reservation		# of Hours
1	Additional Professional Development 90 minutes per week for 26 weeks	39
2		0
3		0
4		0
5		0
6		0
7		0
8		0
Total		39

Approved use of Flex Hours	
HS/ EL	Weather Days: <i>If school cannot successfully pivot to virtual due to lack of electricity or device availability for students, then this option cannot be used and weather/emergency days need to be reserved. (Suggested: 1 or 2 snow days then pivot to virtual.)</i>
HS/ EL	Early Dismissal (1:00 p.m.) for 1 st Day, last day before Christmas Break, Good Friday and Last day of school. (8 hours Max)
HS/ EL	Campus facility emergency calling for early dismissal or late arrival
HS/ EL	Campus facility emergency that requires closure
EL Only	Early dismissal for faculty meeting, PLCs/instructional coaching sessions, or additional professional development- 1 hour per week x 25 weeks = 25 hours; 1 hour bi-weekly =15 hours
HS/ EL	Early dismissal (1:00 p.m.) for a parent/student engagement event that is to happen immediately after dismissal and where students are present with parents (eg. Fall Festival, STEM Expo) This may NOT be used for sports, sports practices, or fundraising events etc.
HS Only	Weekly one period (50 min) Late Arrival or Early Dismissal for faculty meetings, PLCs/ instructional coaching sessions, and additional professional development- 34 weeks = 28 hours max allowed

Calendar Recap

School Name St. Isidore of Seville Catholic Virtual School

Student Days: 175

Teacher Professional Development Days: 5

Total Days in Calendar; 180

of Flex Hours Requested: 39

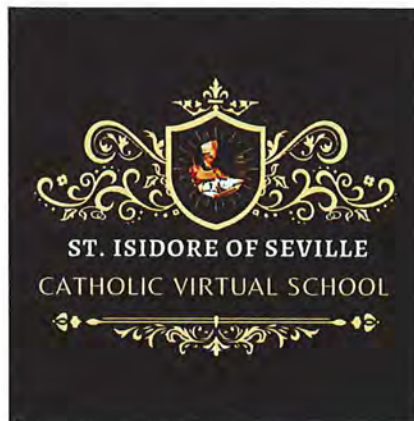
Faculty Retreat Date: 8/8/2024

Parent Teacher Conference Date: 10/10/2024

Are conferences student led? Yes

Principal's Signature: TBD Date:

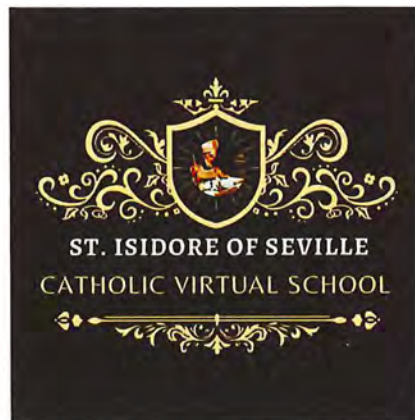
Diocesan Approval: Lara B. Schuler Date: 12/31/2022



Section 13: Appendix F

Governing Board Documents

- 1.) Approved Bylaws
- 2.) Statements of Assurances
- 3.) Conflict of Interest Forms
- 4.) Board Meeting Minutes



Section 13: Appendix F. Section 1- Approved Bylaws

BYLAWS
OF
SAINT ISIDORE OF SEVILLE VIRTUAL CHARTER SCHOOL, INC.

January 27, 2023

Teaching unsupported by grace may enter our ears, but it never reaches the heart. When God's grace does touch our innermost minds to bring understanding, then his word, which is received by the ear, can sink deep into the heart.

-- St. Isidore of Seville

Come, Holy Spirit, Divine Creator, true source of light and fountain of wisdom! Pour forth your brilliance upon my dense intellect, dissipate the darkness which covers me, that of sin and of ignorance. Grant me a penetrating mind to understand, a retentive memory, method and ease in learning, the lucidity to comprehend, and abundant grace in expressing myself. Guide the beginning of my work, direct its progress, and bring it to successful completion. This I ask through Jesus Christ, true God and true man, living and reigning with You and the Father, forever and ever.

Amen.

--St. Thomas Aquinas

ARTICLE I

Name and Purpose

Section 1.1 Name. The name of this corporation is Saint Isidore of Seville Virtual Charter School, Inc., an Oklahoma not-for-profit corporation (the "School").

Section 1.2 Purposes. The School is organized and will be operated exclusively for educational, charitable, and religious purposes. The School is an Oklahoma virtual charter school established pursuant to the Oklahoma Charter School Act, 70 O.S. § 3-130 et. seq. Subject to the foregoing and other limitations set forth in the Certificate of Incorporation, the School shall have and exercise all the powers of nonprofit corporations under Oklahoma law.

Without limiting the generality of the foregoing, the School's purposes, activities, programs, and affairs shall include the following:

- A. To create, establish, and operate the School as a Catholic School. "It is from its Catholic identity that the school derives its original characteristics and its 'structure' as a genuine instrument of the Church, a place of real and specific pastoral ministry. The Catholic school participates in the evangelizing mission of the Church and is the privileged environment in which Christian education is carried out. In this way 'Catholic schools are at once places of evangelization, of complete formation, of inculturation, of apprenticeship in a lively

dialogue between young people of different religions and social backgrounds.” Congregation for Catholic Education, The Catholic School on the Threshold of the Third Millennium ¶11 (1997).

- B. To operate a “school [that] sets out to be a school for the human person and of human persons. ‘The person of each individual human being, in his or her material and spiritual needs, is at the heart of Christ’s teaching: this is why the promotion of the human person is the goal of the Catholic school.’” Congregation for Catholic Education, The Catholic School on the Threshold of the Third Millennium ¶9 (1997). The heart of this mission “is oriented toward an integral formation of each student.” Sacred Congregation for Catholic Education, Lay Catholics in Schools: Witnesses to Faith ¶28 (1982).
- C. To operate a school that understands “[t]he truth is that only in the mystery of the incarnate Word does the mystery of man take on light. ... [Christ] fully reveals man to man himself and makes his supreme calling clear.” Vatican II, Gaudium et Spes ¶22 (1965). The truth of the human person and the person’s ultimate destiny is learned and understood through faith and reason, theology and philosophy, including the study of the natural sciences. There is a “profound unity which allows [faith and reason] to stand in harmony ... without compromising their mutual autonomy.” St. John Paul II, Fides et Ratio ¶48 (1998).
- D. To operate a school that educates its students for freedom, understanding that “in order to be authentic, freedom must measure itself according to the truth of the person, the fullness of which is revealed in Christ, and lead to a liberation from all that denies his dignity preventing him from achieving his own good and that of others.” Congregation for Catholic Education, Consecrated Persons and Their Mission in Schools: Reflections and Guidelines, ¶37 (2022).
- E. To assist and accompany parents in their obligation to educate their children. Code of Canon Law, Canons 793-806; Vatican II, Declaration on Christian Education ¶3 (1965). This obligation includes forming and cultivating students to
 - a. See and understand truth, beauty and goodness, and their author and source – God. Catechism of the Catholic Church ¶2500;
 - b. Know that among all creatures, the human person is the only one created in God’s image with the ability to know and love God, and that God created persons male and female. Catechism of the Catholic Church ¶355-379;
 - c. Know that because of sin humanity was separated from God, but in God’s love He has provided a path to salvation through the saving power of Christ, the second person of the Trinity, in His suffering, death and resurrection. E.g., Catechism of the Catholic Church ¶651-655;
 - d. Know that in this earthly sojourn, each person is called to participate in Christ’s suffering and death by daily taking up their own cross and following Him. Catechism of the Catholic Church ¶618;

- e. Know that human persons are destined for eternal life with the Holy Trinity, *e.g.*, Catechism of the Catholic Church ¶1720-1724, but that in freedom, an individual may reject God's invitation and by this "definitive self-exclusion" end up in hell, Catechism of the Catholic Church ¶1033;
 - f. Engage in the lifelong task of forming one's conscience to know good from evil and developing the will to do good and avoid evil, Catechism of the Catholic Church ¶1749-1794;
 - g. Develop habits of the intellect and will allowing one to live a virtuous life, Catechism of the Catholic Church ¶1784, 1803-1829; and
 - h. Develop mind and body according to each student's ability so that the student may go into the world, participating in the transformation and development of society by the efforts of his or her labor, Catechism of the Catholic Church ¶1877-1889.
- F. To provide rigorous high-quality educational opportunities to prepare students for professional life. Vatican II, Declaration on Christian Education ¶5 (1965).
 - G. To operate a school in harmony with faith and morals, including sexual morality, as taught and understood by the Magisterium of the Catholic Church based upon Holy Scripture and Sacred Tradition.
 - H. To hire educators, administrators, and coaches as ministers committed to living and teaching Christ's truth, as understood by the Magisterium of the Roman Catholic Church, through actions and words, using their commitment to Christ and his teachings in character formation, discipline, and instruction, and to live this faith as a model for students.
 - I. To contribute to the common good of society by 1) putting the Church at the service of the community in the realm of education, 2) providing an example of an education directed toward the whole person – body, mind, soul and spirit -while rejecting the idea of a partial education directed solely toward mind and body; 3) sharing with parents, the state, and other educational institutions the universally recognized obligation to educate the young; 4) its openness to accept students of all faiths or no faith who appreciate and desire a robust Catholic education; and 5) guaranteeing cultural and educational pluralism, providing families to educate their children according to the dictates of their consciences. Congregation for Catholic Education, The Catholic School on the Threshold of the Third Millennium ¶16 (1997).
 - J. To establish policies, plans, and procedures for the implementation and administration of the designated purposes;
 - K. To enter into agreements with outside entities, including the Archdiocese of Oklahoma City and the Diocese of Tulsa, in connection with the foregoing purposes; and

- L. To fulfill such other purposes and functions, consistent with the Oklahoma Charter Schools Act, Oklahoma law, federal law, and Canon Law as the Board shall determine from time to time.

Section 1.3 Oklahoma Charter Schools Act. During the term that the School operates a charter school and maintains a contract as a charter school under the Oklahoma Charter Schools Act, the School will be subject to the requirements of such Act, including requirements relating to programs, admission policies, enrollment, testing, employment practices, and accountability, that are consistent with the School's constitutional rights as a religious school under the auspices of the Catholic Church. Additionally, during such time the School shall be entitled to the rights, benefits, privileges, prerogatives, and protections afforded to charter schools under such Act.

Section 1.4 Restrictions. At no time, either on dissolution or prior to dissolution, shall any part of the funds or assets of the School inure to the benefit of any private individual, nor be used for the purpose of carrying on propaganda or otherwise attempting to influence legislation, except as may be permitted by law and the Internal Revenue Code of 1986, as amended, (the "Code") or corresponding provisions of any subsequent federal tax laws (all references in these Bylaws to the Code shall include reference to any corresponding provisions of any subsequent federal tax laws). The School shall not participate in or intervene in any political campaign on behalf of any candidate for public office.

Section 1.5 Certain Restrictions. If the School is found to be a private foundation, as that term is defined in Section 509 of the Code, then (a) the School shall conduct its business and distribute its income as necessary for each taxable year at such time and in such manner as not to become subject to the tax on undistributed income imposed by Section 4942 of the Code, and (b) the School shall not engage in any act of self-dealing as defined in Section 4941(d) of the Code, shall not retain any excess business holdings as defined in Section 4943(c) of the Code, shall not make any investments in such a manner as to subject the Corporation to tax under Section 4944 of the Code, and shall not make any taxable expenditures as defined in Section 4945(d) of the Code.

Section 1.6 Charitable Activities. The School shall carry on only those activities permitted to be carried on by an organization described in Section 501(c)(3) of the Code.

ARTICLE II

Offices

Section 2.1 Offices. The principal office of the School will be located 7501 Northwest Expressway Oklahoma City, OK 73132. The School may also have offices at other such places as the School's Board may determine.

Section 2.2 Registered Office. The School shall have and continuously manage a registered office in Oklahoma and a registered agent whose office shall be identical with the registered office.

Section 2.3 Governing Law. The business of the School shall be conducted under and be compliant with applicable Canon, Federal, and Oklahoma law.

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ARTICLE III

Membership

Section 3.1 Members. The School shall have two Members (collectively, the "Members"). These Members are the Archbishop of the Archdiocese of Oklahoma City and the Bishop of the Diocese of Tulsa and their successors in office. Membership in the Corporation is not transferable or assignable, except by succession to the office, or, if *sede vacante*, the duly elected Administrator, under Canon Law, may serve as a Member until a new Archbishop or Bishop is elected.

Section 3.2 Rights of Members. The Members of the School shall be qualified to vote or to furnish any necessary consent, approval, or ratification or take other action on any matter that may be presented by the Members. The following actions require approval by the Members upon resolution passed by a majority vote of the directors present and voting at a meeting of the Directors at which a quorum is present:

- A. amendment or restatement of the Certificate of Incorporation or the Bylaws of the School;
- B. merger, consolidation, combination, or conversion of the School with or into any other entity, enterprise, agency, or body; sale of all or substantially all of the assets of the School; acquisition of the School by any other entity or enterprise; or converting the School into any other form of entity;
- C. appointment of Directors;
- D. appointment of President;
- E. dissolution, liquidation, or termination of the business of the School;
- F. any change in the purposes of the School; and
- G. any decision to file a voluntary petition under any law involving the adjudication of the School as bankrupt or insolvent or taking any action with respect to the reorganization of the School.

ARTICLE IV

Board of Directors

Section 4.1 General Powers. The Board of Directors shall manage and direct the business and affairs of the School. The Board of Directors shall have all powers and authority provided in the Certificate of Incorporation and permitted by Oklahoma law, federal law, and Canon Law. The business and affairs of the School may be managed in a manner different from those specified in Section 1027 of the Oklahoma General Corporation Act. Such differences may include additional classes of Directors, longer terms of service of Directors, the use of less than unanimous consent

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for board action, and permitting the Members to designate committees and appoint committee chairs and members. The Board may delegate limited authority to an Educational Service Provider ("EMO") as it may deem necessary and as specified in the contractual agreement with the EMO, including the power to operate the routine affairs and activities of the School; provided, however, that the Board shall retain the ultimate oversight and responsibility of the affairs of the School.

Section 4.2 Specific Powers. The following actions require action be taken by the Board of Directors:

- A. sale, conveyance, assignment, or other transfer of any other property with a fair market value in excess of \$50,000;
- B. causing the School to borrow money, incur or increase any indebtedness (other than payables created in the ordinary course of the School's business and in amounts not in excess of those provided for in the applicable annual budget), refinance any indebtedness, repay any indebtedness or secure any of the foregoing by mortgage, pledge or other lien on any property of the School, except to the extent expressly set forth in the annual budget;
- C. execution of any agreement, or of any modification, amendment or restatement of or supplement to any agreement, or the exercise of any consent, approval or termination rights under any agreement, or the termination of any agreement, if the agreement is one which binds the School for a period exceeding one year or which involves aggregate expenditures exceeding \$100,000;
- D. making any capital improvements, alterations, or changes in or to any property of the School in excess of \$100,000, except for such matters as may be provided for in the applicable annual budget;
- E. making any expenditures or incurring any obligations by the School, the combined cost of which in any one fiscal year exceeds \$100,000, except for expenditures made and obligations incurred pursuant to and specifically provided in the annual budget for such year;
- F. making any expenditure or incurring any obligation which, when added to any other expenditure for the fiscal year of the School, exceeds the amount allocated to the applicable budget category in the applicable annual budget by more than 25% or \$50,000, whichever is less;
- G. institution, prosecution, settlement, compromise and dismissal of lawsuits or other judicial or administrative proceedings brought on behalf of, or against, or involving the School;
- H. acquisition by purchase, lease, or otherwise of any real property;
- I. sale, conveyance, assignment, or other transfer of any real property; and
- J. any agreement, contract, understanding, or arrangement providing for any of the foregoing.

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Section 4.3 Number. The number of Directors shall be not less than five (5) nor more than fifteen (15), and within that range, shall be determined by the Members. The composition and qualifications of the Directors will be as follows:

- A. The minimum number of Directors shall include the Chancellors of the Archdiocese of Oklahoma City and the Diocese of Tulsa and the Directors of Catholic Education/Superintendents of both dioceses, all of whom shall serve as ex-officio, voting Directors.
- B. At no time shall there be more than two (2) non-Catholics serving as directors.
- C. Catholic members of the Board must have the support expressed in writing of their pastor. All directors who are members of the Catholic Church must sign the Statement Attached as Exhibit A to these bylaws,¹ and all directors must sign the Commitment attached as Exhibit B to these bylaws.²
- D. In addition to total number of directors, the Board of Directors shall appoint, by majority vote, one or more parent representatives to serve as Directors. A parent representative (a) must be a parent, grandparent, or guardian of a student currently or previously enrolled in the school, (b) may be self-nominated in April of each school year, and (c) will be appointed for a term of one year and will not be eligible for re-appointment.
- E. No reduction in the number of Directors shall have the effect of removing any Director from office before the expiration of his or her term.

Section 4.4 Election; Terms. The Members of the School shall elect the individuals to serve as Directors of the School at the annual meeting of the Board of Directors. Other than Directors described in Sections 4.3A and 4.3D, the Directors shall be elected or designated to serve for terms of three (3) years and until their successors are elected and have qualified.

Directors, other than Directors described in Sections 4.3A and 4.3D, shall be divided into three classes, as nearly as equal in number as possible, with the terms of approximately one-third of the Directors expiring each year. When the number of Directors is changed, any newly created positions or any decrease in the number of Directors shall be so apportioned among the classes as to make all classes as nearly equal in number as possible. The initial Directors will be designated in identifiable seats, which will be for one-, two-, and three-year initial terms of service. The Board should divide the initial Directors equitably between these three different initial terms of service.

Subject to the foregoing, the successors to the class of Directors whose term are expiring shall be elected to hold office for a term expiring at the third succeeding annual meeting and until his or her successor has been duly elected and has qualified. A Director may be elected to succeed

¹ See Exhibit A.

² See Exhibit B.

himself or herself upon the expiration of his or her term if the Members determines that the interests of the School would be best served by that retention.

Section 4.5 Vacancies. If a vacancy results from the resignation, removal, or other inability or incapacity of a Director, or as a result of an increase in the number of Directors, then the Members may fill the vacancy with a person recommended by a majority of the Board present and voting at a meeting. A Director so chosen shall be elected to serve for the remainder of the term of the director whose position had become vacant, or, when applicable, to serve for the term of a newly created position that increases the number of Directors.

Section 4.6 Resignation. Any Director may resign from the Board of Directors by giving thirty (30) days prior written notice to the Chair. Unless otherwise specified in the notice, the acceptance of the resignation shall not be necessary to make it effective.

ARTICLE V

Meeting of the Board of Directors

Section 5.1 Oklahoma Open Meeting Act. The School shall comply with the requirements of the Oklahoma Open Meeting Act. In the event of an inconsistency between the provisions of these Bylaws relating to meetings and meeting requirements and the provisions of the Oklahoma Open Meeting Act, the provisions of the Oklahoma Open Meeting Act shall control.

Section 5.2 Meetings. Annually, the Board shall hold a meeting in June at a time to be designated by the Board Chair for the purpose of electing officers and transacting any other business that may properly come before the meeting. The Board will hold additional at least three additional regular meetings each year, and may hold special, and emergency meetings at such place and time as the Board may determine.

Section 5.3 Notice of Meetings. Notice of the annual meeting and of any regular or special meetings of the Board of Directors shall be given at least seven days before the meeting, specifying the date, time, place, and purposes of the meeting. All notices of meetings, including notices of continued or reconvened meetings, notices of emergency meetings, posting of agendas, manner of giving notice, and other matters relating to meetings, will be subject to the provisions of the Oklahoma Open Meeting Act.

Section 5.4 Place of Meetings. Board meetings may be held at such places as the Board may determine or as may be specified in the notice of the meeting.

Section 5.5 Notice to Directors. Unless otherwise provided by these Bylaws, notice may be given in writing and delivered personally, sent by United States mail, or sent by electronic transmission, addressed to the individual to whom notice is being given at such address as appears on the records of the School.

Section 5.6 Waiver of Notice. An individual who is entitled to receive notice of any meeting may waive notice by signing a written waiver or by sending a waiver by electronic transmission, either before or after the meeting, and the waiver will be deemed equivalent to notice.

Section 5.7 Quorum and Voting. A majority of the directors, present in person, shall constitute a quorum for the transaction of business at any meeting of the Board. Each director shall be entitled to one vote on matters presented to the directors. Directors may not vote by proxy. Except as otherwise specified in these Bylaws, the act of a majority of voting directors present in person at a meeting at which a quorum is present shall be the act of the Board of Directors.

Section 5.8 Public Notices. The School shall publish a public notice by December 15 of each calendar year setting forth the date, time, and place of the regularly scheduled meetings of the Board of Directors for the following calendar year. In addition to such notice, the School shall display, at least 24 hours before such meetings, public notice of the meeting, setting forth the date, time, place, and proposed agenda for the meeting, as provided in and subject to the provisions of the Oklahoma Open Meeting Act.

Section 5.9 Videoconference. Members of the Board of Directors may participate in a meeting of the Board or committee by means of videoconference that allows both visual and auditory communication for all directors participating in the meeting. Such participation shall be considered to be presence in person at the meeting.

Section 5.10 Executive Sessions. The Board may convene in executive session in the manner specified in the Oklahoma Open Meeting Act. Agendas for executive sessions must contain sufficient information for the public to ascertain that an executive session will be proposed, must identify the items of business and purposes of the executive session, and must state specifically the provisions of the Oklahoma Open Meeting Act under which the executive session is authorized.

Section 5.11 Oklahoma Open Records Act. The School shall comply with the requirements of the Oklahoma Open Records Act. Although the records of the School will generally be open for public inspection, the School will protect the confidentiality of individual student records, teacher lesson plans, tests, teaching material, and personal communications concerning individual students to the extent permitted or required under such Act or otherwise by law.

ARTICLE VI

Officers and Employees

Section 6.1 Election. At each annual meeting, the Board of Directors shall elect such officers (individually, "Officer," and collectively, "Officers") of the School as may be necessary to enable the School to sign instruments that comply with the Oklahoma General Corporation Act. Officers may include a Chair, one or more Vice Chairs (who may be designated by different classes), a Secretary, a Treasurer, and other Officers with other titles, including Assistant Secretaries and Assistant Treasurers. An individual may serve in more than one office, except that an individual may not simultaneously serve as both Chair and Secretary or Treasurer.

Section 6.2 Terms, Removal, and Vacancies. All Officers shall hold office for terms of two years and until their successors are duly elected and qualified (except as provided in any employment contract between the School and the Officer). They may be re-elected for additional terms. The Board of Directors may remove any Officer at any time whenever, in its judgment, removal would serve the best interests of the School (except as provided in any employment contract between the School and the Officer). Any Officer may resign at any time by giving written notice to the Chair, or, if the Chair, to the Members subject to any employment contract. Unless otherwise specified in the notice, the acceptance of the resignation shall not be necessary to make it effective. The Board of Directors may fill any vacancy in any office other than President. The Members may fill the office of President on recommendation of the Board of Directors.

Section 6.3 Compensation. The School shall not pay any compensation to its Officers for their services as Officers unless the Officers are also employed by the School. The Board of Directors shall determine the compensation of the Executive Director, and the Executive Director shall determine the compensation of any other Officers employed by the School.

Section 6.4 Chair. The Chair shall be a Director and shall perform such duties as the Board of Directors may assign. Additionally, the Chair shall be responsible for setting agendas for meetings of the Board of Directors and Executive Committee, preside at and conduct meetings, and manage and oversee the regular affairs of the Board of Directors and Executive Committee. The Chair shall regularly report to the Members and the Board of Directors on the business and affairs of the School and the performance of School functions. In the absence or inability to act of the Executive Director, the Chair may perform the duties and discharge the responsibilities of the Executive Director or delegate such duties and responsibilities to another Director, Officer, or employee of the School.

Section 6.5 Vice Chair. The Vice Chair shall be a Director and shall perform such duties as the Board of Directors or the Members may assign. In the absence or inability to act of the Chair, the Vice Chair shall perform the duties and discharge the responsibilities of the Chair.

Section 6.6 Chief Administrative Officer. The Chief Administrative Officer shall be a non-voting Director and shall perform such duties as may be assigned by the Board of Directors. The Chief Administrative Officer shall:

- A. supervise the business of the School and direct the affairs and policies of the School, subject to any directions that may be given by the Board of Directors;
- B. assure that the School conforms with the requirements of authorized regulatory authorities and the Catholic Church;
- C. carry out all policies and procedures established by the Board of Directors; and
- D. in general, have all other powers and perform all other duties incident to the position of president and chief executive officer of a corporation and have such authority and responsibilities as may be prescribed by the Members and the Board of Directors.

The responsibilities of the Chief Administrative Officer shall include acting as a representative of the School to the public, the business community, governmental authorities, the Archdiocese of Oklahoma City, the Diocese of Tulsa, the Roman Catholic Church, The Virtual Charter Board, the Saint Isidore of Seville Virtual Charter School, Inc.

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Oklahoma State Department of Education, religious organizations, educational organizations, nonprofit organizations, and others, and reporting to the Board of Directors on the performance of School functions.

The Chief Administrative Officer shall have authority to execute deeds, mortgages, leases, contracts, and other instruments of the Corporation, except where the execution is delegated by the Board of Directors to another officer or agent of the School or reserved to the Board. Additionally, the Chief Administrative Officer shall perform such duties and responsibilities and carry out such functions as may be provided or prescribed in any employment agreement with the School. The Chief Administrative Officer will report to, and the Chief Administrative Officer's performance will be evaluated by, the Governance Committee of the Board.

Section 6.7 Secretary. The Secretary shall keep or cause to be kept at the School's principal's office a book of minutes of all meetings of the Board and Board committees, keep or cause to be kept a copy of the School's Bylaws with any amendments, give or cause to be given notice of the Board and committee meetings, and have such other powers and perform other such duties as the Members or the Board of Directors may prescribe.

Section 6.8 Treasurer. The Treasurer, or designee, may chair the finance committee, and be responsible for reviewing budgets, helping with the development of fundraising plans, and reporting to the Board on the financial affairs of the School. The Treasurer shall also perform such duties as the Board of Directors may assign. The Treasurer, or designee, may make a report at each Board meeting.

Section 6.9 Other Officers. If the Board of Directors elects or appoints other Officers, those Officers shall perform such duties as the Board of Directors may assign.

Section 6.10 Final Authority for Matters of Belief and Conduct. For purposes of implementing the School's Catholic mission, ministry, doctrine, practice, policy, and discipline, the Members are the Corporation's final interpretive authority with respect to matters of faith and morals as it pertains to its ministry, organization, and to the conduct of the Executive Director.

ARTICLE VII

Committees

Section 7.1 Committees, Councils, and Task Forces. The Board may create and abolish committees consisting of at least two directors, appoint directors to and remove directors from those committees, designate one or more directors as alternate members to replace any absent or disqualified director at any meeting of the committee, and adopt committee charters for those committees setting forth the committee titles, designations, compositions, functions and duties, to assist in carrying out the business and affairs of the Corporation. The Chair shall appoint a chair of all committees, other than the Executive Committee. The Chair may appoint individuals who are not Directors to serve as members of committees. By accepting membership on any committee, each committee member agrees to adhere to the teachings of the Catholic Church and to advise, consistent with such teachings, the committees, the Board, and the Corporation. Additionally, the Saint Isidore of Seville Virtual Charter School, Inc.

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Board, may create and abolish Advisory Councils and Task Forces and may appoint members of Advisory Councils and Task Forces. Individuals who are not Directors may serve as members of Advisory Councils and Task Forces, as well as ex-officio, nonvoting members of Committees. All committees will be subordinate, advisory, recommending bodies that may not exercise the decision-making authority of the Board.

Section 7.2 Executive Committee. The Executive Committee shall consist of the Officers of the School who are Directors plus two additional Directors appointed by a majority vote of all of the Directors. The Executive Committee may meet at stated times or on notice to all of its members.

Section 7.3 Governance Committee. The Board shall form a Governance Committee that will consist of less than a quorum of Board Members and may include other stakeholders selected by the Board to serve on the Governance Committee. The purpose of this Committee shall be to recruit, identify, and nominate prospective Board Members to serve on the Board. The Governance Committee shall publish a board member application and questionnaire, which shall be available to the members of the public interested in serving on the Board. The Governance Committee shall also be responsible for ensuring that there is no conflict of interest involving any prospective Board Members. The Governance Committee shall ensure an independent process is implemented for the identification, recruitment, selection, vetting, and nomination of Board Members. The Governance Committee will also be responsible for annually evaluating the performance of the Chief Administrative Office and reporting its evaluation to the full Board in Executive Session. The Directors of Education/Superintendents for the Archdiocese of Oklahoma City and the Diocese of Tulsa shall both serve on the Governance Committee.

Section 7.4 Finance Committee. The Finance Committee shall consist of the Treasurer, as Chair, and at least two other Board members. The Finance Committee shall make recommendations to the Board of Directors regarding the School's financial planning, prepare the School's annual budget, develop relevant financial plans for the School's operations, including fundraising and procurement initiatives, and develop all such relevant plans regarding the School's financial needs and status.

Section 7.5 Audit Committee. The Audit Committee may include persons who are not members of the Board, but the member or members of the Audit Committee shall not include any members of the staff of the corporation, including the Chief Administrative Officer and the Treasurer. Members of the Finance Committee shall constitute less than one-half of the Audit Committee, and the chair of the Audit Committee may not be a member of the Finance Committee. Members of the Audit Committee shall not receive any compensation from the corporation and shall not have a material financial interest in any entity doing business with the corporation. Subject to the supervision of the Board, the Audit Committee shall be responsible for recommending to the Board the retention and termination of the independent auditor and may negotiate the independent auditor's compensation, on behalf of the Board. The Audit Committee shall confer with the auditor to satisfy its members that the financial affairs of the corporation are in order, shall review and determine whether to accept the audit, shall assure that any non-audit services performed by the auditing firm conform with applicable standards for auditor independence, and shall approve performance of non-audit services by the auditing firm.

Section 7.6 Term. Each member of a Committee shall continue as a member of that Committee until the next annual meeting and until a successor is appointed, unless the Committee is being discontinued earlier, the Committee member resigns or is removed by the Board. Members of Advisory Councils and Task Forces may continue to serve as determined by the Board.

Section 7.7 Meetings. The Chair of each Committee, Advisory Council, and Task Force shall determine the date, time, and place of meetings and shall arrange for written notice of the date, time, and place of each meeting to be given to each member of the Committee, Advisory Council, or Task Force at least three days prior to the meeting. Business to be transacted at any regular meeting of the Committees, Advisory Councils, or Task Forces shall not be limited to the matters set forth in the notice of meeting. The attendance of any member at any meeting shall constitute a waiver of notice of the meeting.

Section 7.8 Quorum and Voting. At least one-half of the voting members of any Committee, Advisory Council, or Task Force present in person constitutes a quorum for the transaction of business at any meeting of such Committee, Council, or Task Force. Each voting member of any Committee, Advisory Council, or Task Force is entitled to one vote on matters presented to the Committee, Advisory Council, or Task Force. Members may not vote by proxy. Except as otherwise specified in these Bylaws, the act of a majority of voting members of any Committee, Advisory Council, or Task Force present in person at a meeting at which a quorum is present shall be the act of the committee, advisory council, or task force.

Section 7.9 Vacancies. The Board Chair may appoint individuals to fill Committee, Advisory Council, or Task Forces vacancies, other than vacancies on the Executive Committee, resulting from the resignation, removal, or other inability or incapacity of a committee member.

Section 7.10 Action Without Meeting. Any action required or permitted to be taken at any meeting of any Board Committee may be taken without a meeting if two-thirds (2/3rds) of the voting members of the Committee consent to the action in writing, and the written consent is filed with the minutes of the proceedings of the Committee. Written consent may be obtained and provided by electronic communication or other means.

ARTICLE VIII

Finance

Section 8.1 Fiscal Year. The fiscal year will run from July 1 to June 30.

Section 8.3 Issuance of Warrants and Reporting. As required by 70 O.S. §18-116, the School shall not spend any public funds except by regularly issued warrants. The warrants shall be issued against properly approved encumbrances in the manner provided by law. All encumbrances shall be approved by the Board at a regular meeting or a special meeting. All original copies of encumbrances as represented by purchases orders shall be filed in either numerical or alphabetical order with the original paid invoice or invoice attached. This shall be accompanied by a signed and dated receiving copy verifying receipt of goods or services. The Board shall ensure there is a system for initiating, recording, and paying contractual obligations as set forth in 70 O.S. § 5-135.

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The Board shall also ensure the proper reporting of financial transactions and costs as required by 70 O.S. §5-135.2.

Section 8.4 Funds Deposit. All funds of the School shall be deposited to the credit of the School under such conditions and in such banks or depositories as shall be designated by the Board.

Section 8.5 Donations. The Board may accept on behalf of the School any contribution, gift, bequest, or devise for the general purposes or for any special purpose of the School. The School shall separately inventory assets purchased with private or donated funds.

Section 8.6 Financial Reporting. A summary report of the financial operations of the School shall be prepared by the Treasurer and the financials will be provided to the School's authorizer as required. The Treasurer, or designee, shall present or cause to be presented the same to the Board at each regularly scheduled Board meeting. The Treasurer shall report directly to the Board.

Section 8.7 Books and Records. The School shall keep correct and complete books and records of accounts and minutes of meetings by the Board. Said records shall be maintained and available for inspection as may be required by law.

Section 8.8 Exemption. This nonprofit organization shall apply for and maintain itself as a tax-exempt organization under the provisions of Section 501(c)(3) of the Internal Revenue code and its Regulations as they now exist.

Section 8.10 Budget. The Board shall be responsible for ensuring that an accurate budget is approved for each fiscal year and shall monitor financial compliance with the budget at Board meetings during the fiscal year. To the extent expenditures exceed the budget, the Board shall take action to ensure the financial solvency of the School.

Section 8.11 Educational Management Organization. To the extent the Board contracts with an Education Management Organization ("EMO"), the Board shall ensure compliance by the EMO and School with the provisions in 70 O.S. §5-200. The Board shall vote in an open meeting to approve any payment of public funds to an EMO, or any of its affiliated entities.

ARTICLE IX

Indemnification

Section 9.1 Actions Other than in the Right of the School. The School shall indemnify any person who was or is a party or is threatened to be made a party to any threatened, pending, or completed action, suit, or proceeding whether civil, criminal, administrative, or investigative (other than an action by or in the right of the School) by reason of the fact that the person is or was a director, officer, employee, or agent of the School or is or was serving at the request of the School as a director, officer, partner, manager, member, trustee, employee, or agent of another corporation, partnership, joint venture, limited liability company, trust, or other enterprise against expenses (including attorneys' fees), judgments, fines, and amounts paid in settlement actually and reasonably incurred by the person in connection with such action, suit, or proceeding if the person Saint Isidore of Seville Virtual Charter School, Inc.

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Section 9.6 Entitlement. Every such person shall be entitled, without demand upon the School or any action by the School, to enforce his or her right to such indemnity in an action at law against the School. The right of indemnification and advancement of expenses provided in this Article shall not be deemed exclusive of any rights to which any such person may now or later be otherwise entitled. Without limiting the generality of the foregoing, the right to indemnity shall not be deemed exclusive of any rights pursuant to statute or otherwise, of any such person in any action, suit, or proceeding to have assessed or allowed in his or her favor against the School or otherwise, costs and expenses incurred or connection with the matter.

ARTICLE X

General Provisions

Section 10.1 Notices. Unless otherwise provided by these Bylaws, notice may be given in writing, may be delivered personally or sent by United States mail postage paid, by email, or by other electronic means, and may be addressed to the individual to whom notice is being given at such address as appears on the records of the School.

Section 10.2 Waiver of Notice. A person entitled to receive notice under these Bylaws may waive the notice requirement by executing a written waiver, or in the case of notice of a meeting, by attending, and failing to object at or immediately prior to the beginning of, the meeting in question.

Section 10.3 Non-Discrimination. The School shall not exclude from participation, deny benefits or services, or discriminate against any individual on the basis of race, color, national origin, age, sex, or physical disability or impairment under any program or activity it sponsors or conducts to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of non-discrimination.

Section 10.4 No Implied Rights. Except as provided in Article IX of these Bylaws, nothing contained in these Bylaws is intended to confer any rights or benefits upon any individual or to confer any private right, remedy, or right of action upon any person. These Bylaws are intended for internal corporate use only and solely for the governance of the internal affairs of the School.

Section 10.5 Immunities. To the fullest extent permitted by law, no Director shall be liable for monetary damages to the School or its Members or any other person for breach of fiduciary duty as a Director.

ARTICLE XI

Dissolution

Section 11.1 Dissolution. The School may be dissolved by the Members or by a majority vote of the directors present and voting at a meeting of the directors at which a quorum is present, subject to the approval of the Members. Upon dissolution, the directors shall, after paying or making

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acted in good faith and in a manner the person reasonably believed to be in or not opposed to the best interests of the School, and, with respect to any criminal action or proceeding, had no reasonable cause to believe the conduct was unlawful. The termination of any action, suit, or proceeding by judgment, order, settlement, conviction, or upon a plea of nolo contendere or its equivalent shall not, of itself, create a presumption that the person did not act in good faith and in a manner which the person reasonably believed to be in or not opposed to the best interests of the School and with respect to any criminal action or proceeding had no reasonable cause to believe that the conduct was unlawful.

Section 9.2 Actions by or in the Right of the School. The School shall indemnify any person who was or is a party or is threatened to be made a party to any threatened, pending, or completed action or suit by or in the right of the School to procure a judgment in its favor by reason of the fact that the person is or was a director, officer, employee, or agent of the Corporation or is or was serving at the request of the School as a director, officer, partner, manager, member, trustee, employee, or agent of another corporation, partnership, joint venture, limited liability company, trust, or other enterprise against expenses (including attorneys' fees) actually and reasonably incurred by the person in connection with the defense or settlement of such action or suit if the person acted in good faith and in a manner the person reasonably believed to be in or not opposed to the best interest of the School; except that no indemnification shall be made in respect of any claim, issue, or matter as to which such person shall have been adjudged to be liable to the School unless and only to the extent that the court in which such action or suit was brought shall determine, upon application, that despite the adjudication of liability, but in the view of all the circumstances of the case, such person is fairly and reasonably entitled to indemnity for such expenses which the court shall deem proper.

Section 9.3 Advancement of Expenses. The School may advance expenses incurred in defending a civil or criminal action, suit, or proceeding, in advance of the final disposition of the action, suit, or proceeding upon receipt of an undertaking by or on behalf of the director, officer, employee, or agent to repay such amount if it is ultimately determined that the person is not entitled to be indemnified by the School as provided in these Bylaws. This advancement does not apply in suits brought by the School or the State or Federal Government against a director, officer, employee, or agent in civil or criminal proceedings.

Section 9.4 Insurance. The School may purchase and maintain insurance on behalf of any person who is or was a director, officer, employee, or agent of the School, or is or was serving at the request of the School as a director, officer, partner, manager, member, trustee, employee, or agent of another corporation, partnership, joint venture, limited liability company, trust, or other enterprise against any liability asserted against the person and incurred by the person in any such capacity or arising out of his or her status as such, whether or not the School would have the power to indemnify the person against such liability.

Section 9.5 Indemnification Required. To the extent that a director, officer, employee, or agent of the School has been successful on the merits or otherwise in defense of any action, suit, or proceeding referred to in these Bylaws or in defense of any claim, issue, or matter within an action, suit, or proceeding, the person shall be indemnified against expenses (including attorneys' fees) actually and reasonably incurred by the person in connection with the action, suit, or proceeding.

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provision for the payment of all liabilities of the School, dispose of all of the assets by transferring and conveying the assets to one or more organizations exempt from federal income taxation under section 501(c)(3) of the Code, in the following order of priority: (a) to a successor organization to the School, if any, (b) the Archbishop of the Archdiocese of Oklahoma City and the Bishop of Tulsa, or (c) to one or more Catholic organizations with charitable, religious, and educational purposes similar to the purposes of the School, as determined by a majority vote of all of the directors with the approval of the Members.

ARTICLE XII

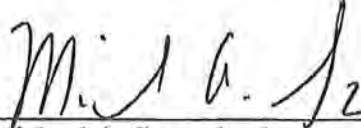
Amendments

Section 12.1 Bylaws. These Bylaws may be amended, altered, restated, or repealed, or new bylaws may be adopted, by a majority vote of the directors present and voting at a meeting of the directors at which a quorum is present, subject to the approval of the Members.

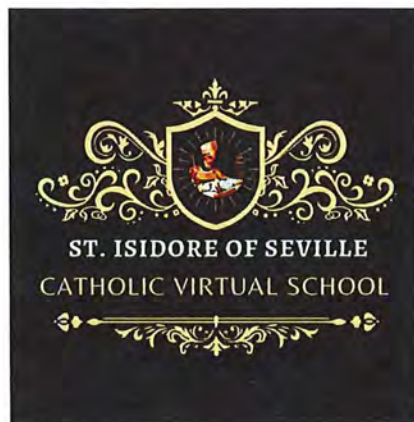
Section 12.2 Certificate. The undersigned does hereby certify that the foregoing Bylaws were duly and regularly adopted as such by the Members and that the above and foregoing Bylaws are in full force and effect.

CERTIFICATE OF SECRETARY

I, the undersigned, certify that I am the presently elected and acting Secretary of **Saint Isidore of Seville Virtual Charter School, Inc.**, a not-for-profit Oklahoma Corporation, and that the above Bylaws are the Bylaws of this Corporation as duly adopted by the Board on 27th day of January 2023, *the Third Friday of Ordinary Time*, and as approved by the Members.



Michael A. Scaperlanda
Secretary



Section 13: Appendix F: Section 2- Statements of Assurances

**STATEMENT OF
ASSURANCES**

The undersigned, Lara Schuler, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);

3. Guarantees access to education and equity for all eligible students regardless of their race ethnicity, economic status, academic ability, or other factors subject to the provisions in Paragraph 1 above;

4. Guarantees to establish the components necessary to begin school operations in the State of Oklahoma on July 1 of the first year;

5. Secures and occupies a school administration facility;

6. Purchases and implements a state-approved school financial system;

7. Purchases and implements state-approved student information system; and

8. Secures connectivity to state reporting

systems. EXECUTED this 27 day of January

2023.

Lara Schuler

(name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of Oklahoma

County of Oklahoma

The foregoing instrument was acknowledged before me on 1/27/23 (date) by Lara Schuler
(name(s) of person(s)).

(Seal, if any)



Rosemary G. Lewis

Signature of Notarial Officer

Notary Public

Title (and Rank)

My commission expires: Jan. 26, 2022

**STATEMENT OF
ASSURANCES**

The undersigned, Michael Scaperlanda, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);

3. Guarantees access to education and equity for all eligible students regardless of their race ethnicity, economic status, academic ability, or other factors subject to the provisions in Paragraph 1 above;

4. Guarantees to establish the components necessary to begin school operations in the State of Oklahoma on July 1 of the first year;

5. Secures and occupies a school administration facility;


6. Purchases and implements a state-approved school financial system;

7. Purchases and implements state-approved student information system; and

8. Secures connectivity to state reporting

systems. EXECUTED this 27th day of January

2023.



Michael A. Scaperlanda

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of Oklahoma

County of Oklahoma

The foregoing instrument was acknowledged before me on 1/27/23 (date) by Michael A. Scaperlanda
(name(s) of person(s)).

(Seal, if any)



Rosemary G. Lewis

Signature of Notarial Officer

Notary Public

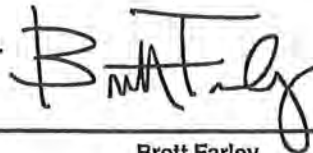
Title (and Rank)

My commission expires: Jan. 22, 2026

**STATEMENT OF
ASSURANCES**

The undersigned, Brett Farley, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.
 2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);
 3. Guarantees access to education and equity for all eligible students regardless of their race ethnicity, economic status, academic ability, or other factors subject to the provisions in Paragraph 1 above;
 4. Guarantees to establish the components necessary to begin school operations in the State of Oklahoma on July 1 of the first year;
 5. Secures and occupies a school administration facility;
 6. Purchases and implements a state-approved school financial system;
 7. Purchases and implements state-approved student information system; and
 8. Secures connectivity to state reporting
- systems. EXECUTED this 27th day of January 2023.



Brett Farley (name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

**STATEMENT OF
ASSURANCES**

The undersigned, **Den. Harrison H. Garlick**, as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);

3. Guarantees access to education and equity for all eligible students regardless of their race ethnicity, economic status, academic ability, or other factors subject to the provisions in Paragraph 1 above;

4. Guarantees to establish the components necessary to begin school operations in the State of Oklahoma on July 1 of the first year;

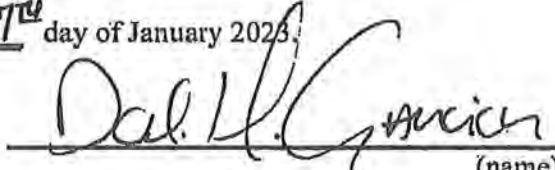
5. Secures and occupies a school administration facility;

6. Purchases and implements a state-approved school financial system;

7. Purchases and implements state-approved student information system; and

8. Secures connectivity to state reporting systems.

EXECUTED this 27th day of January 2023.


(name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of OKLAHOMA

County of TULSA

The foregoing instrument was acknowledged before me on 27/1/23 (date) by HARRISON GARLICK
(name(s) of person(s)).

(Seal, if any)

Mary E. McGivray
Signature of Notarial Officer

My commission expires: 23 FEB 24



**STATEMENT OF
ASSURANCES**

The undersigned, David Dean as a member of the Board of Directors ("Board") of St. Isidore of Seville Catholic Virtual School, an Oklahoma not-for-profit corporation, SISCVS, being first duly sworn and under oath certifies that, as a member of the Board, he/she shall take any and all steps necessary to ensure that SISCVS:

1. Fully complies with the Oklahoma public charter school regulations, including, but not limited to, all statutes, regulations, and requirements of the United States of America, the State of Oklahoma, the Oklahoma Statewide Virtual Charter School Board, and the Oklahoma Department of Education to the extent required by law, including the First Amendment, religious exemptions, and the Religious Freedom Restoration Act, with priority given to the Catholic Church's understanding of itself and its rights and obligations pursuant to the Code of Canon Law and the Catechism of the Catholic Church.

2. Abides, in all respects, with the Oklahoma Open Meeting Act (25 O.S. §§ 301-314) and the Oklahoma Open Records Act (51 O.S. §§ 24A.1-24A.31);

3. Guarantees access to education and equity for all eligible students regardless of their race ethnicity, economic status, academic ability, or other factors subject to the provisions in Paragraph 1 above;

4. Guarantees to establish the components necessary to begin school operations in the State of Oklahoma on July 1 of the first year;

5. Secures and occupies a school administration facility;

6. Purchases and implements a state-approved school financial system;

7. Purchases and implements state-approved student information system; and

8. Secures connectivity to state reporting

systems. EXECUTED this 27 day of January

2023.



(name)

OKLAHOMA NOTARY ACKNOWLEDGMENT

State of OKLAHOMA

County of TULSA

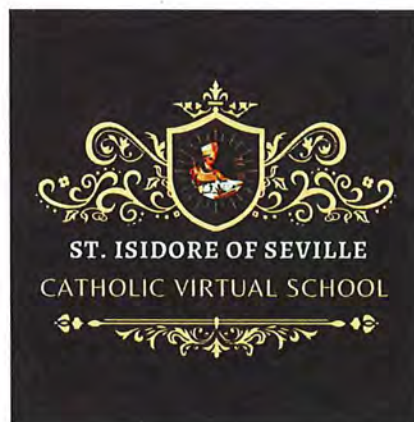
The foregoing instrument was acknowledged before me on 27 Jan 23 (date) by David Dean
(name(s) of person(s)).

(Seal, if any)

Mary E. McGilvray
Signature of Notarial Officer

My commission expires: 23 FEB 24





Section 13: Appendix F: Section 3- Conflict of Interest Policy Forms

**Board Member Conflict of Interests Disclosure
Form**

St. Isidore of Seville Catholic Virtual School, Inc.

Date: January 27, 2023
Name: Lara A. Schuler

A conflict of interest, or an appearance of a conflict, can arise whenever a transaction, or an action, of St. Isidore of Seville Catholic Virtual School Inc. conflicts with the personal interests, financial or otherwise, of that of a Board Member, or an immediate family member of a Board Member ("affiliated persons"), or that the Board Member's employer (collectively "your personal interests").

Below is a questionnaire designed to determine if the above-named Board Member has any relationships, party to any transaction, or holds any positions (volunteer or otherwise) that may create a conflict of interest, now or in the future, between St. Isidore of Seville Catholic Virtual School, Inc. and the personal interests of the named Board Member.

1. List any employers or others that you have provided goods or services to within the past two months. (applies to those that contributed over 25% or more of your total yearly income)

Archdiocese of Oklahoma City

2. Are you or have you been a member of the board of directors, an officer, or principal of any corporation, company, association, institution, or other business within the last year? If so, please name the organization and the position you held.

Schuler Transport, Inc - VP

3. Other than incidental ownership, do you or affiliated persons, have direct or indirect ownership of other financial interest in any corporation, company, institution, or other business? (incidental refers to less than 10% ownership of the voting stock or other voting rights)

No

4. Are you aware of any past or prospective involvement by you, or affiliated persons, in activity within the past year, or will be in the next year, that could be reasonably interpreted as a possible conflict of interest or could reasonably be viewed as having an appearance of a divided interest or loyalty on your part? If so, please describe.

No

5. Do you, or affiliated persons, have any private business activity or personal services with this St. Isidore of Seville Catholic Virtual School, Inc. or its affiliated organizations? If so, please explain.

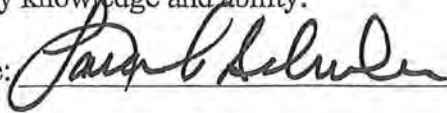
No

6. Are you aware of any other events, transactions, arrangements, or other situations that have occurred or may occur in the future that you believe should be disclosed to the Board of St. Isidore of Seville Catholic Virtual School, Inc.?

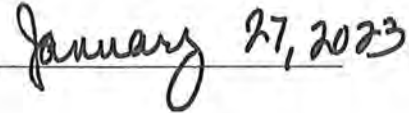
No

I understand that it is my obligation to disclose a conflict of interest, or appearance of a conflict, to the President of the Board when a conflict, or appearance of a conflict, arises, and that for transactions in which I have a conflict, I will abstain from any vote or debate on the matter involving said conflict. I, the undersigned, further certify that the above is true and correct to the best of my knowledge and ability.

Signature:



Date:



**Board Member Conflict of Interests Disclosure
Form**

St. Isidore of Seville Catholic Virtual School, Inc.

Date: 11/27/23

Name: David Dean

A conflict of interest, or an appearance of a conflict, can arise whenever a transaction, or an action, of St. Isidore of Seville Catholic Virtual School Inc. conflicts with the personal interests, financial or otherwise, of that of a Board Member, or an immediate family member of a Board Member ("affiliated persons"), or that the Board Member's employer (collectively "your personal interests").

Below is a questionnaire designed to determine if the above-named Board Member has any relationships, party to any transaction, or holds any positions (volunteer or otherwise) that may create a conflict of interest, now or in the future, between St. Isidore of Seville Catholic Virtual School, Inc. and the personal interests of the named Board Member.

1. List any employers or others that you have provided goods or services to within the past two months. (applies to those that contributed over 25% or more of your total yearly income)

Diocese of Tulsa and Eastern Oklahoma

2. Are you or have you been a member of the board of directors, an officer, or principal of any corporation, company, association, institution, or other business within the last year? If so, please name the organization and the position you held.

St. Francis of Assisi Trust

Veritas Scholarship Granting Organization Board

3. Other than incidental ownership, do you or affiliated persons, have direct or indirect ownership of other financial interest in any corporation, company, institution, or other business? (incidental refers to less than 10% ownership of the voting stock or other voting rights)

No

4. Are you aware of any past or prospective involvement by you, or affiliated persons, in activity within the past year, or will be in the next year, that could be reasonably interpreted as a possible conflict of interest or could reasonably be viewed as having an appearance of a divided interest or loyalty on your part? If so, please describe.

No

5. Do you, or affiliated persons, have any private business activity or personal services with this St. Isidore of Seville Catholic Virtual School, Inc. or its affiliated organizations? If so, please explain.

No

6. Are you aware of any other events, transactions, arrangements, or other situations that have occurred or may occur in the future that you believe should be disclosed to the Board of St. Isidore of Seville Catholic Virtual School, Inc.?

No

I understand that it is my obligation to disclose a conflict of interest, or appearance of a conflict, to the President of the Board when a conflict, or appearance of a conflict, arises, and that for transactions in which I have a conflict, I will abstain from any vote or debate on the matter involving said conflict. I, the undersigned, further certify that the above is true and correct to the best of my knowledge and ability.

Signature:  Date: 1/27/23

**Board Member Conflict of Interests Disclosure
Form**

St. Isidore of Seville Catholic Virtual School, Inc.

Date: January 27, 2023

Name: Michael Scaperlanda

A conflict of interest, or an appearance of a conflict, can arise whenever a transaction, or an action, of St. Isidore of Seville Catholic Virtual School Inc. conflicts with the personal interests, financial or otherwise, of that of a Board Member, or an immediate family member of a Board Member ("affiliated persons"), or that the Board Member's employer (collectively "your personal interests").

Below is a questionnaire designed to determine if the above-named Board Member has any relationships, party to any transaction, or holds any positions (volunteer or otherwise) that may create a conflict of interest, now or in the future, between St. Isidore of Seville Catholic Virtual School, Inc. and the personal interests of the named Board Member.

1. List any employers or others that you have provided goods or services to within the past two months. (applies to those that contributed over 25% or more of your total yearly income)

Archdiocese of Oklahoma City

2. Are you or have you been a member of the board of directors, an officer, or principal of any corporation, company, association, institution, or other business within the last year? If so, please name the organization and the position you held.

Blessed Stanley Rother Shrine, Inc., Board Member
Catholic Foundation of Oklahoma, Inc., Board Member
American Saint, LLC, Managing Partner

3. Other than incidental ownership, do you or affiliated persons, have direct or indirect ownership of other financial interest in any corporation, company, institution, or other business? (incidental refers to less than 10% ownership of the voting stock or other voting rights)

No

4. Are you aware of any past or prospective involvement by you, or affiliated persons, in activity within the past year, or will be in the next year, that could be reasonably interpreted as a possible conflict of interest or could reasonably be viewed as having an appearance of a divided interest or loyalty on your part? If so, please describe.

No

5. Do you, or affiliated persons, have any private business activity or personal services with this St. Isidore of Seville Catholic Virtual School, Inc. or its affiliated organizations? If so, please explain.

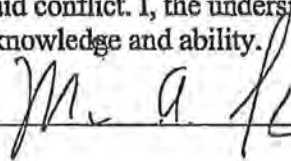
I am employed by the Archdiocese of Oklahoma City. The Archbishop of Oklahoma City is one of the two Members of St. Isidore of Seville Catholic Virtual School, Inc.

6. Are you aware of any other events, transactions, arrangements, or other situations that have occurred or may occur in the future that you believe should be disclosed to the Board of St. Isidore of Seville Catholic Virtual School, Inc.?

No

I understand that it is my obligation to disclose a conflict of interest, or appearance of a conflict, to the President of the Board when a conflict, or appearance of a conflict, arises, and that for transactions in which I have a conflict, I will abstain from any vote or debate on the matter involving said conflict. I, the undersigned, further certify that the above is true and correct to the best of my knowledge and ability.

Signature:



Date: January 23, 2023

**Board Member Conflict of Interests Disclosure
Form**
St. Isidore of Seville Catholic Virtual School, Inc.

Date: 27 January 2023

Name: Brett Farley

A conflict of interest, or an appearance of a conflict, can arise whenever a transaction, or an action, of St. Isidore of Seville Catholic Virtual School Inc. conflicts with the personal interests, financial or otherwise, of that of a Board Member, or an immediate family member of a Board Member ("affiliated persons"), or that the Board Member's employer (collectively "your personal interests").

Below is a questionnaire designed to determine if the above-named Board Member has any relationships, party to any transaction, or holds any positions (volunteer or otherwise) that may create a conflict of interest, now or in the future, between St. Isidore of Seville Catholic Virtual School, Inc. and the personal interests of the named Board Member.

1. List any employers or others that you have provided goods or services to within the past two months. (applies to those that contributed over 25% or more of your total yearly income)

Catholic Conference of Oklahoma

2. Are you or have you been a member of the board of directors, an officer, or principal of any corporation, company, association, institution, or other business within the last year? If so, please name the organization and the position you held.

Veritas Media, LLC

Monsoon, LLC

Catholic Conference of Oklahoma

3. Other than incidental ownership, do you or affiliated persons, have direct or indirect ownership of other financial interest in any corporation, company, institution, or other business? (incidental refers to less than 10% ownership of the voting stock or other voting rights)

Veritas Media, LLC

Monsoon Media, LLC

4. Are you aware of any past or prospective involvement by you, or affiliated persons, in activity within the past year, or will be in the next year, that could be reasonably interpreted as a possible conflict of interest or could reasonably be viewed as having an appearance of a divided interest or loyalty on your part? If so, please describe.

No

5. Do you, or affiliated persons, have any private business activity or personal services with this St. Isidore of Seville Catholic Virtual School, Inc. or its affiliated organizations? If so, please explain.

No

6. Are you aware of any other events, transactions, arrangements, or other situations that have occurred or may occur in the future that you believe should be disclosed to the Board of St. Isidore of Seville Catholic Virtual School, Inc.?

No

I understand that it is my obligation to disclose a conflict of interest, or appearance of a conflict, to the President of the Board when a conflict, or appearance of a conflict, arises, and that for transactions in which I have a conflict, I will abstain from any vote or debate on the matter involving said conflict. I, the undersigned, further certify that the above is true and correct to the best of my knowledge and ability.

Signature: B. H. Ly Date: 27 January 2023

**Board Member Conflict of Interests Disclosure
Form**

St. Isidore of Seville Catholic Virtual School, Inc.

Date: 01-27-23

Name: Dr. Hannibal Garcia

A conflict of interest, or an appearance of a conflict, can arise whenever a transaction, or an action, of St. Isidore of Seville Catholic Virtual School Inc. conflicts with the personal interests, financial or otherwise, of that of a Board Member, or an immediate family member of a Board Member ("affiliated persons"), or that the Board Member's employer (collectively "your personal interests").

Below is a questionnaire designed to determine if the above-named Board Member has any relationships, party to any transaction, or holds any positions (volunteer or otherwise) that may create a conflict of interest, now or in the future, between St. Isidore of Seville Catholic Virtual School, Inc. and the personal interests of the named Board Member.

1. List any employers or others that you have provided goods or services to within the past two months. (applies to those that contributed over 25% or more of your total yearly income)

Diocese of Tucson

2. Are you or have you been a member of the board of directors, an officer, or principal of any corporation, company, association, institution, or other business within the last year? If so, please name the organization and the position you held.

Bishop Kenny High School Virtual Tax School Schoolships

Catholic Community

St. Francis Medical Assistance Trust

Catholic Foundation of Portland Oklahoma

-
-
3. Other than incidental ownership, do you or affiliated persons, have direct or indirect ownership of other financial interest in any corporation, company, institution, or other business? (incidental refers to less than 10% ownership of the voting stock or other voting rights)

do.

4. Are you aware of any past or prospective involvement by you, or affiliated persons, in activity within the past year, or will be in the next year, that could be reasonably interpreted as a possible conflict of interest or could reasonably be viewed as having an appearance of a divided interest or loyalty on your part? If so, please describe.

do.

5. Do you, or affiliated persons, have any private business activity or personal services with this St. Isidore of Seville Catholic Virtual School, Inc. or its affiliated organizations? If so, please explain.

do.

6. Are you aware of any other events, transactions, arrangements, or other situations that have occurred or may occur in the future that you believe should be disclosed to the Board of St. Isidore of Seville Catholic Virtual School, Inc.?

do.

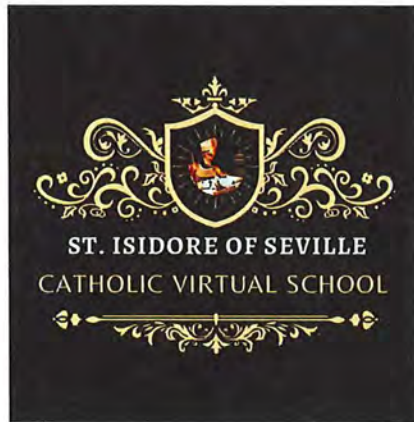
I understand that it is my obligation to disclose a conflict of interest, or appearance of a conflict, to the President of the Board when a conflict, or appearance of a conflict, arises, and that for transactions in which I have a conflict, I will abstain from any vote or debate on the matter involving said conflict. I, the undersigned, further certify that the above is true and correct to the best of my knowledge and ability.

Signature:

Dee L. G. Garcia

Date:

1-27-23



Section 13: Appendix F: Section 4- Board Meeting Minutes

ORGANIZATIONAL BOARD MEETING MINUTES

January 27, 2023
7501 NW Expressway,
Oklahoma City, OK

AGENDA

Attendees:

Deacon Harrison Garlick , Board Member
Michael Scaperlanda, Board member
Brett Farley, Board Member
David Dean, Board Member
Lara Schuler, Board Member

(Virtually: Via Zoom)

1. **Call to Order** – Michael Scaperlanda, Board Member
 - i. Meeting called to order at 3:30 by Michael Scaperlanda, Board Member.
2. **Roll Call and Introductions of Board Members — Present**
 - Present
3. **Preliminary Action Items**
 - Introductions
 - Appointment of Founding
 - Presentation and Approval of Organizational Documents –
 - i. General Not-Profit Bylaws & Meeting Rules
 1. Motion to approve the corporation documents, bylaws and officer roles as presented by Brett Farley, seconded by David Dean. Unanimously approved.
 - ii. Conflict of Interest Statement Document
 1. Motion to approve the conflict-of-interest document as presented by Brett Farley. Seconded by David Dean. Unanimously approved.
 - iii. Statement of Assurances
 1. Motion to approve the statement of assurances as presented by Michael Scaperlanda. Seconded by David. Unanimously approved.
4. **Action Items**

- Motion to move forward with a Religious Charter Application for St. Isidore of Seville Catholic Virtual School to be submitted by Lara Schuler to the State Virtual Charter Board. Motion by Brett Farley and seconded by David Dean. Unanimously approved.

5. Information Items

- Follow-up meeting with the Statewide Virtual School Board members and staff, February 14th at 2:00 p.m..

6. Additional Comments from the Board

- 7. Adjournment** –Brett Farley moved to adjourn. Seconded by David Dean. Meeting ended at 3:45

THE SAINT ISIDORE OF SEVILLE VIRTUAL CHARTER SCHOOL INC.

January 27, 2023

Friday of the Third Week in Ordinary Time

Resolutions

The undersigned Secretary of Saint Isidore of Seville Virtual Charter School, Inc. ("Corporation"), an Oklahoma not for profit corporation, certifies that the following RESOLUTIONS were adopted by the Board of Directors of the Corporation at a meeting of the Board on the 27th day of January, 2023, duly called, pursuant to the Certificate of Incorporation and the Bylaws:

1. WHEREAS, a Certificate of Incorporation was filed this day establishing the Corporation;

NOW, THEREFORE, BE IT RESOLVED, that the attached Bylaws of said Corporation, dated this day, are hereby adopted.

2. WHEREAS, the inaugural Board of Directors finds it necessary to elect officers to hold office until such time as their successors are duly elected.

NOW, THEREFORE, BE IT RESOLVED, that Michael Scaperlanda serve as Board Chair, Dcn. Harrison Garlick serve as Secretary, and Lara Schuler serve as Treasurer.

3. WHEREAS, the Corporation was created for the purpose of applying for and operating a virtual charter school within the state of Oklahoma.

NOW, THEREFORE, BE IT RESOLVED, that the Board authorizes the Corporate Treasurer to submit the application to operate a virtual charter school to the Virtual Charter School Board for the State of Oklahoma together with the Conflict of Interest Statement and the Statement of Assurances.

4. FURTHER RESOLVED, that any prior execution or delivery of documents, or prior actions of the Corporation, taken in furtherance of the foregoing are hereby confirmed or ratified.

CERTIFICATE OF SECRETARY

I, the undersigned, certify that I am the presently elected and acting Secretary of Saint Isidore of Seville Virtual Charter School, Inc., an Oklahoma not for profit Corporation, and the above RESOLUTION(S) were duly adopted by the Board of Directors on the 27th day of January, 2023.



Dcn. Harrison Garlick
Secretary

Saint Isidore of Seville Virtual Charter School, Inc.

THE SAINT ISIDORE OF SEVILLE VIRTUAL CHARTER SCHOOL INC.

January 27, 2023

Friday of the Third Week in Ordinary Time

Resolutions

The undersigned Secretary of Saint Isidore of Seville Virtual Charter School, Inc. ("Corporation"), an Oklahoma not for profit corporation, certifies that the following RESOLUTIONS were adopted by the Board of Directors of the Corporation at a meeting of the Board on the 27th day of January, 2023, duly called, pursuant to the Certificate of Incorporation and the Bylaws:

1. WHEREAS, a Certificate of Incorporation was filed this day establishing the Corporation;

NOW, THEREFORE, BE IT RESOLVED, that the attached Bylaws of said Corporation, dated this day, are hereby adopted.

2. WHEREAS, the inaugural Board of Directors finds it necessary to elect officers to hold office until such time as their successors are duly elected.

NOW, THEREFORE, BE IT RESOLVED, that Michael Scaperlanda serve as Board Chair, Dcn. Harrison Garlick serve as Secretary, and Lara Schuler serve as Treasurer.

3. WHEREAS, the Corporation was created for the purpose of applying for and operating a virtual charter school within the state of Oklahoma.

NOW, THEREFORE, BE IT RESOLVED, that the Board authorizes the Corporate Treasurer to submit the application to operate a virtual charter school to the Virtual Charter School Board for the State of Oklahoma together with the Conflict of Interest Statement and the Statement of Assurances.

4. FURTHER RESOLVED, that any prior execution or delivery of documents, or prior actions of the Corporation, taken in furtherance of the foregoing are hereby confirmed or ratified.

CERTIFICATE OF SECRETARY

I, the undersigned, certify that I am the presently elected and acting Secretary of Saint Isidore of Seville Virtual Charter School, Inc., an Oklahoma not for profit Corporation, and the above RESOLUTION(S) were duly adopted by the Board of Directors on the 27th day of January, 2023.



Dcn. Harrison Garlick

Secretary

Saint Isidore of Seville Virtual Charter School, Inc.

THE SAINT ISIDORE OF SEVILLE VIRTUAL CHARTER SCHOOL INC.

January 27, 2023
Friday of the Third Week in Ordinary Time

Resolutions by the Members

The undersigned Secretary of Saint Isidore of Seville Virtual Charter School, Inc. ("Corporation"), an Oklahoma not for profit corporation, certifies that the following RESOLUTIONS were duly adopted by the Members of the Corporation—the Archbishop of Oklahoma City and the Bishop of Tulsa—on the 27th day of January, 2023, duly called, pursuant to the Certificate of Incorporation and the Bylaws:

I. RESOLUTION ONE

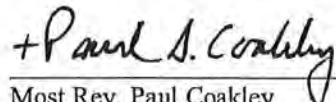
RESOLVED, that the Certificate and Bylaws, as presented on January 27, 2023, are approved and adopted for use for the Corporation.

II. RESOLUTION TWO

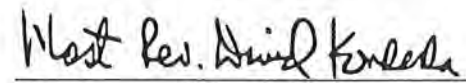
RESOLVED, that the following persons are approved to serve on the Board of Directors of the Corporation:

Michael Scaperlanda	7501 Northwest Expressway Oklahoma City, Oklahoma 73132
David Dean	12300 E. 91st Street South Broken Arrow, OK 74012
Brett Farley	7501 Northwest Expressway Oklahoma City, Oklahoma 73132
Dcn. Harrison Garlick	12300 E. 91st Street South Broken Arrow, OK 74012
Lara Schuler	7501 Northwest Expressway Oklahoma City, Oklahoma 73132

In attestation of the adoption of the aforementioned RESOLUTIONS:



Most Rev. Paul Coakley
Archbishop of Oklahoma City




Most Rev. David Konderla
Bishop of Tulsa



CERTIFICATE OF SECRETARY

I, the undersigned, certify that I am the presently elected and acting Secretary of Saint Isidore of Seville Virtual Charter School, Inc., an Oklahoma not for profit Corporation, and the above RESOLUTION(S) were duly adopted by the Members of the Corporation on the 27th day of January, 2023.



Dcn. Harrison Garlick
Secretary
Saint Isidore of Seville Virtual Charter School, Inc.

THE SAINT ISIDORE OF SEVILLE VIRTUAL CHARTER SCHOOL INC.

January 27, 2023
Friday of the Third Week in Ordinary Time

Resolutions by the Members

The undersigned Secretary of Saint Isidore of Seville Virtual Charter School, Inc. ("Corporation"), an Oklahoma not for profit corporation, certifies that the following RESOLUTIONS were duly adopted by the Members of the Corporation—the Archbishop of Oklahoma City and the Bishop of Tulsa—on the 27th day of January, 2023, duly called, pursuant to the Certificate of Incorporation and the Bylaws:

I. RESOLUTION ONE

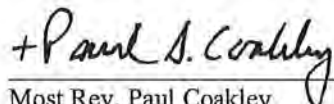
RESOLVED, that the Certificate and Bylaws, as presented on January 27, 2023, are approved and adopted for use for the Corporation.

II. RESOLUTION TWO

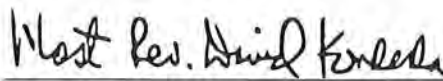
RESOLVED, that the following persons are approved to serve on the Board of Directors of the Corporation:

Michael Scaperlanda	7501 Northwest Expressway Oklahoma City, Oklahoma 73132
David Dean	12300 E. 91st Street South Broken Arrow, OK 74012
Brett Farley	7501 Northwest Expressway Oklahoma City, Oklahoma 73132
Dcn. Harrison Garlick	12300 E. 91st Street South Broken Arrow, OK 74012
Lara Schuler	7501 Northwest Expressway Oklahoma City, Oklahoma 73132

In attestation of the adoption of the aforementioned RESOLUTIONS:



Most Rev. Paul Coakley
Archbishop of Oklahoma City



Most Rev. David Konderla
Bishop of Tulsa

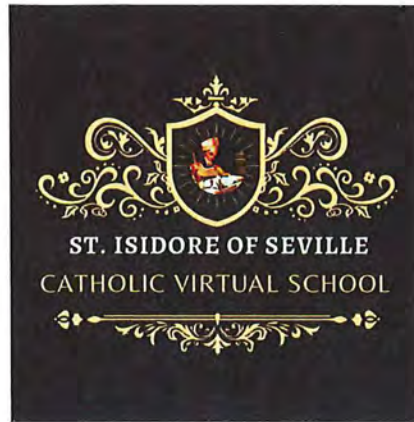


CERTIFICATE OF SECRETARY

I, the undersigned, certify that I am the presently elected and acting Secretary of Saint Isidore of Seville Virtual Charter School, Inc., an Oklahoma not for profit Corporation, and the above RESOLUTION(S) were duly adopted by the Members of the Corporation on the 27th day of January, 2023.



Dcn. Harrison Garlick
Secretary
Saint Isidore of Seville Virtual Charter School, Inc.

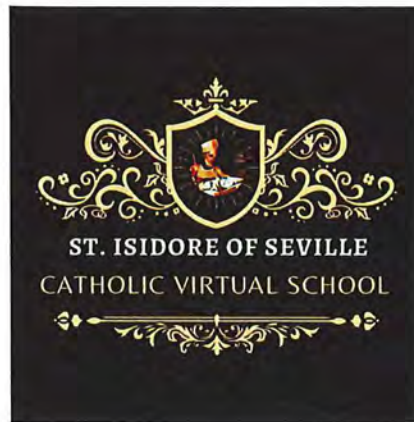


Section 13: Appendix G: Start-up Plan

St. Isidore of Seville Catholic Virtual School
Oklahoma FY2024 ARCH OKC Department of
Catholic Education Fee Schedule for Start
Up Year

Description	Fee	Explanation
Curriculum & Materials, SISCVS System, and Instructional Support Services	\$1,300/pupil/yr - upfront fee of \$260 and \$104 billed monthly, over a maximum of 10 months	Fee includes Curriculum including Core, Elective, Career/Technical, and Advanced Placement (AP) Courses; Balanced assessment system; SISCVS System including SIS, LMS, in course email and schoolwide communication system; Web Conference technology integrated into SISCVS; Any online and physical textbooks/materials, with the exception of those for AP courses; Teacher Professional Development
Student Technology Assistance Services	\$300/pupil/yr.	Fee includes Logistics, purchasing, warehousing, and fulfillment service for student device distribution; Set-up, configuration, and device provisioning; Shipment, maintenance, repair, reclamation and refurbishment for the life of the device; Software and virus protection for device, as needed
Enrollment Processing	\$100/pupil (gross new only) - upfront fee	Telephone, Live Chat, Web Form, Email access to Support Agents; Monitor help desk queues during support hours of 8:00 am – 8:00 pm EST/EDT; Multilingual English/Spanish support options; Support tickets will be addressed within the parameters of the SLA for that priority; Major incident management will assure effective communications of issue status and resolution; Coordination with secondary support teams (e.g. network operations, systems engineering) as required; Scheduled recurring onboarding webinars for new students to assist with school start; Management of self-help SISCVS support and resources website with access to online help documents and videos for parents/guardians/students
Community Outreach, School Website	\$300/pupil/yr. - billed monthly	Fee includes Assisting parents/guardians of new students with the school enrollment process, including following up with lead inquiries to describe the school program offering and help families determine if the school is a good fit for their student; Collecting required compliancy documents for enrolling students;
Student Computers	\$425 per device; \$10.50 Go- Guardian; \$8.50 for hotspots as needed (100 in budget)	Fee includes: Development of marketing plan and implementation to meet desired enrollment targets; Management of school public website development and maintenance; School branding across both digital and print assets; Conducting school

		satisfaction surveys with enrolled families to share with local school teams; Management of school social media pages, including providing real-time support and responses to parent inquiries; Assist in promoting school events; Support collateral, design, and copy needs for school. Internet data plan included in the price of the Chromebook
Admin Payroll Processing	\$42.50 per employee per pay period	Fee includes: New hire data entry; Recruiting systems integration; Offer letter drafting and issuing; Coordination of new hire needs such as hardware and software; Employee qualification review; Systems integration with benefits vendors; Benefits plan audits; Administration of open enrollment; Processing of qualifying life events; Payroll system configuration; Biweekly data entry of payroll; Stipend processing; Physical check requests; Pay card issuance; Compliance audits for compensation, payroll, and benefits
School Operations Support Services	12% of Total Revenue, billed monthly based on revenue received	Fee Includes Human Resource Generalist Support, School Leadership Support and Development, Accreditation Support; Academic Programming Guidance and Support; External Reporting Support, State Testing Support, Staff Technology Support, Special Education Support, Gifted Program Support, Homeless and Migrant Services Support, School Counseling and Family Support Programming Guidance, Accessibility Support, ELL Support, Additional recruiting fees if needed
School Business Support Services	2% of Total Revenue, billed monthly based on revenue received	Fee includes School Budgeting & Planning, Pupil Accounting, Federal Programs & Compliance Support, Student ISP Stipend Administration, Procurement, Audit Support (as needed), Insurance/Risk Management Support, Facility Support, Records Security and Management



Section 13: Appendix H: Budget Documents

St. Isidore of Seville Catholic Virtual School

Appendix H Funding Formula Support

First Half of Year 1

Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor?	Base Funding
K - Full Day	15.0	1.330	20.0	\$ 1,971.90	1.000	\$ 39,339.41
1-2	40.0	1.330	53.2	\$ 1,971.90	1.000	\$ 104,905.08
3	30.0	1.330	39.9	\$ 1,971.90	1.000	\$ 78,678.81
4-6	115.0	1.330	153.0	\$ 1,971.90	1.000	\$ 301,602.11
7-12	300.0	1.330	399.0	\$ 1,971.90	1.000	\$ 786,788.10
Economically Disadvantaged	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
ELL (Bilingual)	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
Gifted	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
SPED - Specific Learning Disability	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
SPED - Other Health Impairment	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
Weighted Salary Incentive Aid	0.0	0.000	665.0	\$ 93.83	20.000	\$ 1,247,939.00
	0.0	0.000	0.0	0	1.000	\$ 0.00
Year 1 Cash pre-Q1 count True-up						\$ 2,559,252.50

2nd Half of Year 1

Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor?	Base Funding
K - Full Day	15.0	1.500	22.5	\$ 1,971.90	1.000	\$ 44,367.75
1-2	40.0	1.351	54.0	\$ 1,971.90	1.000	\$ 106,561.48
3	30.0	1.051	31.5	\$ 1,971.90	1.000	\$ 62,174.01
4-6	115.0	1.000	115.0	\$ 1,971.90	1.000	\$ 226,768.50
7-12	300.0	1.200	360.0	\$ 1,971.90	1.000	\$ 709,884.00
Economically Disadvantaged	250.0	0.250	62.5	\$ 1,971.90	1.000	\$ 123,243.75
ELL (Bilingual)	25.0	0.250	6.3	\$ 1,971.90	1.000	\$ 12,324.38
Gifted	20.0	0.340	6.8	\$ 1,971.90	1.000	\$ 13,408.92

SPED - Specific Learning Disability	25.0	0.400	10.0	\$ 1,971.90	1.000	\$ 19,719.00
SPED - Other Health Impairment	50.0	1.200	60.0	\$ 1,971.90	1.000	\$ 118,314.00
Weighted Salary Incentive Aid	0.0	0.000	665.0	\$ 93.83	20.000	\$ 1,247,939.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
						\$ 2,684,704.78

Year 2						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	15.0	1.500	22.5	\$ 1,971.90	1.000	\$ 44,367.75
1-2	40.0	1.351	54.0	\$ 1,971.90	1.000	\$ 106,561.48
3	30.0	1.051	31.5	\$ 1,971.90	1.000	\$ 62,174.01
4-6	115.0	1.000	115.0	\$ 1,971.90	1.000	\$ 226,768.50
7-12	300.0	1.200	360.0	\$ 1,971.90	1.000	\$ 709,884.00
Economically Disadvantaged	250.0	0.250	62.5	\$ 1,971.90	1.000	\$ 123,243.75
ELL (Bilingual)	25.0	0.250	6.3	\$ 1,971.90	1.000	\$ 12,324.38
Gifted	25.0	0.340	8.5	\$ 1,971.90	1.000	\$ 16,761.15
SPED - Specific Learning Disability	25.0	0.400	10.0	\$ 1,971.90	1.000	\$ 19,719.00
SPED - Other Health Impairment	50.0	1.200	60.0	\$ 1,971.90	1.000	\$ 118,314.00
Weighted Salary Incentive Aid	0.0	0.000	665.0	\$ 93.83	20.000	\$ 1,247,939.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
						\$ 2,688,057.01

Year 3						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	50.0	1.500	75.0	\$ 1,971.90	1.000	\$ 147,892.50
1-2	110.0	1.351	148.6	\$ 1,971.90	1.000	\$ 293,044.06
3	65.0	1.051	68.3	\$ 1,971.90	1.000	\$ 134,710.35

4-6	235.0	1.000	235.0	\$ 1,971.90	1.000	\$ 463,396.50
7-12	615.0	1.200	738.0	\$ 1,971.90	1.000	\$ 1,455,262.20
Economically Disadvantaged	500.0	0.250	125.0	\$ 1,971.90	1.000	\$ 246,487.50
ELL (Bilingual)	50.0	0.250	12.5	\$ 1,971.90	1.000	\$ 24,648.75
Gifted	50.0	0.340	17.0	\$ 1,971.90	1.000	\$ 33,522.30
SPED - Specific Learning Disability	50.0	0.400	20.0	\$ 1,971.90	1.000	\$ 39,438.00
SPED - Other Health Impairment	150.0	1.200	180.0	\$ 1,971.90	1.000	\$ 354,942.00
Weighted Salary Incentive Aid	0.0	0.000	1330.0	\$ 93.83	20.000	\$ 2,495,878.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
						\$ 5,689,222.16

Year 4						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	60.0	1.500	90.0	\$ 1,971.90	1.000	\$ 177,471.00
1-2	160.0	1.351	216.2	\$ 1,971.90	1.000	\$ 426,245.90
3	85.0	1.051	89.3	\$ 1,971.90	1.000	\$ 176,159.69
4-6	295.0	1.000	295.0	\$ 1,971.90	1.000	\$ 581,710.50
7-12	650.0	1.200	780.0	\$ 1,971.90	1.000	\$ 1,538,082.00
Economically Disadvantaged	625.0	0.250	156.3	\$ 1,971.90	1.000	\$ 308,109.38
ELL (Bilingual)	62.5	0.250	15.6	\$ 1,971.90	1.000	\$ 30,810.94
Gifted	75.0	0.340	25.5	\$ 1,971.90	1.000	\$ 50,283.45
SPED - Specific Learning Disability	75.0	0.400	30.0	\$ 1,971.90	1.000	\$ 59,157.00
SPED - Other Health Impairment	175.0	1.200	210.0	\$ 1,971.90	1.000	\$ 414,099.00
Weighted Salary Incentive Aid	0.0	0.000	1662.5	\$ 93.83	20.000	\$ 3,119,847.50
	0.0	0.000	0.0	\$ -	1.000	\$ -
						\$ 6,881,976.35

Year 5						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	60.0	1.500	90.0	\$ 1,971.90	1.000	\$ 177,471.00
1-2	165.0	1.351	222.9	\$ 1,971.90	1.000	\$ 439,566.09
3	90.0	1.051	94.6	\$ 1,971.90	1.000	\$ 186,522.02
4-6	395.0	1.000	395.0	\$ 1,971.90	1.000	\$ 778,900.50
7-12	790.0	1.200	948.0	\$ 1,971.90	1.000	\$ 1,869,361.20
Economically Disadvantaged	750.0	0.250	187.5	\$ 1,971.90	1.000	\$ 369,731.25
ELL (Bilingual)	75.0	0.250	18.8	\$ 1,971.90	1.000	\$ 36,973.13
Gifted	150.0	0.340	51.0	\$ 1,971.90	1.000	\$ 100,566.90
SPED - Specific Learning Disability	100.0	0.400	40.0	\$ 1,971.90	1.000	\$ 78,876.00
SPED - Other Health Impairment	200.0	1.200	240.0	\$ 1,971.90	1.000	\$ 473,256.00
Weighted Salary Incentive Aid	0.0	0.000	1995.0	\$ 93.83	20.000	\$ 3,743,817.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
						\$ 8,255,041.08

St. Isidore of Seville Catholic Virtual School

Appendix H

Funding Formula Support- 75%

First Half of Year 1

Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor?	Base Funding
K - Full Day	15.0	1.330	20.0	\$ 1,971.90	1.000	\$ 39,339.41
1-2	25.0	1.330	33.3	\$ 1,971.90	1.000	\$ 65,565.68
3	25.0	1.330	33.3	\$ 1,971.90	1.000	\$ 65,565.68
4-6	95.0	1.330	126.4	\$ 1,971.90	1.000	\$ 249,149.57
7-12	215.0	1.330	286.0	\$ 1,971.90	1.000	\$ 563,864.81
Economically Disadvantaged	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
ELL (Bilingual)	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
Gifted	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
SPED - Specific Learning Disability	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
SPED - Other Health Impairment	0.0	1.330	0.0	\$ 1,971.90	1.000	\$ 0.00
Weighted Salary Incentive Aid	0.0	0.000	665.0	\$ 93.83	20.000	\$ 1,247,939.00
	0.0	0.000	0.0	0	1.000	\$ 0.00
Year 1 Cash pre-Q1 count True-up	375.0					\$ 2,231,424.13

2nd Half of Year 1

Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor?	Base Funding
K - Full Day	15.0	1.500	22.5	\$ 1,971.90	1.000	\$ 44,367.75
1-2	25.0	1.351	33.8	\$ 1,971.90	1.000	\$ 66,600.92
3	25.0	1.051	26.3	\$ 1,971.90	1.000	\$ 51,811.67
4-6	95.0	1.000	95.0	\$ 1,971.90	1.000	\$ 187,330.50
7-12	215.0	1.200	258.0	\$ 1,971.90	1.000	\$ 508,750.20
Economically Disadvantaged	250.0	0.250	62.5	\$ 1,971.90	1.000	\$ 123,243.75
ELL (Bilingual)	25.0	0.250	6.3	\$ 1,971.90	1.000	\$ 12,324.38
Gifted	20.0	0.340	6.8	\$ 1,971.90	1.000	\$ 13,408.92

SPED - Specific Learning Disability	25.0	0.400	10.0	\$ 1,971.90	1.000	\$ 19,719.00
SPED - Other Health Impairment	50.0	1.200	60.0	\$ 1,971.90	1.000	\$ 118,314.00
Weighted Salary Incentive Aid	0.0	0.000	665.0	\$ 93.83	20.000	\$ 1,247,939.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
	375.0					\$ 2,393,810.09

Year 2						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	15.0	1.500	22.5	\$ 1,971.90	1.000	\$ 44,367.75
1-2	25.0	1.351	33.8	\$ 1,971.90	1.000	\$ 66,600.92
3	25.0	1.051	26.3	\$ 1,971.90	1.000	\$ 51,811.67
4-6	95.0	1.000	95.0	\$ 1,971.90	1.000	\$ 187,330.50
7-12	215.0	1.200	258.0	\$ 1,971.90	1.000	\$ 508,750.20
Economically Disadvantaged	250.0	0.250	62.5	\$ 1,971.90	1.000	\$ 123,243.75
ELL (Bilingual)	25.0	0.250	6.3	\$ 1,971.90	1.000	\$ 12,324.38
Gifted	25.0	0.340	8.5	\$ 1,971.90	1.000	\$ 16,761.15
SPED - Specific Learning Disability	25.0	0.400	10.0	\$ 1,971.90	1.000	\$ 19,719.00
SPED - Other Health Impairment	50.0	1.200	60.0	\$ 1,971.90	1.000	\$ 118,314.00
Weighted Salary Incentive Aid	0.0	0.000	665.0	\$ 93.83	20.000	\$ 1,247,939.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
	375.0					\$ 2,397,162.32

Year 3						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	40.0	1.500	60.0	\$ 1,971.90	1.000	\$ 118,314.00
1-2	90.0	1.351	121.6	\$ 1,971.90	1.000	\$ 239,763.32
3	50.0	1.051	52.6	\$ 1,971.90	1.000	\$ 103,623.35

4-6	220.0	1.000	220.0	\$ 1,971.90	1.000	\$ 433,818.00
7-12	350.0	1.200	420.0	\$ 1,971.90	1.000	\$ 828,198.00
Economically Disadvantaged	500.0	0.250	125.0	\$ 1,971.90	1.000	\$ 246,487.50
ELL (Bilingual)	50.0	0.250	12.5	\$ 1,971.90	1.000	\$ 24,648.75
Gifted	50.0	0.340	17.0	\$ 1,971.90	1.000	\$ 33,522.30
SPED - Specific Learning Disability	50.0	0.400	20.0	\$ 1,971.90	1.000	\$ 39,438.00
SPED - Other Health Impairment	150.0	1.200	180.0	\$ 1,971.90	1.000	\$ 354,942.00
Weighted Salary Incentive Aid	0.0	0.000	1330.0	\$ 93.83	20.000	\$ 2,495,878.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
	750					\$ 4,918,633.22

Year 4						
Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	40.0	1.500	60.0	\$ 1,971.90	1.000	\$ 118,314.00
1-2	90.0	1.351	121.6	\$ 1,971.90	1.000	\$ 239,763.32
3	50.0	1.051	52.6	\$ 1,971.90	1.000	\$ 103,623.35
4-6	207.0	1.000	207.0	\$ 1,971.90	1.000	\$ 408,183.30
7-12	550.0	1.200	660.0	\$ 1,971.90	1.000	\$ 1,301,454.00
Economically Disadvantaged	625.0	0.250	156.3	\$ 1,971.90	1.000	\$ 308,109.38
ELL (Bilingual)	62.5	0.250	15.6	\$ 1,971.90	1.000	\$ 30,810.94
Gifted	75.0	0.340	25.5	\$ 1,971.90	1.000	\$ 50,283.45
SPED - Specific Learning Disability	75.0	0.400	30.0	\$ 1,971.90	1.000	\$ 59,157.00
SPED - Other Health Impairment	175.0	1.200	210.0	\$ 1,971.90	1.000	\$ 414,099.00
Weighted Salary Incentive Aid	0.0	0.000	1662.5	\$ 93.83	20.000	\$ 3,119,847.50
	0.0	0.000	0.0	\$ -	1.000	\$ -
	937.0					\$ 6,153,645.23

Year 5

Category (Grade Levels)	Student FTE	Program Costs Factors	Weighted Student ADM	Base Student Allocation	Adjustment Factor	Base Funding
K - Full Day	60.0	1.500	90.0	\$ 1,971.90	1.000	\$ 177,471.00
1-2	150.0	1.351	202.7	\$ 1,971.90	1.000	\$ 399,605.54
3	90.0	1.051	94.6	\$ 1,971.90	1.000	\$ 186,522.02
4-6	300.0	1.000	300.0	\$ 1,971.90	1.000	\$ 591,570.00
7-12	525.0	1.200	630.0	\$ 1,971.90	1.000	\$ 1,242,297.00
Economically Disadvantaged	750.0	0.250	187.5	\$ 1,971.90	1.000	\$ 369,731.25
ELL (Bilingual)	75.0	0.250	18.8	\$ 1,971.90	1.000	\$ 36,973.13
Gifted	150.0	0.340	51.0	\$ 1,971.90	1.000	\$ 100,566.90
SPED - Specific Learning Disability	100.0	0.400	40.0	\$ 1,971.90	1.000	\$ 78,876.00
SPED - Other Health Impairment	200.0	1.200	240.0	\$ 1,971.90	1.000	\$ 473,256.00
Weighted Salary Incentive Aid	0.0	0.000	1995.0	\$ 93.83	20.000	\$ 3,743,817.00
	0.0	0.000	0.0	\$ -	1.000	\$ -
	1125.0					\$ 7,400,685.83



St. Isidore of Seville Catholic Virtual School

Appendix H: Year 1 Arch OKC Start Up Fee Schedule

St. Isidore of Seville Catholic Virtual School FY2024-25 ARCH OKC Fee Schedule

The Archdiocese of Oklahoma City Department of Catholic Education is a non-profit entity. The fees below are estimates as to what it will take to get it off the ground and for general management. Only actual costs will be reimbursed. It is anticipated that the school will manage its own administration costs based on per pupil funding in 5-6 years with direction and oversight from the Board of Directors.

Description	Fee	Description
Curriculum & Materials, SISCVS System, and Instructional Support Services	\$1,300/pupil/yr -	Fee includes: Curriculum including Core, Elective, Career/Technical, and Advanced Placement (AP) Courses; Balanced assessment system; SISCVS System including SIS, LMS, in course email and schoolwide communication system; Web Conference technology integrated into SISCVS; Any online and physical textbooks/materials, with the exception of those for AP courses; Teacher Professional Development
Student Technology Assistance Services	\$150/pupil/yr -	Telephone, Live Chat, Web Form, Email access to Support Agents; Monitor help desk queues during support hours of 8:00 am – 8:00 pm EST/EDT; Multilingual English/Spanish support options; Support tickets will be addressed within the parameters of the SLA for that priority; Major incident management will assure effective communications of issue status and resolution; Coordination with secondary support teams (e.g. network operations, systems engineering) as required; Scheduled recurring onboarding webinars for new students to assist with school start; Management of self-help SISCVS support and resources website with access to online help documents and videos for parents/guardians/students
Enrollment Processing	\$100/pupil (gross new only) - upfront fee	Fee includes: Assisting parents/guardians of new students with the school enrollment process, including following up with lead inquiries to describe the school program offering and help families determine if the school is a good fit for their student; Collecting required compliancy documents for enrolling students;
Community Outreach, School Website	\$300/pupil/yr -	Fee includes: Development of marketing plan and implementation to meet desired enrollment targets; Management of school public website development and maintenance; School branding across both digital and print assets; Conducting school satisfaction surveys with enrolled families to share with local school teams; Management of school social media pages, including providing real-time support and responses to parent inquiries; Assist in promoting school events; Support collateral, design, and copy needs for school
Student and Faculty Technology	Student: \$425 per device; \$90/year/ per pupil T-Mobile Chromebook Go data plan fee for internet access; \$10.50/per pupil per year for Go Guardian Internet oversight management; \$8.50/per pupil for hotspot if needed in addition to the plan provided with the Chromebook. (75 budgeted) Faculty/Staff: Lenova Laptop, dock, monitor (25) \$2000/ea	Fee includes: Logistics, purchasing, warehousing, and fulfillment service for student device distribution; Set-up, configuration, and device provisioning; Shipment, maintenance, repair, reclamation and refurbishment for the life of the device; Software and virus protection for device, as needed. Student device oversight management (Go Guardian) https://www.t-mobile.com/hotspots-iot-connected-devices , 100 Hotspots available with demonstrated need.
Admin Payroll Processing	\$42.50 per employee per pay period	Fee includes: New hire data entry; Recruiting systems integration; Offer letter drafting and issuing; Coordination of new hire needs such as hardware and software; Employee qualification review; Systems integration with benefits vendors; Benefits plan audits; Administration of open enrollment; Processing of qualifying life events; Payroll system configuration; Biweekly data entry of payroll; Stipend processing; Physical check requests; Paycard issuance; Compliance audits for compensation, payroll, and benefits
School Operations Support Services	10% of Total Revenue,	Fee includes: Human Resource Generalist Support, School Leadership Support and Development, Accreditation Support; Academic Programming Guidance and Support; External Reporting Support, State Testing Support, Staff Technology Support, Special Education Support, Gifted Program Support, Homeless and Migrant Services Support, School Counseling and Family Support Programming Guidance, Accessibility Support, ELL Support, Additional recruiting fees if needed
School Business Support Services	1.5% of Total Revenue,	Fee includes: School Budgeting & Planning, Pupil Accounting, Federal Programs & Compliance Support, Student ISP Stipend Administration, Procurement, Audit Support (as needed), Insurance/Risk Management Support, Facility Support, Records Security and Management

Staff Training /PD (Teachers)	Student Technology Assistance Services	\$0	\$150,000	\$150,000	\$300,000	\$375,000	\$450,000	See attached price list for costs
	Student Computers & Software	\$0	\$309,825	\$100,450	\$190,700	\$235,825	\$255,000	See attached price list for costs (Assumption explanation below*)
		\$0	\$6,348	\$13,146	\$20,369	\$28,123	\$35,945	
Regular Instructional Program		\$0	\$1,278,673	\$1,076,096	\$2,872,484	\$3,785,962	\$4,681,437	
Special Ed Instructional Program	State Testing (Travel & Administration)	\$0	\$25,000	\$25,761	\$26,546	\$27,354	\$28,187	
	IEP Management Software	\$0	\$2,500	\$2,563	\$2,627	\$2,692	\$2,760	
	Alternative Curriculum	\$0	\$1,206	\$1,206	\$3,757	\$5,139	\$6,647	
	Assistive Technology	\$0	\$24,279	\$24,279	\$75,602	\$103,432	\$133,763	
	Special Education Direct Delivery Services	\$0	\$42,500	\$42,500	\$85,000	\$106,250	\$126,675	
Special Ed Instructional Program		\$0	\$95,485	\$96,309	\$193,532	\$244,867	\$298,032	
Total - Instructional Program Costs		\$0	\$2,461,123	\$2,279,773	\$5,353,723	\$6,883,192	\$8,590,189	

St. Isidore of Seville Catholic Virtual School - Base Budget

		Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Administrative Employee Related Costs								
Special Ed Admin Staff	Manager of Special Education	\$0	\$0	\$0	\$0	\$80,000	\$82,000	
	Special Education Coordinator	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	
	SPED Admin Benefits	\$0	\$20,700	\$21,218	\$21,748	\$49,892	\$51,139	
Administration Staff	Head of School	\$8,333	\$100,000	\$102,500	\$105,063	\$107,689	\$110,381	
	Principal(s)	\$0	\$0	\$0	\$85,000	\$87,125	\$89,303	
	CTE Coordinator	\$0	\$75,000	\$76,875	\$78,797	\$80,767	\$82,786	
	Student Services Coordinator	\$0	\$50,000	\$51,250	\$52,531	\$53,845	\$55,191	
	Registrar	\$0	\$22,500	\$22,500	\$22,500	\$22,500	\$49,672	
	Administrative Assistants	\$0	\$0	\$0	\$0	\$0	\$40,000	
	Operations Manager	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	
Full School Staff	Attendance/Testing Officer	\$0	\$0	\$0	\$0	\$0	\$42,000	
	Administration Staff Benefits	\$2,875	\$113,850	\$116,696	\$148,939	\$152,662	\$184,769	
	Bonus Allocation	\$0	\$44,097	\$77,688	\$114,843	\$151,960	\$189,917	
	Stipends	\$0	\$20,000	\$20,600	\$21,218	\$21,855	\$22,510	
Total -Administrative Employee Related Costs		\$11,208	\$366,147	\$612,327	\$776,715	\$937,521	\$1,132,126	

Business Services & Operations Cost

Support Services - Administration	School Treasurer	\$0	\$75,000	\$77,284	\$79,638	\$82,063	\$84,562	Independently contracted services
	Encumbrance Clerk	\$0	\$45,000	\$46,125	\$47,278	\$48,460	\$49,672	Independently contracted services
	Staff Recruiting	\$19,446	\$5,634	\$4,692	\$4,968	\$5,012	\$5,406	Approximately \$250 per new hire
	Legal Services	\$10,000	\$5,000	\$5,150	\$5,305	\$5,628	\$5,628	
	Insurance - D&O and Liability	\$10,000	\$36,000	\$37,096	\$38,226	\$39,390	\$40,590	
	Office Supplies	\$0	\$5,000	\$5,152	\$5,309	\$5,471	\$5,637	
	Office Postage	\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
	Copiers / Reproduction	\$0	\$4,000	\$4,122	\$4,247	\$4,377	\$4,510	
	Association Dues	\$0	\$2,000	\$2,061	\$2,124	\$2,188	\$2,255	
	Travel and Conferences (Admin Staff)	\$7,500	\$4,000	\$4,122	\$4,247	\$4,924	\$6,201	
	Board Related Expenses	\$0	\$10,000	\$10,305	\$10,618	\$10,942	\$11,275	
	Community Outreach and School Website	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
	Enrollment Processing Fee	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
	School Operations Support Services	\$0	\$255,925	\$268,806	\$569,222	\$688,197	\$825,504	See attached price list for costs
	School Business Support Services	\$0	\$48,394	\$96,528	\$144,411	\$191,904	\$239,722	See attached price list for costs
Charter Authorizer Fee		\$0	\$24,197	\$48,264	\$72,206	\$95,952	\$119,861	Assumes an oversight fee of 1% of revenue
Support Services - Administration		\$46,946	\$621,150	\$710,737	\$1,188,861	\$1,435,602	\$1,701,950	
Miscellaneous	External Audit	\$0	\$15,000	\$15,457	\$15,928	\$16,413	\$16,912	
	Admin Payroll Processing	\$0	\$22,986	\$22,986	\$64,347	\$86,699	\$111,317	See attached price list for costs (Assumption)
Banking Fees		\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
Business		\$0	\$38,986	\$59,299	\$81,337	\$104,205	\$129,357	
Pupil Health	Contracted Pupil Health Support	\$0	\$3,780	\$6,616	\$9,620	\$12,605	\$16,980	
Pupil Health		\$0	\$3,780	\$6,616	\$9,620	\$12,605	\$16,980	
Total Support Services		\$0	\$427,666	\$659,155	\$909,577	\$1,168,110	\$1,463,337	
Total - Business Services & Operations Costs		\$46,946	\$749,448	\$888,656	\$1,461,732	\$1,786,833	\$2,140,960	

St. Isidore of Seville Catholic Virtual School - Base Budget

	Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Facilities Cost							
Facilities & Maintenance Services	\$0	\$15000	15000	15000	15000	15000	Assumes a 1,500 sqft office @ \$10 per sqft for

<i>New Student Computer Fees</i>		53125	\$106,250	\$133,025	\$159,375	
<i>Faculty Laptops with applications- Lenova, with dock, monitor: 25</i>	50,000					
Total Device Cost	\$294,375	\$85,000.0	\$170,000	\$212,500	\$255,000	
Student Usage Device Management- Go Guardian. \$10.50/device	\$5,250	\$5,250.0	\$10,500	\$13,125	\$15,750	
100 Hot spots for additional internet access as needed \$8.50/mo or less- 25 for teachers/staff and 75 available for students	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200	
Total Technology costs for Student Devices	\$309,825	\$100,450	\$190,700	\$235,825	\$280,961	
Gross New Enrollments	500	500	1000	1250	1500	
Total Enrollment	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	

St. Isidore of Seville Catholic Virtual School

Appendix H: Start-Up and 5 Year Budget

St. Isidore of Seville Catholic Virtual School - Base Budget

		Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Funding - Enrollment Revenue								Arch OKC Fees are Highlighted in blue
Total Enrollment			500	500	1000	1250	1500	
FTE	FTE (Gen. ED) FTE (SPED)		425 75	425 75	800 200	1000 250	1200 300	Assumes 87% funded ADA Assumes 20% SPED population
State	State Aid Other - State Special Disbursements		2559253.00 \$0	2688057.01 \$0	5689222.16 \$0	66881976.35 \$0	\$8255041.08 \$0	
Total State			\$2,559,253	\$ 2,688,057.01	\$5,689,222	\$6,881,976	\$8,255,041	
Accel School Funding		\$0	\$0	\$0	\$0	\$0	\$0	
Total Local			\$0	\$0	\$0	\$0	\$0	
Total Revenue/Funding		\$0	\$2,559,253	\$2,688,057	\$5,689,222	\$6,881,976	\$8,255,041	
Instructional Employee Related Cost								
Regular Instructional Staff	Regular Education Teachers Salaries	\$0	\$630,000	\$645,750	\$1,323,788	\$1,646,663	\$2,088,937	Assumes 34.5% for taxes and benefit allocation Assumes annual salary increase of 2.5% per year
	Regular Education Teachers Benefits	\$0	\$217,350	\$217,350	\$434,700	\$543,375	\$720,683	
Special Ed/ELL Instructional Staff	ELL Teachers Salaries	\$0	\$46,668	\$46,671	\$119,004	\$142,340	\$192,570	
	Special Education Teachers Salaries	\$0	\$108,579	\$111,293	\$222,654	\$282,510	\$325,737	
	ELL & Special Education Teachers Benefits	\$0	\$37,460	\$38,396	\$76,816	\$97,466	\$112,379	
Support Staff	Success Coaches/Counselor Salaries	\$0	\$40,008	\$41,008	\$82,041	\$104,096	\$126,702	
	Support Staff Benefits	\$0	\$6,900	\$6,900	\$28,304	\$35,913	\$43,712	
Total - Instructional Employee Related Costs		\$0	\$1,086,965	\$1,197,368	\$2,287,307	\$2,852,363	\$3,610,720	
Instructional Program Costs								
General Ed Instructional Program	Student Testing and Assessment	\$0	\$75,000	\$75,000	\$238,913	\$328,252	\$422,811	Academic field trips and graduation activities for
	School Extracurricular Activities	\$0	\$37,500	\$37,500	\$119,457	\$164,126	\$211,406	
	Student Internet Access Hardware	\$0	\$50,000	\$50,000	\$53,045	\$54,636	\$56,275	
	Curriculum & Materials, SISCVS System, and Instructional Support Services	\$0	\$650,000	\$650,000	\$1,950,000	\$2,600,000	\$3,250,000	See attached price list for costs

Staff Training /PD (Teachers)	Student Technology Assistance Services	\$0	\$150,000	\$150,000	\$300,000	\$375,000	\$450,000	See attached price list for costs
	Student Computers & Software	\$0	\$309,825	\$100,450	\$190,700	\$235,825	\$255,000	See attached price list for costs (Assumption explanation below*)
		\$0	\$6,348	\$13,146	\$20,369	\$28,123	\$35,945	
Regular Instructional Program		\$0	\$1,278,673	\$1,076,096	\$2,872,484	\$3,785,962	\$4,681,437	
Special Ed Instructional Program	State Testing (Travel & Administration)	\$0	\$25,000	\$25,761	\$26,546	\$27,354	\$28,187	
	IEP Management Software	\$0	\$2,500	\$2,563	\$2,627	\$2,692	\$2,760	
	Alternative Curriculum	\$0	\$1,206	\$1,206	\$3,757	\$5,139	\$6,647	
	Assistive Technology	\$0	\$24,279	\$24,279	\$75,602	\$103,432	\$133,763	
	Special Education Direct Delivery Services	\$0	\$42,500	\$42,500	\$85,000	\$106,250	\$126,675	
Special Ed Instructional Program		\$0	\$95,485	\$96,309	\$193,532	\$244,967	\$299,032	
Total - Instructional Program Costs		\$0	\$2,461,123	\$2,279,773	\$5,353,323	\$6,893,192	\$8,590,189	

St. Isidore of Seville Catholic Virtual School - Base Budget

		Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Administrative Employee Related Costs								
Special Ed Admin Staff	Manager of Special Education	\$0	\$0	\$0	\$0	\$80,000	\$82,000	
	Special Education Coordinator	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	
	SPED Admin Benefits	\$0	\$20,700	\$21,218	\$21,748	\$49,892	\$51,139	
Administration Staff	Head of School	\$8,333	\$100,000	\$102,500	\$105,063	\$107,689	\$110,381	
	Principal(s)	\$0	\$0	\$0	\$85,000	\$87,125	\$89,303	
	CTE Coordinator	\$0	\$75,000	\$76,875	\$78,797	\$80,767	\$82,786	
	Student Services Coordinator	\$0	\$50,000	\$51,250	\$52,531	\$53,845	\$55,191	
	Registrar	\$0	\$22,500	\$22,500	\$22,500	\$22,500	\$49,672	
	Administrative Assistants	\$0	\$0	\$0	\$0	\$0	\$40,000	
	Operations Manager	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	
Full School Staff	Attendance/Testing Officer	\$0	\$0	\$0	\$0	\$0	\$42,000	
	Administration Staff Benefits	\$2,875	\$113,850	\$116,696	\$148,939	\$152,662	\$184,769	
	Bonus Allocation	\$0	\$44,097	\$77,688	\$114,843	\$151,960	\$189,917	
	Stipends	\$0	\$20,000	\$20,600	\$21,218	\$21,855	\$22,510	
Total -Administrative Employee Related Costs		\$11,208	\$566,147	\$612,327	\$776,715	\$937,521	\$1,132,126	

Business Services & Operations Cost

Support Services - Administration	School Treasurer	\$0	\$75,000	\$77,284	\$79,638	\$82,063	\$84,562	Independently contracted services
	Encumbrance Clerk	\$0	\$45,000	\$46,125	\$47,278	\$48,460	\$49,672	Independently contracted services
	Staff Recruiting	\$19,446	\$5,634	\$4,692	\$4,968	\$5,012	\$5,406	Approximately \$250 per new hire
	Legal Services	\$10,000	\$5,000	\$5,150	\$5,305	\$5,628	\$5,628	
	Insurance - D&O and Liability	\$10,000	\$36,000	\$37,096	\$38,226	\$39,390	\$40,590	
	Office Supplies	\$0	\$5,000	\$5,152	\$5,309	\$5,471	\$5,637	
	Office Postage	\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
	Copiers / Reproduction	\$0	\$4,000	\$4,122	\$4,247	\$4,377	\$4,510	
	Association Dues	\$0	\$2,000	\$2,061	\$2,124	\$2,188	\$2,255	
	Travel and Conferences (Admin Staff)	\$7,500	\$4,000	\$4,122	\$4,247	\$4,924	\$6,201	
	Board Related Expenses	\$0	\$10,000	\$10,305	\$10,618	\$10,942	\$11,275	
	Community Outreach and School Website	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
	Enrollment Processing Fee	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
	School Operations Support Services	\$0	\$255,925	\$268,806	\$569,222	\$688,197	\$825,504	See attached price list for costs
	School Business Support Services	\$0	\$48,394	\$96,528	\$144,411	\$191,904	\$239,722	See attached price list for costs
Charter Authorizer Fee		\$0	\$24,197	\$48,264	\$72,206	\$95,952	\$119,861	Assumes an oversight fee of 1% of revenue
Support Services - Administration		\$46,946	\$621,150	\$710,737	\$1,188,861	\$1,435,602	\$1,701,950	
Miscellaneous	External Audit	\$0	\$15,000	\$15,457	\$15,928	\$16,413	\$16,912	
	Admin Payroll Processing	\$0	\$22,986	\$22,986	\$64,347	\$86,699	\$111,317	See attached price list for costs (Assumption)
Banking Fees		\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
Business		\$0	\$38,986	\$59,299	\$81,337	\$104,205	\$129,357	
Pupil Health	Contracted Pupil Health Support	\$0	\$3,780	\$6,616	\$9,620	\$12,605	\$16,980	
Pupil Health		\$0	\$3,780	\$6,616	\$9,620	\$12,605	\$16,980	
Total Support Services		\$0	\$427,66	\$659,15	\$909,57	\$1168,10	\$1463,37	
Total - Business Services & Operations Costs		\$46,946	\$749,448	\$888,656	\$1,461,732	\$1,786,033	\$2,140,960	

St. Isidore of Seville Catholic Virtual School - Base Budget

	Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Facilities Cost							
Facilities & Maintenance Services							
	\$0	\$15000	15000	15000	15000	15000	Assumes a 1,500 sqft office @ \$10 per sqft for

Office Rent Office Utilities	\$0	\$6,000	\$6,183	\$6,371	\$6,565	\$6,765	
Maintenance and Repair	\$0	\$3,750	\$3,864	\$3,982	\$4,103	\$4,228	
High Speed Internet & Telephone	\$0	\$5,000	\$5,152	\$5,309	\$5,471	\$5,637	
In Person Covid-19 Health Measures Furniture	\$0	\$2,500	\$2,576	\$2,655	\$2,735	\$2,819	
Fixtures and Equipment	\$0	\$5,000	\$2,576	\$2,655	\$2,735	\$2,819	
Total - Facilities Costs	\$0	\$52,250	\$51,251	\$52,798	\$54,392	\$56,033	
Debt Service / Other Expenditures Interest	\$0	\$0	\$0	\$0	\$0	\$0	
Principal	\$0	\$0	\$0	\$0	\$0	\$0	
Debt Service / Other Expenditures	\$0	\$0	\$0	\$0	\$0	\$0	
Total Gross Expenses	\$58,155	\$3,828,968	\$3,832,007	\$7,644,568	\$9,661,138	\$11,919,308	
<i>Arch OKC Invoice Credit</i>	-\$58,155	-\$1,514,144	-\$1,365,784	-\$3,354,333	-\$4,340,926	-\$5,320,226	<i>Credits for Fees to balance school budget</i>
Total Net Expenses	\$0	\$2,314,824	\$2,466,223	\$4,290,235	\$5,320,212	\$6,599,082	
Surplus (Deficit)	\$0	\$244,429	\$221,834	\$1,398,987	\$1,561,765	\$1,655,959	
Surplus (Deficit) %	0%	1.0%	1.0%	1.0%	1.0%	1.0%	
Fund Balance	\$0	\$217,350	\$217,350	\$434,700	\$543,375	\$720,683	
Fund Balance	0%	1.0%	1.0%	2.0%	2.5%	3.0%	

*The Computer Fee of \$425 per enrollment applies to every new enrollment. Additionally, student churn of 15% is taken into account, so the Computer Fee also applies to in-year backfill enrollments. Returning students are not charged the Computer Fee.

**The Enrollment Processing Fee of \$100 per enrollment applies to new enrollments and based on net new enrollments only. See attachment for calculation support for both fees above.

Additional Detail on Computer Fee Calculation

Enrollments	500	500	1000	1250	1500	
Fee Per Computer, Chromebook Go includes data plan with T-Mobile, AT&T, Verizon-2 year contracts	425	425	425	425	425	
<i>Gross Computer Fees</i>	212500	0	0	0	0	
Churn Rate	15%	15%	15%	15%	15%	
Churn Count	75	75	150	187	225	
<i>Churn Computer Fees</i>	31875	31875	63750	79475	95625	
Retention Rate	75%	75%	75%	75%	75%	
Prior Year Retained Students	0	375	750	937	1125	
New Students	0	125	250	313	375	

<i>New Student Computer Fees</i>		53125	\$106,250	\$133,025	\$159,375	
<i>Faculty Laptops with applications- Lenova, with dock, monitor: 25</i>	50,000					
Total Device Cost	\$294,375	\$85,000.0	\$170,000	\$212,500	\$255,000	
Student Usage Device Management- Go Guardian. \$10.50/device	\$5,250	\$5,250.0	\$10,500	\$13,125	\$15,750	
100 Hot spots for additional internet access as needed \$8.50/mo or less- 25 for teachers/staff and 75 available for students	\$10,200	\$10,200	\$10,200	\$10,200	\$10,200	
Total Technology costs for Student Devices	\$309,825	\$100,450	\$190,700	\$235,825	\$280,961	
Gross New Enrollments	500	500	1000	1250	1500	
Total Enrollment	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	

St. Isidore of Seville Catholic Virtual School

Appendix H: Start-Up and 5 Year Budget- 75%

St. Isidore of Seville Catholic Virtual School - Base Budget

		Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Funding - Enrollment Revenue								
								<i>Arch OKC Fees are Highlighted in blue</i>
Total Enrollment			375	375	750	937	1125	
FTE	FTE (Gen. ED) FTE (SPED)		300 75	300 75	563 187	1000 250	1200 300	Assumes 87% funded ADA Assumes 20% SPED population
State	State Aid Other - State Special Disbursements		\$2,393,810.09	2397162.32	4918633.22	6153645.23	7400685.83	
Total State			\$2,393,810.09	2397162.32	4918633.22	6153645.23	7400685.83	
Accel School Funding		\$0	\$0	\$0	\$0	\$0	\$0	
Total Local			\$0	\$0	\$0	\$0	\$0	
Total Revenue (Funding)		\$0	\$2,393,810.09	2397162.32	4918633.22	6153645.23	7400685.83	
Instructional Employee Related Cost								
Regular Instructional Staff	Regular Education Teachers Salaries	\$0	\$390,000	\$390,000	\$670,950	\$865,960	\$957,124	
	Regular Education Teachers Benefits	\$0	\$134,550	\$134,550	\$231,478	\$298,756	\$333,658	Assumes 34.5% for taxes and benefit allocation Assumes annual salary increase of 2.5% per year
Special Ed/ELL Instructional Staff	ELL Teachers Salaries	\$0	\$46,668	\$46,671	\$119,004	\$142,340	\$192,570	
	Special Education Teachers Salaries	\$0	\$108,579	\$111,293	\$222,654	\$282,510	\$325,737	
	ELL & Special Education Teachers Benefits	\$0	\$37,460	\$38,396	\$76,816	\$97,466	\$112,379	
Support Staff	Success Coaches/Counselor Salaries	\$0	\$40,008	\$41,008	\$82,041	\$104,096	\$126,702	
	Support Staff Benefits	\$0	\$6,900	\$6,900	\$28,304	\$35,913	\$43,712	
Total - Instructional Employee Related Costs		\$0	\$764,165	\$768,818	\$1,431,248	\$1,827,041	\$2,091,882	
Instructional Program Costs								
General Ed Instructional Program	Student Testing and Assessment	\$0	\$60,000	\$60,000	\$100,469	\$328,252	\$143,348	
	School Extracurricular Activities	\$0	\$30,000	\$30,000	\$50,235	\$164,126	\$94,373	Academic field trips and graduation activities for
	Student Internet Access Hardware	\$0	\$40,000	\$40,000	\$41,200	\$54,636	\$43,709	
	Curriculum & Materials, SISCVS System, and Instructional Support Services	\$0	\$487,500	\$487,500	\$845,000	\$2,600,000	\$1,950,000	See attached price list for costs

Staff Training /PD (Teachers)	Student Technology Assistance Services	\$0	\$112,500	\$112,500	\$225,000	\$281,100	\$337,500	See attached price list for costs See attached price list for costs (Assumption explanation below*)
	Student Computers & Software	\$0	\$247,313	\$91,063	\$172,350	\$212,999	\$253,213	
		\$0	\$6,348	\$6,348	\$20,369	\$28,123	\$35,945	
Regular Instructional Program		\$0	\$983,661	\$827,411	\$1,454,623	\$3,669,336	\$2,858,898	
Special Ed Instructional Program	State Testing (Travel & Administration)	\$0	\$25,000	\$25,761	\$26,546	\$27,354	\$28,187	
	IEP Management Software	\$0	\$2,500	\$2,563	\$2,627	\$2,692	\$2,760	
	Alternative Curriculum	\$0	\$1,206	\$1,206	\$3,757	\$5,139	\$6,647	
	Assistive Technology	\$0	\$24,279	\$24,279	\$75,602	\$103,432	\$133,763	
	Special Education Direct Delivery Services	\$0	\$42,500	\$42,500	\$85,000	\$106,250	\$126,675	
Special Ed Instructional Program		\$0	\$95,485	\$96,309	\$193,532	\$244,867	\$298,032	
Total - Instructional Program Costs		\$0	\$1,843,311	\$1,692,538	\$3,873,403	\$5,741,144	\$5,248,002	

St. Isidore of Seville Catholic Virtual School - Base Budget								
		Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Administrative Employee Related Costs								
Special Ed Admin Staff	Manager of Special Education	\$0	\$0	\$0	\$0	\$80,000	\$82,000	
	Special Education Coordinator	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	
	SPED Admin Benefits	\$0	\$20,700	\$21,218	\$21,748	\$49,892	\$51,139	
Administration Staff	Head of School	\$8,333	\$100,000	\$102,500	\$105,063	\$107,689	\$110,381	
	Principal(s)	\$0	\$0	\$0	\$85,000	\$87,125	\$89,303	
	CTE Coordinator	\$0	\$75,000	\$76,875	\$78,797	\$80,767	\$82,786	
	Student Services Coordinator	\$0	\$50,000	\$51,250	\$52,531	\$53,845	\$55,191	
	Registrar	\$0	\$22,500	\$22,500	\$22,500	\$22,500	\$49,672	
	Administrative Assistants	\$0	\$0	\$0	\$0	\$0	\$40,000	
	Operations Manager	\$0	\$60,000	\$61,500	\$63,038	\$64,613	\$66,229	
	Attendance/Testing Officer	\$0	\$0	\$0	\$0	\$0	\$42,000	
Full School Staff	Administration Staff Benefits	\$2,875	\$113,850	\$116,696	\$148,939	\$152,662	\$184,769	
	Bonus Allocation	\$0	\$44,097	\$44,097	\$114,843	\$151,960	\$189,917	
	Stipends	\$0	\$20,000	\$20,600	\$21,218	\$21,855	\$22,510	
Total -Administrative Employee Related Costs		\$11,208	\$566,147	\$578,736	\$776,715	\$937,521	\$1,132,126	

Business Services & Operations Cost								
Support Services - Administration	School Treasurer	\$0	\$75,000	\$77,284	\$79,638	\$82,063	\$84,562	Independently contracted services
	Encumbrance Clerk	\$0	\$45,000	\$46,125	\$47,278	\$48,460	\$49,672	Independently contracted services
	Staff Recruiting	\$19,446	\$5,634	\$4,692	\$4,968	\$5,012	\$5,406	Approximately \$250 per new hire
	Legal Services	\$10,000	\$5,000	\$5,150	\$5,305	\$5,628	\$5,628	
	Insurance - D&O and Liability	\$10,000	\$36,000	\$37,096	\$38,226	\$39,390	\$40,590	
	Office Supplies	\$0	\$5,000	\$5,152	\$5,309	\$5,471	\$5,637	
	Office Postage	\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
	Copiers / Reproduction	\$0	\$4,000	\$4,122	\$4,247	\$4,377	\$4,510	
	Association Dues	\$0	\$2,000	\$2,061	\$2,124	\$2,188	\$2,255	
	Travel and Conferences (Admin Staff)	\$7,500	\$4,000	\$4,122	\$4,247	\$4,924	\$6,201	
	Board Related Expenses	\$0	\$10,000	\$10,305	\$10,618	\$10,942	\$11,275	
	Community Outreach and School Website	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
	Enrollment Processing Fee	\$0	\$50,000	\$50,000	\$100,000	\$125,000	\$150,000	See attached price list for costs
	School Operations Support Services	\$0	\$239,381	\$239,716	\$491,863	\$615,364	\$740,068	See attached price list for costs
	School Business Support Services	\$0	\$48,394	\$96,528	\$144,411	\$191,904	\$239,722	See attached price list for costs
Charter Authorizer Fee	\$0	\$24,197	\$48,264	\$72,206	\$95,952	\$119,861	Assumes an oversight fee of 1% of revenue	
Support Services - Administration		\$46,946	\$604,606	\$681,647	\$1,111,502	\$1,362,769	\$1,616,514	
Miscellaneous	External Audit	\$0	\$15,000	\$15,457	\$15,928	\$16,413	\$16,912	See attached price list for costs (Assumption)
	Admin Payroll Processing	\$0	\$22,986	\$22,986	\$64,347	\$86,699	\$111,317	
Banking Fees		\$0	\$1,000	\$1,030	\$1,062	\$1,094	\$1,127	
Business		\$0	\$38,986	\$59,299	\$81,337	\$104,205	\$129,357	
Pupil Health	Contracted Pupil Health Support	\$0	\$3,780	\$6,616	\$9,620	\$12,605	\$16,980	
Pupil Health		\$0	\$3,780	\$6,616	\$9,620	\$12,605	\$16,980	
Total Support Services		\$0	\$427,666	\$659,155	\$909,577	\$1,168,110	\$1,463,377	
Total - Business Services & Operations Costs		\$46,946	\$732,904	\$859,566	\$1,284,373	\$1,713,200	\$2,055,524	

St. Isidore of Seville Catholic Virtual School - Base Budget

	Start-up	FY2024	FY2025	FY2026	FY2027	FY2028	Assumptions
Facilities Cost							

Facilities & Maintenance Services	\$0	\$15000	15000	15000	15000	15000	Assumes a 1,500 sqft office @ \$10 per sqft for
Office Rent Office Utilities	\$0	\$6,000	\$6,183	\$6,371	\$6,565	\$6,765	
Maintenance and Repair	\$0	\$3,750	\$3,864	\$3,982	\$4,103	\$4,228	
High Speed Internet & Telephone	\$0	\$5,000	\$5,152	\$5,309	\$5,471	\$5,637	
In Person Covid-19 Health Measures Furniture	\$0	\$2,500	\$2,576	\$2,655	\$2,735	\$2,819	
Fixtures and Equipment	\$0	\$5,000	\$2,576	\$2,655	\$2,735	\$2,819	
Total - Facilities Costs	\$0	\$52,250	\$51,251	\$52,798	\$54,392	\$56,033	
Debt Service / Other Expenditures Interest	\$0	\$0	\$0	\$0	\$0	\$0	
Principal	\$0	\$0	\$0	\$0	\$0	\$0	
Debt Service / Other Expenditures	\$0	\$0	\$0	\$0	\$0	\$0	
Total Gross Expenses	\$58,155	\$3,194,612	\$3,182,091	\$5,293,289	\$8,446,257	\$8,491,685	
<i>Arch OKC Invoice Credit</i>	<i>-\$58,155</i>	<i>-\$1,235,088</i>	<i>-\$1,127,307</i>	<i>-\$2,078,624</i>	<i>-\$4,151,367</i>	<i>-\$3,820,503</i>	<i>Credits for Fees to balance school budget</i>
Total Net Expenses	\$0	\$1,959,524	\$2,054,784	\$3,214,665	\$4,294,890	\$4,671,182	
Surplus (Deficit)	\$0	\$434,286	\$342,378	\$1,703,969	\$1,858,755	\$2,729,504	
Surplus (Deficit) %	0%	1.0%	1.0%	1.0%	1.0%	1.0%	
Fund Balance	\$0	\$134,550	\$134,550	\$231,478	\$298,756	\$333,658	
Fund Balance	0%	1.0%	1.0%	2.0%	2.5%	3.0%	

*The Computer Fee of \$425 per enrollment applies to every new enrollment. Additionally, student churn of 15% is taken into account, so the Computer Fee also applies to in-year backfill enrollments. Returning students are not charged the Computer Fee.

**The Enrollment Processing Fee of \$100 per enrollment applies to new enrollments and based on net new enrollments only. See attachment for calculation support for both fees above.

Additional Detail on Computer Fee Calculation

Enrollments	375	375	750	937	1125	
Fee Per Computer, Chromebook Go includes data plan with T-Mobile, AT&T, Verizon-2 year contracts	425	425	425	425	425	
<i>Gross Computer Fees</i>	<i>\$159,375</i>	<i>\$0</i>	<i>\$0</i>	<i>\$0</i>	<i>\$0</i>	
Churn Rate	15%	15%	15%	15%	15%	
Churn Count	56	56	113	141	169	
<i>Churn Computer Fees</i>	<i>\$23,800</i>	<i>\$23,800</i>	<i>\$48,025</i>	<i>\$59,925</i>	<i>\$71,825</i>	
Retention Rate	75%	75%	75%	75%	75%	
Prior Year Retained Students	0	375	750	937	1125	

New Students	0	125	250	313	375	
<i>New Student Computer Fees</i>	0	\$53,125.00	\$106,250	\$133,025	\$159,375	
<i>Faculty Laptop Fees with system</i>	\$50,000.00	0	\$0	\$0	\$0	
Total Computer Fees	\$233,175	\$76,925.0	\$154,275	\$192,950	\$231,200	
Student Usage Device Management- Go Guardian. \$10.50/device	\$3,938	\$3,938	\$7,875	\$9,849	\$11,813	
100 Hot spots for additional internet access as needed \$8.50/mo or less	\$10, 200	\$10,200	\$10,200	\$10, 200	\$10, 200	
Total Technology costs for Student Devices	\$247,313	\$91,063	\$172,350	\$212,999	\$253,213	
Total Enrollment	\$37,500	\$37,500	\$75,000	\$9,370	\$11,250	

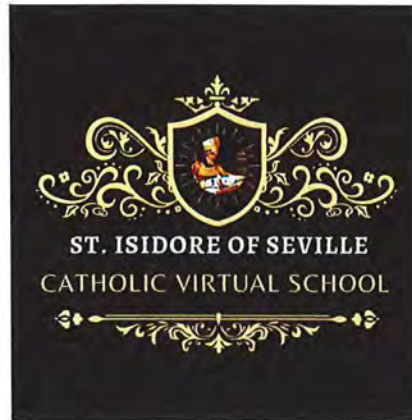


		July	August	September	October	November	December	January	February	March	April	May	June	FY2024	
State	State Aid	-	232,659	232,659	232,659	232,659	232,659	232,659	232,659	232,659	232,659	232,659	232,659	\$2,559,253	
	SPED	-	-	-	-	-	-	-	-	-	-	-	-	\$0	
	ELL	-	-	-	-	-	-	-	-	-	-	-	-	\$0	
	CTE	-	-	-	-	-	-	-	-	-	-	-	-	\$0	
	Other	-	-	-	-	-	-	-	-	-	-	-	-	\$0	
Total State		\$0	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$2,559,253	
Total Federal		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Total Local		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	
Total Revenue		\$0	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$2,559,253	
Regular Instructional Staff	Regular Education Teachers Salaries	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	\$2500.00	630000	
	Regular Education Teachers Benefits	13990.00	13990.00	13990.00	13990.00	13990.00	13990.00	13990.00	13990.00	13990.00	13990.00	13990.00	13990.00	167880	
Special Ed Instructional Staff	ELL Teachers Salaries	3889.00	3889.00	3889.00	3889.00	3889.00	3889.00	3889.00	3889.00	3889.00	3889.00	3889.00	3889.00	46668	
	Special Education Teachers Salaries	9048.00	9048.00	9048.00	9048.00	9048.00	9048.00	9048.00	9048.00	9048.00	9048.00	9048.00	9048.00	108576	
	ELL & Special Education Teachers Benefits	4463.00	4463.00	4463.00	4463.00	4463.00	4463.00	4463.00	4463.00	4463.00	4463.00	4463.00	4463.00	53556	
Support Staff	Advisor/Counselor Salaries	3334.00	3334.00	3334.00	3334.00	3334.00	3334.00	3334.00	3334.00	3334.00	3334.00	3334.00	3334.00	40008	
	Support Staff Benefits	575.00	575.00	575.00	575.00	575.00	575.00	575.00	575.00	575.00	575.00	575.00	575.00	6900	
Total Employment Costs		\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$87,799	\$1,053,588	
Regular Instructional Program															
	Parent & Student Activities Program Exp	-	-	-	-	-	-	-	-	-	-	-	-	\$0	
	Student Testing and Assessment	-	-	-	-	18,750	-	-	-	18,750	18,750	18,750	-	\$75,000	
	Extracurricular Activities	\$3,125	3,125	3,125	3,125	3,125	3,125	3,125	3,125	3,125	3,125	3,125	3,125	\$37,500	
	Student Printers	-	-	-	-	-	-	-	-	-	-	-	-	\$0	
	Student Internet Access Hardware	\$4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	\$50,004	
	Curriculum & Materials, SISCVS System, and Instructional Support Services	-	-	32,500	32,500	32,500				32,500		32,500		487,500	\$650,000
	Student Technology Assistance Services	\$5,375	5375	5,375	5,375	5,375	5375	5375	5,375	5375	5,375	5375	90,875	\$150,000	
	Student Computers & Software	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$25,819	\$309,825	
Staff Training /PD (Teachers)		\$529	529	529	529	529	529	529	529	529	529	529	529	\$6,348	
Regular Instructional Program		\$39,015	\$39,015	\$71,515	\$71,515	\$90,265	\$39,015	\$39,015	\$71,515	\$57,765	\$90,265	\$57,765	\$612,015	\$1,278,677	
Special Ed Instructional Program															
	State Testing (Travel & Administration)	-	-	-	-	6,250	-	-	-	6,250	6,250	6,250	-	\$25,000	

	IEP Management Software	-	2,500	-	-	-	-	-	-	-	-	-	-	\$2,500
	Alternative Curriculum	-	-	603	-	-	-	-	603	-	-	-	-	\$1,206
	Assistive Technology	-	-	12,140	-	-	-	-	12,140	-	-	-	-	\$24,279
	Special Education Direct Services	-	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	4,223	-	\$42,225
Special Ed Instructional Program		\$0	\$6,723	\$16,966	\$4,223	\$10,473	\$4,223	\$4,223	\$16,966	\$10,473	\$10,473	\$10,473	\$0	\$95,210
Special Ed Admin Staff														
	Manager(s) of Special Education	-	-	-	-	-	-	-	-	-	-	-	-	\$0
	Coordinator of Special Education	-	-	-	-	-	-	-	-	-	-	-	-	\$0
	Special Education Registrar	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$22,500
	SPED Admin Benis	\$1,725	1,725	1,725	1,725	1,725	1,725	1,725	1,725	1,725	1,725	1,725	1,725	\$20,700
Administration Staff	Principal	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$7,083	\$85,000
	Asst. Principal	-	-	-	-	-	-	-	-	-	-	-	-	\$0
	CTE Coordinator	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$3,125	\$37,500
	Encumbrance Clerk	\$3,750	3,750	3,750	3,750	3,750	3,750	3,750	3,750	3,750	3,750	3,750	3,750	\$45,000
	Student Services Coordinator	\$4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	4,167	\$50,004
	Registrar	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$1,875	\$22,500
	Administrative Assistants	-	-	-	-	-	-	-	-	-	-	-	-	\$0
	Operations Manager	\$5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	\$60,000
	Attendance/Testing Officer	-	-	-	-	-	-	-	-	-	-	-	-	\$0
	Administration Staff Benefits	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$3,750	\$45,000
Full School Staff	Bonus Allocation	-	-	-	-	-	-	-	-	-	-	-	44,097	\$44,097
	Stipends	\$1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	1,667	\$20,000
Total Employment Costs		\$34,017	\$34,017	\$34,017	\$34,017	\$34,017	\$34,017	\$34,017	\$34,017	\$34,017	\$34,017	\$34,017	\$78,114	\$452,301
St. Isidore of Seville Catholic Virtual School - Base Budget Cash Flow														

		July	August	September	October	November	December	January	February	March	April	May	June	FY2023
Support Services - Administration														
	School Treasurer	\$6,250	6,250	6,250	6,250	6,250	6,250	6,250	6,250	6,250	6,250	6,250	6,250	\$75,000
	Staff Recruiting	\$469	\$469	\$469	\$469	\$469	\$469	\$469	\$469	\$469	\$469	\$469	\$469	\$5,628
	Legal Services	\$417	417	417	417	417	417	417	417	417	417	417	417	\$5,004
	D&O Insurance	\$3,000	3,000	3,000	3,000	3,000	3,000	3,000	3,000	3,000	3,000	3,000	3,000	\$36,000
	General Liability Insurance	\$417	417	417	417	417	417	417	417	417	417	417	417	\$5,004
	Office Supplies	\$83	83	83	83	83	83	83	83	83	83	83	87	\$1,000
	Office Postage	\$333	333	333	333	333	333	333	333	333	333	333	337	\$4,000
	Copiers / Reproduction	\$167	167	167	167	167	167	167	167	166	166	166	166	\$2,000
	Dues	\$333	333	333	333	333	333	333	333	333	333	333	337	\$4,000
	Board Related Expenses	\$833	833	833	833	833	833	833	833	833	833	833	837	\$10,000
	Community Outreach and School Website	-	-	7,500	7,500	7,500	-	-	7,500	-	7,500	-	12,500	\$50,000
	Enrollment Processing Fee	-	-	2,500	2,500	2,500	-	-	2,500	-	2,500	-	37,500	\$50,000
	School Operations Support Services	-	-	12,500	12,500	12,500	-	-	12,500	-	12,500	-	193,425	\$255,925

	School Business Support Services	-	-	2,500	2,500	2,500	-	-	2,500	-	2,500	-	25,889	\$38,389
Oversight/Sponsor Fee		\$2,016	2,016	2,016	2,016	2,016	2,016	2,016	2,016	2,016	2,016	2,016	2,016	\$24,192
Support Services - Administration		\$14,318	\$14,318	\$39,318	\$39,318	\$39,318	\$14,318	\$14,318	\$39,318	\$14,317	\$39,317	\$14,317	\$283,647	\$566,142
Business	External Audit						15,000							\$15,000
	Payroll Processing Fees	\$1,916	1,916	1,916	1,916	1,916	1,916	1,916	1,916	1,916	1,916	1,916	1,916	\$22,986
	Banking Fees	\$83	83	83	83	83	83	83	83	83	83	83	83	\$1,000
Business		\$1,999	\$1,999	\$1,999	\$1,999	\$1,999	\$16,999	\$1,999	\$1,999	\$1,999	\$1,999	\$1,999	\$1,999	\$38,986
Pupil Health	Contracted Pupil Health Support	-	378	378	378	378	378	378	378	378	378	378	-	\$3,780
Pupil Health		\$0	\$378	\$378	\$378	\$378	\$378	\$378	\$378	\$378	\$378	\$378	\$0	\$3780
Facilities & Maintenance Services	Office Rent	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$1,250	\$15,000
	Office Utilities	\$500	500	500	500	500	500	500	500	500	500	500	500	\$6,000
	Maintenance and Repair	\$313	313	313	313	313	313	313	313	313	313	313	313	\$3,756
	High Speed Internet & Telephone for staff	\$417	417	417	417	417	417	417	417	417	417	417	413	\$5,000
	In Person Health Measures	\$208	208	208	208	208	208	208	208	208	208	208	212	\$2,500
	Furniture, Fixtures and Equipment	\$417	417	417	417	417	417	417	417	417	417	417	413	\$5,000
Facilities & Maintenance Services		\$3,105	\$3,105	\$3,105	\$3,105	\$3,105	\$3,105	\$3,105	\$3,105	\$3,105	\$3,105	\$3,105	\$3,101	\$37,256
Debt Service / Other Expenditures	Interest	-	-	-	-	-	-	-	-	-	-	-	-	\$0
	Principal	-	-	-	-	-	-	-	-	-	-	-	-	\$0
Debt Service / Other Expenditures		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Expenses		\$180,253	\$187,354	\$255,097	\$242,354	\$267,354	\$199,854	\$184,854	\$255,097	\$209,853	\$267,353	\$209,853	\$1,066,675	\$3,562,871
Arch OKC Invoice Credit		\$169,424.00	\$(20,365.00)	\$(81,615.00)	\$(81,615.00)	\$(81,615.00)	-	-	\$(81,615.00)		\$(81,615.00)		\$(833,429)	~\$2,259,836
Net Expenses		\$0	\$166,989	\$173,482	\$160,739	\$185,739	\$199,854	\$184,854	\$173,482	\$209,853	\$185,738	\$209,853	\$233,246	\$1,303,035
Total Revenue		\$0	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,659	\$232,663	\$2,559,253
Net Expenses		\$0	\$162,822	\$169,315	\$156,572	\$181,572	\$195,687	\$180,687	\$169,315	\$205,686	\$181,571	\$205,686	\$229,080	\$1,466,265
Cash Balance		\$0	\$73,754	\$63,344	\$76,087	\$51,087	\$36,972	\$51,972	\$63,344	\$26,973	\$51,088	\$26,973	\$3,583	\$1,092,988



Section 13: Appendix I: Archdiocese of Oklahoma City Letter of Support



Go Make Disciples

FINANCE

ARCHDIOCESE OF OKLAHOMA CITY

January 26, 2023

Dear St. Isidore of Seville Catholic Virtual School Board of Trustees,

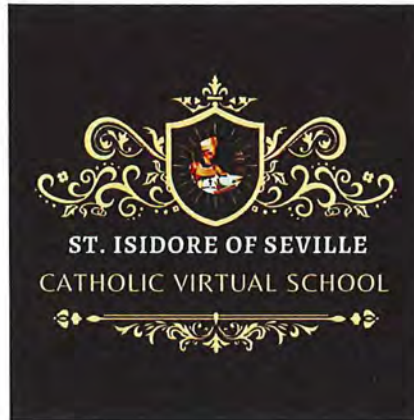
We look forward to St. Isidore of Seville Catholic Virtual School's application being granted and formalizing our partnership. Please consider this letter a commitment from the Archdiocese of Oklahoma City to perform the following:

- Provide state and federal grant writing support to pursue and secure charter school grant funds to cover the School's start-up costs.

We assure you and your authorizer that the School will have sufficient funds to launch and start operations before beginning to receive state and federal funding per enrolled student.

Warmest Regards,

David Johnson
Chief Financial Officer
Archdiocese of Oklahoma City



Section 13: Appendix J: OCCSAA/ OPSAC Accreditation

Oklahoma Private School Accreditation Commission

Approved Accrediting Association

*Oklahoma Conference of Catholic Schools
Accrediting Association*

This accreditation body is recognized as a valid accrediting agency for private schools in the state of Oklahoma by the Oklahoma Private School Accreditation Commission, as authorized by the Oklahoma State Department of Education as is entitled to the rights and privileges associated with this recognition.

Effective 2016-2026

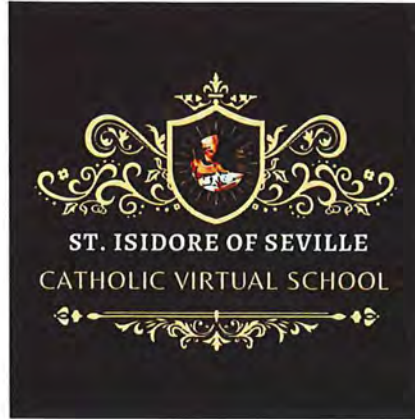


CHAIRMAN
JOHN S. CRAIG



EXECUTIVE DIRECTOR
DR. DONNIE PEAL

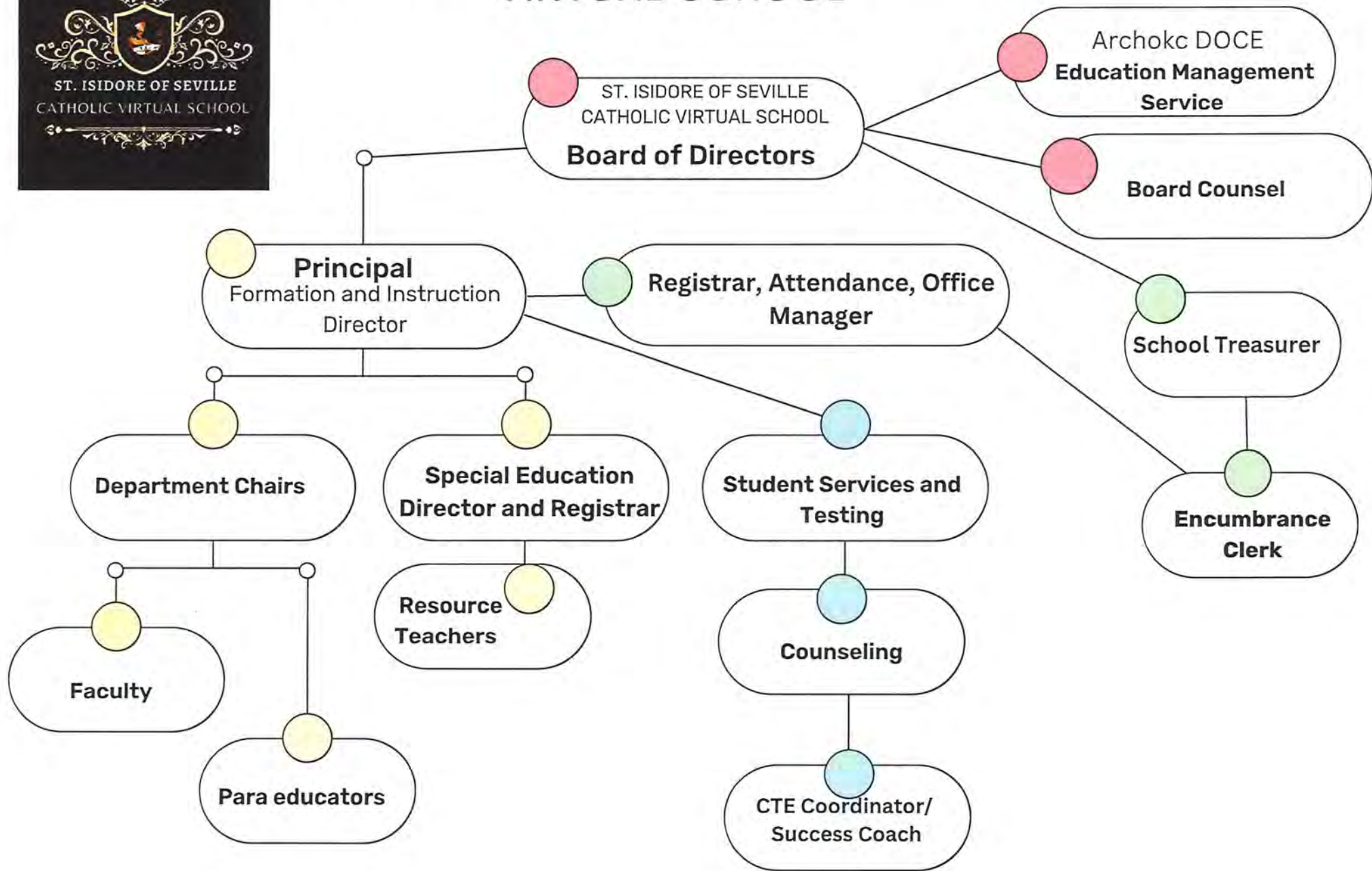


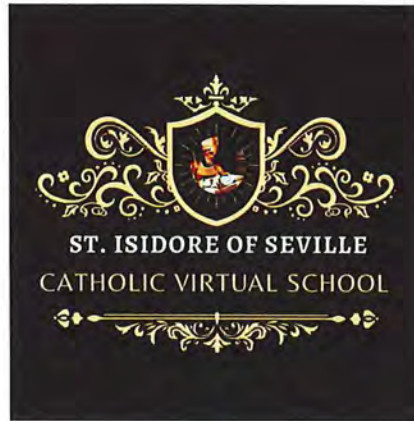


Section 13: Appendix K: Organization Chart



ST. ISIDORE OF SEVILLE CATHOLIC VIRTUAL SCHOOL





Section 13: Appendix L: In-Year Professional Development Calendar



**St. Isidore of Seville Catholic Virtual School
Professional Development Plan**

Session Name	Short Description	
<u>Setting up Canvas for Virtual School Use: BrainPOP, IXL, NewsELA, Raz Kids, and more!</u>	Geared to all teachers who would like to use the supplemental materials (IXL, BrainPOP, Raz Kids, Newsela, and more), to learn everything there is to know about Canvas	July-Aug 2024
<u>FACTS SIS Training</u>	Learn to set up attendance, grade book, record discipline communications, through the school information system.	Aug. 2024
<u>NWEA MAP Training</u>	The NWEA Winter Workshop Series offers selected sessions from our Responsive Learning Cycles, Responsive Math Practices, Responsive Literacy Practices, and Equity Empowered Learning Suites – all areas that offer some of the highest-leverage improvements in teaching practice and enhance your ability to serve all different types of learners. In these workshops you and your teams will gain new knowledge and skills in areas such as applying assessment information within the context of deep academic content knowledge, developing practical strategies to promote instructional equity, and honing day-to-day responsive teaching and learning practices that give students ownership and motivation.	Aug. 2024
<u>Socratic Discussions: Circle-</u> Please obtain a code from the principal to access the webinar series.	In this webinar, Matthew Bianco will introduce Socratic teaching as it was modeled for us by Plato through the character of Socrates. Not just a webinar on the theory and philosophy of Socratic teaching, this webinar will give a practical guide to doing. It will answer very specific and practical questions, such as: <ul style="list-style-type: none"> • What are the prerequisites to Socratic teaching? • What are the stages of Socratic teaching? • What are the tools of Socratic teaching? • What is the right way to start a Socratic lesson? 	Upon demand



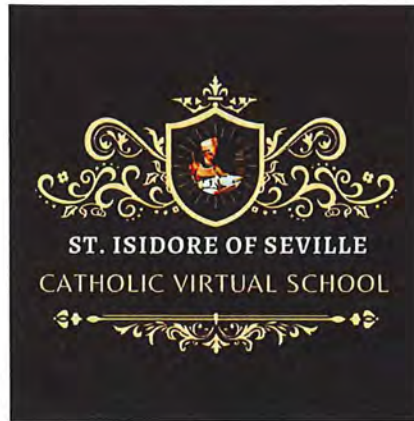
St. Isidore of Seville Catholic Virtual School Professional Development Plan

	<ul style="list-style-type: none"> • What is the best way to end a Socratic lesson? • How do you assess a Socratic lesson? 	
Data Walk	Analyzing student formative data throughout the school and cross referencing with other schools in the archdiocese	Oct. 2024
<u>New! Novel Supports to help your Struggling Readers</u>	Our ELA courses ask students to engage with a variety of texts, including novels, stories and excerpts. Participants in this session will be given access to the resource, along with ways to implement with students.	
<u>Ruah Woods Training</u>	<p>YOU CAN'T GIVE WHAT YOU DON'T HAVE! TOB Campus is an annual school staff formation subscription:</p> <ul style="list-style-type: none"> • Nine group staff formation sessions per year • Monthly round table discussions with TOB Ambassadors across the U.S. • One new Special Topics TOB Course per year • Online Intro. to TOB Course included (workbooks sold separately) • K-8 video TOB curriculum lesson overviews • A personal TOB Campus support staff member from Ruah Woods • Monthly saint reflections • TOB mass petitions, school banners & poster 	Aug. 2024
Canvas: <u>Small Group Differentiation Strategies</u>	Join us to look at some specific activities you can use to differentiate in small groups. We will also take a look at the supplementals provided to you in Canvas and how you can use those to differentiate.	
<u>Supplementals (BrainPOP, IXL, NewsELA, etc...) for Small Group, Whole Group and Independent Work</u>	Based on using resources located in iReady, we will explore ways to use the Tools for Instruction, Teacher Toolbox and Teacher Path lessons to help your students master a concept and how you can collect data on the process to further dive into their needs.	
<u>Pear Deck</u>	Part 1 should be done on your own and looks at the basics of how to create a slide deck and present with Pear Deck. Part 2 is live training and will take a look at the data you can get from a Pear Deck and how to use it.	Aug. 2024



St. Isidore of Seville Catholic Virtual School
Professional Development Plan

<u>Google for Education :</u> <u>Leverage Google tools to enable distance learning</u>	Learn how to use Google tools to keep students engaged while teaching remotely. Discover new ways to assess student learning, check in on student well-being, and communicate effectively with parents and guardians.- 8 Modules, 2 Hr. 40 minutes	Aug-May 2024
<u>IEW- Structure and Style For Student Writing</u>	Join Andrew Pudewa and Julie Walker for an in-depth look at how Structure and Style for Students is impacting students around the globe. Learn about the benefits for teachers and their pupils, hear from others who have found success, and discover if this course might be just what you need to help your students become confident and effective writers.	September 2024
<u>IEW- Ancient World Writing- Units 1 and 2</u>	History Based writing lessons- 9 months of reading response writing that aligns with student studies of the ancient civilizations.	Aug.- May 2024
<u>QPR</u>	Suicide Prevention training for all faculty and staff	Aug. 2024



Section 13: Appendix M: Tax Exempt/ IRS Letter

Internal Revenue Service
P.O. Box 2508
Cincinnati, OH 45201

Department of the Treasury

Date: August 24, 2022

Person to Contact:

R. Meyer ID# 0110429

Toll Free Telephone Number:

877-829-5500

United States Conference of Catholic
Bishops
3211 4th Street, NE
Washington, DC 20017-1194

Group Exemption Number:

0928

Dear Sir/Madam:

This responds to your June 23, 2022, request for information regarding the status of your group tax exemption.

Our records indicate that you were issued a determination letter in March 1946, that you are currently exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code, and are not a private foundation within the meaning of section 509(a) of the Code because you are described in sections 509(a)(1) and 170(b)(1)(A)(i).

With your request, you provided a copy of the *Official Catholic Directory for 2022*, which includes the names and addresses of the agencies and instrumentalities and the educational, charitable, and religious institutions operated by the Roman Catholic Church in the United States, its territories, and possessions that are subordinate organizations under your group tax exemption. Your request indicated that each subordinate organization is a non-profit organization, that no part of the net earnings thereof inures to the benefit of any individual, and that no substantial part of their activities is for promotion of legislation. You have further represented that none of your subordinate organizations is a private foundation under section 509(a), although all subordinates do not all share the same sub-classification under section 509(a). Based on your representations, the subordinate organizations in the *Official Catholic Directory for 2022* are recognized as exempt under section 501(c)(3) of the Code under GEN 0928.

Donors may deduct contributions to you and your subordinate organizations as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to them or for their use are deductible for federal estate and gifts tax purposes if they meet the applicable provisions of section 2055, 2106, and 2522 of the Code.

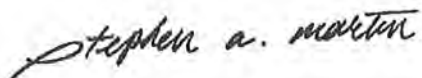
Subordinate organizations under a group exemption do not receive individual exemption letters. Subordinate organizations are not listed in Tax Exempt Organization Search (Pub 78 data), and many are not listed in the Exempt Organizations Business Master

File extract, or EO BMF. Donors may verify that a subordinate organization is included in your group exemption by consulting the *Official Catholic Directory*, the official subordinate listing approved by you, or by contacting you directly. IRS does not verify the inclusion of subordinate organizations under your group exemption. See IRS Publication 4573, *Group Exemption*, for additional information about group exemptions.

Each subordinate organization covered in a group exemption should have its own EIN. Each subordinate organization must use its own EIN, not the EIN of the central organization, in all filings with IRS.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,

A handwritten signature in black ink that reads "Stephen A. Martin". The signature is written in a cursive, flowing style.

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

INDIANA • OKLAHOMA • RHODE ISLAND • MONTANA •
HAWAII • WASHINGTON • VIRGINIA • VERMONT • WYOMING • OHIO

Archdiocese of Oklahoma City

(*Archidiecesis Oklahomapolitana*)



MOST REVEREND PAUL S. COAKLEY

Archbishop of Oklahoma City; ordained May 21, 1983; appointed Bishop of Salina October 21, 2004; installed December 28, 2004; appointed Archbishop of Oklahoma City December 16, 2010; installed February 11, 2011. Catholic Pastoral Center: 7601 Northwest Expwy., P.O. Box 32180, Oklahoma City, OK 73123.

Catholic Pastoral Center: 7601 Northwest Expwy., P.O. Box 32180, Oklahoma City, OK 73123. T: 405-721-5651; F: 405-721-5210.

ESTABLISHED FEBRUARY 6, 1973.

Square Miles 42,470.

Erected into a Vicariate Apostolic by Brief of May 29, 1891. Erected into the Diocese of Oklahoma with the See in Oklahoma City by a Brief of Pope Pius X, August 17, 1905. Name changed to Diocese of Oklahoma City and Tulsa by Bull of Pope Pius XI, November 14, 1930. Erected into Archdiocese of Oklahoma City by a Bull of Pope Paul VI, December 13, 1972. The Province includes the Dioceses of Tulsa and Little Rock.

Comprises the following 46 Counties: Alfalfa, Beaver, Beckham, Blaine, Caddo, Canadian, Carter, Cimarron, Cleveland, Comanche, Cotton, Custer, Dewey, Ellis, Garfield, Grant, Grady, Greer, Harmon, Harper, Jackson, Jefferson, Johnston, Kay, Kingfisher, Kiowa, Lincoln, Logan, Love, McClain, Major, Marshall, Murray, Noble, Oklahoma, Pontotoc, Pottawatomie, Roger Mills, Seminole, Stephens, Texas, Tillman, Washita, Woods and Woodward.

For legal titles of parishes and archdiocesan institutions, consult the Secretariat for Administration.

STATISTICAL OVERVIEW

Personnel	Administered by Deacons.....	2	Catechesis / Religious Education:	
Archbishops.....	Missions.....	46	High School Students.....	3,081
Retired Archbishops.....	Professional Ministry Personnel:		Elementary Students.....	6,782
Abbots.....	Sisters.....	10	Total Students under Catholic Instruction.....	14,684
Retired Abbots.....	Lay Ministers.....	91	Teachers in Diocese:	
Priests: Diocesan Active in Diocese.....	Welfare		Sisters.....	1
Priests: Retired, Sick or Absent.....	Catholic Hospitals.....	10	Lay Teachers.....	437
Number of Diocesan Priests.....	Total Assisted.....	1,188,938	Vital Statistics	
Religious Priests in Diocese.....	Homes for the Aged.....	6	Receptions into the Church:	
Total Priests in your Diocese.....	Total Assisted.....	723	Infant Baptism Totals.....	1,777
Extern Priests in Diocese.....	Special Centers for Social Services.....	2	Minor Baptism Totals.....	255
Ordinations:	Total Assisted.....	10,573	Adult Baptism Totals.....	127
Diocesan Priests.....	Residential Care of Disabled.....	1	Received into Full Communion.....	445
Permanent Deacons.....	Total Assisted.....	130	First Communions.....	2,339
Permanent Deacons in Diocese.....	Educational		Confirmations.....	2,706
Total Brothers.....	Diocesan Students in Other Seminaries.....	19	Marriages:	
Total Sisters.....	Total Seminarians.....	19	Catholic.....	416
Parishes	High Schools, Diocesan and Parish.....	3	Interfaith.....	118
Parishes.....	Total Students.....	1,376	Total Marriages.....	534
With Resident Pastor:	Elementary Schools, Diocesan and Parish.....	15	Deaths.....	1,016
Resident Diocesan Priests.....	Total Students.....	3,403	Total Catholic Population.....	182,186
Resident Religious Priests.....	Non-residential Schools for the Disabled.....	1	Total Population.....	2,277,331
Without Resident Pastor:	Total Students.....	24		
Administered by Priests.....				

LEADERSHIP

Moderator of the Curia and Vicar General -
 (1) 405-721-1811 Very Rev. William L. Novak
 (wnovak@archoke.org)
 Chancellor - (1) 405-721-1811 Dr. Michael A.
 Scaperlanda (mscaperlanda@archoke.org)

ADMINISTRATION

Secretariat for Administration - (1) 405-721-1811
 Archives - (1) 405-721-5651 x141 George Rigazzi,
 Archivist;
 Finance - David J. Johnson, CFO;
 Priests' Medical Fund - Very Rev. William L.
 Novak, Moderator of the Curia & Vicar Gen.;
 Priests' Retirement Trust Fund - David J. Johnson;
 Human Resources - Rhonda McMillan, Dir.;
 Propagation of the Faith, Holy Childhood Assoc.,
 Missionary Cooperation Plan - (1) 405-721-5651 David
 J. Johnson;
 Safe Environment Coordinator - (1) 405-709-2748 Page
 Houser;
 Victim Assistance Coordinator - (1) 405-720-9878
 Jennifer Goodrich;

**ADVISORY BOARDS, COMMISSIONS,
COMMITTEES AND COUNCILS**

Archdiocesan Finance Council -
 djohnson@archoke.org Michael Milligan, Chmn.; Steve
 Brown; Joe Fleckinger;
 Building and Real Estate Committee - Very Rev.
 William L. Novak, Pres. (wnovak@archoke.org); Steve
 Cooper, Chmn. (scooper@archoke.org); John Wund,
 Secy.;

CLERGY AND RELIGIOUS SERVICES

Secretariat for Clergy and Consecrated Life and
 Vocations - (1) 405-721-9351
 Blessed Stanley Rother Cause - Dcn. Norman
 Mejsnik, Dir.;
 Clergy Education - Rev. Joseph M. Irwin, Coord.;
 Master of Ceremonies - Rev. Robert T. Wood, Dir.;
 Rev. Stephen V. Hamilton, Asst.; Rev. Cory D.
 Stanley, Asst.;
 Priests' Nurse - (1) 405-709-2731 Suzanne Clem;
 Permanent Diaconate - Dcn. Norman Mejsnik, Dir.;
 Vicar for Priests - Rev. Joseph M. Irwin;
 Vocations and Seminarians - Rev. Brian E. Buetner,
 Dir.; Rev. John D. Herrera, Assoc. Dir.; Rev. John
 Paul Lewis, Assoc. Dir.;

COMMUNICATIONS

Communications - (1) 405-721-1810 Diane Clay, Dir.

(dclay@archoke.org);
 Sooner Catholic Newspaper -

CONSULTATIVE BODIES

Archdiocesan Consultation - Very Rev. William L. Novak
 (wnovak@archoke.org); Rev. Raymond K. Ackerman
 (raymond.ackerman@archoke.org); Rev. Stephen J.
 Bird (sbird@archoke.org);
 Presbyteral Council - Rev. Stephen V. Hamilton, Chmn.
 (shamilton@archoke.org); Rev. Mark E. Mason, Vice
 Chmn., Elected Member; Rev. Oby J. Zunmas, Southeast
 Deanery, Sec./Treas.;
 Priests' Personnel Board - Very Rev. William L. Novak
 (wnovak@archoke.org); Rev. Joseph M. Irwin
 (jirwin@archoke.org); Rev. Brian E. Buetner, Mem.
 (bbuetner@archoke.org);
 Vocations Board - (1) 405-721-9351
 bbuetner@archoke.org Sr. Maria of the Trinity
 Faulkner (smariao@gospeloffidisciples.org); Dr. Lora
 Webb, Luis Soto;

DEANERIES

Central North Deanery - Rev. Stephen J. Bird
 (sbird@archoke.org);
 Central South Deanery - Rev. Timothy M. Fuller;
 Northwest Deanery - Rev. Christopher T. Brashers
 (chrashers@archoke.org);
 Northeast Deanery - Rev. Carson Krittenbrink
 (carson.krittenbrink@archoke.org);
 Southwest Deanery - Rev. Philip M. Seeton
 (philip.seeton@archoke.org);
 Southeast Deanery - Rev. Oby J. Zunmas
 (oby.zunmas@archoke.org);

EVANGELIZATION

Secretariat for Evangelization and Catechesis -
 (1) 405-721-5651 x201 jbeckman@ArchOK.org Jim
 Beckman, Exec. Dir.;
 American Indian Catholic Outreach - (1) 918-822-3255
 nativeamerican@archoke.org Dcn. Roy Don
 Callison, Coord.;
 Blessed Stanley Rother Institute - Dr. Jason
 Fugikawa, Dir.;
 Hispanic Leadership Development -
 Catholic Education - (1) 405-709-2701 Lara Schuler,
 Dir.;
 Children's Evangelization and Discipleship - Noelle
 McHugh, Dir.;
 Ecumenical and Interreligious Affairs -
 Marriage and Family Life Ministry - Dr. Alex
 Schimpf, Dir.;
 Family Enrichment / Disability Ministries -

Respect Life Coordinator -
 OLOG Camp - (1) 405-277-6408 Bill Wells, Dir.;
 Parish Leadership Engagement - Dr. Lurann Wilson,
 Dir.;
 Prison Ministry - Dcn. James E. Smith, Coord.;
 Rural Life (Vacant) -
 Scouting - Chad and Janie Goodman, Catholic Scouts
 Outside of Parishes; Mutt Jackson, Scouting in
 Parishes;
 Youth, Young Adult and Campus Evangelization and
 Discipleship - Joseph Cipriano, Dir.;
 Campus Evangelization and Discipleship -
 Youth Evangelization and Summer Camp -

FACILITIES

Catholic Pastoral Center - (1) 405-721-5651 x104 Shari
 Conrady, Assoc. Dir. (sconrady@archoke.org);
 St. Francis de Sales Seminary - Most Rev. Paul S.
 Conkley; David Johnson, Treas.;

ORGANIZATIONS

Catholic Lawyers Guild - (1) 405-721-5651 Dr. Michael
 A. Scaperlanda (mscaperlanda@archoke.org);
 Catholic Physicians Guild - (1) 405-942-4084 Rev.
 Richard D. Stansberry Jr., Chap.
 (rstansberry@archoke.org);
 Archdiocesan Council of Catholic Women - Rev. Bill H.
 Pruett (bpnuett@archoke.org);

SPIRITUAL LIFE

Secretariat for Divine Worship - (1) 405-721-5651 x451
 Rev. Stephen J. Bird, Dir. (sbird@archoke.org); Rev.
 Zachary Bozman, Assoc. Dir.
 (Zachary.Bozman@archoke.org);

STEWARDSHIP

Secretariat for Stewardship and Development -
 (1) 405-709-2745 stewardship@archoke.org Peter de
 Kertry, Exec. Dir. (pdkertry@archoke.org);
 Assembly of Catholic Professionals -
 One Church, Many Disciples Campaign -

TRIBUNAL

Metropolitan Tribunal of Oklahoma - (1) 405-721-5651
 x401
 Judicial Vicar - Rev. Richard D. Stansberry Jr.;
 Adjunct Judicial Vicar - Rev. Bill H. Pruett;
 Collegiate Judges - Rev. Christopher T. Brashers;
 Rev. William Banowsky; Matthew Robinson;
 Defender of the Bond - Rev. Francis T. Nguyen;
 Notaries - Edith Miranda; Ana Romero; Carol
 Davito;

PARISHES, MISSIONS, AND CLERGY**STATE OF OKLAHOMA**

ADA
 St. Joseph - 1300 E. Beverly St., Ada, OK 74820;
 Mailing: P.O. Box 1585, Ada, OK 74820
 (1) 580-332-4811 pomstjosephada@gmail.com
 www.stjosephada.com Rev. Aaron J. Foshee, Pst.; Dcn.
 Dennis D. Fine; CRP Stds.: 99

St. Francis Xavier - 700 E. Oklahoma, Sulphur, OK
 73086; Mailing: 1313 E. 7th St., Sulphur, OK 73086
 (1) 580-622-3070 altersociety@yahoo.com Rosalina
 Aguilero-Hoyte, Parish Life Coord.;

ALTUS

Prince of Peace - 1500 Falcon Rd., Altus, OK 73521
 (1) 580-482-3363 secretary@popaltus.org
 www.princeofpeacealtus.org Rev. Joseph David, Pst.;
 Dcn. Eulis Mobley; Judy Cosway, Music Min.; CRP
 Stds.: 99

St. Helen Church - 507 E. Highview, Frederick, OK
 73542; Mailing: 1500 Falcon Rd., Altus, OK 73521
 www.sthelenok.org Rev. Joseph David, Pst.;

ALVA

Sacred Heart - 627 12th St., Alva, OK 73717
 (1) 580-327-0339 office@sacredheartalva.org
 sacredheartalva.org/ Rev. Bafraj Sagili Jesusdas, Pst.;

CRP Stds.: 42
 Our Mother of Mercy - 1325 Main St., Wynoka, OK
 73060

St. Cornelius - 404 S. Massachusetts, Cherokee, OK
 73728

ANADARKO

St. Patrick's - 1101 W. Petree Rd., Anadarko, OK 73005;
 Mailing: P.O. Box 628, Anadarko, OK 73005
 (1) 405-247-5255 slpat1889@gmail.com
 www.stpatrickanadarko.org/ Rev. Carl William
 Janocha, Pst.; CRP Stds.: 46

Our Lady of the Most Holy Rosary - Hwy. 152,
 Binger, OK 73009; Mailing: P.O. Box 628, Anadarko,
 OK 73005
 St. Richard - Hwy. 9, Carnegie, OK 73015; Mailing:
 P.O. Box 628, Anadarko, OK 73005

ARDMORE

St. Mary - 101 E. St., S.W., Ardmore, OK 73401
 (1) 580-223-0231 stmaryardmore@hotmail.com
 www.stmaryardmore.org Rev. Kevin J. Ratterman, Pst.;
 Dcn. Bob Mary Catholic Highsmith; Dcn. Juan
 Jimenez, Director - Hispanic Ministry/Parish Life; CRP
 Stds.: 154

BLACKWELL

St. Joseph's - 324 W. Bridge, Blackwell, OK 74631;

Mailing: PO Box 578, Blackwell, OK 74631
 (1) 580-363-0441 Rev. Bakswamy Bathini, Pst.; Mistie
 Jackson, DRE; CRP Stds.: 5

CHANDLER

Our Lady of Sorrows - 409 Price Ave., Chandler, OK
 74834; Mailing: P.O. Box 543, Chandler, OK 74834
 (1) 405-258-1239 oshandler@aol.net
 www.ourladyofsorrowschandler.org Rev. Timothy
 Ruckel, Pst.; Dcn. B.D. Tidmore; CRP Stds.: 15
 St. Louis - Hwy. 99 & Eighth Ave, Stroud, OK 74079

CHICKASHA

Holy Name of Jesus Catholic Church - 210 S. 7th St.,
 Chickasha, OK 73018; Mailing: PO Box 748, Chickasha,
 OK 73023 (1) 405-224-6068
 secretary@holynametchickasha.org
 www.holynametchickasha.org Rev. Michael Wheelahan,
 Pst.; Dcn. Louis Nix; Rosa Munoz, DRE; CRP Stds.:
 179

St. Peter Church - E. Second & Quapah, Lindsay, OK
 73052

CLINTON

St. Mary's - 1218 Knox, Clinton, OK 73601; Mailing:
 P.O. Box 1295, Clinton, OK 73601 (1) 580-323-0345
 k.hubbard@stmarysclintonok.org

www.stmaryscatholicok.org Rev. Bahaswamy Mandagiri, Pst.; Den. Hector Hernandez; Kristine Moreno, DRE; Kimber Hubbard, Office Manager; CRP Sids.: 205
St. Anne - 522 E. 3rd, Cordell, OK 73632

DEL CITY

St. Paul, Apostle - 3901 S. Sunnylane Rd., Del City, OK 73115 t) 405-677-4873 stpaul@scotinet.net
stpaulcatholic.org Rev. Joseph Sunder Raja Pudota, Pst.; Den. John J. Pagar; Michelle Hill, Music Min.; Kristen Danner, DRE; CRP Sids.: 23

DUNCAN

Assumption - 711 W. Hickory Ave., Duncan, OK 73533 t) 580-255-0590 pncal@assumptionduncanok.com; rev.p.jandacek@gmail.com

www.AssumptionDuncanOK.com Rev. Peter Jandacek, Pst.; Den. James Conway; Den. Manuel G. Garcia; Den. Mark Gildon; Maria Martinez, DRE; CRP Sids.: 60

Immaculate Conception - Fourth & Comanche. Marlow, OK 73055 t) 580-658-2365

EDMOND

St. Damien of Molokai Church - 8455 N.W. 234th St. / Sorghum Mill, Edmond, OK 73025 t) 405-330-9968 keppriestok@gmail.com www.stdamien.com Latin Mass Apostolate of the Priestly Fraternity of Saint Peter Rev. Simon Zurita, F.S.S.P., Pst.; Rev. Simon Zurita, F.S.S.P., DRE; CRP Sids.: 153

St. John the Baptist - 900 S. Litter Ave., Edmond, OK 73013; Mailing: PO Box 510, Edmond, OK 73083-0510 t) 405-340-9871 (CRP); 405-340-0691 parish_office@stjohn-catholic.org www.stjohn-catholic.org Rev. Raymond K. Ackerman, Pst.; Rev. Alexander Kroll, Assoc. Pst.; Rev. Anthony Ruj. Rant, Assoc. Pst.; Den. Frank Alexander; Den. David Ashton; Den. Robert Dunlap; Den. Randy Hearn; Den. Zach Nagykals; Den. Richard Rosencrass; Jennifer Dolf, Bus. Mgr.; Amy Dennis, Director of Outreach; CRP Sids.: 399

St. Elizabeth Ann Seton School - 8) 925 South Blvd., Edmond, OK 73034-4710 t) 405-348-5364 seas@stjohn-catholic.org www.stelizabethedmond.org Laura Cain, Print. Sids.: 408; Lay Tchrs.: 27

St. Monica - 2001 N. Western, Edmond, OK 73012 t) 405-359-2700; 405-350-2700 (CRP) www.stmonica-edmond.org Rev. Stephen V. Hamilton, Pst.; Rev. Balireddy Ponnapati, Assoc. Pst.; Den. Edward Donosso; Den. Jorge Pereira; James Silk, Youth Min.; Cheryl Lassiter, Coordinator of Children's Formation; CRP Sids.: 256

EL RENO

Sacred Heart - 208 S. Evans Ave., El Reno, OK 73036-3636 t) 405-262-1405 pastor@sacredheartelreno.com www.sacredheartelreno.com Rev. Lance A. Warren, Pst.; CRP Sids.: 140

Sacred Heart School - (Grades PreK-8) 210 South Evans, El Reno, OK 73036 t) 405-262-2284 sacredheart@cox.net Shannon Stutton, Prin.; Sids.: 98; Lay Tchrs.: 8

ELGIN

St. Ann - 8492 St. Hwy. 17, P.O. Box 10, Elgin, OK 73538 t) 580-492-5914 stann@tds.net www.triparishok.org Rev. Rayanna Narisetil, Pst.; Den. Thomas E. Biles, DRE; CRP Sids.: 50

Our Lady of Perpetual Help - 230 N. A St., Sterling, OK 73567

Mother of Sorrows - 521 E. Wallace, Apache, OK 73006

ELK CITY

St. Matthew's - 3001 E. Hwy. 66, Elk City, OK 73644-9907 t) 580-225-0066 stmatthew@outlook.com dgrover2010@gmail.com www.stmatthew.wconnect.com Rev. Daniel G. Grover, Pst.; Kathy Noble, Music Min.; Katie Barlett, DRE; CRP Sids.: 180

Queen of All Saints - 914 N. 5th St., Sayre, OK 73662 t) 580-928-2385

ENID

St. Francis Xavier - 110 N. Madison, Enid, OK 73701; Mailing: P.O. Box 3527, Enid, OK 73702-3527 t) 580-237-0812 xavier_enid@yahoo.com www.stfrancisendok.com Rev. Mark E. Mason, Pst.; Rev. John D. Herrera, Assoc. Pst.; Den. Anthony Crispos; Den. Val Ross; CRP Sids.: 642

St. Joseph Catholic School - (Grades PreK-5) t) 580-242-4449 school@stjosephschoolenid.com stjosephschoolenid.com Wade Laffey, Prin.; Sids.: 100; Lay Tchrs.: 10

St. Michael - St. Gregory the Great - 1924 W. Wilcox Rd., Enid, OK 73703 t) 580-233-4589 stgregorys@shglohal.net mfrancisend@yahoo.com

GUTHRIE

St. Mary - 411 N. Elm, Guthrie, OK 73044; Mailing: PO Box 1556, Guthrie, OK 73044 t) 405-282-4239 x4 office@stmaryguthrie.com www.stmaryguthrie.com Rev. James A. Wickardham, Pst.; Den. James S. Fourcade; CRP Sids.: 45

St. Margaret Mary - 700 N. Grand, Crescent, OK 73028; Mailing: PO Box 632, Crescent, OK 73028

GUYNOM

St. Peter's - 1220 N. Quinn St., Guymon, OK 73942 t) 580-338-7212 sec@panhandlecatholic.org www.panhandlecatholic.org Den. Joe Cruz; Den. Luis De La Garza; Den. German Rodriguez; Rev. Christopher T. Bradshaw, Pst.; Rev. Jerome Krug, Par. Vicar; Rev. Raul Sanchez, Par. Vicar; CRP Sids.: 234

Sacred Heart - 105 N. Albright, P.O. Box 468, Hooker, OK 73945 www.panhandlecatholic.org

Good Shepherd - S. Ellis at Second, P.O. Box 966, Boise City, OK 73933

St. Frances Cabrini - 101 Ave. C, Beaver, OK 73932

HARRAH

St. Teresa of Avila - 1576 Tim Holt Dr., Harrah, OK 73045 t) 405-454-2819; 405-451-9440 (CRP) staharrah@gmail.com www.stteresa-harrah.org Rev. Deva Undralla, Pst.; CRP Sids.: 110

Saint Vincent de Paul Church - 123 S. 9th St., McLoud, OK 74851; Mailing: P.O. Box 585, McLoud, OK 74851 stvincentmcloud@gmail.com

HENNESSEY

St. Joseph's - 211 N. Cherokee St., Hennessey, OK 73742 t) 405-853-2158 stjoseph@pkf.net stjosephhennesseyok.com Rev. Edward T. Menasco, Pst.; Den. Jeffrey Kelly; CRP Sids.: 159

St. Joseph - 17402 S. Van Buren St., Bison, OK 73720; Mailing: P.O. Box 117, Bison, OK 73720

KINGFISHER

SS. Peter and Paul - 309 S. Main, Kingfisher, OK 73750 t) 405-375-4581 secretary@stpeterandpaul.org www.stpeterandpaul.org Rev. Francis T. Nguyen, Pst.; Den. Terrence R. Rice; Sandy Murray, DRE; CRP Sids.: 161

St. Rose of Lima - 900 N. Clarence Nash Blvd., Watonga, OK 73772

KONAWA

Sacred Heart - 47943 Abbey Rd., Konawa, OK 74849 t) 580-925-2145 Sacredheartok@gmail.com; sacredheartok@gmail.com Rev. Joseph Reddy Duggempu, Admin.; CRP Sids.: 13

St. Mary - 3rd and Miller, Wanette, OK 74878; Mailing: 4795 Abbey Rd., Konawa, OK 74849 Rev. Joseph Roddy Duggempu, Admin.

LAWTON

Blessed Sacrament - 12 SW 7th Street, Lawton, OK 73501; Mailing: PO Box 2546, Lawton, OK 73502 t) 580-355-2054 re@lawtoncatholic.com; office@lawtoncatholic.com www.lawtoncatholic.com Rev. John Paul Lewis, Pst.; Den. Howard Dale Harper; Den. Robert L. Quinetti Jr.; Alicia Brienton, Safe Environment Coordinator; Laura Lynn Harper, Director of Evangelization and Catechesis; Joanne Linville, Office Manager; CRP Sids.: 112

St. Patrick Church - 202 E. Ohio Street, Walters, OK 73752 t) 580-255-0990

pncal@assumptionduncanok.com

Holy Family - 1010 N.W. 82nd St., Lawton, OK 73505 t) 580-536-6355 (CRP); 580-536-6351 (Office)

vgable@holyspiritlawton.org; mromaka@holyspiritlawton.org www.holyspiritlawton.org (Formerly St. Barbara) Rev. Philip M. Sexton, Pst.; Den. James Cerrore; Vicki Cable, DRE; Den. David B. Bunch; Den. Wuse Cam; Den. Jim Cox; Den. Anthony Layton; Den. Michael J. Romaka, Bus. Mgr.; CRP Sids.: 143

MADILL

Holy Cross Church - 14 W. Francis St., 1010 S. 5th, Madill, OK 73446-3234; Mailing: P.O. Box 791, Madill, OK 73446-0791 t) 580-795-3721; 903-312-5956 (CRP) heccmadill@hotmail.com; robriobert60123@gmail.com Rev. Oby J. Zunigas, Pst.; Den. Gus Orellana; Roberta Roberts, DRE; Carol Steinbock, DRE; CRP Sids.: 195

Good Shepherd - 200 N.W. 4th, P.O. Box 127, Marietta, OK 73448 t) 580-276-9604

MANGUM

Sacred Heart - 409 N. Myers, Mangum, OK 73554; Mailing: P.O. Box 310, Mangum, OK 73554 t) 580-450-8451 c) 580-471-9918 kgelnar@yahoo.com; chonchoo@shglohal.net Rev. Arakiasamy Andarias, Pst.; Kathy Gelnar, DRE; CRP Sids.: 80

St. Peter and Paul - 328 S. Rundlett St., Hobart, OK 73651 t) 580-682-3011; 580-682-4006 urudk@shglohal.net www.stpeter-paul.com Sandra Nash, Secy.; Amy Rudkins, Contact; Our Lady of Guadalupe - 534 E. Chestnut, Hollis, OK 73550 c) 580-381-0480 (DRE); 580-471-5248 (Secy) emin_flores@yahoo.com; olghollock@gmail.com Ester Flores, DRE;

MEDFORD

St. Mary's - 214 W. Cherokee, Medford, OK 73759-0360; Mailing: Box 360, Medford, OK 73759-0360 t) 580-741-0201 (CRP); 580-395-2148 Rev. Joseph Nettem, Pst.; CRP Sids.: 26

St. Mary's Assumption - Main & Birch, Wakita, OK 73771

St. Joseph's - S. Hwy. 81, Pond Creek, OK 73766 josephnettem78@gmail.com

MIDWEST CITY

St. Philip Neri - 1107 Felix Pl., Midwest City, OK 73110-5331 t) 405-737-4476 x102 (CRP); 405-737-4476 x100 drc@stphilnmidwest.org; sec@stphilnmidwest.org www.stphilnmidwest.org Rev. Robert T. Wood, Pst.; Den. Norman Meistrick; Den. Javier Sofia; Den. James Tucker; Den. Richard Painter; CRP Sids.: 97

St. Philip Neri School - (Grades PreK-8) 1121 Felix Pl., Midwest City, OK 73110-5331 t) 405-737-4496 hener@stphilnmidwest.org www.stphilnmidwest.org/Brenda Tener, Prin.; Sids.: 169; Lay Tchrs.: 15

MOORE

St. Andrew the Apostle Catholic Church - 800 N.W. Fifth St., Moore, OK 73160 t) 405-799-3334 ttrind@standrewmoore.com; agrover@standrewmoore.com www.standrewmoore.com Rev. John W. Feehily, Pst.; Den. George Foubert; Den. Thai Phum; Tomasita Truu, DRE; CRP Sids.: 128

MUSTANG

Holy Spirit Catholic Church - 1100 N. Saru Rd., P.O. Box 246, Mustang, OK 73064 t) 405-376-5633 (CRP); 405-376-9435 parish@holyspiritmustang.org; plewis@holyspiritmustang.org www.holyspiritmustang.org Rev. Joseph A. Jacobi, Pst.; Den. William A. Hough; Den. Paul D. Lewis, Pst. Assoc.; Geri Hough, Director of the RCIA; Shelley Koons, Bookkeeper; Elizabeth Rivera, Director of Sacred Music; Emily Sanchez, Director of Youth & Young Adult Evangelization; Martha Torres, Director of Children's Evangelization; Magean Wolf, Director of Communications; CRP Sids.: 145

NORMAN

St. Joseph's - 421 East Acres Street, Norman, Norman, OK 73071; Mailing: PO Box 1227, Norman, Norman, Norman, OK 73070 t) 405-321-8080 hnd.ferjee@stjosephok.org www.stjosephok.org

Don. Richard Montedore; Don. Larry Sousa; Rev. Joseph M. Irwin, Pst.; Rev. Brannon Lepak, Pst. Assoc.; Don. Steve Lewis; CRP Stds.: 127
St. Mark the Evangelist - 3939 W. Tecumseh Rd., Norman, OK 73072-1708 (t) 405-366-7676
 rmcoffing@saintmarknorman.org
 kristin@saintmarknorman.org
 www.saintmarknorman.org; Rev. Timothy M. Fuller, Pst.; Don. Charles L. Allen; Don. Joe Vandervort; CRP Stds.: 210

St. Thomas More University Parish - 1535 Jenkins Avenue, Norman, OK 73072; Mailing: 100 Stinson Street, Norman, OK 73072 (t) 405-321-0990
 bbrink@sttm-ou.org sttm-ou.org Rev. James A. Goins, Pst.; Don. John D. Pigott; Alex Sanchez, Campus Min.; Nolan Reilly, Music Min.; Casey Partridge, Parish Life Coord.; Cathy Irwin, DRE; Brigid Beirck, Bus. Mgr.; CRP Stds.: 130

OKARCHE

Holy Trinity - 211 W. Missouri, Okarche, OK 73762-0185; Mailing: P.O. Box 185, Okarche, OK 73762-0185 (t) 405-263-7930 info@holyltrinityok.org
 www.holytrinityok.org; Rev. Cory D. Stanley, Pst.; Don. Charles Krumnick; Don. Max Schwarz; CRP Stds.: 103
Holy Trinity School - (Grades PreK-8) 2nd and Missouri, Okarche, OK 73762; Mailing: P.O. Box 485, Okarche, OK 73762 (t) 405-263-4422
 anewman@holyltrinityok.org holyltrinityok.org/school Alice Newman, Prin.; Stds.: 128; Lay Tchrs.: 30
Immaculate Heart of Mary - 107 Freeline, Culmet, OK 73014 instantly@iholytrinityok.org

OKEEENE

St. Anthony's - 211 S. 5th, Okeene, OK 73763; Mailing: P.O. Box 767, Okeene, OK 73763 (t) 580-822-3544; 580-822-3511 (Rectory) stanthony@tds.net Rev. Jaroslav P. Topolewski, Pst.; Don. Michael Buchanan; Don. Paul Reinart; CRP Stds.: 40

St. Ann - 424 S. 6th, P.O. Box 55, Fairview, OK 73737 (t) 580-227-2270

St. Thomas - P.O. Box 624, Seiling, OK 73663 (t) 580-922-4376

OKLAHOMA CITY

Cathedral of Our Lady of Perpetual Help - 3214 Lake Ave., 3214 N. Lake Ave. Oklahoma City, OK 73118 (t) 405-525-2349 x140 (CRP); 405-525-2349
 mail@cathednlake.org; freilly@cathednlake.org
 www.cathednlake.org; Don. William Enos; Don. De Forest W. Hearn; Rev. Richard D. Stansberry Jr., Rector; Rev. Thanh Van Nguyen, Assoc. Pst.; Don. Hans Nguyen; Don. Jacob Nguyen; Faith L. Reilly, DRE; CRP Stds.: 300

Bishop John Carroll Cathedral School - (Grades PreK-8) 1101 N.W. 31, Oklahoma City, OK 73118; Mailing: 1100 N.W. 32, Oklahoma City, OK 73118 (t) 405-525-0956 principal@bjccs.org www.bjccs.org Tim McFadden, Prin.; Stds.: 234; Lay Tchrs.: 18

St. Andrew Dung-Lac - 3115 S. W. 59th St., Oklahoma City, OK 73119; Mailing: P.O. Box 891584, Oklahoma City, OK 73189 (t) 405-681-2665 vietgreg@gmail.com; huennguyen2001@msn.com

www.saintandrewdunglacok.org Rev. Gregory Nguyen, Pst.; Don. Khu Nguyen; Don. Ty V. Nguyen; Don. Cuu Nguyen; CRP Stds.: 420

St. Charles Borromeo - 5024 N. Grove Ave., Oklahoma City, OK 73122 (t) 405-789-2595
 secretary@stcharlesok.org www.stcharlesok.org Rev. Timothy D. Luschen, Pst.; Rev. William Banowsky, Par. Vicar; Don. Bill King; Don. Thomas Phan; Don. Chet Barlett; CRP Stds.: 495

St. Charles Borromeo School - (Grades PreK-8) 5000 N. Grove St., Oklahoma City, OK 73122 (t) 405-789-0224 office@scbsok.org scbsok.org Todd Gungall, Prin.; Stds.: 161; Lay Tchrs.: 15

Christ the King - 8005 Dorset Dr., Oklahoma City, OK 73120-4713; Mailing: P.O. Box 20508, Oklahoma City, OK 73156-0508 (t) 405-842-1481 jenn@ckok.org; niargaret@ckok.org www.ckok.org Rev. Rex A. Arnold, Pst.; Rev. Prabhakar Kallavala, Par. Vicar; Don.

Philip Bodman; Don. Richard L. Boothe III; Don. James E. Smith; Antonio Guzman, Youth Min.; Jennifer Butch, DRE; Margaret Tunell, Children's Formation Coordinator; CRP Stds.: 189

Christ the King School - (Grades PreK-8) 1905 Elmhurst, Oklahoma City, OK 73120-4719 (t) 405-841-3909 spiper@ckschool.com www.ckschool.com Amy Feighny, Prin.; Katelyn Bright, Vice Prin.; Dr. Jenny Richard, Vice Prin.; Stds.: 527; Lay Tchrs.: 36

Church of the Epiphany of the Lord - 7336 W. Britton Rd., Oklahoma City, OK 73132 (t) 405-722-0051 (CRP); 405-722-2110 rediretor@epiphanyokc.com;

epiphany@epiphanyokc.com www.EpiphanyOKC.com Rev. Stephen J. Bird, Pst.; Rev. Benjamin Lwin, Assoc. Pst.; Don. Frank Alexander; Don. Robert Heskamp; Marianne Kokojan, Music Min.; Jenny Fenter, Pst. Assoc.; Tracy Russo, Youth Min.; Mandy Brown, DRE; CRP Stds.: 121

Corpus Christi - 1616 N. Kelley Ave., Oklahoma City, OK 73117; Mailing: 1005 N.E. 15th St., Oklahoma City, OK 73117 (t) 405-236-4301 corpuschristchurch@cox.net corpuschristchurchokc.org Don. Dunn Cumby; Don. J. Bernie Hollier; Rev. Tung Titus Pau, Admin.; Sarah Merchant, DRE; Benton Jones, Bus. Mgr.; CRP Stds.: 68

St. Robert Bellarmine - 121 N.W. 1st St., Jones, OK 73049; Mailing: P.O. Box 260, Jones, OK 73049 (t) 405-399-1727 strobertjones.org

St. Eugene's - 2400 W. Hefner Rd., Oklahoma City, OK 73120 (t) 405-751-7115 x113; 405-751-7115 nanager@steugenes.org; readmin@steugenes.org www.steugenes.org Rev. Donald J. Wolf, Pst.; Rev. Vic Luong, Assoc. Pst.; Rev. John J. Mejia Munoz, Assoc. Pst.; Don. Adolfo Aleman; Don. Robert Blakely; Don. Terence Givens; Don. Thomas O. Goldworthy; Judi Wilkinson, DRE; Don. Alejandro Randolph; Don. Patrick Guffroy; Don. Mickey Reeves; CRP Stds.: 356

St. Eugene School - (Grades PreK-8) (t) 405-751-0067 principal@steugeneschool.org www.steugeneschool.org Molly Goldworthy, Prin.; Stds.: 322; Lay Tchrs.: 24

St. Francis of Assisi - 1901 NW 18th St., Oklahoma City, OK 73106 (t) 405-528-0485 teresa-schumacher@att.net; secretary@stfranciscoke.com www.stfranciscoke.com Very Rev. William L. Novak, Pst.; Rev. Linh N. Bui, Assoc. Pst.; Don. John Harned; Alvez Barkoskie IV, Music Min.; Teresa Schumacher, DRE; Jill Jacoby, Bus. Mgr.; CRP Stds.: 75

Rosary Catholic School - (8) 1919 N.W. 18th St., Oklahoma City, OK 73106 (t) 405-525-9272 principal@rosaryschool.com www.rosaryschool.com

Christy Harris, Prin.; Stds.: 249; Lay Tchrs.: 29
Holy Angels - 317 N. Blackwelder St., Oklahoma City, OK 73106 (t) 405-232-6572

parish_office@holyanngelsokc.org
 www.holyangelsokc.org Rev. Russell L. Hewes, Pst.; Don. Sergio Vera-Silva; Jose M. Marul, Bus. Mgr.; CRP Stds.: 285

St. James the Greater - 4201 S. McKinley, Oklahoma City, OK 73109 (t) 405-636-6840 (CRP); 405-636-6800 office@stjamesokc.com; reia@stjamesokc.com www.stjames-catholic.org Rev. Bill H. Pruett, Pst.; Rev. Scott A. Boeckman, Assoc. Pst.; Don. Marti Gußkers; Don. Fernando Hernandez; Don. Long Luong; Don. Arnaldo Moreno; Angelecia Nizn, DRE; CRP Stds.: 541

St. James the Greater School - (Grades PreSchool-8) 1224 S.W. 41st St., Oklahoma City, OK 73109 (t) 405-636-6810 avazquez@stjames-catholic.org Alicia Vazquez, Prin.; Stds.: 177; Lay Tchrs.: 15

St. Joseph Old Cathedral - 307 NW 4th Street, Oklahoma City, OK 73102; Mailing: P.O. Box 408, Oklahoma City, OK 73101 (t) 405-235-4565 office@sjocokc.org www.sjocokc.org Rev. Brian E. Buettner, Pst.; Rev. Miguel Eli Ayuso, Assoc. Pst.; Don. Paul Albert; Don. Dave Ashton; Don. Herbert Reeves; Vancor; CRP Stds.: 90

Korean Martyrs - 2600 S.W. 74th St., Oklahoma City, OK 73159 (t) 405-681-6464 kmcc7517@gmail.com Rev. Sung Hun Yi, STM, Pst.; Rev. Rukun Park, STM, Par. Vicar; CRP Stds.: 1

Our Lady of Mount Carmel and St. Therese Little Flower - 1125 S. Walker Ave., Oklahoma City, OK 73109-1341 (t) 405-235-2037 lfokc@gmail.com littleflowerparishokc.org/ Little Flower Clinic: Free medical service for the poor. Rev. Luis Gerardo Belmonte-Luna, O.C.D., Pst.; Rev. Jesus Sanchez, O.C.D., Par. Vicar; Sr. Maria Carolin Ceja, M.E.S.T., DRE; CRP Stds.: 380

Eucharistic Missionaries of St. Theresa - 526 S.W. 10th St., Oklahoma City, OK 73109 (t) 405-235-2037

St. Patrick Church - 2121 N. Portland, Oklahoma City, OK 73107 (t) 405-946-4441 info@stpatrickokc.com www.stpatrickokc.com Rev. Joseph H. Arkledge, Pst.; Don. Dianne Fischer; CRP Stds.: 286

Sacred Heart - 2706 S. Shurtel Ave., Oklahoma City, OK 73109 (t) 405-634-2458 re-

yanil@sacredheartokc.org Sacredheartokc.org Rev. J. Santos Licon, Pst.; Rev. Ruben Tena, Par. Vicar; Lißana Duron, DRE; CRP Stds.: 675

Sacred Heart School - 2700 S. Shurtel Ave., Oklahoma City, OK 73109 (t) 405-634-5673 principal@sacredheartokc.org

www.sacredheartokc.org Adriana Garza, Prin.; Stds.: 136; Lay Tchrs.: 12

PAULS VALLEY

St. Catherine of Siena - 205 W. Bert St., Pauls Valley, OK 73075 (t) 405-238-3741 st.cathofsienna@att.net

www.stcatherineofsiennacatholicpcv.com/ Rev. Nerio A. Espinoza, Pst.; Don. Juan Fruusto; Don. Adrian Meave; CRP Stds.: 52

PERRY

St. Rose of Lima - 421 9th St., Perry, OK 73077; Mailing: PO Box 603, Perry, OK 73077 (t) 580-336-9300

ej 580-786-8283 stroseperry@sboglobal.net www.stroseperry.com Rev. Balu Raju Palola, Pst.; CRP Stds.: 24

Sacred Heart - Broadway & Lowe, Balmings, OK 74630

PONCA CITY

St. Mary's Catholic Church - Legal Title: St. Mary's Catholic Church 707 E. Ponca Ave., Ponca City, OK 74601; Mailing: 408 S. 8th St., Ponca City, OK 74601-5551 (t) 580-382-6010 (CRP); 580-765-7794 drestmarys@gmail.com; office@stmarypc.com www.stmarypc.com Don. Richard Robinson; Rev. Curson Kittenbrink, Pst.; Rev. Zachary Bouzman, Assoc. Pst.; Bridgit Coleman, DRE; CRP Stds.: 78

St. Mary - (Grades PreK-8) 415 S. 7th, Ponca City, OK 74601 (t) 580-765-4387 info@stmarysponcity.org www.stmaryspok.com Sarah Hunaker, Prin.; Stds.: 110; Lay Tchrs.: 11

St. Francis of Assisi - 610 W 9th St., P.O. Box 11, Newkirk, OK 74647

Father.Kittenbrink@gmail.com; sfnewkirk@sboglobal.net Don. William Horinek;

PRAGUE

St. Wenceslaus, National Shrine of the Infant Jesus of Prague - 304 Jim Thorpe Blvd., Prague, OK 74864; Mailing: Box 488, Prague, OK 74864 (t) 405-567-3080

infantofprague@prague Shrine of the Infant Jesus of Prague, Rev. Long N. Phan, Pst.; Cecilia Hecker, DRE;

St. Michael - 217 S. Koonce, P.O. Box 684, Meeker, OK 74855 (t) 405-567-3080

longphann@prague@yahoo.com

PURCELL

Our Lady of Victory - 307 W. Jefferson St., Purcell, OK 73080; Mailing: P.O. Box 1280, Purcell, OK 73080 (t) 405-527-3077 info@olvpurcell@gmail.com

olvpurcell.org Rev. John Peter Swaminathan, Pst.; Don. Jose Ortiz; Don. John Warren; CRP Stds.: 134

SHAWNEE

St. Benedict - 632 N. Kickapoo, Shawnee, OK 74801 (t) 405-275-5399 (CRP); 405-275-0001

www.stbenedictchurch.net Rev. Joseph Patrick Schwarz, Pst.; Rev. Lawrence Damian, Assoc. Pst.; Don. David

Schrupp; Dcn. William T. Thurnau; CRP Sds.: 80
St. Joseph Chapel - 702 S. Seminole, Wewoka, OK
74884
Immaculate Conception - 811 W. Wrangler Blvd.,
P.O. Box 164, Seminole, OK 74818-0164
t) 405-382-3602

TOKAWA

St. Joseph's - 320 W. North St., Tonkawa, OK 74653;
Mailing: P.O. Box 535, Tonkawa, OK 74653
t) 580-628-2416 c) 580-761-6937
stjosephntonkawa@att.net www.stjosephntonkawa.org
Rev. Balaswamy Bathini, Pst.; CRP Sds.: 37

UNION CITY

St. Joseph's - 403 N. Kate Boevers St., P.O. Box 100,
Union City, OK 73090 t) 405-483-5329; 405-274-2042
(CRP) pastor@stjosephuc.com www.stjosephuc.com
Rev. Lance A. Warren, Pst.; Dcn. Lloyd Menz; Deana
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WEATHERFORD

St. Eugene's - 704 N. Bryan, Weatherford, OK 73096

t) 580-772-3209 ste_secretary@att.net Rev. Kelly L.
Edwards, Pst.; CRP Sds.: 15
Blessed Sacrament - 530 N. Oklahoma, Thomas, OK
73669

Sacred Heart - 204 N. Clark Ave., Hinton, OK 73047
WOODWARD

St. Peter's - 2020 Oklahoma Ave., Woodward, OK 73801
t) 580-256-2966 (CRP); 580-256-5305
stpsongbird@sbeglobal.net; speterdrei@sbeglobal.net
stpeterwolk.org Rev. Cristobal De Lora, Pst.; Rev.
Christuraj Maddhichetty, Assoc. Pst.; Dcn. Santiago
Oniverus; CRP Sds.: 246

Sacred Heart - 301 N. Main, Mooreland, OK 73852;
Mailing: 2020 Oklahoma Ave., Woodward, OK 73801

Holy Name - 600 S. Main, Shattuck, OK 73858;
Mailing: 2020 Oklahoma Ave., Woodward, OK 73801

St. Joseph - 325 S.W. 2nd, Buffalo, OK 73834;
Mailing: 2020 Oklahoma Ave., Woodward, OK 73801

St. Jose Luis Sanchez del Rio - 123 S. Ohio, Lavea,
OK 73848; Mailing: 2020 Oklahoma Ave.,
Woodward, OK 73801 t) 580-256-5305

YUKON

St. John Nepomuk - 600 Garth Brooks Blvd. Yukon,
OK 73099; Mailing: PO Box 850249, Yukon, OK
73085-0249 t) 405-334-2743 dree@sjnkok.org;
uchemak@sjnkok.org www.sjnkok.org Rev. John R.
Metzinger, Pst.; Dcn. Clifford W. Fitzmorris; Dcn.
Larry Germann; Dcn. John Teague; Robert Noble,
Liturgy Dir.; Art Chemak, Parish Life Coord.; Jo Anna
Bannister, Youth Min.; Mariaviv Fitzmorris, DRE; CRP
Sds.: 323

St. John Nepomuk School - (Grades PreK-8)
t) 405-334-2509 principal@sjnkok.org www.sjnkok.org/
school Denise Heard, Prin.; Sds.: 185; Lay Tchr.: 25

SCHOOLS: PRESCHOOL THRU HIGH SCHOOL**SCHOOLS****STATE OF OKLAHOMA****NORMAN**

All Saints Catholic School, Inc. - (PAR) (Grades
PreK-8) 4001 36th Ave., N.W., Norman, OK 73072
t) 405-447-4600 info@allsaintsnorman.org
www.allsaintsnorman.org Dana Wade, Prin.; Teryle
Dionisio, Librn.; Sds.: 399; Lay Tchr.: 12

OKLAHOMA CITY

Good Shepherd Catholic School - (DIO) - 3) DBA:
Good Shepherd Catholic School at Mercy 13404 N.
Meridian, Oklahoma City, OK 73120 t) 405-752-2264
gscs@goodshepherds.org goodshepherds.org Special
needs, Patricia Filer, Dir.; Sds.: 24; Scholastic: 6; Lay

Tchr.: 4

HIGH SCHOOLS**STATE OF OKLAHOMA****OKLAHOMA CITY**

Bishop McGuinness Catholic High School - (DIO)
(Grades 9-12) 801 N.W. 50th St., Oklahoma City, OK
73118 t) 405-843-6638 advancement@bmchs.org
bmchs.org (Coed) Rev. William Banowsky, Chap.; Kelly
Allen, Campus Min.; Robert Epps Jr., Admin.; Anne
Huthcoat, Admin.; Andrew Worthington, Admin.;
David Morton, Pres.; Sds.: 723; Lay Tchr.: 72; Sr.
Tchr.: 1
Cristo Rey Oklahoma City Catholic High School -

(PRV) (Grades 9-12) 900 N. Portland Ave. Oklahoma
City, OK 73107 t) 405-945-9100
info@CristoReyOKC.org
admission@CristoReyOKC.org
www.CristoReyOKC.org Rev. Liah N. Bui, Chap.;
Kelsey Herman, Prin.; Chip Carter, President/CEO;
Lauren Johnson, Director of Admissions; Kurt Primuth,
Director of Corporate Work Study; Ahmed Shadid,
Director of Development; Sds.: 262; Lay Tchr.: 24
Mount St. Mary High School - (DIO) (Grades 9-12)
Sisters of Mercy of the Americas, Archdiocese of
Oklahoma City, 2801 S. Shurtel Ave., Oklahoma City,
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MOORE

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smarin@gospeloflifedisciples.org
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73132 t) 405-709-2783 jpalmer@archoc.org Jayce
Palmer, Pst. Min./Coord.;

Cameron University - 1010 N.W. 82nd, Lawton, OK
73506 t) 580-536-6351
pccetoo@holysfamilylawton.org
holysfamilylawtonoffice.org Rev. Philip M. Sessor;
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P.O. Box 1585, Ada, OK 74820 t) 580-332-4811
pom@stjoseph.edu@gnil.com stjoseph.edu.com/ Rev.
Aaron J. Foshee, Pst.;
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Ponca City, OK 74601-5551 t) 580-765-7794
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Chap.; Chris Beck, Campus Min.;
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Balraj Singilli Jesudas, Pst.;
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catholic.org Rev. Raymond K. Ackerman; Rev.
Alexander Kroll, Chap.; Richard Smith, Campus
Min.;
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secretary@holynamchickasha.org
holynamchickasha.org/ Rev. Michael Wheelahan,
Pst.; Rosa Munoz, Dir.;

CEMETERIES [CEM]**OKLAHOMA CITY**

Resurrection Memorial Cemetery, Inc. - 7500 W. Britton
Rd., Oklahoma City, OK 73132 t) 405-721-4191
resurrectioncm@gmail.com
www.resurrectionmemorialcemetery.com Brinden Seid,
Dir.;

**CONVENTS, MONASTERIES, AND
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City, OK 73132 t) 405-837-7068
srbarbarajoseph@gmail.com www.oksister.com Sr.

Barbara Joseph Foky, C.S.T., Supr.; Srs.: 11
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Oklahoma City, OK 73162 t) 405-721-4390
oklittlesister@yahoo.com Sr. Rosamilla Michael,
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Retirement Center for Sisters of Mercy of Oklahoma,
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PIEDMONT
Carmel of St. Joseph - Legal Titles: Discalced Carmelite
Nuns (Chistered), 2370 Morgan Rd. N.E., Piedmont,
OK 73078-9123 t) 405-373-1735; 405-373-1726
den@okcarmel.org www.okcarmel.org Sr. Donna Ross,
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**ENDOWMENTS / FOUNDATIONS /
TRUSTS [EFT]****ADA**

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ARDMORE

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OKLAHOMA CITY

St. Anthony Hospital Foundation, Inc., Oklahoma City,
Oklahoma - 601 N.W. 11th Street, Oklahoma City, OK
73103 t) 405-272-7070 saints.foundation@csnmc.com
www.giveto saints.com Member of SSM Health Sherry
Rhodes, Vice Pres.;
Catholic Schools Opportunity Scholarship Fund, Inc.,
Tux Credit Scholarship Program, 7301 Northwest Expy.,
Oklahoma City, OK 73132; Mailing: PO Box 32180,

Oklahoma City, OK 73123 (t) 405-709-2745

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HOSPITALS / HEALTH SERVICES [HOS]

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Marynell.Ploch@Mercy.Net www.mercy.net Jacquelyn K. Richmond, Deputy General Counsel; Bed Capacity: 150; Asst. Annu.: 135,333; Staff: 648

Mercy Hospital Logan County, Inc. - 200 S. Academy, Guthrie, OK 73044 (t) 405-283-6700

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HEALDTON

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OKLAHOMA CITY

St. Anthony Hospital - DBA: SSM Health St. Anthony Hospital 1000 N. Lee St., P.O. Box 205, Oklahoma City, OK 73101 (t) 405-272-7000

ramona.carey@ssmhealth.com www.ssmhealth.com A member of SSM Health Care. Tanny Powell, Pres.; Bed Capacity: 688; Asst. Annu.: 336,802; Staff: 3,592

Bone and Joint Hospital at St. Anthony - 1111 N. Dewey, Oklahoma City, OK 73101; Mailing: P.O. Box 205, Oklahoma City, OK 73101 (t) 405-979-8000

A member of SSM Health Care.

Saint Anthony South Hospital - DBA: SSM Health Saint Anthony South Hospital 2129 SW 59th St., Oklahoma City, OK 73119; Mailing: P.O. Box 205, Oklahoma City, OK 73101 (t) 405-713-5751

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www.mercy.net Owned and operated by Mercy Health Oklahoma Communities, Inc. Jacquelyn K. Richmond, Deputy General Counsel; Bed Capacity: 349; Asst. Annu.: 402,779; Staff: 2,723

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ramona.carey@ssmhealth.com Angi Mohr, Pres.; Bed Capacity: 96; Asst. Annu.: 116,985; Staff: 498

TISHOMINGO

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Marynell.Ploch@Mercy.Net Jacquelyn K. Richmond, Deputy General Counsel; Bed Capacity: 25; Asst. Annu.: 5,787; Staff: 59

WATONGA

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KINGFISHER

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OKARCHE

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OKLAHOMA CITY

Blessed Stanley Rother Shrine, Inc. - 700 SE 89th Street, Oklahoma City, OK 73149; Mailing: P.O. Box 32180, Oklahoma City, OK 73123 (t) 405-438-0302

larvidson@archoke.org www.rothershine.org Leif Arvidson, Exec.;

Catholic Conference of Oklahoma - 208 NW 13th Street, Suite # 12, Oklahoma City, OK 73103 (t) 888-514-1135 brett@okcatholic.org www.okcatholic.org Brett Farley, Exec.;

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scmrady@archoke.org www.archoke.org Shari Conrady, Dir.;

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jmoons@ccoke.org ccoke.org Patrick J. Raglow, Secy.;

Villanova Apartments - 305 NW 4th St., Lawton, OK 73507 (t) 580-248-2550

Sister BJ's Pantry, Inc. - 819 NW 4th Street, Oklahoma City, OK 73106; Mailing: 7501 W. Britton Rd., #140, Oklahoma City, OK 73132 (t) 405-837-7068

arburbarajoseph@gmail.com srbjpantry.org An apostolate of the Oklahoma Carmelite Sisters of St. Therese of the Infant Jesus, Oklahoma City, OK, Sr. Barbara Joseph Foley, C.S.T., Pres.;

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National Shrine of the Infant Jesus of Prague - 304 Jim Thorpe Blvd., P.O. Box 488, Prague, OK 74864 (t) 405-567-3080 infantofprague@prague Shrine@gmail.com

www.shrineofinfantjesus.com Rev. Lung N. Phan, Admin.;

MONASTERIES AND RESIDENCES FOR PRIESTS AND BROTHERS [MON]

OKLAHOMA CITY

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Sancho, O.C.D., Mem.; Priests: 2

SHAWNEE

St. Gregory's Abbey - Legal Titles: Benedictine Fathers of Sacred Heart Mission, Inc. 1900 W. MacArthur Dr., Shawnee, OK 74804 (t) 405-878-5491

abbot@monksok.org; retreats@monksok.org www.monksok.org Order of St. Benedict, including

Novitiate, Conference Center and the Mahe-Gerner Museum of Art. Bro. John Michael F. Nguyen, O.S.B.,

In Res.; Rev. Joachim Speerth, O.S.B., In Res.; Rev. Adrian R. Vanderlandwehr, O.S.B., In Res.; Bro.

Damian S. Whalen, O.S.B., In Res.; Rt. Rev. Lawrence R. Staszyn, O.S.B., Abbot; Rev. Boniface T. Copein,

O.S.B., Prior; Rev. Nicholas K. Ast, O.S.B., In Res.; Rev. Charles J. Buckley, O.S.B., In Res.; Bro. Benet S.

Exton, O.S.B., In Res.; Bro. Isidore D. Harden, O.S.B., In Res.; Rev. Brendan J. Helbing, O.S.B., Hospital

Chaplain; Bro. George A. Hubl, O.S.B., In Res.; Rt. Rev. Murin Lugo, O.S.B., In Res.; Rev. Manuel

Magallanes, O.S.B., In Res.; Rev. Patrick McCool, O.S.B., In Res.; Bro. Kevin E. McGuire, O.S.B., In Res.;

Bro. Dominic J. Ramirez, O.S.B., In Res.; Bro. Peter M. Shultz, O.S.B., Theological Studies; Rev. Simeon Z.

Spitz, O.S.B., Sub-Prior, Vocational Director; Rev. Paul J. Zahler, O.S.B., In Res.; Brs.: 8; Priests: 12

Saint Gregory's Abbey Benefit Trust - (t) 405-878-5463

NURSING / REHABILITATION / CONVALESCENCE / ELDERLY CARE [NUR]

EL RENO

Saint Katharine Drexel Retirement Center, Inc. - 301 W. Wade, El Reno, OK 73036 (t) 405-262-3920

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OKLAHOMA CITY

Saint Ann Retirement Center, Inc. - 7501 W. Britton Rd., Oklahoma City, OK 73132 (t) 405-721-0747

Joyce@SaintAnnRetirementCenter.com www.saintannretirementcenter.com Assisted and

Independent Living Joyce Clark, Dir.; Asst. Annu.: 300; Staff: 54

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Bld., Oklahoma City, OK 73106 (t) 405-523-3000 prnglow@ccoke.org; jmoons@ccoke.org ccoke.org 40

Independent-Living Apartments for Low-Income senior citizens. Patrick J. Raglow, Secy.; Asst. Annu.: 65; Staff: 3

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Independent-Living Apartments for Low-Income Elderly. Patrick J. Raglow, Secy.; Asst. Annu.: 46; Staff: 3

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Rev. Curson Krittenbrink, Pres.; Asst. Annu.: 6

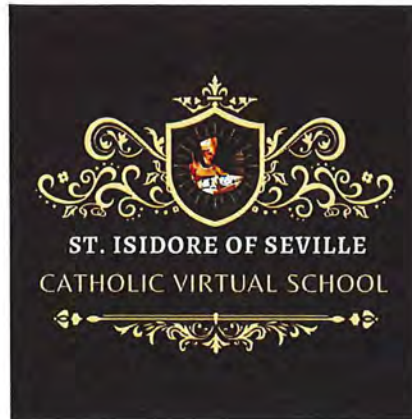
Via Christi Village Ponca City, Inc. - Legal Titles: Via Christi Village Ponca City, Inc. d/b/a Ascension Living

Via Christi Village Ponca City 1601 Academy Rd., Ponca City, OK 74604 (t) 314-292-9308 zhscm-

mission@ascensionliving.org www.ascensionliving.org/ Daniel

Stricker, Pres.; Asst. Annu.: 221; Staff: 78

An asterisk (*) denotes an organization that has established tax-exempt status directly with the IRS and is not covered by the USCCB Group Ruling.



Section 13: Appendix N: Attorney General Opinion Dec. 2022



JOHN M. O'CONNOR
ATTORNEY GENERAL

ATTORNEY GENERAL OPINION
2022-7

Rebecca L. Wilkinson, Ed.D.
Executive Director
Statewide Virtual Charter School Board
2501 N. Lincoln Blvd., Suite 301
Oklahoma City, OK 73105

December 1, 2022

Dear Executive Director Wilkinson,

This office has received your request for an official Attorney General Opinion in which you ask, in effect, the following question:

Currently, an Oklahoma charter school must not be “affiliated with a nonpublic sectarian school or religious institution,” and must “be nonsectarian in its programs, admission policies, employment practices, and all other operations” under 70 O.S.2021, § 3-136(A)(2).

After the U.S. Supreme Court’s holdings in *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012 (2017), *Espinoza v. Montana Department of Revenue*, 140 S. Ct. 2246 (2020), and *Carson v. Makin*, 142 S. Ct. 1987 (2022), construing the First Amendment’s Free Exercise Clause, may the Statewide Virtual Charter School Board continue to enforce the nonsectarian requirements set forth in 70 O.S.2021, §3-136(A)(2)?

I.
BACKGROUND

A. Charter schools in Oklahoma

In 1999, the State Legislature enacted the Oklahoma Charter Schools Act (“the Act”) to increase learning opportunities, encourage “the use of different and innovative teaching methods,” and provide “additional academic choices for parents and students.” 70 O.S.2021, § 3-131(A). Nearly twenty-five years later, there are approximately 30 charter schools in Oklahoma that serve over 80,000 schoolchildren. *See* OKLA. STATE DEP’T OF EDUC., Okla. Charter School Report 2021 at 4, 10-11. Those children make up around 11.7% of public school students in Oklahoma. *Id.* at 11.



This number “has increased dramatically over the last few years as a result of the expansion of virtual charter schools” in 2012. *Id.* In terms of funding, the “total State Aid Allocation to charter schools in the 2020-21 school year” was around \$420 million. *Id.* at 8.

A charter school, according to the Act, is a “public school established by contract . . . to provide learning that will improve student achievement . . .” 70 O.S.2021, § 3-132(D). A sponsor and an operator partner together to form a charter school. Sponsors must be public entities such as school districts, state colleges, or the State Board of Education. *Id.* § 3-132(A). Sponsors have various powers and duties, including approving charter applications if they “meet identified educational needs and promote a diversity of educational choices.” *Id.* § 3-134(I)(3). Before approving a new school, sponsors must consider factors such as an applicant’s “strong and reliable record of academic success,” “financial and operational success,” and “ability to transfer successful practices to a potentially different context that includes reproducing critical cultural, organizational, and instructional characteristics.” *Id.* § 3-132(C).

Operators who are authorized to establish a charter school may be public or private: this includes a “private college or university, private person, or private organization,” although an existing private school is ineligible. *Id.* § 3-134(C). An entity seeking to operate a charter school must submit a written application to the sponsor that includes, *inter alia*, a “description of the instructional design of the charter school, including the type of learning environment, class size and structure, curriculum overview and teaching methods.” *Id.* § 3-134(B)(14). Upon approval of the application, the sponsor and operator enter a contract. This contract must make the charter school “as equally free and open to all students as traditional public schools,” it must require “the same academic standards and expectations as existing public schools,” and it must contain a “description of the requirements and procedures for the charter school to receive funding in accordance with statutory requirements and guidelines for existing public schools.” *Id.* § 3-135(A).

As the name indicates, a charter school is also required to adopt a charter that ensures compliance with certain requirements. *Id.* § 3-136(A). Under the charter, the school must participate in standardized testing and report test results as if it is a school district. *Id.* § 3-136(A)(4). The school must educate children with disabilities the same way a public school district does. *Id.* § 3-136(A)(7). The school cannot charge tuition or fees. *Id.* § 3-136(A)(10). The school is considered a school district for tort liability under The Governmental Tort Claims Act. *Id.* § 3-136(A)(13). In addition, charter school employees are authorized to participate in the Teachers’ Retirement System of Oklahoma. *Id.* § 3-136(A)(14).

Charter schools have substantial flexibility in terms of curriculum. A “charter school may offer a curriculum which emphasizes a specific learning philosophy or style or certain subject areas such as mathematics, science, fine arts, performance arts, or foreign language.” *Id.* § 3-136(A)(3). Indeed, from its inception, the Act has “exempt[ed] charter schools from the new core curriculum requirements for public schools found at 70 O.S.Supp.1999, § 11-103.6(B).” 1999 OK AG 64; *see also* 70 O.S.2021, § 3-136(A)(3) (“The charter of a charter school which offers grades nine through twelve shall specifically address whether the charter school will comply with the graduation requirements established in Section 11-103.6 of this title.”). Nor are charter schools required “to adhere to the Teacher and Leader Effectiveness standards set by the state of Oklahoma.” OKLA. STATE DEP’T OF EDUC., Okla. Charter Schools Program, <https://sde.ok.gov/faqs/oklahoma-charter->

schools-program (last visited Nov. 28, 2022). Teachers at charter schools are not required to hold valid Oklahoma teaching certificates, either. *Id.* Overall, for curriculum and beyond, “[e]xcept as provided for in the Oklahoma Charter Schools Act and its charter, a charter school shall be exempt from all statutes and rules relating to schools, boards of education, and school districts.” 70 O.S.2021, § 3-136(A)(5).

Funding for Oklahoma charter schools is primarily public, but also includes some private sourcing. Like public schools, charters are funded mostly through the State Aid allocation. *Id.* § 3-142(A). They also receive federal funds if they are eligible and qualify, “and any other state-appropriated revenue generated by [their] students for the applicable year.” *Id.* A “Charter Schools Incentive Fund” also exists, which contains “all monies appropriated by the Legislature, gifts, grants, devises and donations from any public or private source.” *Id.* § 3-144(A).

Finally, at the center of this opinion request is 70 O.S.2021, § 3-136(A)(2), which provides: (1) that a “charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations,” and (2) that a “sponsor may not authorize a charter school or program that is affiliated with a nonpublic sectarian school or religious institution.”

B. *Trinity Lutheran, Espinoza, and Carson*

The First Amendment to the U.S. Constitution states that “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof.” The U.S. Supreme Court has “repeatedly held that a State violates the Free Exercise Clause when it excludes religious observers from otherwise available public benefits.” *Carson v. Makin*, 142 S. Ct. 1987, 1996 (2022). In the past five years alone, the U.S. Supreme Court has prevented officials in three States from excluding religious adherents from different types of public benefit programs relating to pre-K, primary, or secondary schools.

First, in *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012 (2017), the U.S. Supreme Court analyzed a Missouri policy barring churches, sects, or other religious entities from receiving financial grants to install softer playground surfaces made from recycled tires. Applying this policy, Missouri denied a grant to the Trinity Lutheran Church Child Learning Center. *Id.* at 2017-18. In doing so, Missouri relied upon a provision in the Missouri Constitution stating that “no money shall ever be taken from the public treasury, directly or indirectly, in aid of any church, sect or denomination of religion . . .” *Id.* (quoting MO. CONST. art. I, § 7).

The U.S. Supreme Court found Missouri’s discriminatory behavior “odious” to the U.S. Constitution. *Id.* at 2025. Missouri, the Court held, had “expressly require[d] Trinity Lutheran to renounce its religious character in order to participate in an otherwise generally available public benefit program.” *Id.* at 2024. Applying the “most rigorous” and strict judicial scrutiny to the policy, the Court held that there was a “clear infringement on free exercise” and no compelling anti-establishment interest that could justify such discrimination. *Id.* (citation omitted).

Second, in *Espinoza v. Montana Department of Revenue*, 140 S. Ct. 2246 (2020), the U.S. Supreme Court evaluated a program in which Montana gave a tax credit to a person who sponsored a scholarship for a child’s tuition at any private school chosen by the child’s family. The Montana

Constitution prohibits government aid to any “sectarian” school—*i.e.*, any school “controlled in whole or in part by any church, sect, or denomination.” MONT. CONST. art. X, § 6(1). The Montana Department of Revenue cited this provision to prohibit families from using these scholarships at schools “owned or controlled in whole or in part by any church, religious sect, or denomination.” *Espinoza*, 140 S. Ct. at 2252 (citation omitted). Montana’s Attorney General disagreed, arguing that the discriminatory policy “very likely” violated the U.S. Constitution. *Id.* The Montana Supreme Court, on the other hand, dismantled the entire scholarship program because religious schools were required to be included. *Id.* at 2253-54.

On appeal, the U.S. Supreme Court reversed the Montana Supreme Court. “A State need not subsidize private education,” the Court explained, “[b]ut once a State decides to do so, it cannot disqualify some private schools solely because they are religious.” *Id.* at 2261. The Montana Supreme Court’s application of the Montana Constitution wrongly barred “religious schools from public benefits solely because of the religious character of the schools.” *Id.* at 2255. “Given the conflict between the Free Exercise Clause and the application of the no-aid provision here, the Montana Supreme Court should have ‘disregard[ed]’ the no-aid provision and decided this case ‘conformably to the [C]onstitution’ of the United States.” *Id.* at 2262 (quoting *Marbury v. Madison*, 5 U.S. 137 (1803)). In sum, Montana’s religious exclusion was “odious to our Constitution” and “cannot stand.” *Id.* at 2262-63 (quoting *Trinity Lutheran*, 137 S. Ct. at 2025).

Third, in *Carson v. Makin*, 142 S. Ct. 1207 (2022), the U.S. Supreme Court evaluated a Maine program providing tuition assistance for parents in rural school districts that lacked a secondary school. “Under the program, parents designate the secondary school they would like their child to attend—public or private—and the school district transmits payments to that school to help defray the costs of tuition.” *Id.* at 1213. To receive payments, Maine required private schools to be accredited, teach Maine history, and maintain a certain student-teacher ratio, although their teachers did not need to be certified by the state or utilize Maine’s curricular requirements. *Id.* at 1213-14.

In 1981, Maine began to insist that any private school receiving tuition under this program must be “nonsectarian.” *Id.* at 1214 (quoting ME. REV. STAT. ANN., tit. 20-A, § 2951(2)). This route was chosen “in response to an opinion by the Maine attorney general taking the position that public funding of private religious schools violated the Establishment Clause.” *Id.* Maine considered “a sectarian school to be one that is associated with a particular faith or belief system and which, in addition to teaching academic subjects, promotes the faith or belief system with which it is associated and/or presents the material taught through the lens of this faith.” *Id.* (quoting *Carson v. Makin*, 979 F.3d 21, 38 (1st Cir. 2020)).

Faced with a Free Exercise challenge to this discrimination, the First Circuit upheld Maine’s “nonsectarian” prohibition. *Carson*, 979 F.3d at 25-26. Per the First Circuit, *Espinoza* meant Maine could not bar schools from receiving funding “based on their religious *identity*,” but it could bar funding “based on the religious *use* that they would make of it in instructing children.” *Id.* at 40 (emphases added). In addition, the First Circuit found that Maine’s program was distinct from *Espinoza* because Maine sought to provide “a rough equivalent of the public school education that Maine may permissibly require to be secular.” *Id.* at 44.

Maine parents appealed to the U.S. Supreme Court, which ruled in their favor and held that “[t]he ‘unremarkable’ principles applied in *Trinity Lutheran* and *Espinoza* suffice to resolve this case.” *Carson*, 142 S. Ct. at 1997. By disqualifying schools from an open benefit solely because they are religious, Maine effectively penalized the free exercise of religion. *Id.* (citing *Trinity Lutheran*, 137 S. Ct. at 2021). Maine’s program was not neutral, the Court emphasized, but clearly discriminatory. *Id.* at 1998. The “strictest scrutiny” therefore applied, whereby government action is invalid unless it advances compelling “interests of the highest order” and is “narrowly tailored in pursuit of those interests.” *Id.* at 1997 (citations omitted).

As it did in *Trinity Lutheran* and *Espinoza*, the U.S. Supreme Court found that an “interest in separating church and state ‘more fiercely’ than the Federal Constitution . . . ‘cannot qualify as compelling’ in the face of the infringement of free exercise.” *Carson*, 142 S. Ct. at 1998 (quoting *Espinoza*, 140 S. Ct. at 2260 & *Trinity Lutheran*, 137 S. Ct. at 2024). Only an actual Establishment Clause violation could suffice, according to the Court, and “a neutral benefit program in which public funds flow to religious organizations through the independent choices of private benefit recipients does not offend the Establishment Clause.” *Id.* at 1997 (citing *Zelman v. Simmons-Harris*, 536 U.S. 639, 652-53 (2002)).

It did not matter that Maine said participating schools were required to provide the “rough equivalent” of a public school education, the Court held. *Id.* at 1998-2000 (quoting *Carson*, 979 F.3d at 44). For starters, the “differences between private schools eligible to receive tuition assistance under Maine’s program and a Maine public school are numerous and important.” *Id.* at 1999. Maine’s program did “not have to accept all students,” for example, whereas “[p]ublic schools generally do,” and Maine public education is free whereas private schools typically cost money. *Id.* Moreover, “the curriculum taught at participating private schools need not even resemble that taught in the Maine public schools,” and “[p]articipating schools need not hire state-certified teachers.” *Id.* The label “public” did not control, either, since a discriminatory condition on funding is still discrimination, no matter how much a state might claim it is part of the “definition of a particular program.” *Id.* at 1999-2000 (citation omitted).

That is to say, the U.S. Supreme Court looks at the “substance of free exercise protections, not on the presence or absence of magic words” like “public.” *Id.* at 2000. To hold otherwise, the Court observed, would render “our decision in *Espinoza* . . . essentially meaningless,” since Montana could have just claimed that its tax credit was limited to tuition payments for the “rough equivalent” of a secular public education. *Id.* at 2000. Put differently, the Free Exercise Clause applies to express discrimination *or* to “a party’s reconceptualization of the public benefit.” *Id.* By allowing state funds to go to private schools—a “decision [that] was not ‘forced upon’ it”—Maine could not “disqualify some private schools solely because they are religious.” *Id.* (quoting *Espinoza*, 140 S. Ct. at 2261).

Carson also held, importantly, that a state could not justify discrimination by claiming it was just preventing organizations from *using* state aid in religious ways. Use-based religious discrimination, the U.S. Supreme Court emphasized, is just as “offensive to the Free Exercise Clause” as status-based discrimination. *Id.* at 2001. Maine’s program was unconstitutional because, “[r]egardless of how the benefit and restriction are described, the program operates to identify and exclude otherwise eligible schools on the basis of their religious exercise.” *Id.* at 2002.

In sum, *Carson* stands for the principle that “[a] State’s antiestablishment interest does not justify enactments that exclude some members of the community from an otherwise generally available public benefit because of their religious exercise.” *Id.* at 1998.

II. DISCUSSION

You ask what effect, if any, the *Trinity Lutheran*, *Espinoza*, and *Carson* decisions have on the validity of the non-sectarian restrictions found in Section 3-136(A)(2) of the Oklahoma Charter School Act. That passage states as follows:

A charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations. A sponsor may not authorize a charter school or program that is affiliated with a nonpublic sectarian school or religious institution

We believe, based on the First Amendment and the *Trinity Lutheran*, *Espinoza*, and *Carson* line of decisions, that the U.S. Supreme Court would likely hold these restrictions unconstitutional. Because of the significant differences between the two sentences in Section 3-136(A)(2), we will address them separately.

A. “A sponsor may not authorize a charter school or program that is affiliated with a nonpublic sectarian school or religious institution”

The second sentence of Section 3-136(A)(2) is the most problematic, and very likely to be held unconstitutional. Under *Trinity Lutheran*, *Espinoza*, and *Carson*, it seems obvious that a state cannot exclude those merely “affiliated with” a religious or sectarian institution from a state-created program in which private entities are otherwise generally allowed to participate if they are qualified. And that is exactly what this provision does.

The Act expressly allows any qualified “private college or university, private person, or private organization” to establish a charter school. 70 O.S.2021, § 3-134(C). And once qualified private entities are invited into the program, Oklahoma cannot disqualify some private persons or organizations “solely because they are religious” or “sectarian.” *Carson*, 142 S. Ct. at 1997 (quoting *Espinoza*, 140 S. Ct. at 2261). Even less so can the State exclude private persons or organizations that are merely “affiliated with” sectarian or religious institutions. *Cf. United States v. Brown*, 352 F.3d 654, 669 (2d Cir. 2003) (“Exercising peremptory strikes simply because a venire member affiliates herself with a certain religion is therefore a form of ‘state-sponsored group stereotype[] rooted in, and reflective of, historical prejudice.’” (quoting *J.E.B. v. Alabama*, 511 U.S. 127, 128 (1994))). Both approaches evince clear hostility, not neutrality, to religion. Thus, the provision in question is highly likely to be found unconstitutional if the State continues to enforce it. *See Masterpiece Cakeshop, Ltd. v. Colo. Civil Rights Comm’n*, 138 S. Ct. 1719, 1731 (2018) (states have a “duty under the First Amendment not to base laws or regulations on hostility to a religion or religious viewpoint”).

It is not a problem that, under this interpretation, a substantial amount of public funds could be sent to religious organizations or their affiliates. As the U.S. Supreme Court emphasized in *Carson*, “a neutral benefit program in which public funds flow to religious organizations through the independent choices of private benefit recipients does not offend the Establishment Clause.” 142 S. Ct. at 1997. No student is forced to attend a charter school—it is one option among several for parents. *See, e.g., OKLA. STATE DEP’T OF ED., School Choice*, <https://sde.ok.gov/schoolchoice> (last visited Nov. 29, 2022). The Establishment Clause therefore provides no cover for a clear Free Exercise Clause violation here.

The Oklahoma Constitution provides no hurdle, either. To be sure, Article II, Section 5 of the Oklahoma Constitution states that “[n]o public money or property shall ever be appropriated, applied, donated, or used, directly or indirectly, for the use, benefit, or support of any sect, church, denomination, or system of religion, or for the use, benefit, or support of any priest, preacher, minister, or other religious teacher or dignitary, or sectarian institution as such.” However, the Oklahoma Supreme Court has interpreted this restriction in a way that makes it inapplicable here. *See Oliver v. Hofmeister* 2016 OK 15, 368 P.3d 1270.

Starting in 1993, the Oklahoma Legislature gave school districts the option to provide services to children with disabilities or “enter into a written agreement with a private institution to provide the mandated services.” *Id.* ¶ 7, 368 P.3d at 1273 (emphasis omitted). In 2010, the Legislature crafted the Lindsey Nicole Henry Scholarships for Students with Disabilities Act, a program that “simply allowed parents and legal guardians the same right that school districts already enjoyed, the choice to use state funds to contract with an approved private institution for special education services.” *Id.* (emphases omitted). Participation in the program “is entirely voluntary,” as “[e]ach family independently decides without influence from the State whether to enroll their child.” *Id.* ¶ 8, 368 P.3d at 1273 (emphasis omitted).

Because the Lindsey Nicole Henry scholarship program allowed “[a]ny private school, whether sectarian or non-sectarian,” to participate, several taxpayers sued, arguing that the program violated Article II, Section 5. *Id.* ¶¶ 1, 11-12, 368 P.3d at 1271-72, 1274. The Oklahoma Supreme Court unanimously disagreed, reversing the district court. *Id.* ¶ 27, 368 P.3d at 1277. Relying on U.S. Supreme Court precedent pre-dating *Trinity Lutheran*, *Espinoza*, and *Carson*, the Oklahoma Supreme Court considered “the neutrality of the scholarship program” to be an important factor, as well as the “private choice exercised by the families.” *Id.* ¶ 13, 368 P.3d at 1274 (citing *Zelman*, 536 U.S. at 641). “When the *parents* and not the *government* are the ones determining which private school offers the best learning environment for their child,” the Oklahoma Supreme Court emphasized, “the circuit between government and religion is broken.” *Id.* (emphases in original).

Utilizing those principles, the Oklahoma Supreme Court found that the Lindsey Nicole Henry scholarship program was “completely neutral with regard to religion” and therefore unobjectionable under Article II, Section 5. *Id.* ¶ 26, 368 P.3d at 1277. “Scholarship funds deposited to a private sectarian school occur only as the result of private independent choice by the parent or legal guardian.” *Id.* ¶ 14, 368 P.3d at 1274. “[T]his independence of choice by the parent breaks the circuit between government and religion,” the Court held. *Id.* ¶ 15, 368 P.3d at 1274. It was not unconstitutional for a public school district to “fulfill its state mandated duty to provide educational services to children by . . . entering into a written agreement with an eligible

private institution in the public school district,” even a sectarian institution. *Id.* ¶¶ 23-24, 368 P.3d at 1276. This holding, the Court pointed out, flowed directly from previous decisions concerning Article II, Section 5. Those cases had “clarified that as long as the services being provided ‘involve the element of substantial return to the state and do not amount to a gift, donation, or appropriation to the institution having no relevancy to the affairs of the state, there is no constitutional provision offended.’” *Id.* ¶ 19, 368 P.3d at 1275 (quoting *Murrow Indian Orphans Home v. Childers*, 1946 OK 187, ¶ 9, 171 P.3d 600, 603).¹

Applying *Oliver*’s principles here, allowing religiously affiliated participants to “provide educational services to children by ... entering into a written agreement” with a charter school sponsor would not violate the Oklahoma Constitution. *Id.* ¶ 24, 368 P.3d at 1276. This is because charter schools are entirely optional for parents, “break[ing] the circuit between government and religion.” *Id.* ¶ 15, 368 P.3d at 1274. And allowing the religious or religiously affiliated to participate would make the system neutral rather than hostile to religion. *See id.* ¶ 26, 368 P.3d at 1277. Thus, the Oklahoma Constitution does not prohibit religiously affiliated charter schools.²

In conclusion, the second sentence of Section 3-136(A)(2) of the Oklahoma Charter Schools Act is highly likely to be found unconstitutional under the Free Exercise Clause if it is enforced. In Oklahoma, so long as the Act permits private persons and organizations to establish and operate charter schools—and assuming the private applicant is otherwise qualified pursuant to neutral rules found elsewhere in the Act—sponsors should not disqualify an applicant solely based on the applicant’s religion, “sectarianism,” or religious affiliation, as this would in all probability be deemed “odious” to the United States Constitution.

B. “A charter school shall be nonsectarian in its programs, admission policies, employment practices, and all other operations”

The more complex question here is whether a religiously affiliated applicant must be allowed to establish and operate a charter school in conformance with that applicant’s “sectarian” or “religious” traditions. In our view, the answer under the United States Constitution is likely yes, as well, for the following reasons.

To begin, it is helpful to remember that, when analyzing certain legal challenges under the U.S. Constitution, the U.S. Supreme Court employs various “tiers” or “levels” of scrutiny depending on the context. If “strict scrutiny” applies, the law or governmental practice in question must be “narrowly tailored to serve a compelling interest.” *Williams-Yulee v. Fla. Bar*, 575 U.S. 433, 444

¹ The plaintiffs in *Oliver* also sued under Article I, Section 5, which states that “[p]rovisions shall be made for the establishment and maintenance of a system of public schools, which shall be open to all the children of the state and free from sectarian control” The district court granted summary judgment to the State on this claim, *Oliver v. Barresi*, No. CV-2013-2072, 2014 WL 12531242, at *1 (Okla. Cnty. Sep. 10, 2014), and the Oklahoma Supreme Court did not, in *Oliver*, cite this provision or indicate that it would somehow change its analysis.

² Of course, even if *Oliver* held otherwise, the U.S. Supreme Court has clearly explained that State officials must first follow the federal Constitution in these types of cases. *See Espinoza*, 140 S. Ct. at 2253-54, 2262-63.

(2015). Only in “rare cases” will a law survive a court’s strict scrutiny analysis. *Id.* A far less rigorous and more government-friendly approach is “rational basis review,” which merely requires a law to “be rationally related to a legitimate governmental purpose.” *Clark v. Jeter*, 486 U.S. 456, 461 (1988); see also *Sklar v. Byrne*, 727 F.2d 633, 640 (7th Cir. 1984) (“most legislative enactments survive the rational basis test”). Thirdly, “[b]etween these extremes of rational basis review and strict scrutiny lies a level of intermediate scrutiny.” *Clark*, 486 U.S. at 461. “To withstand intermediate scrutiny, a statutory classification must be substantially related to an important governmental objective.” *Id.*

In the context of the First Amendment’s Free Exercise Clause, laws that “incidentally burden[] religion are ordinarily not subject to strict scrutiny ... so long as they are neutral and generally applicable.” *Fulton v. City of Philadelphia*, 141 S. Ct. 1868, 1876 (2021) (citing *Emp’t Div. v. Smith*, 494 U.S. 872, 878-882 (1990)). In such instances, courts apply “only ... rational-basis scrutiny.” *United States v. Wilgus*, 638 F.3d 1274, 1279 (10th Cir. 2011). The U.S. Supreme Court has for many years made it clear, however, that a “law targeting religious beliefs as such is never permissible,” and a law prohibiting religious *practices* is subject to strict scrutiny as well, if it “discriminate[s] on its face” or its object “is to infringe upon or restrict practices because of their religious motivation.” *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 533 (1993).

Here, the first sentence of Section 3-136(A)(2) does both—it expressly targets religion, and its object is clearly to restrict religiously motivated practices. Thus, for the same reasons already discussed, this provision lacks neutrality and “the strictest scrutiny” would be applied by a federal court. *Carson*, 142 S. Ct. at 1997. And if generic “strict scrutiny” means a law will be upheld only in “rare” circumstances, *Williams-Yulee*, 575 U.S. at 444, it would stand to reason that a law will almost never survive when it is subjected to the “strictest scrutiny.”

In the wake of *Trinity Lutheran*, *Espinoza*, and *Carson*, the only conceivable way to show an interest compelling enough to survive the strictest judicial scrutiny in this context would be to argue that the Establishment Clause requires or at least permits Oklahoma to prohibit charter schools from being operated in accordance with religious principles. In *Locke v. Davey*, for instance, the U.S. Supreme Court held that the State of Washington did not violate the Free Exercise Clause by forbidding college students from using a state-granted scholarship “at an institution where they are pursuing a degree in devotional theology.” 540 U.S. 712, 715 (2004). This prohibition, the Court held, was permissible because of the “State’s antiestablishment interests,” even though funding these types of degrees would not actually be a federal Establishment Clause violation. *Id.* at 718-19, 722.

Having reviewed the relevant case law, however, we see little reason to believe the Supreme Court would divert from its recent precedent and hold that Oklahoma can rely on the Establishment Clause to justify discrimination in this context. There are multiple reasons to believe otherwise.

First, to hold that religiously affiliated organizations must be allowed to establish and operate a charter school but may be barred from acting in any way religious or “sectarian” in doing so, would be to embrace the distinction between religious “status” and “use” that the U.S. Supreme Court just rejected in *Carson*. Use-based religious discrimination, *Carson* explained, is just as “offensive

to the Free Exercise Clause” as status-based discrimination. *Carson*, 142 S. Ct. at 2001. To convey to a religious adherent that she can participate in a government program alongside other private entities but cannot act out her religious beliefs shows hostility to religion, not neutrality. See *Fulton*, 141 S. Ct. at 1877 (“Government fails to act neutrally when it proceeds in a manner intolerant of religious beliefs or restricts *practices* because of their religious nature.” (emphasis added)).

Second, Missouri, Montana, and Maine all attempted to rely on *Locke* and the Establishment Clause to justify their religious discrimination, and the Court rebuffed their attempts with explanations that apply here. We see no reason why the Court would change course now.

In *Trinity Lutheran*, the Court distinguished *Locke* in part because the Washington scholarship program in question “went ‘a long way toward including religion in its benefits.’” 137 S. Ct. at 2023 (quoting *Locke*, 540 U.S. at 724). Indeed, “[s]tudents in the program were free to use their scholarships at ‘pervasively religious schools.’” *Id.* The program at issue in Missouri, in contrast, put Trinity Lutheran “to the choice between being a church and receiving a government benefit” with a “simple” rule: “No churches need apply.” *Id.* at 2024. The Oklahoma provisions in question are much more like the latter restriction than *Locke*: they tell any religious or religiously affiliated private entities that they “need [not] apply” and that there will be no benefits whatsoever bestowed on anything pertaining to religious identity or use.

Going further, in *Espinoza* the Court pointed out that *Locke* was based on a “‘historic and substantial’ state interest in not funding the training of clergy.” 140 S. Ct. at 2257-58 (quoting *Locke*, 540 U.S. at 725). And that interest, the Court emphasized, did *not* extend to denying public funds to religious schools in general. To the contrary, “[i]n the founding era and the early 19th century, governments provided financial support to private schools, including denominational ones.” *Id.* at 2258. For example, “[a]fter the Civil War, Congress spent large sums on education for emancipated freedmen, often by supporting denominational schools in the South through the Freedmen’s Bureau.” *Id.*

Certainly, there was a trend of “no-aid” provisions that “more than 30 states” adopted starting in the mid-to-late 1800s. *Id.* But the Supreme Court rejected reliance on this trend. “[M]any of the no-aid provisions belong to a more checkered tradition shared with the Blaine Amendment of the 1870s,” the Court observed, which would “have added to the Federal Constitution a provision ... prohibiting States from aiding ‘sectarian’ schools.” *Id.* at 2259. The Court criticized the Blaine Amendment as being “born of bigotry” and having arisen “at a time of pervasive hostility to the Catholic Church and to Catholics in general.” *Id.* (quoting *Mitchell v. Helms*, 530 U.S. 793, 828-29 (2000) (plurality opinion)). And, the Court observed, “[i]t was an open secret that ‘sectarian’ was code for ‘Catholic.’” *Id.* (quoting *Mitchell*, 530 U.S. at 828). State counterparts to the Blaine Amendment were not spared the Court’s ire: “many” of them “have a similarly ‘shameful pedigree.’” *Id.* (quoting *Mitchell*, 530 U.S. at 828-29).³ As a result, “[t]he no-aid provisions of the

³ Several state justices have argued that Article II, Section 5 of the Oklahoma Constitution did not originate with the Blaine Amendment. See *Prescott v. Okla. Capitol Pres. Comm’n*, 2015 OK 54, ¶ 1, 373 P.3d 1032, 1036 (Edmondson, J., concurring); *id.* ¶¶ 17-20, 373 P.3d at 1040-41

19th century hardly evince a tradition that should inform our understanding of the Free Exercise Clause.” *Id.* In the end, the Court emphasized, “it is clear that there is no ‘historic and substantial’ tradition against aiding such [religious] schools comparable to the tradition against state-supported clergy invoked by *Locke*.” *Id.*

Third, the Supreme Court has routinely deployed broad language in this area, especially when describing basic constitutional law principles surrounding the First Amendment, schools, and school-choice programs that include private participants and operators. Even if one can discern factual distinctions between Oklahoma charter schools and the state regulations at issue in *Trinity Lutheran*, *Espinoza*, and *Carson*, the Court’s expansive phrasing—*e.g.*, the “strictest scrutiny”—signals loud and clear that the Court is not willing to uphold state discrimination in this arena.

Carson is particularly prominent in this regard. There, the Court concluded that *Locke* “cannot be read beyond its narrow focus on vocational religious degrees to generally authorize the State to exclude religious persons from the enjoyment of public benefits on the basis of their *anticipated religious use* of the benefits.” *Carson*, 142 S. Ct. at 2002 (emphasis added). *Carson* also emphasized that “a neutral benefit program in which public funds flow to religious organizations through the independent choices of private benefit recipients does not offend the Establishment Clause.” *Id.* at 1997 (citing *Zelman*, 536 U.S. at 652-53). These principles apply here, clearly.

Fourth, that Oklahoma law considers charter schools to be public schools for various purposes does not mean that religious discrimination must be allowed. Indeed, plaintiffs may not even be able to bring a federal Establishment Clause challenge against religious charter schools, much less prevail on one. A bedrock principle of federal law is that certain statutory and constitutional claims may only be brought against the government or state. To determine whether an entity is acting “under color of” state law, 42 U.S.C. § 1983,⁴ or performing a “state action” such that a lawsuit can avoid being dismissed, courts analyze whether the action in question “can fairly be attributed to the State.” *Blum v. Yaretsky*, 457 U.S. 991, 1004 (1982); *see also id.* at 1009 n.20. Here, U.S. Supreme Court precedent indicates that actions taken by charter schools are unlikely to fit this bill.

Most significantly, the U.S. Supreme Court held in *Rendell-Baker v. Kohn* that a school for special needs students, operated by a private board, was not a state actor for purposes of an employment lawsuit brought under § 1983, the First Amendment, and other laws. 457 U.S. 830 (1982). The Court explained, point-by-point, why the school was not a state actor in this instance even though it had contracted with public schools, “virtually all of the school’s income was derived from government funding,” the school “must comply with a variety of regulations ... common to all

(Taylor, J., concurring); *id.* ¶¶ 16-24, 373 P.3d at 1050-52 (Gurich, J., concurring); *id.* ¶¶ 11-12, 373 P.3d at 1057 (Combs, J., dissenting). One such justice conceded, however, that the language in Article I, Section 5 stating that public schools must be “free from sectarian control” does trace back to “the failed Blaine Amendment.” *Id.* ¶¶ 18-19, 373 P.3d at 1051 (Gurich, J., concurring). This is an additional reason to conclude that Article I, Section 5 would not alter the analysis presented here. *See also supra* nn.1 & 2.

⁴ Section 1983 is “a remedial vehicle for raising claims based on the violation of constitutional rights,” and “[t]here can be no ‘violation’ of § 1983 separate and apart from the underlying constitutional violations.” *Brown v. Buhman*, 822 F.3d 1151, 1161 n.9 (10th Cir. 2016).

schools,” it took “nearly all” of its students from public school referrals, and it issued high school diplomas certified by nearby public schools. *Id.* at 831-33, 840-843. For state action, the Court emphasized that the State must coerce or significantly encourage the specific conduct being challenged, *id.* at 840 (citing *Blum*, 457 U.S. at 1004), and that it is not enough to show that the school merely performed a “public function.” *Id.* at 842. Rather, the function must have “been ‘traditionally the exclusive prerogative of the State.’” *Id.* (emphasis in original) (citations omitted). And serving “maladjusted high school students ... who could not be served by traditional public schools” did not qualify. *Id.*

Relying on *Rendell-Baker*, the Ninth Circuit Court of Appeals has held that an Arizona charter school was not a state actor for employment law purposes. *See Caviness v. Horizon Cmty. Learning Ctr., Inc.*, 590 F.3d 806 (9th Cir. 2010). In reaching this conclusion, the Ninth Circuit found that various public aspects of Arizona charter schools—aspects that also exist in Oklahoma charter schools, such as public funding—did not mean charter schools were state actors under federal law for all purposes. *See id.* at 808-18 (citations omitted). The Ninth Circuit concluded that the school in *Rendell-Baker* was very much like the charter school in Arizona: both involved “a private entity that contracted with the state to provide students with educational services that are funded by the state.” *Caviness*, 590 F.3d at 815 (citing *Rendell-Baker*, 457 U.S. 830). “The Arizona legislature chose to provide alternative learning environments at public expense, but, as in *Rendell-Baker*, that ‘legislative policy choice in no way makes these services the exclusive province of the State.’” *Id.* (quoting *Rendell-Baker*, 457 U.S. at 842). The Ninth Circuit also held that the fact that the charter school’s “sponsor has the authority to approve and review the school’s charter” did not change its decision because “[a]ction taken by private entities with the mere approval or acquiescence of the State is not state action.” *Id.* at 817 (quoting *Am. Mfrs. Mut. Ins. Co. v. Sullivan*, 526 U.S. 40, 52 (1999)).

Other circuits have reached similar results interpreting *Rendell-Baker*, albeit not directly in the charter school context. *See Logiodice v. Trs. of Maine Cent. Inst.*, 296 F.3d 22, 24-26 (1st Cir. 2002) (finding no state action for a privately operated school that contracted into the Maine public school system later described in *Carson*, in part because “[e]ducation is not and never has been a function reserved to the state”); *Robert S. v. Stetson Sch., Inc.*, 256 F.3d 159, 166 (3d Cir. 2001) (Alito, J., writing for the panel) (holding that a publicly funded and contract-based school for juvenile sex offenders was not a state actor in part because it did not perform “a function that has been traditionally the exclusive province of the state”).

Not all courts have agreed, however, two of which deserve a mention here. The first is *Peltier v. Charter Day Sch., Inc.*, 37 F.4th 104 (4th Cir. 2022), where the Fourth Circuit held *en banc* that the operator of a North Carolina charter school performed a state action in implementing a school dress code. Without dissecting that lengthy decision in full, our view is that the Ninth Circuit and the six dissenters in *Peltier* have the better of the argument, as their reading of *Rendell-Baker* is far more faithful to that decision’s facts and principles than the Fourth Circuit’s. *See, e.g., Peltier*, 37 F.4th at 137, 142-43 (Quattlebaum, J., dissenting in part) (“[T]he majority misconstrues and ignores guidance from the Supreme Court and all of our sister circuits that have addressed either the same or very similar issues. ... These principles the Supreme Court articulated in *Rendell-Baker* ... make clear that [the charter school] is not subject to liability under § 1983.”). For example, *Rendell-Baker* held that for state action to exist, the government “must compel or at least

significantly encourage the conduct” in question, a critical point the Fourth Circuit ignored in its state action analysis even though it “properly conclude[d] that North Carolina did not coerce or compel the dress code” *Id.* at 148 (Quattlebaum, J., dissenting in part) (citing *Rendell-Baker*, 457 U.S. at 840). Applied to Oklahoma, any religious practice in charter schools would *not* be compelled or even significantly encouraged by the State. *See Blum*, 457 U.S. at 1004 (“[O]ur precedents indicate that a State normally can be held responsible for a private decision only when it has exercised coercive power or has provided such significant encouragement, either overt or covert, that the choice must in law be deemed to be that of the State.”). Thus, it would not be state action challengeable under the Establishment Clause.

The other decision worth mentioning is from 1982, where the Tenth Circuit Court of Appeals held that the owners and operators of a private school and detention facility for troubled boys were state actors under Section 1983. *See Milonas v. Williams*, 691 F.2d 931 (10th Cir. 1982). We agree with Justice Alito, then writing for the Third Circuit, that the “*Milonas* court’s reliance on ‘significant state funding of tuition’ and the detailed contracts between the school and local school districts appears to us to be squarely inconsistent with *Rendell-Baker*.” *Robert S.*, 256 F.3d at 168. Regardless, *Milonas* is distinguishable because the Tenth Circuit also “relied on the *involuntary* commitment of some students” to the detention facility—students sent by the state—to find state action. *Id.* at 167-68 (emphasis added); *see Milonas*, 691 F.2d at 940 (“Many of the members of the class were placed at the school involuntarily by juvenile courts and other state agencies acting alone”). No such involuntary commitment occurs in Oklahoma charter schools, which are entirely optional for parents.

Much like *Trinity Lutheran*, *Espinoza*, and *Carson* overwhelmingly indicate that the Oklahoma provisions in question violate the Free Exercise Clause, *Rendell-Baker* and *Caviness* counsel strongly toward a federal law finding that Oklahoma charter schools are not state actors and thus not vulnerable as an initial matter to an Establishment Clause challenge. *See also* Nicole Stelle Garnett, *Religious Charter Schools: Legally Permissible? Constitutionally Required?*, MANHATTAN INSTITUTE at 4 (Dec. 2020) (“[I]n most states, charter schools ought not to be considered, for federal constitutional purposes, ‘state actors’”).⁵ Indeed, it should not be overlooked that *Rendell-Baker* itself involved the dismissal of a challenge brought under the First Amendment. *See Rendell-Baker*, 457 U.S. at 837.

Fifth, the preferred method for determining state action in these cases—eschewing labels for relevant functions—dovetails with the substantive approach the U.S. Supreme Court took in *Carson*. There, the Court emphasized that a state’s decision to classify or label privately operated schools as public schools does not control the Court’s First Amendment analysis. “Regardless of how the benefit and restriction are described,” the Court explained, “the program operates to identify and exclude otherwise eligible schools on the basis of their religious exercise.” *Carson*, 142 S. Ct. at 2002. Maine’s program was therefore unconstitutional. To hold otherwise would render *Espinoza* “essentially meaningless,” since Montana could have claimed that its tax credit was limited to tuition payments for the “rough equivalent” of a public education. *Id.* at 2000.

⁵ Available at <https://www.manhattan-institute.org/religious-charter-schools-legally-permissible-constitutionally-required>.

Admittedly, *Carson* walked through factors that can be used to distinguish private and public schools, and, unlike in *Carson*, those factors here would fall on both sides of the public/private ledger. Compare, e.g., *id.* at 1999 (“[P]rivate schools ... do not have to accept all students. Public schools generally do.”), with 70 O.S.2021, § 3-135(A)(9) (requiring charter schools to “be as equally free and open to all students as traditional public schools”), and *Carson*, 142 S. Ct. at 1999 (“Participating [private] schools need not hire state-certified teachers.”), with OKLA. STATE DEP’T OF EDUC., Okla. Charter Schools Program, <https://sde.ok.gov/faqs/oklahoma-charter-schools-program> (last visited Nov. 30, 2022) (“[Oklahoma] charter schools are not required to employ an individual who holds a valid Oklahoma teaching certificate.”).

But that is unsurprising, as it is most certainly *not* our contention that Oklahoma’s description of charter schools as “public” is an empty or incorrect label. See, e.g., 2012 OK AG 12 (“The Act authorized the creation of charter schools, which *are public schools* established by contract.” (emphasis added)). The analysis here is limited solely to determining how the two “Religion Clauses” of the First Amendment apply to charter schools, and nothing more. And in that context *and that context alone*, the most significant factors—such as private operation and curriculum flexibility—point to a violation of the Free Exercise Clause and the inapplicability of the Establishment Clause, under current U.S. Supreme Court jurisprudence. That is as far as the reasoning in this opinion goes.

Oklahoma, in short, has decided to let private organizations establish and operate charter schools. In *Carson*, the Supreme Court treated the situation very nearly as a tautology: if schools are operated by private organizations, then the First Amendment prohibits status *and* use discrimination. And this makes sense in the First Amendment context. The State cannot outsource operation of entire schools to private entities with “critical cultural, organizational, and institutional characteristics” that the State desires to see reproduced, 70 O.S.2021, § 3-132(C)(3), allow them to innovate in terms of curriculum, and then retain the ability to discriminate against private entities who wish to exercise their religious faith. The State cannot enlist private organizations to “promote a diversity of educational choices,” *id.* § 3-134(I)(3), and then decide that any and every kind of religion is the wrong kind of diversity. This is not how the First Amendment works.

* * *

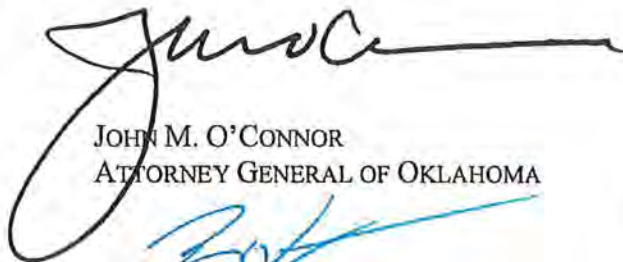
In sum, we do not believe the U.S. Supreme Court would accept the argument that, because charter schools are considered public for various purposes, that a state should be allowed to discriminate against religiously affiliated private participants who wish to establish and operate charter schools in accordance with their faith alongside other private participants. Almost nothing in the text or trajectory of *Trinity Lutheran*, *Espinoza*, or *Carson* would lead one to that conclusion, nor does the Supreme Court’s Establishment Clause or state actor jurisprudence point in that direction. Thus, the limitations found in Section 3-136(A)(2) are likely to be found unconstitutional insofar as they single out religiously affiliated organizations based solely on their “sectarian” status or their anticipated use of public funds for religious purposes.

It is important to emphasize, however, that to the extent that neutral and generally applicable limitations may be found elsewhere in the Act, those limitations can likely be applied to religious

charter schools, so long as they are truly neutral and applied equally to all charter schools alike. *See Fulton*, 141 S. Ct. at 1876-77. In other words, just because the provision prohibiting charter schools from being sectarian “in its programs, admission policies, employment practices, and all other operations” is likely unconstitutional does *not* mean that religious or religiously affiliated charter schools can necessarily operate however they want in regard to “programs, admission policies, employment practices,” and the like. The constitutional problem is singling out religion, not necessarily the provisions found elsewhere regulating various aspects of charter schools. For instance, as it currently stands federal law does not in all likelihood prohibit Oklahoma from enforcing requirements like those indicating that charter schools must be “as equally free and open to all students as traditional public schools,” 70 O.S.2021, § 3-135(A)(9), or must not charge tuition or fees, *id.* § 3-136(A)(10), so long as hostility to religion is not present.

It is, therefore, the official Opinion of the Attorney General that:

Pursuant to the conclusions of the United States Supreme Court in *Trinity Lutheran*, *Espinoza*, and *Carson*, the non-sectarian and non-religious requirements found in 70 O.S.2021, § 3-136(A)(2) of the Oklahoma Charter Schools Act likely violate the First Amendment to the U.S. Constitution and therefore should not be enforced.⁶


JOHN M. O'CONNOR
ATTORNEY GENERAL OF OKLAHOMA


ZACH WEST
SOLICITOR GENERAL



⁶ It has long been recognized that an Attorney General opinion finding an “act of the legislature is unconstitutional should be considered advisory only, and thus not binding until finally so determined by an action in the District Court of this state.” *State ex rel. York v. Turpen*, 1984 OK 26, ¶ 12, 681 P.2d 763, 767. Accordingly, this opinion should be deemed advisory only.

